

SAN DIEGO FIRE RECOVERY NETWORK

Fostering recovery of our human and natural environment through sound science, improved planning, public education, and community-based action.

5 February 2004

Mr. Walter Ekard
Chief Administrative Officer
County of San Diego
1600 Pacific Highway, Room 209
San Diego, CA 92101

Subject: Independent Science Reviews of San Diego Wildland Task Force Report, Mitigation Strategies for Reducing Wildland Fire Risks (August 2003)

Dear Mr. Ekard:

As the steering committee of the San Diego Fire Recovery Network, we're forwarding to you the attached independent reviews of an important county document entitled, *Mitigation Strategies for Reducing Wildland Fire Risks*, prepared for the County Board of Supervisors, August 13, 2003 (authors anonymous). The importance of this document was highlighted when it was cited by Supervisor Diane Jacob at the January 7, 2004, Board of Supervisors meeting as support for widespread vegetation management actions throughout the county.

We applaud the County's foresight in convening the task force and its intentions in preparing a comprehensive report to address wildland fire risks. Unfortunately, although we agree with many of the report's recommendations, we take strong exception with the report's treatment of the important issue of vegetation management. As supported by the attached reviews by prominent fire scientists, we find the report woefully inadequate and biased in its treatment of the available scientific information, and flawed in many of its assumptions, its treatment of published data, and its recommendations concerning vegetation management as part of a comprehensive fire-risk reduction strategy.

Introduction to San Diego Fire Recovery Network

The San Diego Fire Recovery Network (SDFRN) is a new coalition of land management professionals, scientists, and concerned citizens that formed in the immediate aftermath of the October wildfires. Partners and members in the organization include representatives of numerous governmental and non-governmental organizations with a common interest in protecting human health and safety as well as the quality of this county's valuable wildlands. SDFRN's mission is to foster the post-fire recovery of our human and natural environment through sound science, improved planning, public

education, and community-based actions. We firmly believe that reasoned, science-informed approaches to reducing risks to human life and property will also be widely compatible with maintaining the health of the remarkable fire-adapted ecosystem we live in.

Purpose of Forwarding These Reviews

The attached reviews were authored by four respected scientists who've published widely on fire ecology, fire history, and methods for reducing fire risks in southern California shrublands. The reviews were not solicited by SDFRN, but were submitted to SDFRN because these scientists wanted their concerns to be heard. We want to be absolutely clear that our purpose in forwarding these reviews to the County is not to embarrass or pillory county staff, but to provide information for your consideration and to air concerns about the quality of information being used to justify critical county decisions about life and property. We also offer some recommendations for improving the quality of information being used. SDFRN firmly believes that the Board of Supervisors and other public decision makers wish to base their decisions on the best available information. We are prepared to work with you to help provide this information.

Major Concerns Regarding the August 2003 Task Force Report

The primary concern of the reviewing scientists is that the report is based on an incomplete, biased, and overly simplistic review of scientific information pertaining to the historical fire regime in San Diego County and the relative effects of various fire risk factors here. This inadequate review appears intended to support landscape-scale vegetation management, which would waste scarce financial resources and may actually do more harm than good in preventing future wildfire disasters. The report ignores a number of considerations crucial to preventing structure losses and allocating scarce resources for optimal risk reduction.

The bibliography of the document is substantially incomplete and is biased toward references supporting a view that landscape-scale fuel reductions are required to reduce risks of catastrophic wildfires in San Diego shrublands. Many of the supporting references are newspaper articles or op-ed pieces, leaflets, and other such anecdotal references as opposed to credible, peer-reviewed, scientific papers. This is especially surprising given the large and growing body of relevant scientific literature published in books and prestigious scientific journals (including *Science*, *Ecology*, *Conservation Biology*, *Environmental Management*, and *International Journal of Wildland Fire*). Many of the references in the bibliography cannot even be traced, due to incomplete citations (e.g., missing dates, journal titles, and issue numbers). Others appear to be fabricated (which we hope is just an error rather than intentional). For example, the only reference listed for Dr. Jon Keeley (a leading fire scientist with the U.S. Geological Survey and UCLA whose scientific findings are seriously misrepresented in the report) has a fictitious title and combination of coauthors, despite the fact that Dr. Keeley has published more than a score of peer-reviewed and directly relevant research papers and

book chapters. Key studies by other scientists, including C.J. Fotheringham (UCLA), Max Moritz (Cal Poly San Luis Obispo, recently moved to UC-Berkeley), Jack Cohen (US Forest Service Intermountain Fire Sciences Laboratory), Paul Zedler (formerly SDSU, currently University of Wisconsin), Susan Conard and David Weise (US Forest Service Riverside Fire Laboratory) and many others are totally ignored—while the results of still others, like UCLA statisticians Frederic Schoenberg and Roger Peng, are seriously mischaracterized, as these researchers explain in their attached review.

Overall, the Task Force report does not do a credible job of reviewing the complex issue of vegetation management as it pertains to reducing risks of catastrophic wildfires in shrubland ecosystems. It contains numerous errors of fact and interpretation, it mischaracterizes the conclusions of various studies, it misrepresents important fire-history data, it ignores crucial differences in fire behavior and history among different vegetation communities (e.g., coniferous forest versus coastal sage scrub or chaparral), and it grossly oversimplifies the complexities of how fuels, weather, human fire starts, and vegetation management actions interact to influence fire risks in San Diego County.

Recommendations for Moving Forward

These deficiencies can and must be rectified. We therefore respectfully request that:

1. The County withdraw the report, *Mitigation Strategies for Reducing Wildland Fire Risks*, August 13, 2003, from further consideration as a basis for decisions on wildland management in San Diego County and replace it with a new report that comprehensively and objectively reviews all available information. The new report should address, based on the best available information, the most effective, cost-efficient, and sustainable approaches for reducing risks to human life and property at the wildland-urban interface.
2. In the interest of governmental transparency and accountability, future reports should list authors and task force members by name. The way the existing Task Force report lists agencies and stakeholder organizations that served on the task force (see Attachment II of the Task Force report) seems to imply endorsement by these entities, which is highly misleading. A number of individuals who served on that Task Force have stated that they did not review, approve of, or endorse the content of the report, and that they are deeply troubled by the implied endorsement by their organizations.
3. Any future reports, on this or any other issue that demands synthesis of scientific or technical information, should be subject to independent scientific peer review. Proper peer review of the Task Force report would have revealed significant deficiencies and errors *before* they were used to justify policy positions. It would also have made for a much stronger set of recommendations for how to protect lives and property in San Diego and how best to allocate scarce financial resources.

Concluding Remarks

We offer these comments with the most constructive intent possible. We wish to work with the County to improve the quality of information guiding critical policy decisions. Preliminary discussions with key county staff, including the fire marshal, fire services coordinator, and other officials in the Department of Planning and Land Use, indicate they have a sincere desire to consider the best available information and to move forward with reasoned, science-informed plans. We are encouraged by these discussions, and stand ready to help the county in any way you think useful.

In closing we note that SDFRN (with sponsorship from the Cleveland National Forest, San Diego Natural History Museum, The Nature Conservancy, Conservation Biology Institute, Jones and Stokes Associates, the Wildlife Research Institute, and perhaps other organizations) is planning an open fire science workshop for Spring 2004 (tentatively, March 16, 17, 22, or 23), which will focus on the most effective ways of managing vegetation and the human-built environment to reduce risks of catastrophic wildfire associated with our shrubland landscapes. We sincerely hope that county officials will participate in this workshop and help to translate its findings into improved policies.

It is in that spirit that we ask you to consider our comments and recommendations. Please contact Dr. Anne Fege (707-562-9194) or Dr. Wayne Spencer (619-296-0164) with any questions or concerns regarding these matters.

Sincerely,



Wayne D. Spencer, Ph.D.
Senior Conservation Biologist, Conservation Biology Institute
Chair, SDFRN Policy and Planning Committee

Signed on behalf of the Steering Committee of the San Diego Fire Recovery Network:

Anne Fege, Ph.D., Forest Supervisor; Cleveland National Forest; Chair SDFRN
Scott Fleury, Ph.D., Conservation Biologist; Co-chair SDFRN Data
Management/GIS Committee

Bruce Goff, Ph.D., Senior Watershed Hydrologist, Sullivan Consulting Group;
SDFRN Coordinator

Mary Ann Hawke, Ph.D., San Diego Natural History Museum; Co-chair SDFRN
Monitoring and Assessment Committee

Jeffrey L. Lincer, Ph.D., Director of Research, Wildlife Research Institute; Co-
chair SDFRN Monitoring and Assessment Committee

Joey Betzler, Ph.D., San Diego Zoological Society; SDFRN Communications Committee

Angela Johnson, URS Corporation; Co-chair SDFRN Data Management/GIS Committee

David Younkman, Chair SDFRN Education and Outreach Committee

Michael Klein, Klein-Edwards Professional Services; Co-chair SDFRN Assessment and Monitoring Committee

Geoffrey Smith, Sierra Club; Chair SDFRN Volunteers Committee

Jim Peugh, Conservation Chair, San Diego Audubon Society

Attachments: Comment letters by Dr. Jon Keeley, Ms. C.J. Fotheringham, Dr. Frederic Schoenberg, and Dr. Roger Peng.