Laguna Greenbelt, Inc. a non-profit corporation

January 10, 2018

Via E-Mail

Edith Hannigan, Board Analyst
Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460
VegetationTreatment@bof.ca.gov

Re: Vegetation Treatment Program Recirculated Revised Draft Program Environmental Impact Report

Dear Ms. Hannigan,
We are stakeholders for lands that appear to be within a VTP 'modeled fuel break treatment' area, but we were not notified about the comment period for the DEIR, as CEQA requires. We ask CalFire to extend the review period on the VTP DEIR so that we and other groups similarly overlooked can better review it and submit comments.
Thank you.

Laguna Greenbelt, Inc., is a grassroots public benefit corporation, celebrating its 50th year of successful advocacy for the protection of habitat lands in the central coastal canyons of Orange County. The expanded Laguna Greenbelt currently totals 22,000 acres of wilderness parks and preserves that border six cities.

We are obviously very concerned about the impacts of massive vegetation destruction of critical wildlife habitat in the name of fire protection. The group feels strongly that up to date fire science does not call for tdestroying native habitat; and that the proposed plan ignores real solutions.

The disastrous Laguna Beach fire on October 27, 1993, burned 16,000 acres, including over 400 homes destroyed or damaged. The fire was deliberately set on a very windy Santa Ana day north of town by the side of Laguna Canyon Road. Cost was about 528 million dollars. What follows is what the town learned from that disaster.

What didn't work

Prior controlled burning of native vegetation

In the 1993 Laguna fire, the flames had to cross a large area above (upwind) of Emerald Bay that had been treated fewer than 5 years before. The whole area burned, and the flames raced down into Emerald Bay and a nearby trailer park through a ravine that channeled the wind gusts.

*Firebreak**s***

The revised VTP EIR at A2.9 shows what appear to be firebreaks on the main ridgelines throughout the entire Greenbelt. Our experience with firebreaks is that they lead to *more frequent fires* due to flash fuel conditions by the remains of nonnative annual plants that colonize any soil disturbance such as bulldozer tracks.

A hillside near the intersection of Canyon Acres and Laguna Canyon Road burns frequently, and has suffered a lot of fuel break bulldozing. The electrical utility pole is the cause of all ignitions (about 6 in 30 years); either by electrocuting hawks, sparking from failing transformers, and in one case being knocked down by a car.

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In the immediate postfire panic, the city decided to add goat grazing for preventive destruction of native shrubs. Every biologist in town testified that the goats would convert the grazed habitat from native perennial shrubs that burn only during extreme weather to annual nonnative weeds. The weeds die off in the dry season, leaving flashy fuel that catches fire much more easily and has the potential of burning every year. Laguna Beach was soon surrounded with a dangerously flammable strip of weeds that must be removed every year. The city in effect pays the goat herder to feed his flock and gets nothing in return.

What works:

. *Fireproofing the houses first*, then the yards and landscaping, before deciding to demolish the landscape.

The media called it the 'miracle house' in the Mystic Hills neighborhood. It was built to withstand fire, and was the only house on that hillside to survive, while dozens around it burned. The design–no external wood, no eaves, fireproof roof, no curtains, etc., allowed the house to survive the flame front as it passed by, burning all the neighboring homes.

My house survived due to its new fireproof roof, while all the neighbors across the one lane street burned. One could clearly see where burning embers had fallen on the roof and melted the glass balls in a number of places. On a gusty day burning embers can be blown two miles or more in front of the fire. If the house is well prepared, it survives.

Undergrounding utility poles. My whole neighborhood along a ¾ mile road burned except for nine houses. The fire trucks would not enter the neighborhood once the lines fell down across the road. Finally, a couple of neighbors chopped the downed lines with axes and dragged them off the roadway.

Preventing ignition/ by 'hardening' roadsides. In SoCal, about 9/10 of ignitions are caused by humans, intentionally or accidently, and most ignitions begin at the side of a road. A local non-profit has organized roadside monitors who patrol back country roads on fire danger days. Placing concrete barriers in the shoulder prevents accidental ignition from cigarette butts tossed from car windows.

Reducing development in the WUI and other fire-prone areas
California's 2017 fall fires were unique in that horses were killed. This probably indicates semi-rural lots, also known as the WUI, around the periphery of more dense urban development. In a sense, every electric utility pole is also the WUI.

Fire ecologists can identify fire-prone areas, like wind funnels and ridgetops, where the risk of fire is more than average. These areas should be mapped and kept off-limits to development. The federal government FEMA maps indicate where the flood risk is high, and there are special regulations for structures in those areas. There's no reason we shouldn't treat high fire risk areas the same way.

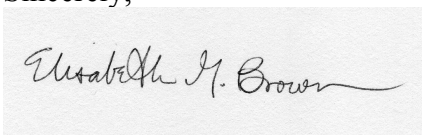
Why do trees survive but houses burn? We see this often in photos of burned out neighborhoods. Ours was no exception. The dense growth pattern of Scrub Oak and the fire-resistant bark of Coast Live Oak often defeat the flames. More trees than houses survived in our neighborhood.

Cities burn. Thirty out of town firetrucks came to Laguna one night to help with a fire on the hill above our neighborhood. The crews had just finished fighting a large apartment complex fire in Anaheim's Apartment Fire. Not trees, buildings.

Final Thoughts
Life on this planet is tough and resilient. Something will replace the deep rooted fire-resistant natives that the VTP destroys. Shallow-rooted European weeds, fertilized by NOX deposition will replace the Coastal Scrub communities. And they will burn every year.

Thank you for considering these comments. Please keep us informed about this project.

Sincerely,



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PS
Attached is a map of fires in the Central subarea of the Orange County NCCP/HCP. Some areas burn frequently; others don't. Fire ecology tells us that location is a big factor in fire susceptibility, and sources of ignition is another big factor.