



Resource Conservation District of Greater San Diego County  
11769 Waterhill Rd., Lakeside, CA 92040  
Phone: (619) 562-0096 ✨ Fax: (619) 562-4799  
Website: [www.rcdsandiego.org](http://www.rcdsandiego.org)

October 30, 2015

California Board of Forestry and Fire Protection  
PO Box 944246  
Sacramento, CA 94244-2460

Re: Vegetation Treatment Program

To whom it may concern:

In review of the Draft-Program Environmental Impact Report, the Vegetation Treatment Program lists five objectives:

1. "To modify wildland fire behavior to help reduce losses to life, property, and natural resources;
2. To increase the opportunities for altering or influencing the size, intensity, shape, and direction of wildfires within the wildland urban interface;
3. To reduce the potential size and associated suppression costs of wildland fires by altering the continuity of wildland fuels;
4. To reduce the potential for high severity fires by restoring and maintaining a range of native fire-adapted plant communities through periodic low intensity treatments within the appropriate vegetation types; and
5. To provide a consistent, accountable, and transparent process for vegetation treatment that is responsive to the objectives, priorities, and concerns of landowners, local, state, and federal governments, and other stakeholders." (E-3) Draft-Program Environmental Impact Report.

The VTP also seeks to prevent major impact on the environment and states that "vegetation treatment activities will be implemented primarily on privately owned land within the SRA. VTP projects would only be implemented in cooperation with voluntary and willing landowners." (E-4) Executive Summary. This document also repeatedly states that "project planning and implementation is best served through open communication with stakeholders, and that mechanisms for reporting VTP outcomes to the public is crucial." (E-4) Executive Summary, Draft-Program Environmental Impact Report.

I would like to offer that all of these objectives can be accomplished readily, and with success, by utilizing existing environmental partnerships, agencies, and local stakeholders throughout the state that are also working toward these goals. These agencies consist of Resource Conservation Districts (RCDs), the Natural Resource Conservation Services (NRCS), local Fire Safe Councils, as well as local, state, federal, and tribal agency partners who have come together in response to devastating wildfires and who have met in an environmentally sensitive manner the objectives and scope of work that the VTP Program seeks to accomplish. One prime example of success in achieving this objective is seen through the partnership of the Resource Conservation District of Greater San Diego County (RCDGSDC) and the Fire Safe Council of San Diego County (FCSDC).

First I would like to offer some background on Resource Conservation Districts (RCDs). RCDs are Special Districts formed by President Roosevelt in response to the devastating effects of the Dust Bowl. Today, there are approximately three thousand RCDs within the nation and approximately ninety-eight

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within the state of California. RCDs are quasi-governmental/non-regulatory agencies separate from county, state, and federal agencies. RCDs are local agencies charged with the adoption of conservation practices within their communities' realm. Some of these activities include: farmlands, open space, urban conservation management, wildlife protection and habitat, watersheds, and woodland resources. Funding for RCDs is obtained through private and public grants, donations, contributions, property taxes, and fee for service programs.

The RCD of Greater San Diego County (RCDGSDC) is the largest RCD in San Diego County whose territory encompasses approximately 2,886 square miles or 1,847,000 acres. As mentioned, RCDs focus on the environmental concerns of their territories; in San Diego County, wildfires are our greatest threat. In 1997, the RCDGSDC as well as federal, state, local, and tribal fire agencies came together to form the Fire Safe Council of San Diego County (FSCSDC) to offset the devastating effects of San Diego wildfires. These agencies include: CALFIRE, BLM, USFS, USFWS, San Diego County Fire Authority, Viejas Fire, and NRCS to name a few. The FSCSDC was established as a 501C3 in 1999 and exists to serve the community with the following programs:

- Development and support of local fire safe councils (thirty-eight active) in San Diego County
- Defensible space and fire prevention training
- No-cost private and community chipping days
- Defensible space clearing
- Development of Community Wildfire Protection Plans (CWPPS)
- Fire agency support services
- Bi-monthly meetings, workshops, and other fire trainings
- Community outreach

These programs are funded through federal, state, and local grants and the programs and the funds of the FSCSDC are managed by the staff of the RCDGSDC with oversight from the Executive Board of the FSCSDC and the Board of the RCDGSDC. The program outcomes have been so successful that the RCD/FSCSDC has been offered long term agreements and funding by other regulatory agencies such as the Cleveland National Forest and the San Diego County Fire Authority. The Grants Clearinghouse, who manages the USFS grants, also directs other grantees who wish to manage federal funds to the RCD/FSCSDC as well. Other RCDs throughout the state are now seeking to establish their own fire safe councils to assist their communities in wildfire prevention as well. The NRCS has also stepped in to fund Foresters who will aid the RCDGSDC in developing conservation plans that promote and support wildfire defensible space within communities as well as other wildfire prevention work on federal lands.

Like RCDs, the NRCS is a key partner to have. The NRCS works diligently on its conservation objectives to protect native habitat and ecosystems that support the objectives of the VTP. Working in tandem with RCDs and organizations such as the Farm Bureau, Grazing Land Conservation Initiative, and RMAC, the NRCS' objectives support those environmental concerns of a community as well. However, as a federal agency, the NRCS can also provide funding to support these works; funding that RCDs normally cannot provide.

The importance of these outcomes is key to the work that the VTP seeks to address. As a non-governmental agency our RCD/FSC has the ability to interact with landowners in a non-regulatory manner. Our agency partners appreciate that we "can go and reach property owners where they cannot." Whereas these agencies may warn or ticket for defensible space violations within the SRA, we can offer

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these property owners assistance and target areas that our agency partners are trying to affect in an environmentally safe manner. Our partnerships have made wildfire prevention in the San Diego County area successful and have supported the work that CALFIRE and the California State Board of Forestry Protection has sought to accomplish.

In conclusion, reaching out to these environmental agencies can help support the work the VTP is trying to accomplish can only promote a more positive outcome in helping to promote wildfire prevention work. As mentioned, there are approximately ninety-eight RCDs within California and the majority of those RCDs are now concerned with keeping their communities safe from wildfire. Working with outside agencies such as RCDs, the NRCS, and other agencies to develop Fire Safe Councils, Community Wildfire Prevention Plans, and educating the local populations within the WUI/SRA regions can only support the work of the VTP and accomplish it in a more cost-effective and environmentally friendly manner.

Respectfully,

A handwritten signature in black ink that reads "Sheryl L Landrum". The signature is written in a cursive style with a long horizontal line extending to the right.

Sheryl L Landrum, District Manager  
Resource Conservation District of Greater San Diego County