



County of San Diego

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Board of Forestry and Fire Protection
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COUNTY OF SAN DIEGO'S COMMENTS TO THE CALIFORNIA STATE BOARD OF FORESTRY AND FIRE PROTECTION'S PROPOSED REGULATIONS TO ADOPT THE STATE RESPONSIBILITY AREA FIRE PREVENTION FUND GRANT PROGRAM

On March 2, 2016, the California State Board of Forestry and Fire Protection (Board) provided a public comment period for the propose rulemaking to establish the State Responsibility Area (SRA) Fire Prevention Fund Grant Program (Program). The County of San Diego (County) appreciates the opportunity to comment regarding potential effects resulting from these proposed changes. There are numerous community parks, businesses, residential areas, roadside plantings, and open spaces within the State Responsibility Areas (SRAs) in San Diego County that have large numbers of dead, dying, or diseased trees. This high level of tree mortality is the consequence of the invasive pest infestations, involving Gold Spotted Oak Borer and Invasive Shot Hole Borer, and prolonged drought. This situation generates significant fuel loads to spreading wildfires and constitutes a major threat to public health and safety, critical infrastructures, and the environment. The County supports the proposed Program and requests that the issues highlighted below be addressed through revisions to the proposed rule.

1. Allows for a two-phase Concept Proposal relating to the proposed Sections 1666.4(d) - Qualifying Fire Prevention Planning Project, and 1666.4(e) - Other Qualifying Projects in the proposed text. The first phase includes the initial research and data collection from affected parties such as community planning groups, school, fire, and water districts, parks and public works departments, homeowner associations, conservancy groups, habitat managers, and others. GIS technology may be used to generate useful maps that identify critical areas of concern. The second phase includes identifying the specific approaches to effectively and efficiently address these areas. This approach may benefit many other counties within the State.
2. Clarify the following items in the proposed Section 1666.1 Definition section:
 - a. The person who would be the Reviewer and how this person would determine that a Concept Proposal is complete and approves grant funding.

- b. The person who would be the Evaluator and how this person would interpret the requirements of the Program and apply the 100-point system
 - c. Allow an opportunity for the applicant during the review process of the Concept Proposal to add information and make changes that might circumvent a 'no' response from the Reviewer.
 - d. The difference between qualifying and non-qualifying projects.
 - e. California Strategic Fire Plan, CAL fire Unit Fire Plan, Community Wildfire Protection Plan, and County Fire Plan.
 - f. The appropriate project deliverables and the metrics to measure success
 - g. The time frame in which the invitation-to-apply letter would it be sent during the application process
 - h. The time frame for a Concept Proposal review and notification of acceptance.
 - i. The time frame for a Project Application review, notification of approval and funding availability.
 - j. The method for inviting successful Concept Proposal applicants to submit a Project Application.
 - k. A checklist of necessary forms that eligible applicants may use in ensuring a complete submittal.
3. San Diego County Department of Parks and Recreation (County Parks) currently has several active labor contracts with CAL FIRE for vegetation management and fuel reduction both inside and outside of SRA areas to maintain park lands. We would like to continue to contract with individual Cal Fire camps for this service.
 4. Allow grant funding under the proposed process to include fuel reduction measures outside the SRAs to address invasive pest issues in the Tijuana River Valley and San Luis Rey Parks. These invasive pests may not be a direct threat to specific SRAs yet, there still would be impact to CAL FIRE resources in the event of major fire in areas infested by GSOB and SHB.
 5. Allow an agency to submit more than one grant proposal for fuel reduction projects in different areas of the County. Allow for better coordination and continuity of fuels projects across local jurisdictional boundaries (fire agencies, fire safe councils, etc...)
 6. Allow extra points for projects related to Gold Spotted Oak Borer, Invasive Shot Hole Borer and other invasive tree pests, resulting a priority ranking in the evaluation process.
 7. Allow for fuel reduction measures outside of the SRAs if they address pests that are likely to spread to the SRAs.
 8. Expand criteria for eligible applicants to include organizations and industries regardless of their history or mission related to fire and fuel management. This would allow the agricultural sector to focus on reducing the fire risk in groves (i.e. citrus and avocado groves in San Diego County that have been neglected or abandoned with dry dead trees as a consequence of invasive pest infestations and prolonged drought). Focus should be on the benefits and scope of project and the organization's capacity to implement the proposed projects.

9. Expand criteria for eligible proposals to include pre and post fuel reduction work (e.g. research, survey and mapping, resource development for management decision tools, recovery and restoration projects).

10. Expand criteria for eligible proposals to include properties, such as groves/agricultural lands, that are in between or adjacent to habitable structures or can cause a fire to spread from one community to another. This has been a major problem in San Diego County in previous firestorms.

The County appreciates the opportunity to comment on the proposed regulations and respectfully submits these comments and recommendations for consideration to the proposed rule. Should you have any questions regarding the comments and recommendations provided, please contact Travis Elder at (858) 752-4700, or via email at Travis.Elder@sdcounty.ca.gov.

Regards,



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County Agricultural Commissioner

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