



CALIFORNIA
NATIVE PLANT SOCIETY

LATE DISTRIBUTION

DATE 4/26/2019

BOS 4/30/2019

#11

April 26, 2019

Board of Supervisors
El Dorado County
330 Fair Lane
Placerville, CA 95667

Re: Comments on Agenda Item 19-0630 on the April 23, 2019 Agenda, Relating to the Proposed Vegetation Management Ordinance.

To the Board of Supervisors:

Thank you for incorporating changes to the draft vegetation management ordinance that address our concerns, expressed in a letter dated April 24, 2019, about including certain species and plant communities in the definition of weeds.

We have continued to review this important ordinance and offer this additional feedback about native plants and other vegetation that occur within 100 feet of homes.

We are concerned that there is still an unwarranted focus on native plants as fire hazards. We offer the following revised wording that addresses our concerns and focuses on the condition and nature of the vegetation when characterizing "hazardous vegetation."

1. Hazardous Vegetation definition

Current wording of the ordinance, as recently revised:

Hazardous Vegetation means vegetation that is flammable and endangers the public safety by creating a fire hazard including but not limited to seasonal and recurrent weeds, stubble, **brush**, dry leaves, needles, tumbleweeds, and **chaparral, sagebrush, manzanita**, and under growth vegetation.

We have underlined and bolded the wording about which we are concerned and address below.

Recent California fires have shown that it is not native vegetation at a distance from homes that is as much a hazard to homes as is the vegetation near homes. Much of that vegetation is actually non-native and purposely planted, and some of those

plants are highly flammable and a very real hazard. If the ordinance intends to name specific species of plants as hazardous, then highly flammable plants such as juniper, fountain and pampas grass, rosemary, and broom should also be included. Flammable ornamental plants, especially when planted in mass as they often are, can be much more hazardous vegetation types than a well maintained single manzanita specimen 75 ft from a house for example. To call out these two native plants, manzanita and sagebrush, and an entire plant community, chaparral, as hazardous vegetation while ignoring the many other hazardous species is confusing and not effective for providing relevant guidance for fire safety. We suggest instead that the ordinance refer “flammable plant species” as the target of concern and then provide lists of flammable plants on the County’s website and at the Planning Department.

A second concern is with the broad use of the term “brush” as hazardous vegetation. As I presented at one of the public meetings, single specimens or small islands of shrubs spaced well from other vegetation are not hazardous in and of themselves, especially when not acting as ladder fuel to any tree. Lumping all “brush” as hazardous does not make sense. Shrubs can have high value to many homeowners, as well as high habitat value, and can be well maintained as non-hazardous specimens. By contrast, trees can be very hazardous, especially dense groupings of small, flammable ones like incense cedar often found in the county. Broad lumping of “brush” as “hazardous,” but trees as not hazardous, is not useful.

To address these two concerns, we suggest the following changed wording for the ordinance:

Hazardous Vegetation means vegetation that endangers the public safety by creating a fire hazard including but not limited to seasonal and recurrent weeds over 4 inches high, thick accumulations of dry leaves and needles, vegetation that is dense and/or poorly maintained, and vegetation known to be inherently flammable, whether native or ornamental.

As a resource to support the County’s implementation of the ordinance, we recommend distributing or making available to homeowners and developers the list of flammable plants published by the Diablo Fire Safe Council because it includes plants that at least three references consider flammable. Another excellent list of flammable plants common to our area is that of the Marin Fire Safe Council. Links to both lists are provided in the reference section below (B and C)

2. Defensible space distance Section 8.09.070 F, 1a

Recent California fires such as the Camp and Tubbs fires have also shown that homes themselves act as fuel when closely spaced such as in subdivisions. That is where our county is at great risk of losing substantial numbers of homes in a single fire, and that is also where flammable ornamental plants are often found. Those

plants are often right up against a house or within the first 5 feet, a critically hazardous place it has been shown. Science shows any vegetation in this zone greatly decreases fire safety (Syphard et al, 2013, cited below). We are also aware of legislation introduced this year (AB 1516; https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB1516) that would revise defensible space requirements (PRC 4291) to include a non-combustible zone within 5-feet of a structure. We ask that the critical nature of this zone to fire susceptibility be addressed in the ordinance.

The state currently uses 2 zones, 30 feet and 100 feet, and the ordinance combines those as a single 100 foot zone to give better safety. **We recommend adding a second zone to the ordinance by calling out the critical first 5 feet around a residence that should have significantly reduced vegetation, to more effectively reduce the risk of property loss to fire.**

Thank you very much for considering my comments. Please contact me if you have any questions about these comments (530-651-4565; alicecantelow@gmail.com).

Sincerely,



Alice Cantelow
President
El Dorado Chapter, California Native Plant Society

CC: Creighton Avila, Deputy CAO

References Cited

- A. *The role of defensible space for residential structure protection during wildfires*, 2013, A.D. Syphard et al (Conservation Biology Institute, US Geological Survey Western Ecological Research Center, UCLA) (literature review paper)

Excerpt concerning hazards of non native plants:

“In addition to the importance of vegetation overhanging or touching the structure, it is important to understand that ornamental vegetation may be just as, if not more, dangerous than native vegetation...”

Excerpt concerning the 5 foot zone:

“Considering the importance of defensible space and vegetation modification immediately adjacent to the structure, it should follow that actions to reduce cover should also be focused in close proximity to the structure. The hazard of vegetation near the structure has apparently been recognized for some time (Foote et al. 1991; Ramsey and McArthur 1994), but it is not stressed enough, and rarely falls within the scope of defensible space guidelines or ordinances.

B. *“Table 2. Plants with an unfavorable fire performance rating in 3 or more references”*, Diablo Fire Safe Council,
<http://www.diablofiresafe.org/tolerance.html> (scroll down to table 2)

C. *Fire-Prone Plants*, Marin Fire Safe Council,
www.firesafemarin.org/plants/fire-prone

Natalia A. Blackburn
5040 Cothrin Ranch Road
Shingle Springs, CA 95682
nblackburn@zetabroadband.com

April 29, 2019

Board of Supervisors
El Dorado County
330 Fair Lane
Placerville, CA 95667

Re: Revised Vegetation Management Ordinance - comments

To the Board of Supervisors:

I support your efforts to reduce the impact of wildfires on the people of El Dorado County. Though the understanding of fire is evolving, I am learning that for many parcels it is more important how we “fire harden” our structures and deal with vegetation and woodpiles very near the structure than how we clear beyond 30’ from our house.

Though this ordinance does not encompass building construction and materials, it could more clearly cover the very flammable landscaping plants that we place near our house. The revised ordinance defines chaparral, sagebrush, and manzanita as “hazardous vegetation”, yet does not include juniper shrubs which fire people jokingly refer to as “those little green gas cans” that are planted right next to the backdoor. More and more I am seeing the recommendation of keeping the 5’ around your house clear – period. Are we ready to include a 5’ zone “no plant” zone in this ordinance? -Perhaps in time this will be the norm.

I would delete chaparral, sagebrush and manzanita from the hazardous vegetation definition since it is not hazardous when it is maintained. Paragraph F1 (a) would require that it be maintained, the same as juniper, rosemary, pampas grasses, and other landscape plants which are not specifically listed as hazardous in the definitions, but surely can be. (I am in the process of moving our beautiful 30 year old rosemary hedge away from under our windows.)

I would also have staff review the definition of “weeds”. Several of the listed items have a circular reference: “Weeds include weeds which bear seeds...” Should it be “weeds include vegetation which bears seeds...”? Also should “fuel ladder” be listed under weeds or have its own definition?

To summarize, I am concerned that there has been a carte blanc labeling of several native shrubs as “hazardous”. These plants are important animal habitat. They are especially important to our pollinators. These are some of the reasons why I live here. My 10 acres near Latrobe includes oak woodland and chaparral. My goal would be for it to be species rich creating a mosaic, and reducing the spread of wildfire.

Sincerely,

Natalia A. Blackburn

Property Owner, also
Member of El Dorado Chapter,
California Native Plant Society (CNPS)

Copy:
Elaine Gelber, Assistant to Supervisor Frentzen
Lester Lubetkin, Advocacy, El Dorado Chapter, CNPS