

PACIFIC STATES  
DEVELOPMENT  
CORPORATION

#5  
OWMP  
15/ND

3/10/08 PM 4:29

RECEIVED  
PLANNING DEPARTMENT

March 4, 2008

El Dorado County Planning Services  
Attn: Monique Wilber  
2850 Fairlane Ct.  
Placerville, CA 95667

Re: Comment regarding Final Draft OWMP Policy 7.4.4.4A Existing Structure Defensible Space/ Fire Safe Measures (pgs. 5-6 Final Draft OWMP)

Ladies and Gentlemen:

In Staff's Status Report dated January 16, 2008 (pg.3) it was first suggested that in order to recognize that not all vegetation is removed in the defensible space zone, an assumption be made that 20% of the tree canopy is typically retained in the 30' to 100' zone around structures.

At first glance I liked this idea of using a ratio because it allowed flexibility and a way to minimize specific calculations for each lot at the tentative map stage.

However, upon further analysis of this issue I have concluded that while a ratio may be a good tool, an assumption of only a 20% tree canopy retention is exceedingly low, and should be revised to something like 70 or 80%. Alternatively an applicant could do a more detailed analysis, for example in a case where the defensible space contains only 30% tree canopy, and could retain 100% or close to it.

A common theme in Public Resources Code Section 4291 et seq., the guidelines published by the State Board of Forestry and Fire Protection (BOF), the California Department of Forest and Fire Protection (CDF) and the El Dorado County Fire Prevention Officers Association is that defensible space can be created by fuel modification and not necessarily cutting down trees.

This is especially true in local responsibility areas, like El Dorado Hills and Cameron

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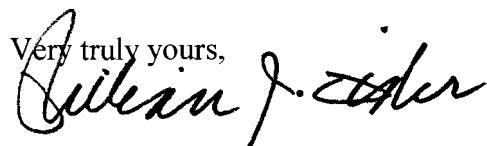
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Park, etc. where most of the development in the County will occur. In these areas a Fire Safe Plan is typically prepared by a Registered Professional Forester and reviewed by the local Fire Marshall. The reports typically recommend that defensible space be created by removing dead vegetation and/or certain shrubbery, native oak trees be pruned up to 6-8 feet above the ground, and foliage be kept 10' away from the roof and removing all branches near chimneys. They recommend that live trees (except gray pines) remain in Zone 1 (0-30') and Zone 2(30-100') (See Appendix A, and B from typical Fire Plan in El Dorado Hills).

An assumption that only 20% of the oak tree canopy will be retained in new subdivisions and parcel maps is erroneous based on the clear State and local policies to achieve defensible space without necessarily cutting native trees.

A standard ratio for flexibility and ease of design is a good concept but should be revised upward to perhaps 70-80% as anticipated retention in the defensible space around future building pads or sites. Further, an applicant should, as an option, be allowed to do a site analysis to determine more accurately how much retention will actually occur.

Thank you for the opportunity to comment on this issue.

Very truly yours,  


William J. Fisher  
President

/rb  
enc.

## Appendix A

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### **FIRESCAPING STANDARDS**

Firescaping is an approach to landscaping to help protect homes from wildland fires. The goal is to create a landscape that will slow the advance of a wildfire and create a Defensible Space that provides the key point for fire fighting agencies to defend the home. This approach has a landscape zone surrounding the home containing a balance of native and exotic plants that are fire and drought resistant, help control erosion, and are visually pleasing. Firescaping is designed not only to protect the home but to reduce damage to oaks and other plants.

#### **Zone I**

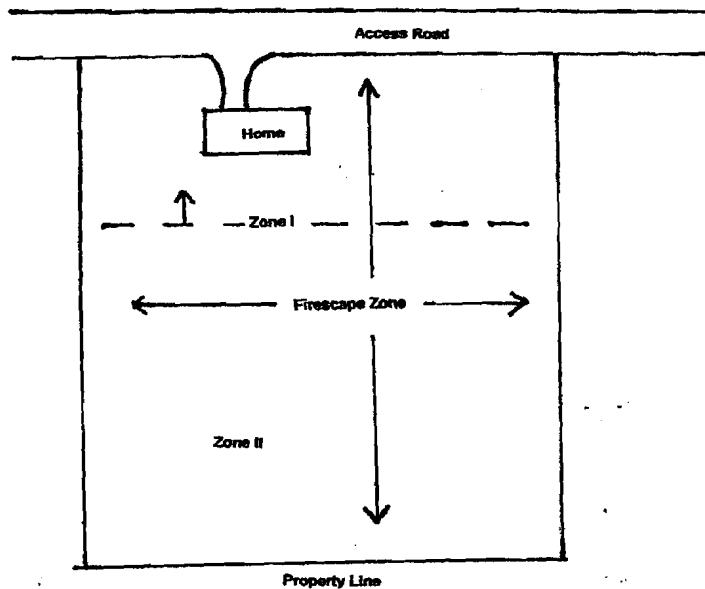
The zone extends to not less than 30 feet from the house or to the **property line** in all directions and has a traditional look of irrigated shrubs, flowers gardens, trees and lawns. All dead trees, brush, concentrations of dead ground fuels (tree limbs, logs etc. exceeding 1inch in diameter) are removed. All native oak trees and brush species are pruned up to 6-8 feet above the ground as measured on the uphill side but no more than 1/3 of the live crown. The plants in this zone are generally less than 18 inches in height, must be slow to ignite from wind blown sparks and flames. Such plants produce only small amounts of litter and retain high levels of moisture in their foliage year around. Native and exotic trees are permitted inside the Zone except for Gray pines, but foliage may not be within 10 feet of the roof or chimney. Grass and other herbaceous growth within this zone must be irrigated or if left to cure must be mowed to 2 inch stubble, chemically treated or removed. Such treatment must be accomplished by June 1, annually. This zone has built in firebreaks created by driveways, sidewalks etc.

#### **Zone II**

This Zone adds the remaining undeveloped footage of the lot to Zone I, extends from the house in all directions to the **property line** and is a transition area to the outlying vegetation. The zone is a band of low growing succulent and ground covers designed to reduce the intensity, flame length and rate of spread of an approaching wildfire. Irrigation may be necessary to maintain a quality appearance and retain the retardant ability of the plants. All dead trees, brush, concentration of dead ground fuels (tree limbs, logs etc.) exceeding 2 inches in diameter are removed. Annual grasses are mowed after they have cured to a 2 inch stubble by June 1, annually. Native trees and brush species are preserved and pruned of limbs up to 8 feet above the ground as measured on the uphill side. Gray pines are not permitted to remain in this zone.

**APPENDIX A-1**  
**FIRESCAPING ZONES**  
**EXHIBIT**

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**Typical Lot in Oak Woodland**  
(schematic, no scale)

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## APPENDIX B

### FUEL TREATMENT SPECIFICATIONS

For

#### OAK WOODLAND VEGETATION

##### Within The Designated Fuel Treatment Areas

1. Leave all live trees EXCEPT Gray pines.
2. Remove all dead trees.
3. Remove all brush.
4. Prune all live trees of dead branches and green branches 8 feet from the ground as measured on the uphill side of the tree, except no more than 1/3 of the live crown is removed. All slash created by pruning must be disposed of by chipping or hauling off site.
5. Annually by June 1, reduce the grass or weeds to a 2 inch stubble by mowing, chemical treatment, disk ing or a combination of treatments.
6. Mature, multi stem Live Oak trees: remove all dead limbs and stems, cut off green limbs at 8 feet above the ground as measured on the uphill side that arch over and are growing towards the ground.

## APPENDIX C

### ENCLOSED DECK GUIDELINES

The purpose of enclosing decks that are cantilevered out over the natural slope is to help prevent heat traps and fire brands from a wildfire igniting the deck or fuels under the deck.

1. Does not apply to decks that are constructed using fire resistant materials such as concrete, steel, stucco etc.
2. Applies to decks one story or less above natural slopes.
3. Combustible material must not be stored under the deck.