



**LATE DISTRIBUTION**

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EDC COB <edc.cob@edcgov.us>

**re: Vegetative Management Ordinance (proposed)**

1 message

Tom Castro <tcastro08@gmail.com>  
 To: edc.cob@edcgov.us

Tue, Apr 30, 2019 at 7:34 AM

Dear Board Members,  
 I wish that you consider my concerns regarding this ordinance.

In addressing specific plants that are unsuitable for fire protection in this ordinance there are at least the following major flaws.

Attempting to identify target problem plants:

- 1 All fire hazard plants cannot be named. Nurseries everywhere in the entire state of California are selling these and adding new species and varieties all the time. This ordinance could not possibly address all of these plants by name. The ordinance will be incomplete in the time it takes these unnamed plants to grow to hazard size.
2. By *not* identifying ALL specific plants by name, this ordinance is potentially useless and unenforceable. Fire prevention will not occur. For example, a friend in Placerville purchases an imaginary plant (hypothetical) in a San Diego nursery. He gives me a cutting. I plant this non-designated **imaginary** species XYZ from S. Africa which is extremely flammable and can grow to 15ft high and wide, and propagates quickly and seasonally in multiple ways (rooting, cuttings, seed dispersal, etc.). Although I prune and maintain this plant, the escapes (think Broom varieties) become prolific on my property, my neighbors', and along the county road.

When I read the proposed ordinance I envisioned El Dorado County mowed down and a hilly desert-scape.

Attacking the issue of fire from a standpoint of named plants is going in the wrong direction and will not be effective in fire protection for the plants that are allowed to grow because they are not specifically identified in the ordinance.

A. Please keep the ordinance to **subjective** (yes, fire marshal expert subjective) enforcement of **general habitat characteristics**. That is, identify enforcement factors such as distance from buildings and valuable spaces, ignition sources, height/width and maintenance factors, etc.

B. Carefully address "subjective" by writing into the ordinance language that addresses citizen protest:

- i. protest county abatement claim by providing for review to non-county **independent** panel appointed by Supervisors and not by a colleague in the fire marshal's office.
- ii. Be detailed and specific as to the guidelines that the fire inspector must follow.

iii. Address the legal and financial liability of citizens who refuse to cooperate. Use court language that makes it clear that violators are financially responsible for wildfires to which they contribute fuel and expansion.

As I read the proposed ordinance I had a sense that it was also addressing the problem of unsightly properties (trash, old cars, "useless" construction materials, etc., etc.) and not necessarily the potential fire problem. Please eliminate this sense

Finally, the monetary resources of fairly enforcing a truly and county-wide, equitable, apply-to-all fire ordinance, as this is proposed, is wholly not economically feasible. Case in point, the county cannot staff and maintain 24 hr. rural fire stations (e.g. Lotus) providing quick response which is as important as prevention. In addition, some citizens cannot maintain low fuel levels because of physical disabilities, lack of time, financial hardship. These issues must be fairly, responsibly, and practically addressed first.

Sincerely,  
Tom Castro  
Lotus