

# The California Chaparral Institute

*...the voice of the chaparral*

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Devon Muto  
Dept. of Planning and Land Use  
5201 Ruffin Rd., Suite B  
San Diego, CA 92123

RE: San Diego County Draft General Plan

Dear Mr. Muto,

We have a remarkable opportunity to establish a plan for the future of San Diego County that can serve as a model for the rest of California *if* we affirm the fact that conservation of natural resources and the preservation of open space are on equal footing with all the other elements in the General Plan. Unfortunately, this is not the case with the current Draft.

The Draft speaks of “balancing” conservation and open space protection with “future growth and development” (LU-6). This is the same perspective that has led to the destruction of the County’s vernal pools, the loss of endangered coastal sage scrub habitat, and the degradation of the chaparral ecosystem through attempts to reduce fire risk. The term “balance” guarantees that the natural environment will continue to disappear as development continues to consume more of the County’s open space.

Instead of speaking in terms of balance, the Plan needs to clearly state that development must be consistent with the “sustainability” of native ecosystems. We must insure that whatever development occurs in the future, it is done in a manner that is the least impactful to both the human and natural environments. We no longer have the luxury of thinking our wildlands are unlimited. The “sustainability” of native ecosystems and the preservation of open space must be a major guiding principle of the General Plan, not the desire to accommodate development at the expense of natural resources.

The way in which the Draft addresses Fire Hazards also needs improvement. We strongly suggest that the General Plan use SB 1595 (Kehoe) as a model for how defensible space and fuel is addressed. The current Draft language concerning Fuel Management beyond the defensible space zone (Pg. 7-7) appears to be based on outdated perspectives and should be changed. There is inadequate evidence that reducing vegetation beyond the defensible space zone will “improve the survivability of structures.” In fact, there is ample evidence that most homes ignite due to windblown embers that can travel up to 2 miles ahead of the fire front. Conducting vegetation

management activities in an attempt to reduce such risk would involve the elimination of huge areas of native landscape. Such an approach is not an effective or productive way to approach fire risk reduction. The best way to do so is to focus on the wildland/urban interface (WUI).

Finally, the General Plan needs to offer a definitive goal that an adequately funded, coordinated fire protection system of some kind needs to be developed in San Diego County, preferably a County fire department. The need for such a coordinated fire protection system is acknowledged several times in the Draft.

Thank you for the opportunity to comment on the Draft document. We look forward to working with you and the County to help develop a model General Plan.

Sincerely,

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