



20223 Elfin Forest Road
Elfin Forest, CA 92029

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Mr. George Gentry
Executive Officer
California Department of Fire and Forest Protection
VegetationTreatment@fire.ca.gov

RE: Draft Program Environmental Impact Report for the Vegetation Treatment Program (PEIR)

Dear Mr. Gentry:

As a council elected by members of our community, we are tasked with commenting on programs that may affect our community. Today, we are writing to you to state our concerns about the current PEIR for the Vegetation Treatment Program.

About Elfin Forest / Harmony Grove

Elfin Forest and Harmony Grove are located in an unincorporated part of San Diego County. We are blessed with thousands of acres of open space that our community has fought for and acquired over the last 50 years or so. Most people move to our community to enjoy the beauty and tranquility of this open space and to live a rural, residential lifestyle.

The majority of our open space is composed of environmentally-sensitive, low coastal scrub habitat, containing endangered species such as the Coast Horned Lizard, California Gnatcatcher and San Diego Pocket Mouse among numerous others. We are blessed with one of the few remaining undisturbed areas of Coastal Sage Scrub in all of California.

We live in a wildfire prone area and we are well aware of the risks involved in living in such an area. We hold workshops and communicate regularly on fire prevention and good management practices, we have a network of block captains to warn residents about fire danger, we have an example of a fire safe garden at our fire station, and we are always open to common sense measures that will help keep our community safe during wildfires. We welcome any help we can get in this area. However, we have some serious concerns about your proposal.

Vague, Unclear and Without Accountability

The proposed program as stated in the PEIR will target an extremely large area, but it does not specify exact locations or even sub regions smaller than "South Coastal California". It also seeks to reduce "regulatory barriers that limit hazardous fuel reduction activities," which we are concerned would remove our protection as citizens to question methods that might be environmentally damaging and/or destructive of our native landscape. If vegetation management were to happen in our area, we would like full involvement and participation in the process and a chance to weigh in on methods, procedures and locations.

Indiscriminately applying herbicide, grazing, denuding our scrub habitat or grinding would not benefit our community and could push some of our more sensitive species into extinction.

Little to No Citizen Oversight

Additionally, this PEIR is so overly broad and non-specific that it appears to give much latitude to your organization while not providing oversight for any citizen, landowner or stakeholder. This PEIR is also so generalized that it is impossible to measure the impacts on our community, wildlife, endangered species, view-sheds and ultimately our property values.

Wrong Focus

While we believe that vegetation management is an important part of wildfire safety, it should by no means be the only focus. First of all, there is much scientific dispute as to what “vegetation management” means. Creating a defensible space around structures (100 feet) is not the same as grinding down all brush and vegetation in a wide area of natural habitat. There are other organizations that have come to similar conclusions over the years (Endangered Habitat League, Fish and Wildlife, the Chaparral Institute, to name a few). Thus, we DO NOT support entirely eliminating vegetation in large areas of natural landscape, and believe that the focus should be on making a community safer from wildfire damage via education, targeted vegetation management, sustainable practices and lessening the ignitability of structures, among others.

Habitat-Specific Bias

The PEIR seems to take a “forest-based” approach to vegetation management that does not take into consideration the vastly different habitats encountered throughout our great state. The majority of Elfin Forest and Harmony Grove is covered in low brush, chaparral, coastal sage scrub and other low vegetation. A “forest-based” approach would virtually denude our entire community and lead to other long-term problems including excessive erosion, weeds and increased fire danger. Your proposal to “convert habitats” and eliminate “decadent herbaceous vegetation (such as chaparral)” strikes at the very heart of our community, which is surrounded by chaparral and coastal sage scrub.

Elfin Forest was actually named after these low-lying shrubs and chaparral (known as “Elfin Forest”) and they are the very foundation of our community. This PEIR seems to imply that these habitat areas would be “converted” into other habitat via grazing, grinding, prescribed burns or herbicide. These methods would cause environmental damage to our surrounding scrub habitat and would also threaten our way of life. Furthermore, such measures would negatively impact our property values and, in all likelihood, increase the long term fire danger in our community.

Our Perspective

We believe the Board of Forestry should retract the Vegetation Treatment Program EIR and create a program based on the most up-to-date science that considers the entire fire environment including regional differences and allows for independent oversight.

Respectfully,



JP Theberge

Chair, Conservation Committee
Elfin Forest Harmony Grove Town Council