December 1, 2021

Board of Forestry and Fire Protection
Resource Protection Committee
P.O. Box 944246
Sacramento, CA 94244-2460

RE: AB 2911 Subdivision Review Surveys

Dear Board,

The Laguna Beach Fire Department (LBFD), in compliance with AB 2911, has provided the physical locations and GIS shape files for the applicable subdivisions within the City to CAL FIRE staff. We understand that this information was used as the basis of a field survey conducted by CAL FIRE staff, and for recommendations based on that survey. The LBFD was notified that the survey and recommendations were included in a report to the Board of Forestry and Fire Protection (Board).

In reviewing the report recommendations, we have noticed a few items that should be corrected and/or clarified. They are:

- Subdivision ID #21-XOR-6597: The recommendation reflects a water district access gate. The gate leads to the water reservoir and then turns into a dirt fire road that goes through the park system. It would not be suitable for evacuation.

- Subdivision ID #21-XOR-393A: There is a second gate out of the HOA on East Line Road at Coast Hwy. However, it is typically locked closed, and is only used by HOA maintenance staff. It could potentially be suitable for evacuation.

The LBFD recognizes that there is very limited, or no, opportunity to add a second evacuation route from many deficient subdivisions in the city. However, the city is looking at other ways to improve the ability to evacuate. Increasing street width and turnarounds is specifically noted in the City’s Safety Element, and different options are being considered. Undergrounding of utility lines on evacuation routes to remove the hazard of downed poles/wires is also well underway, with long range plans for additional streets and neighborhoods.

In addition, the LBFD would like to point out that we actively manage multiple wildland fire prevention programs in the city. Each program utilizes a different process or method to help increase the wildland fire safety for the community. A list of the programs, including a brief description of each, is provided below.

1) Fuel breaks have been created around many interior and exterior portions of the community to separate the developed properties from undeveloped wildland/open...
space. The fuel breaks are strips of land that have been developed and maintained by using goats or hand crews.

a) There are currently 83 acres of land that are maintained by hand crews in strips that vary in width from 100 to 150 feet. The fuel modification in those areas consists of 50% thinning, removal of invasive plants and dead vegetation. An additional 55 acres of fuel breaks are in the project entitlement process, with permitting expected in mid-2022. This additional acreage is projected for completion in 2024.

b) There are approximately 265 acres of fuel breaks maintained by goats, with the strip width varying from 100 to 300 feet. Goats achieve a much higher reduction of vegetation density / coverage, with up to 80% clearance depending upon slope and plant types.

2) All new construction or major remodel projects on property immediately adjacent to open space / wildland is required to comply with the LBFD Fuel Modification Guidelines and Standards as a condition of approval. This affects approximately 15 parcels per year, with the completed building and property substantially better protected from wildfire than the previous building / open space was. The City is in process of determining the best method of expanding program this to all new construction or major remodels in the entire Very High Fire Hazard Severity Zone (VHFHSZ).

3) The city’s weed abatement program has been in place for over 30 years, with approximately 425 properties currently on the annual abatement list. Staff work closely with the affected property owners, and if the parcel is not cleared by an established date in late spring, the city conducts the abatement and add the charge to the owners’ tax bill. This process is strongly supported by the community, with 100% compliance each year.

4) Many citizen complaints about dead vegetation in the community are lodged each month. Once received, our inspection staff promptly follow up with the property owner. Our compliance rate for removal of dead plants or limbs within 30 days is nearly 100%.

5) The fire department commenced defensible space inspections on properties in escrow, in compliance with Public Resource Code Section 4291, on July 1, 2021. This program was initiated to assist home sellers / buyers in meeting the requirements of Civil Code Section 1102.19 for property in the VHFHSZ. Since 87% of the city is within that zone, we are now conducting many defensible space inspections each month.

6) The LBFD has provided free wildfire consultations for city residents and property owners since the mid-1990’s. Anyone can make a request, and then we send out a staff member to look at the property vegetation and home construction. Non-binding suggestions for improvement in the landscape, roof, decks and windows / doors are offered.
We appreciate the opportunity to clarify recommendations in the report and provide greater detail on city plans to improve evacuation routes and LBFD wildland fire prevention programs.

Thank you,

James Brown

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