

Appendix C-6

Fuel Modification Memo



Rincon Consultants, Inc.

Environmental Scientists Planners Engineers

M E M O R A N D U M

<input checked="" type="checkbox"/> Ventura 180 North Ashwood Avenue Ventura, California 93003 805 644 4455 FAX 644 4240	<input type="checkbox"/> San Luis Obispo 1530 Monterey Street, Suite D San Luis Obispo, California 93401 805 547 0900 FAX 547 0901	<input type="checkbox"/> Carlsbad 2215 Faraday Avenue, Suite A Carlsbad, California 92008 760 918 9444 FAX 918 9449	<input type="checkbox"/> Monterey 437 Figueroa Street, Suite 203 Monterey, California 93940 831 333 0310 FAX 333 0340	<input type="checkbox"/> Santa Barbara 209 East Victoria Avenue Santa Barbara, California 93101 805 644 4455 FAX 644 4240
<input type="checkbox"/> Oakland 449 15th Street, Suite 303 Oakland, California 94612 510 834 4455 FAX 834 4433	<input type="checkbox"/> Riverside 5005 La Mart Drive, Suite 201 Riverside, California 92507 951 782 0061 FAX 782 0097	<input type="checkbox"/> Fresno 255 W. Fallbrook Avenue Suite 103 Fresno, California 93711 559 228 9925	<input type="checkbox"/> Sacramento 4825 J Street Suite 200 Sacramento, California 95819 916 706 1374	<input type="checkbox"/> Los Angeles 706 South Hill Street Suite 1200 Los Angeles, California 90014 213 788 4842

Date: August 12, 2016

To: Nancy Johns

From: Robin Murray, Senior Biologist, Project Manager

Email: rmurray@rinconconsultants.com

cc: Steve Hongola, Principal / Senior Ecologist

Re: City of Los Angeles Fuel Modification Exceptions

The purpose of this memorandum is to describe the results of research conducted by Rincon Consultants, Inc. (Rincon) of the Los Angeles City Fire Department (LAFD) brush clearance requirements as well as fuel modification requirements mandated by the California State Fire Marshal.

The approximate 5-acre project site is situated within Northeast Los Angeles, which is bordered to the north by the cities of Glendale and Pasadena, to the south by downtown Los Angeles, to the west by the Los Angeles River, and to the east by several cities of the San Gabriel Valley. Specifically, the project site is located in the neighborhood of Glassell Park, east and north of Division Street at the southern termini of Haverhill Drive, Sundown Drive, and Brilliant Drive. The site is depicted in Sections 2 and 3, Township 1 South, Range 13 West of the U.S. Geological Survey (USGS) *Los Angeles, California* 7.5-minute topographic quadrangle.

The proposed project site encompasses 32 vacant parcels proposed for single-family residential development. Adjacent land uses include residential development on all sides. The site is currently undeveloped.

Brush Clearance Requirements

According to Chapter 49 of the California Fire Code, which regulates hazardous vegetation and fuel management:

Hazardous vegetation and fuels around all applicable buildings and structures shall be maintained in accordance with the following laws and regulations:

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1. *Public Resources Code, Section 4291.*
"Maintain defensible space of 100 feet from each side and from the front and rear of the structure... The amount of fuel modification necessary shall take into account the flammability of the structure as affected by building material, building standards, location, and type of vegetation. Fuels shall be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure."
 2. *California Code of Regulations, Title 14, Division 1.5, Chapter 7, Subchapter 3, Section 1299 (see guidance for implementation "General Guideline to Create Defensible Space").*
"(A) Dead and dying woody surface fuels and aerial fuels shall be removed. Loose surface litter, normally consisting of fallen leaves or needles, twigs, bark, cones, and small branches, shall be permitted to a maximum depth of three inches (3 in.).
(B) Cut annual grasses and forbs down to a maximum height of four inches (4 in.).
(C) All exposed wood piles must have a minimum of ten feet (10 ft.) of clearance, down to bare mineral soil, in all directions."
 3. *California Code of Regulations, Title 19, Division 1, Chapter 1, Subchapter 1, Section 3.07.*
"(1) Maintain around and adjacent to such building or structure a firebreak made by removing and clearing away, for a distance of not less than 30 feet on each side thereof or to the property line, whichever is nearer, all flammable vegetation or other combustible growth. This section does not apply to single specimens of trees, ornamental shrubbery, or similar plants which are used as ground cover, if they do not form a means of rapidly transmitting fire from the native growth to any building or structure.
(2) Maintain around and adjacent to any such building or structure additional fire protection or firebreak made by removing all bush, flammable vegetation, or combustible growth which is located from 30 feet to 100 feet from such building or structure or to the property line, whichever is nearer, as may be required by the enforcing agency if he finds that, because of extra hazardous conditions, a firebreak of only 30 feet around such building or structure is not sufficient to provide reasonable fire safety. Grass and other vegetation located more than 30 feet from such building or structure and less than 18 inches in height above the ground may be maintained where necessary to stabilize the soil and prevent erosion."

These codes require fuel management and maintenance of defensible space, particularly in Very High Fire Hazard Severity Zones, such as the location of the project site, as well as adjacent to existing structures. The codes do not provide exceptions to fuel modification requirements for the purposes of maintaining habitat around protected trees. Regardless of the presence of protected southern California black walnut (*Juglans californica* var. *californica*) woodland, the project site is subject to these ordinances. These requirements for fuel management include trees, as well as shrubs and grasses.

Rincon Senior Biologist Robin Murray contacted the LAFD Brush Clearance department to determine whether the local jurisdiction governing the project site provides brush clearance exceptions for areas containing protected trees. Fire Department staff confirmed that no exceptions are provided.

Site Fuel Management History

Review of historical satellite photos of the site within Google Earth suggests that the site has been subject to regular brush clearance since at least 2001. Brush clearance is required to be conducted on an annual basis. The property owner appears to have complied with this requirement for fuel reduction on an ongoing basis for at least 15 years. Rincon biologist Nathan Marcy conducted a nesting bird survey on the project site and observed annual brush clearance activities on April 22, 2016. Due to the regular intensive annual brush clearance regime, the habitat has been significantly altered, resulting in very little shrub layer or tree understory development. While existing mature trees are generally in good health (83% rated A to B- by an arborist [Carlberg 2016]). California black walnut seedlings are not

allowed to establish due to annual brush clearance. The brush clearance regime does not appear to be detrimental to the health of existing trees, but it precludes the establishment of young trees that would eventually replenish aging trees on the site.