



# City of Susanville

(530) 257-1000 • 66 North Lassen Street • Susanville, CA 96130-3904

April 4, 2016

Board of Forestry and Fire Protection  
PO Box 944246  
Sacramento, CA 94244-2460  
Attn: Edith Hannigan, Board Consultant, SRA

Dear Ms. Hannigan,

The City of Susanville has received the Board of Forestry's review of the City's Draft Safety Element pursuant Government Code Section 65302.5 and the recommendations contained therein. In response to the recommendations the City has the following comments:

**4.1 Recommendation:** Establish goals and policies for incorporating systematic fire protection improvements for open space. Specifics policies should address facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with agencies/private landowners managing open space adjacent to the General Plan area, water sources for fire suppression, and other fire prevention and suppression needs.

**Response:** With the exception of open space lands within a VHFHSZ, open space lands in Susanville typically have low fuel loads and are adjacent to public roads on one or more sides. The City is currently in the process of updating its Open Space and Conservation Element and will review the need for additional water sources and access to Open Space lands at that time.

**4.2 Recommendation:** Identify critical natural resources and other "open space" values within the geographic scope of the General Plan.

**Recommendation:** Evaluate and resolve existing laws and local ordinances which conflict with fire protection requirements. Examples include conflicts with vegetation hazard reduction ordinances and listed species habitat protection requirements.

**Response:** The City will review these recommendations during the update to the Open Space and Conservation Element.

**Brian R. Wilson**  
Mayor  
**Nicholas B. McBride**  
Mayor pro tem

**Councilmembers:**  
**Lino P. Callegari**  
**Rod E. DeBoer**  
**Kathie F. Garnier**

**4.3 Recommendation:** Develop plans and action items for vegetation management that provides fire damage mitigation and protection of open space values. Plans should address protection of natural resource financial values, establishment of fire resilient natural resources, protection of watershed qualities, and protection of endangered species habitats. Actions should consider prescribed burning, fuel breaks, and vegetation thinning and removal

**Recommendation:** Establish goals and policies for reducing the wildland fire hazards within the entity's boundaries and, with the appropriate partners, on adjacent private wildlands, federal lands, vacant residential lots, and greenbelts with fire hazards that threaten the entity's jurisdiction.

**Response:** The City has limited open space areas which in the City's opinion do not require active vegetation management plans and policies or fire damage mitigations. There are no known endangered species within the City with the exception of a few plant populations which are not fully listed. The City is primarily surrounded by land that is in private ownership and much of it is undeveloped. The local fire safe council has been the primary avenue for fuel reduction on private lands near Susanville. The program the fire safe council uses does not appear to make partnership a feasible option. The City will continue to explore options for reducing wildland fire hazards on property outside its jurisdiction.

**5.1 Recommendation:** Establish goals and policies for adequate access in Very High Fire Hazard Severity Zones that meet or exceed standards in Title 14 CCR 1270 for lands with no structures, and maintain conditions of access in a suitable fashion for suppression access or public evacuation.

**Response:** The provisions of Title 14 CCR 1270 apply to lands in the SRA and are not applicable to LRA. The City will take this recommendation under advisement.

**5.3 Recommendation:** Develop an adaptive vegetation management plan that considers fuels, topography, weather (prevailing winds and wind event specific to the area), fire ignitions and fire history.

**Response:** Roads within the City typically have yards and landscaping adjacent to them not wildland vegetation. A vegetation management plan would not be appropriate for the urban area. Parcels within the VHFHSZ are small and the required fuel reduction standards will address this issue without the need for a separate vegetation management plan.

**6.1 Recommendation:** Incorporate goals and policies that provide for reassessment of fire hazards following wildfire events. Adjust fire prevention and suppression needs commensurate for both short and long term fire protection needs.

**Response:** In the event of a wildfire event a post fire assessment is standard and in the opinion of the City will suffice for the purpose of the recommendation. The City does not believe a goal or policy will make a meaningful change to the process.

**6.2 Recommendation:** In High and Very High Hazard areas, ensure redevelopment utilizes state of the art fire resistant building and development standards to improve past 'substandard' fire safe conditions.

**Response:** In the event that structures are burned in a VHFHSZ, reconstructed structures, by City code, will have to comply with fire resistant construction techniques. No additional action is required. Title 24 CBC Chapter 7A

**8.6 Recommendation:** Provide polices and goals for maintenance of the post-fire-recovery projects, activities, or infrastructure.

**Response:** Until a fire occurs it is not known what post fire recovery projects may be appropriate and what maintenance may be necessary. A blanket policy or goal simply stating that post-fire recovery projects should be maintained carries very little meaning. The City believes it is appropriate to formulate the necessary maintenance based on individual cases rather than broad policies or goals.

**8.7 Recommendation:** Identity flood and landslide vulnerability areas related to post wildfire conditions.

**Recommendation:** Establish goals and policies that address the intersection of flood /landslide/post fire burn areas into long term public safety protection plans. These should include treatment assessment of fire related flood risk to life, methods to control storm runoff in burn areas, revegetation of burn areas, and drainage crossing maintenance.

**Response:** The identification of post wildfire conditions that are subject to potential flood and landslide vulnerabilities is highly dependent on the location and topography of the land affected by the fire. The City feels that it would be most productive and meaningful to address this issue by

conducting individual, on-site assessments and mitigation rather than blanket policies. No additional changes to the document are proposed.

Sincerely,

A handwritten signature in blue ink that reads "Craig Sanders". The signature is written in a cursive style with a long, sweeping underline.

Craig Sanders  
City Planner