

FINAL  
ENVIRONMENTAL IMPACT STATEMENT  
for a  
Fire Management Plan



Santa Monica Mountains  
National Recreation Area

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September 2005



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California

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# SUMMARY

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The purpose of this environmental impact statement is to consider the impacts of implementing various fire management alternatives in the Santa Monica Mountains National Recreation Area (SMMNRA). In addition to providing information required by law and the 2001 Federal Fire Policy, this environmental impact statement will respond to the primary issues of concern raised during a series of internal and public scoping sessions.

This assessment analyzes four of seven alternatives developed through an interdisciplinary planning team. Following an initial evaluation, it became clear that three alternatives could not be reasonably implemented in a way that would meet program objectives given other constraints and laws. Consequently these three alternatives were considered but rejected and the bulk of this environmental impact statement focuses on the remaining four alternatives.

The park's previous *Fire Management Plan* (NPS, 1994) was based on a strategy of landscape level prescribed burning to create a landscape mosaic of different age classes in shrubland communities with the objective of reducing fire hazard and maintaining ecological health. This is alternative 1, the no action alternative, against which the other three alternatives are evaluated. The remaining three alternatives are a hierarchical combination of the fire management actions that will meet the goals of the *Fire Management Plan*. The range of fire management actions include mechanical fuel reduction, ecological prescribed fire, and strategic fuels treatment. Alternative 4 includes mechanical fuel reduction only, Alternative 3 includes mechanical fuel reduction and ecological prescribed fire, and Alternative 2 includes mechanical fuel reduction, ecological prescribed fire, and strategic fuels treatment. In addition, wildland fire suppression and public education and support are actions common to all four alternatives.

Alternative 2 is the environmentally preferred alternative, and has been selected for implementation. It provides the maximum potential environmental benefits and minimizes the adverse impacts of fire management actions. Alternative 2 is the most flexible alternative, utilizing all available fire management strategies identified to be appropriate in the Santa Monica Mountains. Alternative 1 is inappropriate to the fire climate of the Santa Monica Mountains, is infeasible to implement, and is the most environmentally damaging alternative. Alternative 4 effectively addresses structure protection at the wildland urban interface, but does not provide any of the ecological benefits from ecological prescribed burning included in Alternatives 2 and 3. Alternative 2 is considered superior to Alternative 3 because it would not eliminate the potential benefits from strategic fuels reduction. Although strategic fuels reduction has the potential for both impacts and benefits in most of the impact areas analyzed, individual strategic fuels reduction projects would be evaluated for their potential risk:benefit ratio according to the analytical procedure outlined in the discussion of fire hazard assessment (Figure 3-23).

Under the National Park Service (NPS) Organic Act and the General Authorities Act, as amended,

the NPS may not allow the impairment of park resources and values except as authorized specifically by Congress (*NPS Director's Order 55* or DO-55). Impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. Park managers have examined each potential impact of the preferred alternative and determined that the combination of actions provided for in this environmental assessment will not result in the impairment of any park resources and values.

*Cover photo by Chuck Lovers. Courtesy of Los Angeles County Fire Department*

# Environmental Impact Statement

## TABLE OF CONTENTS

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### Chapter One INTRODUCTION

I	Purpose .....	1-1
II	Need For Action .....	1-2
III	The Decision to Prepare an Environmental Impact Statement .....	1-3
IV	Goals and Objectives of the SMMNRA Fire Management Plan .....	1-4
V	Significance of the Santa Monica Mountains National Recreation Area .....	1-9
VI	Relationship With Federal Fire Policy.....	1-9
VII	Relationship of the SMMNRA Fire Management Plan to Resource Management .....	1-13
VIII	Interdisciplinary Planning Team .....	1-14
IX	Decisions to be Made .....	1-15
X	Public Scoping and Issues Considered .....	1-15

### Chapter Two ALTERNATIVES

I	Development of Alternatives.....	2-1
II	Description of Alternatives .....	2-1
III	Quantification of the Amount of Managed Acreage by Alternative .....	2-8
IV	Alternatives Considered But Rejected .....	2-18
V	Environmentally Preferred Alternative .....	2-18
VI	Mitigation Matrix .....	2-19

### Chapter Three AFFECTED ENVIRONMENT

I	Overview .....	3-1
II	Climate and Geological Setting .....	3-4
III	Fire Environment .....	3-12
IV	Natural Resources .....	3-40
A1	Biological Resources – Vegetation and Fire Effects .....	3-40
A2	Biological Resources – Wildlife and Fire Effects .....	3-59
A3	Biological Resources – Habitat Connectivity and Fire Effects on Wildlife .....	3-71
A4	Biological Resources – Non-native/Invasive Species and Fire Effects .....	3-73
A5	Biological Resources – Rare, Threatened and Endangered Species .....	3-75
A5a	Biological Resources – Rare, Threatened and Endangered Species: Sensitive Species – Plants .....	3-76
A5b	Biological Resources – Rare, Threatened and Endangered Species: Sensitive Species – Wildlife.....	3-80
B	Geology and Soils .....	3-94
C	Water Resources/Wetlands .....	3-107
D	Coastal Resources .....	3-110
E	Paleontological Resources .....	3-111
F	Air Quality .....	3-112

V	Cultural/Historic Resources .....	3-116
VI	Social Environment .....	3-136
A	Land Use .....	3-136
B	Recreation .....	3-138

## Chapter Four IMPACTS OF ALTERNATIVES

I	Methodology and Thresholds of Significance .....	4-1
II	Regulations and Policies.....	4-2
III	Impact Topics Considered and Dismissed .....	4-4
IV	Impact Topics .....	4-4
A1a	Biological Resources –Vegetation .....	4-4
A1b	Biological Resources –Wildlife .....	4-10
A1c	Biological Resources –Habitat Connectivity .....	4-15
A1d	Biological Resources – Non-Native/Invasive Species .....	4-19
A1e	Biological Resources – Rare,Threatened and Endangered Species – Plants ...	4-24
A1f	Biological Resources – Rare,Threatened and Endangered Species – Animals ...	4-28
A2	Soils and Geology .....	4-34
A3	Water Resources and Wetlands .....	4-39
A4	Coastal Resources .....	4-43
A5	Paleontological Resources .....	4-44
A6	Air Quality .....	4-47
B	Cultural/Historic Resources .....	4-55
C1	Land Use .....	4-68
C2	Land Use – Recreation .....	4-72
C3	Land Use – Scenic Resources .....	4-75
C4	Land Use – Health and Safety.....	4-77
C5	Land Use – Risk of Catastrophic Events .....	4-80
D	Cumulative Impacts .....	4-83
E	Impairment .....	4-86
V	Conclusions .....	4-89

## Chapter 5 SUMMARY OF ENVIRONMENTAL CONSEQUENCES

	Summary of Environmental Consequences .....	5-1
--	---	-----

## Chapter 6 CONSULTATION AND COORDINATION

I	Interagency and Public Scoping .....	6-1
II	Cultural Resources and Native American Consultation .....	6-2
III	Interdisciplinary Planning Team Members .....	6-2

## Chapter 7 REFERENCES

	Reference List .....	7-1
--	----------------------	-----

## APPENDICES

	Appendix A Fuel Modification Policy Example – State of California Department of Parks and Recreation .....	A-1
--	---	-----

Appendix B	Direct, Operational and Indirect Fire Effects on Cultural Resources at Santa Monica Mountains National Recreation Area	B-1
Appendix C	Guidelines for Fire Suppression Activities in Sensitive Resource Areas	C-1
Appendix D	Invasive Species and Weed Management Planning in the Santa Monica Mountains National Recreation Area.	D-1
Appendix E	List of Agencies and Recipients Contacted	E-1
Appendix F	Input and Response to Draft SMMNRA Fire Management Plan/EIS	F-1
Appendix G	Concurrence From Regulatory Agencies	G-1

## List of Tables and Figures

---

### Chapter One

Table 1-1	Objectives and Implementation Strategies to Meet the Goals of SMMNRA Fire Management Plan	1-5
Table 1-2	National Park Service Fire Management Program Requirements	1-10
Table 1-3	2001 Federal Wildland Fire Management Policy	1-11

### Chapter Two

Table 2-1	Summary of Alternatives	2-6
Table 2-2	Range of Projected Annual Acreage on NPS Lands Managed by Alternative Over the First Five Years.	2-9
Figure 2-1	Map of WUI Mechanical Fuel Modification Zones	2-10
Figure 2-2	Map of Potential Prescribed Burn Restoration Sites	2-11
Figure 2-3	Map of NPS Park Units	2-12
Table 2-3	Fuel Modification and Prescribed Burn Areas on NPS Lands by Park Unit	2-13
Table 2-4	Summary Scope of Individual Projects and Annual Program on NPS Lands	2-17
Table 2-5	Rejected Alternatives	2-18
Table 2-6	Mitigation Measures to Reduce Wildland Fire and Fire Management Impacts	2-19

### Chapter Three

Figure 3-1	Santa Monica Mountains and Vicinity	3-1
Table 3-1	Current Park Ownership	3-3
Figure 3-2	Profile of the Sepulveda Pass	3-5
Figure 3-3	Watersheds of the Santa Monica Mountains and Simi Hills	3-6
Figure 3-4	Annual Rainfall Patterns in the Santa Monica Mountains	3-7
Figure 3-5	Temperature Variation in the Santa Monica Mountains	3-8
Table 3-2	Annual Temperature and Rainfall Patterns for the Santa Monica Mountains	3-9
Table 3-3	Santa Ana Wind Frequency and Duration by Month for the Angeles National Forest 1951-1960	3-9

Figure 3-6	Live Fuel Moisture Levels 1981-2002 Graph A .....	3-10
Figure 3-6	Live Fuel Moisture Levels 1981-2002 Graph B .....	3-11
Figure 3-7	Fire Frequency and Total Area Burned Per Month 1925-2000 .....	3-13
Table 3-4a	Causes of Fire in the Santa Monica Mountains National Recreation Area 1981-2003 Ordered by Total Area Burned (acres).....	3-14
Table 3-4b	Causes of Fire in the Santa Monica Mountains National Recreation Area 1981-2003 Ordered by Fire Frequency .....	3-15
Table 3-5	Summary Fire Statistics of the Santa Monica Mountains 1925-2001 .....	3-16
Table 3-6	The 12 Largest Fires in the Santa Monica Mountains 1925-2000 .....	3-17
Figure 3-8	Cumulative Total Area Burned 1925-2000 .....	3-17
Figure 3-9	Size and Year of All Fires Recorded in the Santa Monica Mountains, 1925-2000 .....	3-18
Figure 3-10	Fire Frequency by Five Year Periods .....	3-21
Figure 3-11	Frequency of Large and Small Fires .....	3-21
Figure 3-12	Total Area Burned by Decade .....	3-22
Figure 3-13	Fire History: Number of Fires .....	3-23
Figure 3-14	Cumulative Total Area Burned by Age Class .....	3-24
Figure 3-15	Fire History: Time Since Fires .....	3-25
Figure 3-16	Age Classes of Vegetation Burned in the Eight Largest Fires .....	3-26
Table 3-7	Threshold Values Beyond Which Burn Area is Independent of Environmental Variables .....	3-26
Figure 3-17	Los Angeles County Wildland Urban Interface Hazard Map: Communities at Risk .....	3-29
Figure 3-18	GIS-based Model for Characterizing Opportunities for Strategic Fuel Modification Projects in the Santa Monica Mountains.....	3-32
Figure 3-19	Regional Ownership Map with Potentially Appropriate Strategic Fuel Modification Areas .....	3-33
Figure 3-20	Detailed Ownership Map With Potentially Appropriate Strategic Fuel Modification Areas – Topanga .....	3-34
Figure 3-21	Potentially Appropriate Strategic Fuel Modification Areas in Proximity to High Density Development .....	3-35
Figure 3-22	Change in Fire Hazard and Ecological Risk Following Fuels Treatment .....	3-36
Figure 3-23	Decision Model for Strategic Fuel Modification Projects.....	3-39
Figure 3-24	Vegetation Map of the Santa Monica Mountains National Recreation Area	3-41
Table 3-8	Sensitive Plant Species of the Santa Monica Mountains .....	3-76
Table 3-9	Sensitive Wildlife Species of the Santa Monica Mountains .....	3-80
Figure 3-25	Stratigraphy of the Santa Monica Mountains (From Raven et, 1986, P 8) ...	3-95
Figure 3-26	Historic Native Settlements in the Santa Monica Mountains .....	3-117
Table 3-10	Expected Archeological Indicators by Vegetation Community and Landform (Adapted from King 2000) .....	3-123
Table 3-11	List of Classified Structures .....	3-124
Table 3-12	Distribution of Known Archeological Sites by Vegetation Type .....	3-134
Figure 3-27	Relationship Between Survey Coverage and Vulnerability of Cultural Resources to Fire Effects, Topography, and Vegetation .....	3-135

Figure 3-28	Susceptibility of Cultural Materials in Surface and Surface/Subsurface Contexts to Direct Fire Effects .....	3-136
<b>Chapter Four</b>		
Table 4-1	Particulate Matter Emissions .....	4-48
Table 4-2	PM 10 Emission Calculation For Burning of Multiple Fuel Types 1, 2 .....	4-49
Table 4-3	Emission Values (EV) For Prescribed Burns of Various Vegetation Types* ...	4-50
Table 4-4	Particulate Emissions (PM10) For Prescribed Burning Alternatives .....	4-52
Figure 4-1	Relationship Between Historic Properties and Resources of Interest .....	4-57
<b>Chapter Five</b>		
Table 5-1	Summary of Environmental Consequences of Alternatives For Each Issue Detailed in Chapter 4 .....	5-1
<b>APPENDICES</b>		
Table B-1	Melting Points of Metal Materials Commonly Found on Historical Archeological Sites .....	B-5
Table D-1	Exotic Pest Plants of Greatest Ecological Concern in the Santa Monica Mountains National Recreation Area .....	D-1
Table F-1	Commentator Summary Table .....	F-1



# Chapter One

# INTRODUCTION

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## I Purpose

The Santa Monica Mountains National Recreation Area (SMMNRA) is unusual within the National Park Service (NPS) because the recreation area is located adjacent to one of the world's largest urban areas. It is distinguished from many other national parks or recreation areas in that it is comprised of a mosaic of federal, state, and private lands. It is the NPS's best mainland example of a Mediterranean ecosystem, an ecosystem that has a limited worldwide geographic distribution and high biological diversity (<http://www.biodiversityhotspots.org/xp/Hotspots>). The SMMNRA is also an area that experiences high intensity wildfires which have periodically carried a heavy social cost from structural property losses and the massive fire fighting efforts required to protect development and lives at the wildland urban interface.

Wildland fire is a natural process in the southern California Mediterranean ecosystem with fire tolerant or fire dependent adaptations characteristic of many species in the ecosystem. Fire history has shaped the plant communities of SMMNRA and is a major factor affecting their diversity, productivity and distribution (Barbour and Major, 1988; Keeley, 2000; Rundel, 1986).

Fire management is the range of human activities that are used to either control or utilize fire. Fire management can be used to suppress, ignite, or modify behavior of fires in order to protect human life or property or modify ecosystem properties. It is well understood that aggressive fire suppression during the 20th century successfully excluded fire from certain forest landscapes, allowing the buildup of forest litter and excessive vegetation, creating conditions for intense, large-scale, wildfires (Agee et al, 1978; van Wagendonk, 1985; Stephens, 1995, 1998). During the same time period there has been a dramatic increase in the number of people living in wildland areas that are prone to wildfires. Consequently the number of people and structures at risk from wildfire has dramatically increased as have the associated costs of fighting fires (CDF, 2000 <http://www.fire.ca.gov/FireEmergencyResponse/HistoricalStatistics/PDF/00hist>; National Fire Plan, 2002 <http://www.fireplan.gov>; California Fire Plan <http://www.fire.ca.gov/FireEmergencyResponse/FirePlan/FirePlan.asp>). In response to the convergence of these two trends, there has been a massive federal funding effort and substantial social and political pressure to reduce plant biomass with landscape level mechanical fuel modification or by reintroducing fire through prescribed burning (National Fire Plan, 2002).

Unfortunately, the forest model of *successful fire suppression > fuel buildup > extreme wildfires* is not true for all fire-adapted ecosystems. In the Mediterranean shrublands of southern California, fire suppression has not been successful in preventing large-scale, intense, wildfires and "fuel buildup" is the normal process of growth and maturation of the dominant chaparral

vegetation. Because fire has not been successfully excluded from southern California shrubland ecosystems, there is no need to introduce additional fire through management actions to restore southern California shrublands. In fact, the number of fires in the SMMNRA has increased throughout this century (Figure 3-8). This is attributed to population growth and expansion of the wildland urban interface zone (Keeley and Fotheringham, 2001; Keeley, 2002). It has been suggested that aggressive fire suppression in southern California is an ecologically positive management action that has been responsible for maintaining a more nearly normal fire regime than would occur in the absence of suppression (Keeley and Fotheringham, 2001).

In the growing wildland urban interface zone of the SMMNRA there is a need to manage wildland fire so that threats to life, property and park resources are reduced and fire's function as a natural process is maintained. Fire management actions in the SMMNRA need to deal primarily with fire hazards created by development at the urban wildland interface and not to correct "unnatural" fuel buildup on the landscape. The financial costs of fire management actions must be assessed and be commensurate with protection of the values at risk.

## II Need For Action

Fire management actions are guided by fire management plans. Fire management plans are fundamental strategic documents that guide the full range of fire management activities. They are required by the *NPS Director's Order 18* (NPS,1998) which states:

*"Every park area with burnable vegetation must have a fire management plan approved by the superintendent,"*

and the 2001 Federal Wildland Fire Management Policy (hereafter, 2001 Federal Fire Policy), which reiterates:

*"Complete, or update, Fire Management Plans for all areas with burnable vegetation."*

In 2001 the 1995 Federal Wildland Fire Management Policy was reviewed for all federal wildland fire agencies and subsequently will be referred to as the Guiding Principles and 2001 Federal Fire Policy. The review and recommendations took place in the context of the September 8, 2000 report to the President by the Secretaries of the Interior and Agriculture, *Managing the Impact of Wildfires on Communities and the Environment: a Report to the President in Response to the Wildfires of 2000* and the *Fiscal Year 2001 Interior and Related Agencies Appropriation Act*.

The review found the 1995 policy generally sound, although the 2001 version contains some changes and updates. In addition to emphasis placed on ecosystem sustainability, restoration, science, education and communication, and program evaluation, programs will also need to consider operational and implementation aspects as a result of issues raised in the *Cerro Grande Prescribed Fire Investigation Report* and the subsequent independent review report. The revised fire management policy for the NPS has been expressed in *NPS Director's Order 18* and

Reference Manual 18. The revision of the fire management plan will reflect these changes in policy.

This plan will document how the park plans to accomplish land and resource objectives and to reduce the risk of fire to development adjacent to the park. This *Draft SMMNRA Fire Management Plan* and associated environmental impact statement presents four alternatives for the fire management program of the SMMNRA. The alternatives are based on park values, effective fire management strategies, NPS policy and applicable law. This document also addresses primary issues of concern raised during a series of internal and public scoping sessions.

### III The Decision to Prepare an Environmental Impact Statement

The decision to prepare an Environmental Impact Statement (EIS) on the *Draft SMMNRA Fire Management Plan* was made by the Superintendent of SMMNRA after considering the scope, complexity, and public interest related to issues being addressed in the plan. Fire ecology and management are certainly among the most pervasive and complex influences on ecosystem processes and the human environment of the Santa Monica Mountains. The role of fire has implications for park use, ecosystem structure and function, and human activities throughout the region. This complexity and associated public interest suggested a level of analysis commensurate with an EIS. By completing an EIS for the *Draft SMMNRA Fire Management Plan*, sufficient analysis can be undertaken to assess the effects of particular alternatives and to ensure adequate involvement by the public and interested agencies.

Following the public comment period on the *Draft SMMNRA Fire Management Plan/EIS* and any necessary consultations for actions that may affect natural or cultural resources, a *Final SMMNRA Fire Management Plan/EIS* will be prepared and distributed to the public. At the conclusion of a 30-day waiting period, the NPS will prepare a Record of Decision. A summary document of the *SMMNRA Fire Management Plan*, will also be prepared and distributed. Following the Record of Decision, the recommendations of the new plan can begin to be implemented and the plan will become the working document guiding fire management programs across the SMMNRA.

This *Draft SMMNRA Fire Management Plan/EIS* was prepared to comply with the requirements of the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) as well as the Endangered Species Act and the Wild and Scenic Rivers Act. The legal authority for preparing and implementing the *SMMNRA Fire Management Plan* is codified in 16 USC 1 through 4, which is the 1916 Organic Act for the NPS.

This document will screen each proposed alternative for compliance with these policies, plans, and laws.

## IV Goals and Objectives of the SMMNRA Fire Management Plan

The *SMMNRA Fire Management Plan* will provide a detailed program of actions to carry out fire management policies and objectives on NPS lands in the SMMNRA. The goals and objectives of the plan have their foundation in the park's planning documents: the *General Management Plan* (2003), the *Resource Management Plan* (1999), as well as NPS and federal legislation and fire policy; the NPS Organic Act; and the enabling legislation establishing the SMMNRA.

The *SMMNRA Fire Management Plan* goals are the broad principles which guide development of the plan's specific management objectives and associated implementation actions. The goals are outlined below and the management objectives and implementation measures are listed in Table 1-1.

### Goal 1

**Provide for firefighter and public safety first in all fire management activities.**

### Goal 2

**Reduce fire hazards in SMMNRA with the most effective fire management strategies consistent with NPS laws and policies.**

Fire hazard is defined as ecological or social values that may be placed at risk from extreme fire behavior. Effective fire management strategies are those which maximize safety, protect life and property, and are cost effective for the values at risk. Social values include: park employees, visitors, neighboring communities, recreational opportunity, wilderness, prehistoric and historic cultural sites, historic structures, and contemporary structures, both government-owned and private.

### Goal 3

**Protect the park's ecological and cultural resources.**

Ecological values include vegetation, wildlife, soil, water, natural processes, and air resources. Cultural values include prehistoric and historic cultural sites and historic structures.

### Goal 4

**Identify resource conditions and a hazard assessment of private property within and around the park boundary that require specific fire management actions.**

### Goal 5

**Provide a decision framework for fire and resource managers to evaluate fire management proposals that provide protection of social values from wildfires or proposals that provide enhancement of resource values.**

Social values include: park employees, visitors, neighboring communities, recreational opportunity, wilderness, prehistoric and historic cultural sites, historic structures, and contemporary structures, both government-owned and private. Resources include native vegetation, water, wildlife, natural processes, and air resources.

Table I-1 Objectives and Implementation Strategies to Meet the Goals of SMMNRA Fire Management Plan

<b>I</b>	<b>Objective</b>
<p><b>During all fire management activities, firefighter and public safety are first priority.</b></p> <p><b>Strategies</b></p> <ul style="list-style-type: none"> <li>• All fire personnel will comply with the National Wildfire Coordinating Group (NWCG) and agency fitness requirements and will have personal protective equipment appropriate to the job or assignment.</li> <li>• Qualifications and staff experience necessary to accomplish fire management program objectives in a safe manner will be established and promoted.</li> <li>• All safety standards and guidelines identified within the Interagency Incident Business Management Handbook will be followed.</li> <li>• The Job Hazard Analysis (JHA) process will be used for all potentially hazardous fire management activities.</li> </ul>	
<b>II</b>	<b>Objective</b>
<p><b>All SMMNRA fire management activities will be performed in accordance with the principles, policies, and recommendations of the following documents: Final Report of the Federal Wildland Fire Management Policy and Program Reviews, Departmental Manual, Parts 350-354 and 620 DO60, Aviation Management (in review).</b></p> <p><b>Strategies</b></p> <p>The following key themes from the Final Report of the Federal Wildland Fire Management Policy and Program Reviews will be implemented by the park fire management officer into all fire management activities:</p> <ul style="list-style-type: none"> <li>• <b>Ecosystem sustainability</b> to recognize the role of fire in sustaining healthy ecosystems, restoration, rehabilitation of burnt lands, and the importance of sound science in fire management activities.</li> <li>• <b>Fire planning</b> with timely reviews of the park's fire management plan and related planning documents.</li> <li>• <b>Fire operations</b> with emphasis on safety, protection priorities, appropriate preparedness, appropriate suppression actions, use of wildland fire (prescribed fire), prevention activities, and roles and responsibilities in the wildland urban interface.             <ul style="list-style-type: none"> <li>— <b>Interagency coordination and cooperation</b> to include federal land management agency and agencies with supporting or related programs as full partners in wildland fire management activities and programs.</li> <li>— <b>Communication and education programs</b> to enhance understanding of the fire management mission for both internal and external audiences.</li> </ul> </li> </ul>	

- All aviation policies and practices will be followed during SMMNRA fire management activities, should air operations become necessary, as described in the Department of Interior Departmental Manual, Part 350-354 and 620 DO60, Aviation Management. The park fire management officer or designee will stay abreast of aviation policy changes by maintaining periodic contact with the regional aviation manager.

### **III Objective**

**Identify areas for fire suppression, mechanical hazard fuel reduction, and strategic use of prescribed fire to achieve maximum benefit with the least impact.**

#### **Strategies**

- Adopt an operational role in the wildland urban interface that includes wildland fire-fighting, hazard fuel reduction, cooperative prevention and education, and technical assistance..
- Identify and fund, on a cost-share basis, high-priority fuels management activities on federal land adjacent to wildland urban interface areas identified through a fire protection assessment process that considers relative values to be protected. These activities may involve adjacent non-federal lands.
- Use vegetation maps, fire history maps, and other tools to develop risk assessments which will identify and prioritize appropriate treatments.

### **IV Objective**

**Educate employees and the public about the scope and effect of wildland fire management, including fuels management, resource protection, prevention, hazard/risk assessment, mitigation and rehabilitation, and the role of fire in ecosystem management.**

#### **Strategies**

- Support the development of evacuation plans for wildland urban interface communities within the mountains.
- Provide trailhead brochures on fire safety.
- Increase fire ecology and safety programs in schools.
- Encourage Fire Safe Councils and FIREWISE Communities.
- Increase public meetings and homeowners groups presentations.
- Place emphasis on fuels reduction on the private property owner.
- Explore grants for fire-safe construction.
- Establish and maintain an Internet site with fire safety information.
- Provide more interpretive programs on fire safety and ecology.
- Develop prevention plans to reduce number of human-caused ignitions.

**V Objective**

**Stabilize and prevent degradation of natural and cultural resources lost in and/or damaged by impacts of wildland fires, fire suppression and/or fire management.**

**Strategies**

- Employ minimum impact tactics, including adjusting tactics to, where feasible, avoid sensitive natural resources and cultural resources. Use brush blade for line building when a bulldozer line is determined as a necessary tactic, use helicopter long lines instead of constructing helispots, cold trail and use natural barriers instead of line construction. Other implementation guidelines can be found in Appendix C.
- Post-fire rehabilitation would be initiated through the Burned Area Emergency Rehabilitation (BAER) funding request process to mitigate a broad range of threats to natural and cultural resources critical to Santa Monica Mountains National Recreation Area mission and resource protection mandates. See RM18, Chapter 12 for guidelines to implement BAER.

**VI Objective**

**Maintain the highest standards of professional and technical expertise in planning and safely implementing an effective wildland fire management program.**

**Strategies**

- Implement annual program reviews.
- Implement training plans for each employee to reach target qualifications for the positions in the fire management organization.
- Conduct annual training appropriate to instructor qualifications.
- Attend conferences to keep abreast of the latest developments and technology applicable to fire management.

**VII Objective**

**Integrate fire management with all other aspects of park management.**

**Strategies**

- Develop a fire management program that is consistent with, and meets the goals of, the park's General Management Plan and Resource Management Plan.

**VIII Objective**

**Manage wildland fire incidents in accordance with accepted interagency standards using appropriate management strategies and tactics and maximize efficiencies realized through interagency coordination and cooperation.**

**Strategies**

- Establish and maintain co-operative fire management agreements with county and city fire departments.
- Recognize appropriate and acceptable interagency management strategies and tactics for incidents by using Minimum Impact Suppression Tactics where possible. See

RM18, Chapter 9, Exhibit 5.

- Attend interagency planning meetings prior to each fire season to enhance coordination and cooperation to maximize efficiency to manage wildland fire incidents.

## **IX Objective**

**Develop a scientific fire management program using the best available knowledge and technology to guide fire management actions to restore and preserve SMMNRA ecosystems and maintain long-term ecological integrity.**

### **Strategies**

- Use information gained through inventory, monitoring and review of research by others to evaluate and improve the fire management program; translate scientific knowledge into policy and management practices, including but not limited to:
  - Research the role of fire in the southern California Mediterranean ecosystem.
  - Identify how fire can be used to target exotic plant species for eradication.
  - Research the effects of fire exclusion.
  - Research how exotic plants affect native seed banks.
  - Determine how current fire frequency affects the ecosystem with respect to the historic fire regime.
  - Identify how post-fire recovery patterns may be used in restoration projects.

## V Significance of the Santa Monica Mountains National Recreation Area

The SMMNRA is a unit of the NPS and is administered by the NPS. The recreation area was established by Congress in November 1978 to protect the largest expanse of mainland Mediterranean ecosystem in the national park system. Section 507(a) of the enabling legislation (P.L. 95-625) states:

*“The Congress finds that –*

- 1) there are significant scenic, recreational, educational, scientific, natural, archeological, and public health benefits provided by the Santa Monica Mountains and the adjacent coastline;*
- 2) there is a national interest in protecting and preserving these benefits for the residents of and visitors to the area; and*
- 3) The State of California and its local units of government have authority to prevent or minimize adverse uses of the Santa Monica Mountains and adjacent coastline area and can, to a great extent, protect the health, safety and general welfare by the use of such authority.”*

In accordance with the enabling legislation, the SMMNRA must be managed in a manner to preserve and enhance its scenic, natural, and historical setting and its public health value as an airshed for the Southern California metropolitan area while providing for the recreational and educational needs of the visiting public.

In addition to the NPS, there are many different public and private landowners managing land within the Santa Monica Mountains including the California State Parks, the Santa Monica Mountains Conservancy, local governments, land trusts, and individual property owners. Land management in the recreation area is a collaborative effort among the multiple land owners to protect natural, cultural, recreational, social, and scenic values.

## VI Relationship With Federal Fire Policy

Wildland fire management activities conducted by the NPS are guided by NPS management policies, *Director’s Order 18* (1998), and the 2001 Federal Fire Policy. *Director’s Order 18* guides the development of NPS policy relative to fire management and dictates the program requirements for fire management plans. These requirements are listed in Table 1.2. The Federal Wildland Management Policy was revised in 2001. The main elements of this policy are listed in Table 1-3. The *Draft SMMNRA Fire Management Plan/EIS* is in compliance with these policies.

Table I-2 National Park Service Fire Management Program Requirements

National Park Service Policy Directing Development of Fire Management Plans— Director's Order 18: Wildland Fire Management	
<b>Section 5</b>	<b>Program Requirements</b>
<b>Every park area with burnable vegetation must have a fire management plan approved by the superintendent.</b>	
All approved fire management plans will:	
<ul style="list-style-type: none"><li>• Reinforce the commitment that firefighter and public safety is the first priority.</li><li>• Describe wildland fire management objectives, which are derived from land, natural and cultural resource management plans and address public health issues and values to be protected.</li><li>• Address all potential wildland fire occurrences and consider the full range of wildland fire management actions.</li><li>• Promote an interagency approach to managing fires on an ecosystem basis across agency boundaries and in conformance with the natural ecological processes and conditions characteristic of the ecosystem.</li><li>• Include a description of rehabilitation techniques and standards that comply with resource management plan objectives and mitigate immediate safety threats.</li><li>• Be developed with internal and external interdisciplinary input and reviewed by appropriate subject matter experts and all pertinent interested parties and approved by the park superintendent.</li><li>• Comply with the National Environmental Policy Act (NEPA) and any other applicable regulatory requirements.</li><li>• Include a wildland fire prevention analysis and plan.</li><li>• Include fuels management analysis and plan.</li><li>• Include procedures for short and long term monitoring to document that overall programmatic objectives are being met and undesired effects are not occurring.</li></ul>	
Until a Fire Management Plan is approved, park areas must take an aggressive suppression action on all wildland fires, taking into account firefighter and public safety and resources to be protected within and outside the park.	
Although resource impacts of suppression alternatives must always be considered in selecting a fire management strategy, resource benefits cannot be primary consideration unless there is an approved Fire Management Plan.	

Table I-3 2001 Federal Wildland Fire Management Policy

<b>POLICY</b>		<b>2001 FEDERAL WILDLAND FIRE MANAGEMENT POLICY</b>	
<b>Safety</b>		Firefighter and public safety is the first priority. All Fire Management Plans and activities must reflect this commitment.	
<b>Ecosystem Sustainability</b>		The full range of fire management activities will be used to help achieve ecosystem sustainability including its interrelated ecological, economic and social components.	
<b>Response to Wildland Fire</b>		Fire, as a critical natural process, will be integrated into land and resource management plans and activities on a landscape scale, and across agency boundaries. Response to wildland fire is based on ecological, social, and legal consequences of the fire. The circumstances under which a fire occurs, and the likely consequences on firefighter and public safety and welfare, natural and cultural resources, and values to be protected, dictate the appropriate management response to the fire.	
<b>Use of Wildland Fire</b>		Wildland fire will be used to protect, maintain, and enhance resources and, as nearly as possible, be allowed to function in its natural ecological role. Use of fire will be based on approved Fire Management Plans and will follow specific prescriptions described in operational plans.	
<b>Rehabilitation &amp; Restoration</b>		Rehabilitation and restoration efforts will be undertaken to protect and sustain ecosystems, public health, and safety, and to help communities protect infrastructure.	
<b>Protection Priorities</b>		The protection of human life is the single, overriding priority. Setting priorities among protecting human communities and community infrastructure, other property and improvements, and natural and cultural resources will be based on the values to be protected, human health and safety, and the costs of protection. Once people have committed to an incident, these human resources become the highest value to be protected.	
<b>Wildland Urban Interface</b>		The operational roles of federal agencies as partners in the Wildland Urban Interface are wildland firefighting, hazardous fuel reduction, cooperative prevention and education, and technical assistance. Federal agencies may assist with exterior structural protection activities under formal Fire Protection Agreements that specify mutual responsibilities of the partners, including funding. (Some federal agencies have full structural protection authority for their facilities on lands they administer; they may also enter into formal agreements to assist state and local governments with full structural protection.)	
<b>Planning</b>		Every area with burnable vegetation must have an approved Fire Management Plan. Fire Management Plans are strategic plans that define a program to manage wildland and prescribed fires based on the area's approved land management plan. Fire Management Plans must provide for firefighter and public safety; include fire management strategies, tactics, and alternatives; address values to be protected and public health issues; and be consistent with resource management objectives, activities of the area, and environmental laws and regulations.	

<b>POLICY</b>		<b>2001 FEDERAL WILDLAND FIRE MANAGEMENT POLICY</b>	
<b>Science</b>		Fire Management Plans and programs will be based on a foundation of sound science. Research will support ongoing efforts to increase our scientific knowledge of biological, physical, and sociological factors. Information needed to support fire management will be developed through an integrated interagency fire science program. Scientific results must be made available to managers in a timely manner and must be used in the development of land management plans, Fire Management Plans, and implementation plans.	
<b>Preparedness</b>		Agencies will ensure their capability to provide safe, cost-effective fire management programs in support of land and resource management plans through appropriate planning, staffing, training, equipment, and management oversight.	
<b>Suppression</b>		Fires are suppressed at minimum cost, considering firefighter and public safety, benefits, and values to be protected, consistent with resource objectives.	
<b>Prevention</b>		Agencies will work together and with their partners and other affected groups and individuals to prevent unauthorized ignition of wildland fires.	
<b>Standardization</b>		Agencies will use compatible planning process, funding mechanisms, training and qualification requirements, operational procedures, values-to-be-protected methodologies, and public education programs for all fire management activities.	
<b>Interagency Cooperation &amp; Coordination</b>		Fire management planning, preparedness, prevention, suppression, fire use, restoration and rehabilitation, monitoring research, and education will be conducted on an interagency basis with the involvement of cooperators and partners.	
<b>Communication &amp; Education</b>		Agencies will enhance knowledge and understanding of wildland fire management policies and practices through internal and external communication and education programs. These programs will be continuously improved through the timely and effective exchange of information among all affected agencies and organizations.	
<b>Agency Administrator &amp; Employee Roles</b>		Agency administrators will ensure that their employees are trained, certified, and made available to participate in the wildland fire program locally, regionally, and nationally as the situation demands. Employees with operational, administrative, or other skills will support the wildland fire program as necessary. Agency administrators are responsible and will be held accountable for making employees available.	
<b>Evaluation</b>		Agencies will develop and implement a systematic method of evaluation to determine effectiveness of projects begun under the 2001 Federal Fire Policy. The evaluation will assure accountability, facilitate resolution of areas of conflict, and identify resource shortages and agency priorities.	

## VII Relationship of the SMMNRA Fire Management Plan To Resource Management

Planning in the SMMNRA begins with the park's *General Management Plan* (GMP). SMMNRA's original GMP, adopted in 1980, was recently updated and officially adopted as of July, 2002. The SMMNRA's *General Management Plan* is the foundation document for managing the park. Implementation plans, which tier off of general management plans, focus on "how to implement an activity or project needed to achieve a long-term goal" (NPS 1998). The authority to prepare general management plans, as well as implementation plans, for national parks is given by the NPS Organic Act of 1916. The *Resource Management Plan* is such an implementation plan, and directives for preparing resource management plans are found in NPS Management Policies 2001, Chapter 4.

### *General Management Plan*

The GMP mission goals are those goals that incorporate the mission, law, core values, and policies of the three principal park agencies to manage the recreation area (GMP, p. 38-44). Fire management will be consistent with the mission goals and include strategies to support and implement those goals.

- Protect and enhance species, habitat diversity and natural processes within the SMMNRA.
- Protect and restore native plant species and plant communities, such as coastal sage scrub, coastal live oak woodland, and valley oak savannas.
- Enact programs to combat and remove the encroachment of exotic flora and fauna into natural ecosystems when possible.
- Manage fire throughout the recreation area to mimic natural fire regimes as much as possible and reduce the threat of wildfires.
- Maintain or improve water quality throughout the SMMNRA. Manage riparian communities, natural stream characteristics, estuaries and coastal waters for their significant ecological value.
- Implement collaborative scientific research and innovative resource management programs among federal, state and local agencies to manage, restore, and maintain natural processes.

The NPS's policies with respect to fire and fire management in SMMNRA's are described in the *General Management Plan* (2003) and the *Resource Management Plan* (1999).

The *General Management Plan* (p. 207) states:

*"It is the policy of Santa Monica Mountains National Recreation Area to manage natural*

*areas in a manner that maintains and enhances ecological values while at the same time assuring public safety. The goal is to implement a fire management program that helps to maintain a fire regime that sustains natural biotic associations and ecosystem functions while providing effective and strategic defenses against wildfire.*

*The park's prescribed burning program would be revised to reflect an increased understanding of the potential ecological impacts of prescribed burning, a new understanding of extreme-weather fire behavior, and a recognition of the limited capacity of government agencies to implement prescribed burning. To this end, ecological management zones would be defined and established where vegetation is managed for ecological values, and dynamic fuel management zones for hazard reduction at the wildland urban interface."*

## **Resource Management Plan**

The *Resource Management Plan* (p. III-69) identifies the need to develop an ecologically based fire management program as a top priority conservation and restoration project as follows:

*"Recent information on the effects of fire frequency, intensity, and extent on ecological communities in southern California, and new data on the effectiveness of prescribed fire programs to reduce wildfire risk, has led to a reassessment of fire management in the park. Currently the park is working to update its fire management program to reflect the most up-to-date scientific information. Ideally, an interagency fire management program implemented throughout the SMMNRA and surrounding region can be developed."*

Finally, the *Resource Management Plan* identifies fire as *"an important ecological tool that resource managers can employ to achieve specific conservation or restoration objectives."*

Several specific examples are identified as top priority conservation and restoration projects (RMP, p. III-67).

- 1) Restoration of Valley Oak Savanna: Explore the use of fire management for control of exotic annual grasses and the direct and indirect benefits and impacts of prescribed burning on oak establishment.
- 2) Restoration of Native Grasslands: Use fire to remove exotics and promote native species response.

## **Endangered Species Act**

The Endangered Species Act requires that actions authorized, funded, or carried out by federal agencies not jeopardize the continued existence of listed species. Under section 7(a)(2) of the ESA (16 USC section 1536), federal agencies are required to consult with the U.S. Fish and Wildlife Service (USFWS) on actions which may affect listed species or critical habitat. Because this *SMMNRA Fire Management Plan* proposes actions that could affect the federally listed plant species and wildlife species in the Santa Monica Mountains, NPS will consult with USFWS on likely effects to those species.

## VIII Interdisciplinary Planning Team

This environmental impact statement was produced by a 6-person interdisciplinary planning team that shared responsibility for scoping, researching, and writing. The team was comprised of staff specialists in the following disciplines: fire management, natural and cultural resources, plant ecology, public information and education, and fire ecology. Other subject matter experts contributed technical expertise for specific sections. A list of planning team members and other consultants is included in Chapter 6.

## IX Decisions to be Made

The NPS will seek comments and observations from other agencies, interested organizations, and the public before selecting an environmentally preferred alternative in the final EIS. Several workshops and meetings with agencies and organizations at all levels will be conducted. Two public comment periods and eight public meetings will be held to solicit the public's involvement. Information obtained from this participation will be analyzed for its environmental affects and possible mitigation measures and will be addressed in the final EIS. Then, with consideration of applicable laws and policies, the environmentally preferred alternative will be selected.

The selected alternative then becomes the basis of the *SMMNRA Fire Management Plan*, which is the 5-year implementation plan for the park's fire management actions. After five years, the *SMMNRA Fire Management Plan* will be reviewed and changed as necessary. Substantial changes, not previously analyzed as part of the environmental impact statement, would require additional environmental review consistent with NEPA and NHPA.

## X Public Scoping and Issues Considered

Public scoping provides the opportunity for the public to provide input to the park on issues and alternatives that should be considered in the EIS. An "issue" is a concern that must be considered when designing and evaluating alternatives in an environmental assessment. Some issues come from requirements found in policy and law. For example, an EIS must consider plants, animals, special status species, and their habitats, water, soil erosion, wetlands, riparian areas, air quality, cultural resources, and firefighter/public safety. Additional issues are identified through the input from public and internal scoping meetings.

Agencies, cooperators, and other partners were invited to participate in a series of scoping meetings to help define management issues and goals. In addition, the public was invited to participate in a series of workshops designed to solicit comments, suggestions, and ideas (attendees are listed in Appendix D).

- A fire management planning workshop in June 2001 for agencies, cooperators, and other partners. Following the workshop, a newsletter describing the planning effort and issues already raised was released to the workshop participants and other interested

parties in December 2001. All newsletter recipients were invited to submit additional written comments for consideration.

- A Notice of Intent was published in the Federal Register in February 2002 announcing that SMMNRA was updating its Fire Management Plan, and encouraging public participation through public meetings and written comment within a six month period.
- Four public meetings were announced and publicized through media announcements and public invitations in late April/early May 2002. The meetings were held in Beverly Hills, Calabasas, Malibu, and Thousand Oaks, California. Participants were provided with background and information on four alternatives and asked to submit their comments in writing, if possible, to ensure accuracy.
- Two additional meetings were held in June 2002 to gain additional input on these four alternatives from fire agencies, cooperators, and other partners. Their written comments were also solicited.
- Fifteen invitations were sent to citizens with Native American affiliations, requesting their comments and concerns that the four alternatives may have on cultural activities, practices or resources.

All issues identified during scoping sessions have been documented in Appendix D. Some issues raised are of significant and widespread interest, while others were duplicate or beyond the scope of the plan. Issues raised at the June 2001 workshop and analyzed within the environmental assessment include:

- 1) Firefighter and public safety including: relocation of overhead power lines underground to reduce fire starts from arcing power lines; how to provide information to homeowners so that they implement those measures necessary to provide for their own safety in extreme wildfire; and how to refine existing risk analysis with factors such as density, ingress and egress, fuel loads, fire history to identify high-risk/high-priority areas using GIS and fire models.
- 2) Concentrate on fuels treatments at the wildland urban interface to optimize the effectiveness of property protection and to minimize impacts.
- 3) Operational and policy co-ordination among all the agencies within SMMNRA including consistent brush clearance policies and uniform emergency plans for all the agencies within SMMNRA.
- 4) The impact of fire management activities including suppression actions and promotion of the spread of invasive plants and animals.
- 5) The use of prescribed fire for restoration activities.
- 6) Appropriate land use planning.

## Chapter Two

# ALTERNATIVES

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## I Development of Alternatives

After all interagency and public scoping meetings, the interdisciplinary team developed a range of alternatives that responded to the wide range of comments offered during the agency workshop and other scoping meetings. The alternatives were structured around the fire management tools available to accomplish program goals and objectives. The alternatives are designed to provide effective fire protection at the wildland urban interface while protecting ecological and cultural resource values based on a realistic understanding of the nature of the vegetation and the fire climate of the Santa Monica Mountains. The fire management actions in all alternatives apply only to National Park Service (NPS) properties. Related activities such as coordination and consultation with local fire agencies, assessment of fire hazard, and public education apply to all private and public lands within the Santa Monica Mountains National Recreation Area (SMMN-RA) boundary.

## II Description of Alternatives

### *Terminology*

Numerous terms are used throughout this document that describe the different tools used by fire managers. Since the alternatives in this assessment are organized around these tools, it is important to define the terminology that will follow:

- 1) **Wildland Fire Suppression** – means curtailment of fire spread and eliminates all identified threats from the direct and indirect effects of the fire.
- 2) **Mechanical Fuel Reduction** – also referred to as “mechanical projects,” or “mechanical treatments,” means reducing plant biomass with equipment, such as weed whips, brushcutters, or chainsaws, or piling and burning woody debris.
- 3) **Biomechanical Fuel Reduction** – means reducing plant biomass with biological means such as goat or sheep grazing.
- 4) **Weed Abatement** – is annual mowing or disking of herbaceous vegetation dominated by non-native annual grasses and forbs.
- 5) **Brush Clearance** – is fuel reduction in vegetation dominated by native shrubs.
- 6) **Prescribed Fire** – means management-ignited fire.
- 7) **Wildland Fire Use** – also referred to as “fire use” means the management of unplanned ignitions, such as lightning-caused fires, for resource benefit.

- 8) **Wildland Fire Suppression** – also referred to as “fire suppression,” or simply “suppression,” means the suppression of unwanted wildland fires.
- 9) **Strategic Fuels Treatment** – means reduction of plant biomass by either prescribed fire, mechanical or biomechanical fuel treatments in strategic locations that would modify fire behavior to the extent that it would limit fire spread, protect identified values at risk, or allow control of a fire perimeter. Excludes the defensible space created by mechanical fuel modification adjoining individual homes that is required by law in Los Angeles and Ventura Counties.
- 10) **Defensible Space** – an area around a home or other structure where vegetation is modified and maintained to slow the rate or reduce the intensity of an advancing wildland fire. It provides room for firefighters to safely work in and around structures. This space also reduces the probability that a structure fire will spread into the adjacent wildland vegetation.
- 8) **Average Fire Return Interval and Natural Fire Return Interval** – the average fire return interval is the average period of time between all fires for a defined geographic area and for a specific period of time. It is most simply determined by calculating the average time required to burn an area of vegetation equivalent to the defined geographic area of interest. The average fire return interval is also referred to as the average fire rotation interval or the average fire free interval. The natural fire return interval is the fire return interval that would be expected if fires were started only by non-human agents and no fire suppression occurred. In southern California the most common natural ignition source is lightning, although other potential ignition sources such as tumbling rocks have been suggested.

## *Alternatives*

The four alternatives considered in the environmental analysis include a no action alternative (Alternative 1) and three additional alternatives. The National Environmental Policy Act (NEPA) requires agencies to consider a “no action” management alternative which provides a baseline condition for measuring the other alternatives.

- Alternative 1 – No Action (current program) Landscape Mosaic Prescribed Burning
- Alternative 2 – Mechanical Fuel Reduction/ Ecological Prescribed Fire/ Strategic Fuels Treatment
- Alternative 3 – Mechanical Fuel Reduction/ Ecological Prescribed Fire
- Alternative 4 – Mechanical Fuel Reduction (Wildland Urban Interface) / No Prescribed Fire

The current program or no-action alternative (NPS, 1994), involves watershed level prescribed burning to create a landscape mosaic of different age classes in shrubland communities to reduce fire hazard and maintain ecological health. The other alternatives are an additive hierarchy of

the available fire management techniques that are feasible and effective in the fire environment of the Santa Monica Mountains. The simplest alternative (Alternative 4) focuses primarily on mechanical fuel modification at the wildland urban interface. The next alternative includes interface mechanical fuel modification but also adds ecological prescribed burning (Alternative 3). The most complex alternative (Alternative 2) includes interface mechanical fuel modification, ecological prescribed burning and strategic fuels treatment. In addition to the combination of actions unique to each alternative, there are a number of fire management actions that are common to all alternatives and will be implemented irrespective of the final alternative selected. A brief description follows below.

### **Elements Common to all Alternatives**

All alternatives include the following elements:

#### ***Complete suppression of wildfires***

Wildfire suppression is essential to protect the complex interface of development and natural areas within the SMMNRA. However, even with aggressive suppression of all wildfire starts, there are periodic large wildfires and an unnaturally short average fire return interval. Fire suppression has not excluded fire from the SMMNRA and has not caused unnaturally high fuel accumulations. Fire suppression provides some ecological benefit by reducing the total number of acres burned in wildfires and marginally increasing the average fire return interval.

#### ***Coordination of vegetation management with local fire agencies to improve the effectiveness of fire suppression activities involving NPS lands***

Through coordinated efforts with the local fire agencies, vegetation management activities can occur across jurisdictional boundaries, increasing the overall effectiveness of the treatments by providing for the utilization of strategic geographic features. Without interagency cooperation, fire agencies are restricted by political boundaries which often do not coincide with the physical features which provide for the optimum placement of vegetation management projects.

#### ***Consultation with local fire agencies to protect resources during suppression activities***

Through the use of the Incident Command System the park will provide the primary suppression agency with information concerning sensitive resources that may be impacted during fire suppression operations. This consultation will assure that any impacts to cultural or natural resources are minimized and that resource protection is integrated in to the strategic planning of all fire suppression operations.

#### ***Assessment of wildland fire hazards to people, homes, and resources; use public support and education to reduce the associated risks***

An essential element in addressing wildland urban interface (WUI) issues is determining what the hazards to humans, homes, and the surrounding natural and cultural resources are, and where they are located. Once these factors have been identified, then priorities will be established to reduce the associated risks to those assets. An indispensable part of reducing these risks is to have homeowners and residents assume personal responsibility for their properties. Park staff will provide education and assistance to this end.

### Alternative 1 (No Action Alternative)

**Continue the current NPS fire and vegetation management program to create a landscape mosaic of varying aged chaparral stands through the application of prescribed fire in separate watersheds; minimize brush clearance.**

This alternative has the potential to be ecologically damaging to native plant communities by increasing the probability of shrubland type-conversion from a too-short fire return interval in the high fire frequency fire environment of the Santa Monica Mountains. It does not provide direct protection for residences by reducing fuel loads at the wildland urban interface because treatments are often remote from residential development because of the danger of prescribed fire escape. Prescribed fire in dense vegetation has the potential to escape and become a hazard itself. Alternative 1 does not provide effective control of wildfire spread under severe weather conditions because ecologically viable vegetation can not be maintained in the age class that might be effective in limiting wildfire spread under extreme wildfire conditions. Finally, large scale burning has not been feasible to implement in accordance with the goals of the previous *Fire Management Plan* because of regulatory constraints on prescribed fire, especially those relating to air quality standards.

### Alternative 2

**Prescribed burning is used to provide resource enhancement. In addition, hazard fuel reduction projects using prescribed fire or mechanical fuel reduction are considered in strategic locations that reduce the chance of wildfires which may damage life and property or impact natural and cultural resources. Short-term and site-specific resource impacts of strategic prescribed fires are weighed against long-term and regional hazard fuel reduction benefits. Strategic zones are identified using up-to-date analysis of vegetation types, fuel characteristics, fire spread models, and potential hazards to life, property, and natural and cultural resources. Mechanical or biomechanical fuel reduction is concentrated at the wildland urban interface to protect homes.**

This alternative provides effective protection of homes by focusing mechanical fuel reduction at the interface between homes and wildland vegetation, and provides ecological benefits from resource prescribed burning. In addition, it provides potential ecological and community benefits where wildfire risk analysis can identify locations where strategic fuel modification projects can modify fire behavior to the extent that it would limit fire spread, protect social values, or allow control of a fire perimeter. This alternative requires that the ecological impacts from maintaining vegetation in a condition adequate to sustain strategic fuel modification benefits be explicitly identified and that the social and environmental cost:benefits be jointly weighed.

### Alternative 3

**Prescribed burning is used exclusively to provide resource enhancement including control of exotic species and restoration of natural communities. Mosaic burning is eliminated. Fuel reduction is concentrated at the wildland urban interface to protect existing development and emphasizes mechanical or biomechanical fuel modification.**

This alternative provides effective protection of homes by focusing mechanical fuel reduction at the interface between homes and wildland vegetation, and provides ecological benefits from resource prescribed burning. It lacks the potential risk reduction benefits from strategic fuel modification.

#### Alternative 4

**Vegetation management is limited to mechanical or biomechanical fuel modification at the wildland urban interface. Prescribed fire is eliminated.**

This alternative provides effective protection of homes by focusing mechanical fuel reduction at the interface between homes and wildland vegetation, but lacks the ecological benefits of resource prescribed burning, and the potential risk reduction benefits from strategic fuel modification.

Table 2-1 Summary of Alternatives

<b>Alternative 1</b> No Action (Current Program)	<b>Alternative 2</b> Mechanical Fuel Reduction/ Ecological Prescribed Fire/ Strategic Fuels Treatment	<b>Alternative 3</b> Mechanical Fuel Reduction/ Ecological Prescribed Fire	<b>Alternative 4</b> Mechanical Fuel Reduction
<p><b>General Description</b>                      The current program is continued including use of prescribed fire to establish a shifting mosaic of different aged stands of chaparral, application of fire suppression, and use of mechanical treatments near existing structures on park and private properties.</p>	<p><b>General Description</b>                      The program focuses on the strategic use of prescribed fire to reduce hazardous fuels, while considering ecological constraints and potential impacts, and to meet resource enhancement objectives.                       All other fires are suppressed, including infrequent lightning ignitions.                       Mechanical fuel reduction is used in and around developments that pre-date park acquisition, to buffer these sites from unplanned fires.                       Homeowner education is emphasized.</p>	<p><b>General Description</b>                      The program focuses on the use of prescribed fire exclusively to meet resource enhancement objectives.                       All other fires are suppressed, including infrequent lightning ignitions.                       Mechanical fuel reduction is used in and around developments that pre-date park acquisition, to buffer these sites from unplanned events.                       Homeowner education is emphasized.</p>	<p><b>General Description</b>                      The program focuses on mechanical fuel reduction in and around developments that pre-date park acquisition.                       All fires are suppressed.                       Homeowner education is emphasized.</p>
<p><b>Prescribed Fire</b>                      Prescribed fire projects are used to establish a shifting mosaic of different aged stands of chaparral across the landscape.</p>	<p><b>Prescribed Fire</b>                      Prescribed fire is used as a tool for targeted resource enhancement projects. In addition, hazard fuel reduction projects using prescribed fire are considered in strategic locations that reduce the chance of wildfires which may damage life and property, and impact natural and cultural resources.</p>	<p><b>Prescribed Fire</b>                      Prescribed fire is used exclusively as a tool for targeted resource enhancement projects.</p>	<p><b>Prescribed Fire</b>                      None. Prescribed fire is not used under this alternative.</p>

<b>Alternative 1</b> No Action (Current Program)	<b>Alternative 2</b> Mechanical Fuel Reduction /Ecological Prescribed Fire /Strategic Fuels Treatment	<b>Alternative 3</b> Mechanical Fuel Reduction /Ecological Prescribed Fire	<b>Alternative 4</b> Mechanical Fuel Reduction
<b>Wildland Fire Use</b> None. All unplanned fires are suppressed.	<b>Wildland Fire Use</b> None. All unplanned fires are suppressed.	<b>Wildland Fire Use</b> None. All unplanned fires are suppressed.	<b>Wildland Fire Use</b> None. All unplanned fires are suppressed.
<b>Wildland Fire Suppression</b> All unplanned fires are suppressed.	<b>Wildland Fire Suppression</b> All unplanned fires are suppressed.	<b>Wildland Fire Suppression</b> All unplanned fires are suppressed.	<b>Wildland Fire Suppression</b> All unplanned fires are suppressed.
<b>Mechanical/ Biomechanical Fuel Reduction</b> Limited mechanical or biomechanical fuel reduction is used in developed areas and along boundaries.	<b>Mechanical/ Biomechanical Fuel Reduction</b> Mechanical or biomechanical fuel reduction is the <b>primary</b> tool for hazard fuel reduction along the wildland urban interface.	<b>Mechanical/ Biomechanical Fuel Reduction</b> Mechanical or biomechanical fuel reduction is the <b>primary</b> tool for hazard fuel reduction along the wildland urban interface.	<b>Mechanical/ Biomechanical Fuel Reduction</b> Mechanical or biomechanical fuel reduction is the <b>only</b> tool for hazard fuel reduction along the wildland urban interface.
<b>Strategic Fuels Reduction</b> None.	<b>Strategic Fuels Reduction</b> Hazard fuel reduction projects using prescribed fire or mechanical or biomechanical fuel reduction are considered in strategic locations that provide a measurable reduction in fire hazard risk to life and property or natural and cultural resources. The site-specific resource impacts from treatment are weighed against regional fire hazard reduction for short-term and long-term benefits and impacts.	<b>Strategic Fuels Reduction</b> None.	<b>Strategic Fuels Reduction</b>

### III Quantification of the Amount of Managed Acreage by Alternative

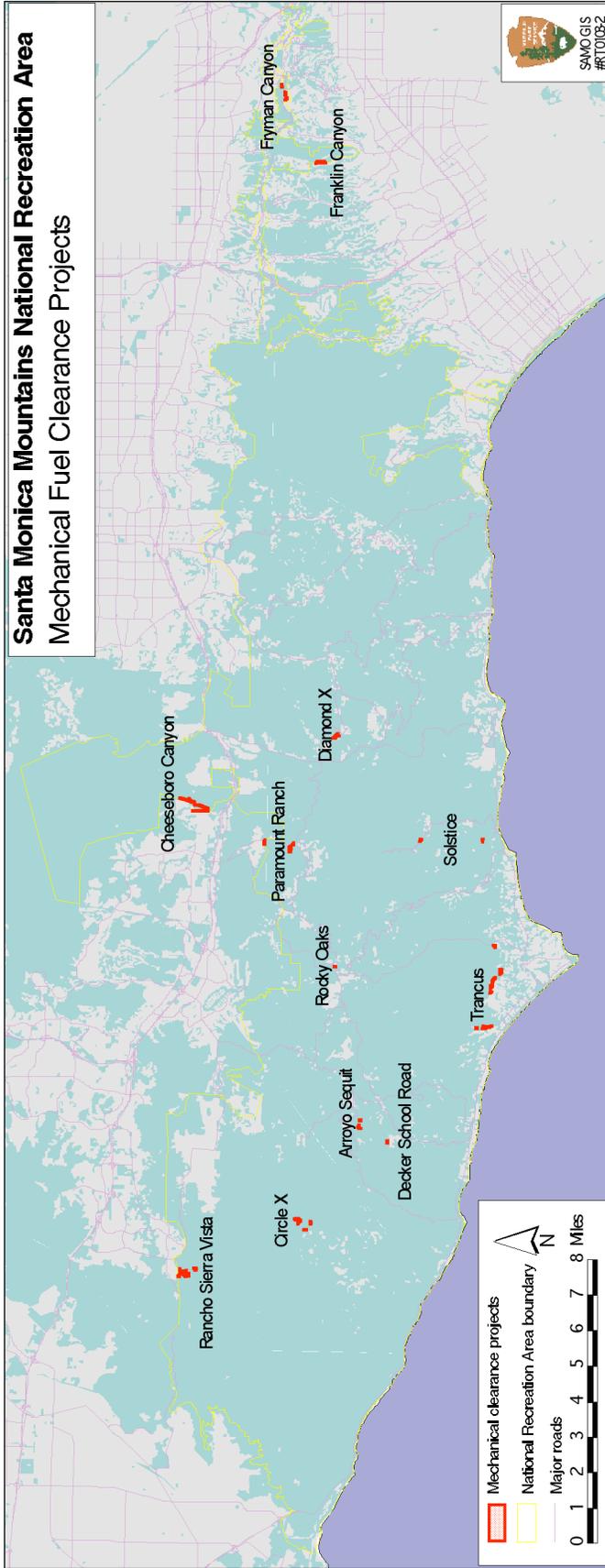
The following tables (Tables 2-2 and 2-3) predict the range in the amount of acreage that is managed on the various park units according to each alternative for the five-year life of the fire management plan. Acres projected in the tables reflect the minimum and maximum area that would be managed by all treatment methods including fuel modification, prescribed fire, and fire suppression. Past experience has shown that fire activity varies widely from year to year due to both stochastic factors (ignitions) and large-scale climactic variations such as El Nino and La Nina. Therefore, the numbers included in these tables are intended only for comparison between alternatives over long time periods and do not represent specific annual targets to be achieved. These projections will be used for analysis purposes throughout the document.

To develop these projections, the interdisciplinary planning team estimated the acreage that would be affected by each management tool (mechanical fuel reduction, prescribed fire, and wildland fire suppression) under each alternative.

**Table 2-2 Range of Projected Annual Acreage on NPS Lands Managed by Alternative Over the First Five Years.**  
 Mechanical fuel reduction areas are mapped in Figure 2-1. Potential ecological prescribed burn locations are mapped in Figure 2-2.

		TREATMENT ACRES					Five Year Totals
	Mechanical Fuel Reduction		Prescribed Fire		Wildland Fire Suppression	Total Treated Acres	Treated
	Wildland Urban Interface	Cultural Resources	Ecological	Strategic			
<b>Alternative 1</b> No Action (Current Program)	86.2 acres/year	4.2 acres/year		1000 – 1500 acres/year (6540 acres/5 years) 1994 FMP for Natural Processes and Hazard Fuel Reduction (not achievable)	0 – 50,000 acres/year	1090 – 1,590 acres/year	6630 acres
<b>Alternative 2</b> Mechanical Fuel Reduction / Ecological Prescribed Fire / Strategic Fuels Treatment	86.2 acres/year	4.2 acres/year	0 – 1100 acres/year 275 acres/project 4 projects/year maximum	0 – 300 acres/year 150 acres/project 2 projects/year maximum (750 acres/5 years) NEPA & NHPA review and documentation required for individual projects	0 – 50,000 acres/year	90 – 1490 acres/year	450 – 7450 acres
<b>Alternative 3</b> Mechanical Fuel Reduction / Ecological Prescribed Fire	86.2 acres/year	4.2 acres/year	0 – 1100 acres/year 275 acres/project 4 projects/yr maximum	0 acres/year	0 – 50,000 acres/year	90 – 1190 acres/year	450 – 5950 acres
<b>Alternative 4</b> Mechanical Fuel Reduction	86.2 acres/year	4.2 acres/year	0 acres/year	0 acres/year	0 – 50,000 acres/year	90 acres/year	450 acres

**Figure 2-1 Map of WUI Mechanical Fuel Modification Zones on NPS Lands**  
 Acreage for each park unit is listed in Table 2-3.



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**Table 2-3 Fuel Modification and Prescribed Burn Areas on NPS Lands by Park Unit**

Park units are mapped in Figure 2-3. Wildland Urban Interface (WUI) hazard reduction zones are mapped in Figure 2-1. Potential ecological prescribed burn areas are mapped in Figure 2-2. The acreage for ecological prescribed burn represents the total area within each park unit of plant community types that are potentially appropriate for restoration using prescribed burning.

Park Unit (NPS park parcels see map)	Vegetation Type	Time since last burn	Unit size	Housing Density Downwind	WUI Hazard Reduction	Ecological Prescribed Burn
<b>LARGE TRACTS</b>						
Zuma/Trancas	Chap/CSS	1978	6300	High	<b>16.1</b>	
Cheeseboro/ Palo Comado	Chap/CSS/ Oak/Grass	1982	4500	High	<b>22</b>	<b>865</b>
Circle X & Malibu Springs	Chap/RSH/ Rip/CSS	1993, 1956, 1985	4500	Low	<b>11.6</b>	
Paramount	Chap/CSS/ Oak/Grass	1982, 1978	760		<b>5.8</b>	<b>96</b>
Castro Crest	Chap/Oak CSS	1982	1400	Low		
Rancho Sierra Vista	Chap/CSS/ Grass	1993	1200	Low	<b>12.8</b>	<b>275</b>
Deer Creek	Chap/CSS/ Riparian	1993, 1989	460	Low		8
Arroyo Sequit	Chap/CSS	1985(80%) 1956(20%)	160	Low	<b>2.3</b>	
Westlake	Chap	1978	150			
Rocky Oaks	Chap/VOak /Riparian	1978	200	Low	<b>0.9</b>	
Yellow Hill	Chap/CSS /Grass	1993	400	High		
Serrano	Chap	1993	230	Low		
Hondo Canyon	Chap	1993	165	Medium		
Peter Strauss Ranch	Chap/Oak	1978	80	Low		
Solstice Canyon	Chap/Oak /Riparian	1996, 1982	550	Low	<b>1.4</b>	
Liberty Canyon	CSS/Oak /Grass	1993, 1982 1984, 1931	410	High		
<b>SMALL TRACTS</b>						
Franklin Canyon	Chap/Oak/ CSS/Riparian	pre-1925	110	High	<b>4.2</b>	
Fryman Canyon	Chap	pre-1925	70	High	<b>3.4</b>	
Las Flores / Camp	Chap	1993 (95%)	120	High		
Carlisle	Chap	1993	80	Low		
Pacific View	Chap/CSS	1993 1989	40	V Low		
Etz Meloy	Chap/Grass	1985	155	Low		

Park Unit (NPS park parcels see map)	Vegetation Type	Time since last burn	Unit size	Housing Density Downwind	WUI Hazard Reduction	Ecological Prescribed Burn
Triunfo	Chap/Grass	1985	25	Low		
Little Sycamore	Chap	1993	60	Low		
Malibu Springs satellite	Chap	1956	10	Low		
Nicholas Flats	Chap	1956 (50%) 1985 (50%)	23	High		
Decker School	Chap/CSS	1985	80	High	1	
Decker Canyon	CSS/Riparian	1985	50	High		
Lower Brewster	Oak/Chap	1978	38	Low		
Seminole Hot Springs and Hennesy	Chap/Oak	1978	250	Low		
Malibu Lake	Chap	1978 (40%) 1958 (10%) pre 1925 (50%)	57	Low		
Ramirez Canyon	Chap	1978(95%) 1982 (5%)	47	Low		
Malibu Vista	Chap	1982	25	Low		
Corral Canyon (Malibu Bowl)	Chap	1982	105	Medium	0.8	
El Nido	Chap	1996 (80%) 1970 (15%) 1982 (5%)	80	Medium		
Diamond X West	Chap/CSS	1996 (80%) 1970 (20%)	18	Low		
Diamond X East	Oak/Chap /VOak/CSS	1996	22	Low	3.9	3
Monte Nido	Chap		5	Low		
Piuma	CSS/Chap	1993(80%) 1996 (20%)	6	Low		
Saddle Peak	Chap	1993	15	Medium		
Fishhook	Chap/ Walnut	Pre-1925	14	High		
Topanga NW	Chap/CSS	1961	43	Low		
Topanga Oaks	Grass/Chap	1993	15	High		8
Tuna Canyon	Chap	1993	25	High		
<b>TOTAL <sup>1/</sup></b>					<b>86.2</b>	<b>1255</b>

1/ Of 86.2 acres of WUI mechanical fuel modification, 78.5 acres are weed abatement, 7.7 acres are brush clearance.

KEY		
Chap chaparral	Grass grassland	CSS coastal sage scrub
Oak oak woodland	VOak valley oak savanna	Rip riparian

## *Mechanical Fuel Reduction Projects*

Mechanical fuel reduction is proposed in all alternatives. Wildland urban interface (WUI) fuel reduction is located in those areas where the park has inherited or established and maintained a fuel break between park properties and pre-existing development. Because Los Angeles and Ventura Counties do not permit new development that requires vegetation clearance on park property, there should be no need to expand the zone of mechanical fuel modification beyond those areas that are already maintained by the park. Additional fuel reduction is performed as part of maintenance actions around cultural resource sites and is limited to 4.2 acres. The size of the average WUI mechanical fuel reduction projects is 6 acres, with projects ranging from 1-22 acres (Table 2-3). To maintain the effectiveness of the fuel modification zones, herbaceous vegetation needs to be reduced annually, while shrubs and trees need to be limbed or removed only every few years.

As part of planning for mechanical fuel reduction projects, individual sites will be assessed by qualified park staff for the presence of special status species and for significant cultural resources. Site specific recommendations for protection of sensitive resources will be incorporated into planning and implementation, and the project would proceed only if the balance between protecting sensitive resources and private property was consistent with NPS policy and other legal requirements.

Should “adverse effect” or “incidental take” of any threatened or endangered species be expected by implementation of site specific projects, supplemental environmental compliance would be pursued.

## *Wildland Fire Suppression*

Under all alternatives, suppression activities will include a full range of tactics to confine, contain, and control wildland fires. All suppression actions would follow minimum impact suppression guidelines (Appendix C) and would include appropriate burned area emergency rehabilitation of firelines and other effects of the suppression action.

Expected sizes of suppression incidents range from extremely small (<0.1 acre) to very large. Several suppression incidents near and within the recreation area boundary in the 1990’s have ranged from 10,000 to 38,000 acres. Larger fires are possible though rare.

When determining suppression tactics, collateral damage to park resources as a result of the proposed suppression action will be considered as long as firefighter and public safety, and private property are not jeopardized.

## *Prescribed Fire Projects*

Prescribed fire would be used in Alternatives 1, 2 and 3. Alternative 1, the no action alternative, places the most emphasis on this tool, followed by Alternative 2 then 3. Alternative 1 would use

prescribed fire as in the past; however, the goals have proved unachievable in the past due to the constraints associated with prescribed burning in a high-population area.

Alternative 2 has more realistic goals for achieving prescribed fire projects. Alternative 3 also has realistic goals for achieving prescribed fire projects; however this tool would be used for restoration purposes only, not for considering strategic areas for hazard fuel reduction. In all cases, projects would generally not exceed 275 acres at any one time. It is expected that the largest projects would be approximately 150 acres. There is also the potential for very small (<10 acres) experimental research burns.

### ***Strategic Fuels Reduction Projects***

Strategic fuels reduction is proposed only in Alternative 2. The park has proposed 150 acres/project with a maximum of 2 projects/year as the amount of acreage on NPS properties that could realistically and reliably be treated by park personnel in co-operation with their partner agencies. Any strategic fuels reduction project would require a separate environmental assessment and a risk/benefits analysis that could demonstrate a measurable increase in operational wildfire management ability or a quantifiable reduction in fire hazard risk in accordance with the decision model outlined in Figure 3-23.

### ***Wildland Fire Use***

All alternatives including this tool (management of unplanned ignitions for resource benefit) have been rejected because wildland fire use is not feasible to implement in high-population areas without being a considerable threat to public safety.

### ***Annual Planning***

Each year park managers would develop a detailed plan describing projects that are planned for implementation that year. Individual projects would fall within the scope of the descriptions above. Table 2-4 outlines the limitations or constraints that would exist for both projects and annual programs.

Table 2-4 Summary Scope of Individual Projects and Annual Program on NPS Lands

Alternative 1 No Action (Current Program)	Alternative 2 Mechanical Fuel Reduction/ Ecological Prescribed Fire/ Strategic Fuels Treatment	Alternative 3 Mechanical Fuel Reduction/ Ecological Prescribed Fire	Alternative 4 Mechanical Fuel Reduction
<p><b>Mechanical Fuel Reduction</b></p> <p>Project Size: 90 acre maximum</p> <p>Number of Projects/ Year: See Table 2-3</p>	<p><b>Mechanical Fuel Reduction</b></p> <p>Project Size: 90 acre maximum</p> <p>Number of Projects/ Year: See Table 2-3</p>	<p><b>Mechanical Fuel Reduction</b></p> <p>Project Size: 90 acre maximum</p> <p>Number of Projects/ Year: See Table 2-3</p>	<p><b>Mechanical Fuel Reduction</b></p> <p>Project Size: 90 acre maximum</p> <p>Number of Projects/ Year: See Table 2-3</p>
<p><b>Ecological Prescribed Fire Projects</b></p> <p>0</p>	<p><b>Ecological Prescribed Fire Projects</b></p> <p>Project Size: 275 acre maximum</p> <p>Number of Projects/ Year: 4</p>	<p><b>Ecological Prescribed Fire Projects</b></p> <p>Project Size: 275 acre maximum</p> <p>Number of Projects/ Year: 4</p>	<p><b>Ecological Prescribed Fire Projects</b></p> <p>0</p>
<p><b>Strategic Fuels Projects</b></p> <p>Project Size: 1500 acre maximum</p> <p>Number of Projects /Year: 2</p>	<p><b>Strategic Fuels Projects</b></p> <p>Project Size: 150 acre maximum</p> <p>Number of Projects /Year: 2</p>	<p><b>Strategic Fuels Projects</b></p> <p>0</p>	<p><b>Strategic Fuels Projects</b></p> <p>0</p>
<p><b>Wildland Fire Use Projects</b></p> <p>0</p>			
<p><b>Wildland Fire Suppression Actions</b></p> <p>Project Size: any size</p> <p>Number of Projects/ Year: variable unknown</p>	<p><b>Wildland Fire Suppression Actions</b></p> <p>Project Size: any size</p> <p>Number of Projects/ Year: variable unknown</p>	<p><b>Wildland Fire Suppression Actions</b></p> <p>Project Size: any size</p> <p>Number of Projects/ Year: variable unknown</p>	<p><b>Wildland Fire Suppression Actions</b></p> <p>Project Size: any size</p> <p>Number of Projects/ Year: variable unknown</p>

## IV Alternatives Considered But Rejected

Three alternatives were considered but rejected from further consideration because the interdisciplinary team determined that they were not feasible for one or more specific reasons.

- **Alternative 5** – Suppression Only/No Vegetation Manipulation
- **Alternative 6** – Mechanical Fuel Reduction on a Landscape Level
- **Alternative 7** – Wildland Fire Use

In particular, the alternatives were inconsistent with NPS policies and guidelines, were a threat to public safety, were logistically infeasible, or were inconsistent with the goals of the fire management program. A summary of specific rejection criteria for each alternative are indicated in Table 2-5.

Table 2-5 Rejected Alternatives

Justification For Rejection	Alternative 5 Suppression Only / No Vegetation Manipulation	Alternative 6 Mechanical Fuel Reduction on a Landscape Level	Alternative 7 Wildland Fire Use
Inconsistent with NPS Policies and Guidelines	X	X	
Threat to public safety if implemented	X		X
Logistically infeasible to implement along wild-land urban interface			X
Inconsistent with objectives of SMMNRA Fire Management Program	X	X	

## V Environmentally Preferred Alternative

Alternative 2 is the environmentally preferred alternative. It provides the maximum potential environmental benefits and minimizes the adverse impacts of fire management actions.

Alternative 2 is the most flexible alternative, utilizing all available fire management strategies identified to be appropriate in the Santa Monica Mountains.

Alternative 1 is inappropriate and the most environmentally damaging alternative in the fire climate of the Santa Monica Mountains. Alternative 4 effectively addresses structure protection at the wildland urban interface, but does not provide any of the ecological benefits from the ecological prescribed burning included in Alternatives 2 and 3. Alternative 2 is considered superior to Alternative 3 because it would not eliminate the potential benefits from strategic fuels reduction. Although strategic fuels reduction has the potential for both impacts and benefits in most of the impact areas analyzed, individual strategic fuels reduction projects would be evaluated for their potential risk:benefit ratio according to the analytical procedure outlined in the discussion of fire hazard assessment (Figure 3-18).

## VI Mitigation Matrix

Table 2-6 Mitigation Measures to Reduce Wildland Fire and Fire Management Impacts

Issue	Potential Impact	Mitigation Actions
Vegetation	<p>Wildfire suppression operational impacts – native vegetation loss, habitat fragmentation, weed invasion</p> <p>Fuel modification – loss of native vegetation, weed invasion</p>	<p>Existing roads, fuel breaks, and trails should be used for fire lines; new line construction should be limited to the greatest extent feasible.</p> <p>Sensitive habitats that could be impacted by operational activities should be identified by NPS on a GIS database and made available at the Incident Command Post. Fire operations should avoid sensitive habitat areas, especially streams and woodlands, to the maximum extent feasible. Suppression activities should minimize impacts in accordance with the operational guidelines in Appendix C.</p> <p>Trees should be avoided and preserved during line construction and other operations requiring vegetation clearance, to the maximum extent feasible.</p> <p>NPS GIS weed maps should be made available at the Incident Command Post. Suppression activities that could promote weed spread should be minimized. Fire lines should be restored to natural grade and to conditions that will encourage native plant growth and avoid weed invasions. Monitor for weed invasion from fire activities and provide for removal if necessary. See Appendix E for invasive species and weed management plans.</p> <p>All park fuel modification zones should be monitored for the presence of serious invasive plant species. Species known to be aggressive invaders of wildland areas, particularly perennial herbs and shrubs, should be controlled as part of the mechanical fuel treatment activity. See Appendix E for invasive species and weed management plans. Where topography permits, annual grasslands should be mowed rather than disked.</p>

Issue	Potential Impact	Mitigation Actions
	<p>Unnecessary vegetation removal and conversion that degrades habitat without increasing fire safety; fire ignitions</p>	<p>Develop a clear policy statement and procedures to assess existing and potential fuel modification responsibility for properties at the private/public interface with federal parkland. See Appendix A for example.</p> <p>NPS should continue to consult with Los Angeles County and Ventura County Fire Prevention and Planning Departments on structure siting adjacent to park property so that fire safety for new development can be ensured without vegetation clearance on park properties.</p> <p>To minimize fuel modification zones, the NPS and other agencies should work together to identify the amount of fuel modification required to protect structures from radiative heat loss or from loss due to direct flame impingement. The NPS should analyze the potential cumulative habitat impacts from fuel modification that exceeds the amount necessary to protect structures (e.g. 100' vs. 200').</p> <p>The NPS and other agencies should continue to co-operate and improve outreach methods to inform residents about appropriate fuel modification techniques to preserve native species; the use of appropriate native landscaping; the importance of limiting non-natives that increase fuel load; the importance of limiting irrigation; the importance of preserving slope vegetation; and appropriate structure siting to limit the size of the required fuel modification zone.</p> <p>The NPS and other agencies should continue to co-operate in all activities that promote fire prevention in order to reduce fire frequency. Direct park actions include park closures during extreme weather and appropriate limitations on camp fires. The NPS should continue to evaluate the cause of fires and support projects that effectively limit fire starts especially arson and power line ignitions. Road clearing projects should be evaluated for effectiveness.</p>

Issue	Potential Impact	Mitigation Actions
<b>Wildlife</b>	See Vegetation.	See Vegetation.
<b>Habitat Connectivity</b>	<p>Habitat fragmentation effects exacerbated by wildfire and suppression operations of habitat fragmentation.</p> <p>Inadequate data available to evaluate impacts due to interaction between wildfire and habitat fragmentation</p>	<p>The NPS and other agencies should work together to identify and protect large, continuous blocks of natural habitat to reduce impacts</p> <p>Fire prevention and suppression techniques should be utilized to reduce the probability of large-scale, catastrophic wildfires in natural areas.</p> <p>See Vegetation.</p> <p>Additional research and monitoring should be undertaken to further understand the relationship between fire and habitat fragmentation. Top priority research needs include:</p> <ul style="list-style-type: none"> <li>• Effects of fire on wildlife under different fire sizes, shapes and intensities, including wildfire and prescribed fire.</li> <li>• Influence of surrounding human-modified landscapes on post-fire wildlife recovery patterns.</li> <li>• Role and significance of fire as a potential extinction mechanism and edge effect facilitator in fragmented habitats.</li> </ul>
<b>Invasive Species</b>	<p>Wildfire suppression operational impacts that promote spread of invasive species</p> <p>Inappropriate fire hazard management by residents</p>	<p>See Vegetation.</p> <p>The NPS and other agencies should to continue to co-operate and improve outreach methods to inform residents about appropriate fuel modification techniques to preserve native species; the promotes weed spread use of appropriate native landscaping; the importance of avoiding invasive non-native species.</p>

Issue	Potential Impact	Mitigation Actions
<p><b>Rare, Threatened, and Endangered Species</b></p>	<p>Hazard reduction projects promote weed spread</p>	<p>Road clearing projects should be evaluated for effectiveness and avoid increasing the area occupied by non-native species.</p>
	<p>Wildfire suppression operational impacts damage or destroys sensitive species or habitat</p>	<p><b>Incident Command Consultation.</b> To avoid operational impacts to populations of sensitive species, it is necessary that sensitive habitat be identified and avoided, to the maximum extent feasible, in accordance with the guidelines in Appendix C. The geographic location and individual vulnerabilities of sensitive species may not be available to the firefighting agencies managing the fire control operations. As with cultural resources information, the NPS should provide a resource advisor for biological consultation to the Incident Command Post. At minimum, this should include a qualified biologist with the sensitive species GIS database who can make recommendations to minimize impacts to any sensitive species potentially affected by fire control operations.</p>
	<p>Fire effects on resident wildlife species in ecological restoration areas</p> <p>Lack of adequate information</p>	<p>Survey all areas for the presence of resident sensitive wildlife species. If present, modify burn plans as necessary to avoid adverse impacts.</p> <p><b>Post-Fire Monitoring Program.</b> The park should be prepared to monitor any sensitive plant populations that experience wildfire in order to develop basic information on fire effects in these species.</p> <p><b>Sensitive Species Database.</b> Basic information on species response to fire should be collected through literature review and field observation. Fire response information should be incorporated into the sensitive species database as part of the I &amp; M program.</p>
<p><b>Geology and Soils</b></p>	<p>Wildfire suppression – accelerated erosion from operational impacts</p>	<p>Existing roads, fuel breaks and trails should be used for fire lines; new line construction should be limited to the greatest extent feasible.</p>

Issue	Potential Impact	Mitigation Actions
	<p>Unmitigable erosion impacts from inappropriately sited structures</p> <p>Reduce soil erosion and the potential for mass movement in fuel modification zones in fuel modification zones</p>	<p>Work with local jurisdictions to develop ordinances to require structure siting to be setback from steep slopes and ridgetops to avoid shrub removal and annual fuel modification on steep slopes.</p> <p>The NPS and other agencies should work together to identify the amount of fuel modification required to protect structures from radiative heat loss or from loss due to direct flame impingement. The NPS should analyze the potential cumulative habitat impacts from fuel modification in fuel modification zones that exceeds the amount necessary to protect structures (e.g. 100' vs. 200').</p> <p>The NPS and other agencies should continue to co-operate and improve outreach methods to inform residents about appropriate fuel modification techniques to preserve native species; the use of appropriate native landscaping; the importance of limiting non-natives that increase fuel load; the importance of limiting irrigation; the importance of preserving slope vegetation; and appropriate structure siting to limit the size of the required fuel modification zone.</p>
<p><b>Water Resources/ Wetlands</b></p>	<p>Avoid direct operational impacts to water resources and wetlands</p> <p>Avoid direct fuel modification impacts to water resources and wetlands</p>	<p>Sensitive riparian or other wetlands that could be impacted by operational activities should be identified by NPS on a GIS database and made available at the Incident Command Post. Fire operations should avoid stream and wetland areas, where feasible. Suppression activities should minimize impacts to the maximum extent feasible in accordance with the operational guidelines in Appendix C.</p> <p>Fire lines should be restored to natural grade and to conditions that will encourage native plant growth and avoid weed invasions.</p> <p>Fuel modification should be avoided in riparian areas and a 100' minimum buffer area provided between riparian/wetland vegetation and fuel modification zones.</p>



Issue	Potential Impact	Mitigation Actions
Air Quality	Smoke impacts from Ecological Prescribed Burning or Strategic Fuel Modification	<p>Burn days will be selected for their ability to transport smoke to upper elevations and lessen the impacts to the local populations.</p> <p><b>Identification of Smoke Sensitive Areas.</b> All high density populous communities should be considered Smoke Sensitive Areas. Burns will be planned to carry smoke away from smoke sensitive areas. Maps of smoke sensitive areas relative to the burn unit will be included in the burn plan (paper version). The map will indicate all possible directions that smoke may impact communities. Residents adjacent to prescribed burns will receive a minimum of 48 hour notification prior to burning.</p> <p>If hazardous or unhealthful smoke conditions occur and become difficult to control under prescribed burn status, the fire can be declared a wildfire in order to cease ignition and suppress it with a full brush response available from Los Angeles and Ventura County Fire Departments. Unhealthful conditions are defined as chronic smoke that exceeds federal ambient air standards (PM-10 exceeding 150 /mg for 24 hours) in a smoke sensitive area. Further ignition is precluded, and immediately reverses the smoke production trend</p> <p>If hazardous or unhealthful smoke conditions are observed (visibility less than three miles) in smoke-sensitive areas, the Fire Management Officer will advise the Chief Ranger and the Public Information Officer. The Fire Information Officer will coordinate notification about the smoke conditions and provide information about potential health impacts, after consultation with the Burn Boss and Fire Management Officer. The Superintendent has the option to close the park area impacted or have the local rangers advise visitors to leave areas impacted by unhealthful smoke, the Fire Information Officer would advise the media and answer phone calls.</p>

Issue	Potential Impact	Mitigation Actions
<p><b>Cultural/ Historic Resources</b></p>	<p>Engine emissions from Mechanical Fuel Modification</p> <p>Minimize fire and operational impacts that damage or destroy cultural resources; inadequate information available to provide resource protection</p>	<p>Offroad diesel-powered equipment not be left idling for more than 5 minutes and it will be maintained in good condition and in proper time.</p> <p><b>Pre-Action</b></p> <ul style="list-style-type: none"> <li>• Cultural resources will be considered during all fire management planning efforts.</li> <li>• Fire management personnel and other staff will receive annual training on cultural resources and fire management actions.</li> <li>• All cultural resources will be evaluated with respect to hazardous fuel loads for prescribed fires. As needed, fuel loads will be reduced using methods commensurate with avoiding or minimizing adverse effects. Maintaining light fuel loads on and in close proximity to cultural resources will be emphasized.</li> <li>• All areas slated for ground disturbing activities will be subjected to pre-action field surveys. This includes areas likely to be disturbed during future wildfires.</li> <li>• Pre-burn survey will be conducted prior to all prescribed burns as dictated by resource distribution and vulnerability, vegetation and topography, and expected fire behavior.</li> <li>• Consultation with local Native American communities will continue to occur in the context of fire management actions. Spiritual sites and important plant communities will be identified and appropriately managed for preservation, maintenance, and/or enhancement.</li> <li>• Computer and other databases containing cultural resources data will be created and maintained, and made available to fire management personnel in the event of emergencies.</li> <li>• Cultural resources specialists from adjacent land management agencies will be consulted in order to coordinate mitigation efforts prior to planned and unplanned fire management actions.</li> <li>• Appropriate cultural resources monitoring protocols will be established and implemented.</li> <li>• Potential research opportunities to study the</li> </ul>

Issue	Potential Impact	Mitigation Actions
<p data-bbox="295 1604 410 1629">Land Use</p>	<p data-bbox="483 1604 837 1671">Amount of area type converted by fuel modification</p> <p data-bbox="483 1709 837 1852">Inappropriately sited development creates a fire safety hazard and a degraded environment</p>	<p data-bbox="867 256 1398 323">effects of fire management actions on cultural resources will be identified.</p> <p data-bbox="867 361 1040 386"><b>During-Action</b></p> <ul data-bbox="867 403 1419 1024" style="list-style-type: none"> <li data-bbox="867 403 1419 588">• A cultural resource specialist or resource advisor will be present during all fire management actions where recorded and unrecorded resources of interest are considered at risk. Additional surveys will be conducted on an as-needed basis.</li> <li data-bbox="867 596 1419 747">• Observations of fire behavior and other variables will be made with respect to recorded cultural resources and/or areas with high probability of containing unrecorded cultural resources.</li> <li data-bbox="867 756 1419 865">• Cultural resources data will be shared with fire management personnel as needed to avoid or minimize adverse effects.</li> <li data-bbox="867 873 1419 1024">• A cultural resource specialist or resource advisor will educate fire management personnel about cultural resources and the potential impacts of fire management actions.</li> </ul> <p data-bbox="867 1062 1008 1087"><b>Post-Action</b></p> <ul data-bbox="867 1104 1419 1570" style="list-style-type: none"> <li data-bbox="867 1104 1419 1255">• The post-action condition of all recorded cultural resources will be assessed. Resources requiring stabilization or other treatment will be mitigated.</li> <li data-bbox="867 1264 1419 1449">• As appropriate, post-action survey will be conducted in previously surveyed and unsurveyed areas. Previously unrecorded cultural resources will be assessed for condition, and stabilization and other protection needs.</li> <li data-bbox="867 1457 1419 1570">• Monitoring and research data will be compiled, evaluated, and used to help refine cultural resource compliance for fire management actions.</li> </ul> <p data-bbox="867 1608 1373 1675">See Vegetation – fuel modification items #3 and #4.</p> <p data-bbox="867 1713 1419 1894">NPS should work with local governments to develop appropriate zoning for structure siting, design, and construction materials in order to avoid development that creates irreconcilable conflicts between fire safety and environmental impacts.</p>

Issue	Potential Impact	Mitigation Actions
<b>Recreation</b>	<p>Trail proliferation along fire lines</p> <p>Adverse perception of fire as “damaging”</p>	<p>Fire lines should be posted and monitored to avoid creating new and undesirable trails after prescribed burns and wildfires.</p> <p>Education walks should be developed on wild fire sites to view wildflower displays that occur in the first two years following wildfires and to educate the public about the fire adapted nature of the Santa Monica Mountains plant communities. Education programs/walks should be developed at prescribed ecological fire sites to show the beneficial uses of fire and the plant restoration needs in the Santa Monica Mountains.</p>
<b>Scenic Resources</b>		
<b>Health and Safety</b>	<p>Wildfire suppression – danger to firefighter safety</p> <p>Wildfire suppression – residents overwhelmed by rapid fire spread</p> <p>Potential health impacts from smoke from prescribed burns</p>	<p>Provide for firefighter safety as a first priority.</p> <p>To prevent loss of life and injury, promote the development of evacuation plans by local agencies and adequate defensible space as a highest priority for community safety.</p> <p>Work with local jurisdictions to develop appropriate zoning to limit new residential development in areas that lack safe ingress and egress due to mid-slope road location, length of access, and heavy fuel load.</p> <p>Provide a minimum of 48 hour notice to residents adjacent to prescribed burn areas.</p>
<b>Reduce Risk of Catastrophic Events</b>	<p>Frequency of catastrophic fires</p>	<p>The NPS and other agencies should to continue to co-operate in all activities that promote fire prevention in order to reduce fire frequency. The NPS should continue to evaluate the cause of fires and support projects that effectively limit fire starts especially arson and power line ignitions.</p>

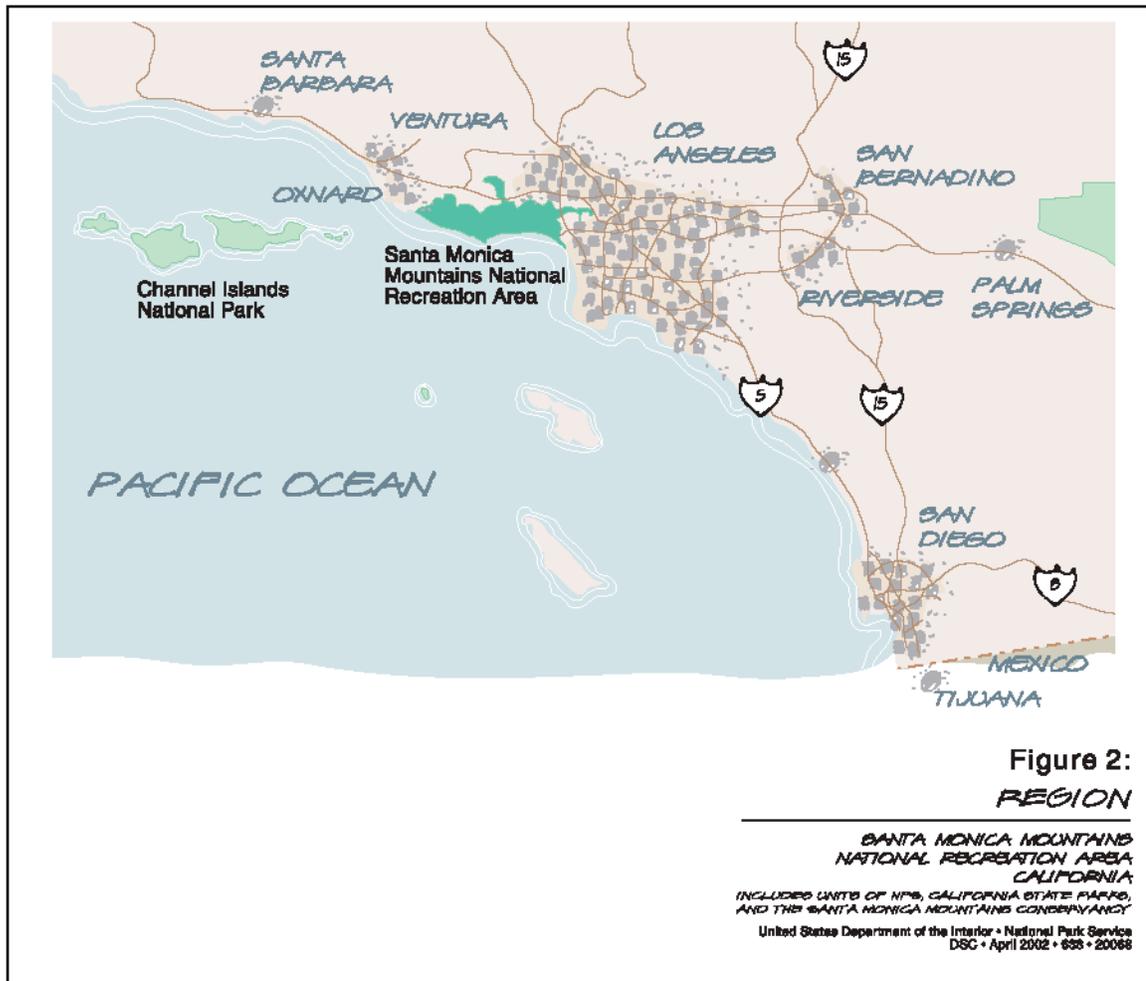
## Chapter Three

# AFFECTED ENVIRONMENT

## I Overview

The Santa Monica Mountains are coastal mountains that form the southernmost mountain chain in the east-west trending Transverse Range of southern California. The Santa Monica Mountains average 7.5 miles in width and have a mean elevation of 1000 feet. The highest point is Sandstone Peak at 3,111 feet with the lowest elevation occurring along the shore at sea level.

Figure 3-I Santa Monica Mountains and Vicinity



The Santa Monica Mountains National Recreation Area (SMMNRA) was established by Congress on November 10, 1978 with the following direction:

*The Secretary of the Interior shall manage the recreation area in a manner which will preserve and enhance its scenic, natural and historic setting and its public health value as an airshed for the Southern California metropolitan area while providing for the recreational and educational needs of the visiting public.*

The SMMNRA is nationally significant because it protects the largest expanse of mainland Mediterranean ecosystem in the national park system. Mediterranean-type ecosystems are globally important because of a limited worldwide geographic distribution and high biological diversity (<http://www.biodiversityhotspots.org/xp/Hotspots>). There is tremendous ecological diversity within the park including coastal dunes and marshes, grasslands, coastal sage and chaparral shrublands, oak woodlands, valley oak savannas, rocky outcrops, riparian woodlands, suburban and agricultural areas. Fifty species of mammals are found in the mountains including bobcat, mountain lions, mule deer, and badgers. In addition, nearly 400 species of birds, 35 species of reptiles and amphibians, and 1000 species and varieties of plants are known to occur.

The SMMNRA is 153,075 acres. It extends for 46 miles from Griffith Park in Los Angeles to Point Mugu State Park in Ventura County. An additional 69,099 acres are included beyond the recreation area's boundary and define the 220,000 acre Santa Monica Mountain Zone. The SMMNRA includes federal, state and local parklands as well as private property. Approximately 90% of the SMMNRA is still undeveloped with 22,610 acres of federal parkland, 35,059 acres of state parkland and 70,923 acres of private land. Approximately 70,000 people live within the national recreation area. Consequently, the SMMNRA includes a significant amount of urban-wildland interface where developed lands on the boundary and within the recreation area meet areas of undeveloped natural habitat. The patchwork of land ownership and development means that there are complex boundaries between parkland and private property and correspondingly complex fire management issues.

**Table 3-1 Current Park Ownership**

<b>OWNER</b>	<b>ACRES</b>	<b>PROTECTED PARKLAND</b>
National Park Service	22,610	22,610
Other Federal Land	936	
State Dept of Parks & Recreation	35,059	35,059
Mountains Recreation & Conservation Authority	7,712	7,712
Santa Monica Mountains Conservancy	5,079	5,079
University of CA Reserve	328	328
Los Angeles County Parkland	1,074	1,074
Other Los Angeles County Land	3,286	
City of Los Angeles Parkland	437	437
Other City of Los Angeles Land	1,998	
Conejo Open Space Foundation (COSCA)	0	
City of Thousand Oaks Parkland	36	36
City of Calabasas Parkland	245	245
Las Virgenes Municipal Water District	1,198	
Miscellaneous Public Land	254	
Other Private Land	70,923	
Mountains Restoration Trust	1,900	1,900
<b>Totals:</b>	<b>153,075</b>	<b>74,480</b>

In addition to the outstanding biological resources of the park, the cultural resources of the park are rich and varied. The Santa Monica Mountains are home to two of the largest Native American Indian groups in California, the Chumash and the Gabrielino/Tongva. Within the park boundaries there are over 1000 archeological sites, the earliest dating from 5000 BC. More recent cultural resources are associated with the emergence of the movie industry in the Los Angeles area which was dependent upon the easily accessible and varied topography of the Santa Monica Mountains.

No other national park features such a diverse assemblage of natural, cultural, scenic, and recreational resources within easy reach of so many people living in an urban center. More than 17 million people, approximately 6% of the nation's total, live within a one hour drive of the park. The proximity of these resources to the urban population of the Los Angeles area is especially significant because open space of such high quality is so rare in heavily developed southern California.

### ***Development Patterns***

During the late 1880's, the Santa Monica Mountains were recognized as a resort mecca because of their isolation and serenity. Recreation and sports clubs, non-profit organizations and churches all built retreats. Small lot subdivisions deep within the mountains were created in the 1920's,

and lots were given away as a promotion for subscribing to local papers and magazines. Large estates also began to appear in the 1920's and continue to be built today. As the motion picture industry brought fame to Southern California, "stars" moved to Santa Monica, Pacific Palisades, and Malibu, forming the nucleus of luxurious movie colonies.

In the 1980's, suburban development at the edge of the SMMNRA boundary grew at four times the rate of development in the rest of Los Angeles County. The proximity to the developed San Fernando Valley and the Westside, combined with scenic beauty and freedom from urban problems, made the area popular for suburban growth.

Over 2000 new single family residences, condominiums, and apartments were approved compared to the 1000 homes prescribed by the Los Angeles specific plan in use at the time. Several local municipalities incorporated during the development boon to gain more control over the rapid growth. Westlake Village (1981), Agoura Hills (1983), Calabasas (1991), and Malibu (1991) became independent cities. A *Los Angeles Times* investigative report published in 1998 found that homes in the new high-density developments were 2.4 times more likely to submit disaster relief claims, compared to homes built at the prescribed density (*Los Angeles Times*, 1998). The disasters included wildfires and floods during the 1990's and the 1994 Northridge earthquake.

In October, 2000, Los Angeles County adopted a new specific plan for the northern portion of the Santa Monica Mountains. New suburban-style development in and adjacent to the SMMNRA has mostly stopped, except for previously approved projects and the large 3,050-home Ahmanson Ranch project north of Calabasas in Ventura County. The majority of future development within the mountainous areas of the SMMNRA is expected to be single family residential homes.

## II Climate and Geological Setting

### *Geologic Setting*

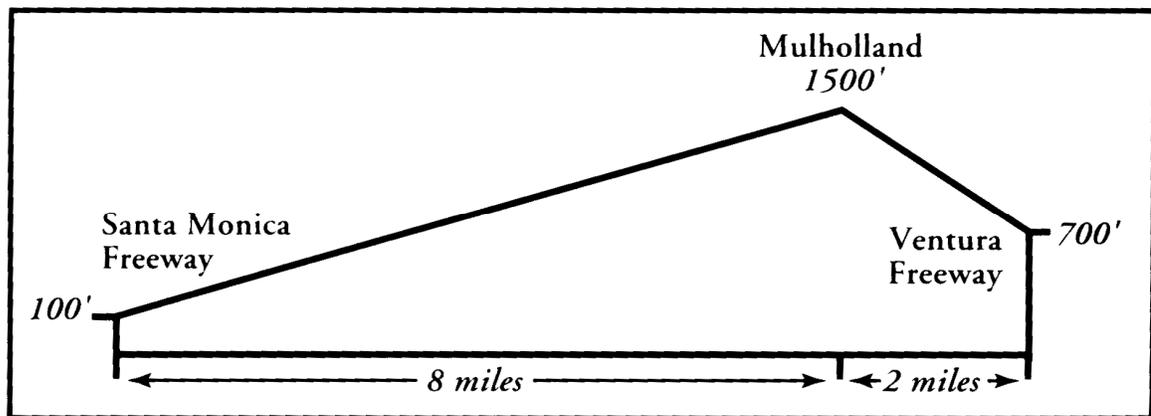
The Santa Monica Mountains, together with the four northern Channel Islands, are the southwesternmost of a series of east-west trending ranges that make up the Transverse Ranges of Southern California. They form a low range from 3 to 13 miles wide and extend from the Oxnard plain for approximately 45 miles eastward to the Los Angeles River. They are bordered by the Pacific Ocean and the Los Angeles basin on the south and the San Fernando Valley and the Simi Hills on the north. The range is bisected by Malibu Canyon, a deeply incised, antecedent drainage course that drains the north slopes of the Santa Monica Mountains and the southern slopes of the Simi Hills and discharges at Malibu Lagoon.

The Simi Hills parallel the Santa Monica Mountains on the north between the Oxnard plain and San Fernando Valley. They form a northeast trending ridge of approximately 15 miles in length at an average altitude of 2000 feet, eroded from resistant, thick bedded sandstone strata dipping north. They separate the San Fernando Valley on the southeast from the Simi Valley on the north, both at altitudes of 1200 feet.

The overall appearance of the Santa Monica Mountains is steep and rugged, with low valleys spaced intermittently along the north and south slopes. It includes coastal, valley, and mountain geomorphology. The western end of the mountains is igneous (extrusive volcanic). It shifts in the east to a sedimentary base, and the eastern end of the range contains metamorphic and older plutonic (intrusive) rocks. There are no natural lakes, but streams, springs, and seeps are common and widespread.

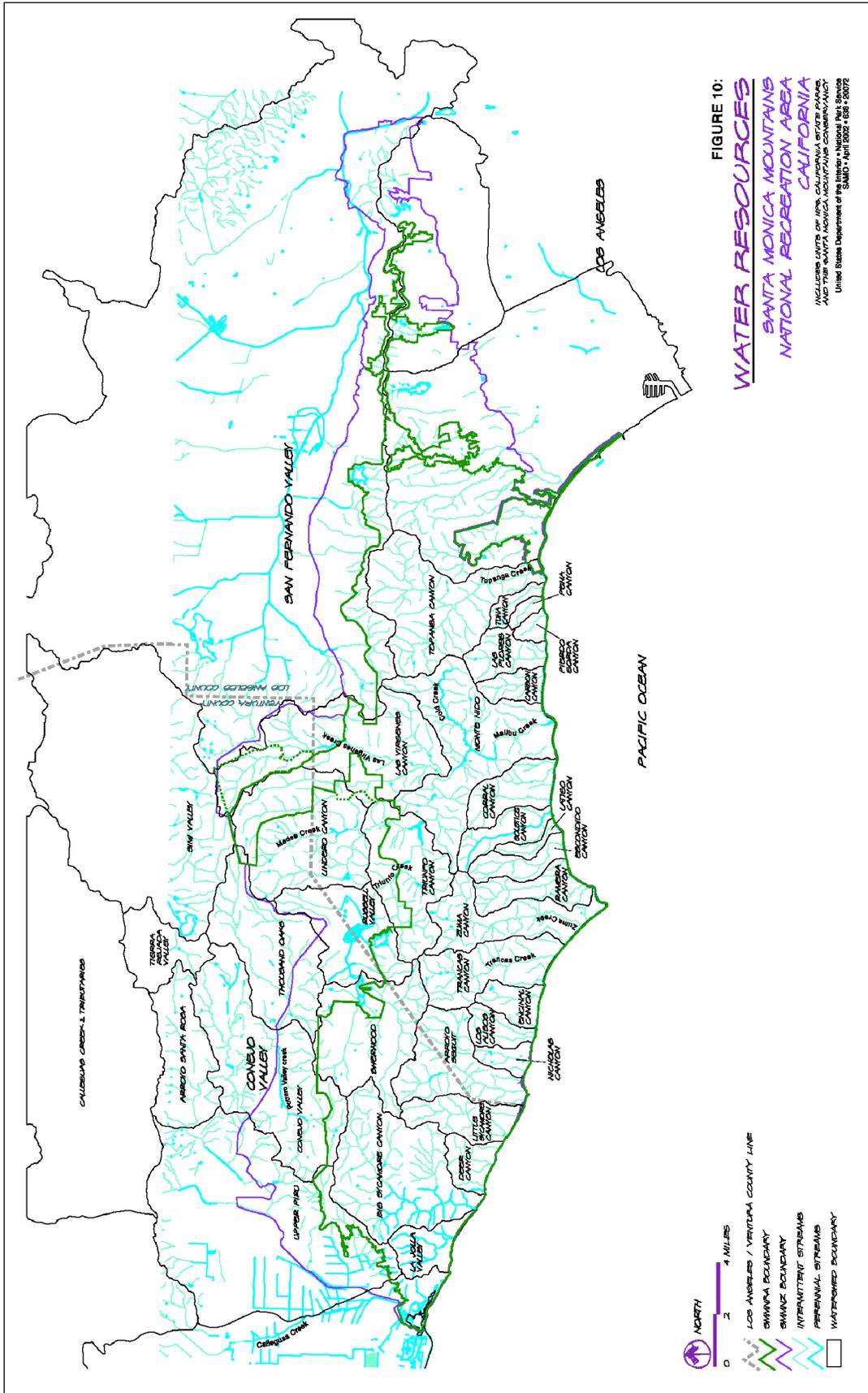
The elevation of the Santa Monica Mountains ranges from sea level to 3111 feet at Sandstone Peak, with a mean elevation of 1000 feet. The Santa Monica Mountains have a generally asymmetric profile (Figure 3-2) with long, V-shaped, deeply incised canyons that drain the south flank to sea level and short steep canyons on the north flank that descend to the higher base elevation of the San Fernando Valley and the Conejo Valley at about 1000 feet above sea level. The crest and the long ridges that extend southward from the crest are approximately 1500-2000 feet in elevation. Most of the summits along the crest are somewhat flattened, apparently remnants of an old Cenozoic erosion surface reduced to low relief prior to the latest series of uplift events (Dibblee, 1982). The steepest profile is situated near Griffith Park.

Figure 3-2 Profile of the Sepulveda Pass



The Santa Monica Mountain watersheds are illustrated in Figure 3-3, which shows the inland drainage area of the Malibu Creek watershed and the numerous, smaller south coastal slope watersheds.

Figure 3-3 Watersheds of the Santa Monica Mountains and Simi Hills



**FIGURE 10:**  
**WATER RESOURCES**  
**SANTA MONICA MOUNTAINS**  
**NATIONAL RECREATION AREA**  
**CALIFORNIA**

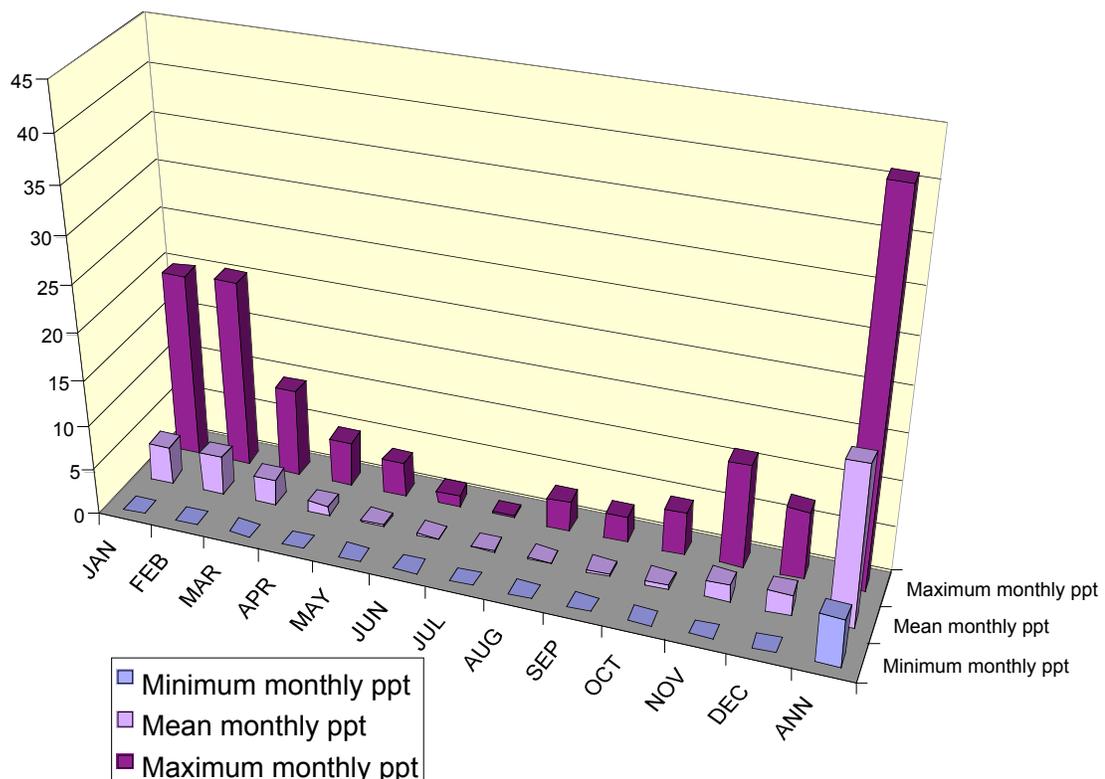
INCLUDES LANDS OF THE CALIFORNIA WATER RESOURCES AND THE SANTA MONICA MOUNTAIN CONSERVATION. United States Department of the Interior • National Park Service • SIMO • April 2002 • 1081 • 20072

## Rainfall

The SMMNRA has a Mediterranean-type climate. This climate type is characterized by mild, wet winters and hot, dry summers and occurs in only five locations throughout the world including parts of California, along the Mediterranean Sea, central Chile, parts of southwestern Western and South Australia, and the southwestern Cape region of South Africa.

On average, 86% of the Santa Monica Mountains rainfall occurs between November and March, with the majority (47%), concentrated in January and February from large storms that last for several days (Table 3-2, Figure 3-4). The dry season is considered to be from May-October. Virtually no significant rainfall (1%) occurs in June, July, or August. Evaporation exceeds precipitation from April to November (Keeley, 2000). The most significant feature of the regional rainfall pattern in addition to its unusual seasonal distribution, is its high degree of variability and unpredictability. Long periods may occur between storms in a single season and enormous variation exists among total rainfall amounts between years. At the UCLA weather station, the lowest rainfall year (1990, 5.26") is approximately 1/3 the normal annual mean of 17", while the highest rainfall year (1984, 41") is almost 2 1/2 times the normal annual mean (Figure 3-4). Multiple years of low rainfall and extended drought punctuated by moderate to extremely wet years are not uncommon (Major, 1977). Within the SMMNRA additional variation in rainfall pattern occurs with respect to geographic location. While mean annual precipitation at the base of the Santa Monica Mountains in west Los Angeles is 17.4"/year, it can be as much as 24-26"/year around the higher peaks (Huffman, 1998).

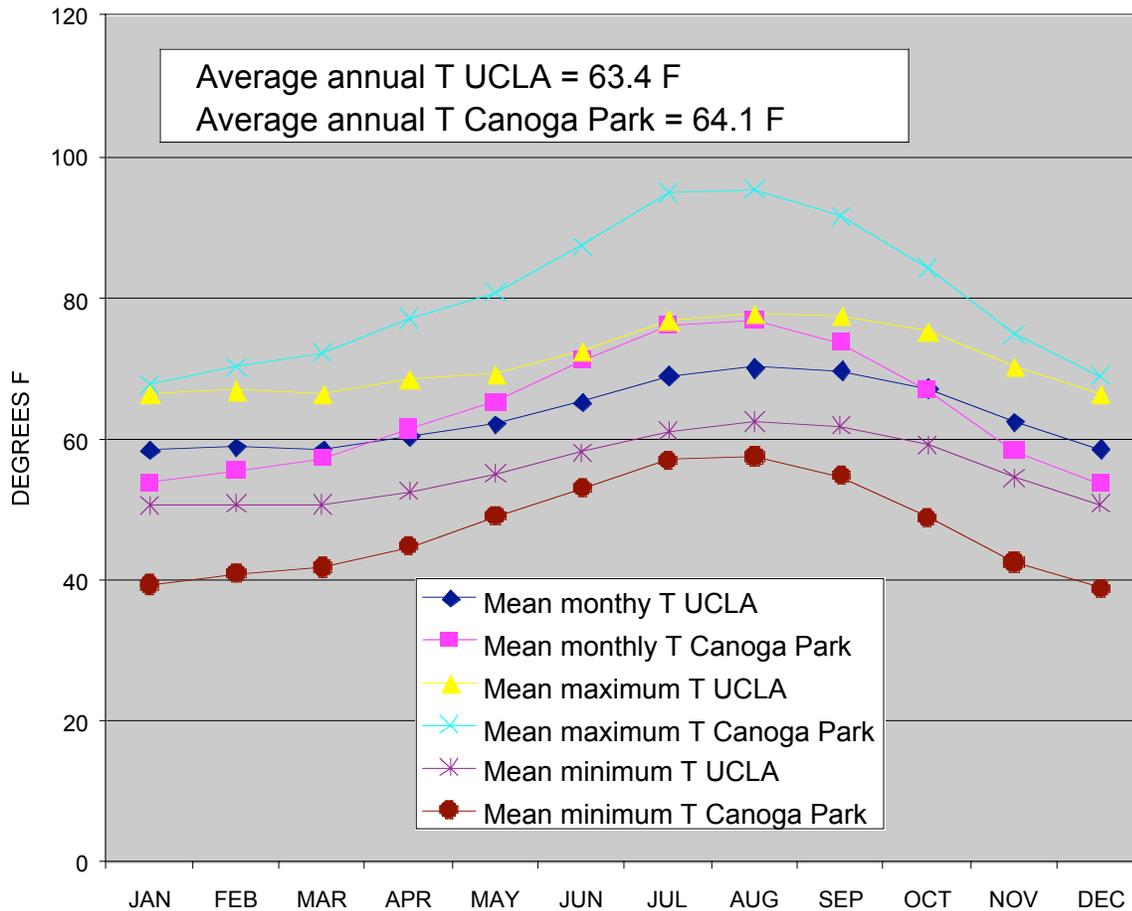
Figure 3-4 Annual Rainfall Patterns in the Santa Monica Mountains



## Temperature

December-March are the coolest months and July-October the hottest months in the Santa Monica Mountains. Along the immediate coast both winter and summer temperature extremes are moderated, but as one moves inland to the interior canyons and valleys, temperatures become higher in summer and lower in winter. Mean monthly maximum summer temperatures can vary 15-20°F between UCLA at the base of the mountains on the coastal side and Canoga Park on the inland valley side (Raven et al, 1986, Figure 3-5). Winter nighttime temperatures average 10°C colder 4 km inland from the immediate coast (Boorse et al, 1998). Coastal sites rarely freeze, while inland sites often experience freezing between December-February in the range of -8°C to 12°C (Boorse et al, 1998). The frequency and duration of freezing events in the Santa Monica Mountains has been shown to affect chaparral species distributions and plant dieback (Boorse et al, 1998 and Langan et al, 1997).

Figure 3-5 Temperature Variation in the Santa Monica Mountains



**Table 3-2 Annual Temperature and Rainfall Patterns for the Santa Monica Mountains**  
(UCLA, California)

Temperatures 1961-1990 (0F)	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN
Mean monthly T	58.4	58.9	58.5	60.4	62.1	65.2	69	70.1	69.7	67.2	62.4	58.6	63.4
Mean maximum T	66.2	66.9	66.4	68.4	69.1	72.3	76.8	77.8	77.4	75.2	70.3	66.2	71.1
Mean minimum T	50.5	50.8	50.6	52.5	55	58	61.1	62.4	61.8	59.1	54.5	50.8	55.6
Precipitation 1948- 2001 (inches)	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN
Mean monthly ppt	4.02	4.22	2.78	1.15	0.26	0.08	0.02	0.11	0.23	0.41	1.86	2.29	17.54
Max. monthly ppt	20.11	20.51	9.52	4.86	3.7	1.29	0.25	3.23	2.81	4.76	11.3	7.46	41.09
Min. monthly ppt	0	0	0	0	0	0	0	0	0	0	0	0	5.26

Data from Western Regional Climate Center [wrcc@dri.edu](mailto:wrcc@dri.edu)

## Wind

Wind speeds vary in intensity and duration throughout the year within and adjacent to the Santa Monica Mountains. During summer days airflow is generally directed inland from the west, southwest, south, and southeast. At night, airflow patterns reverse and travel toward the ocean. The Santa Monica Mountains periodically experience extreme foehn-type winds locally called Santa Ana winds. These winds result from a regional, large scale weather pattern caused by the atmospheric pressure differential between a Great Basin high-pressure cell and a Pacific Coast trough of low pressure. Santa Ana winds average 20-30 mph and maximum gusts over 100 mph have been recorded. In the Santa Monica Mountains these winds are funneled through the north-south canyons and are therefore predominantly north or northeasterly winds.

Santa Ana winds have been identified as the primary driver of the wildfire regime in southern and central California shrublands (Keeley and Fotheringham, 2000; Moritz, 1997). Although Santa Ana winds can occur in any month, they predominate from September to December (Table 3-3). The major fires in the Santa Monica Mountains coincide with this peak of Santa Ana activity when vegetation is dry and temperatures high (Figure 3-6). A second small peak of Santa Ana wind activity occurs in March, but this is usually a time of cool temperatures and high moisture and does not create the severe fire conditions that occur during the fall Santa Ana winds.

**Table 3-3 Santa Ana Wind Frequency and Duration by Month for the Angeles National Forest 1951-1960**

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Average number of Santa Ana days per month	0.7	1	1.7	0.8	0.7	0.4	0.2	0	1.1	1.9	2.6	1.8
Average duration in days	1.7	1.9	2.5	1.8	1.4	4.5	2.5	0	4.4	4.5	5	3.7
Total number of Santa Ana days in month	1.2	1.9	4.3	1.5	1	1.8	0.5	0	4.8	8.6	13	6.6

Data from Biswell, Harold. 1989. *Prescribed Burning in California Wildlands Vegetation Management*, UC Press, Berkeley and Los Angeles, CA.

## Fog

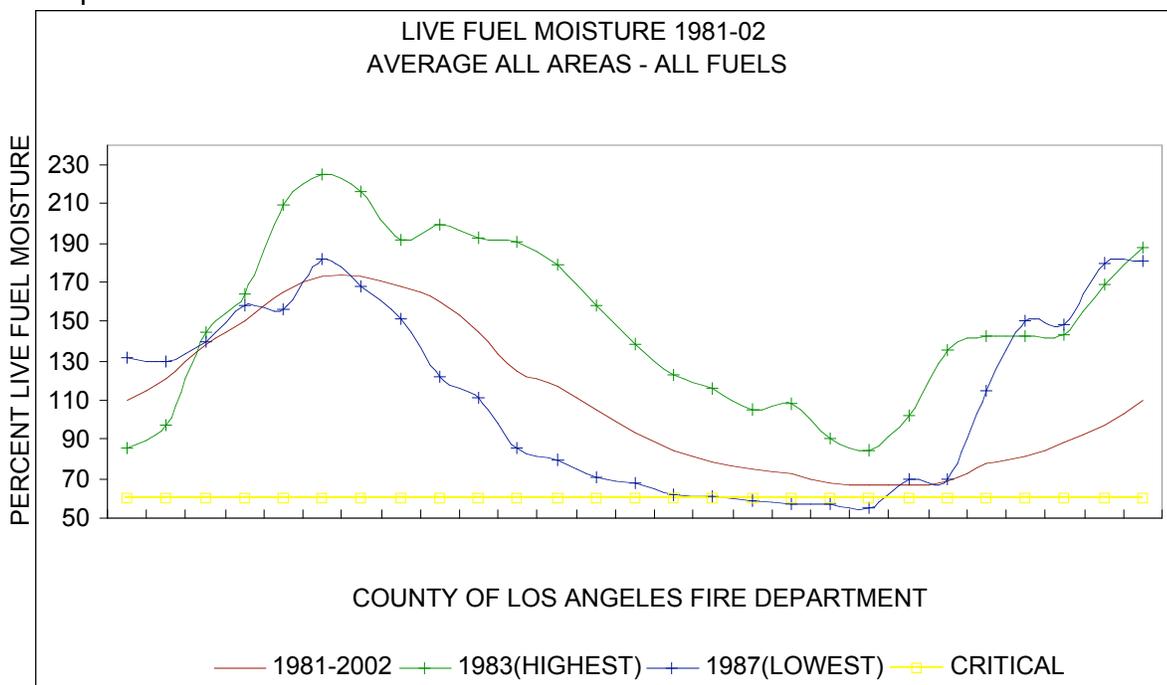
During the summer, a marine layer of fog is common along the coast during the morning hours, but dissipates by early afternoon. Early in the morning inland valleys may be fog-shrouded, but as temperatures increase, the fog dissipates until it crests the mountains and is vaporized or pushed out to sea. The coastal climate zone is classified as Mediterranean cool summer with fog in the Köppen system of climate classification, defined as areas with more than 30 days per year of dense fog. Inland of the coastal fog belt the climate is Mediterranean warm summer where the average temperature of the warmest month exceeds 71.6° F (22° C).

## Climate effects on fuel moisture

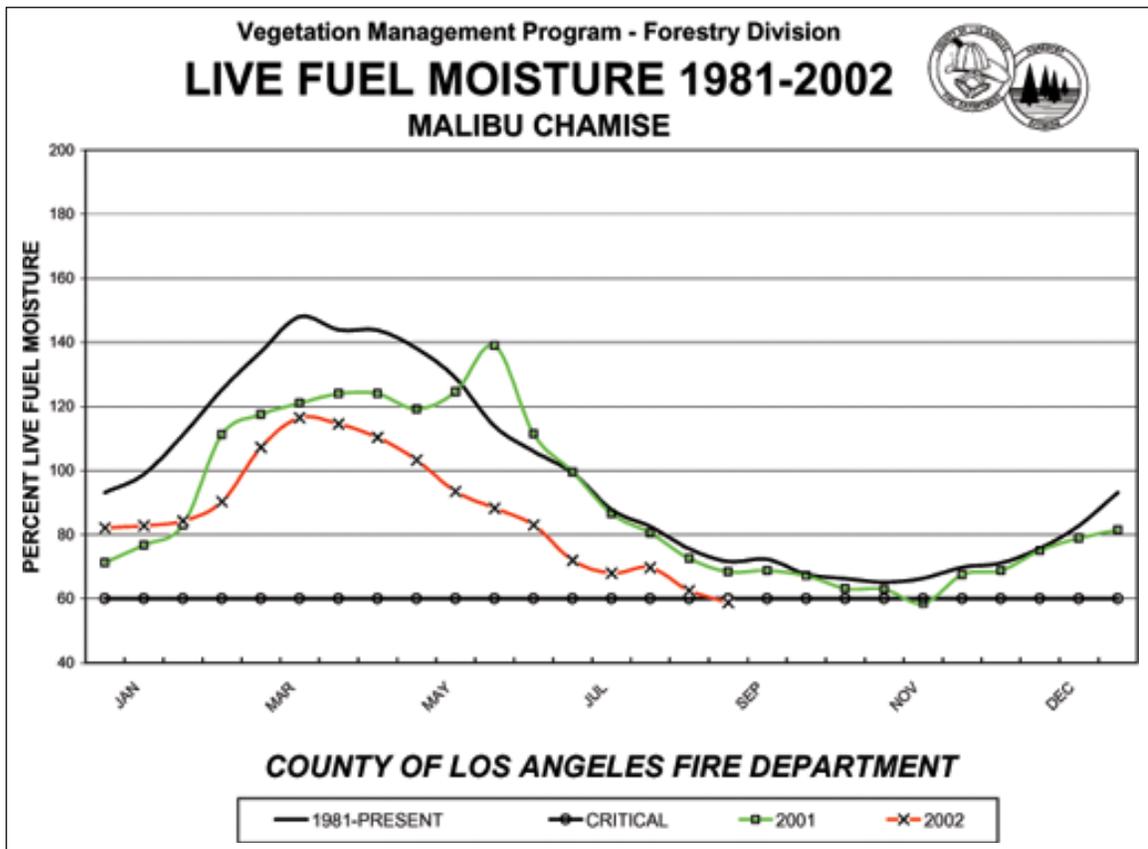
Live fuel moisture content is monitored by the Los Angeles County Fire Department as an indicator of the severity of the fire hazard. Sixty percent live fuel moisture is considered to be the critical point at which fire behavior in live fuels becomes the same as that observed in dead fuels, i.e., cellular moisture no longer significantly retards the heat transfer process. When rainfall is limited or occurs early in the season, the length of time during which vegetation is in a critical fuel condition is greatly extended (Figure 3-6). In high rainfall years, average fuel moisture never reaches the critical fuel moisture levels. In coastal Malibu, in most years, vegetation does not reach critical moisture levels. The 2002 season is a notable example of record low levels of live fuel moisture due to both the low amount of total rainfall and the absence of rainfall in the second half of the rainy season (Figure 3-6B).

Figure 3-6 Live Fuel Moisture Levels 1981-2002

Graph A



Graph B



### III Fire Environment

The fire environment is the current fire regime based on fire history data from the 20th century. It includes analysis of fire type, seasonality of fire, ignition sources, fire intensity, fire frequency, fire return interval, and fire size.

#### *Fire Type*

Fires are typically either crown fires in shrubland vegetation types such as chaparral and coastal sage scrub or surface fires in grassland and oak savanna communities. Type converted shrublands with native shrubs growing in a non-native annual grassland matrix will experience cooler surface fires compared to high intensity canopy fires seen in normal shrublands.

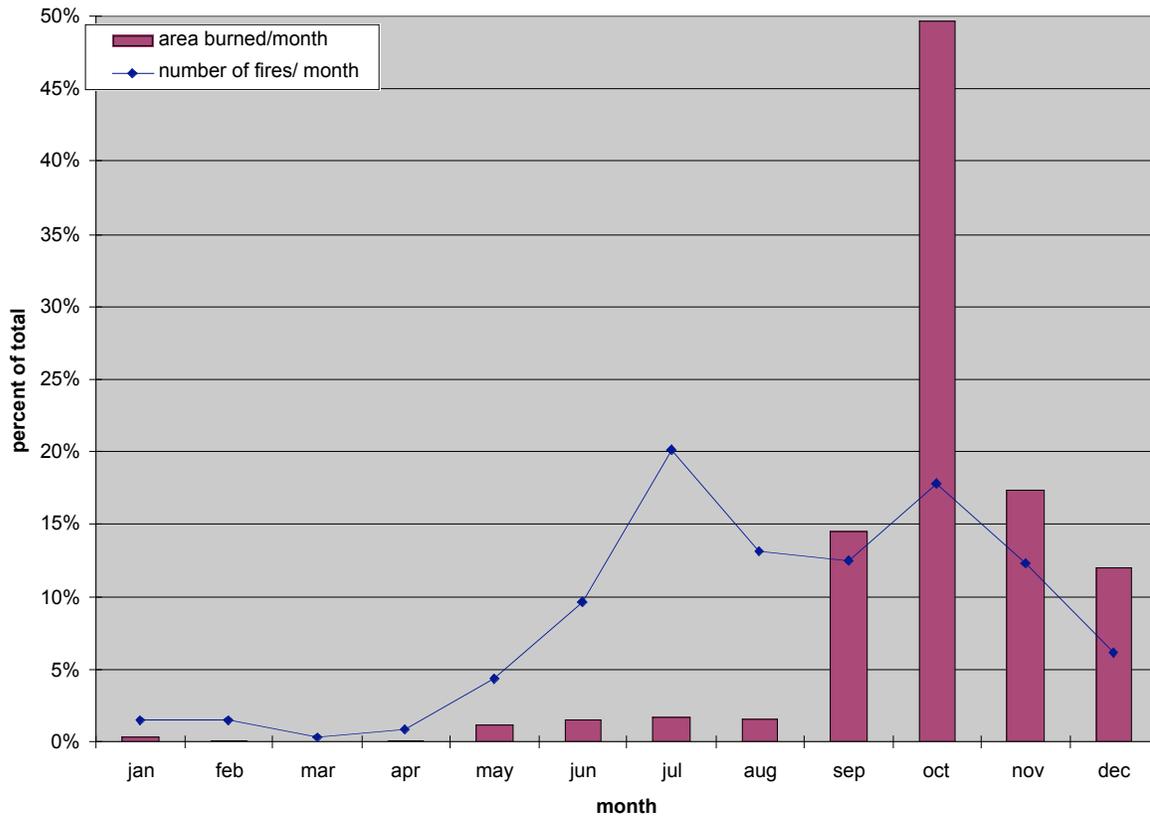
#### *Rate of Spread*

The rate of fire spread is determined by wind speed, topography (slope) and fuels. The largest and most destructive wildfires spread at extremely rapid rates which overwhelm the ability of firefighters to control them. The 1993 Old Topanga Fire, which started at 10:45 at the top of the Topanga watershed in the Old Topanga Canyon drainage, reached the Pacific Ocean at Sweetwater Canyon in 4 ¼ hours, ending by 3:00 pm. The 1978 Kanan fire crossed 13 miles to reach the coast in 2 hours (Davis, 1999).

#### *Seasonality*

Large fires account for the vast majority of the total area burned in the Santa Monica Mountains. Half of the area burned in the Santa Monica Mountains since 1925 burned in the month of October, while ninety percent burned between September and December (Figure 3-7). Although most of the area burned occurs in fall fires, there are a greater number of fires in the summer (Figure 3-7). The seasonal discrepancy is caused because large fires occur exclusively during extreme fire weather conditions of high temperatures, low humidity, and high winds, when wildfires spread rapidly and are highly resistant to control. Santa Ana winds, which are primary drivers of extreme fire weather in southern California, occur mostly in the fall.

Figure 3-7 Fire Frequency and Total Area Burned Per Month 1925-2000



### Ignition sources

Analysis of all recorded fire starts in the Santa Monica Mountains from 1981-2003 shows that fire is overwhelmingly anthropogenic in origin. Of 161 recorded fire starts in 22 years, 96% were caused by human activity. Only six fires were ignited by lightning in two clusters of fire ignitions in 1984 and 1998. Lightning ignited fires burned less than .4% of the total area burned between 1981 and 2003. The largest lightning ignited fire burned 600 acres, while the others were .1-.2 acres in size. The two clusters of lightning starts were part of single weather events, the first of which occurred in June, 1984 and the other which occurred in early September, 1998 (Tables 3-4a, b).

The two major causes of fires that have burned large amounts of acreage in individual fires are arson and arcing power lines (Table 3-4a). Ninety percent of the total area burned in this time period has been started by arson (78%) and arcing power lines (12.5%). These types of ignitions generally occur under windy Santa Ana conditions when fires spread rapidly and control is difficult.

Fully one third of fire starts (4.9% of total area burned) are classified as unknown in origin. Eleven percent of fires (3.7% of total area burned) have been intentionally set as prescribed fires. The next most frequent causes of fires are arson, vehicle fires, powerlines, campfires or cooking

fires, children lighting matches, mechanical/equipment, fireworks, lightning, dump/brush burning, and warming fires (Table 3-4b). Of these, only arson, power lines, lightning and three fires with unknown causes have ignited fires larger than 500 acres in size (the unknown starts burned 600, 2000, and 3700 acres). The vast majority of unintentionally started fires have been very small in size, between 0.1-10 acres (76%). The frequency of the larger size classes of fires from unintentional fire starts is: 11-100 acres (14%), 100-10,000 acres (7%), and >10,000 acres (3%). Several causes of frequent fire starts (5 or >) that have not caused any major fires (> 50 acres) for this time period are campfires, dump/brush pile burning, mechanical/equipment, and warming fires.

**Table 3-4a Causes of Fire in the Santa Monica Mountains National Recreation Area 1981-2003 Ordered by Total Area Burned (acres)**

Ignition Source of Fires	Number Area	Total Area	Mean Size	Maximum Range	Size
Arson	16	118,655.3	7,416.0	57,000.0	.1-57,000
Power line	10	18,980.9	1,898.1	13,190.0	.1-13,190
Unknown	50	7,378.1	147.6	3,700.0	.1-3,700
Resource burn	18	5,601.0	311.2	1,552.0	8-1,552
Lightning <sup>1</sup>	6	600.7	100.1	600.0	.1-600
Fireworks	7	279.1	39.9	278.0	.1-278
Children matches	8	112.9	14.1	80.0	.1-80
Vehicle	11	65.3	5.9	60.0	.1-60
Trash fire	2	20.2	10.1	20.0	.2-20
Aircraft fire	1	18.0	18.0	18.0	18.0
Warming fire	5	16.4	3.3	15.0	.1-15
Mechanical/equipment	7	12.6	1.8	5.0	.1-5
Camp/cooking fire	9	10.6	1.2	5.0	.1-5
Smoking	3	10.2	3.4	10.0	.1-10
Dump/brush pile burning	5	1.5	0.3	1.0	.1-1
Signal fire	1	1.0	1.0	1.0	1.0
Electrical short	1	0.1	0.1	0.1	0.1
Holdover	1	0.1	0.1	0.1	0.1
<b>Total</b>	<b>161</b>	<b>151,764</b>			

<sup>1</sup> Two clusters of lightning events in 1984 and 1998

**Table 3-4b Causes of Fire in the Santa Monica Mountains National Recreation Area 1981-2003  
Ordered by Fire Frequency**

Ignition Source of Fires	Number Area	Total Area	Mean Size	Maximum Range	Size
Unknown	50	7,378.1	147.6	3,700.0	.1-3,700
Resource burn	18	5,601.0	311.2	1,552.0	8-1,552
Arson	16	118,655.3	7,416.0	57,000.0	.1-57,000
Vehicle	11	65.3	5.9	60.0	.1-60
Power line	10	18,980.9	1,898.1	13,190.0	.1-13,190
Camp/cooking fire	9	10.6	1.2	5.0	.1-5
Children matches	8	112.9	14.1	80.0	.1-80
Mechanical/equipment	7	12.6	1.8	5.0	.1-5
Fireworks	7	279.1	39.9	278.0	.1-278
Lightning <sup>1</sup>	6	600.7	100.1	600.0	.1-600
Dump/brush pile burning	5	1.5	0.3	1.0	.1-1
Warming fire	5	16.4	3.3	15.0	.1-15
Smoking	3	10.2	3.4	10.0	.1-10
Trash fire	2	20.2	10.1	20.0	.2-20
Aircraft fire	1	18.0	18.0	18.0	18.0
Signal fire	1	1.0	1.0	1.0	1.0
Electrical short	1	0.1	0.1	0.1	0.1
Holdover	1	0.1	0.1	0.1	0.1
<b>Total</b>	<b>161</b>	<b>151,764</b>			

<sup>1</sup> Two clusters of lightning events in 1984 and 1998

## Fire Size

Summary statistics on fire size for the Santa Monica Mountains are presented in Table 3-5. The cumulative area burned is shown in Figure 3-8 and the size of individual fires and the year in which they burned is shown in Figure 3-9. The fire size distribution most closely fits a tapered Pareto distribution (Schoenberg, F.P., et al, 2002). Large fires account for the majority of the total area burned in the Santa Monica Mountains: the largest 1% of fires have burned 25% of the total burned area, the largest 5% have burned 71% of the total burned area, and the largest 10% have burned 86% of the total burned area (Table 3-5 and Figure 3-8).

Because the fire size distribution is so strongly skewed, calculating an average fire size has no meaning, i.e. it does not represent a “typical” fire size. The median fire size is 76 acres, i.e. half the fires are smaller and half the fires are larger (Table 3-5). Although the size distribution has remained largely stable over time, the trend in average fire size has declined very slightly from 1925 to the present (Figure 3-9; Schoenberg, F.P., et al, 2002).

**Table 3-5 Summary Fire Statistics of the Santa Monica Mountains 1925-2001**

Total area burned (acres)	569,474.2	
Total number fires recorded	368.0	
Mean fire size (acres) <sup>1</sup>	1,547.5	
Median fire size (acres)	76.3	
Min fire size recorded (acres)	0.3	
Max fire size recorded (acres)	43,043.1	
Area burned in largest 1% (n=4)	144,934.8	(25% of total)
Area burned in largest 5% (n=18)	402,189.3	(71% of total)
Area burned in largest 10% (n=37)	491,852.3	(86% of total)
Area burned in largest 25% (n=93)	550,902.4	(97% of total)

<sup>1</sup>See text for qualification

Table 3-6 The 12 Largest Fires in the Santa Monica Mountains 1925-2000

YEAR	NAME	AREA (ACRES)
1982	Dayton Canyon	43,043.1
1993	Green Meadow	38,478.8
1956	Sherwood/ Zuma	35,217.5
1970	Wright	28,195.4
1935	Malibu	28,191.9
1978	Kanan	25,565.3
1970	Clampitt	24,650.4
1967	Devonshire-Parker	23,005.3
1949	Simi Hills	20,573.0
1930	Potrero No. 42	20,391.5
1958	(name unknown)	18,115.8
1993	Old Topanga Fire	16,462.5

Figure 3-8 Cumulative Total Area Burned 1925-2000

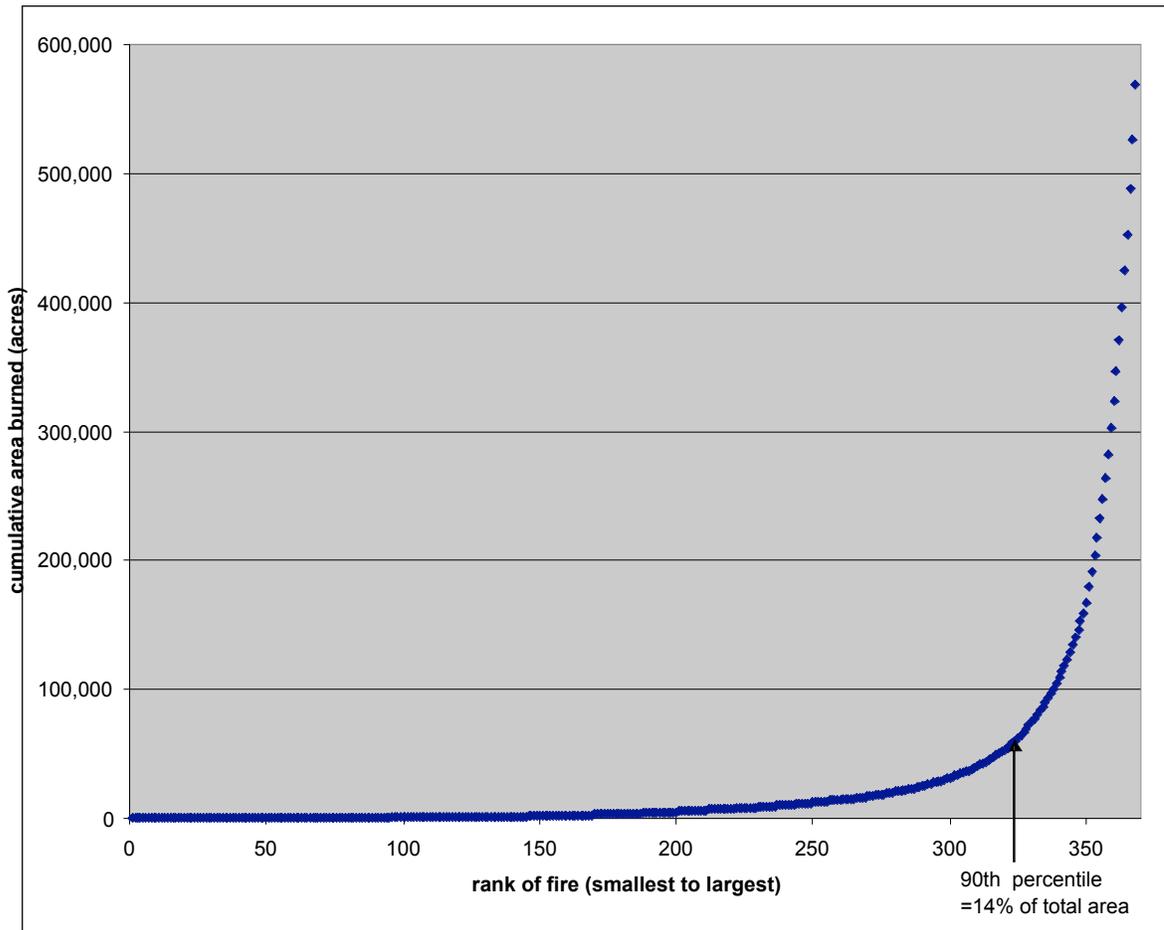
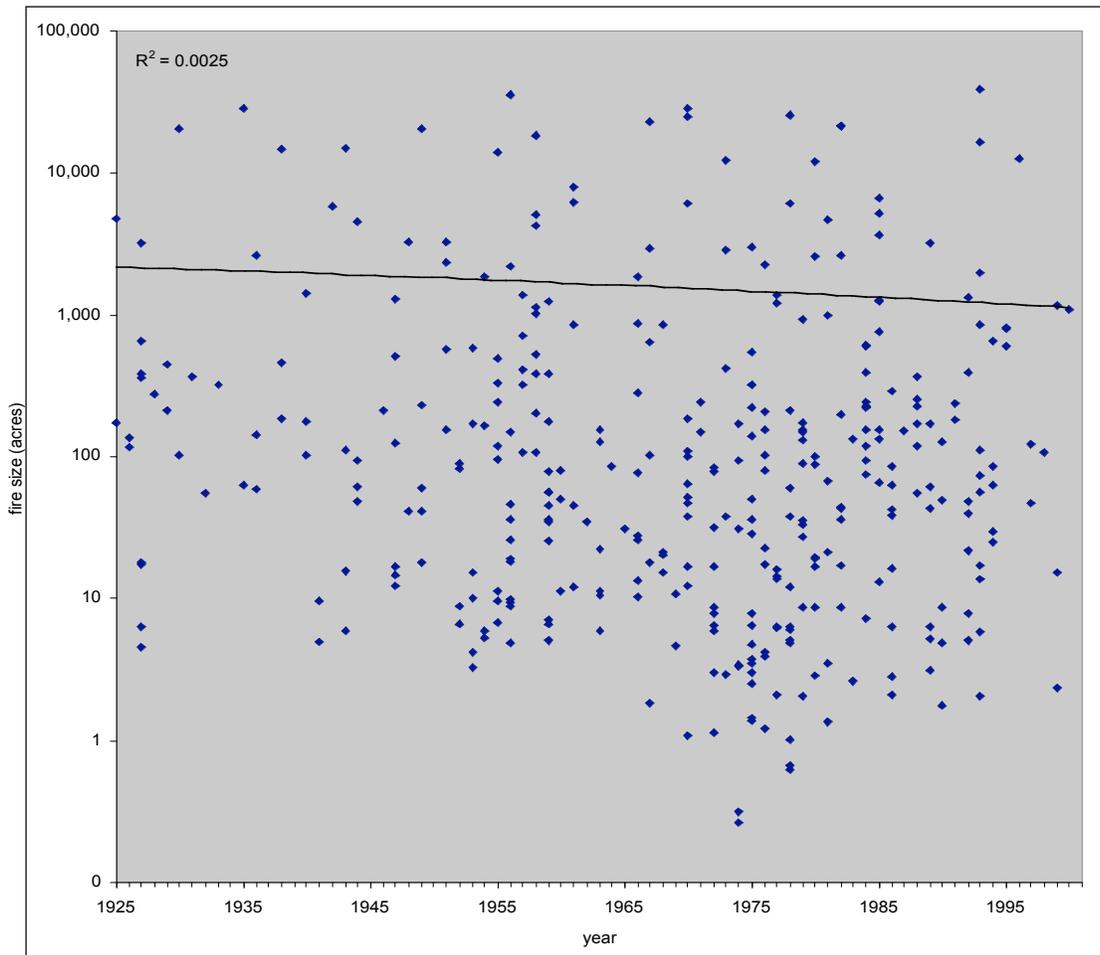


Figure 3-9 Size and Year of All Fires Recorded in the Santa Monica Mountains 1925-2000



## *Fire Intensity and Fire Severity*

### Fire Intensity

Fire intensity is the rate at which a fire produces thermal energy. It depends on the ratio live:dead fuels, fuel loading (wt/unit area), fuel density (wt/unit fuel volume), fuel surface:volume ratio (amount of fine fuels), packing ratio (fuel volume: fuel bed ratio), fuel bed porosity (spacing shrubs), fuel moisture, amount of volatile secondary compounds (ether extractives), temperature, and wind patterns.

Fire intensity can be expressed in a number of ways including radiant intensity, convective intensity, total fire intensity, reaction fire intensity, and fireline intensity (DeBano et al, 1998).

Fireline intensity, one of the most commonly used measures of fire intensity, is defined as the product of the available heat of combustion per unit surface area and the rate of spread of fire. It is roughly related to flame length as

$$I = 300 h^2$$

where, I = fireline intensity (kW/m) and h = flame height (m).

The range of fireline intensities in the Santa Monica Mountains can vary by 3 orders of magnitude, from  $1.08 \times 10^2$  kW/m in grassland prescribed burns with flame heights of 0.6m (2 feet) to  $2.7 \times 10^5$  kW/m in chaparral fires where flame lengths of 30 m (90 feet) were observed in the Old Topanga Fire (LA County, 1993).

### Fire Severity

Fire severity is a measure of fire's effects on ecosystem properties including vegetation, soils, geology, water, wildlife, and society. Fire severity depends on the nature of the fuels available for burning, and fire behavior when these fuels are burned. Surface measurements of fire intensity may be poorly correlated with fire effects on ecosystem processes because several other factors may strongly influence fire duration, duff consumption and relative amounts of subsurface heating. Because one can rarely measure the actual energy release of a fire, the term fire intensity has relatively limited practical application. Resource managers are primarily interested in evaluating ecosystem responses to fire, thus measures of fire severity are the focus of most fire effects monitoring.

Because fire affects a variety of ecosystem components in complicated ways, fire severity cannot be expressed as a single quantitative measurement that relates to resource impact. Therefore relative magnitudes of fire impacts measured by a variety of resource and site-specific means are generally placed into broadly defined, discrete, nominal or ordinal classes of low, medium and high fire severity.

Several methods of assessing fire severity from ground-based measurements have been used on recent fires in southern California. Intense fires with long residence time generally consume available fuels more completely than less intense fires with shorter residence time. Keeley (1998) monitored fire severity of the 1993 fires on 90 sites in southern California. He employed two vegetation-based indices of fire severity based on measurements of unburned skeletons of shrubs. The first index was based on the diameter of the smallest remaining unburned twigs on

shrub skeletons. The second index was based on the height above ground level of unburned twigs on shrub skeletons. These measures correlated with vegetation recovery at one year post-fire.

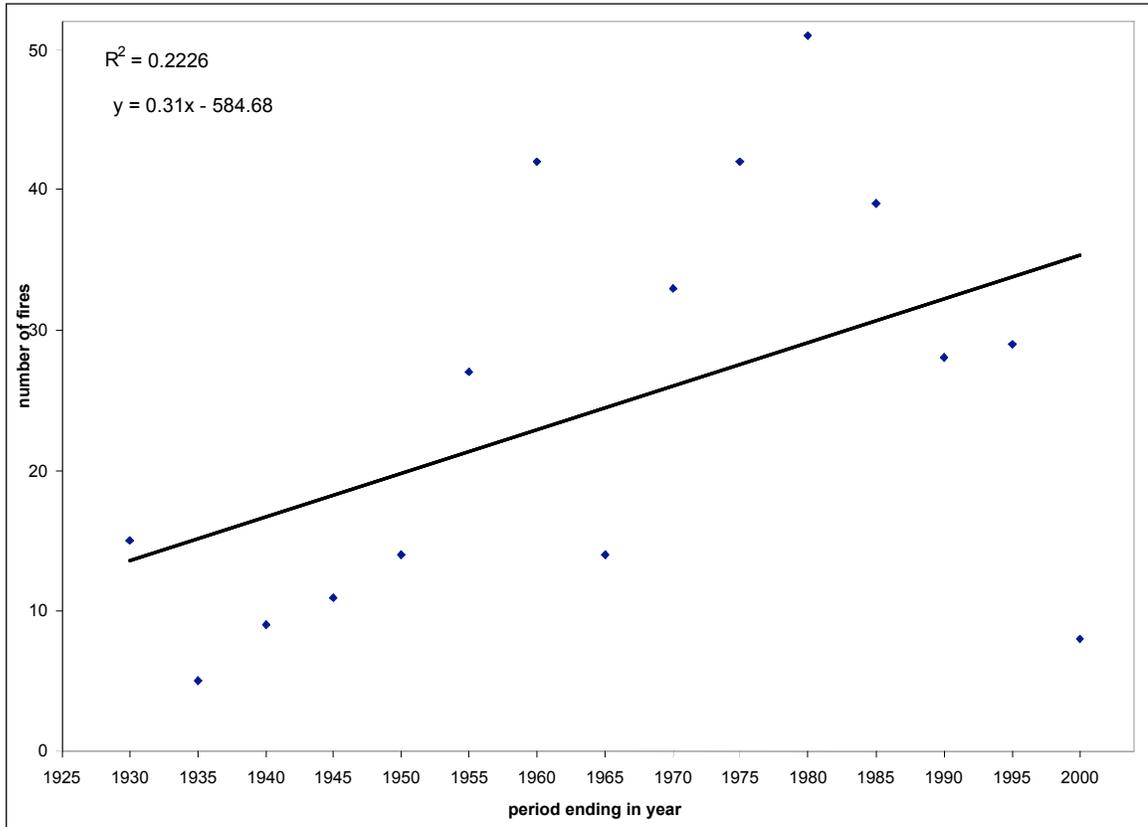
Intense fires and fires with long residence time often produce white ash while less intense fires and fires with short residence time often produce black ash. Relative amounts of black and white ash are often cited in fire reports as evidence of relative fire intensity in different areas. For example, an analysis of the 1996 Calabasas Fire (Radkte, 1996) referred to ash color while noting that grasslands burned with low intensity, 3-year old chaparral burned very lightly, 26-year old chaparral burned with greater fire intensity, while 14-year old chaparral burned with moderate intensity.

Remote sensing applications are increasingly promising sources of information about fire severity. Changes in vegetative cover, exposed soil, and relative amounts of different colored ash are readily discernable by aerial and space-based sensors. Recently fire severity and vegetation response after fires have been measured through multi-temporal analysis of AVIRIS imagery (Riano et al. 2002) and LANDSAT thematic mapper imagery (US Geological Service. 2002). When calibrated with georeferenced data from ground-based measures of fire severity, fire severity indices derived from remote sensing data may provide thematically accurate, high resolution, spatially explicit landscape scale characterizations of fire severity. Ongoing work at SMMNRA and on other public lands seeks to calibrate fire severity indices based on remote sensing data with ground-based data such as that collected by Keeley (1998a) to produce increasingly accurate and ecologically meaningful characterizations of fire effects on natural resources.

### *Fire Frequency and Fire Return Interval*

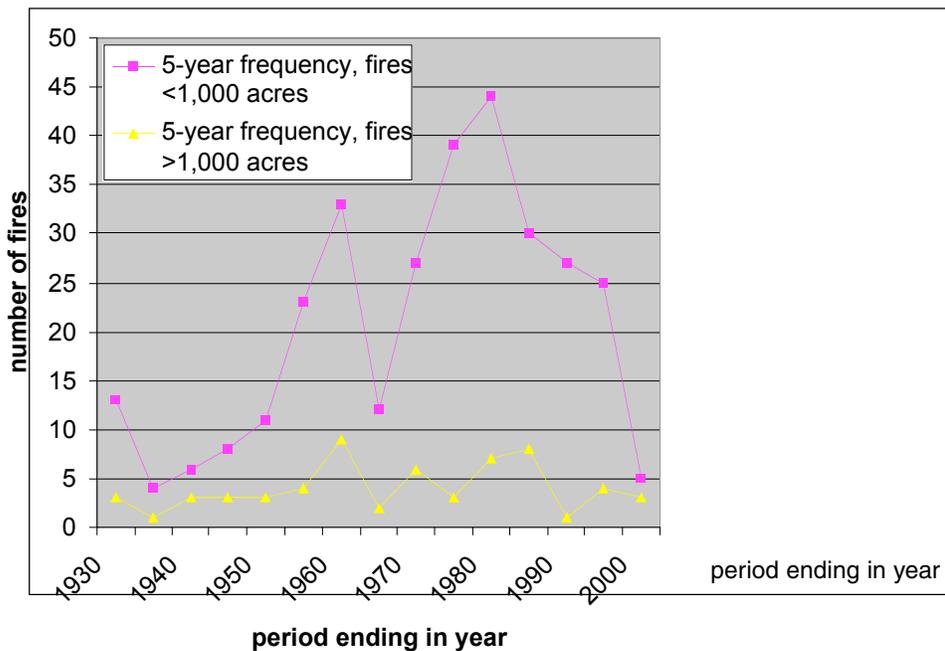
Fire frequency is the number of fires within a given area in a specific period of time; the fire return interval is the period of time between fires within a given area in a specific period of time. Fire frequency, the number of fires, has increased in the Santa Monica Mountains over the last 75 years (Figure 3-10). The total area burned per decade has also generally increased (Figure 3-12). Both statistics have shown a short term downward trend over the last decade, but the long term trend has been up for both measures. Fire frequency seems to show a cyclical pattern, with peaks around 1960 and 1980.

Figure 3-10 Fire Frequency by Five Year Periods



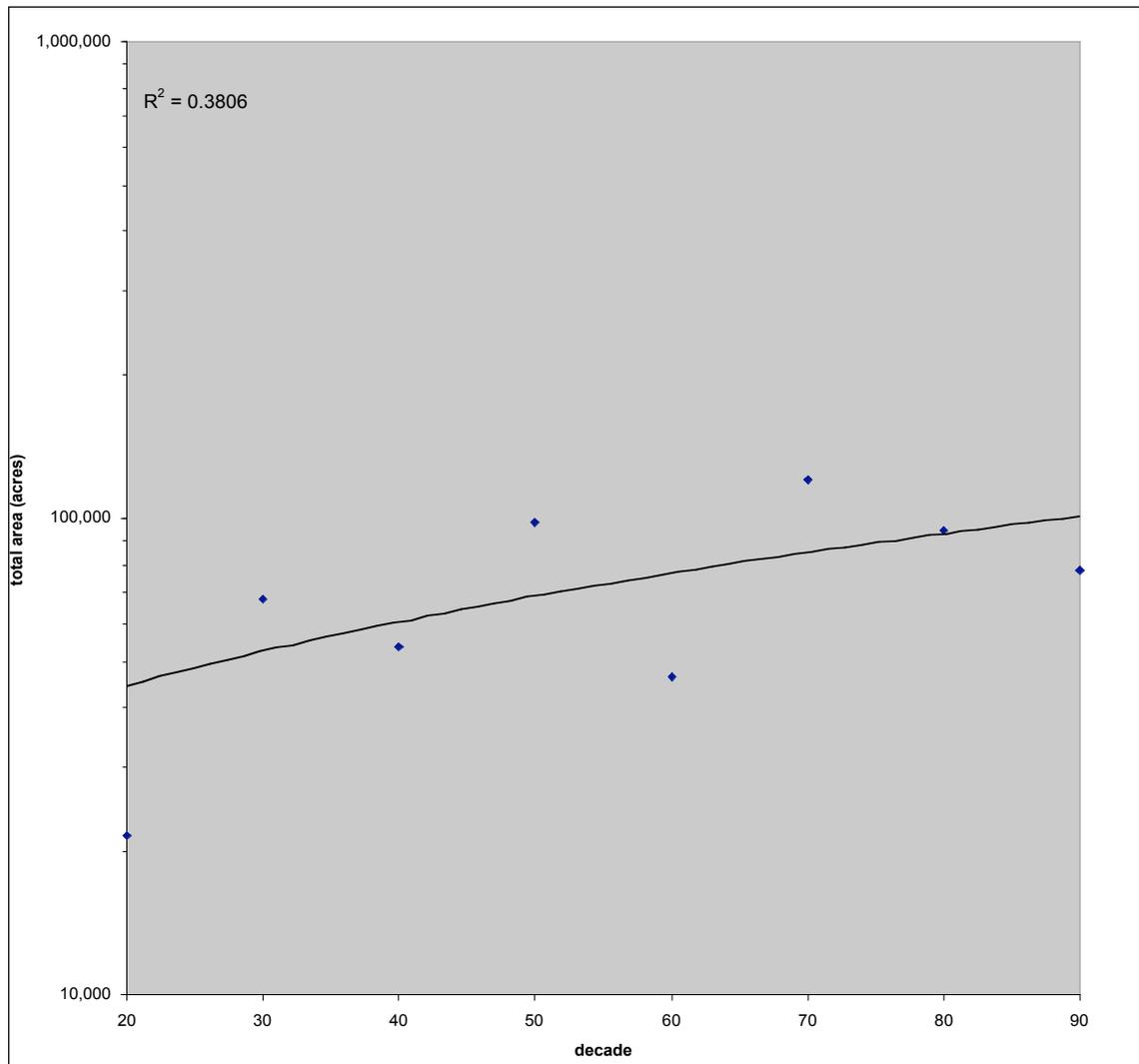
The frequency of small fires (area < 1,000 acres) has shown much greater change than the frequency of large fires (area > 1,000 acres) (Figure 3-11). The frequency of small fires hit a peak around 1980 and has dropped steadily since then.

Figure 3-11 Frequency of Large and Small Fires



The total area burned per decade has increased over the last 75 years (Figure 3-12). Because large fires make up the vast majority of all area burned, this measure is largely controlled by the frequency of large fires.

Figure 3-12 Total Area Burned by Decade



The average interfire interval for all natural areas in the Santa Monica Mountains from 1925 to 2001 is 32 years. This statistic expresses the average time between fires for any set of randomly determined locations in the area. The fire return interval at any particular location within the Santa Monica Mountains is widely variable because there are high fire frequency areas that have burned numerous times in the 76 years of record keeping and areas that have never burned in that period (Figure 3-13). This creates a complex mosaic of fire history across the landscape.

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fuel moisture (precipitation) have a more pronounced effect on burn area. Temperature effects appear to be constant above the threshold value of 21°C and burn area does not seem to be affected by either fuel moisture or precipitation (Schoenberg, F.P., et al, 2003).

It has been found that in the largest fires in chaparral shrublands (> 4000 ha), Santa Ana wind conditions are tightly coupled to the magnitude of the fire (Moritz, 1997). Below 4000 ha, wild-fire size is not as tightly coupled to Santa Ana wind conditions, possibly due to the ability to better control fire spread under less extreme conditions, or because other environmental factors interact to affect fire behavior and suppression effectiveness.

Keeley has examined the influence of antecedent weather conditions on fire frequency and fire size (Keeley, 2002) in southern and central California. He found a weak positive correlation with the number of fires, but not the amount of area burned, with the amount of rainfall in the preceding year. More significantly, he found that for large fires (>5000 ha) drought conditions were not a necessary condition for fall fires, but that large fires that occurred outside of the fall season, i.e. summer and winter, occurred only under drought conditions.

### *Minimizing Wildland Fire Losses*

The current data suggest a Santa Monica Mountains fire model of increased anthropogenic fire ignitions, where fires that begin under moderate environmental conditions are rapidly extinguished. Very large fires occur under extreme climactic conditions of low humidity and high wind and will burn through all vegetation age classes; the ability to control fires under these conditions is limited. Heavy fuel loads are an intrinsic characteristic of normal chaparral development and are not the result of fire suppression leading to unnatural, landscape level, fuel accumulations. The increased fire losses in the more recent decades is not due to fire suppression but due to the increased urbanization adjacent to wildlands with a vegetation type that will always be subject to recurrent large wildfires (Keeley and Fotheringham, 2001a; Keeley, 2002a).

Where development has been located in wildland areas subject to periodic large wildfires, property loss is due to three factors: 1) the speed of the initial fire, 2) extreme climactic conditions, and 3) lack of integrated structural resistance to fire (Coleman, 1995). The speed at which large fires spread means that fires at the wildland urban interface can do major damage before the majority of firefighting forces have been deployed. In the 1991 Oakland fire, for example, the majority of the losses occurred in the first two hours of the fire (Coleman, 1995). Computer simulations of fire spread under Santa Ana conditions in Brentwood (Sapsis, pers. comm.) and Topanga Canyon (DeMartino, 2000) show fire rapidly overtaking residential areas. Destructive wildfires with large structural losses such as the 1978 Kanan fire and the 1993 Old Topanga fire spread from the inland side of the range to the coast in 2 and 4 hours, respectively. In large fires where thousands of firefighters may ultimately be deployed, these resources are not available in the initial, critical hours of the fire. Under extreme climactic conditions of low humidity, high temperatures, and high wind in wildland areas of steep topography and dense chaparral, conventional firefighting techniques are severely limited. Finally, under the conditions of large wildfires, structures that lack defensible space or resistance to fire can not be safely protected.

Wildfire property losses can not be reduced by increasing the size of the mobilization efforts, changing the initial speed of the fire or by changing the climactic conditions or the local geography of existing structures. The only realistic protection for existing structures is to assure there is an adequate defensible space and structural integrity (Cohen, 2000; Cohen and Saveland, 1997). As important to reversing the trend of escalating losses is to locate new structures away from geographically indefensible locations.

### ***Fire Management Strategies***

Large wildfires in chaparral are not controlled by younger vegetation classes but are usually controlled by changes in weather, in conjunction with changes in fuel type or successful burnouts (Conard and Weiss, 1998). Analysis of the 1985 Wheeler fire (Dunn and Pirtio, 1987 in Conard 1998) showed that 48% of the perimeter was contained by burnout, 14% due to change in fuel types, 9% due to obstructions, 11% due to weather changes (marine air), and 10% to direct attack. The fire burned around a 1-year old burn (1984) but 10-year old burns had no effect on the perimeter. Prescribed burning to create a mosaic of age classes is ineffective as a fire management technique due to the fire behavior of large fires and the practical and social constraints associated with sufficient prescribed burning to create a landscape level mosaic (Keeley et al, 1999; Conard and Weise, 1998).

A more current model of fire management in the chaparral is a strategic approach with three major objectives described by Conard and Weise, (1998):

- 1) To contain wildland fires strategically within easily defended borders.
- 2) To maintain a chaparral fire regime that fosters healthy, sustainable ecosystems in wildland areas.
- 3) To separate the wildland urban interface areas from natural fuel complexes, both to protect the wildland urban interface areas from wildland fires and to protect wildlands from fire starts in the wildland urban interface.

### ***Fire Hazard Assessment***

Fire management strategies need to be rigorously evaluated to identify values at risk from wild-fire and to identify fire management strategies that will quantitatively reduce the fire hazard to those resources at risk.

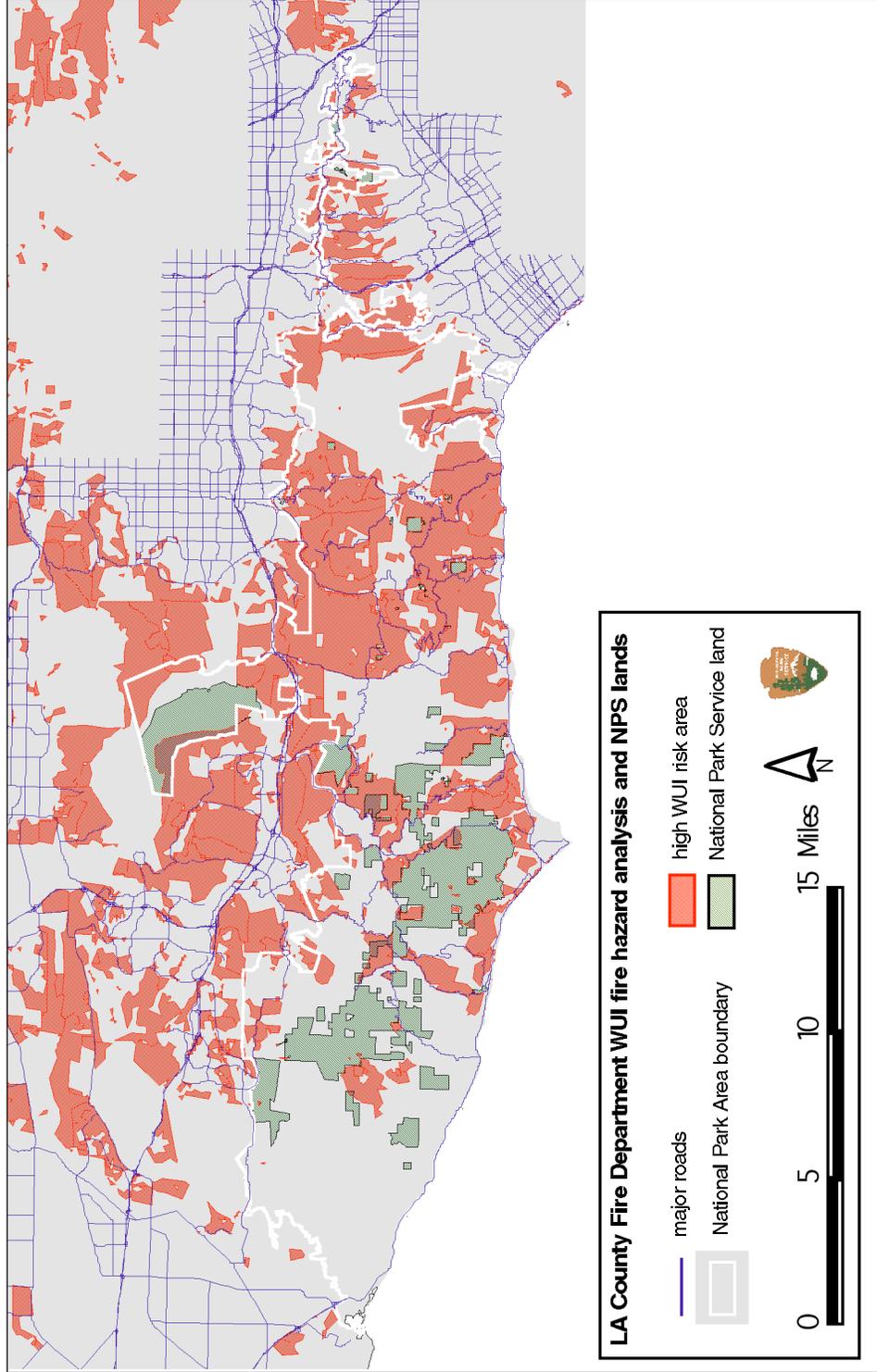
#### **Estimating Risk**

##### ***Social Values***

Los Angeles County has identified communities at risk from fire hazard. Fire threatened wildland urban interface areas were identified by locating all development at densities greater than 1 unit/40 acres within 1.5 miles of areas that were a fire threat based on fuel hazard, probability of burning, and housing density. Using these criteria, the majority of the Santa Monica Mountains is considered to be a wildland urban interface area at high risk from wildland fires (Figure 3-17).

This figure illustrates that there are limited areas where structures are located adjacent to the NPS boundary. In these areas fire hazard is mitigated with mechanical fuel reduction treatments (Table 2-3, Figure 2-1).

Figure 3-17 Los Angeles County Wildland Urban Interface Hazard Map: Communities at Risk



Although the Los Angeles County risk map accurately shows that a large proportion of the Santa Monica Mountains is at risk from wildfire, it is not useful in identifying potential strategic fuel modification sites because of the lack of sensitivity and discrimination in the analysis.

To identify areas that might provide opportunities to either control fire spread (fuel modification strategies) or provide opportunities to contain the fire perimeter (fire containment strategies), a simple GIS-based analysis was developed from general principles of fire ecology and firefighting operations. The model is based on slope, vegetation type, vegetation age, and density of nearby structures (Figures 3-18 to 3-21).

A 30-meter digital elevation model was used to calculate slope steepness and identify areas where slopes are moderate enough that opportunities to control wildfire might exist. The thresholds selected were slopes less than 20 percent (optimum) and slopes between 20 to 40 percent (moderately feasible) (Figure 3-18). Slopes steeper than 40 percent limit tactical firefighting options such as mechanized equipment and make aerial resources, particularly air tankers, less effective.

The value of fuel modification to reduce fire hazard is strongly dependent on the type of vegetation and the age of the vegetation. Coastal sage scrub and grassland vegetation attain only relatively low levels of fuel loading at any age, and they exhibit very rapid rates of regrowth. Thus fuel modification projects in these vegetation types produce only relatively small and short-lived tactical benefits to firefighters. Chaparral has the highest fuel loads, generates the most intense and hazardous fire conditions, and takes longer to accumulate maximum fuel loads than other vegetation type in the Santa Monica Mountains. Because total standing biomass in chamise chaparral has been shown to level off after 35 years, chaparral over 35 years in age was selected as the vegetation criterion that would provide the greatest benefit on fire behavior from fuel modification. Fire history data was combined with the park's vegetation map to show where chaparral vegetation types (and non-native tree plantings) more than 35 years old occur (Figure 3-18). Chaparral is classified as a Type IV, 35 to 200 year infrequent replacement regime in the National Fire Plan's fire regime classification model. By using the 35-year standard, the minimum time for an appropriate fire return interval is applied to strategic fuels treatment proposals.

A simple overlay of these datasets produced a map of areas meeting all three criteria (Figure 3-18). These sites are areas that may be appropriate for strategic fuel modification projects. All other areas fail to meet at least one of the criteria defined as necessary to support successful strategic fuel modification projects. Overlaying a tract coverage shows how opportunities for strategic fuel modification are distributed among various land jurisdictions (Figure 3-19). The largest and most spatially contiguous areas where strategic fuel modifications might improve fire safety are located in the eastern half of the park, especially in the Topanga area (Figure 3-20).

Given the reality of limited funds to support fuels treatments and the narrow window of opportunity to conduct these treatments under favorable weather and air quality situations, a prioritization process for evaluating potential treatments is required. This prioritization process will include an evaluation of population density and the ability of a treatment to protect residences

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Fuel modification projects are meant to reduce the risk to communities from wildfire, but their effectiveness depends on when a wildfire occurs along the post-treatment timeline. This is illustrated with the arrows indicating the potential for a wildfire event at various points along the post-treatment timeline in Figure 3-22. When a wildfire occurs early in the post-treatment time line, the treatment will be most effective in providing protection and risk reduction. When a wildfire occurs late in the time line, the treatment will be minimally effective. The inherent conflict between fire hazard reduction and resource protection is that fuel treatments that are the most beneficial because of early wildfire also have the greatest potential to seriously degrade native plant communities. In this example, it is only in an intermediate post-treatment time frame that treatment is both effective at reducing risk and does not adversely impact the plant community. The time between median ecological risk and the time at which re-treatment is necessary is called the *hazard reduction window*. The hazard reduction window is the period of time during which a wildfire would be successfully modified by the treatment and which would not adversely affect the composition of the native plant community.

Obligate seeding species such as *Ceanothus megacarpus* are the most sensitive to short fire-return intervals i.e., they have the longest post-treatment period in which they are subject to ecological risk from fire return. Vegetation dominated by facultative seeder and obligate sprouter species will generally have a shorter post-treatment risk period.

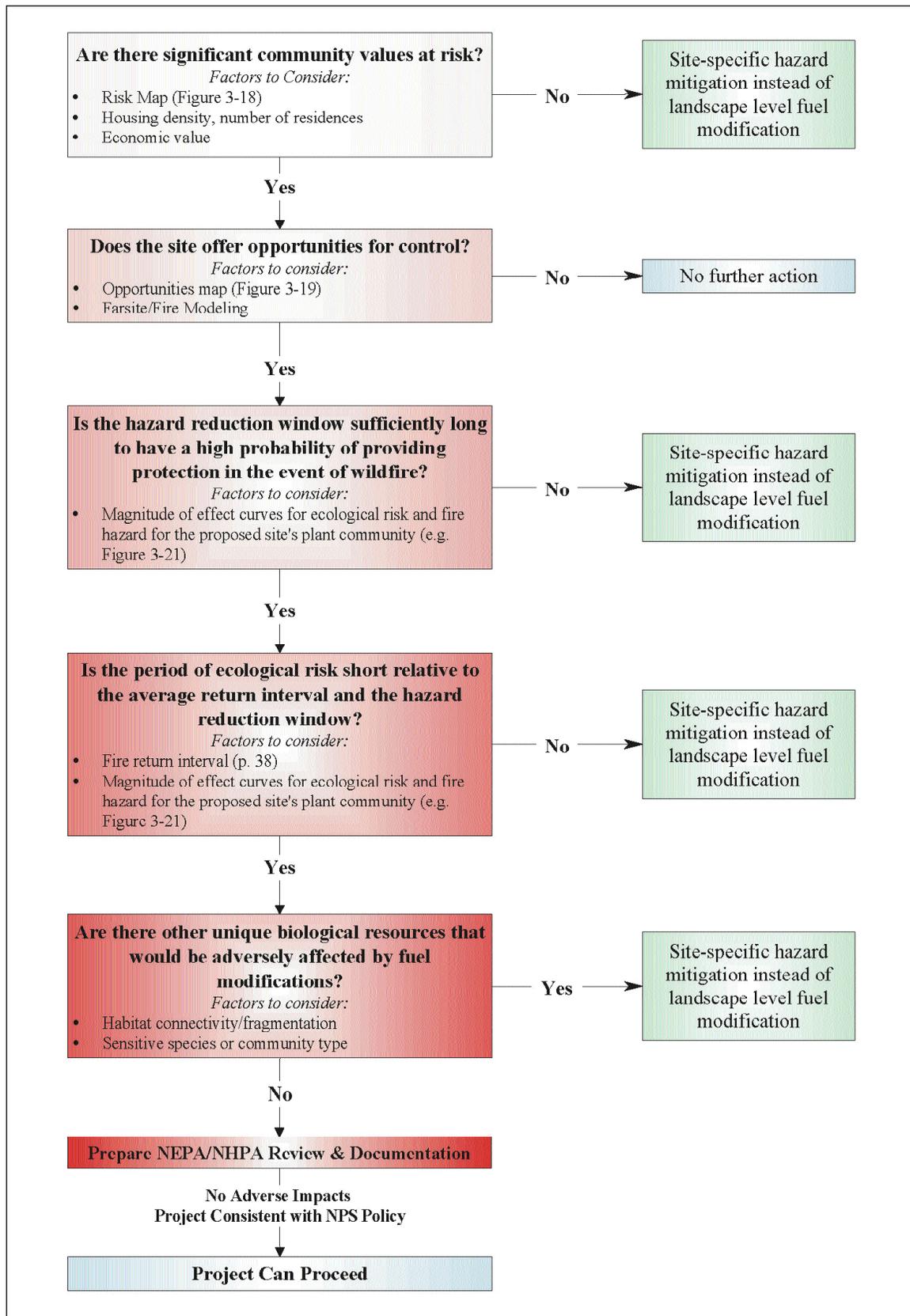
### Decision criteria for strategic fuel modification projects

Any fuel modification project proposed as mitigation for fire hazard must demonstrate the effectiveness of the treatment to reduce the fire risk to susceptible targets. The effectiveness of defensible space (Defensible Fuel Profile Zones) and hardening of structures to prevent wildfire structure loss at the urban-wildland interface is well understood (Cohen and Saveland, 1997). Modeling of large, landscape-scale fuel treatments show no difference in the total amount of acreage burned between no action and treatment scenarios, although there is some evidence of reduced acreage burned within targeted areas when spatial priorities for treatment locations are applied (Jones et al, 2003). Strategic fuels treatments are most effective for fire control under slope and fuel driven fire scenarios. During extreme weather events, such as sustained Santa Ana winds, treatment areas will normally burn. These treatments are effective at the shoulders of an extreme weather event as normal weather patterns return to the local fire area. This was observed during the October 1993 Kinneloa fire on the Angeles National Forest. The fire was contained on the western flank along the Mount Lowe fuelbreak as the Santa Ana winds slackened. This fuelbreak had been maintained with prescribed fire in February of 1993. The fire also held on the edge of the 1980 Pinecrest Fire with minimal suppression efforts applied to the 13-year old vegetation. However, during the height of the Santa Ana winds, the 10-month old Lake Avenue fuelbreak, which had also been treated in the February of 1993, burned over without substantially affecting fire behavior (Dave Kerr, pers obs).

Figures 3-18, 3-19, and 3-21 identify potential strategic fuel modification locations. Proposed strategic fuel modification projects will be evaluated according to the decision model shown in Figure 3-23. The decision model requires that changes in fire behavior and any associated

enhanced protection of improvements be weighted against the ecological risk to resources from wildfire or cyclic fuels treatments. Changes to the fire environment will be analyzed with fire behavior models such as FARSITE and FlamMap to evaluate how the proposed action would affect both fire spread and fireline intensity. The ecological risk will be evaluated by the SMM-NRA Resource Management staff based on the best available data regarding vegetation response to disturbance. When landscape level treatments (i.e. those remote from the wildland interface) are found to be ineffective or overly damaging to resources, then site specific hazard mitigation treatments will be recommended in proximity to those values identified to be at risk. Project specific National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) compliance will be required on all proposed strategic fuels proposals. The required environmental review will provide the framework for balancing the environmental risk against the social benefits of the treatment.

Figure 3-23 Decision Model for Strategic Fuel Modification Projects



## Risk Assessment and Public Safety

The NPS and other fire management agencies can assess relative wildfire hazard and may be able to identify actions or projects that would reduce the wildfire risk to life and property. Reducing wildfire risk does not eliminate the hazard, however. It is impossible in the fire climate of the Santa Monica Mountains to reduce risk to the extent that public safety can be guaranteed during an extreme wildfire event. Safety during a wildfire event is the responsibility of every individual. Residents need to understand the nature of the environment they live in, to anticipate the potential worst-case wildfire scenario, and to take the necessary preparation and preventative actions to protect themselves, their families, and their property.

## IV Natural Resources

### AI Biological Resources – Vegetation and Fire Effects

#### *Vegetation Types*

In the Santa Monica Mountains, the distribution and composition of plant communities is determined mainly by the amount and seasonality of available water and sunlight. These factors, in turn, are influenced by elevation, aspect, slope, soil type, proximity to the ocean, and fire history. The history of local human land use is also a significant factor.

Munz (1974) identified seven plant communities in the Santa Monica Mountains: coastal strand, coastal salt marsh, freshwater marsh, coastal sage scrub, chaparral, valley grassland, and southern oak woodland. Raven et al. (1986) in the *Flora of the Santa Monica Mountains* include the following vegetation types: chaparral; coastal sage scrub; southern oak woodland; valley grassland; riparian woodland; intermittent stream bed; lake, pond and quiet stream aquatic; freshwater marsh; coastal strand; coastal salt marsh; marine meadow; and surfweed.

The most recent classification and vegetation map of the Santa Monica Mountains (Franklin, 1997) identifies 12 communities (Figure 3-24), which are derived from 26 vegetation associations identified by the California Natural Diversity Database classification system (Holland 1986).

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Various subcommunities, dominated by one or more species are described below.

**Northern mixed chaparral (51.8% of total area)** is found throughout the Santa Monica Mountains on moist, north facing slopes. It contains a diversity of large shrubs, including scrub oak (*Quercus berberidifolia*), greenbark or spiny ceanothus (*Ceanothus spinosus*), mountain mahogany (*Cercocarpus betuloides*), toyon (*Heteromeles arbutifolia*), hollyleaf redberry (*Rhamnus ilicifolia*), sugarbush (*Rhus ovata*), hollyleaf cherry (*Prunus ilicifolia*) and manzanita (*Arctostaphylos glauca* and *A. glandulosa*). Northern mixed chaparral, as currently mapped by the park, also includes Ceanothus dominated chaparral. Ceanothus chaparral primarily occurs on stable slopes above 1000 feet. On some coastal slopes, bigpod ceanothus (*Ceanothus megacarpus*) makes up over 50 percent of the vegetative cover, with greenbark *ceanothus* dominant in more mesic microsites. Hoary-leaved ceanothus (*Ceanothus crassifolius*) is the more common species on Boney Ridge, Tapia Park, and in the Simi Hills on dry slopes. Hairy-leaf ceanothus (*Ceanothus oliganthus*) occurs in more mesic sites in the Simi Hills and on the highest peaks in the Santa Monica Mountains. In addition to Ceanothus, associated species include chamise, black sage (*Salvia mellifera*), laurel sumac, and big berry manzanita (*Arctostaphylos glauca*), and other shrubs.

**Red shank chaparral (0.54% of total area)** is an unusual plant community that occurs in four distinct populations in California: southern San Luis Obispo County, Santa Monica Mountains, San Jacinto/Santa Rosa Mountains and northern Baja California. This community, characterized by red shank (*Adenostoma sparsifolium*), is well developed in the vicinity of Circle X Ranch, but may be found intermittently throughout the Santa Monica Mountains. Red shank chaparral is usually found on dry, fine-textured, well drained slopes and mesas at intermediate and higher elevations. In addition to red shank, it includes the following species: chamise (*Adenostoma fasciculatum*), sugarbush (*Rhus ovata*), ceanothus species (*Ceanothus megacarpus*, *Ceanothus crassifolius*) and occasionally woolly blue curls (*Trichostema lanatum*).

**Chamise chaparral (2.01%)** is found primarily on dry south-facing slopes or ridges. This community is overwhelmingly dominated (80 percent) by chamise, but may also contain black sage, sugarbush, bigpod ceanothus (*Ceanothus megacarpus*) and a variety of other species.

### ***Post-fire herbaceous flora***

One of the characteristic elements of chaparral and coastal sage vegetation, and an important contributor to the floristic diversity of the SMMNRA, is the abundant growth of a fire-ephemeral flora that occurs in the first 1-3 years following fire (Westman, 1979). This flora includes annuals, herbaceous perennials, vines, suffrutescent shrubs, and subshrubs. Herbs comprise more than three-fourths of the total post-fire number of species, area cover, and biomass (Keeley, 1981). Some of these species are pyrophyte endemics which persist in inter-fire years only in the seed bank. Other species, while more abundant following fire, may persist in canopy gaps, on disturbed sites or at xeric margins. When combined with resprouting shrubs and shrub seedlings,

the diversity of post-fire chaparral approaches that of the high diversity mature fynbos and kwongan communities of South Africa and Australia (Cowling et al, 1996).

### ***Fire Effects on Chaparral***

The density and continuity of chaparral, its structural arrangement and chemical composition, in combination with extended drought of 6-8 months, make it one of the most volatile fuel types in the world (Schroeder, M.J et al., 1964). Physical characteristics of chaparral that promote intense wildfires include: 1) the spatial continuity of shrubs within stands that provide uniform fuel beds for the rapid and sustained spread of fire; 2) multiple stems which create high level of exposed surface to volume ratios in the above-ground biomass; and 3) high concentrations of volatile extractive compounds (resins, oils and turpenes) (Countryman and Philpot, 1970).

Chaparral fires are generally stand replacing fires that kill all above-ground vegetation. Chaparral is considered to be a highly resilient to fire disturbance because of the tendency to return rapidly to its pre-fire composition (Keeley, 2000). Hanes (1971) termed this phenomenon “auto-succession.” There is little data on whether fine-scale changes in community composition occur as the result of differential fire-induced mortality of lignotubers and seeds or of differential seedling survival.

Despite its fire successional nature, chaparral in the Santa Monica Mountains does not require fire for ecological health. Old stands of chaparral are not “senescent,” “senile,” “decadent,” or “trashy” (Keeley, 2000; Zedler and Zammit, 1989; Keeley, 1992a; Zedler, 1995); nor is there evidence of declining productivity in nearly century old stands (Keeley and Keeley, unpublished data in Keeley, 2000; Hubbard, 1986; Larigauderie et al, 1991); and chaparral is not successional to other vegetation types in the absence of fire.

Individual chaparral species have characteristic post-fire regeneration modes that are classified as either obligate seeders (mature plants killed by fire, recruitment from a soil seed bank), obligate sprouters (seeds killed by fire, regeneration by basal sprouting) and facultative seeder/sprouters (mixed seedling recruitment and vegetative resprouting). Among potentially resprouting species (both obligate sprouters and facultative sprouters), fire caused mortality of mature shrubs is variable. Some species have almost 100% vegetative resprouting (e.g. *Quercus berberidifolia*, *Heteromeles arbutifolia*, and *Malosma laurina*). Other species may suffer extensive mortality such as *Adenostoma* and *Ceanothus* sect. *Euceanothus*. Variation in survival may depend on fire intensity, fire frequency, soil moisture, plant size and physiological condition (Keeley, 2000). Variation in vegetative survival observed with different season of burn is likely due to differences in environmental and plant physiological status associated with seasonal changes.

Seedling density of obligate seeders and facultative seeder/sprouters is typically two orders of magnitude greater than pre-fire shrub density (Moreno and Oechel, 1992), with high seedling mortality in the first year(s) post-fire. Mortality has been correlated with both proximity and distance to resprouts, depending on the species; herbivory; and most importantly, differential drought tolerance (Keeley, 2000; Davis, 1989; Davis et al, 1998). Reproductive maturity requires 5-15 years before significant seed crops are produced and fires at more frequent interval can

cause local population extinction (Zedler et al, 1983; Zedler, 1995; Fabritius and Davis, 1995). The life history of obligate seeders is classified as disturbance dependent, i.e., disturbance in the form of fire is required for seedling recruitment and population expansion. Obligate sprouters have a disturbance-free life history, i.e., seedling recruitment and population expansion occur in the fire-free interval. Obligate sprouters can persist in a high frequency fire environment through resprouting of mature individuals, but population expansion can occur only when fire-free intervals are long enough to allow new seedlings to reach a sufficient size to survive fire. Fire may still play an important role in this reproductive guild because recruitment to the canopy is rare and most saplings remain stunted under closed canopy conditions. Fire may therefore be required to make the transition from sapling to adult (Keeley, 1998b).

Chaparral species have correlated physiological traits associated with their reproductive mode. Disturbance dependent, obligate seeding species have shallower roots, higher tolerance of water stress, and greater post-fire seedling survivorship than disturbance-free, obligate sprouting species. The profound impact of physiological attributes on post-fire population structure is exemplified by *Malosma laurina*. This species vigorously resprouts after fire (100% regeneration) as well as produces an abundant post fire seedling crop. However, this extremely deep rooted species has very little tolerance to water stress and virtually all seedlings die (99%) in the first summer following a fire (Davis et al, 1998). Because of its physiology, this species, which is a facultative seeder/sprouter, behaves as a functional obligate resprouter and is regenerated after fire solely through vegetative resprouting.

The dramatic post-fire herb flora is a highly heterogeneous community. The density of herbaceous seedlings is very patchy, from microsites devoid of seedlings to sites of dense seedlings. Seedling density has been partly related to fire intensity where increased soil heating leads to increased seed mortality; areas with the highest seedling densities are in canopy gaps (F. Davis et al, 1989; Rice, 1993; Tyler, 1995 in Keeley, 2000). In 90 sites in southern California following the widespread 1993 fires, average 1st year post-fire cover was 72% (5-200%). Fire intensity (fire severity) was negatively correlated with species richness and total plant cover (Keeley, 1998a). This abundant natural post-fire cover argues against the need for any supplemental seeding for watershed rehabilitation in this community type.

Although annuals generally dominate the post-fire flora, herbaceous perennials and suffrutescents (e.g. *Lotus scoparius*, *Helianthemum scoparium*, *Eriophyllum confertiflorum*) are also an important component. In southern California as a whole, annuals are more dominant on better drained, hot, interior sites and herbaceous perennials are relatively more important on milder coastal sites with better water holding capacity (Keeley, 1998a).

### ***High Fire Frequency and Vegetation Type Conversion***

Although chaparral and coastal sage scrub may be adapted to the occurrence of fire, they are not adapted to all fire regimes. Where fires are frequent, non-native herbaceous annual vegetation has been observed to increase and replace shrublands (Vogl, 1977; Barro and Conard, 1987; Haidinger and Keeley, 1993; Beyers et al., 1994). This type of conversion, of shrubland to annual grassland, has been widely observed in California (Keeley, 1990; Minnich and Dezzani, 1998; Keeler-Wolf, 1995).

Natural variability in the fire regime interacts with varying regeneration strategies to maintain species diversity. However, if fire frequency exceeds that to which species are adapted, post-fire plant regeneration will be reduced and vegetation will respond negatively. Sensitivity to high fire frequencies varies with regeneration strategies. Non-sprouters show the greatest sensitivity to short fire return intervals and may be eliminated by a single premature burn. If an area is reburned before plants reach maturity and replenish seedbanks, local extinction can occur (Biswell, 1989; Zedler, 1995). Non-sprouting species need at least seven years to reach seed producing maturity (FMP, 1994) and if conditions are unfavorable, up to 15 years or longer (Biswell, 1989). Non-sprouting shrubs have only limited dispersal ability and once lost from an area, recolonization from other established populations can be extremely slow (Zedler and Zammit, 1989).

Obligate resprouters show greater resilience under short fire return intervals (Zedler et al., 1993; Fabritius and Davis, 2000), but nevertheless may be severely impacted by sustained high-frequency fire regimes. Successful germination and recruitment of new individuals is correlated with the cooler, moister, low light conditions and increased litter depth associated with the mature closed-canopy chaparral that develops over fire-free intervals of forty years or more (Lloret and Zedler, 1991; Keeley, 1992a & b; DeSimone, 1995). If a short-interval fire regime is maintained, senescent individuals and lignotubers that inevitably perish in fires will not be replaced, resulting in loss of resprouting populations over time (Zedler, 1995).

Although facultative seeders resprout after fire, mortality of lignotubers, particularly in chamise, can be very high if fire returns prematurely (Kay et al., 1958; Zedler et al., 1983; Haidinger and Keeley, 1993). Since a premature fire also kills seedlings that germinated in response to the previous fire, facultative seeders show only limited ability to persist under repeated disturbance.

Chaparral is generally believed to be adapted to fire return intervals ranging between 20 and 150 years, with average natural return intervals of 50 to 70 years (Minnich, 1983; Davis and Michaelson, 1995; Conard and Weise, 1998; Mensing et al., 1999). The return interval which eliminates shrublands is not clearly defined and is dependent on the interaction of fire with other environmental conditions and disturbances (Keeler-Wolf, 1995; Minnich and Dezzani, 1998). O'Leary (1995b) estimated that fire return intervals of 5 to 10 years can result in chaparral replacement by coastal sage scrub while others have found that this same interval will cause the replacement of coastal sage scrub with exotic grasslands (Timbrook et al., 1982; Minnich and Dezzani, 1998). However, even fire intervals of 20 years or longer may result in significant changes in stand structure (Parker, 1989).

Sensitivity of vegetation to short fire return intervals varies with species composition. A single premature fire can dramatically transform vegetation dominated by non-sprouters while vegetation dominated by resprouters may require years of sustained high frequency fires before a significant loss of shrubs occurs.

The introduction of herbaceous exotics, particularly annual grasses, has fundamentally altered the fire-ecology of southern California and plays a significant role in the conversion of shrublands to annual grasslands. Annual grasses increase fire frequency by changing the amount, dis-

tribution, and seasonal availability fuels for fire (Giessow, 1997). These grasses complete their life cycle early in summer season, but do not easily decompose (D'Antonio and Vitousek, 1992; O'Leary, 1995). This results in a large amount of fine standing dead fuel that supports very rapid rates of fire spread under a broader range of weather conditions than chaparral (Barro and Conard, 1987). Dry grasses have the lowest heat requirements for ignition and therefore have the longest fire season and highest fire frequency of any southern California vegetation type (Radtke, 1983). Most importantly, the capacity of exotic herbaceous fuels to burn is little influenced by previous fire history. Herbaceous fuel build-up is sufficient to support fire return intervals of one or two years, a cycle that will eliminate shrub communities (Zedler et al., 1983; Nadkarni and Odion, 1986; Minnich and Dezzani, 1998).

Although grass fires are less intense than shrub fires, they nevertheless consume native seedlings (Barro and Conard, 1987). If fire recurs at sufficiently short intervals or at inappropriate times, it can also kill resprouting shrubs (Murphy, 1968; Radtke, 1981; Zedler et al., 1983). At the same time, low-intensity grass fires can result in reduced seed mortality of opportunistic annuals (Moreno and Oechel, 1991a; Stephen Davis, personal communication). A positive-feedback cycle is thus initiated: fire opens the shrub canopy allowing establishment of exotic herbs, the presence of exotic herbs increases fire frequency, and frequent fires further increase the abundance of exotic herbs (Giessow, 1997). High fire frequency is perpetuated and ultimately there is type conversion of shrublands to exotic grasslands (Keeler-Wolf, 1995).

In addition to changing fire frequency, non-native grasses and forbs also alter nitrogen and organic matter cycles (Zink et al., 1995) and strongly compete for water and nutrients (Schultz et al., 1955; D'Antonio and Vitousek, 1992; O'Leary, 1995b; Eliason and Allen, 1997). Native annuals compete poorly and are quickly eliminated with the introduction of exotics (Keeley et al., 1981). Establishment of native shrub seedlings is also inhibited. Even in the absence of repeated fires, coastal sage and chaparral shrubs show only a limited ability to reinvade sites dominated by exotic annual grasses and forbs (Zedler and Zammit, 1989; Callaway and Davis, 1993; Haidinger and Keeley, 1993; Minnich and Dezzani, 1998).

Fire return intervals in the Santa Monica Mountains threaten the persistence of the shrublands that dominate the mountains (NPS, 1994). In some areas the average fire return time is as little as ten years and sequences of fires with intervals as short as two years have occurred. The problem is particularly acute in the extensive areas of mixed chaparral dominated by non-sprouting big-pod ceanothus, where vegetation can be dramatically and irreversibly altered by a single premature fire. These sustained high frequency fires also pose a long-term threat to areas dominated by resprouting species, as recruitment of new individuals is prevented. The problem is exacerbated by the widespread occurrence of exotic grasses and forbs which often occupy sites for several years after burning and can induce fire and nutrient feedback cycles that lead to vegetation-type conversion. Vegetation-type conversion in mixed chaparral has been documented in the Santa Monica Mountains after a series of fires in 1985, 1993 (FRI = 8 years), and 1996 (FRI = 3) (Fabritius and Davis, 2000).

### ***Prescribed burning in a high fire-frequency environment***

The addition of prescribed burning into an environment with an already high fire frequency increases both the potential for negative vegetation impacts and the possibility of vegetation-type conversion. Regardless of fuel reduction, shrublands can become fire prone within a few years following a burn, particularly when exotic annuals are present. Since it is impossible to predict the future post-burn fire regime (the time until an area burns again), an unknown risk is incurred whenever a prescribed burn is done. There is no guarantee that the next burn will not occur prematurely before non-sprouting species have matured and the seed bank has been replenished. In the mixed chaparral of the Santa Monica Mountains such a burn can have devastating impacts. The potential for repeated burning to induce vegetation-type conversion, even in areas dominated by resprouters, has long been known to range managers who used frequent burns to eliminate brush and improve grazing land (Kay et al., 1958; Murphy 1968 ).

In addition to the negative ecological effects resulting from increased fire frequency, prescribed burning in and of itself causes negative effects on shrublands that can significantly contribute to vegetation degradation and type-conversion. As the inability of shrublands to recover from excessively short fire return intervals illustrates, vegetation is not simply adapted to the occurrence of fire, but instead to a complex fire regime. In addition to fire frequency and length of the fire free interval, fire regime includes the type, intensity, and seasonality of fire. All of these components are interrelated and interact with environmental and biotic factors to influence post-fire vegetation response (Biswell, 1989). Variation in the fire regime helps to maintain biodiversity by favoring different species depending on their regeneration strategies. However, if fire occurs under conditions to which shrubland vegetation is not adapted, species will respond negatively and vegetation will become degraded (Parker, 1989).

In order to control fire intensity and spread, prescribed fires are set out-of-season when conditions are moister and cooler and fuel moisture levels are higher (Green, 1981). Since chaparral and coastal sage scrub are adapted to a regime of generally intense, dry-season fires, imposition of an artificial regime of low intensity cool-season fires by prescribed burning can produce undesirable ecological side effects and potentially severely damage vegetation. Out-of-season prescribed fires have been observed to kill resprouters and reduce resprouting from lignotubers without triggering germination of replacement seedlings. Desirable species may be lost and replaced with those more suited to the artificial fire regime (Malanson, 1985). Vegetation response is therefore similar to that which occurs under excessively short fire return intervals and can ultimately result in reduced species diversity and contribute to vegetation type-conversion.

Chaparral fires consume most above-ground plant parts and post-fire immigration of new propagules into burned areas is limited. Vegetation recovery is thus dependent on germination of soil-stored seeds and resprouts from lignotubers existing at the site (Hanes, 1971). Seeds of many dominant chaparral shrubs and fire-following herbs have high heat tolerance and require high-intensity fire to stimulate germination (Sampson, 1944; Sweeney, 1956; Keeley et al., 1985; Moreno and Oechel, 1994). Prescribed burning, which is necessarily conducted under conditions that produce low fire intensities, will select against these species and the long-term application of low intensity burns may result in significant shifts in vegetation composition. This is a particular

problem in the mixed-chaparral of the Santa Monica Mountains where the dominant shrub bigpod ceanothus is killed by low intensity fires, but dependent on high intensity fires to stimulate germination. This has been recognized by local fire organizations and procedures have been attempted to create sufficient fire intensity during prescribed burns to assure adequate germination (Riggan et al., 1994; Stassforth 1997). Unfortunately, these techniques introduce new adverse ecological and aesthetic impacts.

Wildland fires are most common in late summer and autumn, when soils are dry. Prescribed fires are by necessity conducted earlier or later in the season under moister soil conditions (Green, 1981). Water decreases heat penetration into the soil, preventing necessary heating of hard-coated refractory seeds and reducing germination (Parker, 1987a,b; Riggan et al., 1988; Borchert and Odion, 1995). At the same time, many dormant seeds that readily take up moisture have reduced heat tolerance when wet and, although soil heating is reduced, show increased mortality (Sweeney, 1956; Parker, 1987; Rogers et al., 1989; NPS 1994).

Prescribed burns conducted in the winter or spring when plants are actively growing have the potential for negative impacts on post-fire resprouting. Chamise is particularly sensitive to out-of-season burning. Resprouting of chamise has been found to be significantly lower and lignotuber mortality higher when plants are cut or burned in spring rather than late summer (Jones and Laude, 1960; Doman, 1967; Rundel et al., 1987). This is attributed to reduced below-ground food reserves available for resprouting in the spring, when carbohydrates have shifted to the stems of actively growing plants. Spring and early summer fires can also be particularly damaging to coastal sage scrub, greatly reducing resprout vigor (O'Leary and Westman, 1988; O'Leary, 1995b).

Out of season prescribed fires, if done under low intensity prescriptions, can eliminate non-sprouters and reduce resprouting from lignotubers without triggering germination of replacement seedlings, creating gaps in the recovering vegetation canopy. At the same time low intensity burning can fail to produce sufficient heat to destroy seeds of opportunistic annuals (Moreno and Oechel, 1991a; Stephen Davis, personal communication). Prescribed burning thus creates conditions favorable to the introduction of exotic weeds which compete strongly with native herbaceous flora and increase the potential for initiation of a positive feedback cycle of increasing fire frequency and increasing numbers of weeds. The problem can be exacerbated when control lines are anchored at fuel breaks, trails or other access points that contain a high number of weeds (Giessow, 1997; Fabritius and Davis, manuscript in preparation). While utilizing existing vegetation breaks is greatly preferable to cutting new lines through vegetation, failure to clear these areas of exotics can result in enhanced post-burn weed ingressions.

### Coastal Sage Scrub (19.9% of total area)

The second most common vegetation type in the SMMNRA is coastal sage scrub. It occurs on drier sites and lower elevations than chaparral, especially on coastal, south-facing slopes of the Santa Monica Mountains and on inland areas of the Simi Hills. Coastal sage scrub grows on soils where moisture is available in the upper soil horizons only during the winter and summer

growing seasons. These are usually coarse, shallow soils that overlie parent materials that retain little moisture and tend to be low in nutrients. Often occurring in recently eroded areas, this community plays an important role in soil stabilization. Many of its characteristic species produce soil-holding, fibrous shallow roots which do not penetrate to deeper soil layers.

The dominant species in this community are weakly ligneous subshrubs or suffrutescent herbs that have thin, drought deciduous leaves. Active growth occurs in the winter and spring when moisture is available. As soils dry out in summer, the drought deciduous species drop the larger winter leaves which are replaced with a few smaller axillary leaves called brachyblasts. In *Salvia*, leaves may curl up during summer drought, but then expand during the following growing season making these technically evergreen leaves (Gill and Mahall, 1986 in Keeley, 2000). Often terminal portions of stems die back. Photosynthesis rates are high during the winter and spring and greatly reduced during the summer and fall. Photosynthetic rates of coastal sage species during the growing season are twice that of evergreen sclerophylls (Harrison et al., 1971; Oechel et al., 1981; Poole, et al., 1981 in Keeley, 2000). The brachyblasts of drought deciduous shrubs can tolerate extremely low water potentials and these species are therefore true “drought-toleraters” versus “drought-avoiders” (Gill and Marshall, 1986 in Keeley, 2000).

Coastal sage scrub is a mixture of herbaceous, suffrutescent, and shrubby species that is less than 1.5 meters in height, often widely spaced between plants. The coastal sage scrub community has been referred to as “soft-chaparral” because the dominant species are frequently soft-leaved, grayish green, resinous aromatic shrubs. Characteristic plants include black and purple sage (*Salvia mellifera* and *Salvia leucophylla*), California sagebrush (*Artemisia californica*), coast goldenbush (*Isocoma menziesii*) and ashleaf buckwheat (*Eriogonum cinereum*). Evergreen species that occur in coastal sage scrub include coyote brush (*Baccharis pilularis*), and the larger laurel sumac (*Malosma laurina*) or lemonadeberry (*Rhus integrifolia*) shrubs.

Related vegetation types in the SMMNRA include coastal sage scrub-chaparral transition types (0.6%), coastal cactus scrub (0.05%), and coastal bluff/dune scrub (1.39%).

### ***Fire Effects on Coastal Sage Scrub***

Coastal sage scrub is an important wildfire fuel in the Santa Monica Mountains. Fuelbed characteristics of coastal sage-scrub differ from mixed evergreen chaparral both in terms of fuel loading and fuel arrangement. Typical coastal sage-scrub species are weakly ligneous subshrubs which range in height from 0.5 m. to 1.5 m., and do not grow as densely per unit area as mixed chaparral, creating considerably less fuel loading and continuity of fuels (Westman, 1979; 1982; Keeley, 1982). The volatile oil concentrations of coastal sage-scrub species are considerably higher than mixed chaparral, which creates a higher reaction intensity per unit of fuel during pyrolysis. The more open canopy of coastal sage-scrub allows greater concentrations of grasses and herbaceous species to occupy the spaces between the shrubs than the closed canopy associated with dense stands of mixed chaparral (Westman, 1979 and 1982). This discontinuity in fuelbed characteristics is more susceptible to ignition, but has less intense fire behavior than in mature stands of mixed chaparral.

Coastal sage fires, like chaparral fires, are stand replacing fires that kill all above-ground vegetation. Both coastal sage and chaparral have abundant growth of a fire-ephemeral flora that occurs in the first years following fire. Most of the species comprising the post-fire herbaceous flora in coastal sage-scrub are common to post-fire chaparral sites (Keeley and Keeley, 1984; O'Leary, 1988; O'Leary and Westman, 1988).

Coastal sage scrub species regenerate as either facultative seeder/sprouters or as obligate resprouters that flower in the first year following fire and recruit seedlings in the second year post-fire (Keeley, 2000). Coastal sage shrubs are also capable of continuous seedling recruitment during fire-free intervals (O'Leary 1995), as well as regenerating their canopy from basal sprouts (Malanson and Westman, 1985).

Life form largely dictates the mode of post-fire regeneration. Herbaceous perennials are all obligate resprouters. Suffrutescents, with slightly woody bases above-ground are killed by fire and regenerate from an abundant seed bank e.g. *Lotus scoparius* and *Helianthemum scoparium*. Among the subshrubs, most are obligate resprouters. Two species, *Eriogonum cinereum*, *Salvia apiana*, form distinct basal burls (Keeley, 1998). Sprouting may be a necessary form of regeneration because it appears that the seeds of most coastal sage-scrub species are killed by the intense heat of a fire. However, three species of subshrubs are facultative seeders: *Artemisia californica*, *Eriogonum fasciculatum*, and *Salvia mellifera*. In these species first-year seedlings are common but resprouting is variable and there may be complete mortality at some sites. Post-fire resprouting in coastal sage scrub subshrubs tends to be more successful in younger, rather than in older shrubs and at coastal rather than inland sites (Keeley, 1998). Keeley (1998) has hypothesized that most coastal sage species are derived from herbaceous ancestors and that they lose ability to resprout as they become older and woodier.

Since a premature fire kills seedlings that germinated in response to the previous fire, facultative seeders show only limited ability to persist under repeated disturbance. Coastal sage shrub lignotubers may be similarly sensitive to short fire return intervals. However, mortality is highly variable and the ability of surviving shrubs to seed in the first year after fire appears to allow coastal sage scrub to persist under fire frequencies that eliminate chaparral (O'Leary, 1995b). Fire-recurrence intervals of 5-10 years may result in chaparral being replaced by coastal sage scrub (Keeley, 2000). More frequent fires, however will result in the transition of sage scrub to grassland that is dominated by non-native grasses (Haidinger and Keeley, 1993). Despite the apparently greater resilience of coastal sage scrub to short fire return intervals, vegetation conversion to annual grasses has been widely reported, particularly at drier inland locations (Callaway and Davis, 1993; Riggan, Franklin, et al., 1994; Minnich and Dezzani, 1998; O'Leary, 1995b). This may be due to interaction with other disturbance types such as grazing or drought or the ready establishment of exotic annual herbs which support high fire frequencies (Minnich and Dezzani, 1998). There is little data on whether fine-scale changes in community composition occur as the result of differential fire-frequency induced mortality of lignotubers, seedlings or seeds.

The presence of extensive stands of coastal sage scrub in the mountains is not inconsistent with a regime of infrequent large fires. The same characteristics that allow sage scrub to persist under moderate fire frequencies (continuous sprouting and seedling establishment) also allow perpetuation of sage scrub in the long-term absence of fire (Westman, 1981; Malanson and O'Leary, 1982; Malanson and Westman, 1985).

### Coast Live Oak Woodland (2.88% of total area)

This community is found on the mountains' more mesic sites on north slopes, in shaded ravines, canyon bottoms and along streams and is characterized by coast live oak (*Quercus agrifolia*). Coast live oak woodland can vary from mostly closed canopy to a more open canopy on drier sites, often with a rich understory of vines, herbaceous perennials and shrubs. Frequent associates include hollyleaf redberry (*Rhamnus ilicifolia*), California bay laurel (*Umbellularia californica*), coffeeberry (*Rhamnus californica*) and poison oak (*Toxicodendron diversilobum*). When coast live oak woodland occurs along stream courses in conjunction with riparian tree species it is considered to be riparian woodland. It also intergrades with northern mixed chaparral on north facing slopes and as oak savanna with scattered individuals in grassland. Live oaks are evergreen with deep taproots that can reach to the water table.

Regeneration is occurring in stands of coast live oak, with seedlings and saplings present. Seedlings survive best at the canopy margins, but recruitment from the seedling to the sapling stage is more likely in the gap between trees (Lawson, 1993).

#### ***Fire Effects on Coast Live Oak Woodlands***

Coast live oak has a thick protective bark and is one of the most resistant of the oak species to damage by fire (Plumb, 1980). Coast live-oaks are obligate sprouters and depend on epicormic resprouts (new stems that grow from the trunk and main branches of the tree) for regeneration and recovery following a fire. Acorns are killed by fire so there is no postfire seedling recruitment. Coast live-oaks retain the capability to resprout from the basal stem and branches, even when foliage is entirely burned off and the trunk and branches are blackened. The resprouting capability of oak trees following fire is highly dependent upon the size of the basal stem as well as the height of the growing crown of the tree from the ground. Oak tree survival in one study found that 99% of the trees in the six (6) inch DBH size class and above survived an intense fire Plumb (1980). However, if fires are too frequent, resprouting may not be sufficient to re-establish the oaks (Plumb and McDonald, 1981).

The high productivity of the mesic oak woodland sites means that there is frequently a heavy fuel load growing in association with coast live oak that can lead to intense fires. Anecdotal information in the 1994 FMP (NPS, 1994) stated that the Dayton Canyon Fire of 1982 caused high mortality in oak woodlands with heavy fuel loading in areas that had not burned since the 1940's and 1950's. Recommendations to use prescribed fire to protect oaks from intense wild-fire have been common (NPS, 1994; Plumb and McDonald, 1981, Green, 1979). However, post-fire monitoring of 90 oaks after the 1993 Old Topanga Fire had 96% survival after eight years and most trees had recovered 80% of their canopy cover within 2 years (Dagit, 1995 and in

press). Even severely burned trees recovered normal canopy architecture as initial epicormic sprouting transformed over the years to typical terminal branching, with some epicormic sprouts growing into stout branches to replace scaffold branches lost in the fire. Basal stem sprouting, reported as a common response in mature trees burned in intense fires (Pavlik et al, 1991), was not observed except in a single top-killed tree (Dagit, 1995 and in press). This is consistent with a 1983 Forest Service report which found that coast live oak had a “unique ability to survive wildfire” even after being completely charred. In general, only trees smaller than 3” in diameter are killed in low intensity fires, and only trees less than 6” in diameter are killed in high intensity fires. Trees in the larger size classes sprout along their trunks and branches and prefire crowns are rejuvenated within 8-10 years (Plumb and Gomez, 1983).

Seedlings and saplings, as compared to mature trees, are top-killed and regenerate from basal sprouting (Pavlik et al, 1991; Tietje, 2001). However, seedling and sapling survival is not 100%. Mortality in burned *Q. agrifolia* seedlings is approximately 3 times the mortality of unburned seedlings (46% burned mortality vs. 15% unburned mortality), but season, degree of damage, preburn height, and site location all affect seedling survival. Sapling survival (height > 50 cm) was generally much higher than the smaller seedling size classes, but sapling burn mortality was 6 times that of unburned sapling mortality (3.6% burned vs. 0.6 % unburned mortality) (Lawson, 1993). The relative change in height is negative for burned seedlings and saplings in the first years after fire (Lawson, 1993). Fire therefore delays the progression of plants into larger size classes and has the potential to delay the recruitment of mature individuals into oak woodland populations.

An additional potential demographic impact of fire on coast live oak is the anecdotal report that acorn production may be delayed in severely burned trees (Borchert, 1999).

### Riparian Woodland (1.69% of total area)

Riparian woodlands occur along canyon and valley bottoms with perennial or intermittent streams in nutrient rich soils, or within the drainage of steep slopes. The riparian community contains the greatest species diversity of all the plant communities in the Santa Monica Mountains (Rundel and Sturmer, 1998). Dominant species are coast live oak (*Quercus agrifolia*) and sycamore (*Platanus racemosa*); associates or locally dominant species include arroyo willow (*Salix lasiolepis*), black willow (*Salix laevigata*), alder (*Alnus rhombifolia*), California black walnut (*Juglans californica*), Mexican elderberry (*Sambucus mexicana*), California bay laurel (*Umbellularia californica*) and mule fat (*Baccharis salicifolia*). Riparian woodland is a particularly important plant community because of its limited area (1.69%) and its extremely high plant and animal diversity.

### ***Fire Effects on Riparian Woodlands***

Although the conventional wisdom is that wildfires “jump over or stop along riparian corridors” (Rundel, 2000), fire severity in riparian woodlands can vary from scorched or lightly burned (foliage and smaller twigs partially to completely consumed, branches mostly intact) to heavily burned (all plant parts consumed, leaving some or no major trunks). There are no data on the

frequency, severity, and physical fire properties of fires in riparian woodlands in the Santa Monica Mountains.

The effect of a severe fire on riparian woodlands in the north fork of the Matilija Creek in Ojai California was documented in a study following the July, 1985 Wheeler fire. Vegetative resprouting was variable among species: alders (7%), sycamores (83%) and oaks (70%). Regeneration was wholly by resprouting as no seedlings occurred in burned areas in the first year following the fire. Sprouting in alders was related to canyon location, sprouting in sycamores was related to height above the stream bed, and resprouting in oaks was related to size class (Davis et al., 1989). In addition to the direct effects of fire on riparian vegetation, the riparian zone is indirectly impacted by post-fire landslides and debris flows that alter the physical structure of the stream environment. In the same study, some alders and oak trees were also lost to flood flows and wind in the first years following the fire (Davis et al., 1989). Post-fire recovery in riparian zones is species specific: riparian zones dominated by sycamores and oaks may rapidly recover, while alders may re-establish much more slowly.

*Arundo donax*, an invasive woody grass of riparian areas, may alter the riparian fire regime and facilitate the further spread of *Arundo*. Dense stands of *Arundo* provide large amounts of flammable biomass that can promote intense fires that kill native plant species in the normally fire-resistant riparian zone. *Arundo* may spread more rapidly after fire by vigorous resprouting and dispersal of vegetative parts down stream (Rundel, 2000).

#### Walnut Woodland (0.17% of total area)

Stands of California walnut (*Juglans californica*) are most common in the foothills around the inland valleys of Ventura, Los Angeles and northern Orange Counties. In the SMMNRA they are located on the north slopes of the Santa Monica Mountains and in small stands in the Simi Hills on deep soils with high clay content (Quinn, 1990a). Walnut woodlands in the Santa Monica Mountains can occur with annual grassland understory, native herbaceous understory, coastal sage scrub understory, or intermixed with north slope chaparral and oak woodland.

#### ***Fire effects on Walnut Woodlands***

Walnuts have thin bark and are top-killed by even moderate intensity fires. Burned trees resprout from the base and form a ring of new stems around the base of the fire-killed stem. Survivorship in mature trees is 100% but seeds are killed (Horton, 1949). The critical size at which plants are large enough to resprout and survive fire is unknown. Older trees have a large woody platform below the soil surface which shields meristematic tissue from fire and from which new stems arise. Some of these platforms can be more than a meter across (Quinn, 1990a). Walnuts are frequently multitemmed in the Santa Monica Mountains, presumably from the high fire frequency (Witter, pers. obs.). Stand structure in a population in Brea Canyon indicates that recruitment is relatively infrequent and continuous. Trunk diameter is highly correlated with annual growth rings ( $r = .849$ ) and can therefore be used to estimate the age of individuals and stands (Swanson, 1967 in Quinn, 1990a).

### Valley Oak Savanna (0.68% of total area)

Endemic to California, valley oaks (*Quercus lobata*) occur on alluvial terraces of large valleys and on low rolling hills from Lake Shasta to northern Los Angeles County. They reach the southernmost extension of their range in Malibu Creek State Park. These trees, which are the largest oak species in North America, occur predominantly on deep alluvial soils within a narrow band of low elevation. Valley oaks can reach ages of 400-500+ years and may have trunks six or seven feet in diameter.

The valley oak savanna (also called the valley oak woodland) is typically a grassland savanna with widely spaced oaks. In the Santa Monica Mountains coast live oak (*Quercus agrifolia*) can grow with valley oak on hillside areas. Tree density may increase along bottomland riparian corridors where valley oaks are an important component of the riparian woodland. Valley oaks are not especially drought tolerant and need available soil moisture for growth (Meyer, 2001). In many areas valley oak cover may be less than 10%, which can exclude it in rule-based classification systems as a separate community type and may limit recognition of the community's full distribution in inventory and mapping programs (Davis, 2000).

Over the last 150 years, valley oak savanna has succumbed to widespread agricultural and residential development that has focused on its prime habitat – alluvial valleys. Where valley oak savanna remains, it is vastly changed. It is believed that the original grasslands associated with valley oak savanna were native perennial bunch grasslands, comprised of dozens of species of native grasses and forbs. The native grasslands have been largely replaced by alien European annual grasses, although small relict patches of perennial grasslands exist. Today the valley oak woodland is the most seriously threatened of the foothill woodland types (Davis, 2000).

Valley oaks do not have a multi-age population structure, but are comprised primarily of very large trees with a few seedlings and saplings. Many years of failed seedling establishment mean that there are few young or medium aged trees in the valley oak savanna. Lack of sapling recruitment has been identified as the greatest problem facing valley oak survival (Griffin, 1971). Seedling establishment is affected by small mammal herbivory (gophers and ground squirrels) and soil moisture availability which may be caused by factors such as competition with annual grasses or lack of late season rainfall.

Characteristic grasses of the valley oak savanna include remnant stands of native purple needlegrass (*Nassella pulchra*), and widespread alien species such as wild oats (*Avena fatua*), ripgut brome (*Bromus diandrus*), and black mustard (*Brassica nigra*). Native wildflowers include mariposa lilies (*Calochortus catalinae*), blue dicks (*Dichelostemma capitatum*) and fiddleneck (*Amsinckia sp.*).

#### ***Fire Effects on Valley Oak Savanna***

Mature valley oaks are fire resistant and able to survive grassland fires; seedlings and saplings are top-killed but can re-sprout from the root crown. Hot surface fires may kill large trees with extensive internal rot. Trees can survive moderate crown scorch from high intensity fires and

regenerate with epicormic branch sprouts (Griffin, 1976). Acorns at the soil surface are killed by fire, but seeds deeply buried may germinate following fire (Carmen et al., 1987).

The literature reports a historic fire frequency of yearly burning in valley oak savanna (Vogl, 1977). However, in the coastal zone of California, including the Santa Monica Mountains, the fire frequency from natural lightning ignitions is extremely infrequent, on the order of decades (Keeley, 2002). During the approximately 10,000 years of Native American occupation “regular” burning of grasslands occurred at an unspecified frequency (Timbrook, 1982). Based on ethnographic reports of burning deergrass for basket materials (Shipek, 1989) and the time for plant recovery and community restoration of perennial grasses (Menke, 1992), fire frequencies on the order of 3-5 years are more likely (Anderson, 1996).

Because sapling recruitment is such a critical factor in restoration of age class structure to valley oak stands, prescribed fire should be used cautiously, because top-killing will delay recruitment to larger size classes. Special protective measures for prescribed burning might include hand clearing fuels from presently established seedlings and saplings until they can attain a fire resistant size class and removing heavy fuel loads from the base of existing large specimen or potentially susceptible trees.

#### Valley grassland and non-native annual grassland (3.85% of total area).

Valley grassland was recognized by Munz (1959) and occurs throughout California from sea level to 1500m (Keeley, 1990). Today, grasslands as open grassland or as the understory of oak savanna occupy approximately 10 million hectares in California (Heady et al, 1992). Valley grassland is often dominated by non-native annual grasses and is referred to as the California annual grassland. On localized sites, native perennial bunch grasses may dominate and such sites have been interpreted as remnants of the pristine valley grassland (Keeley, 1990). The transformation from native grassland to annual grassland occurred after settlement in 1769, predominately during the late 18th and early 19th century (Hendry, 1931). The composition and structure of California grasslands at the time of European settlement is not known. The current assumption is that moister (e.g. coastal) sites such as those in the Santa Monica Mountains were dominated by perennial bunch grasses, while drier (e.g. interior valley) sites were dominated by annual grasses, forbs, and possibly shrubs (Hamilton, 1997, Schiffman, 1997).

Many theories have been proposed to explain the decline of native grassland species and the dominance of non-native annual species. These include the introduction of livestock grazing, pre-adaptation of Mediterranean annuals to grazing, competitive superiority of annuals and greater annual seed output, an extended drought in the mid-1800's, and crop tillage (D'Antonio et al, in review). Crop agriculture is a strong predictor of the presence/absence of native perennial grasses (Stromberg and Griffen, 1996).

When disturbance factors believed to cause the decline of native grasslands are removed, native dominance often does not increase, even after decades (D'Antonio et al., in review). It is believed that the seedling stage of native perennials grasses is the most susceptible to competi-

tion from annuals and that this competition inhibits re-establishment of native species.

Not all annual grasslands were previously native perennial grasslands. Former shrublands, type converted by fire, grazing, or historic native American burning are now dominated by annual grasses. Native valley grassland habitat is distinguished from former type-converted shrubland habitat by the presence of deep soils (50-100 cm), with high clay content and no rocks, on level, north- or east-exposures compared to annual grasslands on rocky, shallow soils (10-30 cm), with little to no clay content and largely on south- or west-facing exposures (Keeley, 1990 and 1993).

### ***Fire Effects on Grasslands***

Grasslands are relatively low in fuel loading (approx. 1 –2 tons per acre) in relation to other fuel types, with contiguous fuel arrangement and high surface to volume ratios. The fuel characteristics of grasslands provide a ready source for fire ignition and promote very rapid fire spread (Anderson, 1982). It was reported in the previous *Fire Management Plan* (NPS, 1994) that most large Santa Ana driven fires in the Santa Monica Mountains have ignition points in interior grasslands, but this needs to be critically analyzed and confirmed.

Type conversion of coastal sage and chaparral shrublands to annual grasslands shows that these exotic grasslands are well adapted to a high frequency, summer/fall fire regime and are one of the most fire resilient plant communities (Keeley, 1981).

The nature of the fire regime and the role of fire in the origin and distribution of native California grasslands is unknown. In the coastal zone of California, including the Santa Monica Mountains, the fire frequency from natural lightning ignitions is extremely infrequent, on the order of decades (Keeley, 2002a). During approximately 10,000 years of Native American occupation, “regular” burning of grasslands occurred at an unspecified frequency in order to increase the abundance or fecundity of geophytes, grasses and particular forbs (Blackburn and Anderson, 1993). Greenlee and Langenheim (1990) estimated a pre-contact fire frequency between 1 and 15 years.

Whatever its past history, fire remains a disturbance factor in the Santa Monica Mountains and most native grass species are tolerant of the current anthropogenic fire regime. Tolerance of fire, however, does not mean that fire is necessary for species persistence. *Nassella pulchra*, for example does not require fire or grazing to persist at a site (Bartolome and Gemmill, 1981; D’Antonio et al., in review).

Fire has the potential to aid restoration efforts in California grasslands by killing non-native seeds in the soil, killing adults prior to seed set, by stimulating the germination of native forbs and by providing a conducive seed bed for native grasses. Fire has a significant effect on annual grass abundance in the first year after fire, but will immediately revert to pre-fire levels in the second year post-fire without additional treatments (D’Antonio et al., in review). Fire therefore needs to be coupled with active restoration such as seeding or planting.

### Coastal Salt Marsh (0.26% of total area)

Coastal salt marsh vegetation occurs in estuaries where semi-enclosed coastal waters have a free or periodic connection with the open ocean and within which sea water is measurably diluted with fresh water from inland drainages. Plants in this community are adapted to a high concentration of salt, very little wave action and oxygen-depleted soils. Succulence, usually associated with desert vegetation, is a common characteristic of plants growing in the coastal salt marsh. Some representative species include pickleweed (*Salicornia sp.*), dodder (*Cuscuta salina*), salt grass (*Distichlis spicata*), and sea blite (*Sueda californica*). Examples of this type of plant community in the Santa Monica Mountains can be found around Malibu and Mugu Lagoons.

From Santa Barbara to the border with Mexico, approximately 75-90% of the original salt marsh habitat is estimated to have been lost (Zedler, 1982; CDFG, 1983; California Coastal Commission, 1989). The isolation, rarity, and dramatic loss of coastal salt marsh habitat makes this community especially important in the Santa Monica Mountains.

#### ***Fire effects on coastal salt marsh***

Not significant.

### Coastal Strand (0.49%)

The coastal strand community occurs on sand along the immediate coast. Much of this community has been lost to development or recreational uses. The habitat is characterized by strong winds, salt spray, fog, intense solar radiation, drought conditions and an infertile, unstable substrate (sand). It extends from above the high tide zone landward in a narrow band along the southwest edge of the mountains, east of Point Mugu. Characteristic plants include sand verbena (*Abronia umbellata*), silver beachweed (*Ambrosia chamissonis*), saltbush (*Atriplex leucophylla*), beach morning glory (*Calystegia soldanella*) and the alien iceplant or hottentot fig (*Carpobrotus edulis*).

#### ***Fire Effects on coastal strand***

Not significant.

### Freshwater Ponds and Lakes (0.41% of total area)

In the Santa Monica Mountains, freshwater ponds and lakes are primarily artificial, but still form an important community type that provides valuable wildlife habitat. Among these are stock ponds at Rancho Sierra Vista, Rocky Oaks, Point Mugu, Palo Comado Canyon, Nicholas Flats, the Westlake and Las Virgenes Reservoirs, and Lakes Lindero and Sherwood, as well as many other small ponds. Characteristic plants include various cattails (*Typha spp.*), bulrushes (*Scirpus spp.*), rushes (*Juncus spp.*), and duckweed (*Lemna spp.*).

#### ***Fire effects on freshwater ponds and lakes***

Not significant.

### Rock Outcrops (0.25% of total area)

Innumerable cliffs and rock outcrops of sedimentary, metamorphic and volcanic origin dot the Santa Monica Mountains. These rocky outcrops support a unique flora including lichens, club moss (*Selaginella bigelovii*), rare species of *Dudleya*, *Hemizonii minthornii*, and *Leptodactylon californicum*. These areas also provide nest sites and perches for raptors and habitat for mammals such as the ringtail (*Bassariscus astutus*) and long-tailed weasel (*Mustela freneta*).

#### ***Fire effects on rock outcrops***

Not significant.

### Agriculture (0.15% of total area)

Agriculture occurs on a small portion of the SMMNRA. These include agricultural uses that have been retained on historical lowland agricultural areas (most of which have been converted to suburban development) and relatively new agricultural uses on upland mountain slopes for uses such as avocado orchards and vineyards.

#### ***Fire effects on agriculture***

Not significant.

### Suburban Development (12.7% of total area)

Suburban development occupies a significant portion of the SMMNRA. High density development is located along the freeway corridor of the 101 freeway. Scattered local communities and low density development is located throughout the mountains and contributes to habitat fragmentation and promotes the wildland urban interface fire hazard problem

## **IV Wildlife and Fire Effects**

### **A2 Biological Resources – Wildlife and Fire Effects**

#### ***Wildlife***

The Santa Monica Mountains support an abundant wildlife community, which is reflective of the diversity of the vegetation within the SMMNRA boundary. More than 450 vertebrate species occur in the SMMNRA, including 50 mammals, 384 birds, and 36 reptiles and amphibians. The relatively intact wildlife populations of the mountains are especially impressive considering their proximity to one of the largest urban areas in the United States. The continued maintenance of wildlife populations in the Santa Monica Mountains is dependent on the ability of public and private land managers to ensure adequate habitat for the most sensitive species. As urban development within the mountains climbs up canyons, expands in pockets of low lying land, tops ridges, and encroaches on habitat adjacent to protected public land, it continues to remove and fragment habitat available to wildlife.

## Mammals

Mule deer (*Odocoileus hemionus californicus*) are the largest herbivores in the Santa Monica Mountains. Mule deer are found throughout the mountains in a variety of habitats. Their distribution is limited by the fluctuating availability of water and vegetation.

Lagomorphs, or rabbits, are represented by three species, including the brush rabbit (*Sylvilagus bachmani*), Audubon's cottontail (*Sylvilagus audubonii*) and the black-tailed jackrabbit (*Lepus californicus*). Collectively these species inhabit brushy areas and especially meadows and grasslands.

Rodents comprise the final segment of the herbivorous mammals of the Santa Monica Mountains. Common species include the California ground squirrel (*Spermophilus beechyi beechyi*), fox squirrel (*Sciurus niger*), deer mouse (*Peromyscus maniculatus*), dusky-footed woodrat (*Neotoma fuscipes*), Pacific kangaroo rat (*Dipodomys agilis*), and the pocket mouse (*Perognathus californicus*).

The Santa Monica Mountains still contain mountain lions (*Puma concolor*), although their continued ability to survive in the face of large-scale habitat fragmentation and destruction is uncertain. It is likely that their persistence in the mountains depends upon their capability of dispersing to and from other habitat areas beyond the Santa Monica Mountains.

Other predators include bobcats (*Lynx rufus*), coyotes (*Canis latrans*), gray foxes (*Urocyon cinereoargenteus*), badgers (*Taxidea taxus*), ringtails (*Bassariscus astutus*), raccoons (*Procyon lotor*), spotted and striped skunks (*Mephitis mephitis* and *Spilogale putorius*), and long-tailed weasels (*Mustela frenata*). In general, the continued persistence of carnivores depends on their ability to survive amid increased development and on the extent to which these species can disperse between remaining open space areas.

Marine mammals that occur within the boundary of the SMMNRA are limited to harbor seals (*Phoca vitulina*), which breed in Mugu Lagoon. Other marine mammals that can be readily observed from within the boundary include migrating California gray whales (*Eschrichtius robustus*) and bottlenosed dolphins (*Tursiops truncatus*).

## Birds

Located along the Pacific flyway, more than 384 species of birds (including vagrants) may be found in the mountains. In Malibu Lagoon alone, more than 262 species have been recorded. Of the total number of birds that may be found within the recreation area, approximately one-third, or 117, breed here. Thirteen of these breeders are raptors, which is an unusually high concentration. Sheer high cliffs of sedimentary and volcanic origin provide excellent nesting areas.

Historically, California condors, bald eagles and peregrine falcons nested here. Currently, golden eagles (*Aquila chrysaetos*), red-tailed hawks (*Buteo jamaicensis*), red-shouldered hawks (*Buteo lineatus*), and Cooper's hawks (*Accipiter cooperii*) commonly nest here. Prairie falcons (*Falco mexicanus*), American kestrels (*Falco sparverius*), white-tailed kites (*Elanus leuairus*), barn owls (*Tyto alba*), great horned owls (*Bubo virginianus*), western screech owls (*Otus kennicottii*), bur-

rowing owls (*Athene cunicularia*), short-eared owls (*Asio flammeus*) and turkey vultures (*Cathartes aura*) also nest within the recreation area.

## Reptiles

Twenty-five species of reptiles inhabit the Santa Monica Mountains, including two turtle (one introduced), seven lizard and 16 snake species. The western pond turtle (*Clemmys marmorata pallida*) is considered rare. Common lizards include western fence lizards (*Sceloporus occidentalis longipes*), side-blotched lizards (*Uta stansburiana elegans*), and alligator lizards (*Elgaria multicarinata webbi*). The coastal horned lizard (*Phrynosoma coronatum frontale*), a California species of special concern, is also regularly observed in the recreation area. Common snakes include southern Pacific rattlesnakes (*Crotalus viridis helleri*), gopher snakes (*Pituophis melanoiecus annectens*), and California striped racers (*Masticophis lateralis lateralis*).

Very little information is available about the distribution and status of many reptile species in the SMMNRA. For example, two-striped garter snakes (*Thamnophis couchi hammondi*), coastal western whiptail lizards (*Cnemidophorus tigris multiscutatus*), San Diego mountain kingsnakes (*Lampropeltus zonata pulchra*), and silvery legless lizards (*Anniella pulchra pulchra*) are believed to be in decline or very rare.

## Amphibians

The Santa Monica Mountains contain habitat for 11 species of amphibians, including five salamanders and six frogs or toads (two introduced). Two other species often listed for the Santa Monica Mountains, the arroyo toad (*Bufo microscaphus californicus*) and the western spadefoot toad (*Scaphiopus hammondi*), occur nearby but no historical records exist for their occurrence and no populations have been found in the SMMNRA. Until recently the California red-legged frog (*Rana aurora draytoni*) was considered extirpated. The garden slender salamander (*Batrachoseps nigriventris*) and Pacific treefrog (*Hyla regilla*) are relatively common. Other amphibian species may be suffering declines, including California newts (*Taricha torosa*), California treefrogs (*Hyla cadaverina*), and western toads (*Bufo boreas halophilus*) as a result of predation by exotic species, habitat loss, and likely other factors (e.g., U.V. radiation). In general, the decline of amphibian populations in the Santa Monica Mountains has become a priority concern.

## Fish

A variety of native and introduced fish occur in the waters of the Santa Monica Mountains. Of significance are at least two spawning populations of the endangered steelhead trout (*Onchorynchus mykiss*) and one spawning population of Pacific lamprey (*Lampetra tridentata*), as well as several locations where California grunion (*Leuesthes tenuis*) spawn. Arroyo chub occur in the slow moving waters of Malibu Creek and a variety of introduced fish, such as largemouth bass, bluegill, and goldfish, occur in freshwater streams up and downstream from recreational lakes and golf course such as Malibu Lake and the Malibu Country Club.

The lagoons provide habitat to a number of migratory water birds, and support one of the southernmost steelhead trout runs in the U.S. Besides the reintroduced tidewater goby, and resident steelhead, native fish in Malibu Lagoon include killifish (*Fundulus parvipinnis*), arrow goby (*Clevelandia ios*), staghorn sculpin (*Leptocottus armatus*), long-jawed mudsucker (*Gillichthys mirabilis*), opaleye (*Girella nigricans*), topsmelt (*Atherinops affinis*), diamond turbot (*Hypsopsetta guttulata*), northern anchovy (*Engraulis mordax*), California halibut (*Paralichthys californicus*), Pacific lamprey (*Lampetra tridentata*), queenfish (*Seriphus politus*), bay pipefish (*Syngnathus leptohynchus*), starry flounder (*Platichthys stellatus*), kelpfish (*Gibbonsia mon - terivensis*), and serranid (*Paralabrax sp.*) (Manion, 1993; Manion and Dillingham, 1989).

### Insects

Information on insects and their relationships to other organisms in the Santa Monica Mountains is very limited. The diversity and abundance of these organisms is certainly quite large. Aside from references by Emmel and Emmel (1973) and Hogue (1974, 1993), very little comprehensive information on insects exists for the mountains. Partial surveys and species lists exist from various sources (e.g. Resource Conservation District of the Santa Monica Mountains, docents from Charmlee County Park, etc.). However, few, if any, systematic surveys have been completed.

### **General Fire Effects on Wildlife**

The effects of fire on wildlife can be divided into two broad categories: direct effects that occur during the fire and later, indirect effects that occur following the fire (Quinn, 1979; Lyon et al., 1978; Barro and Conard, 1991; Patton, 1992). Both effects can significantly influence the long-term ecological dynamics of a community by directly altering local wildlife population levels and by dramatically changing habitats in areas that have burned. A number of published studies exist which address various aspects of these issues, many based on research conducted in southern California.

### Direct Effects on Wildlife During a Fire

Because so many fires happen unexpectedly, detailed, quantitative studies of the direct effects of fire on wildlife are somewhat limited, particularly for large-scale wildfires. In addition, most research in this area has focused on small animals, including small mammals, reptiles, and some birds. Despite these limitations, a substantial amount is known about how fires directly affect local wildlife species.

For relatively small vertebrates, fires can and do cause substantial mortality, and can result in local declines or extinctions in areas following fire (Wirtz, 1974; McClure, 1981; Peek, 1986; Patton, 1992). This is particularly true for species which live above ground and tend to retreat to brush or nests for safety — species such as brush rabbits, woodrats, some reptiles, and sedentary chaparral birds. For example, dusky-footed woodrats (*Neotoma fuscipes*) can be heavily impacted by fire. This species, which inhabits thick chaparral vegetation, has been observed to become

disoriented during fires, haphazardly retreating to woody nests or to roads and trails to escape oncoming flames (Quinn, 1979). Of course, these strategies are often ineffective and may be fatal, resulting in extensive woodrat mortality within a burned area. In addition, fires during breeding season may cause nestling and fledgling mortality.

Despite these potential local population impacts for small vertebrates, most researchers agree that at the regional population level, mortality effects are very small if not negligible (Wirtz, 1977; Quinn, 1979; Patton, 1992). This is because the species which are most affected are able to rapidly re-colonize burned areas through recruitment and immigration from surrounding areas as the habitat recovers following the fire. Thus, while local extinctions may occur for some species, at the landscape level these impacts are generally regarded as insignificant.

Many small animals are able to survive fire by burrowing or seeking refuge in unburned patches or other safe areas (e.g., within rock outcrops). For example, in underground burrows or under rocks, survival has been documented for small mammals and reptiles just 10 to 20 cm below the soil surface (Howard et al., 1959; Lawrence, 1966; Quinn, 1990). In these locations, animals can be insulated from surface heat as high as 500° C (Wirtz, 1977). Lawrence (1966) conducted field experiments which demonstrated that, for rodents, survival can occur within burrows because vapor pressures remain low enough to facilitate evaporative cooling from lung surfaces. In another study, 75% of Heermann's kangaroo rats (*Dipodomys heermanni*) were estimated to survive within an experimental burn by retreating to their burrows (Quinn, 1979).

Small vertebrates can also survive fires by retreating to unburned refugia within and around the burn (Quinn, 1986). For example, some lizards survive fires by escaping within rock outcrops (Kahn, 1960) and some bird species have been observed escaping fires by retreating to unburned islands and other safe areas during fires (McClure, 1981). In general, although there is a potential for significant local mortality for some species of small animals, a number of species are capable of retreating from oncoming flames, even if they remain within the immediate burn area.

Much less is known about the direct effects of fire on larger vertebrates. Where studies have been conducted, however, mortality has generally been found to be quite low (Barro and Conard, 1991). In general, larger animals such as mule deer (*Odocoileus hemionus*), bobcats (*Felis rufus*), coyotes (*Canis latrans*), and gray foxes (*Urocyon cinereoargenteus*) are capable of escaping fires by fleeing (Peek, 1986; Patton, 1992). For example, in an extensive study of Columbian black-tailed deer (*Odocoileus hemionus columbianus*) in northern California, deer were observed moving ahead of a fire and were seldom injured (Taber and Dasmann, 1957). In addition, carcasses and other evidence of large animal mortality immediately following fires are relatively rare.

Overall, the direct effects of a fire are not considered substantial for most larger animals at the regional level. In addition, although fire impacts can be fairly dramatic for smaller species in localized areas and sometimes result in local extinctions, even small species can escape fires by burrowing and seeking refuge in safe areas. For those species which do suffer fire-induced mor-

tality, the population-level effects over the long-term are not generally considered significant. These species tend to have high reproductive capacities and can readily recolonize recovering habitat from surrounding unburned sites.

### Indirect Effects on Wildlife Following a Fire — Postfire Succession

In addition to the potential direct effects of fires on wildlife, fires also dramatically modify the available habitat within burned areas (Peek, 1986; Patton, 1992). In particular, the habitat composition, structure, and resource availability for wildlife may be drastically altered for a wide variety of species and these effects may persist for several years following the fire. However, just as burned vegetation proceeds through a predictable postfire succession sequence, so too do wildlife communities. As the habitat changes and wildlife species recolonize burned areas, the original community eventually begins to reappear and function much as it did prior to the burn.

Much of the empirical work on postfire wildlife recolonization and succession has come from studies of small mammals. A number of important studies have examined this issue in some detail and have led to a fairly complete understanding of the general pattern of postfire small mammal succession in southern California chaparral (e.g., Wirtz, 1982; Wirtz et al., 1988; Quinn, 1990). In general, in the first few months to few years following a fire, small mammal communities change in predictable ways, which primarily reflect the fire survival abilities and habitat preferences of the small mammal species that occur in the area.

Based on various empirical studies of small mammal postfire succession, it is possible to construct a very generalized ten-year postfire sequence which illustrates these points. In the first one to three years following a southern California chaparral fire, species capable of surviving the fire in the burned area and species more adapted to the relatively open habitat conditions found after the burn may predominate. Examples of such species include kangaroo rats (*Dipodomys spp.*), which burrow during fires and prefer more open habitats, and other species, such as deer mice (*Peromyscus maniculatus*) and California voles (*Microtus californicus*), which benefit by more open chaparral. Over the next two to five years, as shrub species recover more fully, habitat generalist species may dominate. For example, California mice (*Peromyscus californicus*) and pocket mice (*Perognathus spp.*), which tend to occur in both open areas and within more densely vegetated cover, may increase in frequency. Finally, after five to ten years, as dense shrub cover returns to the landscape, chaparral-requiring species such as brush mice (*Peromyscus boylii*) and woodrats (*Neotoma spp.*) become most prevalent. At the same time, those species which previously took advantage of the more open areas (e.g. the voles and kangaroo rats) may become rare or absent from the postfire community.

Similar patterns of postfire bird succession have also been observed (Wirtzl 1982; Peek, 1986), with different species dominating at different times over the sequence of habitat changes. For bird species, increased dispersal and movement ability may help explain observed patterns of more rapid postfire succession relative to small mammals.

For large mammal species, postfire use of burned areas also reflects habitat conditions and resource availability, in addition to species-specific adaptations and habitat preferences. In gen-

eral, most large mammals return fairly quickly to burned areas (e.g. within months) (McClure, 1981), and often take advantage of the modified site conditions resulting from the fire. For example, rapid growth of herbaceous plant species following fires provides abundant and high quality forage for herbivores (Komarek, 1985; Peek, 1986). In burned areas, this flush of resources can attract and facilitate population increases for herbivores such as deer, which are known to rapidly recolonize and occupy burned areas in large numbers (Taber and Dasmann, 1957; Bleich and Holl, 1982; Tiller et al., 1986). In addition, the abundance of prey following fires facilitates recolonization and occupation by predators, such as coyotes, which have been observed returning to burned areas within weeks after a fire (Wirtz, 1977; McClure, 1981). In general, because of higher resource levels and modified habitat characteristics favorable to a wide variety of species, large mammals may actually be more abundant in the first three to eight years following a fire than before it.

Overall, following initial dramatic habitat changes resulting from a fire, a predictable succession of wildlife recolonization and occupation occurs which reflects patterns of vegetation succession, wildlife species habitat preferences, and species-specific survival probabilities during fires. Although wildlife abundance and species composition may vary through this succession, diversity and richness is little changed over the postfire period.

Fire has been and continues to be a natural process in fire-prone natural areas of southern California. Not surprisingly, the species within these communities have evolved a variety of individual mechanisms to respond to fires and to even take advantage of the ecological opportunities available following fire events. Although the indirect effects of fire on wildlife can be dramatic, the overall consequences should be viewed within the context of this natural process and not as a negative impact.

### Variables Complicating Fire Effects on Wildlife

The descriptions above provide fairly broad and simplified overviews of the effects of fire on wildlife communities. The ultimate results of a burn, however, will be influenced by a variety of additional complicating variables. Two of these variables, the size and spatial configuration of the burn and the intensity of the fire, can have dramatic effects on how wildlife communities respond to and recover from a fire.

Fire size and spatial configuration can substantially alter postfire wildlife recovery patterns (Quinn, 1979; Peek, 1986). Although some individual animals are able to survive within a burn area immediately after a fire, most must recolonize the site from the periphery of the burn or from unburned refugia in the burned area. In addition, wildlife species that are capable of surviving the direct effects of the fire often depend on the cover and resources available at unburned edges, both within and around the burn. These dependencies have been observed for a variety of species, including rabbits and other small mammals, various birds, and particularly for larger mammals such as deer, coyotes, and other predators (McClure, 1981; Quinn, 1986; Quinn, 1990).

It follows from these observations that a larger, more contiguous burn may result in fewer recolonization sources and less cover and resources available for wildlife. This will alter the recovery patterns for local species by affecting the availability of dispersal opportunities and limiting critical resources needed to maintain populations within recently burned sites. In addition, a larger, more contiguous fire would be expected to provide fewer escape opportunities for wildlife, thus increasing the amount of direct mortality resulting from the burn. Overall, one might expect to find a greater probability for local extinctions in larger burns and a more prolonged succession (i.e., a slower recovery) for some wildlife species (Quinn, 1986).

In addition, a very intense, fast moving fire would be expected to result in increased direct mortality within a burn area (Lawrence, 1966; Peek, 1986; Wirtz et al., 1988). In this situation, fleeing is more difficult, burrowing is less effective, and unburned refugia may be less likely to occur. This may be particularly relevant to Santa Ana wind-driven fires which occur in very dry, old chaparral — fires similar to those that occurred throughout southern California in the fall of 1993.

Very few studies have directly addressed the complicating factors of fire size, configuration, and intensity on wildlife populations (Quinn, 1979; 1986, Wirtz et al., 1988). In fact, most wildlife studies have focused on prescribed burns which not only provide very controlled circumstances, but also tend to be smaller and leave substantial amounts of unburned edge. In these cases, mortality has been found to be relatively low and recovery rates fairly rapid. It is likely, though, that this is not always the general rule. The critical role of unburned refugia and the interacting influences of fire size, shape, and intensity may significantly alter the abilities of wildlife communities to respond to and recover from fire, particularly in large, intense wildfires during Santa Ana conditions.

Overall, while many plant species seem to be fairly well-adapted to a variety of fire intensities and sizes (high fire frequencies may be a significant exception to this rule) these variables may be critical for postfire wildlife successional patterns and recovery rates. From studies of both the direct and indirect effects of fire on wildlife, the mechanisms of wildlife survival and recovery suggest that burn size and shape, and fire intensity will strongly affect postfire recovery patterns. Specifically, larger, more complete, and more intense fires may result in slower recovery and higher local extinction probabilities for a number of wildlife species. These effects may be especially acute in urban parks such as SMMNRA, where habitat is often reduced and fragmented by adjacent development (see Habitat Connectivity and Fire Effects on Wildlife section, page 5-66). In habitat fragments surrounded by an inhospitable urban matrix, burns that cover the whole fragment may cause significant mortality and even local extirpation of particular species, thereby causing long-term community changes.

### Species Specific analysis of Fire Effects

#### ***Mule Deer (Odocoileus hemionus)***

**Direct Fire Effects:** Mule deer are generally able to outrun even fast moving chaparral fires with a few exceptions noted when they become trapped or encircled by fire.

**Indirect Fire Effects:** Habitat modification by fire can be beneficial to mule deer. Major changes in plant species diversity in post-fire chaparral, as well the improvement in the nutritional quality of succulent re-sprouts and the post-fire herbaceous flora has been reported to be highly attractive to mule deer by many researchers. Herd size and productivity is limited by the condition of the vegetation utilized by the deer for browse. Mule deer populations in the Santa Monica Mountains could perhaps benefit from by prescribed burn/fuels management programs in some of the old growth chaparral areas of the Santa Monica Mountains. However deer utilize many different habitat types within the Mountains, including chaparral, and the particular quality of these different habitats for deer is unknown.

***Mountain Lion (Felis concolor)***

**Direct Fire Effects:** Although no documentation exists, it is probable that most mountain lions are able to escape even fast moving chaparral fires due to mobility and a high degree of intelligence.

**Indirect Fire Effects:** Modification of wildlife habitat by fire through enhancement of species diversity and nutritional qualities in the vegetation communities has been shown to increase wildlife populations. Mule deer are a major prey item of the mountain lion, and habitat modifications that increased deer populations could be beneficial to mountain lion populations in the Santa Monica Mountains. However the isolated and fragmented nature of the Mountains dictate that the lion population is necessarily limited, and the current status of deer populations is unknown, so deer may not be limiting factor for mountain lions in the Santa Monica Mountains.

***Bobcat (Lynx rufus)***

**Direct Fire Effects:** As in the case of mountain lions, bobcats are generally able to escape even fast moving chaparral fires, due to extensive mobility and a high degree of intelligence.

**Indirect Fire Effects:** Bobcats may be adversely affected by decimation of small mammal populations in the immediate post-fire environment, which may cause the bobcat to relocate its hunting territory. Increases in small mammal populations in subsequent years following the burn due to improved forage and seed production will be beneficial to bobcats. Bobcats are also opportunistic foragers that can probably switch between a different member of the small mammal community for prey, if certain species are more common at different stages post-fire. However appear to prefer rabbits as prey, and so as fire affects rabbit populations, it may also influence bobcats.

***Grey Fox (Urocyon cinereogenteus)***

**Direct Fire Effects:** Due to a high degree of mobility and intelligence, direct mortality of foxes during fires is insignificant in relation to total populations.

**Indirect Fire Effects:** Initial post-fire effects in terms of reduction, or relocation, of

small mammal populations within the burn area can be detrimental to foxes. Subsequent post-fire alteration of vegetation communities in terms of species composition and improved seed production results in increased populations of small mammals which is beneficial to foxes. Foxes appear to utilize dense chaparral communities in many parts of the mountains, so they may be particularly affected by large fires that consume extensive amounts of dense shrubland.

#### ***Coyotes (Canis latrans)***

**Direct Fire Effects:** Due to a high degree of mobility and intelligence, direct mortality of coyotes during fires is insignificant in relation to total populations.

**Indirect Fire Effects:** Initial post-fire declines in small mammal populations which are major prey items in coyote diets will prove detrimental to coyotes, causing them to seek other hunting areas. Subsequent changes in species composition and increased seed production in post-fire flora will result in increases in small mammal populations which could benefit coyotes. Coyotes also prey on deer, so they may benefit from activities which increase deer populations.

#### ***Long-tailed Weasel (Mustela frenata)***

**Direct Fire Effects:** Direct mortality of weasels during wildfires is probably rare due to the weasels' ability to escape the lethal effects of a fire in an underground burrow.

**Indirect Fire Effects:** Most of the small mammals utilized by weasels as prey items are able to escape the lethal effects of a fire by waiting in an underground burrow for the fire to pass. Subsequent changes in post-fire flora will tend to increase small mammal populations thus benefiting weasels by improving their prey base.

#### ***Badgers (Taxidea taxus)***

**Direct Fire Effects:** Direct mortality of badgers during wildfires is probably rare due to the badgers' ability to escape the lethal effects of a fire in an underground burrow.

**Indirect Fire Effects:** The badgers' primary prey items are burrowing animals, most of which survive wildfires by remaining in their burrows while the fire passes. Removal of surface vegetation will make it easier for badgers to locate small mammal burrows.

#### ***Rabbits (Sylvilagus spp.)***

**Direct Fire Effects:** Due to surface dwelling habits and small size, direct mortality of rabbits is high in the event of fast moving chaparral fires.

**Indirect Fire Effects:** Immediate post-fire alteration of vegetation will cause displacement of most rabbits to adjacent unburned areas. As post-fire flora re-establishes the site, congruent increases in rabbits returning and re-populating the burn area will occur.

#### ***Woodrats (Neotoma lepida, N. Fuscipes)***

**Direct Fire Effects:** Direct mortality of woodrats is very high due to surface dwelling

habits and slow mobility. Post-fire observations in the Santa Monica Mountains showed more woodrat mortality than any other species of mammal.

**Indirect Fire Effects:** Woodrats are adapted to living in stands of old growth chaparral and building their nests out of twigs placed in the basal branches of old chaparral plants. Research indicates that woodrats will not re-populate post-fire stands of chaparral until canopy closure of chaparral plants occurs, 7 – 10 years after the fire.

#### ***Grey Squirrel (Sciurus griseus)***

**Direct Fire Effects:** Some mortality of grey squirrels can be expected in very intense chaparral fires that burn off the canopies of oak and riparian woodlands which are their primary habitat. Chaparral fires tend to be patchy and burn incompletely in woodlands, providing some areas of escape. Grey squirrels usually seek to escape in the insulated environment of a tree hollow.

**Indirect Fire Effects:** Destruction of woodlands from chaparral fires would be highly detrimental to grey squirrels. Tree canopy destruction would make the squirrels more susceptible to birds of prey, and lowered acorn and other tree seed production would be detrimental in the immediate post-fire environment.

#### ***Ground Squirrel (Osteospermophilus beecheyi)***

**Direct Fire Effects:** Ground squirrels are capable of successfully escaping mortality during fires by waiting in underground burrows for the fire front to pass. Ground squirrels inhabit grasslands where fire intensity is low.

**Indirect Fire Effects:** Removal of vegetative cover can make ground squirrels more susceptible to predators in the barren post-fire environment. Subsequent improvement in the nutritional quality of post-fire herbaceous flora and increases in seed production will benefit ground squirrels.

#### ***Small Mammals***

Other mammals include pocket gopher (*Thomomys bottae*), pacific kangaroo rat (*Dipodomys agilis*), deer mouse (*Peromyscus maniculatus*), western harvest mouse (*Reithrodontomys megalotis*) California mouse (*Peromyscus californicus*), brush mouse (*P. boylii*), pinyon mouse (*P. truei*), cactus mouse (*P. eremicus*), California vole (*Microtus californicus*), California pocket mouse (*Perognathus californicus*), et.al.

**Direct Fire Effects:** Direct mortality of non-burrowing species of small mammals is very high during chaparral fires. These species, which inhabit dense grassland, such as California voles and harvest mice, suffer severe mortality of populations in grassland fires. Species such as the pocket gopher, pocket mouse, and kangaroo rat, which utilize underground burrows, are able to survive fire in the insulated underground environment.

**Indirect Fire Effects:** Although rodent populations may be severely reduced immediately following a fire, subsequent increases in species diversity, nutritional quality and

seed production in post-fire seral vegetation will produce increases in species diversity and total populations of small mammals. There can be a post-fire succession for small mammal species, in which certain species are more or less favored at different times.

### ***Birds***

**Direct Fire Effects:** Direct mortality of birds during chaparral fires is very low due to their ability to escape the fire front by flying away.

**Indirect Fire Effects:** Wars (1981) found that bird populations and species diversity increase in post-fire chaparral due to increases in seed production and insect populations. Habitat structure alteration may cause the loss of important nesting sites due to the loss of trees, shrubs, or snags, particularly for ground-nesting birds or chaparral requiring birds.

### ***Raptors***

**Direct Fire Effects:** Direct mortality of birds-of-prey during chaparral fires is rare due to the birds' ability to fly away from exposure to the fire.

**Indirect Fire Effects:** Alteration of habitat structure and composition can have beneficial and detrimental effects on raptors. The destruction of woodlands and trees during intense chaparral fires causes the loss of important nesting habitat and hunting perches for birds-of-prey. Reduced shrub cover can improve hunting success for these birds. Initial decimation of small mammal populations is not a significant problem due to the ability of the raptors to utilize hunting habitat in unburned areas. Raptors, being opportunistic feeders, will feast on the charred bodies of animals killed by fire. Subsequent increases in prey species populations in the post-fire environment will be beneficial to all raptors.

### ***Reptiles***

**Direct Fire Effects:** Direct mortality of reptiles is probably significant in terms of total populations within a burned area, although a large number are capable of escaping the fire in underground burrows and rock piles. Snakes are known to suffer significant direct mortality from fires.

**Indirect Fire Effects:** Removal of vegetative cover will cause greater susceptibility of reptiles to predation due to lack of escape and hiding cover. Immediate depletion of insect populations will be detrimental to insect-eating lizards, although subsequent increases in post fire insect populations should prove beneficial to the lizards that re-colonize the area. Snakes that feed on small mammals should benefit from increases in post-fire populations. The relative abundance of lizards in burned interior chaparral in the Mazatzal Mountains in Arizona was found to be 10 times that of unburned chaparral. Species diversity and species richness was also greater (Cunningham et al., 2002).

### ***Amphibians***

**Direct Fire Effects:** Many amphibians inhabit aquatic environments, direct mortality during fires should be low for these species. Many adult amphibians, however, including

tree frogs, toads, and many salamanders, utilize terrestrial habitats and so they are likely to suffer direct mortality. Terrestrial salamanders that live in oak woodlands may be particularly affected by fires that consume woodlands, though they may be able to escape underground.

**Indirect Fire Effects:** Even in moist habitats, extreme wildfires may consume riparian vegetative cover and surface organic matter, changing the micro-climate of the environment to a hot dry regime until the vegetation recovers. A significant indirect impact of fire on aquatic habitats is the siltation due to the loss of the vegetative cover that stabilizes soils. This impact is known to occur in and affect amphibians in the Santa Monica Mountains.

### *Fish*

**Direct Fire Effects:** There is no documented evidence of direct mortality of fish due to wildfire.

**Indirect Fire Effects:** Siltation of streams, ponds, estuaries, and reservoirs may cause significant impacts to fish populations due to increased turbidity, slower water flow and higher levels of organic matter in the water.

### *Insects*

**Direct Fire Effects:** Direct mortality of insects in wildfires is significant, although a great number do escape by flying away or in protected micro-environments such as beneath the soil surface or in the trunks of trees.

**Indirect Fire Effects:** Force (1982) indicates that species compositions and populations of insects in post-fire chaparral decline significantly from pre-fire conditions. In subsequent years nectar feeding insects dramatically increase due to the profusion of post-fire flowers, and after four years species diversity and total populations reach pre-fire levels.

## IV Natural Resources

### A3 Biological Resources – Habitat Connectivity and Fire Effects on Wildlife

Many parts of the SMMNRA exist as islands of natural habitat within an urban sea. As a result, among the greatest threats to ecological viability across the region are habitat fragmentation and loss of connectivity caused by increased development and urban encroachment. The effects of fragmentation on wildlife are many and varied and can profoundly affect the ability of remaining wildlands to support wildlife populations (Wilcox 1980, Simberloff and Abele 1982, Shaffer 1981). Fire can exacerbate the effects of habitat fragmentation on wildlife populations in several ways.

Local extinctions are one possible consequence of habitat fragmentation. Extinctions may occur because small, isolated habitat fragments support fewer species than larger more continuous areas (Willis, 1974; Diamond, 1975; Diamond, and May, 1981; Diamond, 1984). The risk of

extinction is affected by several mechanisms, such as demographic stochasticity, inbreeding depression, environmental stochasticity, and catastrophes. These mechanisms all relate to the fact that small areas can only support smaller populations, and smaller populations do not persist as long as large populations. For example, biased sex ratios, inbreeding effects (decreased genetic diversity), and catastrophic events can all affect smaller populations and potentially decrease the population's life span in comparison to larger populations. These effects are a greater problem for species that need large ranges (such as mountain lions), or are specific to particular habitats (such as *Astragalus brauntonii*) (Terborgh, 1974; Wilcox and Murphy, 1985). If wildlands in the Santa Monica Mountains are isolated due to fragmentation, local extinctions are expected. Empirical results from studies of chaparral fragments in San Diego County support this contention (Soulé et al., 1988; Bolger et al., 1991; Soulé et al., 1992).

Fragmented ecosystems experience a new set of impacts from large fires. Fire can act as an extinction mechanism, leading to the local disappearance of certain species from a burned area (Sauvajot, 1995). In an unfragmented system, the long-term population impacts of such extinction events may be inconsequential because of the availability of nearby unburned habitat to serve as a recolonization source. However, if fire-induced extinctions occur in fragmented habitats, local populations may be eliminated entirely if the burn encompasses the entire habitat fragment. In addition, because local population sizes are already relatively small in habitat fragments, fire-associated mortality may actually push population levels below viability thresholds for some species. These reduced populations will be further subjected to various extinction mechanisms, increasing the chances of their removal from the habitat fragment (Gilpin and Soulé, 1986). If the affected fragment is not close enough to recolonization sources, local extinctions can be permanent.

Another important consequence of habitat fragmentation is the loss of connectivity within formerly continuous habitats (Noss, 1987, 1991; Saunders and Hobbs, 1991). Habitat fragmentation within a region can reduce connectivity by isolating habitats from one another. For many species, this removes options for movement between remaining habitat patches. If fire-induced mortality results in local extinctions, the recolonization potential for the area depends on its proximity to other occupied habitats. For example, when a fire burns through an area, postfire recovery for many species depends on their ability to return to the burned landscape from surrounding unburned areas. In a fragmented system, individual patches may be too far apart to allow species movements to occur between patches. If this is the case, a local extinction caused by a fire can be permanent, with little or no chance for the species to return to the patch from which it was removed (Sauvajot, 1995).

In addition, many species rely on their ability to flee oncoming flames to escape fire. This strategy depends on having escape routes within habitat areas which can be used by fleeing wildlife to retreat to safe areas. Loss of connectivity can remove these options, constraining both the ability of wildlife to find escape routes and the availability of safe, unburned refugia. As a result, fire-induced mortality may increase and postfire recovery opportunities may be lost. This will likely affect the long-term persistence of wildlife species in remaining fire-prone natural

areas. Thus, the combined effects of fire and fragmentation will work together to increase the chances for species declines in fragmented areas (Sauvajot, 1995).

In human-dominated, fragmented landscapes, frequent fires near fragment edges may facilitate the invasion of edge-associated impacts into natural areas. In particular, the openings and disturbed areas created after fires can accelerate invasions by disturbance-associated exotic plants, increase the entry of development-associated species into natural areas, and facilitate other types of human-caused habitat alteration due to the proliferation of social trails and off-road vehicle access routes (Sauvajot et al., 1998). These impacts can be exacerbated by increased fire frequencies associated with nearby human development (Sauvajot, 1995).

This combination of frequent human-caused fires and disturbance-facilitated impact invasions along the urban-wildland interface may significantly alter the distribution and abundance of native wildlife in fragmented systems. In addition, large, intense fires which are potentially more damaging to native biota may also be more effective at facilitating intrusive edge effects.

In summary, several factors suggest that wildlife persistence and recovery may be substantially altered in fragmented areas following fire (Sauvajot, 1995). First, the combined extinction effects of fire and fragmentation may result in the local disappearance of some species in fragmented areas that have burned. In addition, the loss of habitat connectivity due to fragmentation and development encroachment may limit the ability of some species to respond to and recover from fires. This is because of the decrease in escape routes and increase in barriers and because a loss in connectivity may reduce chances of recolonization after fire. Finally, frequent human-caused fires in fragmented areas may increase edge effects in natural systems, impacting native biota. Each of these effects is exacerbated with the occurrence of large, intense fires.

## IV Natural Resources

### A4 Biological Resources – Non-native/Invasive Species and Fire Effects

The introduction of herbaceous non-native plants, particularly annual grasses, into shrublands and native grasslands has fundamentally altered the fire-ecology of southern California. These non-native species act in conjunction with the increasing number of fire ignitions associated with human activities, to play a significant role in the loss of native vegetation.

#### *Role of Short Fire Return Intervals on the Establishment of Non-Native Plant Species*

Fire return intervals in the Santa Monica Mountains are such that in many areas they threaten the persistence of the dominant shrublands (NPS, 1999). In some areas the average fire return time is as little as ten years and sequences of fires with intervals as short as two years have occurred. The problem is particularly acute in the extensive areas of mixed chaparral dominated by non-sprouting big-pod ceanothus (*Ceanothus megacarpus*), where vegetation can be dramatically and irreversibly altered by a single fire that occurs before plants have matured and seed banks have

been replenished. Resprouting species show greater resilience under short fire return intervals, but nevertheless may be severely impacted by sustained high-frequency fire regimes (Lloret and Zedler, 1991; Keeley, 1992a & b; DeSimone, 1995). In species such as the chaparral dominant chamise (*Adenostoma fasciculatum*), mortality of lignotubers can be very high if fire returns prematurely (Kay et al., 1958; Zedler et al., 1983; Haidinger and Keeley, 1993).

Herbs comprise more than three-fourths of the total post-fire flora, but under historic fire return intervals are rapidly displaced as native chaparral shrub species regenerate and the canopy closes. When regeneration of native shrubs is hindered or native shrubs are eliminated entirely by repeated fires, the opportunity exists for non-native annual grasses to persist at the site. These species in turn can induce fire and nutrient feedback cycles that can lead to vegetation-type conversion.

### *The Role of Non-Native Herbaceous Flora in Vegetation Type Conversion*

Once introduced into an area, annual grasses can increase fire frequency by changing the amount, distribution, and time of available fuels for fire (Giessow, 1997). These grasses complete their life cycle early in summer season, but do not easily decompose (D'Antonio and Vitousek, 1992; O'Leary, 1995). This results in a large amount of fine standing dead fuel that supports very rapid rates of fire spread under a broader range of weather conditions than chaparral (Barro and Conard, 1987). Dry grasses have the lowest heat requirements for ignition and therefore have the longest fire season and highest fire frequency of any southern California vegetation type (Radtke, 1983). Most importantly, the capacity of exotic herbaceous fuels to burn is little influenced by previous fire history. Herbaceous fuel build-up is sufficient to support fire return intervals of one or two years, a cycle that will eliminate shrub communities (Zedler et al., 1983; Nadkarni and Odion, 1986; Minnich and Dezzani, 1998).

Although grass fires are less intense than shrub fires, they nevertheless consume native seedlings (Barro and Conard, 1987). If fire recurs at sufficiently short intervals or at inappropriate times, it can also kill resprouting shrubs (Murphy, 1968; Radtke, 1981; Zedler et al., 1983). At the same time, low-intensity grass fires can result in reduced seed mortality of opportunistic non-native annuals (Moreno and Oechel, 1991a; Stephen Davis, personal communication). A positive-feedback cycle is thus initiated, where fire opens the shrub canopy allowing establishment of exotic herbs, the presence of exotic herbs increases fire frequency and frequent fires further increase the abundance of exotic herbs (Giessow, 1997). High fire frequency is perpetuated and ultimately there is type conversion of shrublands to exotic grasslands (Keeler-Wolf, 1995).

In addition to changing fire frequency, non-native grasses and forbs also alter nitrogen and organic matter cycles (Zink et al., 1995), and may strongly compete for water and nutrients (Schultz et al., 1955; D'Antonio and Vitousek, 1992; O'Leary, 1995b; Eliason and Allen, 1997). Native annuals compete poorly and are quickly eliminated with the introduction of exotics (Keeley et al., 1981). Establishment of native shrub seedlings is also inhibited and even in the absence of repeated fires coastal sage and chaparral shrubs show only a limited ability to invade sites dominated by exotic annual grasses and forbs (Zedler and Zammit, 1989, Callaway and Davis, 1993; Haidinger and Keeley, 1993; Minnich and Dezzani, 1998).

## *Fire Management and Non-Native Species*

Low intensity, out of season prescribed fires eliminate non-sprouters and reduce resprouting from lignotubers without triggering germination of replacement seedlings, creating gaps in the recovering vegetation canopy. At the same time low intensity burning can fail to produce sufficient heat to destroy seeds of opportunistic annuals (Moreno and Oechel, 1991a; Stephen Davis, personal communication). Prescribed burning, unless performed under high intensity prescriptions, can create conditions favorable to the introduction of exotic weeds, which compete strongly with native herbaceous flora and because of their increased flammability can increase the potential for initiation of a positive feedback cycle of increasing fire frequency and increasing numbers of weeds. The problem can be exacerbated when control lines are anchored at fuel breaks, trails or other access points that support high numbers of weeds (Giessow, 1997; Fabritius and Davis, 2000). While utilizing existing vegetation breaks is greatly preferable to cutting new lines through vegetation, the general failure to clear these areas of exotics can result in enhanced post-burn weed ingress. Similarly fuel breaks, as well as trails and roads, serve as sources for introduction of non-native species after wildfires into a native vegetation matrix that would otherwise be more greatly protected by distance from exotic sources.

## **IV Natural Resources**

### **A5 Biological Resources – Rare, Threatened and Endangered Species**

Twenty-three plant and animal species with potential to occur within the SMMNRA are federally listed as sensitive (S), threatened (T), or endangered (E). Three additional state-listed species occur within the Santa Monica Mountains. Another 46 animal and 12 plant species are federal or state species of concern (SC) and one additional plant species has been proposed for listing as federally endangered (a listing package has been prepared). In addition, a number of other plant and animal species are considered rare (R) or are species of concern to the recreation area. A comprehensive list of these species is provided in the following tables (Tables 3-8 and 3-9).

## IV Natural Resources

### A5a Biological Resources – Rare, Threatened and Endangered Species: Sensitive Species – Plants

Table 3-8 Sensitive Plant Species of the Santa Monica Mountains

Species Name	Federal	State
<i>Cordylanthus maritimus ssp. maritimus</i> Salt marsh bird's-beak	E	E
<i>Pentachaeta lyonii</i> Lyon's pentachaeta	E	E
<i>Astragalus brauntonii</i> Braunton's milk-vetch	E	-
<i>Dudleya cymosa ssp. marcescens</i> marcescent dudleya	T	R
<i>Dudleya cymosa ssp. ovatifolia</i> Santa Monica Mtns. dudleya	T	-
<i>Dudleya abramsii ssp. parva</i> Conejo dudleya	T	-
<i>Dudleya verityi</i> Verity's dudleya	T	-
<i>Eriogonum crocatum</i> Conejo buckwheat	SC	R
<i>Hemizonia minthornii</i> Santa Susana tarplant	SC	R
<i>Calochortus plummerae</i> Plummer's mariposa lily	SC	-
<i>Delphinium parryi ssp. blochmaniae</i> Dune larkspur	SC	-
<i>Dudleya blochmaniae ssp. blochmaniae</i> Blochman's dudleya	SC	-
<i>Dudleya multicaulis</i> Many-stemmed dudleya	SC	-
<i>Lasthenia glabrata var. coulteri</i> Coulter's goldfields	SC	-
<i>Chorizanthe parryi var. parryi</i> Parry's Spineflower	SC	-
<i>Nolina cismontana</i> California beargrass	SC	-
<i>Atriplex coulteri</i> Coulter's saltbush	-	S
<i>Nama stenocarpum</i> Mud nama	-	S

**Table 3-8 continued**

Species Name	Federal	State
<i>Senecio aphanactis</i> Rayless ragwort	-	S
<i>Thelypteris puberula</i> var. <i>sonorensis</i> Sonoran maiden fern	-	S
<i>Camissonia lewisii</i> Lewis's evening-primrose	-	S
<i>Hordeum intercedens</i> Vernal barley	-	S
<i>Abronia maritima</i> Red sand-verbena	-	S
<i>Baccharis plummerae</i> ssp. <i>plummerae</i> Plummer's baccharis	-	S
<i>Boykinia rotundifolia</i> Round-leaved boykinia	-	S
<i>Calandrinia maritima</i> Seaside calandrinia	-	S
<i>Cercocarpus betuloides</i> var. <i>blancheae</i> Island mountain-mahogany	-	S
<i>Chamaebatia australis</i> Southern mountain misery	-	S
<i>Dichondra occidentalis</i> Western dichondra	-	S
<i>Erysimum insulare</i> ssp. <i>suffrutescens</i> Suffretescent wallflower	-	S
<i>Galium cliftonsmithii</i> Santa Barbara bedstraw	-	S
<i>Juncus acutus</i> ssp. <i>leopoldii</i> Southwestern spiny rush	-	S
<i>Lepechinia fragrans</i> Fragrant pitcher sage	-	S
<i>Polygala cornuta</i> var. <i>fishiae</i> Fish's milkwort	-	S
<i>Suaeda esteroa</i> Estuary seablite	-	S
<i>Baccharis malibuensis</i> Malibu baccharis	-	S

## *Fire Effects on Rare, Threatened and Endangered Plant Species*

The plants listed as rare, threatened or endangered either occur in areas where fire effects are minimal in terms of habitat alteration (rocky outcrops, salt marshes) or they have evolved in an environment where fire plays a role in the maintenance and productivity of their habitat. It is not anticipated that the proposed fire management program will have a negative effect on these species and in some areas may enhance habitat for species now reduced in population due to fire exclusion. The following discussion focuses on the federally listed plants that may be affected by NPS fire management actions.

### *Pentachaeta lyonii* (Lyon's pentachaeta)

*Pentachaeta lyonii* is an annual sunflower that occupies pocket grasslands occurring in openings in chaparral and coastal sage. It is restricted to the central and western portion of the Santa Monica Mountains and the western Simi Hills. Of the approximately thirty-two known populations, only one occurs on a NPS site, at Rocky Oaks. However, *Pentachaeta* once occurred at Arroyo Sequit and sites such as Paramount Ranch have high potential (appropriate habitat and nearby existing populations) to support populations of the plant.

Wildfires generally occur after *Pentachaeta* has completed its growth cycle and have no direct impact on the plant. In several instances populations have been observed to expand after fires. This response is likely due to the removal of competitors and opening of suitable habitat rather than a direct fire stimulus (Keeley, 1995; USFWS 1999). However, the ingress of non-native annual grasses and herbs associated with increasing fire frequencies in the Santa Monica Mountains indirectly impact *Pentachaeta*. Competition from these non-native plants is believed to pose a significant threat (Keeley and Keeley, 1992; Fotheringham and Keeley, 1998; USFWS, 1999). The severe disruption of soils associated with grading of control lines for fire suppression may adversely affect *Pentachaeta*, although hand fire lines could potentially be beneficial.

### *Astragalus brauntonii* (Braunton's milk-vetch)

*Astragalus brauntonii* is a short-lived perennial largely restricted to the Santa Monica Mountains and the Simi Hills. Small populations also occur in the San Gabriel Mountains north of Monrovia and in the Santa Ana Mountains. *Astragalus* is associated with carbonate soils in chaparral and the rarity of carbonate outcrops within the species' range may in large part account for the plant's rarity. Populations of *Astragalus* occur on NPS property in Palo Comado Canyon and Zuma Canyon. The latter population consists of several hundred individuals. There is potential for *Astragalus* to occur at additional areas within these canyons and at other NPS sites.

Recruitment of seedlings is stimulated by fire events, which scarify the hard seed coats of dormant seeds and provide the open, unshaded conditions necessary for growth. Like most chaparral fire following herbs, seeds can persist in the soil over relatively long fire-free intervals. However, unlike typical "fire-type" herb species, *Astragalus* is not necessarily restricted to recent burn sites (Fotheringham and Keeley, 1998). Germination of dormant seeds can be

induced by mechanical scarification and a portion of the seeds germinates readily with no pre-treatment. Populations persist for several years after fire, with new individuals recruited over successive years, until recovering shrub species crowd out the *Astragalus*. The ability of seeds to germinate without fire stimulus allows plant stands to be maintained in disturbed or naturally open areas. The disruption of soil that occurs in grading fire control lines may negatively impact *Astragalus*, although grading activities for development are known to have stimulated seed germination. Competition from the high numbers of alien weeds and concentrated herbivory observed in areas disturbed by control line construction or opened by prescribed burning may negatively impact growth and seed set of *Astragalus*.

### Dudleya species

*D. cymosa ssp. ovatifolia* (Santa Monica Mountains dudleya), *D. cymosa ssp. marcescens* (marcescent dudleya), *D. abramsii ssp. parva* (Conejo live-forever), *D. verityi* (Verity's live-forever), *D. blochmaniae ssp. blochmaniae* (Blochman's dudleya).

*Dudleya* (live-forever) species are succulent, rosette forming plants that inhabit rock outcrops and rocky soils. With the exception of *D. cymosa ssp. ovatifolia*, which also occurs at two locations in the Santa Ana Mountains, all of the federally listed threatened species are endemic to the Santa Monica Mountains and the western end of the Simi Hills. All species show strong substrate and microhabitat preferences. *Dudleya cymosa ssp. marcescens* occurs on the lower reaches of sheer volcanic rock surfaces and canyon walls adjacent to perennial streams in coast live oak woodland. *Dudleya cymosa ssp. ovatifolia* occurs on rock outcroppings along shaded deep canyon bottoms and while its "Agoura" form occurs along exposed north facing slopes. *Dudleya verityi* grows on north facing rock outcrops in coastal sage scrub. *Dudleya abramsii ssp. parva* and *D. blochmaniae ssp. blochmaniae* grow in shallow rocky soils in grassland and sage scrub (USFWS, 1999). Because these habitats occur in a patchy manner within shrubland community types, *Dudleya* populations tend to have localized distributions.

*Dudleya cymosa ssp. ovatifolia* occurs on NPS parkland in Zuma Canyon and has been reported (but not confirmed) in Trancas Canyon. *Dudleya cymosa ssp. marcescens* occurs at the Circle X Ranch site. NPS parklands support ample habitat for both *Dudleya cymosa* subspecies and it is likely that more locations will be found as surveys continue. *D. blochmaniae ssp. blochmaniae* occurs in lower Zuma Canyon. *Dudleya verityi* and *Dudleya abramsii ssp. parva* have restricted distributions in the west end of the Santa Monica Mountains and Mountcleff Ridge respectively and are not likely to be found on existing NPS parkland.

*Dudleya* is easily killed by fire. In addition, the *Dudleya* species that occur on rock faces are often associated with Spike-moss (*Selaginella bigelovii*), mosses, and cushion lichens, which serve as nursery-beds for seed capture and germination (Riefner, 1992). These nursery species are also fire sensitive and any fire that reduces or eliminates these species would remove the necessary substrate they provide for unknown but potentially long periods of time (USFWS, 1999). Because of the restricted and isolated occurrences of populations it is possible that individual populations could be lost in fire events and it is not known how easily natural recoloniza-

tion would occur. Because plants grow on rock outcroppings of generally low vegetation cover and in areas of generally higher water availability there is a degree of protection from the intense fire that consumes open chaparral. The best evidence of this protection is the persistence of the existing populations through recent fires. It is unlikely that *Dudleya* would be impacted by fire suppression activities, with the exception of *D. blochmaniae ssp. blochmaniae* which grows on open ground is therefore susceptible to loss during control line grading.

### Other Sensitive Plant Species

The other sensitive species listed above are not expected to be directly adversely affected by normal fire conditions. The chaparral, coastal sage scrub, and coastal bluff species are generally adapted to or can tolerate recurring fire, while species growing in riparian areas (*e.g. Thelypteris puberula var. sonorensis*) or rocky bluffs (*e.g. Hemizonia minthornii*) are somewhat protected from fire. Fires, may however affect local individual populations. The largest threat to these species is increasing fire frequencies, which in some areas are beyond the capacity for individual species and/or vegetation to recover, and the subsequent increase in highly competitive non-native grasses and herbs. Fire management activities, such as burning out of season or grading of control lines may also adversely impact these species.

## IV Natural Resources

### A5b Biological Resources – Rare, Threatened and Endangered Species: Sensitive Species – Wildlife

Table 3-9 Sensitive Wildlife Species of the Santa Monica Mountains

Mammals	Federal	State
<i>Euderma maculatum</i> Spotted Bat	SC	S
<i>Eumops perotis californicus</i> Greater Western Mastiff Bat	SC	S
<i>Macrotus californicus</i> California Leaf-nosed Bat	SC	S
<i>Myotis lucifugus occultus</i> Occult Little Brown Bat	SC	S
<i>Plecotus townsendii townsendii</i> Pacific Western Big-eared Bat	SC	S
<i>Sorex ornatus salicornicus</i> Salt Marsh Ornate Shrew	SC	S
<i>Taxidea taxus</i> American Badger	--	SS

Table 3-9 continued

Birds	Federal	State
<i>Pelecanus occidentalis californicus</i> Brown Pelican	FE	SE
<i>Gymnogyps californianus</i> California Condor	FE	SE
<i>Haliaeetus leucocephalus</i> Bald Eagle	FT	SE
<i>Buteo swainsoni</i> Swainson's Hawk	–	ST
<i>Falco peregrinus anatum</i> Peregrine Falcon	FE	SE
<i>Rallus longirostris levipes</i> Light-footed Clapper Rail	FE	SE
<i>Charadrius alexandrinus nivosus</i> Western Snowy Plover	FT	S
<i>Sterna antillarum browni</i> California Least Tern	FE	SE
<i>Brachyramphus marmoratus</i> Marbled Murrelet	FT	SE
<i>Empidonax traillii extimus</i> Southwestern Willow Flycatcher	FE	SE
<i>Riparia riparia</i> Bank Swallow	–	ST
<i>Polioptila californica</i> California Gnatcatcher	FT	S
<i>Vireo belli pusillus</i> Least Bell's Vireo	FE	SE
<i>Passerculus sandwichensis beldingi</i> Belding's Savannah Sparrow	SC	SE
<i>Ixobrychus exilis hesperis</i> Western Least Bittern	SC	S
<i>Pelecanus erythrohynchus</i> American White Pelican	–	S
<i>Histrionicus histrionicus</i> Harlequin Duck	SC	S
<i>Aquila chrysaetos</i> Golden Eagle	–	S
<i>Accipiter cooperii</i> Cooper's Hawk	–	S
<i>Circus cyaneus</i> Northern Harrier	–	S

Table 3-9 continued

<i>Pandion haliaetus</i> Osprey	–	S
<i>Falco columbarius</i> Merlin	–	S
<i>Falco mexicanus</i> Prairie Falcon	–	S
<i>Oreortyx pictus</i> Mountain Quail	SC	–
<i>Numenius americanus</i> Long-billed Curlew	S	
<i>Sterna elegans</i> Elegant Tern	SC	S
<i>Asio otus</i> Long-eared Owl	–	S
<i>Athene cunicularia</i> Burrowing Owl	–	S
<i>Eremophila alpestris actia</i> California Homed Lark	SC	S
<i>Campylorhynchus brunneicapillus couesi</i> San Diego (Coastal) Cactus Wren	SC	S
<i>Lanius ludovicianus</i> Loggerhead Shrike	SC	S
<i>Agelaius tricolor</i> Tri-colored Blackbird	SC	S
<i>Aimophila ruficeps canescens</i> Southern California Rufous-crowned Sparrow	SC	S
<i>Dendroica petechia</i> Yellow Warbler	–	S
<b>Reptiles</b>	<b>Federal</b>	<b>State</b>
<i>Clemmys marmorata pallida</i> Southwestern Pond Turtle	SC	S
<i>Phrynosoma coronatum blainvillei</i> San Diego Horned Lizard	SC	S
<i>Phrynosoma coronatum frontale</i> California Horned Lizard	–	S
<i>Cnemidophorus tigris multiscutatus</i> Coastal Western Whiptail	SC	–
<i>Anniella pulchra pulchra</i> Silvery Legless Lizard	–	S

Table 3-9 continued

Reptiles	Federal	State
<i>Diadophis punctatus modestus</i> San Bernardino Ringneck Snake	SC	–
<i>Lampropeltus zonata pulchra</i> San Diego Mountain King Snake	SC	S
<i>Lichanura trivirgata roseofusca</i> Coastal Rosy Boa	SC	–
<i>Salvadora hexalepis virgulata</i> Coast Patch-nosed Snake	SC	S
<i>Thamnophis hammondi</i> Two-striped Garter Snake	SC	–
Amphibians	Federal	State
<i>Rana aurora draytoni</i> California Red-legged Frog	FT	S
<i>Taricha torosa torosa</i> Coast Range Newt	–	S
Fishes	Federal	State
<i>Eucyclogobius newberryi</i> Tidewater Goby	FE	SCT
<i>Oncorhynchus mykiss</i> S. California Steelhead Trout	FE	–
Invertebrates	Federal	State
<i>Euphydryas editha quino</i> Wright's Checkerspot Butterfly	FE	–
<i>Speyeria callippe callippe</i> Callippe Silverspot Butterfly	FPE	–
<i>Lycaena arota nubila</i> Clouded Tailed Copper Butterfly	SC	–
<i>Panoquina errans</i> Salt Marsh Skipper	SC	–
<i>Satyrium auretteum fumosum</i> Santa Monica Mountains Hairstreak	SC	–
<i>Brennania belkini</i> Belkins Dune Tabanid Fly	SC	–
<i>Neduba longipennis</i> Santa Monica Shieldback Katydid	SC	–
<i>Proceratium californicum</i> Valley Oak Ant	SC	–

## *Fire Effects On Rare, Threatened and Endangered Wildlife Species*

The effects of fire on threatened, endangered or sensitive species are dependent on the uniformity, severity, size, duration and season of the fire, as well as the animal's mobility to escape the fire, and their existing population demography. In all groups of animals, small and restricted populations, or those with specialized reproductive habits, are most susceptible to fire as direct mortality can cause local extinctions. Most species are not endemic to the park.

### Mammals

Seventeen species of mammals within the Santa Monica Mountains are regarded as species of special concern by federal, state, and park agencies. Bats comprise eleven of the seventeen species, and terrestrial mammals make up the rest. Little is known about bats in the mountains. Currently, an inventory is being completed to assess bat diversity and destruction of structures (i.e. tree snags, buildings) by fire, which can eliminate roosting habitat for sensitive bat species. Many terrestrial mammals can avoid fire by retreating to areas not affected by fire (i.e. below ground, between rock crevices). In some small mammal species, however, poor ventilation and high temperatures within underground burrows can cause high mortality. Ground nesting species (e.g. woodrats) are more susceptible to fire since nests are usually built of flammable materials. Most small mammal populations are affected by fire during the breeding season with high juvenile mortality, however, high reproductive rates in some mammals can offset offspring loss due to fire. Larger mammals (e.g. mountain lion) are less vulnerable to fire, however, fires moving fast with heavy ground smoke can cause some mortality. Removal of vegetative cover and litter layer by fire can decrease abundance in some species however can expose certain species to food items (e.g. seeds, carcasses) made available by fire.

The following is more specific information on the requirements and potential fire effects for the various sensitive mammal species:

#### ***Sorex ornatus salicornicus*. Salt Marsh Ornate Shrew**

Very little is known about this subspecies or about its habitat requirements. We do not have recent knowledge of whether and where it occurs in the Santa Monica Mountains.

#### ***Taxidea taxus*. American Badger**

Badgers definitely occur in the Santa Monica Mountains and in surrounding areas such as the Simi Hills, but we know little about the status or distribution of current populations. Badgers live in underground dens, prefer more open, grassy areas, and often hunt fossorial mammals such as ground squirrels or pocket gophers. Badgers may benefit from fires in some cases because of the opening up of chaparral habitat. They are reported to move into burned chaparral areas in the Sierra Nevada (Lawrence, 1966). Because the badger is a rare animal in the mountains, their populations may be more sensitive to the effects of catastrophes such as large fires.

#### ***Bats of Concern***

*Euderma maculatum* (Spotted Bat), likes to roost in cliffs and hunt in clearings. It hunts mostly moths. *Eumops perotis californicus* (Greater Western Mastiff Bat), is a rock crevice roosting bat.

*Macrotus californicus* (California Leaf Nosed Bat), roosts in mine tunnels and caves. *Myotis lucifugus occultus* (Occult Little Brown Bat), hibernates in caves and mines, and may roost in houses and other buildings in summer. It forages over water and other open spaces. *Plecotus (Corynorhinus) townsendii townsendii* Pacific Western Big Eared Bat, roosts in mines and caves, and eats almost strictly moths. It forages over open woodlands and is very sensitive to disturbance.

All of these bats are insect eaters, and none of them use trees as primary roost sites. Fire/smoke could directly affect roost sites, which may change during the year as temperature changes. Most bats are born in the late spring, but there is a lot of variability.

## **Birds**

Over 60 species of birds are considered threatened, endangered or of special concern within the Santa Monica Mountains. Most species on the list do not breed in the park but rather, occur as residents, utilizing the mountains during the non-breeding season. Shorebirds (~16 species) and other waterbirds (~4 species) are least affected by fire as food niches occur in habitats that are not fire-prone (i.e. coastal beaches, lakes). Raptors (~20 species) are also unaffected or respond favorably to burned areas as fire causes immediate post-fire prey mortality for scavengers and exposes vegetative cover for prey resources. The effects of fire on insect- and plant-eating birds (~21 species) are dependent on food availability and vegetative cover. Most mortality is from nestlings and fledglings than from adults. Some birds are attracted to burning areas as fire drives out insects however most birds are forced out of their habitat. Long-term viability of some species is dependent on the tendency to re-nest following fire. It is shown that burned areas have a lower abundance of species 1-2 years following a fire and reproductive success is lower than pre-fire years but recover 2-3 years later as food and vegetative cover increases.

Special consideration should be made to federal and state listed species. California Condors and Bald Eagles are historic to the mountains. There have been no current sightings of these species in the mountains. Brown Pelicans, Light-footed Clapper Rails, California Least Terns, and Western Snowy Plovers, and Belding's Savannah Sparrow are found primarily along coastal shore or marshes are unlikely affected by fire. Populations of Southwestern Willow Flycatchers and Least Bell Vireos can be negatively affected if fire destroys riparian habitat where they occur. There is no record of the California Gnatcatcher within the Santa Monica Mountains however removal of coastal sage scrub habitat via fire or vegetative conversion can negatively affect the population.

The following is more specific information on the requirements and potential fire effects for the various sensitive bird species:

### ***Aquatic Birds***

The following birds spend most of their life histories in or around water bodies (e.g. coasts, lakes). They are unlikely to be affected by any fire activity.

- Migrants and Vagrants

***Brachyramphus marmoratus*. Marbled Murrelet**

Federal Status: Threatened

State Status: Endangered

Park Status: Occasional Vagrant

- Winter Residents

***Pelecanus erythrorhynchos*. American White Pelican**

Federal Status: No Status

State Status: Species of Concern

Park Status: Rare (Winter) Resident

***Histrionicus histrionicus*. Harlequin Duck**

Federal Status: Species of Concern

State Status: Species of Concern

Park Status: Occasional (Winter) Resident

***Numenius americanus*. Long-billed Curlew**

Federal Status: No Status

State Status: Species of Concern

Park Status: Common (Winter) Resident

- Year-round Residents

***Pelecanus occidentalis californicus*. Brown Pelican**

Federal Status: Endangered

State Status: Endangered

Park Status: Abundant Resident

***Sterna elegans*. Elegant Tern**

Federal Status: Species of Concern

State Status: Species of Concern

Park Status: Common Resident

***Ixobrychus exilis hesperis*. Western Least Bittern**

Federal Status: Species of Concern

State Status: Species of Concern

Park Status: Occasional Resident

- Breeders

The following birds are known to breed within the recreation area (specifically Mugu Lagoon).

They may be affected by fire if their breeding habitat is disturbed or destroyed.

***Rallus longirostris levipes*. Light-footed Clapper Rail**

Federal Status: Endangered

State Status: Endangered  
Park Status: Rare Breeder

***Charadrius alexandrinus nivosus.* Western Snowy Plover**

Federal Status: Threatened  
State Status: Species of Concern  
Park Status: Uncommon Breeder

***Sterna antillarum browni.* California Least Tern**

Federal Status: Endangered  
State Status: Endangered  
Park Status: Uncommon Breeder

***Terrestrial Birds***

- Locally Extinct/Extirpated

***Gymnyps californicus.* California Condor**

Federal Status: Endangered  
State Status: Endangered  
Park Status: Historic (Occasional Breeder)

***Haliaeetus leucocephalus.* Bald Eagle**

Federal Status: Threatened  
State Status: Endangered  
Park Status: Occasional (Winter) Resident  
Bald Eagles usually migrate in the fall to the coast or large open water bodies for the winter. As an occasional winter resident here in the Santa Monica Mountains, it is unlikely affected by fire.

***Agelaius tricolor.* Tri-colored Blackbird**

Federal Status: Species of Concern  
State Status: Species of Concern  
Park Status: Rare Breeder

- Migrants and Vagrants

***Empidonax traillii extrimus.* Southwestern Flycatcher**

Federal Status: Endangered  
State Status: Endangered  
Park Status: Uncommon Migrant

***Riparia riparia.* Bank Swallow**

Federal Status: No Status  
State Status: Threatened  
Park Status: Occasional Migrant

***Vireo belli pusillus.* Least Bell's Vireo**

Federal Status: Endangered

State Status: Endangered

Park Status: Occasional Migrant

***Polioptila californica.* California Gnatcatcher**

Federal Status: Threatened

State Status: Species of Concern

Park Status: Unknown

Few individuals perish in fire, but populations within burn areas rapidly decline due to loss of habitat. Birds are absorbed into unburned areas on the periphery and unburned pockets are important refugia (Bontrager et al, 1995).

***Buteo swainsoni.* Swainson's Hawk**

Federal Status: No Status

State Status: Threatened

Park Status: Occasional Migrant

- Winter Residents

***Falco columbarius.* Merlin**

Federal Status: No Status

State Status: Species of Concern

Park Status: Uncommon (Winter) Resident

Merlins may be found in a wide variety of habitats during the winter, but being uncommon, they are unlikely to be affected by fire.

***Falco mexicanus.* Prairie Falcon**

Federal Status: No Status

State Status: Species of Concern

Park Status: Rare (Winter) Resident

As a rare winter resident, it is unlikely that Prairie Falcons will be affected by fire.

- Year-round Residents

Birds that are year-round residents can be affected by fire if prey resources are eliminated. The following birds are known breeders. Each is followed up with a description of their foraging grounds.

***Falco peregrinus.* Peregrine Falcon**

Federal Status: Endangered

State Status: Endangered

Park Status: Uncommon Resident

There are historical reports of Peregrine Falcons nesting along the cliff faces in the Santa Monica Mountains however current information suggests that they are no longer breeders within the mountains. As a resident, they may be affected by fire if there is a reduction in prey availability.

***Circus cyaneus.* Northern Harrier**

Federal Status: No Status

State Status: Species of Concern

Park Status: Common Resident

Northern Harriers forage over open grasslands within the mountains. Reduction of vegetative cover for prey may reduce food resources for this species.

***Pandion haliaetus.* Osprey**

Federal Status: No Status

State Status: Species of Concern

Park Status: Uncommon Resident

The foraging preferences of the Osprey make this species unlikely to be affected by fire.

- Breeders

Birds that are breeders in the mountains can be affected by fire if nesting habitat and prey resources are eliminated. The following birds are known breeders. Each is followed up with a description of their breeding and foraging grounds.

***Passerculus sandwichensis beldingi.* Belding's Savannah Sparrow**

Federal Status: Species of Concern

State Status: Endangered

Park Status: Common Breeder

Nesting occurs primarily in pickleweed habitat at the higher elevations of the salt marshes, above the reach of the highest spring tide (Mugu Lagoon).

***Oreortyx pictus.* Mountain Quail**

Federal Status: No Status

State Status: No Status

Park Status: Uncommon Breeder

Mountain Quail occur in chaparral, brushy ravines and mountain slopes. Species such as manzanita, whitethorn buckbrush and chamise from 18 inches to an optimal four to seven feet protects the birds from the elements and predators. Brush should cover approximately 30 percent to 60 percent of mountain quail habitat.

***Eremophila alpestris actia.* California Horned Lark**

Federal Status: No Status

State Status: Species of Concern

Park Status: Uncommon Breeder

When not flying, California Horned Larks move across the ground by walking. They live in grasslands and other sparsely vegetated habitat. Horned larks use grasses, rocks, and other elements of the terrain as cover from predators when feeding. Food typically consists of grass seeds and other plant matter. Insects, spiders, and snails are the main food source during the breeding season (Zeiner, D.C., et al., eds. 1990. California's Wildlife. 3 vols. Sacramento, California: Department of Fish and Game).

***Campylorhynchus brunneicapillus couesi.* San Diego (Coastal) Cactus Wren**

Federal Status: No Status

State Status: Species of Concern

Park Status: Uncommon Breeder

A sedentary resident, the Cactus Wren is associated with patches of cholla or prickly pear cactus in coastal sage scrub vegetation (Rea, Amadeo M. and Kenneth L.; Weaver, 1990. The taxonomy, distribution and status of the coastal California cactus wren. *Western Birds* 21(3):81-126). Most birds survive the direct effects of fire, but populations decline somewhat due to loss of cactus scrub habitat. Because cactus scrub is somewhat resistant to fire, populations declines within burn areas are not as severe as for birds restricted to woody shrub species. Unburned areas on the periphery do not absorb birds from within the burn area, but unburned patches within the fire perimeter are important refugia (Bontrager et al, 1995).

***Lanius ludovicianus.* Loggerhead Shrike**

Federal Status: Species of Concern

State Status: Species of Concern

Park Status: Rare Breeder

Loggerhead Shrike prey consists of various insects, lizards, mice, and birds. Insects such as bumblebees, dragonflies, grasshoppers, and crickets are preferred. Other prey items include crayfish and snails. Loggerhead Shrikes live in open, thinly wooded land or scrub savanna with clearings. Meadows, pastures, old orchards, and particularly osage orange hedges are often favored by these birds (Terres, J. K. 1982. The Audubon Society Encyclopedia of North American Birds. New York: Knopf).

***Aimophila ruficeps canescens.* Southern California Rufous-crowned Sparrow**

Federal Status: Species of Concern

State Status: Species of Concern

Park Status: Uncommon Breeder

Rufous-Crowned Sparrow occurs in sparse, mixed chaparral and coastal scrub habitats (especially coastal sage) and frequently found in open shrubland, open chaparral, and relatively steep, often rocky hillsides with grass and forb patches; also grassy slopes without shrubs, if rock outcrops are present. It forages on the ground in herbage and in litter beneath shrubs, gleaning from the ground and foliage; also gleans foliage of live oaks. It eats seeds, insects, spiders, grass and forb shoots. Nests are concealed on the ground at the base of shrubs. (Verner, J., and A. S. Boss. 1980. California wildlife and their habitats: Western Sierra Nevada. U.S. Dep. Agric., For. Serv., Berkeley. Gen. Tech. Rep. PSW-37. 439pp).

***Dendroica petechia.* Yellow Warbler**

Federal Status: No Status

State Status: No Status

Park Status: Rare Breeder

In southern California, Yellow Warblers typically nest in habitats with a dense understory vegetation (i.e. California Wild Rose (*Rosa californica*), various shrubby willows (*Salix spp.*) and Mulefat (*Baccharis salicifolia*)).

***Asio otus.* Long-eared Owl**

Federal Status: No Status

State Status: Species of Concern

Park Status: Rare Breeder

Long-eared Owls generally place their nests within woodland and riparian habitat found throughout the mountains as well as forage over open fields and grassland. Elimination of these habitats by fire may reduce the amount of available nesting sites and food resource availability.

***Athene cunicularia.* Burrowing Owl**

Federal Status: No Status

State Status: Species of Concern

Park Status: Rare Breeder

Burrowing Owls make their homes in the ground within the grassland habitats of the mountains. They are believed to be protected from the direct effects of fire in their burrows. Prey availability may be reduced if foraging habitat is eliminated by fire.

***Aquila chrysaetos.* Golden Eagle**

Federal Status: No Status

State Status: Species of Concern

Park Status: Uncommon Breeder

Locally uncommon but known to nest along cliffs within the mountains, Golden Eagles are unlikely to be affected by fire.

***Accipiter cooperii.* Cooper's Hawk**

Federal Status: No Status

State Status: Species of Concern

Park Status: Common Breeder

Considered a common breeder, elimination of riparian corridors by fire may reduce the Cooper's Hawks likelihood of foraging and nesting habitat within the Santa Monica Mountains.

***Reptiles, Amphibians and Fish***

There are 22 species of reptiles and amphibians within the Santa Monica Mountains regarded as threatened, endangered or of special concern by federal, state, and park agencies. Currently, an inventory is being completed to assess herpetofaunal diversity within the mountains and elimination of habitat by fire can negatively affect sensitive populations. Most species can escape fire by burrowing (e.g. turtles) or moving away from impacted areas. Mortality can occur in some snake species if they are in ecdysis (the process of shedding skin). Riparian zones and other moist areas favored by many amphibians are less likely to burn however increased sedimentation

and run off in burned areas following fire has been shown to reduce the amount of available breeding habitat for some amphibian species (Gamradt and Kats, 1997). The conversion of habitat by fire has the biggest effect on species diversity. Some burned areas show a high density of reptile species, especially those species typically found in open areas.

The following is more specific information on the requirements and potential fire effects for the various sensitive reptile, amphibian, and fish species:

- Reptiles

***Clemmys marmorata pallida.* Southwestern Pond Turtle**

Southwestern pond turtle is a semi-aquatic species commonly found in streams, ponds, lakes, and marshes, but also utilizes upland habitats seasonally. Effects due to fire would be the loss of riparian and adjacent upland vegetation, increasing water temperatures due to loss of canopy cover, and siltation of pools in stream channels.

***Phrynosoma coronatum.* San Diego Horned Lizard**

Horned lizard can be found in variety of habitats (coastal sage scrub, oak woodlands, chaparral, and grasslands). The limiting factors for these species are areas with loose sandy soils and an abundance of native ant species. Coast horned lizards like open microhabitats that may be created following fire events.

***Cnemidophorus tigris.* Coastal Western Whiptail**

Coastal Western Whiptail are common in the Santa Monica Mountains and prefer open habitats with shrub for cover nearby. Effects due to fire are unknown.

***Anniella pulchra pulchra.* Silvery Legless Lizard**

This species is a burrowing animal commonly associated with loose sandy loam soils and stabilized dune habitats. Although uncommon, this species has also been found in oak woodland sites, areas that provide dense vegetative ground cover, or under surface objects such as leaf litter, logs, and rocks. Impacts due to fire would be the loss of these cover habitats and increased solar exposure (higher ground temperatures) due to canopy loss.

***Diadophis punctatus modestus.* San Bernadino Ringneck Snake**

Ringneck snakes are infrequently found in coastal sage scrub, chaparral and grassland habitats in the Santa Monica Mountains. It is not known what the effects fires would have on these species, but these species are rarely found in the open and spend most of the time under logs and rocks, or in crevices.

***Lampropeltus zonata pulchra.* San Diego Mountain King Snake**

Mountain king snakes are infrequently found in riparian oak woodlands, and in narrow canyons with associated coastal sage scrub and chaparral habitats. Fire effects are not currently known, but loss in habitat would have an impact on the distribution of this species.

***Salvadora hexalepis virgulata.* Coast Patch-nosed Snake**

Coast patch-nose snakes are commonly found in the steep canyons of the Santa Monica Mountains and specifically associated with rocky outcrops. There are no known effects due to fire on this species.

***Thamnophis hammondi.* Two-striped Garter Snake**

Two-striped garter snakes are commonly seen in intermittent and perennial streams with rocky beds in the Santa Monica Mountains. Impacts on these species from fire would be siltation of stream habitats and loss of vegetative cover.

- Amphibians

***Bufo microscaphus californicus.* Arroyo Southwestern Toad**

There are no records of Arroyo southwestern toad in the Santa Monica Mountains.

***Rana aurora draytonii.* California Red-legged Frog**

Red-legged frogs have been extirpated from the Santa Monica Mountains. A small population was recently discovered in the eastern end of the Simi Hills and is in danger of extinction from urban encroachment. Fire effects on these species is the loss of riparian vegetation and canopy cover, and siltation of deep pools from sedimentation and erosion as a result of the loss of hillside vegetation.

***Taricha tarosa tarosa.* Coast Range Newt**

Newts are a commonly found species in steep rocky canyons and creeks in the Santa Monica Mountains. Although semi-aquatic during certain times of the year, newts do require upland habitats in which to hibernate during the fall and winter. There is one study in the Santa Monica Mountains of fire impacts on newts following the 1993 fires (Kirby and Kats, 1996). Although no decline in adults was observed, sedimentation of pool habitats reduced breeding habitat and breeding success.

- Fish

There are two federal endangered fish species in the Santa Monica Mountains, *Eucyclogobius newberryi* (tidewater goby) and *Oncorhynchus mykiss* (southern California steelhead trout). Tidewater gobies are strictly an estuarine species found in the lagoons of Malibu and Topanga. Steelhead trout are an anadromous species which return to Malibu, Topanga and Arroyo Sequit to spawn. Developing fry return to the ocean following large rain events that allow passage into the ocean where they mature for the next few years before returning to natal streams. Impacts of fires on these species would be impacts due to sedimentation of spawning sites.

## IV Natural Resources

### B Geology and Soils

#### *Geology*

##### Tectonic History

The transverse ranges have been formed as the result of compressive forces between the Pacific and North American tectonic plates. The Santa Monica Mountains are considered to be a large symmetrical anticline formed by north-south compression generated at the Big Bend of the San Andreas fault. The east-west orientation of the transverse ranges was created when the Transverse Ranges were rotated counter 90 degrees clockwise in the last 15 MYBP (Harden, 1998).

Tectonic forces are ongoing today and the transverse ranges are one of the most rapidly uplifting areas in the world. Movement along faults causing uplift of the Santa Monica Mountains have an average of 0.30 to 1.0 mm/year along the Malibu Coast and Santa Monica faults, respectively (<http://www.consrv.ca.gov/cgs/rghm/psha/ofr9608/index>). Quantum increases in elevation can occur during major earthquake events. For example the Santa Susana Mountains were raised 70 cm during the 1994 Northridge earthquake (Harden, 1998).

##### Erosion Cycle

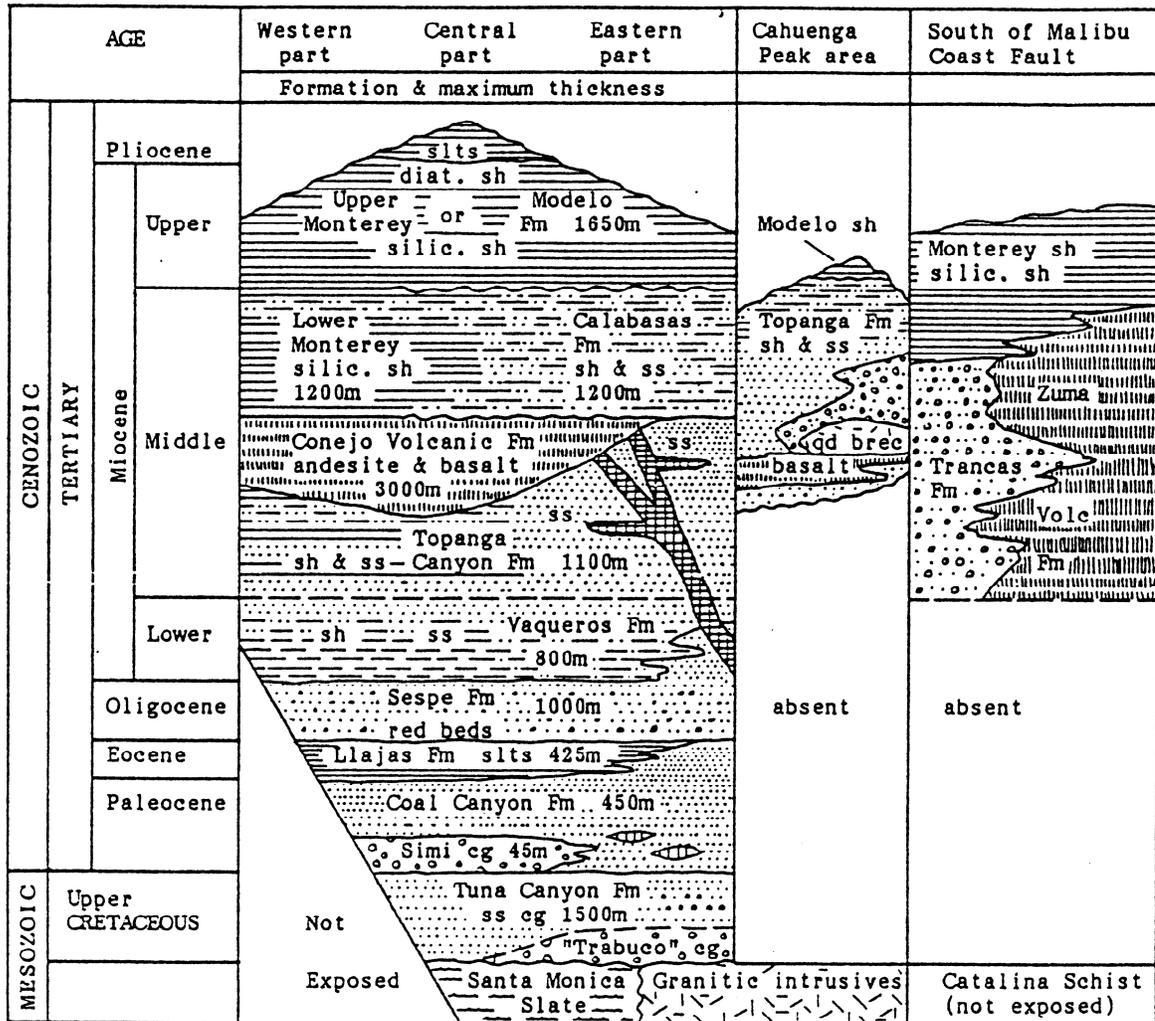
The Santa Monica Mountains are in the early to mid-maturity stage of the present erosion cycle, as indicated by its steep sided, V-shaped canyons and the sharpness of most of its ridges. However, there are also subdued, flattened ridges which indicate that the present erosion cycle was preceded by an earlier erosion cycle that reached late maturity stage when this range was reduced to low relief and was lower than it is now (Dibblee, 1982). Renewed uplift raised this range to its present height and is now causing it to undergo severe erosion in its present cycle. Numerous landslides on the southern slope and on high, steep, inland ridges (Yerkes et al, 1970; 1980) are indicative of rapid uplift. The lowland area north of the Santa Monica Mountains has been reduced to the late maturity stage of the present cycle as indicated by low rounded hills, floodplains along the parts of most canyons and by small valleys such as the Conejo Valley. The Simi Hills are in the midmaturity stage of the present erosion cycle.

##### Stratigraphy

The Santa Monica Mountains and their offshore extensions are the most geologically diverse of the mountain ranges within the transverse range province (Norris and Webb, 1990). The mountains are a complex assemblage of marine and non-marine sedimentary rocks, igneous intrusion and volcanic extrusive rocks. The topographical relief is the result of differential erosion and plate tectonics (e.g. uplifting, folding, and faulting). Geologic maps of the Santa Monica Mountains include Kew (1924), Hoots (1930), Durrell (1954), Truex and Hall (1969), Yerkes and Campbell (1980), Campbell et al. (1996), and the Dibblee Geological Foundation maps (1990-93). The location and associated time scale of the Santa Monica Mountains stratigraphy is

diagrammed in Figure 3-25. The following is a generalized discussion of the rocks from oldest to youngest.

Figure 3-25 Stratigraphy of the Santa Monica Mountains (From Raven et, 1986, P 8)



The Santa Monica Mountains have a granitic and metamorphic basement more similar to the Sierra Nevada than to the Franciscan basement rock of the Santa Ynez Mountains and coast ranges. The oldest rocks in the Santa Monica Mountains are the Santa Monica slates, a metamorphosed marine sedimentary rock of middle Mesozoic age (Raven et al., 1986). They comprise about a fourth of the surface area of the Santa Monica Mountains and are made up of slates and schists of fine grained mica that also include minute grains of quartz and feldspar. The slates make up the basement rocks for the western and central Santa Monica Mountains and are exposed extensively in the range, east of Topanga Canyon. In many places the slate has been altered to phyllite and fine grained schist by contact metamorphism induced by granitic intrusions (Raven et al., 1986).

Granitic intrusives were formed during the Mesozoic when igneous intrusions, similar to those that produced the massive granitic batholiths in the Sierra Nevada occurred (Norris and Webb, 1978). These granitic intrusions also formed the basement rocks of the eastern Santa Monica Mountains. They are exposed northwest of Hollywood and around Cahuenga Peak. They are primarily composed of highly weathered quartz diorite and granodiorite (Raven et al, 1986) suggesting that they formed over a subducting oceanic plate.

During and following the period of granitic intrusions, the slates were uplifted and then gradually eroded until the late Cretaceous. Locally, terrestrial rock formations exist which were deposited over the eroded slates indicating erosion was sub-aerial (above sea level). Subsequently the sea again covered the majority of the land and a period of continuous deposition began as the spreading sea deposited conglomerates, sandstone and shale. The late Cretaceous, thin Trabuco formation (found in the eastern portion of the mountains) represents non-marine deposition, consisting primarily of clayey conglomerates. The marine Tuna Canyon formation includes deposits of turbidites (marine sandstone), slate, siltstone and conglomerates. This fossiliferous formation contains foraminifera, mollusks and ammonites.

It is possible that the non-marine Simi Conglomerate, found in the western portion of the mountains also has a late Cretaceous age, but current literature suggests an early Paleocene age. It represents a basal conglomerate overlying late Cretaceous rocks. The Simi Conglomerate indicates the processes of primary uplift, erosion of elevated formations, and marine deposition continued during the Cenozoic era (65MYBP- present).

The marine Coal Canyon formation is among the earliest formations from this era and represents a period of extensive marine deposition during the Paleocene and possibly earliest Eocene (65-38 MYBP) that resulted in marine shale, conglomerate, sandstone, siltstone, and limestone. These sediments accumulated to a maximum thickness of 8,500 feet. Some fossils, characterized by the gastropod *Turritella pachecoensis*, occur in the Coal Canyon formation.

The marine Llajas formation formed during the Eocene above the Coal Canyon formation in the western and central portions of the mountains. It consists of sandstone, pebbly conglomerate and fine grained shaly siltstones and mudstones.

From the late Eocene to the early Miocene (36-24 MYBP), portions of the Santa Monica Mountains were again above sea level and terrestrial floodplain deposits of up to 3,500 feet deep were formed. This distinctive Sespe formation consists commonly of "red-beds," of sandstone, mudstone, and conglomerates. The flood plain discharged into a shallow marine basin. As sea level fluctuated, the Sespe formation interfingered with the marine Vaqueros Formation which was deposited in an adjacent shallow sea. This condition persisted until the upper Oligocene (23 MYBP), when sea level began to rise, submerging the site of the present Santa Monica Mountains. At this time changes also began in the Pacific and North American plate movements from convergent to right lateral shear which caused a shift in the topography of southern California from a marine shelf adjacent to a subduction zone, to the ridges and basins present today (Vedder and Howell, 1980).

Throughout the lower to middle Miocene (24-13 MYBP), thick sedimentary deposits accumulated in the marine and non-marine basins forming the Vaqueros formation and Topanga Group of rocks. The Vaqueros Formation consists of near shore sandstones and deeper water (up to 200 meters) siltstones. The Topanga Group consists of non-marine sandstones and mudstones of the Topanga Canyon Formation overlain by volcanic rocks of the Conejo Volcanics which in turn are overlain and interfingering with siltstones and sandstones of the Calabasas Formation. During the middle Miocene there was a period of massive volcanic activity in the region of what is currently the western Santa Monica Mountains that interrupted and co-existed with the sedimentary phase. Intrusive and extrusive volcanic activity also occurred in the region of the eastern portion of the range. These Conejo Volcanics are composed of alternating layers of andesitic and basaltic flow-breccias, agglomerates, mudflow-breccias, flows, pillow-breccia and aquagene tuffs indicating that much of the erupting lava was submarine (Raven, Thompson and Prigge, 1986 from Yerkes and Campbell, 1979). The Conejo Volcanics are exposed extensively in the western part of the Mountains, but exist only in a few locations east of Topanga Canyon.

The sandstone, siltstone and sedimentary breccias of the Calabasas formation were deposited in the late-middle Miocene in the same basins and at the same time as the later Conejo Volcanics. As a consequence, volcanic and sedimentary rocks are often interbedded.

Following deposition of the Topanga Group, the basins continued to develop with deep water sediments deposited in the late Miocene. An additional 4500 feet of marine diatomite, shale, sandstone, chert and basal conglomerate were deposited to create the Modelo formation. These episodes during the late Miocene represented some of the greatest encroachment of the sea in the vicinity of Ventura and Los Angeles.

The stratigraphy of the area south of the Malibu coast fault differs from the rest of the Santa Monica Mountains (Yerkes and Campbell, 1979). This area includes the coast west of Carbon Canyon and east of Nicholas Canyon. The Trancas formation and Zuma Volcanics are middle Miocene formations that were apparently deposited in a separate basin from rocks north of the fault, but are generally similar in age to the Calabasas Formation and Conejo Volcanics. These formations occur here but do not occur in the rest of the range. These unique formations are overlain by the widespread Monterey formation. The Trancas formation is a mixture of sedimentary marine rocks, including sandstone, mudstone, and claystone. A member of the Trancas formation, locally called the San Onofre Breccia is well exposed at Lachusa Point and surrounding Broadbeach area. The Zuma Volcanics consists of basaltic and andesitic flows, breccias, pillow lavas, mudflow breccias and aquagene tuffs.

The Monterey formation is named for outcrops in Monterey County, but are also well exposed along the coast south of Monterey to Palos Verdes Peninsula. They consist of blond to white colored, thinly bedded diatomaceous to clayey shales with interbedded sandstone. Although local school children call the diatomaceous shales “chalk rock,” it is actually formed of microorganisms with silica skeletons rather than calcium carbonate.

Beginning in the late Pliocene (5-1.8 MYBP), the Santa Monica Mountains began to be uplifted. Their present form is the result of ongoing uplift and erosion (Dibblee, 1982). At this time the rocks that form the Santa Monica Mountains were within a chain of islands within a Pliocene sea located at the latitude of Baja, California. Vedder and Howell (1980) estimated that the Pliocene ocean basin was nearly 4900 feet deep at the western end of what is currently the mountain range (Ventura) and up to 8200 feet deep near southeastern end of the range (Los Angeles). Thick beds of shale, sandstone and clay continued to accumulate. The Pico formation, characteristic of this period, has a maximum thickness of about 1000 feet. In the Pacific Palisades, where deep canyons have been cut through the thick Pleistocene alluvium, Pliocene rocks – soft claystone, siltstone and sandstone – are exposed (Raven et al., 1986).

In the early Quaternary, the range was re-elevated and the area has remained in a dynamic erosional-uplift cycle. This cycle has resulted in extensive alluvial fan deposits surrounding the Santa Monica Mountains in the Los Angeles Basin, San Fernando Valley and Oxnard Plain and fluvial sand and gravel deposits along major stream courses. On the south side of the mountains, remnant sandy marine terraces at Malibu Creek and Point Dume represent former shorelines. Three marine terraces are recognized in the range and from oldest to youngest are the Corral, Dume, and Malibu terraces. Uplift of the Santa Monica Mountains continues today at the rate of 0.3mm per year based on Marine terrace elevations. Uplift occurs as a direct result of plate tectonic compression, manifested as the numerous small and occasional large earthquakes felt in southern California. Erosive processes (e.g. landslides, gullying, debris flows, etc.) are the converse result of this rapid uplift.

## *Soils*

### Soil Classification

Ten general soil associations and consociations have been mapped in the Santa Monica Mountains by the Natural Resources Conservation Service (National Resource Conservation Service, in preparation). These include the following:

#### General Soil Map Units

- |   |               |
|---|---------------|
| 1) Camarillo-Pacheco-Sulfic Fluvaquents Association | 0-2% slopes   |
| 2) Chumash-Boades-Malibu Association                | 30-75% slopes |
| 3) Cotharin-Talepop-Rock Outcrop Complex            | 30-75% slopes |
| 4) Mipolomol-Topanga Association                    | 30-75% slopes |
| 5) Zumaridge-Sumiwawa-Rock Outcrop Association      | 30-75% slopes |
| 6) Linne-Los Osos-Gaviota                           | 30-75% slopes |
| 7) Cropley-Urban Land Complex                       | 0-15% slopes  |
| 8) Balcom-Xerorthents-Gazos Complex                 | 2-75 % slopes |

- |   |             |
|---|-------------|
| 9) Cumulic Haploxerolls-Fluvaquents Association | 0-9% slopes |
| 10) Urbanland-Xerorthents, Landscaped Complex   | 0-9% slopes |

These soil groupings can be identified by the geomorphic areas in which they occur. The first geomorphic grouping, corresponding to soil unit 1, is the outwash plain of Calleguas Creek, which occurs in the extreme western area of the park near Point Mugu Naval Air Station. These generally are level, somewhat poorly to poorly drained soils that formed in alluvium from mixed rock sources. These areas are currently in the tidal floodplain of Mugu Lagoon or are in use as a military facility.

The second geomorphic grouping includes the drainages and axial stream floodplains within the mountains themselves. This grouping corresponds to soil unit number 9. These are gently sloping, moderately well to well-drained soils that formed in alluvium, residuum and colluvium from sedimentary rock sources and/or basic igneous rock sources.

The third geomorphic grouping is the basic igneous hills and mountains such as Sandstone Peak. This grouping corresponds to soil unit number 3. These are moderately sloping to very steeply sloping, well-drained soils that formed in residuum and colluvium from basic igneous rock sources.

The fourth geomorphic grouping is the non-marine sedimentary shale and sandstone hills and mountains such as Castro Peak and Laguna Peak (soil unit numbers 2, 4 and 5). These are moderately sloping to very steeply sloping, well-drained soils that formed in residuum and colluvium from shale and sandstone.

The fifth geomorphic grouping is the marine sedimentary shale and sandstone hills, such as the Simi Hills. This grouping corresponds to soil unit numbers 6 and 8. These are moderately sloping to steeply sloping, well-drained soils that formed in residuum and colluvium from marine sediments.

The sixth geomorphic grouping is the Malibu Plain and other ocean terraces and alluvial fans adjacent to the ocean. This grouping corresponds to soil unit number 7. These are the gently to moderately sloping, well-drained soils that formed in alluvium from mixed rock sources.

The last soil unit, number 10, includes urban areas, golf courses, landscaped areas and is comprised of houses and adjacent landscaped areas.

Previous soil information for the Santa Monica Mountains includes data completed by the Ventura County Soil Survey (SCS, 1970). This survey identified and mapped the following 14 soil associations:

- 1) Pico-Metz-Anacapa
- 2) Mocho-Sorrento-Garretson
- 3) Camarillo-Hueneme-Pacheco

- 4) Riverwash-Sandy Alluvial-Coastal Beaches
- 5) Rincon-Huerhuero-Azule
- 6) Ojai-Sorrento, Heavy Variant
- 7) San Benito-Nacimiento-Linne
- 8) Castaic-Balcom-Saugus
- 9) Calleguas-Arnold
- 10) Gazos-Santa Lucia
- 11) Millsholm-Malibu-Los Osos
- 12) Sespe-Lodo
- 13) Sedimentary Rock Land-Gaviota
- 14) Hambright-Igneous Rock Land-Gilroy

Soils 1 through 4 can be classified as having moderate to level slopes, excessively to poorly drained soils on alluvial fans, plains and basins. They are primarily derived from sedimentary rocks and to a lesser extent from basic igneous rocks. Annual grasses, forbs, brush, and scattered oak trees are their dominant vegetation. In the Santa Monica Mountains, Hidden Valley soils match these characteristics.

Soils 5 and 6 can be described as being located on level to moderately steep slopes and being well drained to moderately well drained. Most of these soils formed from alluvium derived from sedimentary rocks on old terraces. A few derive from alluvial fans. Soils from association number 5 can be found in the Simi Hills portion of the SMMNRA.

Soils 7 through 14 make up most of the rest of the Santa Monica Mountains and Simi Hills. These soils can be classified as being found on moderate to very steep slopes and are well drained to excessively drained upland soils. They may be shallow to very deep over somewhat consolidated sediments, sandstone, shale or basic igneous rocks.

The following additional soil associations were mapped in Los Angeles County and constituted the remaining portions of the Santa Monica Mountains (SCS, 1969):

- 10) Oceano
- 24) Perkins-Rincon
- 27) Gaviota-Millsholm
- 28) Hambright-Gilroy
- 34) Diablo-Altamont
- 35) Altamont-Diablo

36) San Andreas-San Benito

42) Rock Land-Rough Broken Land

Soils of the Oceano Association occur on nearly level slopes, and are excessively drained and wind eroded. They are derived from wind-blown sands and have a thin surface layer (accumulation of organic matter). In the Santa Monica Mountains, these soils are found at the tip of Point Dume.

Soils of Perkins-Rincon Association have zero to 15 percent slopes, are well drained and are located on terraces to 500 feet. They occur along the Pacific Coast Highway from Leo Carrillo State Beach to Trancas Canyon.

Soils of the Gaviota-Millsholm Association occur on steep mountainous upland terrain from 100 to 3500 feet. They are somewhat excessively drained and are derived from shattered shale or fine-grained sandstone. In the Santa Monica Mountains, they occur in a band from Leo Carrillo State Beach north to Castro Crest and south to Las Virgenes and then spread out toward Topanga Canyon Road. East of Topanga Canyon, they are found in a band that includes the peaks stretching toward San Vicente Mountain and Interstate 405 south of the Encino Reservoir.

The Hambright-Gilroy Association makes up the greatest portion of Los Angeles County within the Santa Monica Mountains. These soils have 15 to 50 percent slopes, are well drained and are derived from basic igneous rock. They extend through the middle portion of the Santa Monica Mountains from the Ventura County line through Saddle Peak eastwards and occur in pockets along Topanga Canyon and Corral Canyon.

Soils of the Diablo-Altamont Association occur on rolling foothills, and are relatively deep and well drained. These soils are derived from strongly calcareous shale. In the Santa Monica Mountains, they occur beyond the tip of Point Dume.

Soils of the Altamont-Diablo Association have steep eroded slopes and, as a result, compared to those of the Diablo-Altamont Association have reduced depth and water-holding capacity. In the Santa Monica Mountains, they occur north of Highway 101 along the Ventura County line and north of the reverse association above Point Dume.

The San Andreas-San Benito Association soils occur on steep to very steep mountainous terrain up to 1500 feet. They are somewhat deep, well-drained and are derived from sandstone. In the Santa Monica Mountains, they occur from Topanga Canyon Road east to Interstate 405, except where the band of Gaviota-Millsholm soils occurs along the peaks.

Rock Land-Rough Broken Land occurs on strongly sloping to steep mountainous upland. This miscellaneous association is characterized by very shallow soils and rocky outcrops that cover 50 to 90 percent of the area. In the Santa Monica Mountains this association occurs at Brents Mountain in Malibu Creek State Park and other rocky areas near the Ventura County line and at Topanga Lookout.

## Soil movement

The Santa Monica Mountains are naturally prone to landslides due to an unstable combination of rapid uplift, steep slopes and often poorly cemented sedimentary rock. In general, the more rapid the uplift in an area, the greater the gravitational forces that trigger earth movements (landslides and erosion). Mass wasting through landsliding and erosion are necessary to keep up with tectonic uplift; soil erosion, landsliding, and debris flows/debris torrents are normal and necessary processes in tectonically active areas of the world. These events can not be stopped and have created the habitable landscape features of the Santa Monica Mountains and the surrounding Ventura and Los Angeles basins (Spittler, 1995).

The erosional process moves sediment from hillside slopes to stream channels and ultimately to the ocean. Sediment from hillsides moves into stream channels through the processes of debris avalanches (hillside debris flows), dry flows (dry ravel), and sheet and rill erosion. Sediments in stream channels can be transported as suspended loads, bed loads, or as debris torrents (channel debris flows) (Spittler, 1995). Destructive debris avalanches are created by soil slips or by progressive sediment bulking of surface runoff by dry ravel materials accumulated in steeply inclined U- or V-shaped topographic depressions on hillsides.

In the Santa Monica Mountains, hillslope erosion is primarily a result of surface runoff and particle entrainment during and immediately after precipitation events and secondarily of dry ravel between winter precipitation events and during the long dry summers. Debris flows occur when rains are intense, frequent and persistent and can quickly provide abundant sediment to stream channels, transforming normal floods to mudflows (Campbell, 1975). The rate of erosion is a combined function of precipitation, slope, aspect, vegetation and soil type (Orme et al., 2002). Soil movement in the form of rockfalls and deep-seated landslides can occur many days or weeks after rainfall events and is more related to the nature of the underlying geological formation.

### ***Fire Effects on Soil Movement***

Vegetation provides slope stability and reduces erosion through interception of rainfall, litter, structural support of loose material, roots that reinforce the soil, and soil communities that create soil structure (Spittler, 1995). Vegetated slopes have high rates of infiltration and very little overland flow. When vegetation is removed through fire, erosion increases, peak flows in channels occur more rapidly, and the flood peaks are higher. The amount and form of post-fire erosion varies dramatically depending on the seasonal timing, duration and intensity of precipitation in the first three years following fire. The amount of erosion is also related to percentage of watersheds burned and the intensity of the fire.

### ***Hillslope erosion***

Following the 1993 Old Topanga and Green Meadow fires, localized hillslope erosion rates were monitored with .5 m<sup>2</sup> plots at burned and unburned sites (Orme et al., 1996). The total amount of erosion was determined to be a complex function of precipitation amount and precipitation intensity or duration. A geomorphic threshold was identified where erosion increased more rapidly above 18 degrees slope angle with increases in precipitation. Moister north-facing and more

exposed west-facing slopes tended to have higher rates of erosion. Post fire dry ravel was a significant component of the total sediment yield.

The overall erosion pattern seen on burned hillsides was significantly influenced by the rainfall patterns that occurred in the 3 years following the fires. The rainfall was less than average in the first year post-fire, very high in the second year post-fire and average in the third year post-fire. Low intensity, gentle-moderate rains fell in November-January, which favored infiltration versus overland flows, germinated cover, and allowed resprouting prior to more intense February-March rainfall. No rills were observed on burned slopes until the moderate storms of February-March, when sheetflow and rill formation was observed in burned areas but not the unburned areas. Year-1 initial erosion from burned sites was 25-50 times the rate on unburned sites following moderate to heavy storms. In year-2, the erosion rates decreased to 10 times the control site in very heavy rains and in year-3, the erosion rates were only twice the control rate. The cumulative erosion rates over the three year period show the expected peak of increased erosion in the first year; in the second year vegetation has not sufficiently recovered to prevent erosion with the severe storms of that year and the total erosion increased to 1.5 times the amount generated in the first year; in year-3, despite storms of greater intensity than in the first year, total erosion decreased to  $\frac{1}{3}$  the amount generated in the first year (Orme et al., 1996).

Clearly the erosion yield from any burned area is dependent on a complex interaction between an unpredictable rainfall pattern and vegetation recovery. The underlying soil type is also a primary determinant of erosion yield both as it affects intrinsic soil erosion rates and vegetation productivity and recovery rates. Unlike the sites that had largely recovered within 3 years post-fire, very high erosion rates ( $4 - 14 \text{ g/m}^2/\text{day}$  following precipitation events) were still observed seven years after the 1993 fire in the Red Rock area of Topanga on steep north and west facing slopes underlain by coarse clastic sediment (Orme et al., 2002).

Fire severity also affects the amount of sediment delivered to stream channels through erosion. Riggan et al. (1994) reported that moderately burned watersheds discharged  $\frac{3}{8}$  the amount of sediment of severely burned watersheds.

### ***Debris flows***

Four types of debris flows occur in the Santa Monica Mountains following fires: soil slips, progressive sediment bulking of surface runoff by dry ravel materials, mobilization of materials from pre-existing landslides, and road cut failure. Soil slip debris flows occur more often in areas underlain by igneous rock than in areas of sedimentary rock. Both sediment bulking and soil slip triggered debris flows occur in areas of sedimentary rock. Most post-fire debris flows are in 0- and 1st -order drainages (Menitove et al., 1999).

Southern California post-fire debris flows have been classified into two types based analysis of 86 drainages following fires in 1997 (Cannon, 1999). Type-1 debris flows have high discharges, consist of poorly sorted, up to boulder size materials, and are highly destructive. They most commonly occur in drainages underlain with sedimentary rocks, and are generated from drainages 5-10 degrees steeper than drainages that produce only stream flow. Type-1 debris

flows are initiated by progressive sediment bulking of surface runoff, but also by debris from soil-slips. Most occur in watersheds without a water repellent hydrophobic layer which therefore allows greater water infiltration. Type-2 debris flows consist of unsorted sand and gravel sized material in an abundant, organically rich matrix and are produced in drainages underlain by crystalline rocks. They generally transport smaller material, inundate smaller areas, and are less destructive than Type-1 flows. The Type-2 debris flows are associated with soil slip failures on hill slopes and are more often produced from drainages having a water repellent soil layer. Post-fire debris flows are most commonly the first response to storms, followed by more dilute flows in the same event. In this study, no debris flows were produced from burned watersheds following the initial erosive event.

Areas that are potentially susceptible to hazardous Type-1 post-fire debris flows can be identified on the basis of bedrock materials, slope, fire intensity, soil hydrophobicity, and analysis of alluvial fan materials at the mouths of creeks (Spittler, 1995). The threshold precipitation values required to generate post-fire debris flows have been reported to be on the order of 1.5-2.0 mm rain/5 min (Riggan et al., 1994).

Mass movement from soil slips also occurs in the Santa Monica Mountains in unburned watersheds. In the absence of fire, mass movement occurs as soil slips that transform downslope to debris flows especially on grass dominated slopes underlain by mudstone or claystone. The threshold values include slopes greater than 20 degrees, total storm precipitation exceeding 300 mm (12") and sustained intensities exceeding 25mm/hr (1"/hr) (Raphael et al., 1995; Campbell, 1975). Soil slips are seven times as likely to occur on grass-converted slopes than on shrub dominated slopes (Rice et al., 1969).

#### ***Channel effects: flooding***

Following fire, the water storage capacity of the soil mantle is reduced by 20 times or more (Wells, 1981). With rainfall, peak flows in channels occur more rapidly than in unburned watersheds and the flood peaks are higher. This reduces the size of the storm necessary to surpass the critical stream power necessary to mobilize stored sediment and create debris torrents. A forty fold increase in sediment production can occur during the first storm season following a fire if high intensity rainfall occurs (Bruinton, 1982). The sediment from debris flows to stream channels can transform normal floods into non-Newtonian (Bingham) flows.

Debris flows commonly exceed the levels of predicted floods because they have up to 2.5 times the volume of floods consisting of water alone, and they tend to drop sediment in critical locations such as culverts, buildings, stream channels and roads. Federal Insurance Management Plan (FIRM) floodplain maps do not take into account debris flows, which can exceed the elevations of water-based flows and can rapidly change channel geometry. However, the Los Angeles County Department of Public Works, in its Hydrology and Sedimentation Manuals, 1991, identifies the soil types and debris and sedimentation formation relative to the rainfall zone that can calculate storm flows in various watersheds.

### ***Channel effects: sediment transfer and stream morphology***

Watersheds in the Santa Monica Mountains comprise a spatial system within which an erosional–depositional cascade erodes sediment from hillsides and then moves it to stream tributaries, then to the mainstream and eventually to the ocean. Sediment is normally transported through the stream channel in episodic periods of erosion and deposition starting with steeper slopes then moving to lower gradient stream reaches, immediately downstream. Sediment moves rapidly through steep lower mainstem reaches, and is rarely deposited until it reaches gentler gradients immediately before and at the stream mouth. There are frequent opportunities for storage within the system and sediment rarely reaches a tributary in one event unless debris flows occur (Orme et al., 2002).

The size and quantity of channel sediments that can be transported increases as the volume and velocity of the stream flow increases. If high intensity storms occur in burned watersheds where the critical power of the stream exceeds that needed to mobilize the sediment stored in it, the sediment is mobilized as debris torrents. Debris torrents form a thick slurry of water, soil and rock. With water content of about 450%, these debris flows have tremendous weight, and are so viscous that they can carry boulders several feet in diameter. However, moderate storms are more common than high intensity storms and normal fluvial transport of stored sediments is more likely to occur than large magnitude, high intensity debris torrents (Florsheim et al., 1991). When convergence of high intensity storms on fire or vegetation converted slopes does occur however, exceptional mass movement takes place. These dramatic events create extraordinary stream discharge rates and sediment yields and lead to exceptional channel geometry changes (Orme and Bailey, 1971).

### ***Post-fire erosion control measures***

Post fire seeding is not effective on steep chaparral hill slopes where the timing, energy and magnitude of the soil movement processes will overcome any resistive power of germinating non-native grass seeds. For major storms in the first season following a fire, grass seeding will not reduce flood peaks and will have no effect on dry ravel or sediment from stored channel alluvium. There is some limited possibility that grass seed might reduce rilling if the seed were to germinate and grow in time to provide adequate cover and if the resistance power of grass were to exceed the erosive power of rill formation. However, Keeley (1998) has shown that cover from post-fire native vegetation far exceeds that from aerial seeding of non-native seed mixes, and native regeneration therefore provides much more effective erosion control than application of non-native seed mixes.

## **Soil Nutrient Cycling**

### ***Chaparral***

Chaparral soils are typically nutrient deficient, particularly in nitrogen, and limit plant productivity (Rundel, 1986; Christensen, 1994). Foliar leaching of nitrate and atmospheric deposition may provide a nutrient pulse following the first winter rain. In the absence of fire, litter fall is the most important means of returning nutrients to the soil (Gray and Schlesinger, 1981). Litterfall is concentrated in the summer and is relatively rapid (Schlesinger and Hasey, 1981). Presumably in response to the selective pressure of nitrogen limited soils, a number of chaparral shrubs have nitrogen fixing symbiosis, e.g., *Ceanothus spp.*, *Myrica spp.*, *Lotus scoparius*, *Cercocarpus betuloides*, and *Pickeringia montana*.

As a powerful and instantaneous modifier of the environment, fire can change the form, distribution and amounts of nutrients (Wan et al., 2001). Fire recycles nutrients tied up in plant matter, therefore, soil levels of most nutrients increase after fire (Christensen and Muller, 1975). Fire increases soil  $\text{NH}_4^+$  and  $\text{NO}_3^-$ . The increase in  $\text{NH}_4^+$  is highest immediately after the fire and decreases asymptotically to pre-fire levels over time. The increase in  $\text{NO}_3^-$  is small immediately after fire, but peaks 7-12 months after fire, and decreases to pre-fire levels within 5 years (Wan et al., 2001).

It is widely accepted that fire decreases the total nutrient pool due to post-fire runoff and volatilization of nitrogenous compounds in plant material and soil organic matter (DeBano and Conrad, 1978; Keeley, 2000). It is estimated that nitrogen losses from volatilization are on the order of 6kg/Mg of fuel consumed (Christensen, 1994) which is directly related to the temperature or intensity of the fire (DeBano and Conrad, 1977). Nitrogen losses from a moderate intensity fire in chaparral would be 133-178 lbs nitrogen/acre (Rundel, 1986). These amounts are small relative to the total soil nitrogen pool. For example, fire induced nitrogen loss of 65kg/ha in Arizona chaparral accounts for 5% of the total 1300kg N/ha in the upper soil layer (0-10 cm) (DeBano et al., 1998). The long-term effects of fire variables such as frequency and intensity on chaparral ecosystem nitrogen is not known.

Nitrogen replenishment from normal atmospheric inputs from dry and wet deposition are on the order of magnitude of <10lbs/10,000 sq. miles /year (Rundel, 1986). This amount is clearly inadequate to replace the amount of nitrogen lost to fire volatilization. Although fire reduces total nitrogen pool, post-fire conditions are favorable for growth because a larger amount of inorganic nitrogen is available that can be used directly by plants. The flush of post-fire ephemerals immobilizes and stores a large pool of nitrogen that could be lost through erosion or leaching. Symbiotic nitrogen fixation by shrubs and herbaceous legumes provides critical replacement of the nitrogen pools in the early years following fire (Rundel, 1986; Christensen, 1994). In urban areas of southern California nitrogen inputs to adjoining wildland areas from pollution sources are estimated to be ten times natural levels (Rundel, 1986). This has potentially significant long-term effects on the nitrogen cycle and the chaparral ecosystem.

It is unlikely that the site degradation and vegetation conversion that has been observed in chaparral stands with high fire frequencies is due to loss of soil nutrients from fire. Annual grasses typical of degraded or type converted habitats require soils with relatively high nutrient levels and are competitively excluded where nutrients are bound up in well-established native vegetation or where sites are naturally low in nutrients. Type conversion is better explained as the demographic consequence of obligate seeding species' failure to recruit under a short fire-return interval than as a soil nutrient phenomenon. Nor do old stands of chaparral become unproductive due to nutrient limitations (Schlesinger et al., 1982; Keeley, 2000). Studies of plant growth that have compared stands a decade or two after fire with stands nearly a century old have repeatedly failed to find any evidence of declining productivity (Keeley, 2000).

### ***Riparian woodlands and shrublands***

The riparian zone is not nutrient limited (Faber et al., 1989). Nutrients from coastal sage scrub

and chaparral on upland slopes are carried by streams and accumulate on floodplains, banks, and coastal wetlands. One riparian species, *Alnus rhombifolia*, also has the ability to fix atmospheric nitrogen. Following fire, non-wetable charcoal and ash carried in overland and stream flows, settle and remain in sediment deposits, available for use in plant growth. Riparian corridors provide a unique function in nutrient cycling to link nutrients between upland areas and downstream plant communities (Faber et al., 1989).

### Fire effects on soils

The effect of fire on soil depends upon the type of soil (i.e., its chemical and structural properties), the moisture content of the soil, the type and total biomass of the vegetation growing on the soil, as well as the temperature and duration of the fire passing over the soil. Soil heating during fire depends on fire intensity and duration and the amount of moisture in the soil. In general, the direct effects of soil heating are limited to the upper 2-3 cm of soil (DeBano et al., 1979). In areas of extensive fuel accumulation, smoldering fires can heat the soil to 10-20 cm resulting in considerable chemical change and soil sterilization. Except where soil heating is extreme, physical changes in physical features such as texture or mineralogy are negligible. The extent of soil organic mineral loss is directly related to fire intensity. Fire alters the hydrologic properties of soils in chaparral. Soils in chaparral accumulate organic hydrophobic compounds in the soil layer during interfire years. The heat of the fire distills the hydrophobic compounds down through the soil profile, creating a hydrophobic seal with a wettable layer, 1-5 cm thick, overlying a water repellent soil layer. The hydrophobic layer potentially creates conditions for sheet erosion above the hydrophobic seal (Christensen, 1994). It has been reported that the hydrophobic layer rapidly breaks down after fire due to gopher and ant activity which creates conduits for surface water through the repellent layer (Spittler, 1995).

## IV Natural Resources

### C Water Resources/Wetlands

The coastal Santa Monica Mountains include both fresh water and marine water resources. Because of the dry Mediterranean climate of southern California, fresh water resources are both spatially and seasonally limited, and are therefore especially valuable. In addition to water quality, other important values associated with water resources are plant and wildlife habitat, and recreational opportunities.

The largest watershed located completely within the Santa Monica Mountains Zone is the Malibu Creek watershed. It is 105 square miles and contains a total of 225 stream segments within six major drainages (Medea Creek, Triunfo Creek, Cold Creek, Malibu Creek, Las Virgenes Canyon, and Potrero Valley). The Malibu Creek watershed drains the north slopes of the Santa Monica Mountains, the south slopes of the Simi Hills, the interior valleys between the two ranges, and the Malibu Canyon drainage. The remainder of the Santa Monica Mountains watersheds (17%), are a series of parallel, north-south canyons that drain the southern slopes of the mountains. Each of the major north-south canyons has a stream with associated riparian

vegetation lining it. In addition, there are a large number of east-west trending drainages on the slopes of these canyons. Figure 3-3, on page 3-6, shows the streams and watershed boundaries within the SMMNRA.

Most streams in the Santa Monica Mountains are typically intermittent (seasonally flowing) streams. This is particularly the case in watersheds on the south facing slopes of the Santa Monica Mountains, where steep gradient canyons flow directly into the Santa Monica Bay. There are only a few exceptions in which year round flows occur: Solstice Canyon (which is perennial due to geological formations and tectonic forces that push the water table to the surface), and larger watersheds such as Topanga and Malibu Canyons. These steep gradient canyons, although seasonal are not completely dry. In many canyons where the stream channel meets bedrock, small pool habitats are formed. Even in drought years (year 2002) there are sites where water percolates to the surface. These areas are ideal places for amphibious and aquatic life. Many of the semi-aquatic amphibians, *Hyla regilla*, *Hyla cadaverina*, and *Taricha tarosa* (California species of special concern) breed in these habitats.

In the larger watersheds (Arroyo Sequit, Topanga, and Malibu Canyons) pool habitats are also areas in which developing southern steelhead, *Oncorhynchus mykiss* (federally threatened) fry take refuge until fall and winter rain events allow for an opportunity to disperse into the ocean. Malibu and Topanga Canyons are particularly valuable in that they are perennial and provide habitat for breeding adults as well. The arroyo chub, *Gila orcutti* (species of special concern), is also found in Malibu Creek. The only other perennial flowing creek is Solstice Creek and the National Park Service is currently working on the removal and modifications of in-stream barriers to allow for re-establishment of steelhead populations.

A high diversity of wildlife and plant species is associated with the streams of the Santa Monica Mountains. In addition to the amphibians and fish discussed above, the fresh water springs, seeps and surface waters are necessary for a diverse array of aquatic insects, reptiles, birds, rodents, and large mammals. These include the southwestern pond turtle, California slender salamander, California newt, Monterey ensatina, arboreal salamander, California toad and Pacific tree frog. The mammalian wildlife, which requires the fresh water for drinking includes carnivores such as mountain lions and bobcats, as well as coyotes and deer.

Although riparian plant communities make up less than 1% of the area of the Santa Monica Mountains, 20% of the total flora is found in these stream-associated habitats (Rundel, 1998). Riparian corridors include sycamores (*Platanus racemosa*), oaks (*Quercus agrifolia*), remnant populations of big leaf maples (*Acer macrophyllum*), cottonwoods (*Populus sp.*) and alder (*Alnus rhombifolia*).

## **Wetlands**

From Mugu Lagoon to the Santa Monica Pier, the SMMNRA includes 41 miles of Pacific coastline. The coast includes two major lagoons, Mugu Lagoon and Malibu Lagoon, that are a vital stop on the Pacific Flyway, provide habitat for a variety of rare or threatened species (e.g.,

California least tern, brown pelican, Belding's savanna sparrow, and the tidewater goby), spawning grounds for grunion (*Leuesthes tenuis*) and other small fish, a breeding ground for the harbor seal, and habitat for rare coastal plant communities. Mugu Lagoon, is owned by the U.S. Navy and is the largest, relatively undisturbed salt marsh in southern California. The other lagoon, Malibu Lagoon, is at the outlet of the 105 square miles of the Malibu Creek drainage. Smaller estuarine areas are located at the mouths of Topanga Canyon, Trancas Creek, and Zuma Creek.

Threats to Malibu and Mugu Lagoons are landform alteration, urban runoff including elevated levels of nutrients (such as phosphorous and nitrogen), pathogens, toxicants (e.g., heavy metals), litter and trash, alien plant species, and heavy sediment loads.

### *Recreational Use of Water Resources*

The recreational uses of the water resources in the SMMNRA are extremely varied and include both marine and freshwater areas. The shoreline of the SMMNRA receives some of the most intense recreational use in the United States and is an extremely popular summer destination for residents of Ventura and Los Angeles Counties, as well as for visitors from all parts of the United States and other countries. Direct contact recreation at the beaches includes swimming, surfing, scuba diving, snorkeling, bathing, tidepool visiting, and water play. The non-contact water recreation for ocean areas includes fishing, boating, sailing, whale watching, surf fishing, sun bathing, picnicking, and beach sports such as volleyball. In the freshwater areas, direct contact activities include swimming and water play. Freshwater non-contact activities include fishing, nature walks, picnicking, birding, and sailing model boats.

The beaches are used most heavily in the summer. During the remainder of the year, upland areas are used more than the beaches. Visitation in the fall, winter, and spring months is not as great as in the summer, but there is never a time when visitors are absent.

### *Fire Effects on Water Resources*

#### Water quality, nutrient, and temperature effects

Fire leads to short-term impacts on water quality, the degree of impact being related to erosion and sedimentation rates caused by storm severity and fire intensity. Riggan reported that severe fires produced 1.7 times the concentration of  $\text{NO}_3^-$  as moderate fires (Riggan et al., 1994). Fire effects on water quality include increases in stream sediment with consequent increases in turbidity, temperature, and level of dissolved organic nutrients (Tideman, et al., 1979). In general, most organic components of plant biomass are volatilized during combustion, while inorganic compounds (Ca, Mg, Na, K) fall to the soil surface in ash. These inorganic cations can be carried to solution into streams during precipitation and increase levels of these inorganic elements to above normal levels.

Nitrate and phosphate concentrations increased two-to three-fold above normal runoff levels in Malibu Lagoon immediately after the 1993 Old Topanga Canyon Fire and rain events.

Associated effects on biota were limited and were attributed to changes in physical stream parameters from sedimentation and not to changes in water chemistry. The lack of adverse biological impacts from the increased nutrient loading was due to the open connection between the lagoon and the ocean, a seasonal phenomenon for all southern California coastal streams, which breach the sand berm barriers that separate them from the ocean with the coming of major winter storms. Under the normal pattern of fall fires followed by winter storms, the immediate impacts of fire on water quality appear to be transitory, with relatively minor biological impacts (Lin, Suffet, and Ambrose, in press). However in the rare event where a summer fire is followed by an atypical late summer storm, the potential for excess nutrients to create eutrophic conditions exists if the resulting stream flow is inadequate to breach the sand berm. Under these rare circumstances the potential exists for adverse water quality impacts to aquatic organisms in coastal embayments.

Other effects due to fire are the loss of canopy cover. The loss of vegetative cover in riparian areas and adjacent communities result in drier and hotter conditions. These conditions result in the loss of amphibian microhabitats and warmer water conditions which reduce the viability of developing steelhead eggs and larvae. An increase in ultraviolet exposure from canopy loss may also have adverse impacts on certain amphibian species that are unable to repair UV damage.

### Sedimentation and debris flows

Loss of vegetative cover from fire leads to increased rates of hillside erosion which is ultimately deposited as sediment in stream channels. In high intensity storms large quantities of sediment have the potential to be mobilized as debris flows (hillside movement) and debris torrents (stream channel movement) (see page 3-96, Soil Movement). In addition to the direct effects caused by deposition of large quantities of sediment in the stream channel, debris torrents have the potential to create long term changes in stream morphology caused by the flows' extreme erosive forces.

Debris flows will have the biggest impacts on aquatic wildlife as a result of siltation and alteration of pool habitats (Kerby and Kats, 1996). Loss of pool habitats, will have the largest impacts on developing steelhead fry and amphibian larva. Siltation is temporary, as scouring from subsequent rain events will re-establish these habitats. Effects on steelhead and amphibians will not have permanent effects. All amphibians are partially terrestrial and not obligated to these pool habitats. Also, species such as the newt (*Taricha tarosa*) can live up to 20 years, and will re-occupy pool habitats as they are recreated in subsequent years. Steelhead are opportunistic spawners and will return to streams as episodic rain events re-establish stream flows and re-create pool habitats, although, a generation or two may be excluded by stream siltation following fire.

## IV Natural Resources

### D Coastal Resources

The California coast is enriched by upwelling that brings nutrient-laden waters up from depth. This allows rocky reefs along the coast to support lush giant kelp forests, considered to be one of

the most productive ecosystems in the world. The Malibu coastline of the Santa Monica Mountains National Recreation Area has significant amounts of rocky bottom substrate with kelp forests and is considered to be one of the richest and most productive marine habitat areas in southern California (Ambrose et al., 1996).

### *Fire Effects on Coastal Resources*

Kelp beds experience cyclical periods of population growth and decline that varies by season and year. Factors that influence kelp distribution and abundance are oceanic climate cycles such as El Nino, suspended sediments (light), available rock substrate, and wave action from major oceanic storm events. Sedimentation from major storm events following fires has the potential to bury rocky marine substrate. Loss of rocky bottom is considered to be a significant impact because it is a loss of regional biodiversity due to the less productive nature of sandy bottom habitat and the limited distribution of rocky bottom habitat (Ambrose et al., 1996).

In comparison to the Palos Verdes peninsula, the other major kelp habitat area in Santa Monica Bay, there has been a net decline in kelp habitat along the Malibu coast in the last 20 years. The kelp declines in Malibu have been attributed to sediment effects (Smith et al., 2002). In comparison to the Palos Verdes peninsula, the Malibu coast has less sand and relatively greater amounts of clay and silts in the bottom sediments, and greater total amounts of total suspended sediments in the water column.

It has not been determined if the source of greater suspended sediments in the water column is due to re-suspension of bottom sediments or to terrestrial erosion and whether the lower amount of rock substrate is due to increased sedimentation rates from terrestrial sources in the Santa Monica Mountains versus those in the Palos Verdes peninsula. If sediment sources from the land are affecting the amount of rock substrate or suspended sediments, then, the pulse of sediments from post fire years with high rainfall may be an additional contributing factor to the fluctuation in kelp bed distribution and population size.

## **IV Natural Resources**

### **E Paleontological Resources**

Paleontological resources are evidences of life preserved in a geologic context. These non-renewable resources include fossil vertebrates, invertebrates, paleobotanical specimens and other traces of life including burrows, nests, and trackways. Fossil resources provide an insight into the history of life on earth and have phenomenal educational and scientific values. Threats to paleontological resources include natural effects such as rates of erosion and climactic impacts as well as human influences of theft, vandalism, and construction.

Paleontological resources in the Santa Monica Mountains include isolated fossil specimens, fossil sites, and fossil bearing rock units. The paleontologic sensitivity of the SMMNRA varies across the landscape depending on local geology as well as geomorphic factors. The geology and

depositional history of different rock units, in turn, largely determines the potential for yielding fossil remains. The following is a summary of the known fossil bearing rock formations in SMMNRA.

The oldest paleontological resources of the SMMNRA come from the Late Cretaceous Chatsworth formation. Ammonites, extinct mollusks related to the chambered nautilus, have been collected from this formation, as well as marine foraminifera, clams, snails, bryozoans, and shark teeth. A substantial portion of the Cenozoic period (the last 65,000,000 years), the Santa Monica Mountains area has been the site of marine deposition. There are a number of tertiary rock units in the mountains known to yield scientifically significant paleontologic resources (e.g., Modelo, Pico, and Topanga formations). The sediments of the Modelo formation contain microfossils, clams, bony fish, whales, and algae. Bryozoans, gastropods, sharks, and cetaceans have been recovered from fossil sites in the Pico Formation. The Topanga formation, a shallow-water, marine sandstone unit, has yielded bony fish, bivalves, and gastropods.

Less sensitive are the extensive deposits of colluvium mantling the hills of the SMMNRA, as well as the alluvium of the outwash fans issuing from the canyons. In contrast, fine-grained (clay to fine sand) valley fill deposits have yielded the remains of a diversity of extinct Pleistocene land mammals. Recent discoveries in southern California of quaternary-age fossil plants entombed at the base of landslides have provided important new information on the ecological history of the region (e.g., Axelrod, 1988), and have been used to determine that this important phenomenon is distinctly episodic (Reneau et al. 1986).

### *Fire Effects on Paleontological Resources*

Fire has the potential to directly impact surface fossils where heat may fracture fossil rock. This is believed to be a relatively minor impact, however. Fossil resources are more likely to be damaged by heavy equipment in fire control operations. Fossil resources may be exposed after wild-fire and therefore be susceptible to theft or vandalism. The most serious impact to fossil resource may occur with heavy post-fire erosion.

## **IV Natural Resources**

### **F Air Quality**

Congress recognized the significance of the Santa Monica Mountains, situated between the highly developed Los Angeles Basin, the San Fernando Valley, and the Oxnard Plain, in the recreation area's enabling legislation. Public law 95-625 specified that

*"...the Secretary shall manage the Recreation Area in a manner which will preserve and enhance ...its public value as an air shed for the southern California metropolitan area."*

Since the 1940's, air quality measurements taken adjacent to the Santa Monica Mountains in urban Los Angeles have been among the worst in the United States. The South Coast is in extreme non-attainment for ozone, serious non-attainment for carbon monoxide, and serious non-

attainment for small particulate matter under 10 microns (PM10). The South Coast Air Quality Management District (SCAQMD) and Ventura County Air Pollution Control District (APCD) function as the oversight organizations for monitoring air quality and compliance with standards. Atmospheric circulation patterns influence the intensity of smog in southern California. The development of strong temperature inversions, which inhibit vertical air mixing, occurs especially during the summer months. In the presence of temperature inversions, visibility is greatly decreased and pollutants are trapped close to the ground in the basins of the Los Angeles metropolitan area. Lower air quality occurs during the summer due to the combination of persistent, strong inversion layers with intense solar radiation, which increase the photochemical reactions that contribute to the amount of ozone produced. During the winter, lower weakened inversion layers, a result of less intense solar radiation, dissipate during winter afternoons as direct solar radiation reaches a peak and heats the ground surfaces, causing air to rise, creating convective air currents.

Air quality in the vicinity of the Santa Monica Mountains varies widely as a result of physiography, climatological conditions, the location or presence of an inversion layer, distance from the coast and the amount of pollutants emitted into the atmosphere. Overall, coastal areas experience better air quality than inland interior valleys and the Santa Monica Mountains exhibit better air quality than the surrounding urban landscape. As a result of air quality standards instituted with the California Clean Air Act, air quality has improved in the Los Angeles area since monitoring began (SCAQMD, 1993).

### *Ecological Impacts of Air Quality*

The ecological effects of poor air quality in the Santa Monica Mountains are not well known, although it is clear from studies in other parts of southern California that declining air quality does impact native plant communities. For example, pollutants contribute to nitrogen deposition on foliage, which in turn can favor the invasion of natural communities by exotic plants and also causes a decline in water quality. This has been a significant problem in coastal sage scrub areas in other parts of southern California. In the Santa Monica Mountains, prevailing winds keep the air relatively clean, so similar impacts are likely not as severe. However, more research is necessary to definitively ascertain these and other ecological impacts from air pollution in the SMMNRA.

### *Regulatory Overview*

The SMMNRA, is a Class II area under the Federal Clean Air Act (CAA, as amended), located in Ventura and Los Angeles counties. Ventura County is part of the South Central Coast Air Basin under the authority of the Ventura County Air Pollution Control District (APCD). Los Angeles County is part of the South Coast Air Basin under the authority of the South Coast Air Quality Management District (AQMD). The APCD and AQMD are the governing authorities with primary responsibility for controlling air pollution sources in Ventura County and Los Angeles County, respectively.

## *National Ambient Air Quality Standards*

The CAA requires the Environmental Protection Agency to identify national ambient air quality standards (NAAQS) to protect public health and welfare. Standards have been set for six pollutants: ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), particulate matter less than 10 microns (PM<sub>10</sub>) and less than 2.5 microns (PM<sub>2.5</sub>), and lead (Pb). These pollutants are called criteria pollutants because the standards satisfy criteria specified in the act. An area where a standard is exceeded more than three times in three years can be considered a non-attainment area subject to planning and pollution control requirements that are more stringent than areas that meet standards. Ventura County is in attainment or is unclassified for all federal ambient air quality standards except ozone, and exceeds California state air quality standards for ozone, carbon monoxide and particulate matter. Los Angeles County does not meet federal or state standards for ozone, carbon monoxide and particulate matter.

## *State Implementation Plan*

Ventura County APCD and South Coast AQMD are responsible for developing a State Implementation Plan (SIP) for federal and state pollutants for which they are not in attainment. The SIP defines control measures that are designed to bring areas into attainment. Basic components of a state implementation plan include legal authority, an emissions inventory, an air quality monitoring network, control strategy demonstration modeling, rules and emission limiting regulations, new source review provisions, enforcement and surveillance, and other programs as necessary to attain standards. Emission sources are broken into four main categories: stationary, non-road mobile, on-road mobile, and biogenic.

## *Ventura County Air Quality Monitoring*

Ventura County air has dramatically improved over the years between 1973-2000, although the federal standard for ozone is still exceeded. Progress has been steady and, overall, the air is getting cleaner year by year. Pollutants are being emitted into the air at a lesser rate, but the weather dictates if the pollutants will disperse or accumulate.

## *Los Angeles County Air Quality Monitoring*

In a continuing trend of significant long-term improvement in air quality in the South Coast Air Basin, the year 1999 recorded a new low in ozone concentrations. However, maximum pollutant concentrations in the region still exceed the federal standards for ozone, carbon monoxide, and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) by a wide margin.

## *Santa Monica Mountains National Recreation Area*

There are no ambient air quality monitoring sites within the boundaries of the SMMNRA. The SMMNRA depends on local district monitoring sites for air quality information. A 1998 emissions inventory of pollutants is available for the SMMNRA where stationary, area, and mobile source emissions within the park were calculated. Particulate matter (PM), sulfur dioxide (SO<sub>2</sub>),

nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOCs) were estimated for stationary and area sources within the SMMNRA. Stationary sources include fossil fuel-fired space and water heating equipment, fireplaces and wood stoves. Area sources include prescribed burning and campfires. Mobile emission sources in SMMNRA include highway and non-road vehicles and equipment. Particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOCs) were calculated for mobile sources. When compared to regional emissions SMMNRA air pollution emissions are negligible (SMMNRA GMP, Tables 31, 32, and 33 in the Air Quality Tables and Figures appendix). The majority of air pollution in the SMMNRA is transported from mobile sources outside the park, especially from Los Angeles County and the surrounding area.

### *Conformity Rule*

Section 176 of the Clean Air Act requires that federal actions conform to State Implementation Plans (SIP) for achieving and maintaining the national standards. Federal actions must not cause or contribute to new violations of any standard, increase the frequency or severity of any existing violation, interfere with timely attainment or maintenance of any standard, delay emission reduction milestones, or contradict SIP requirements. The conformity rule applies only in federal non-attainment areas. Conformity applies to activities in SMMNRA because Ventura County exceeds the federal ozone standard and Los Angeles County exceeds federal standards for ozone, carbon monoxide, and particulate matter.

### *Fire Effects on Air Quality*

Periods of the worst air quality within the Los Angeles metropolitan area may coincide with weather conditions which favor fuel-driven wildfires. There have been a number of air quality incidents in which high levels of hydrocarbon emission related pollution have been supplemented with particulate debris from severe forest fires in the mountains surrounding the populated inland basins.

Poor air quality conditions also coincide with live-fuel moisture conditions that are favorable for prescribed burning. In general, prescribed burns will affect local air quality for short periods of time on the burn day, with air quality returning to normal levels once the burning is completed. Particulate matter is the primary air pollutant from prescribed burns, and may cause short term localized impacts on visibility or serious health effects to sensitive individuals.

The use of prescribed fire for land management purposes is regulated by the State Air Resources Board under the jurisdiction of the South Central Coast Air Quality Management District (Ventura County Air Pollution Control District) and the South Coast Air Quality Management District in accordance with the conformity rule. Smoke emitted by prescribed fire and its dispersal characteristics are determined by the techniques used in the application of prescribed fire, and the weather conditions present at the time of the burn. The use of backing fires, wind patterns that disperse smoke away from sensitive areas, fuel moisture conditions which promote rapid burnout, and good smoke management plans, all help limit the air pollution contributions from prescribed fire.

Air quality problems may occur when other local agencies conduct prescribed burns that occur simultaneously with NPS prescribed burns. There are a limited number of local air quality management district permitted burn days that occur in conjunction with weather and fuel moisture conditions conducive to prescribed burning. The chances of more than one agency conducting prescribed burns on the same day are high. Inter-agency co-ordination through the local air quality management districts is required to insure that local air quality standards are not impaired by prescribed burning activities.

## V Cultural/Historic Resources

### *Historical Overview of the Santa Monica Mountains Region*

The Santa Monica Mountains have been at the center of complex human interactions for thousands of years. The richness and diversity of the region's cultural resources reflect the density and diversity of human population in the mountains over time.

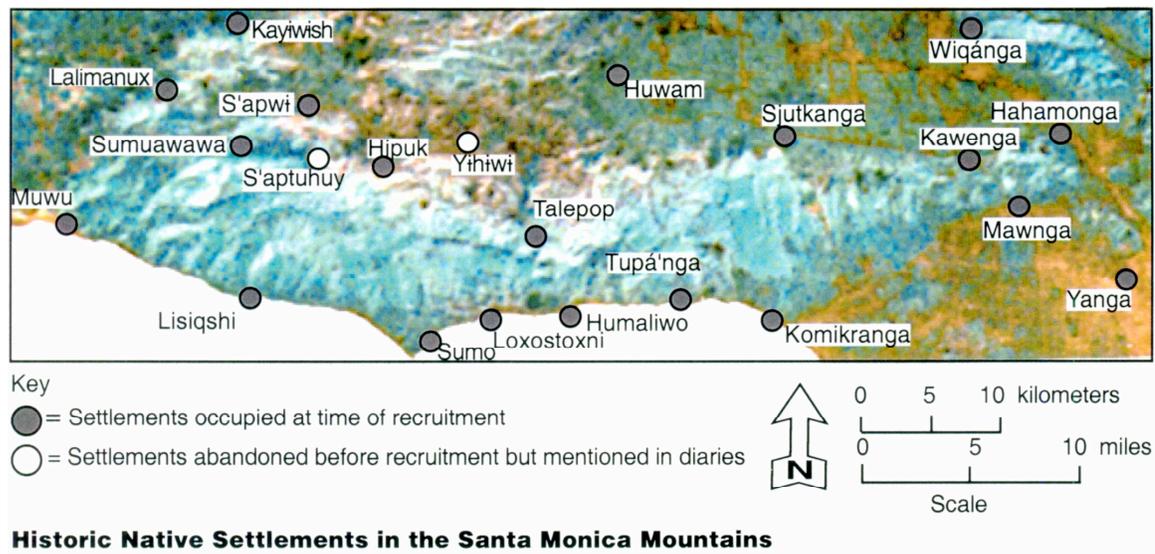
#### The Chumash and Gabrielino/Tongva

At historic contact, the Santa Monica Mountains were occupied by Native Americans of two tribal affiliations: Chumash and Gabrielino/Tongva (King, 2000). While speaking languages of different families, marriage records of the Spanish Missions document significant social interactions between the Chumash and Gabrielino/Tongva. Likewise, the two groups shared a number of common cultural traits. The following summaries of Chumash and Gabrielino/Tongva culture are summarized from King (2000) and references therein.

#### ***Chumash***

The Chumash held much of the south-central California coast, including the northern Channel Islands, as well as inland portions of the Coast and Peninsular ranges. The Santa Monica Mountains comprised the southernmost extent of Chumash settlement (Figure 3-26). The Chumash were subdivided into several geographically distinct linguistic divisions, and those Chumash occupying the Santa Monica Mountains were known as Ventureño. The Chumash population ranged from 15,000 to 20,000 people, perhaps 1300 of whom resided in the Santa Monica Mountains region. Archeological and linguistic data suggest that the Chumash culture may have evolved in place for more than 9000 years.

Figure 3-26 Historic Native Settlements in the Santa Monica Mountains



The village was the center of Chumash life. A typical Chumash village contained several houses (sheltering five or six occupants each), sweat and menstrual lodges, and a cemetery. Food stores, processing implements and wealth items were also kept there. Historical records document at least six coastal and 10 interior Chumash villages in the Santa Monica Mountains region. Village populations ranged from perhaps 15 to 400 individuals, and coastal villages were, on average, somewhat larger than those of the interior. Each village had associated resource extraction sites in its respective territory, although it was likely that most inhabitants returned home each evening. In addition, the Chumash recognized shrines within the Santa Monica Mountains region, and many natural features on the landscape were named.

At historic contact, the Chumash did not practice traditional agriculture, relying instead on the great diversity of plant, animal, and insect life found in the Santa Monica Mountains region. Those villages along the coast were particularly adept at the extraction of marine resources, including dozens of fish species, marine mammals, and a variety of mollusks. The take of marine resources was facilitated through the use of large redwood plank canoes, which allowed for utilization of offshore species. The remains of marine resources also occur in archeological sites in the interior of the Santa Monica Mountains, suggesting trade with coastal inhabitants.

Terrestrial resources were also of great importance to the Chumash of the Santa Monica Mountains. Animals utilized included large mammals (deer and pronghorn), small mammals, reptiles, and various birds. Plant foods assumed particular significance among the Chumash, with bulbs and roots of yucca, small seeds, acorns and other nuts, fruits, and greens being the chief staples. The Chumash had extensive knowledge of the seasonal availability of plant foods, and were able to harvest virtually year-round.

Although not traditional agriculturalists, it is a mistake to assume that the Chumash simply relied

on the natural reproductive potential of the terrestrial resources upon which they subsisted. Instead, the Chumash engaged in a variety of resource management activities, of which fire was the most important. Intentional burning was conducted in order to spur the growth of desired plant species, facilitate hunting, reduce fuel loads, and many other purposes.

Spanish accounts documented the Chumash as being extremely socially and politically complex, especially when compared to other non-agricultural societies. Chumash society was hierarchically organized and many political positions were ascribed. The chief was the central authority of the political system, and most villages had one or more chiefs. Particularly influential chiefs could control large areas and numerous villages. For example, a paramount chief residing at the village of Humaliwo had jurisdiction over a large part of the Santa Monica Mountains. Such wide-ranging influence was facilitated by an extensive network of kinship ties. Chiefs were charged with managing stores of food, caring for the impoverished, hosting fiestas, and administering activities within the village territory. Two messengers served each chief, and relayed information between villages. An individual called a paxa trained and initiated members of the secret men's society 'antap. The paxa and members of 'antap society were usually members of high ranking families, and assisted the chief in hosting social gatherings.

Spanish accounts also document a high degree of industriousness among the Chumash. Manufacture of certain items of wealth, such as shell beads and plank canoes, probably fell in the hands of various specialists. The Chumash of the Santa Monica Mountains specialized in the manufacture of arrows for the adjacent Gabrielino/Tongva, and perhaps stone mortars as well. The Chumash and their neighbors maintained a brisk trade in shell beads, food, and other goods.

### ***Gabrielino/Tongva***

At European contact, the territory of the Gabrielino/Tongva encompassed the Los Angeles Basin, portions of the adjacent mountain ranges and the southern Channel Islands, including the easternmost Santa Monica Mountains (Figure 3-21). The Gabrielino/Tongva residing in the Santa Monica Mountains were members of a distinct Western Tongva group, whose territory also included the southern San Fernando Valley, southern Channel Islands, downtown Los Angeles and San Pedro. Mission registers indicate that the Western Tongva rarely intermarried with Gabrielino/Tongva residing east of the Los Angeles River. On the basis of archeological and other evidence, the Gabrielino/Tongva appear to have arrived in the region between 2500 and 3000 years ago.

Nine historic Western Tongva villages have been identified in the Santa Monica Mountains region. Most of these villages were located in the interior, and populations ranged from about 10 to 360 inhabitants.

Subsistence practices among the Gabrielino/Tongva were similar to those of the Chumash, with extensive utilization of both marine and terrestrial resources. The material culture of these groups was also comparable, including use of redwood plank canoes by the Gabrielino/Tongva.

The Gabrielino/Tongva social organization mimicked that of the Chumash with hereditary chief-

tainship and religious authority delegated to ceremonial managers (also called paxa or paha) of secret dancing societies. It appears that political and ritual organization may have been more important for organizing behavior among the Gabrielino/Tongva than the economically driven Chumash.

Gabrielino/Tongva cosmology was dictated by an all-powerful god Tcangitngic, who brought misfortune to those unwilling to comply with his moral authority. Oral traditions among the Gabrielino/Tongva reveal heavy emphasis on political authority, law and spiritual position.

### The Spanish Era

Sporadic Spanish contact with the Santa Monica Mountains and its native inhabitants began in the 1500's with exploratory voyages along the Pacific coast. Although Spain claimed Alta California as part of its empire, sustained Spanish presence in the region was not established until the late 1700's. Three Franciscan Missions – San Gabriel (founded in 1771), Ventura (founded in 1782), and San Fernando (founded in 1797) – drew native converts from the Santa Monica Mountains. Mission records indicate that the majority of Santa Monica Mountains Chumash were baptized at Ventura, while Western Tongva were drawn exclusively to San Gabriel and San Fernando. Native Americans of the Santa Monica Mountains region submitted to conversion from the late 1700's and through the early 1800's. Generally speaking, the farther a village lay from a mission, the later in time its inhabitants abandoned their aboriginal territory. Los Angeles Pueblo, a secular settlement established in 1781, also served an important economic and social role in the region.

Religious conversion and abandonment of traditional villages was largely voluntary. Native Americans were enticed to the missions for the opportunity to exploit new religious, social, political, and economic opportunities. The Spanish were eager for converts not only to satisfy Christian doctrine, but also the critical need for a labor source to perform agricultural tasks, domestic chores and other duties. In exchange, Native Americans were fed, clothed, sheltered, and given a Christian education. Conversion, however, meant abandonment of many traditional cultural practices and rapid knowledge loss. Those failing to comply with the restrictions of the new lifestyle could be harshly punished. In addition, the crowded Mission environment promoted the rise and spread of infectious diseases against which native populations had no or little immunity, and resulted in very high mortality rates.

In an effort to strengthen its hold on Alta California, Spain offered land grants to private citizens for economic development. These ranged from hundreds to many thousands of acres in size. Seventeen such grants were established within and adjacent to the Santa Monica Mountains, most of which served as cattle ranches (or ranchos). Local Native Americans were quick to relocate to ranchos and find employment as cowboys or vaqueros; abandonment of several villages in the Santa Monica Mountains between 1770 and 1800 (prior to Mission recruitment) might be attributable to this phenomenon.

## The Mexican Era

When Mexico, whose territory included the American West, won its independence from Spain in 1821, Mexican officials and land speculators pressed for the distribution of mission property. During the 1820's and 1830's, the Mexican government passed legislation to both diminish the influence of the Franciscans and distribute mission lands to settlers, and by 1834 all of the mission lands were secularized and opened to occupation. In addition, the Mexican government continued the Spanish practice, begun decades earlier, of granting private individuals large tracts of land.

Like Spain, however, Mexico could not sustain its hold upon the vast American West. In 1848, United States military forces defeated those of Mexico, and the subsequent Treaty of Guadalupe Hidalgo ceded more than 500,000 square miles of territory, including Alta California, to the United States.

## California Statehood to the Present

News of gold discovered in California swept across the nation in 1848, and Americans rushed west to find it. In 1850, California was admitted to the Union and San Francisco, Sacramento, Stockton, Los Angeles, and San Diego began to take form as cities. American emigrants to California also discovered vast tracts of land either occupied by Native American Indians or held by rancheros, and the uncertainties and confusion over the ownership and boundaries of the land required years to sort out.

Native American Indians had no legal rights to land in early California. Even though they were bound to the land by millennia of occupation, they were ousted from favorable lands, and in some instances, interned in reservations, modeled after the missions. Some California Native American Indians were massacred in their villages.

More troublesome to land acquisition for the new Californians, was the legacy of the Hispanic land claims associated with rancho concessions. In 1851, Congress passed the California Land Act, establishing a three-person Land Claims Commission and a complex legal mechanism to determine the legitimacy of Hispanic land claims. The indefinite boundaries of the unsurveyed landholdings, the lack of documentation in the possession of the claimants, and both the expenses of the legal fees and the time necessary to establish title in the courts, often delayed confirmation of landholdings, sometimes for decades. In addition, title to the former rancho concessions was frequently clouded by the host of American newcomers who, taking advantage of a process burdened with confusion and delay, simply settled on the land and were later looked upon favorably by the non-Hispanic courts.

By the 1870's, the demand for land in California prompted the subdivision of many of the larger landholdings. Since the latter decades of the 19th century, the rapid subdivision and re-subdivision of land, often punctuated by claims and counter claims, has been an enduring characteristic of much of the California landscape, including pockets of the Santa Monica Mountains.

During the 20th century, a favorable climate, water supplied from outside sources, agriculture, oil, the movie industry, and the burgeoning automobile industry facilitated the transformation of

the Los Angeles basin into a megalopolis. Today, the greater Los Angeles metropolitan area is one of most racially and culturally diverse areas of the world and the Santa Monica Mountains are an island of open space amidst a sea of urbanization.

### ***Cultural Resources of the Santa Monica Mountains Region***

The NPS (1997) recognizes five types of cultural resources: archeological resources, structures, ethnographic resources, cultural landscapes, and museum objects. Archeological resources “are the remains of past human activity and records documenting the scientific analysis of these remains” (NPS, 1997:8). These include artifacts, ecofacts, and features. Structures “are material assemblies that extend the limits of human capacity” (NPS, 1997:8), and comprise such diverse objects as buildings, bridges, vehicles, monuments, vessels, fences, and canals. Ethnographic resources “are basic expressions of human culture and the basis for continuity of cultural systems” and encompasses both the tangible (native languages, subsistence activities) and intangible (oral traditions, religious beliefs) (NPS, 1997:9). The management of ethnographic resources entails the recognition that traditional cultures can have different worldviews and the right to maintain their traditions. Cultural landscapes “are settings we have created in the natural world” (NPS, 1997:8). They are intertwined patterns of natural and constructed features that represent human manipulation and adaptation of the land. Finally, museum objects “are manifestations and records of behavior and ideas that span the breadth of human experience and depth of natural history” (NPS, 1997:8). Examples of typical museum objects include field and laboratory notes, artifacts, and photographs.

#### **Archaeological Resources**

About 20 percent of NPS lands in the SMMNRA and an estimated 30 percent of the land throughout the Santa Monica Mountains have been surveyed for archeological sites. Archeological site density in the Santa Monica Mountains is very high, with more than 1500 known archeological sites, including 188 on NPS land, numerous resources on California State Parks and Santa Monica Mountains Conservancy owned land and another 1200 sites in the Santa Monica Mountains Zone. Of these, sites representing precontact and historic native occupations, as well as Euroamerican settlement have been documented.

#### ***Native American Archeological Resources***

The great percentage of the recorded archeological sites in Santa Monica Mountains contain components attributable to Native American Indians. King (2000) identified several documented site types in the Santa Monica Mountains including: permanent settlements (villages), temporary camps, yucca ovens, bedrock milling features, rockshelters, lithic quarries, and pictographs. Two Chumash archeological sites in the Santa Monica Mountains — the village of Humaliwo, and Saddle Rock Ranch pictograph site — are listed on the National Register of Historic Places. In addition, at least two sites have been formally determined eligible, but are not yet listed; the vast majority of Native American Indian archeological resources have not been evaluated.

There has been no systematic monitoring of archeological sites over time in the Santa Monica

Mountains. However, the overall impression is that many extremely important sites have been lost to development but significant sites remain. Archaeological sites continue to be threatened by development, salvage archeology, private collectors, inadequate protections from the permit process, acid fog and rain, malicious vandalism, fire and fire suppression, and most importantly, erosion from fire, flooding, development, or earthquakes and landslides.

King (1990, 2000) suggested that the Santa Monica Mountains region was occupied by at least 11,000 years B.P., although direct evidence is scarce. The Early Period (8000 to 2200 years B.P.), marks the first preserved evidence of permanent settlements and cemeteries in the region. While most Early Period settlements appear to have been rather small, larger villages supporting several hundred inhabitants were also present. Stylistically, artifacts such as shell beads and ornaments changed little throughout the Early Period, although increased numbers through time is taken to reflect a growth in social complexity. Millingstones and handstones are common in Early Period sites, although mortars and pestles did not appear in appreciable numbers until 6,000 to 5,000 years B.P., suggesting adoption of an increasingly diverse diet. Marine fishing appears to have gained importance through the Early Period.

The Middle Period (2200 to 900 years B.P.) is signified by changes in ornaments and other artifacts and cemetery organization from the preceding Early Period that King (1990, 2000) took to reflect development of hereditary control of political and economic power. Middle Period settlement shifts, such as settlement in previously marginal zones and villages in locations with poor defensibility, are suggested to signify integration of villages into larger political units, as well increased economic integration.

Finally, the Late Period (900 to 150 years B.P.) saw the rapid development of new economic subsystems like those described by the Spanish. Populations aggregated into larger villages, which may have encouraged trade. Native groups intensively managed a wide variety of habitats, and many foodstuffs were traded to the Channel Islands, where terrestrial resources were scarce. Conversely, those villages in the interior valleys relied on marine resources transported from the coast. The absence of ritual objects in Late Period grave lots implies that religion was controlled by powerful institutions.

Although Chumash and Gabrielino/Tongva material culture was quite similar, some distinctions can be recognized in the archeological record. For example, cremation mortuaries occur only in the territories occupied by the Gabrielino/Tongva and related groups speaking Uto-Aztecan languages.

King (2000) suggested that other less conventional archeological remnants might also be found in the Santa Monica Mountains. For example, “fields” where crops of small seeds were actively managed with fire and other means might be recognizable through detailed soil analysis, including the recovery and identification of phytoliths. Furthermore, the modern distribution of vegetation may be indicative of past human management practices, and mapping economically important species such as yucca, wild cherry and oak useful for reconstructing resource procurement and use.

Based on analysis of historical, archeological and ecological data, King (2000) developed a set of archeological expectations for particular landforms and vegetation communities in the Santa Monica Mountains (Table 3-10). These might prove useful for predicting the locations and contents of archeological resources found in unsurveyed areas.

**Table 3-10 Expected Archeological Indicators by Vegetation Community and Landform (Adapted from King 2000)**

<b>Setting</b>	<b>Archeological Evidence</b>
Ridge Tops and Foothills	Yucca ovens, burned yucca and bulb parts; artifacts and features associated with hunting and camping; tools for making and maintaining traps; postholes of pole structures and house depressions
Open Areas at Junction and Foothills	Mortars and pestles; burned chia and other seeds; carbonized oak bark; postholes of pole structures and house depressions
Chaparral	Artifacts and features associated with hunting and camping; burned manzanita berries and seeds; burned islay hulls
Wetlands	Burned seeds of gathered seeds; carbonized oak bark; mortars and pestles
Riparian	Artifacts and features associated with hunting and camping; burned berries; carbonized acorn hulls and attachment scars; fire-altered rocks; structures
Beach	Bones of fish, shells and small mollusks; fishhooks and tools used to make and repair nets

### ***Historical Archeological Resources***

There were nearly 1300 homestead claims in the Santa Monica Mountains, though not all of the claims were improved and patented. As more archeological surveys are undertaken, more information regarding historic archeological sites will become available, providing important interpretive links to the settlement and development of the mountains during the 19th and 20th centuries.

### **Historic Structures**

There are hundreds of structures in the Santa Monica Mountains and adjacent foothills that are considered to be of at least local historical significance. Some structures are significant because of the events that occurred there. Rancho Sierra Vista, for example, is important for its contribution to the development of agriculture in Ventura County, particularly cattle and horse raising and the introduction of citrus and avocado orchards. Other structures are significant because of their occupant, such as the Will Rogers House or the Adamson House. Still others are significant for their architectural style, representing the diverse artistry of such architects as Wright, Neutra, and Schindler.

None of the missions established by the Spanish were within the boundaries of the SMMNRA. A few rancho era structures are within the boundaries, such as the Sepulveda adobe, as well as many structures built during the American homesteading and ranching era, such as the Chesebro Road (ca. 1880's).

Three structures within the SMMNRA's boundaries, but which are not on NPS lands, are listed in the National Register of Historic Places:

- **Adamson House and Grounds** – Erected in 1929, the Adamson House, located within Malibu Lagoon State Beach, is notable for its blend of Moorish and Spanish-Mediterranean architecture and the use of lavish tile art on floors and walls. In addition, the site's designed landscape reflects the long interaction between the house's inhabitants and the land. The house is significant for its association with a family who originally migrated to America in 1638 and whose descendants moved westward to California.
- **Loeff's Hippodrome, Santa Monica Pier** – Loeff's Hippodrome is a rare example of an early shelter built to house a carousel in an amusement park, and is one of only two such structures that remain on the west coast. The carousel in the Hippodrome is not the Loeff carousel originally installed in 1916, when the Hippodrome opened. The present carousel is a Philadelphia Toboggan Company carousel built in 1922 and installed in the Hippodrome in 1947.
- **Will Rogers House** – Located in Will Rogers State Historic Park, this house was the home of noted American humorist, writer, and motion picture actor — Will Rogers. Many trophies, collections, and personal effects of Will Rogers are exhibited in the house. The house, which was built ca. 1926, and adjacent land was presented to the State of California in 1944, for use as a state park.

In addition, there are about 15 structures on NPS lands — at the Paramount, Rancho Sierra Vista and Peter Strauss Ranches — that are currently recorded in the recreation area's List of Classified Structures (Table 3-11).

**Table 3-11 List of Classified Structures**

Structure	LCS Number	National Register Status
Keller House	059749	Not Evaluated
Morrison Ranch House	059747	Not Evaluated
Paramount Movie Ranch – Equipment Storage Shed	059687	Eligible
Paramount Movie Ranch – Fire Patrol Station	059685	Eligible
Paramount Movie Ranch – Livestock Barn	059683	Eligible
Paramount Movie Ranch – Main Roads	059683	Eligible
Paramount Movie Ranch – Medea Creek Bridge	059689	Eligible
Paramount Movie Ranch – Mess Hall-Kitchen	059681	Eligible

Structure	LCS Number	National Register Status
Paramount Movie Ranch – Carpenter Shop	059682	Eligible
Paramount Movie Ranch – Prop Storage Shed	059684	Eligible
Paramount Movie Ranch – Prop Storage Shed	059686	Eligible
Peter Strauss Ranch – Amphitheater	059940	Eligible
Peter Strauss Ranch – Aviary	059939	Eligible
Peter Strauss Ranch – Entrance Arch	059932	Eligible
Peter Strauss Ranch – Guest House	059936	Eligible
Peter Strauss Ranch – Live Oak No. 6/Boundary Marker	059931	Eligible
Peter Strauss Ranch – Main House	059926	Eligible
Peter Strauss Ranch – Petting Zoo	059941	Eligible
Peter Strauss Ranch – Retaining Walls	057908	Eligible
Peter Strauss Ranch – Spillway/Bulkheads /Abutments	059942	Eligible
Peter Strauss Ranch—Stone and Concrete Terracing	059927	Eligible
Peter Strauss Ranch—Storage Shed	059937	Eligible
Peter Strauss Ranch—Swimming Pool	059933	Eligible
Peter Strauss Ranch—Terrazzo Dance Floor	059938	Eligible
Peter Strauss Ranch—Watchtower/Gatetower	059928	Eligible
Peter Strauss Ranch—Water Tank	059935	Eligible
Rancho Sierra Vista Barn	059748	Potentially eligible

The fire protection requirements of these buildings are significantly different from each other. Some of these buildings are along main highways, have unimpeded access and are highly visible. In contrast, some of the historic structures are relatively remote, otherwise hidden, and highly susceptible to damage and/or destruction by wildfire. In particular, the Morrison Ranch House is situated in an area of moderately dense natural vegetation and is located a considerable distance from the nearest paved road. Annual clearing of brush and grass immediately adjacent to the structures is performed annually by NPS maintenance staff.

***Additional historic structures potentially eligible for the National Register***

Structures on NPS lands:

- Arroyo Sequit (Mason) house
- Beal House at Rancho Sierra Vista

- Roberts shrine in Solstice
- Doheny house in Franklin
- Franklin Canyon Penstock
- Franklin Canyon WPA (Works Progress Administration) improvements
- Camp 8 structures
- Cheeseborough homestead site
- Cheeseborough historic road

There are many other structures potentially eligible for the National Register but are not on NPS land. These structures include:

- Structures on State Park lands
- Adamson House
- Will Rogers House, Barn and Polo field
- Stunt homestead site
- Danielson Home in Point Mugu
- Danielson hunting cabin and cemetery in Point Mugu
- Rancho Sierra Vista Ranch Center in Point Mugu
- Mr. Blanding's Dream House (Movie Set)
- Mott adobe (ruins)
- Malibu Pier
- Sepulveda Adobe
- Sycamore House, Point Mugu State Park

Other structures in SMMNRA:

- Stokes adobe at Gillette Ranch
- Wallace Neff designed buildings at Gillette Ranch
- Dunbar McBride ruins
- Historic Structures in Coldwater Canyon Park
- Campo de Cahuenga
- Malibu Pier
- Santa Monica Pier

- Loeff's Hippodrome
- Roads — see landscapes
- Tunnels
- Franklin Canyon Dams
- Malibu Dam and Lake
- Lake Eleanor Dam
- Lake Sherwood Dam
- Rindge Dam
- Lake Shrine

Significant structures outside of SMMNRA:

- Hollyhock House
- Hollywood Bowl
- Reagan Library
- Leonis Adobe
- El Pueblo State Historic Site
- Greystone Doheny Mansion
- Los Encinos State Historic Park
- Reyes Adobe
- Stagecoach Inn
- Getty Malibu Museum
- Skirball Museum
- UCLA Structures
- Veterans Cemetery & Buildings
- Rocketdyne Rocket test structures
- Camarillo Hospital

### Museum Collections

More than 250,000 museum objects, specimens and archives are stored in the SMMNRA storage facility at Rocky Oaks. The collections are organized into seven broad categories — archeology, ethnology, history, archives, biology, paleontology, and geology — and provide evidence of activities that brought them into being and information about associated people, organizations,

events, and places. The collections serve as reference material for staff and students, and documented material for public exhibit and programs. The physical condition of the SMMNRA collections is generally good to excellent, and the present curation facility at Rocky Oaks meets NPS standards (36 CFR 79) in regard to environmental control, fire protection, and security. However, the facility has some unique considerations in terms of fire management and protection. The building sits on a knoll in a well-known fire corridor.

In addition to the Museum Research building at Rocky Oaks, the following additional buildings may house or contain NPS museum objects:

- Visitor's Center at SMMNRA Headquarters
- Satwiwa Cultural Center
- Tack Room at Rancho Sierra Vista
- Wagon Storage Area at Rancho Sierra Vista

### Ethnographic Resources

Ethnographic resources are defined by the National Park Service as any “...*site, structure, object, landscape, or natural resource feature assigned traditional, legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it*” (Cultural Resource Management Guidelines, 1996). The Santa Monica Mountains were, and are, the home of two of the largest groups of Native American Indians in California: the Chumash and the Gabrielino/Tongva. Ethnographic sites of the contemporary Chumash and Gabrielino/Tongva preserve and reflect their traditional values.

The SMMNRA has held regular consultations with the region's contemporary Native American Indians since the recreation area's founding, and members of the region's Native American Indian community have shared their knowledge and skills with the SMMNRA. One result of the consultations is the identification of significant areas in the Santa Monica Mountains that require protection, such as Boney Ridge, the Western slope of the Santa Monica Mountains, Point Dume, Mugu, Santa Monica Canyon, Satwiwa (Round Mountain), Saddle Rock, Castle Peak, El Escorpion, Burro Flats, El Encino, University Springs, Saddle Peak, Seminole Hot Springs, and of course, all villages, cemeteries, caverns, and pictographs, where Native American Indians have a long and deeply spiritual history of interaction.

### Cultural Landscapes

Cultural landscapes within NPS-owned and managed lands in SMMNRA can be identified by their connection with particular historic land uses that revolve around general themes of the National Park Service Thematic Framework (1996). Each cultural landscape contains component features that include barns, corrals and fences, farmhouses, archaeological sites, roads and trails, water-management structures, and introduced vegetation and landscaping. All of these landscape features possess tangible evidence of the activities and habits of the people who occupied,

developed, used, and shaped the land to serve their needs. The dynamic processes of landscape evolution in the Santa Monica Mountains region have resulted in physical and temporal overlap of a variety of cultural landscapes.

The *Land Protection Plan* and the *General Management Plan* recognize a hierarchy of NPS responsibility that is most direct on NPS owned land, extends to NPS proposed acquisitions, and a cooperative preservation responsibility within the SMMNRA boundaries, and extending into the Santa Monica Mountain Zone. Thus, in the level 0 inventory, landscapes are identified which are not directly managed by the NPS, but which are important contributors to the SMMNRA and in which we have cooperative responsibilities.

Much additional work needs to be done to study and document the importance of these landscapes, to evaluate them according to National Register criteria and seek determinations of eligibility for the National Register. In addition, other agencies such as the California Department of Parks and Recreation (CDPR), California Office of Historic Preservation, Native American Indians, and other stakeholders need to be consulted. A preliminary list of cultural landscapes can be found in Appendix 2 of the General Management Plan. Paramount Ranch has been determined to be a nationally significant cultural landscape. Rancho Sierra Vista (both NPS and CDPR) has been determined to be a significant historic district. Other landscape studies are in process.

Following is a partial listing of the Cultural Landscape Inventory:

- Santa Monica Mountains Chumash / Tongva Ethnographic & Archeological District
- Other Ethnographic / Archeological Areas
- Archeological District (Features)
- Mission / Rancho Landscape
- Ranching and Homesteading Landscapes
- Rancho Sierra Vista Historic Ranching District
- Simi Hills (Palo Comado, Cheeseboro, Upper Las Virgenes Canyons) Historic Ranching District (Landscape)
- Los Encinos State Historic Park
- White Horse Farm (Landscape)
- Reagan Ranch (Landscape)
- Stunt Ranch (Landscape)
- Mason Homestead (Landscape)
- Decker Homestead (Landscape)
- Beach Recreation Landscape

- Medea/Triunfo Valley Cinema Landscape
- Paramount Movie Ranch
- Franklin Canyon Landscape
- Solstice Canyon
- Will Rogers Ranch (Landscape)
- Adamson House (Landscape)
- Transportation Corridors
- Ethnographic trade routes
- Mulholland Highway Scenic Corridor
- Pacific Coast Highway/Roosevelt Highway
- Malibu/Las Virgenes
- Decker Canyon
- Potrero Road/Long Grade Canyon 180
- Old Topanga Canyon
- El Camino Real
- Cahuenga Pass/Campo de Cahuenga
- Terminus of Route 66 (at Santa Monica Pier)
- De Anza Trail
- Portola Sacred Expedition 1769
- Hueneme, Malibu, Port Los Angeles Railroad
- Other Historic Transportation Routes
- Hidden Valley Cooperative Planning Area
- Lake Sherwood Cooperative Planning Area
- Topanga Canyons Developed Area
- Malibu/Monte Nido Developed Areas
- Malibou Lake Developed Area
- Pacific Palisades
- Other Designed Landscapes

## *Fire Impacts on Cultural Resources*

A summary of direct, operational, and indirect fire effects is presented below, followed by an explanation of the measures chosen for the types, duration and intensity of impacts described in the impacts analysis section (4B, page 4-55).

### Direct, Operational, and Indirect Effects

#### *Direct Effects*

As summarized in Appendix B, cultural resources vary in terms of their susceptibility to direct fire effects. For example, obsidian hydration rinds are generally impacted at temperatures in excess of 100 to 150° C, dimensional lumber ignites at 350° C, glass melts at around 500° C, and cast iron at 1400° C. Duration of heating is less well understood, but in general, the longer a resource is exposed to heat, the greater the likelihood of damage. Fire can result in the complete elimination of an artifact or feature (e.g., through consumption) or can alter attributes of an artifact or feature such that important research (e.g., obsidian hydration rinds, residues on pottery, bone burning), traditional (e.g., Native American spiritual sites) or other values are impacted.

Fires tend to burn in a complex manner depending on fuels, weather, and terrain (Ryan and Noste, 1985). Fire intensity is generally greater under conditions of heavier fuel (e.g., dead and down trees, brushfields), low fuel moisture, high air temperatures, high winds, low humidity, and/or rugged terrain. It is the behavior of a fire (ground, surface, and crown) and proximity to a cultural resource that will determine the amount and type of damage that could occur. While running surface fires and crown fires reach extreme temperatures (500 to 1500° C) and have high energy release rates, relatively little of that heat is directed towards the surface of the ground, and ground fires can result in long duration heating (400 to 700° C) within the upper 15 cm of the soil profile. Only under rare conditions (e.g., burning tree roots) will elevated temperatures penetrate more deeply beneath the ground surface. Ground and creeping, and active surface fires are usually associated with prescribed burns, whereas running surface and crown fires occur primarily during wildfires. Very generally, cultural resources located above the ground surface (e.g., rock imagery panels, historical structures) are most vulnerable to direct fire effects during crown and active surface fires, while ground and creeping surface fires threaten those found at, or just below, the ground surface (e.g., archeological sites).

#### *Operational Effects*

Operational effects to cultural resources are most likely to occur as a result of fire management actions associated with prescribed burns, wildfires, and mechanical thinning. The operational effects on cultural resources have been quantified in relatively few cases. However, several generalizations can be made:

- Impacts resulting from the operation of heavy equipment on, and in close proximity to, cultural resources will correlate directly with the nature and extent of the disturbance, nature of local sediments, and nature and extent of cultural resources.
- With the exception of those that result in more intense fire behavior (e.g., slash piles,

firing techniques), impacts resulting from operational effects will generally be restricted to the displacement, breakage, and/or destruction and looting of cultural resources. In this sense, operational effects tend to be less encompassing than direct effects. For example, an obsidian projectile point displaced by construction of a fire line will probably retain its hydration rind, morphology, and other attributes.

- Except in rare situations, operational effects are likely to be most pronounced on cultural resources found on and near the ground surface.
- Operational effects will be most likely to occur, and at the greatest intensity, during wildfires. This is due primarily to the fact that such actions are often carried out with little or no pre-planning and without consultation or supervision by a cultural resource specialist.

### ***Indirect Effects***

Indirect effects are perhaps the most elusive of all, since the impacts may be delayed and incremental. The potential for indirect effects will relate strongly to the context in which a cultural resource is found, the nature of that resource, and the type and extent of the disturbance activity. In most cases, intense fire behavior and major suppression efforts associated with wildfires will render cultural resources vulnerable to indirect effects soon after the event. Indirect effects may not be as pronounced following managed actions such as prescribed burns or mechanical thinning, but can, given enough time, have equally adverse consequences.

### **Type of Impacts**

In general, direct effects of fire management actions on cultural resources will be adverse. This is particularly true of archeological resources, structures, and museum objects. While direct fire effects can also adversely impact ethnographic resources and cultural landscapes, fire can also be used to restore, enhance, and maintain them. For example, in regard to ethnographic resources, some plants important for basketmaking benefit from the proper application of fire (Anderson, 1999). In cultural landscapes with a vegetation component, fire can be applied to replicate and maintain historic scenes. Adverse direct effects are more likely to occur during extreme fire behavior such as wildfires, although cultural resources with high vulnerability to fire are susceptible to low intensity burns often associated with prescribed fire.

Operational effects of fire management actions on cultural resources will, in most cases, be adverse. However, the degree of impact depends greatly on the nature of the operation and the cultural resource or resources in question. Adverse operational effects are of particular concern during and after wildfire events. With proper planning, operations can also be used for beneficial purposes. For example, mechanical thinning can effectively remove hazardous fuels from, and in the vicinity of, cultural resources, as well as restore, enhance, or maintain ethnographic resources and cultural landscapes, in cases where the risk of direct effects is too high.

Finally, the indirect effects of fire management actions generally adversely affect cultural resources, especially those that follow high intensity wildfires.

### Duration of Impacts

With respect to archeological resources, structures and cultural landscapes, short and long term impacts related to fire management actions are distinguished based on the number of years (10 and 20, respectively) before effects manifested following the action. These numbers were selected somewhat arbitrarily, and subject to revision as monitoring data are gathered. Impacts of short and long term duration differ from those of permanent duration, where significant characteristics of a resource of interest are irrevocably compromised during the action. Intervals utilized for ethnographic resources and museum objects are configured somewhat differently given variations in the use and nature of these resources.

The duration of direct, operational, and indirect effects on fire management actions is influenced strongly by the nature of the action and fire intensity. For example, a high intensity wildfire will tend to result in more adverse permanent effects than a low intensity prescribed burn. Likewise, a suppression effort using heavy equipment has a higher likelihood of more adverse operational and indirect effects than one with hand lines. Adverse effects resulting from fire management actions vary in regard to timing. For example, some archeological resources will be totally consumed by the burn, while others will be modified such that deterioration will occur more rapidly following the burn. Ethnographic resources and cultural landscape features may recover slowly following fire management actions. However, fire can also be used to protect certain cultural resources by reducing adjacent fuel loads, or, in the case of ethnographic resources or cultural landscapes, restore, maintain, and/or enhance them.

### Intensity of Effects

The intensity of direct fire effects is difficult to quantify. This is due in part to the poor understanding of these effects, as well as the apparent differential vulnerability of the various cultural resource classes. Because of this, it is probably better to consider potential direct effects to individual components of a particular resource class (e.g., flaked stone, groundstone, bone, shell in a Native American village) rather than the resource class as a whole (e.g., lithic scatters, villages, trash scatters, mines for archeological resources). As noted, however, even within individual components, direct fire effects differentially impact various attributes of a particular artifact or feature type. For example, potential direct fire effects on an obsidian artifact include alteration of the obsidian hydration rind, inability to chemically source, breakage, melting, discoloration, and elimination of organic residues, each of which can occur at different temperatures and/or duration of exposure.

Ideally, an assessment of the intensity of potential direct effects on cultural resources at SMMN-RA would be conducted in conjunction with fire temperature data for each fuel model/vegetation community, detailed fire history studies, and accurate inventory of the types and distribution of cultural resources found in the unit. Unfortunately, this is not the case. While computer models predicting the intensity and severity of fire behavior based on a number of variables are available, predicting direct fire effects on cultural resources from the outputs is not well developed. For example, most experiments measuring the effects of fire on cultural resources utilized tem-

perature as the agent of change, while computer models provide estimates of fire line intensity in non-comparable British Thermal Units (BTUs).

Still, some generalizations can be put forth with regard to evaluating potential direct fire effects. In most cases, the greater the fuel load, the more intensely a fire is likely to burn (DeBano et al., 1996:56). Table 3-12 depicts the distribution of recorded archeological sites in SMMNRA with respect to dominant vegetation communities. The majority of sites are found in chaparral and coastal sagebrush communities, which are also the dominant vegetation communities in SMMNRA. Anticipated fire behavior in these communities is expected to be moderate to high depending on weather conditions and other factors. While temperature thresholds above which various classes or attributes of cultural resources can be adversely effected are not readily identifiable, it can be assumed that highly vulnerable data like wooden structures and features and organic residues have the potential to be impaired at even the lowest fire intensities, and fires in chaparral will have the potential to impart the greatest damage.

Table 3-12 Distribution of Known Archaeological Sites by Vegetation Type

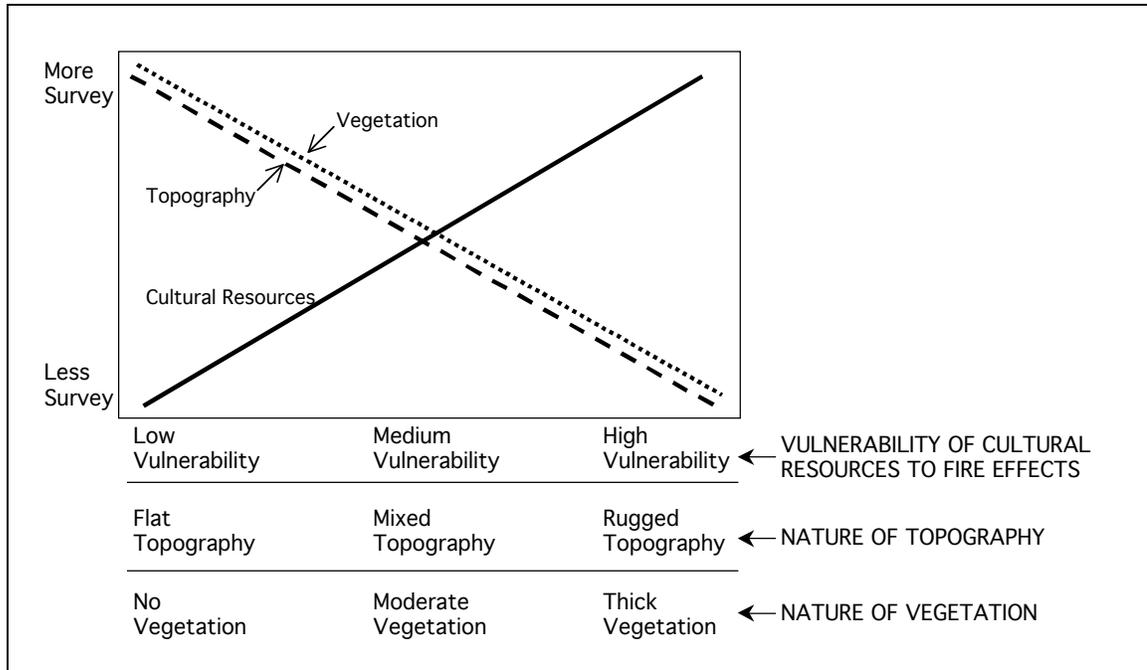
Vegetation Type	% Arch. Sites	% Total Area	Relative Proportion of Archaeological Sites to Land Area
Agriculture/development	24.5	12.9	1.9
Chaparral <sup>1</sup>	26.8	54.4	0.5
Coastal Sage Scrub <sup>2</sup>	30.4	22.4	1.4
Woodlands and Oak Savannah <sup>3</sup>	10.2	5.4	1.9
Non-native Grassland <sup>4</sup>	7.4	3.9	1.9
Rock outcrops	0.6	0.3	2.0
<sup>1</sup> chamise chaparral, northern mixed chaparral, red-shank chaparral			
<sup>2</sup> coastal sage scrub, coastal cactus scrub, coastal dune/bluff scrub, css-chaparral transition, coastal strand			
<sup>3</sup> coast live oak, riparian, valley oak, walnut			
<sup>4</sup> non-native grassland, non-native grassland/herbaceous			

Past fire activity is relevant in assessing potential direct effects in that fuel loads can be influenced by the frequency of fire. Fire history data reveal that fires have occurred on or near most cultural resources in SMMNRA. Inferences about past fire frequency can also be drawn from topographic variables such as aspect and slope. For example, fire frequency is usually greater on steep, south facing slopes than other orientations.

The accuracy of previous cultural resources surveys at SMMNRA has probably been influenced by a combination of thick vegetation and rugged topography. Ironically, those areas that are most easily traversed (low gradient topography, sparse vegetation) will usually support less

intense fire behavior than steep and/or heavily vegetated locations (Figure 3-27). While areas with low topographic gradient were probably the most attractive for settlement, some activities (e.g., mining) were carried out without regard to such considerations. The implication is that it will often be difficult to locate and adequately document cultural resources in areas of thick vegetation and/or steep topography, and that such resources will be highly vulnerable to direct fire effects.

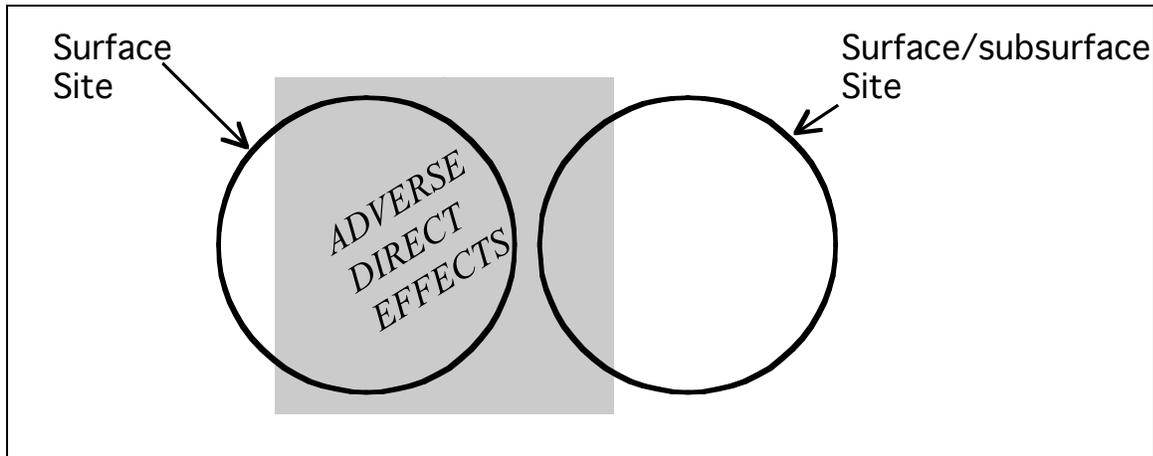
Figure 3-27 Relationship Between Survey Coverage and Vulnerability of Cultural Resources to Fire Effects, Topography, and Vegetation



The volume or extent of a cultural resource vulnerable to direct fire effects also merits consideration. As noted, except under special circumstances, direct fire effects will generally be restricted to those cultural resources found above, on, and slightly below the ground surface. As such, all else being equal, the classes and attributes of cultural resources found exclusively on or near the ground surface are prone to have a greater percentage of their number adversely impacted by direct fire effects than those resources with a combination of surface and subsurface material. This is significant because cultural resources generally considered to have high data potential, such as Native American villages with subsurface components, may actually have a far lower percentage of artifact classes or attributes exposed to direct fire effects than a lithic scatter, often considered to have low data potential, that is restricted to the ground surface (Figure 3-28). While it is the village that would probably receive the greatest amount of attention in regard to a planned or unplanned fire management action, it is the lithic scatter that has the potential to undergo the greatest intensity of impact.

Figure 3-28 Susceptibility of Cultural Materials in Surface and Surface/Subsurface Contexts to Direct Fire Effects

*Open circles reflect the full range of artifact classes/attributes represented at each site type, and the amount of overlap with the shaded circle represents the amount or percentage of artifact classes/attributes vulnerable to adverse effects.*



Determining if and/or to what extent a cultural resource has subsurface components is best accomplished through invasive (e.g., excavation, auguring) or non-invasive (e.g., remote sensing, cut bank inspection) means. Relatively few of these studies have been carried out at sites in SMMNRA. While people do intentionally and unintentionally bury cultural materials (e.g., trash dumps, yucca ovens, burials), it is geomorphological processes that dictate whether a given cultural resource is likely to have a subsurface component. In general, toeslopes, footslopes, and terraces will have greater accumulations of colluvium and alluvium than summits and sideslopes, from which these sediments are eroding. It is suspected that these processes are particularly pronounced in some locations at SMMNRA. In the absence of invasive or non-invasive investigations, inferences about the presence and extent of subsurface components can be drawn based on the geomorphological context in which a resource is found.

## VI Social Environment

### A Land Use

The SMMNRA exists as a mosaic of parklands and private land holdings across more than 150,000 acres in southern California. The park boundary extends through both Los Angeles and Ventura Counties and includes all or portions of the communities of Agoura Hills, Calabasas, Beverly Hills, Malibu, Pacific Palisades, Thousand Oaks, Topanga, Westlake Village, and Los Angeles. This complex array of land uses, land owners, and jurisdictions strongly influences fire risk and fire management options.

Development in and around the SMMNRA has created an unprecedented wildland urban inter-

face amid the highly fire prone landscape of the Santa Monica Mountains. Residential developments occur throughout the park, including high-density subdivisions along with more scattered rural homes on larger lots. Generally, higher-income populations live in these areas since property values are higher than in the more developed suburbs and urban areas nearby. Agricultural uses exist in some parts of the mountains, including large horse ranches and small-scale agriculture (e.g., vineyards). However, commercial agriculture is not common in the park. Industrial and commercial uses comprise a relatively small percentage of the area's existing land use. Throughout the mountains, commuter roads servicing residential developments are also common and two multi-lane freeways parallel and bisect portions of the park, U.S. Highway 101 and Interstate 405. At the same time, over half of the land area in the SMMNRA is protected as parkland, interspersed within the human developments and roads.

The extensive development interface provides numerous fire management challenges. The combination of highly combustible vegetation types, periodic extreme fire weather conditions, and the potential for substantial life and property losses during wildfires mean that park managers, fire management agencies, and local jurisdictions must work together to identify realistic fire management actions that reduce fire risk and protect environmental values.

To reduce fire risk in the developed interface and around structures, local jurisdictions require brush clearance zones and compliance with various fire safety ordinances. In some cases, to maintain adequate brush clearance requires vegetation removal from parklands and other sensitive resource areas. Thus, the ecological consequences of vegetation clearance must be evaluated against information on fire risk and behavior, fuel type, local jurisdiction requirements, and values at risk. Vegetation clearance is clearly important near developed areas and around structures, however, excessive clearance can also impart significant ecological impacts with only slightly improved or negligible improvements in fire hazard reduction. For example, substantial fuel modification and firebreaks have already altered much of the landscape in the Santa Monica Mountains. At the same time, adequate clearance around structures and developments appears to be the most effective way to reduce fire hazard and generally results in fewer impacts than wide scale vegetation clearance far from developments and within undisturbed vegetation. The key is to identify strategic zones for fuel modification that result in the greatest hazard fuel reduction with the least environmental impact.

In addition to vegetation clearance, complex land use patterns and human influences in the SMMNRA also affect fire suppression techniques and associated impacts. With developments scattered across much of the landscape, no wildfire is permitted to burn; full suppression is always employed. Steep-sided canyons and narrow mountain roads constrain access for people and suppression resources, making fire fighting especially challenging and dangerous. Environmental costs of suppression can also be high, with control lines and heavy equipment sometimes leaving long-term scars on the landscape. Suppression-related disturbances can also facilitate exotic species invasions and contribute to erosion if not properly mitigated.

Land use pattern and human activities also contribute to the risk of fire in the SMMNRA

because of human-caused ignitions. For example, nearly all large fires (i.e., greater than 10,000 acres) in the mountains since detailed records were kept (beginning in 1925) have been human-caused, either directly or indirectly. Ignition sources have included downed power lines during high wind conditions and direct fire starts from arson. Because of the complex patterns of human development and easy access to the mountains by people, human-caused fires can and have occurred throughout the range. However, observations of fire history maps do suggest that regions of high development prevalence (e.g., along the 101 freeway corridor) tend to produce higher ignition frequencies. As development continues across the mountains one can expect ongoing threats from human-caused wildfire ignitions.

The existing patterns of human development in the SMMNRA interact to result in this challenging array of hazard reduction concerns, fire suppression issues, and ignition source risks. Ongoing development continues, generally guided by established land use plans within each of the local jurisdictions. Although specific land use designations vary by jurisdiction, all distinguish between areas of future development and current open space. Fire management activities, such as hazard fuel reduction zones or suppression actions, have the potential to directly affect developments. Conversely, developments have an impact on fire suppression agencies' abilities to suppress fires as well as provide fire protection services to all the structures that may require suppression efforts during an incident. As a result, the future patterns of development will strongly influence interactions between fire risk, fire management options and consequences, wildfire effects, and environmental quality.

## **VI Social Environment**

### **B Recreation**

The fire risk potential and effects of humans on fire management in the SMMNRA are also influenced by recreational use of the park. Recreation users in remote parts of the mountains can be exposed to risk if evacuations are necessary, particularly during extreme fire weather conditions. In some instances, park managers will choose to close park sites to ensure visitor safety during extreme weather (i.e., strong Santa Ana winds). Conversely, access to remote areas by park users may increase the likelihood of human-caused ignitions in the park, either through unintentional or intentional fire starts.

Throughout the mountains, park sites are heavily used by recreation enthusiasts. Hikers, mountain bikers, and equestrians use literally hundreds of miles of trails. Many park sites accommodate picnickers and some sites offer camping opportunities and locations for special events. In general, visitors come to the parklands to enjoy the area's unique natural, cultural, and scenic resources. Wildfires, fire suppression activities, and fire management actions can affect the ability of park users to access and enjoy the park, and can also affect the scenic qualities of the SMMNRA.

Extensive vegetation clearance and fuel modification zones necessarily remove native vegetation, impacting visual qualities. Prescribed burns can also affect scenic resources by removing

visually pleasing vegetation and creating bare areas for control lines and staging areas. For these reasons, planned burns are often scrutinized by the public in terms of the visual effects they may have on park resources. During wildfire events, suppression activities may also leave lasting imprints on the landscape. In addition, high intensity fires may affect vegetation regeneration and frequent fires (including prescribed burns) may lead to type conversion to less visually desirable non-native grasses.

For all fire management actions, including wildfire suppression and control of prescribed burns, control lines and mechanical clearance can lead to trail proliferation. These impacts affect visitor experiences by degrading visual qualities and can facilitate unauthorized access by people into environmentally sensitive areas. This access, in turn, can further reduce resource values by increasing erosion and aiding the invasion of non-native species.

Overall, the importance and prevalence of visitor uses throughout the mountains are influenced by the effects of fire, fire management actions, and fire risk. The NPS and other agencies must consider these interactions when developing fire management and suppression actions, and when evaluating the effects of mechanical fuel reduction, prescribed fire, and wildfire effects on park resources and visitor experience.



## Chapter Four

# IMPACTS OF ALTERNATIVES

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## I Methodology and Thresholds of Significance

### *Introduction*

In analyzing the environmental consequences of the alternatives proposed in the *Draft Santa Monica Mountains Fire Management Plan/Environmental Impact Statement (EIS)*, three factors are examined for each resource: type of impact, duration of impact, and intensity of impact.

The type of impact describes a relative measure of beneficial or adverse effects on biological or physical systems, cultural resources, or on the social environment. For example, adverse impacts on ecosystems might be those that would degrade the size, integrity, or connectivity of a specific habitat. Conversely, beneficial impacts would enhance ecosystem processes, native species richness, or native habitat quantity or quality.

Impacts from fire management activities may be either short-term or long-term, and it is therefore important to look at the duration of an impact.

Examining the type and duration of an impact is not enough because an impact could cover a large area or a large portion of a population or could be highly noticeable or even irreversible. Impacts are of varying intensities from small and imperceptible to large and substantial. Measures of intensity consider whether an impact would be negligible, minor, moderate, or major. These designations are used to describe both beneficial and adverse impacts.

For each resource topic the impacts associated with each type of fire management action proposed in the alternatives are evaluated. The alternatives, which represent a nested hierarchy of fire management actions, are then evaluated and compared.

In addition, the impact of implementing the alternatives proposed for National Park Service (NPS) lands are analyzed in combination with the impacts of other relevant actions in the area in the cumulative impacts analysis. A cumulative impact is described in the Council on Environmental Quality regulations (40 CFR 1508.7) as: “*the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions.*” Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

The impact analysis also evaluates whether resources might suffer impairment. Impairment is not

a National Environmental Policy Act (NEPA) issue but instead relates to the *National Park Service Organic Act* (1916). Impairment that is prohibited by the NPS Organic Act is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. Nonetheless, an impact is less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values.

According to NPS Policy,

*“An impact would be more likely to constitute an impairment to the extent that it affects a resource or a value whose conservation is: a) Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; b) Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or c) Identified as a goal in the park’s general management plan or other relevant National Park Service planning documents.”* (NPS Management Policies, Part 1.4.5)

## II Regulations and Policies

### **Air Quality**

The federal 1963 Clean Air Act (42 U.S.C. 7401 et seq. as amended), stipulates that federal land managers have an affirmative responsibility to protect a park’s air quality related values (including visibility, plants, animals, soils, water quality, cultural resources, and visitor health) from adverse air pollution impacts. The Santa Monica Mountains National Recreation Area (SMMNRA), is designated as a federal Class II airshed. Air quality would be affected in the short-term during any type of ignition event; therefore, it is analyzed as a relevant impact topic.

### **Water Resources**

NPS policies require protection of water resources consistent with the Clean Water Act. Increased erosion following a fire event, planned or unplanned, may affect water quality within and outside of the recreation area; therefore, it is considered a relevant impact topic.

### **Topography and Soils**

NPS policies and Special Directive 91-6 require the consideration of impacts on topography and soils. Soil types within the SMMNRA are highly erosive and subject to post-fire flash flooding, therefore, this is considered a relevant impact topic.

### **Biotic Communities**

The NEPA (1969) requires analysis of impacts on all affected components of the ecosystem, including biotic communities of plants and animals. NPS Management Policies (1988) requires maintenance of these communities, including their natural abundance, diversity and ecological integrity. Fire plays an important role in changes to vegetative cover which in turn affects habitat and overall ecological health; therefore, effects on vegetation and wildland fire are analyzed as an impact topic.

### **Species of Special Concern (Threatened, Endangered, Candidate, and Rare Species)**

The Endangered Species Act (1973) requires disclosure of impacts on all federally threatened or endangered species. Adoption of the *SMMNRA Fire Management Plan* will require consultation with the USF & WS in accordance with Section 7(a)(2) of the Endangered Species Act. NPS policy also requires analysis of effects on federal species, as well as state-listed threatened, endangered, candidate, rare, declining and sensitive species. There are several plant and animal species of concern within the SMMNRA which may be affected by fire management activities; therefore, this is analyzed as a relevant impact topic.

### **Cultural Resources**

The National Historic Preservation Act, as amended in 1992 (16 USC 470 et seq.); NEPA; and the *NPS Cultural Resource Management Guidelines* (1994), and Management Policies (1988) require the consideration of impacts on cultural resources listed on or eligible for listing on the National Register of Historic Places. The undertakings described in this document are also subject to section 106 of the National Historic Preservation Act, under the terms of the 1995 Programmatic Agreement among the NPS, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers. Impacts to cultural resources (archeological, historic, and paleontological) are therefore analyzed in this environmental impact statement. (see ASHFAP appendix).

### **Native American Graves Protection and Repatriation Act and Consultation Process**

NPS and other federal regulations and policies concerning Native American resources and federal trust responsibilities require assessment of impacts to these resources within a framework of government-to-government consultation with affected tribes. This environmental assessment will be reviewed by the the Santa Ynez Band of Mission Indians, as well as by local Chumash and Tongva/Gabrielino groups and individuals who are not federally recognized. It will also be made available to others as requested. Archeological surveys would be completed prior to any prescribed burning or mechanical treatment, as described in mitigation measures common to all alternatives.

### **Land Use (Proposed Wilderness, External Development, Special Use Permits)**

The Wilderness Act (1964), NEPA (1969), and NPS Management Policy requires assessment of effects on wilderness values. There are no designated wilderness areas on federal parklands in the Santa Monica Mountains and the effects of fire management on wilderness values are therefore not included as an impact topic.

NEPA requires identification of potential conflicts with local, state and other federal land use planning, policies, and regulations.

### **Visitor Use**

The mission of the NPS, as described by its Organic Act of 1916, defines the purpose of all parks is to “...*conserve the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same ...*” Scenic (visual) values, recreational activities, and general visitation within and around fire-treated areas may be temporarily impacted, thus visitor use will be considered as an impact topic.

### **Socioeconomics**

The National Environmental Policy Act (NEPA) considers “impacts to the human environment” to include any effects of federal actions on the social and economic well-being of communities and individuals. The management actions proposed within the park would not generate new jobs and income within the local community; however, some fire personnel may come from outside the area on a temporary basis to assist park staff with a fire event. This impact would be negligible to communities surrounding the park, therefore, it is eliminated from further analysis.

### **Floodplains and Wetlands**

The NPS guidelines and policies require consideration of impacts on floodplains and wetlands (Executive Orders 11988 and 1190).

## **III Impact Topics Considered and Dismissed**

### **Prime and Unique Farmlands**

The California Environmental Quality Act (CEQA) requires an assessment of impacts to all prime and unique farmlands within the project area (August, 1980). These resources do not exist on parklands, therefore, this was not considered a relevant impact topic.

### **Environmental Justice**

Executive Order 12898, “*General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,*” requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their actions on minorities and low-income populations and communities. The proposals contained in the *SMMNRA Fire Management Plan* would not have adverse impacts on minorities and low-income populations and communities; therefore this topic is not addressed further.

## **IV Impact Topics**

### **A1a Biological Resources –Vegetation**

#### *Thresholds of significance*

Impacts are evaluated by analyzing changes in the structure and composition of the vegetation in the dominant plant community types.

#### Type of Impact

- Adverse: Moves the system away from the natural range of variability for vegetation structure and species composition.
- Beneficial: Moves the system towards the natural range of variability for vegetation structure and species composition.

### Duration of Impact

Short-term: Transitory, 2-5 years  
Long-term: Irreversible, 50-100+ years

### Intensity of Impact

Negligible: Imperceptible or undetectable effects upon vegetation.  
Minor: Slightly perceptible and localized effects.  
Moderate: Measurable change in plant community structure and composition; changes in ecosystem processes (e.g., fire, nutrient cycling, hydrology) on a localized level.  
Major: Substantial change in plant community structure and composition; changes in ecosystem processes (e.g., fire regime, nutrient cycling, hydrology) on a landscape scale.

### *Proposed Actions*

#### Wildfire Suppression

Wildfire suppression occurs for all wildfires within the SMMNRA. Under the existing program of complete wildfire suppression, fires occur that range in size from 0.3 acres to 43,043 acres, with a median fire size of 76 acres. The current anthropogenically dominated fire environment has drastically reduced the average fire return interval in the Santa Monica Mountains to 32 years. This is significantly lower than the 100+ interval that would be expected with infrequent natural lightning ignitions. There is no threat to vegetation diversity, composition or structure from excessively long fire return intervals in the Santa Monica Mountains, but type conversion from an unnaturally short fire return interval has been documented. Wildfire suppression is therefore interpreted as generally beneficial to vegetation to the degree that it limits the amount of area burned with increased wildfire frequency.

Despite the most intensive suppression efforts, large fires are an infrequent, but re-occurring event. Suppression is effective in limiting the size of fires under mild and moderate climactic conditions, but is less successful for fires that start in extreme weather conditions. More vegetation may therefore burn under intense conditions than under a more natural fire regime, but in the absence of controlling fire to reduce fire frequency starts (especially arson and power lines), there is little that can be done to limit this impact.

Operational effects associated with wildfire suppression can often be extreme. The act of constructing fire lines, helispots, staging areas, mopping-up and other ground disturbing processes can impact vegetation by killing mature plants, reducing post-fire reproduction through destruction/disturbance of the seed bed, or destruction/disturbance of underground reproductive structures (e.g., burls, bulbs, rhizomes). Suppression operations also create conditions that are favorable to non-natives which may invade fire lines and displace native species. Depending on the vegetation type and the operational methods used, the effects may be short lived if mature plants

resprout and there is vegetative or seed regeneration, or they may be long term if the impacts are sufficient to create type converted or permanently degraded habitat types. Although the use of heavy equipment for fire suppression is prohibited unless authorized by the Santa Monica Mountains superintendent, it is a standard tool for agencies charged with fire management on adjacent lands, and would almost certainly be employed in cases where life or property is at risk.

### Mechanical Fuel Reduction

Mechanical fuel reduction in coastal sage, chaparral or woodlands on park properties is generally done with hand tools (chain saw, loppers, weed whips). Dead material and flashy fuels are removed, the density of shrubs is reduced, and trees and large shrubs are limbed up. In grasslands, a tractor pulled disker plows up the annual grasses and forbs in late spring. A total of 90 acres on NPS property is treated with mechanical fuel reduction. These sites are located at the wildland urban interface where pre-existing development requires fuel modification on parkland to provide a defensible space around structures on adjoining private property or around park structures (Figure 2-1, Table 2-4). The vast majority of treated acreage is annual grassland that has been cleared for many years and which retains little or no native vegetation. The vegetation in these areas is degraded and future activities will have no additional impact on vegetation habitat quality. The major concern with these areas is that they are sites where invasive species can become established and potentially move out into adjoining undisturbed habitat areas.

Several park properties were recently treated under the NPS WUI funding program where the local fire department and homeowners have been concerned with park vegetation. The treatment areas included high quality coastal sage scrub, chaparral and oak woodland habitat. Fuel modification in these habitats alters both the normal vegetation structure and community composition and makes the vegetation more susceptible to invasion by non-native annual grasses. Obligate seeding species are lost as the mature plants are removed and there is no fire-stimulated seedling regeneration. To minimize vegetation degradation, only those areas that fall within 200' of residential structures will continue to be maintained as a fuel modification zone. NPS will develop a clear policy statement and procedures to assess existing and potential fuel modification responsibility for properties at the private/public interface with federal parkland. See Appendix A for example.

### Ecological Prescribed Fire

Although prescribed fire is unnecessary for ecological health at the landscape level in the shrubland vegetation types in the Santa Monica Mountains, fire may be an effective tool to restore degraded vegetation types. In particular, it can be used to control invasive non-native species or to shift the competitive balance in favor of native over non-native species. Ecological prescribed fire is being used in Cheeseboro Canyon to reduce the non-native seed bank as part of a native grassland and coastal sage scrub restoration project.

A maximum of 275 acres/project with a maximum of 4 projects/year is proposed for ecological prescribed fire. Areas that are potential restoration sites have been identified by overlaying annual grassland and oak savanna vegetation types onto park properties (Figure 2-2, Table 2-3).

## Strategic Fuel Reduction

It is not possible to evaluate the vegetation impacts of the strategic fuels reduction alternative without a geographically specific project proposal. The analytical procedure required to evaluate the potential risk: benefit ratio has been outlined in the discussion of fire hazard assessment (Figure 3-17).

A maximum of 2 projects/year with 150 acres/project is proposed based on what is realistically achievable for park staff and NPS partners. Because specific strategic fuel reduction sites have not been identified, each project will require an individual environmental assessment.

## Education and Community Support

Education will have positive benefits in preserving the native vegetation of the SMMNRA where it can be used to teach residents appropriate fire safe landscape management techniques. These include appropriate fuel modification techniques that preserve native species; use of appropriate native landscaping; avoidance of non-native plants that increase fuel load; limited use of irrigation; slope preservation; and appropriate structure siting to limit the size of the fuel modification zone.

Any education or community outreach program that effectively reduces fire ignitions will provide a significant benefit by reducing fire frequency. Prevention measures might include closing parklands during extreme weather, no camp fires during fire season, and evaluation of road clearing projects. Efforts to effectively address prevention of fires started by arson and power lines are critical.

## *Summary by Alternatives*

### Impacts Common to All Alternatives

Wildfire suppression impacts are common to all alternatives. Wildfire suppression has a beneficial impact on vegetation diversity, composition and structure because it reduces the amount of area repeatedly burned in the high fire frequency environment of the Santa Monica Mountains; it is a long-term effect that permanently affects the trajectory of vegetation succession; it has a moderate impact in that it is effective for small to moderate fires, but may not be effective in preventing the largest fires. Operational impacts of wildfire suppression are adverse due to ground disturbance and vegetation destruction; they may be short term or long-term depending on the vegetation type, operational methods, and post-fire rehabilitation treatment; operational impacts may be of moderate intensity because effects are measurable and localized, and occur across the landscape with repeated fires.

Fuel modification impacts are also common to all alternatives. Impacts to vegetation diversity, composition and structure from fuel modification are adverse, long-term, and of moderate intensity. However, the majority of the impacts for the project areas covered by this *Draft SMMNRA Fire Management Plan* have occurred from past maintenance activity and are identical among all alternatives including the no-action alternative. No new fuel modification on parkland is anticipated from new development.

Education and community outreach benefits are identical among all alternatives including the no-action alternative.

Mitigation measures are proposed to reduce the adverse impacts to vegetation from the operational impacts of fire suppression activities and fuel modification. Education efforts are recommended that balance fire protection and preservation of vegetation, especially at the wildland urban interface. Any measures that can effectively reduce the fire frequency, by preventing fire starts would be a significant benefit to the vegetation of the Santa Monica Mountains.

### **Alternative 1 – No-Action Alternative**

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential to adversely impact vegetation diversity, composition and structure. Potential impacts to vegetation from landscape mosaic burning are considered to be moderate, adverse, and long-term. No plant communities in the Santa Monica Mountains are in decline from an absence of fire and significant areas of the mountains have experienced a higher than normal fire frequency. Type conversion from a too-short fire return interval is the most significant threat to chaparral communities in the current fire environment. Increasing the amount of area burned in prescribed fires, as proposed under this alternative, increases the amount of area that is at ecological risk from subsequent wildfires with too short a return interval.

### **Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction**

The impacts to vegetation from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis. Benefits to vegetation would occur on a landscape level if the technique were successful in limiting the amount of area burned, thereby increasing the fire rotation interval with more effective control of fire spread. Adverse impacts to the areas of treated vegetation would be expected from either mechanical clearing or a high frequency prescribed fire return interval.

### **Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction**

Impacts to vegetation diversity, composition, and structure from ecological prescribed fire are beneficial, long-term, and moderate when this management technique is used as part of the park's program to restore degraded habitat types.

### **Alternative 4 - Mechanical Fuel Reduction**

Impacts to vegetation from mechanical fuel reduction are considered to be negligible because it is an ongoing activity with no increase in the amount of affected area over the no-action alternative. Impacts are identical among all alternatives.

## Conclusions

Alternative 2 is the environmentally superior alternative because it avoids the adverse impacts of the No-Action Alternative (Alternative 1), includes the benefits of Alternative 3 and the common impacts of Alternative 4. It includes strategic fuel modification as a fire management technique which has both potential benefits and adverse impacts that will need to be evaluated with a project-specific Environmental Assessment (EA).

## *Mitigation Measures*

### Wildfire Suppression – Operational Impacts

- 1) Existing roads, fuel breaks and trails should be used for fire lines; new line construction should be limited to the greatest extent feasible.
- 2) Sensitive habitats that could be impacted by operational activities should be identified by NPS on a GIS database and made available at the Incident Command Post. Fire operations should avoid sensitive habitat areas, especially streams and woodlands, where feasible and in accordance with the guidelines in Appendix C.
- 3) Trees should be preserved during line construction and other operations requiring vegetation clearance.
- 4) NPS GIS weed maps should be made available at the Incident Command Post. Suppression activities that could promote weed spread should be minimized. Fire lines should be restored to natural grade and to conditions that will encourage native plant growth and avoid weed invasions. Monitor for weed invasion from fire activities and provide for removal if necessary. See Appendix E for invasive species of the SMMNRA and the park's proposed weed management plan.

### Fuel Modification

- 1) All park fuel modification zones should be monitored for the presence of serious invasive plant species. Species known to be aggressive invaders of wildland areas, particularly perennial herbs and shrubs, should be controlled as part of the mechanical fuel treatment activity. See Appendix E for invasive species of the SMMNRA and the park's proposed weed management plan. Where topography permits, annual grasslands should be mowed rather than disked.
- 2) Adopt State Park's policy as a joint agency policy for fuel modification on park properties where potentially required to provide protection to private property (Appendix A).
- 3) NPS should continue to consult with Los Angeles and Ventura County Fire Prevention and Planning Departments on structure siting so that no vegetation clearance on park property will be required to ensure fire safety to new development adjoining park properties.
- 4) Defensible space zones should assure the greatest level of protection for life and

property possible. The benefits and impacts of 100' vs. 200' clearances should be analyzed. NPS personnel should analyze the potential cumulative habitat impacts of any fuel modification that exceeds the amount necessary to protect structures.

### Education and Outreach

- 1) The NPS and other agencies should continue to co-operate and improve outreach methods to inform residents about appropriate fuel modification techniques to preserve native species; the use of appropriate native landscaping; the importance of limiting non-natives that increase fuel load; the importance of limiting irrigation; the importance of preserving slope vegetation; and appropriate structure siting to limit the size of the required fuel modification zone.
- 2) The NPS and other agencies should continue to co-operate in all activities that promote fire prevention in order to reduce fire frequency. Direct park actions include park closures during extreme weather and appropriate limitations on camp fires. The NPS should continue to evaluate the cause of fires and support projects that effectively limit fire starts especially arson and power line ignitions.
- 3) Road clearing projects should be evaluated for effectiveness in meeting clearly defined objectives.

## **IV Impact Topics**

### **A1b Biological Resources – Wildlife**

#### *Threshold Criteria*

Fire has been a strong force in the formation of the vegetation that by its structure, distribution, and diversity provides wildlife habitat in the Santa Monica Mountains. Many of the native wildlife species have behaviors or life history characteristics that avoid or are tolerant of fire and the post-fire changes in their habitats. As changes in plant species composition progresses following fires, there are successions of animal species that are favored or disfavored as the plant community changes.

Fire in the Santa Monica Mountains is now more frequent, with a shorter fire return interval, than occurred under natural ignition conditions. The historic pattern of fire has also fluctuated with climate and with the use of fire by native Americans. Finally, the landscape is also more fragmented than in the past. The individual and combined effects of the changes in the fire regime and land use patterns on wildlife are not known. In addition, fire control activities can adversely affect wildlife through direct disturbance of animals and habitats; management actions designed to benefit habitat, such as prescribed fire, can also have adverse effects on wildlife.

#### Type of Impact

Adverse: Likely to result in unnatural changes in the abundance, diversity, and distribution

of wildlife species. Changes could occur through direct disturbance or mortality, or through destruction or alteration of habitat.

**Beneficial:** Likely to protect and/or restore the natural abundance, diversity, and distribution of wildlife species. This would occur through protection and restoration of the natural structure, succession, and distribution of habitats.

### Duration of Impact

**Short-term:** Immediate changes in the abundance, diversity, and distribution of wildlife, but a return to the original condition within 20 years, without further affects.

**Long-term:** Changes in the abundance, diversity, and distribution of wildlife that persist for more than 20 years; the potential for irreversible changes exists.

### Intensity of Impact

**Negligible:** Imperceptible or undetectable impacts.

**Minor:** Slightly perceptible, and limited in extent. Without further impacts, effects would reverse and the resources would recover.

**Moderate:** Readily apparent, but limited in extent. Without further impacts, effects would eventually reverse and the affected species would recover to previous levels.

**Major:** Substantial, highly noticeable, and affecting a large area. Changes would not reverse without active management, if at all.

## *Proposed Actions*

### Wildfire Suppression

Wildfire suppression occurs for all wildfires within the SMMNRA. Under the existing program of complete wildfire suppression, fires occur that range in size from 0.3 acres to 43,043 acres, with a median fire size of 76 acres. Despite the most intensive suppression efforts, large fires are an infrequent, but re-occurring event. The current anthropogenically dominated fire environment has drastically reduced the average fire return interval in the Santa Monica Mountains to 32 years.

Although many wildlife species avoid direct mortality in wildfires, some individuals of some species are lost. The increased fire frequency with the majority of acreage burned in high intensity fires will cause increased wildlife mortality. However, there is no evidence that there is any long-term impact on wildlife populations. The unnaturally short fire return intervals may cause shifts in wildlife species composition and abundance in degraded, type-converted shrublands. It is unknown whether shifts in native vegetation composition as the result of increased fire frequencies have an effect on wildlife populations. Wildfire suppression is interpreted as generally beneficial to wildlife to the degree that it limits the amount of area burned due to the increased wildfire frequency.

Operational effects associated with wildfire suppression can often be extreme. The act of constructing fire lines, helispots, staging areas, mopping-up, and other ground disturbing processes

can directly impact resident wildlife in nest or burrows. Wildlife may also be indirectly impacted by permanent changes in vegetation that may create conditions that are favorable to non-natives. Although the use of heavy equipment for fire suppression is prohibited unless authorized by the SMMNRA superintendent, it is a standard tool for agencies charged with fire management on adjacent lands, and would almost certainly be employed in cases where life or property is at risk.

### **Mechanical Fuel Reduction**

Fuel modification affects wildlife primarily by displacing animals by destroying or modifying habitat. Fuel modification alters both the normal vegetation structure and the plant community composition and makes vegetation more susceptible to invasion by non-native annual grasses. In shrublands and woodlands dead material and flashy fuels are removed, the density of shrubs is reduced, and trees and large shrubs are limbed up. In grasslands, a tractor pulled disker plows up the annual grasses and forbs in late spring.

A total of 90 acres on NPS property is treated with mechanical fuel reduction. These sites are located at the wildland urban interface where pre-existing development requires fuel modification on parkland to provide a defensible space around structures on adjoining private property or around park structures (Figure 2-1, Table 2-4). The vast majority of treated acreage is annual grassland that has been cleared for many years and which retains little or no native vegetation. In these areas, the normal suite of shrubland-adapted wildlife has been displaced by wildlife species that utilize annual grasslands and are tolerant of the ongoing disturbance regime.

Several park properties were recently treated under the NPS WUI funding program where the local fire department and homeowners have been concerned with park vegetation growing within 200' of private homes. These areas have been treated in high quality coastal sage, chaparral and oak woodland habitats. Fuel modification has created a more open habitat with less structural diversity. To minimize wildlife habitat degradation, only those areas that fall within 200' of residential structures will continue to be maintained as a fuel modification zone.

### **Ecological Prescribed Fire**

Ecological prescribed fire is planned only in annual grassland and oak savanna vegetation types. A maximum of 275 acres/project with a maximum of 4 projects/year is proposed. Wildlife impacts from the low intensity fires that occur in these habitat types show minimal short-term animal mortality and no long-term effects on wildlife populations. Mortality observed in a post-fire survey from the 2002, 200-acre prescribed burn in Cheeseboro Canyon included 10 rattlesnakes, and single individuals of alligator lizard, king snake, and ring-neck snake.

### **Strategic Fuel Reduction**

It is not possible to evaluate the wildlife impacts of the strategic fuels reduction alternative without a geographically specific project proposal. The analytical procedure required to evaluate the potential risk: benefit ratio has been outlined in the discussion of fire hazard assessment (Figure 3-17).

A maximum of 2 projects/year with 150 acres/project is proposed based on what is realistically achievable for park staff and NPS partners. Because specific strategic fuel reduction sites have not been identified, each project will require an individual environmental review.

### Education and Community Support

Education will have positive benefits in preserving wildlife habitat in the SMMNRA where it can be used to teach residents appropriate fire safe landscape management techniques. These include appropriate fuel modification techniques that preserve native plant species; use of appropriate native landscaping; avoidance of non-native plants that increase fuel load; limited use of irrigation; slope preservation; and appropriate structure siting to limit the size of the fuel modification zone.

### *Summary by Alternatives*

#### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Wildfire suppression has a beneficial impact on wildlife mortality and wildlife habitat quality because it reduces the amount of area repeatedly burned in the high fire frequency environment of the Santa Monica Mountains; it is a long-term effect that permanently affects habitat characteristics; it has a moderate impact in that it is effective for small to moderate fires, but may not be effective in preventing the largest fires. Operational impacts of wildfire suppression are adverse due to mortality and habitat impacts due to ground disturbance and vegetation destruction. Mortality impacts are short-term and minor. Habitat quality impacts may be short-term or long-term depending on the vegetation type, operational methods, and post-fire rehabilitation treatment; operational impacts on wildlife habitat may be of moderate intensity because effects are readily apparent, but limited in extent.

Fuel modification impacts are common to all alternatives. Impacts to wildlife habitat from fuel modification are adverse, long-term, and of moderate intensity. However the majority of the impacts for the project areas covered by this *Draft SMMNRA Fire Management Plan* have occurred from past maintenance activity and are identical among all alternatives, including the No-Action Alternative (Alternative 1). No new fuel modification on parkland is anticipated from new development.

Education and community outreach benefits are identical among all alternatives including the No-Action Alternative (Alternative 1).

The mitigation measures that have been proposed to reduce vegetation impacts are also proposed as mitigation measures to reduce wildlife habitat impacts.

#### Alternative 1 – No-Action Alternative

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential to adversely impact wildlife mortality and wildlife habitat quality. Potential impacts to wildlife from landscape mosaic burn-

ing are considered to be adverse, both short-term and long-term, and of moderate intensity. Increasing the amount of area burned in prescribed fires, as proposed under this alternative, increases wildlife mortality (short-term impact) and increases the amount of wildlife habitat that is at ecological risk of degradation from subsequent wildfires with too short a return interval (long-term-impact).

### Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

The impacts to wildlife from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis. Benefits to wildlife would occur on a landscape level if the technique were successful in limiting the amount of area burned, thereby increasing the fire rotation interval with more effective control of fire spread. Adverse wildlife habitat impacts to the areas of treated vegetation would be expected from either mechanical clearing or a high frequency prescribed fire return interval.

### Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

Impacts to wildlife from ecological prescribed fire include adverse, short-term, minor effects due to mortality in a small number of species and beneficial, long-term, moderate impacts to habitat quality when this management technique is used as part of the park's restoration program of degraded habitat types.

### Alternative 4 – Mechanical Fuel Reduction

Impacts to wildlife from mechanical fuel reduction are considered to be negligible because it is an ongoing activity with no increase in the amount of affected area over the No-Action Alternative (Alternative 1). Impacts are identical among all alternatives.

### Conclusions

Alternative 2 is the environmentally superior alternative because it avoids the adverse impacts of the No-Action Alternative (Alternative 1), includes the benefits of Alternative 3 and the common impacts of Alternative 4. It includes strategic fuel modification as a fire management technique which has both potential benefits and adverse impacts that will need to be evaluated with a project-specific EA.

### *Mitigation Measures*

#### Wildfire Suppression - Operational Impacts

- 1) Existing roads, fuel breaks and trails should be used for fire lines; new line construction should be limited to the greatest extent feasible
- 2) Sensitive habitats that could be impacted by operational activities should be identified by NPS on a GIS database and made available at the Incident Command Post. Fire operations should avoid sensitive habitat areas, especially streams and woodlands, where feasible, in accordance with Appendix C guidelines.

- 3) Trees should be preserved during line construction and other operations requiring vegetation clearance.

### Fuel Modification

- 1) All park fuel modification zones should be monitored for the presence on serious invasive plant species. Species known to be aggressive invaders of wildland areas, particularly perennial herbs and shrubs, should be controlled as part of the mechanical fuel treatment activity. Where topography permits, annual grasslands should be mowed rather than disked.
- 2) Adopt State Park's policy as a joint agency policy for fuel modification on park properties where potentially required to provide protection to private property (Appendix A).
- 3) NPS should continue to consult with Los Angeles County and Ventura County Fire Prevention and Planning Departments on structure siting so that no vegetation clearance on park property will be required to ensure fire safety to new development adjoining park properties.
- 4) To minimize fuel modification zones, the NPS and other agencies should work together to identify the amount of fuel modification required to protect structures from radiative heat loss or from loss due to direct flame impingement. The NPS should analyze the potential cumulative habitat impacts from fuel modification that exceeds the amount necessary to protect structures (e.g. 100' vs. 200').

### Education and Outreach

- 1) The NPS and other agencies should to continue to co-operate and improve outreach methods to inform residents about appropriate fuel modification techniques to preserve native species; the use of appropriate native landscaping; the importance of limiting non-natives that increase fuel load; the importance of limiting irrigation; the importance of preserving slope vegetation; and appropriate structure siting to limit the size of the required fuel modification zone.
- 2) The NPS and other agencies should to continue to co-operate in all activities that promote fire prevention in order to reduce fire frequency. Direct park actions include park closures during extreme weather and appropriate limitations on camp fires. The NPS should continue to evaluate the cause of fires and support projects that effectively limit fire starts especially arson and power line ignitions. Road clearing projects should be evaluated for effectiveness.

## **IV Impact Topics**

### **A1c Biological Resources – Habitat Connectivity**

#### *Threshold Criteria*

See A1b Wildlife, page 4-10.

## *Proposed Actions*

### Wildfire Suppression

Wildfire suppression occurs for all wildfires within the SMMNRA. Large fires are an infrequent, but re-occurring event despite the most intensive fire suppression efforts. The current anthropogenically dominated fire environment has drastically reduced the average fire return interval in the Santa Monica Mountains to 32 years.

Wildlife species that would not suffer any long-term impact from wildfire may be adversely impacted by fire in a fragmented landscape. Wildlife persistence and recovery may be substantially altered by the combined effects of fragmented habitats and fire due to: 1) the local disappearance (extinction) of some species in fragmented areas that have burned; 2) the inability of some species to respond to and recover from fires because of the decrease in escape routes and reduced chances of recolonization after fire; and 3) frequent human-caused fires in fragmented areas may facilitate the movement of edge effects into natural systems, impacting native biota. Each of these effects is exacerbated with the occurrence of large, intense fires and by the increased fire frequency. Although there is virtually no quantitative data on the interactive effects of habitat fragmentation and wildfire on wildlife populations, wildfire suppression is interpreted as generally beneficial to impacts associated with habitat fragmentation to the degree that it limits the amount of area burned due to the increased wildfire frequency.

Operational effects may add to habitat fragmentation. The act of constructing fire lines, helispots, staging areas, mopping-up and other ground disturbing processes may further subdivide the landscape. Subtle habitat fragments may be created by permanent type conversion of native vegetation or by changes that create conditions that are favorable to non-natives.

### Mechanical Fuel Reduction

Fuel modification is one of the causes of habitat degradation associated with urbanization that displaces wildlife, alters vegetation structure and composition, and facilitates establishment of non-native species.

A total of 90 acres on NPS property is treated with mechanical fuel reduction. These sites are located at the wildland urban interface, on the margins of park properties, where pre-existing development requires fuel modification on parkland to provide a defensible space around structures on adjoining private property or around park structures (Figure 2-1, Table 2-4). The vast majority of treated acreage is annual grassland that has been cleared for many years and which retains little or no native vegetation.

Several park properties were recently treated under the NPS WUI funding program where the local fire department and homeowners have been concerned with park vegetation. These areas have been treated in high quality coastal sage, chaparral, and oak woodland habitats. To minimize habitat fragmentation, only those areas that fall within 200' of residential structures will

continue to be maintained as a fuel modification zone; areas within the park core will be allowed to recover.

### Ecological Prescribed Fire

Ecological prescribed fire is planned only in annual grassland and oak savanna vegetation types. A maximum of 275 acres/project with a maximum of 4 projects/year is proposed. Because of the low intensity fires that occur in these vegetation types, the size of the fires, and the rapid vegetation recovery, no habitat fragmentation impacts are anticipated.

### Strategic Fuel Reduction

It is not possible to evaluate the habitat fragmentation impacts of the strategic fuels reduction alternative without a geographically specific project proposal. The analytical procedure required to evaluate the potential risk:benefit ratio has been outlined in the discussion of fire hazard assessment (Figure 3-17).

A maximum of 2 projects/year with 150 acres/project is proposed based on what is realistically achievable for park staff and NPS partners. Because specific strategic fuel reduction sites have not been identified, each project will require an individual environmental review.

### Education and Community Support

See A1a Vegetation, page 4-7.

## *Summary by Alternatives*

### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Wildfire suppression has a beneficial impact on the interaction between habitat fragmentation and wildfire impacts because it reduces fire size and the amount of area repeatedly burned in the high fire frequency environment of the Santa Monica Mountains; it is a long-term effect that permanently affects habitat characteristics; it has a moderate impact in that it is effective for small to moderate fires, but may not be effective in preventing the largest fires. Operational impacts of wildfire suppression are adverse due to habitat fragmentation caused by ground disturbance and vegetation destruction. Operational impacts are short-term or long-term depending on the vegetation type, operational methods, and post-fire rehabilitation treatment; operational impacts on habitat fragmentation may be of moderate intensity because effects are readily apparent, but limited in extent.

Fuel modification impacts are common to all alternatives. Habitat fragmentation impacts from fuel modification are adverse, long-term, and of moderate intensity. However the majority of the impacts for the project areas covered by this *Draft SMMNRA Fire Management Plan* have occurred from past maintenance activity and are identical among all alternatives, including the no-action alternative. No new fuel modification on parkland is anticipated from new development.

Education and community outreach benefits are identical among all alternatives including the no-action alternative.

### Alternative 1 – No-Action Alternative

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential to contribute to the adverse interaction between habitat fragmentation and wildfire. Habitat fragmentation impacts from landscape mosaic burning are considered to be adverse, long-term, and of moderate intensity. Increasing the amount of area burned in prescribed fires, as proposed under this alternative, increases the area and distribution of burned acreage across the landscape. This increases the probability of habitat fragmentation impacts by direct fire effects and by increasing the amount of habitat that is at ecological risk of degradation from subsequent wildfires with too short a fire return interval.

### Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

The impacts from strategic fuels reduction to habitat fragmentation are unknown and will need to be evaluated with project specific environmental analysis. Strategic fuels reduction would have a positive benefit on habitat fragmentation impacts if the technique were successful in limiting the amount of area burned, thereby increasing the fire rotation interval through more effective control of fire spread. Adverse impacts of habitat fragmentation would be expected if the projects were located in core habitat areas and vegetation were treated by either mechanical clearing or a high frequency prescribed fire return interval.

### Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

Ecological prescribed fire impacts on habitat connectivity are considered to be neutral, short-term and negligible due to mortality in a small number of species and beneficial, long-term, moderate due to improved habitat quality.

### Alternative 4 – Mechanical Fuel Reduction

Impacts to habitat connectivity from mechanical fuel reduction on NPS property are considered to be negligible because it is an ongoing activity with no increase in the amount of affected area over the No-Action Alternative (Alternative 1). Impacts are identical among all alternatives.

### Conclusions

Alternative 2 is the environmentally superior alternative because it avoids the adverse impacts of the No-Action Alternative (Alternative 1), includes the benefits of Alternative 3 and the common impacts of Alternative 4. It includes strategic fuel modification as a fire management technique which has both potential benefits and adverse impacts that will need to be evaluated with a project-specific EA.

## *Mitigation Measures*

- 1) The NPS and other agencies should work together to identify and protect large, continuous blocks of natural habitat to reduce impacts of habitat fragmentation.
- 2) Fire prevention and suppression techniques should be utilized to reduce the probability of large-scale, catastrophic wildfires in natural areas.
- 3) Additional research and monitoring should be undertaken to further understand the relationship between fire and habitat fragmentation. Top priority research needs include:
  - Effects of fire on wildlife under different fire sizes, shapes and intensities, including wildfire and prescribed fire.
  - Influence of surrounding human-modified landscapes on postfire wildlife recovery patterns.
  - Role and significance of fire as a potential extinction mechanism and edge effect facilitator in fragmented habitats.

## **IV Impact Topics**

### **A1d Biological Resources – Non-Native/Invasive Species**

#### *Threshold Criteria*

The impacts of invasive exotic species are analyzed by changes in the structure and composition of the vegetation in the dominant plant community types. Adverse impacts from invasive exotic species are those where non-native species alter the structure and composition of native plant communities and beneficial impacts are those where non-native species are eliminated.

#### Type of Impact

- Adverse: Non-native species abundance and diversity increases; native species diversity decreases; native community composition, structure, and processes are altered to less complex and/or non-sustainable condition.
- Beneficial: Non-native species abundance and diversity decreases; native species diversity increases; native community composition, structure and processes are restored or retained.

#### Duration of Impact

- Short-term: Transitory, 2-5 years.
- Long-term: Irreversible, 50-100+ years.

## Intensity of Impact

- Negligible: Imperceptible or undetectable effects upon vegetation.
- Minor: Slightly perceptible and localized effects.
- Moderate: Measurable change in plant community structure and composition; changes in ecosystem processes (e.g., fire, nutrient cycling, hydrology) on a localized level.
- Major: Substantial change in plant community structure and composition; changes in ecosystem processes (e.g., fire regime, nutrient cycling, hydrology) on a landscape scale.

## *Proposed Actions*

### Wildfire Suppression

Wildfire suppression occurs for all wildfires within the SMMNRA. Under the existing program of complete wildfire suppression, fires occur that range in size from 0.3 acres to 43,043 acres, with a median fire size of 76 acres. Despite the most intensive suppression efforts, large fires are an infrequent, but re-occurring event. The current anthropogenically dominated fire environment has drastically reduced the average fire return interval in the Santa Monica Mountains to 32 years.

Invasive plant species occur predominantly in plant communities subject to periodic natural disturbance such as stream channels, in areas in proximity to development (e.g., coastal bluffs, coastal terrace, valley bottoms), and in areas where native species cover and natural regeneration has been displaced, thereby providing an opening for non-native species invasions (e.g., grading, short fire return interval). There is no evidence that in the absence of a non-native propagule source, and with a fire return interval within the range of resiliency of the native plant communities, that fire promotes the establishment of non-native plant species. On the other hand, habitat type conversion of diverse chaparral shrubland to degraded annual grassland interspersed with resprouting laurel sumac from an unnaturally short fire return interval has been documented. Type conversion is believed to shift the fire regime towards more frequent and cooler fires that perpetuate the type-converted community. Wildfire may also act synergistically with other unnatural ecosystem perturbations to exacerbate the problem of non-native plant invasions (e.g., see habitat fragmentation discussion). Wildfire suppression is interpreted as generally beneficial to controlling non-native species to the degree that it limits the amount of area burned by wildfire in the Santa Monica Mountains and the degree to which it increases the average fire rotation interval.

Operational effects can facilitate the establishment of non-native invasive plant species by ground disturbing actions such as constructing fire lines and mopping-up. Additionally operational activities have the potential for spread of weed seed or propagules on equipment. Suppression operations create conditions that are favorable to non-natives which may invade these disturbed areas and displace native species. Depending on the proximity of non-native seed sources, the vegetation type and the operational methods used, the effects may be short lived if there is effective vegetative or seed regeneration of native species. Effects may be long term if the impacts are sufficient to create type converted, permanently degraded habitat types.

Although the use of heavy equipment for fire suppression is prohibited unless authorized by the SMMNRA superintendent, it is a standard tool for agencies charged with fire management on adjacent lands, and would almost certainly be employed in cases where life or property is at risk.

### Mechanical Fuel Reduction

A total of 90 acres on NPS property is treated with mechanical fuel reduction. These sites are located on the margins of park properties, where pre-existing development requires fuel modification on parkland to provide a defensible space around structures on adjoining private property or around park structures (Figure 2-1, Table 2-4). The vast majority of treated acreage is annual grassland that has been cleared for many years and which retains little or no native vegetation. A number of the sites have non-native perennial weed species that have the potential to spread beyond the fuel modification zone into the adjoining native plant communities (e.g., castor bean, fennel, and tree tobacco). Measures to control these species should be incorporated in the annual fuel modification work plan.

Several park properties were recently treated under the NPS WUI funding program where the local fire department and homeowners have been concerned with park vegetation. These areas have been treated in high quality coastal sage, chaparral, and oak woodland habitats. Fuel modification alters normal vegetation structure and makes the vegetation more susceptible to invasion by non-native annual grasses and forbs. To minimize the spread and permanent establishment of non-native plant species in high quality habitat areas, only those areas that fall within 200' of residential structures will continue to be maintained as a fuel modification zone. The NPS policy on fuel modification will follow that established by the California Department of Parks and Recreation (Appendix A).

### Ecological Prescribed Fire

Although prescribed fire is unnecessary for ecological health at the landscape level in the shrubland vegetation types in the Santa Monica Mountains, fire may be an effective tool to control invasive non-native species or to shift the competitive balance in favor of native over non-native species in disturbed or grassland areas. Ecological prescribed fire is being used in Cheeseboro Canyon to reduce the non-native seed bank as part of a native grassland and coastal sage scrub restoration project.

A maximum of 275 acres/project with a maximum of 4 projects/year is proposed for ecological prescribed fire. Areas that are potential restoration sites have been identified by overlaying annual grassland and oak savanna vegetation types onto park properties (Figure 2-2, Table 2-3).

### Strategic Fuel Reduction

It is not possible to evaluate the impacts of the strategic fuels reduction alternative on the spread and establishment of invasive plant species without a geographically specific project proposal. The analytical procedure required to evaluate the potential risk:benefit ratio has been outlined in the discussion of fire hazard assessment (Figure 3-17).

A maximum of 2 projects/year with 150 acres/project is proposed based on what is realistically achievable for park staff and NPS partners. Because specific strategic fuel reduction sites have not been identified, each project will require an individual environmental review.

### Education and Community Support

Education provides positive benefits in limiting the impacts of non-native invasive species in the SMMNRA where it is an important element of landscaping and fuel modification education programs.

### *Summary by Alternatives*

#### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Wildfire suppression has a beneficial impact on the spread and establishment of non-native plant species because it reduces the amount of area repeatedly burned in the high fire frequency environment of the Santa Monica Mountains; it is a long-term effect that permanently affects the trajectory of vegetation succession; it has a moderate impact in that it is effective for small to moderate fires, but may not be effective in preventing the largest fires. Operational impacts of wildfire suppression are adverse due to ground disturbance, native vegetation destruction, and the potential spread of weed propagules; effects may be short-term or long-term depending on the vegetation type, operational methods, and post-fire rehabilitation treatment; operational impacts may be of negligible to moderate intensity because effects can vary from none to measurable and localized, and occur across the landscape with repeated fires.

Impacts from establishment of non-native species due to fuel modification are adverse, long-term, and of moderate intensity. However the majority of the impacts for the project areas covered by this *Draft SMMNRA Fire Management Plan* have occurred from past maintenance activity and are identical among all alternatives, including the No-Action Alternative (Alternative 1). No new fuel modification on parkland is anticipated from new development.

Education and community outreach benefits are identical among all alternatives including the No-Action Alternative (Alternative 1).

#### Alternative 1 – No-Action Alternative

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential to create adverse impacts from non-native species establishment. Potential non-native species impacts from landscape mosaic burning are considered to be moderate, adverse, and long-term due to potential type conversion from a too-short fire return interval. Increasing the amount of area burned in prescribed fires, as proposed under this alternative, increases the amount of area that is at ecological risk from subsequent wildfires with too short a return interval.

## Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

The impacts on non-native species from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis. Benefits would occur on a landscape level if the technique were successful in limiting the amount of area burned, thereby increasing the fire rotation interval with more effective control of fire spread. Adverse impacts to the areas of treated vegetation would be expected from either mechanical clearing or a high frequency prescribed fire return interval.

## Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

Ecological prescribed fire has the potential to reduce impacts from non-native species and is therefore considered to have beneficial, long-term, moderate impacts.

## Alternative 4 – Mechanical Fuel Reduction

Non-native species impacts from mechanical fuel reduction are considered to be negligible because it is an ongoing activity with no increase in the amount of affected area over the no-action alternative. Impacts are identical among all alternatives.

## Conclusions

Alternative 2 is the environmentally superior alternative because it avoids the adverse impacts of the No-Action Alternative (Alternative 1), includes the benefits of Alternative 3 and the common impacts of Alternative 4. It includes strategic fuel modification as a fire management technique which has both potential benefits and adverse impacts that will need to be evaluated with a project-specific EA.

## *Mitigation Measures*

### Wildfire Suppression - Operational Impacts

- 1) Existing roads, fuel breaks and trails should be used for fire lines; new line construction should be limited to the greatest extent feasible.

### Fuel Modification

- 1) All park fuel modification zones should be monitored for the presence of serious invasive plant species. Species known to be aggressive invaders of wildland areas, particularly perennial herbs and shrubs, should be controlled as part of all mechanical fuel treatments. Where topography permits, annual grasslands should be mowed rather than disked.
- 2) Adopt State Park's policy for fuel modification on park properties where it is determined to be necessary to provide protection to private property as a joint agency policy (Appendix A).

## Education and Outreach

- 1) The NPS and other agencies should to continue to co-operate and improve outreach methods to inform residents about appropriate fuel modification techniques to preserve native species; the use of appropriate native landscaping; the importance of avoiding invasive non-natives species.
- 2) The NPS and other agencies should to continue to co-operate in all activities that promote fire prevention in order to reduce fire frequency. Road clearing projects should be evaluated for effectiveness and avoid increasing the area occupied by non-native species.

## IV Impact Topics

### A1e Biological Resources – Rare, Threatened and Endangered Species – Plants

#### *Threshold Criteria*

Fire may be a necessary element in the management of some special-status plant species by maintaining open habitat, stimulating reproduction, and affecting competing species. Fire may injure or kill individual plants while the effects on the species as a whole are beneficial because competition has been reduced or openings created. Fire suppression activities can adversely affect special-status species because of ground disturbance, habitat destruction, and plant mortality. Prescribed fires may be detrimental to non-fire adapted species or when the timing, frequency, and intensity of fire are outside of the natural fire cycle to which species are adapted (Hessl and Spackman, 1995).

The majority of plants listed as rare, threatened or endangered in the Santa Monica Mountains are not expected to be adversely impacted by wildfire because they either grow in habitats where fire has limited impact (e.g., rock outcrops, dunes, salt marshes) or they grow in fire adapted habitats and have been subjected to recurring natural fires.

#### Type of Impact

- Adverse: Viability of known populations and/or potential habitats of special-status species is threatened. May lead to loss of habitat, increased competition by either native or non-native species, cause plant mortality, or reduce and/or prevent reproduction.
- Beneficial: Enhances the viability of populations. May improve habitat conditions, eliminate competitive species (thereby increasing available habitat), or improve reproductive output and success.

#### Duration of Impact

- Short-term: May immediately affect the population or species, but with no long-term effects to population trends or species viability.

Long-term: May lead to a change in population or species viability — exhibited by a trend towards decline or increase in overall abundance, viability, and/or survival.

### Intensity of Impact

Negligible: Imperceptible or undetectable.

Minor: Slightly perceptible and localized, without the potential to affect long-term population viability.

Moderate: Apparent and sufficient to cause a change in abundance, distribution, quantity, or quality of individuals within a population, but effect is short-term; if multiple populations affected, then overall species viability is unaffected.

Major: Substantial and highly noticeable; effect is long-term; affects multiple populations.

### *Proposed Actions*

The majority of sensitive plant species in the Santa Monica Mountains do not occur on NPS land and are therefore not under direct management control by the NPS. In major wildfire events, suppression operations are not under the control of the NPS, but rest with Los Angeles or Ventura County Fire Departments. There is therefore limited potential for direct impact to sensitive plant species from any NPS fire management actions proposed under the alternatives. The NPS does maintain a sensitive species database as part of its role to provide support to other resource agencies and local jurisdictions in the protection of natural resources within the SMMNRA. The NPS therefore performs a predominately advisory role to other agencies whose actions have a greater potential to directly impact sensitive plant populations.

### Wildfire Suppression

Wildfire suppression occurs for all wildfires within the SMMNRA. Despite the most intensive suppression efforts, large fires are an infrequent, but re-occurring event. The average fire return interval in the Santa Monica Mountains is 32 years, significantly lower than the 100+ interval that would be expected with infrequent natural lightning ignitions. The probability is therefore high that populations of sensitive species will eventually be subjected to wildfire. The majority of plants listed as rare, threatened or endangered in the Santa Monica Mountains are not expected to be adversely impacted by wildfire because they either grow in habitats where fire has limited impact (e.g., rock outcrops, dunes, salt marshes) or they grow in fire-adapted habitats and have been subjected to recurring natural fires. There is no information to determine whether sensitive plant populations have been affected by altered fire regime parameters (frequency, intensity, season, etc.). In general, there is a lack of basic biological data on species response to fire for the sensitive species in the SMMNRA. A priority of the *Fire Management Plan* is to incorporate fire response data into the sensitive species database of the I & M program.

Operational effects associated with wildfire suppression have the potential to significantly impact populations of sensitive plant species. Actions such as constructing fire lines, helispots, staging areas, mop-up and other ground disturbing processes can impact sensitive species by

killing mature plants, by reducing post-fire reproduction through destruction/disturbance of the seed bed, or by destruction/disturbance of underground reproductive structures (e.g., burls, bulbs, rhizomes). Suppression operations also create conditions that are favorable to non-natives which may invade fire lines and compete with sensitive species. Whenever possible, operational impacts should be avoided by informing the incident commander where populations of sensitive plant species occur.

### **Mechanical Fuel Reduction**

A total of 90 acres on NPS property is treated with mechanical fuel reduction. These sites are located at the wildland urban interface where pre-existing development requires fuel modification on parkland to provide a defensible space around structures on adjoining private property or around park structures (Figure 2-1, Table 2-4). These areas have been treated for many years. Based on habitat characteristics and past land use, no sensitive plant populations are believed to grow in the existing fuel modification zones. A survey of all fuel modification areas to confirm the absence of sensitive species is recommended.

### **Ecological Prescribed Fire**

Ecological prescribed fire is proposed only in areas of annual grasslands or oak savanna that are depauperate of native species and are dominated by non-natives. No sensitive plant populations grow in the proposed restoration areas and there will be no impacts to sensitive plants from ecological prescribed fire.

### **Strategic Fuel Reduction**

It is not possible to evaluate the sensitive species impacts of the strategic fuels reduction alternative without a geographically specific project proposal. The analytical procedure required to evaluate the potential risk: benefit ratio has been outlined in the discussion of fire hazard assessment (Figure 3-17). Because specific strategic fuel reduction sites have not been identified, each project will require an individual environmental review that would assess the potential for sensitive species impacts.

### **Education and Community Support**

No community education programs related to sensitive species are proposed.

## ***Summary by Alternatives***

### **Impacts Common to All Alternative**

Wildfire suppression impacts are common to all alternatives. Wildfire is not expected to adversely impact most sensitive plant species, but there is limited data available on species response to fire. Effects potentially associated with changes in fire regime caused by increased anthropogenic ignitions and the counterbalancing influence of fire suppression are unknown due

to lack of data. Wildfire suppression operational effects on sensitive plant species are moderate, adverse, and potentially long-term. Whenever possible, operational impacts should be avoided by informing the incident commander of the location of populations of sensitive plant species.

Fuel modification impacts are common to all alternatives. There are no impacts to sensitive plant species expected from mechanical fuel reduction because no populations are believed to be located within the park's fuel modification areas. No new fuel modification on parkland that might potentially impact sensitive species is anticipated from new development.

No education and community outreach measures related to sensitive species are proposed.

### **Alternative 1 – No-Action Alternative**

The landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential to adversely impact sensitive species because of the larger size of individual projects in chaparral and coastal sage habitats which creates a greater opportunity to include and potentially impact sensitive species habitat within the project area. Actual impacts to particular sensitive plant species from landscape mosaic burning are unknown and can not be analyzed because no geographically specific project sites are identified. The impacts to sensitive plant species from landscape mosaic prescribed burn projects would need to be evaluated with project specific environmental analysis.

### **Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction**

The impacts to sensitive plant species from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis.

### **Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction**

There are no sensitive plant populations located within areas proposed for ecological prescribed burning and there are therefore no impacts to sensitive plant species.

### **Alternative 4 – Mechanical Fuel Reduction**

There are no impacts to sensitive plant species expected from mechanical fuel reduction because no populations are believed to be located within the fuel modification areas. This will be confirmed by park botanists prior to the 2003 fuel modification.

### **Conclusions**

Alternatives 3 and 4 have no impacts on sensitive plant populations and are therefore superior to the No-Action Alternative (Alternative 1) which has some limited potential to impact sensitive plant species habitat. The impacts of alternative 2 are unknown relative to both the No-Action Alternative (Alternative 1) and Alternatives 3 and 4.

## *Mitigation Measures*

### Wildfire Suppression - Operational Impacts

#### 1) **Incident Command Consultation**

To avoid operational impacts to populations of sensitive plant species, it is necessary that sensitive plant populations be identified and avoided. The geographic location and individual vulnerabilities of sensitive species may not be available to the fire-fighting agencies managing the fire control operations. As with cultural resources information, the NPS should provide for biological consultation to the Incident Command System. At minimum, this should include a qualified biologist with the sensitive species GIS database who can make recommendations to minimize impacts to any sensitive species potentially affected by fire control operations.

### Fuel modification

- 1) All fuel modification areas should be surveyed by NPS botanists to confirm that no sensitive species are located in the fuel modification zone.

### Information Needs

#### 1) **Post-Fire Monitoring Program**

With the possible exception of prescribed fire to provide strategic fuels reduction, sensitive plant populations are unlikely to experience fire except as wildland fire. The park should be prepared to monitor any sensitive plant populations that experience wildfire in order to develop basic information on fire effects in these species.

#### 2) **Sensitive Species Database**

There is a lack of basic biological data for a number of the sensitive species in the SMMNRA. Basic information on species response to fire should be collected through literature review and field observation. Fire response information should be incorporated into the sensitive species database as part of the I & M program.

## **IV Impact Topics**

### **A1f Biological Resources – Rare, Threatened and Endangered Species – Animals**

#### *Threshold Criteria*

Like most wildlife in the Santa Monica Mountains, special-status species have adapted to natural fire regimes. Fire control activities may adversely affect special-status species through direct disturbance of animals and habitats. Even management actions designed to benefit habitat, such as prescribed fire, can have inadvertent adverse effects on special-status species.

The distribution of sensitive species was determined based on literature, field observations of park staff, and local resource specialists, and from the ongoing SMMNRA sensitive species surveys.

### Type of Impact

- Adverse: Likely to result in declines in the abundance or distribution of a special-status species. This could occur through direct disturbance or mortality, or through destruction or alteration of habitat.
- Beneficial: Likely to protect and/or restore the natural abundance and distribution of a special-status species through protection and restoration of structure, succession, and distribution of habitat.

### Duration of Impact

- Short-term: Immediate changes in the abundance and distribution of a special-status species, but a return to the original condition occurs within two generations of that species.
- Long-term: Changes in the abundance and distribution of a special-status species that persist for greater than two generations of that species; continuance of population trend is likely to persist.

### Intensity of Impact

- Negligible: Imperceptible or undetectable.
- Minor: Slightly perceptible and limited in extent. Without further actions, effects would reverse, and the species affected would return to their previous conditions.
- Moderate: Readily apparent but limited in extent. Without further actions, effects would eventually reverse, and the species affected would return to their previous conditions.
- Major: Substantial, highly noticeable, and affecting a large area. Changes would not reverse without active management.

## *Proposed Actions*

### Wildfire Suppression

Wildfire suppression occurs for all wildfires within the SMMNRA. Despite the most intensive suppression efforts, large fires are an infrequent, but re-occurring event. The fire return interval in the Santa Monica Mountains is 32 years, significantly lower than the 100+ interval that would be expected with infrequent natural lightning ignitions. The probability is therefore high that sensitive wildlife species will eventually be subjected to wildfire.

To the extent that data are available, detailed information on the response of individual sensitive species to fire is provided in A5b Rare, Threatened, and Endangered Species – Wildlife, page 3-80.

### ***Mammals***

The majority of the park's sensitive mammal species, i.e. the salt marsh ornate shrew and all sensitive bat species, will not be directly impacted by wildfire mortality or habitat loss as their habitats are not susceptible to wildfire. Bats might be indirectly impacted by smoke and changes in food sources but there are no data available. Badgers would be minimally impacted as they would survive wildfire unless caught out of their dens at the time of the fire and their food source remains available after fires.

### ***Birds***

Birds that are unlikely to be affected by wildfire are aquatic species, locally extinct or extirpated species, migrants or vagrants, and rare winter residents. Year-round resident birds that would be mostly unaffected directly by wildfire are the osprey, peregrine falcon, and northern harrier, although fire might impact the food resources of the northern harrier and the peregrine falcon. Local breeding birds that are unaffected by wildfire due to their habitat preferences are Belding's savannah sparrow (salt marsh) and the golden eagle (cliffs, large range). Burrowing owls' underground nests in grasslands are also likely to be protected from the direct effects of wildfire

The following sensitive species nest in habitats that experience severe wildfire and are likely to be impacted by loss of habitat and alterations in food resource availability: mountain quail (dense chaparral); California horned lark (grasslands and open coastal sage scrub); loggerhead shrike (open woodlands, meadows and scrub savanna, clearings); San Diego cactus wren (cactus scrub); southern California rufous-crowned sparrow (sparse, open shrubland, and chaparral); yellow warbler (dense riparian scrub); long-eared owl, Cooper's hawk (oak woodland and riparian woodland). Detailed data on post-fire population impacts are available only for the cactus wren. For the majority of species it is assumed that wildfire impacts are adverse, but the duration and magnitude of the effects are unknown.

### ***Reptiles and amphibians***

The coast patchnose snake occurs in rocky outcrops and would therefore be expected to be unaffected by direct wildfire impacts.

Wildfires in riparian areas and the surrounding upland habitat, could adversely affect the following species by loss of riparian vegetation, increased stream temperatures or siltation effects: southwestern pond turtle, California newt, two-striped garter snake, and red-legged frog (Simi Hills). Data on specific impacts are available only for the California newt. Wildfire does not affect the abundance of mature newts, but siltation of breeding habitat causes a significant decline in reproductive success. Loss of ground cover in riparian and oak woodlands may adversely impact the San Diego mountain king snake and silvery legless lizard.

Sensitive reptile species that occur in scrub habitats may prefer the more open habitat created by fire including the San Diego horned lizard (sandy soils), coastal western whiptail, and San Bernadino ringneck snake.

For the majority of sensitive reptile and amphibian species, there are inadequate data to determine the type, duration, and magnitude of wildfire impacts.

### ***Fish***

Wildfire can adversely impact steelhead trout through indirect effects including loss of riparian stream cover, increased stream temperatures, and siltation of spawning habitat. The watersheds in which wildfire could impact steelhead are the Malibu, Topanga, and Arroyo Sequit watersheds. The tidewater goby, in the Malibu and Topanga lagoons, can also be adversely impacted by indirect sedimentation impacts to spawning habitat.

### ***Invertebrates***

No data on invertebrate responses to wildfire are available.

Because of the high fire frequency in the mountains and the presence of some sensitive species that are at least somewhat adversely impacted by wildfire, fire suppression is interpreted to be generally beneficial to sensitive wildlife species.

Operational effects associated with wildfire suppression have the potential to significantly impact sensitive species habitat. Actions such as constructing fire lines, helispots, staging areas, mop-up, and other ground disturbing processes can destroy habitat elements required by sensitive species. Whenever possible, operational impacts should be avoided by informing the incident commander where important sensitive wildlife habitat occurs.

In major wildfire events, suppression operations are not under the control of the NPS, but rest with Los Angeles or Ventura County Fire Departments. The NPS would perform a predominately advisory role to other agencies whose actions have a greater potential to directly impact sensitive wildlife species.

### **Mechanical Fuel Reduction**

A total of 90 acres on NPS property is treated with mechanical fuel reduction. These sites are located at the wildland urban interface where pre-existing development requires fuel modification on parkland to provide a defensible space around structures on adjoining private property or around park structures (Figure 2-1, Table 2-4). These areas have been treated for many years. Based on habitat characteristics and past land use no sensitive wildlife species are believed to use the existing fuel modification zones. A survey of all fuel modification areas to confirm the absence of sensitive species is recommended.

### **Ecological Prescribed Fire**

Ecological prescribed fire is proposed only in areas of annual grasslands or oak savanna that are depauperate of native plant species and are dominated by non-native grasses and forbs. No resident sensitive species that could be directly impacted by prescribed fire are expected to occur in the restoration areas, however all sites would be surveyed for potential sensitive species (e.g. badger, burrowing owl, California horned lark, and loggerhead shrike). Sensitive species that could potentially use the restoration sites for foraging (e.g., northern harrier, burrowing owl) would be minimally impacted because only a small percentage of the total grassland foraging habitat would be burned at one time. Because of the vegetation type, fire intensity, and topography

in the proposed ecological restoration areas, no erosion and subsequent sedimentation would be expected to enter stream systems that could impact sensitive aquatic or riparian species.

### Strategic Fuel Reduction

It is not possible to evaluate the sensitive species impacts of the strategic fuels reduction alternative without a geographically specific project proposal. The analytical procedure required to evaluate the potential risk: benefit ratio has been outlined in the discussion of fire hazard assessment (Figure 3-17). Because specific strategic fuel reduction sites have not been identified, each project will require an individual environmental review that would assess the potential for sensitive species impacts.

### Education and Community Support

No community education programs related to sensitive species are proposed.

### *Summary by Alternatives*

#### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Wildfire may adversely impact some sensitive wildlife species, but there are limited data available on species' response to fire. Effects potentially associated with changes in fire regime caused by increased anthropogenic ignitions and the counterbalancing influence of fire suppression are unknown due to lack of data. Operational effects from wildfire suppression activities are moderate, adverse, and potentially long-term. Whenever possible, operational impacts should be avoided by informing the incident commander of the location of sensitive species habitat.

Fuel modification impacts are common to all alternatives. There are no impacts to sensitive wildlife species expected from mechanical fuel reduction because no populations are believed to be located within the fuel modification areas. No new fuel modification on parkland that might potentially impact sensitive species is anticipated from new development.

No education and community outreach measures related to sensitive species are proposed.

#### Alternative I – No-Action Alternative

The landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential to impact sensitive species because of the larger size of individual projects in chaparral and coastal sage habitats. Actual impacts to particular sensitive wildlife species from landscape mosaic burning are unknown and can not be analyzed because no geographically specific project sites are identified. The impacts to sensitive wildlife species from landscape mosaic prescribed burn projects would need to be evaluated with project specific environmental analysis.

## Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

The impacts to sensitive wildlife species from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis.

## Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

No sensitive resident species are expected within areas proposed for ecological prescribed burning. Sites will be surveyed to ensure that there are no impacts to sensitive wildlife species.

## Alternative 4 – Mechanical Fuel Reduction

There are no impacts to sensitive wildlife expected from mechanical fuel reduction because no populations are believed to be located within the fuel modification areas.

## Conclusions

Alternatives 3 and 4 have no impacts on sensitive wildlife and are therefore superior to the No-Action Alternative (Alternative 1) which has some limited potential to impact sensitive species habitat. The impacts of Alternative 2 are unknown relative to both the No-Action Alternative (Alternative 1) and Alternatives 3 and 4.

## *Mitigation Measures*

### Wildfire Suppression - Operational Impacts

#### 1) **Incident Command Consultation**

To avoid operational impacts to sensitive wildlife species, it is necessary that sensitive wildlife habitat features and locations be identified and avoided. The geographic location and individual vulnerabilities of sensitive species may not be available to the firefighting agencies managing the fire control operations. As with cultural resources information, the NPS should provide for biological consultation to the Incident Command System. At minimum, this should include a qualified biologist with the sensitive species GIS database who can make recommendations to minimize impacts to any sensitive species potentially affected by fire control operations.

- 2) Sensitive habitats that could be impacted by operational activities should be identified by NPS on a GIS database and made available at the Incident Command Post. Fire operations should avoid sensitive habitat areas, especially streams and woodlands.
- 3) Trees should be preserved during line construction and other operations requiring vegetation clearance.

## Ecological Prescribed Fire

- 1) Survey all areas for the presence of resident sensitive wildlife species.

## Information Needs

### 1) **Post-Fire Monitoring Program**

With the possible exception of prescribed fire to provide strategic fuels reduction, sensitive wildlife populations are unlikely to experience fire except as wildland fire. The park should be prepared to monitor any sensitive wildlife populations that experience wildfire in order to develop basic information on fire effects in these species.

### 2) **Sensitive Species Database**

There is a lack of basic biological data for a number of the sensitive species in the SMMNRA. Basic information on species response to fire should be collected through literature review and field observation. Fire response information should be incorporated into the sensitive species database as part of the I & M program.

## IV Impact Topics

### A2 Soils and Geology

#### *Threshold Criteria*

Water resources and soils are interrelated in their reactions to fire. Effects upon soils and water quality are assessed by considering the likely scale of the effect — whether fire would affect all or part of the watershed slope (ridge, mid-slope, bottom) — and as a result, the likely effect upon water yield, peak flows, sediment yield, nutrient yield, and/or stream system response. Soils and water quality effects are driven by the magnitude of storm events following fire and the time to restore normal vegetative cover. These effects are highly stochastic due to the enormous annual variation in rainfall amount and intensity. The frequency of events will also be a significant factor.

#### Type of Impact

- Adverse: Effects outside the natural range of variability for watershed conditions (water yield, peak flows, sediment yield, nutrient yield, or stream system response, frequency of occurrence).
- Beneficial: Effects within the natural range of variability for watershed conditions (water yield, peak flows, sediment yield, nutrient yield, or stream system response, frequency of occurrence).

#### Duration of Impact

- Short-term: Transitory; < 5 years; < one El Nino cycle.
- Long-term: Irreversible; 50+ years; > one El Nino cycle.

## Intensity of Impact

Negligible:	Imperceptible or undetectable.
Minor:	Slightly perceptible and localized, effects do not move beyond the affected area
Moderate:	Measurable effects can be detected beyond the affected area, but are transitory, reversible, and within the historic range of variability for the ecosystem.
Major:	Effects are substantial, highly noticeable, at the watershed scale; irreversible; or outside the range of historic ecosystem variability.

## *Proposed Actions*

### Wildfire Suppression

Wildfire suppression occurs for all wildfires within the Santa Monica Mountains National Recreation Area. Despite the most intensive suppression efforts, large fires are an infrequent, but re-occurring event. Fires occur that range in size from 0.3 acres to 43,043 acres, with a median fire size of 76 acres. The fire return interval is 32 years, significantly lower than the 100+ interval that would be expected with infrequent natural lightning ignitions. Large wildfires can impact several small watersheds and/or a large percentage of the larger watersheds in a single event. They dramatically affect soils and water quality, the magnitude of which are driven by the size of the fire, the magnitude of storm events following fire, and the time to restore normal vegetative cover. Wildfire suppression is therefore interpreted as beneficial in limiting the soils, geology, and watershed impacts associated with wildfires to the degree that it limits the amount of area burned with increased wildfire frequency.

Suppression is effective in limiting the size of fires under mild and moderate climactic conditions, but is less successful for fires that start in extreme weather conditions. More area may therefore burn under intense fire conditions which exacerbate soil and geology fire impacts. In the absence of controlling fire to reduce fire frequency starts (especially arson and power lines), there is little that can be done to reduce this impact.

Operational actions such as constructing fire lines, helispots, staging areas, mop-up, and other ground disturbing processes can expose soils and make them susceptible to erosion. Depending on the effectiveness of rehabilitation methods, and whether type conversion permanently degrades shrubland habitat types, these operations may create either short- or long-term soil impacts. The use of heavy equipment has the potential to be especially damaging. Although the use of heavy equipment for fire suppression is prohibited unless authorized by the SMMNRA superintendent, it is a standard tool for agencies charged with fire management on adjacent lands, and would almost certainly be employed in cases where life or property is at risk.

### Mechanical Fuel Reduction

Mechanical fuel reduction can create soil erosion impacts by exposing soils through vegetation removal and by increasing the potential for mass movement by removing deep rooted shrubs and

type converting to grasslands. The effects will depend on the amount of area treated, the slope angle, the soil type, the vegetation type and the amount of cover retained. On very steep slopes workers can dislodge significant amounts of surface soil as they move across the slopes cutting vegetation; these impacts are often repeated on an annual basis to meet fire department fuel modification requirements.

A total of 90 acres on NPS property is treated by mechanical fuel reduction. These sites are located at the wildland urban interface where pre-existing development requires fuel modification on parkland to provide a defensible space around structures on adjoining private property or around park structures (Figure 2-1, Table 2-4). The vast majority of treated acreage is annual grassland that has been cleared for many years. These areas are either mowed, turned over with a tractor-pulled disker, or on steep slopes, weed-whipped. The areas that are mowed have limited erosion potential because they are generally located on very gentle slopes and the annual grasses provide vegetation cover that limits surface erosion. Weed-whipped areas similarly have limited erosion potential because they have a cover of annual grasses, even though the slopes are steeper. The disked areas, in contrast, are potentially susceptible to erosion because soil is turned over and exposed.

Several park properties were recently treated under the NPS WUI funding program where the local fire department and homeowners have been concerned with park vegetation. These areas have been treated in high quality coastal sage, chaparral and oak woodland habitats. Mechanical fuel reduction in these areas removes dead material and flashy fuels, reduces the density of shrubs, and limbs up trees and large shrubs. Where fuel modification of shrublands or woodlands is repeated annually, grasses normally invade. If grasses are established and annually weed whipped, surface erosion is generally not a major problem. However, on some of the very steep slopes annual fuel modification may dislodge significant amounts of surface soil as workers move across the slopes. On very steep slopes where shrubs have been replaced by annual grasses the potential for shallow soil slips in intense rainfall events also increases. To minimize soil erosion and the potential for slope failure, only those areas that fall within 200' of residential structures will continue to be maintained as a fuel modification zone. The NPS policy on fuel modification will follow that established by the California Department of Parks and Recreation (Appendix A).

### Ecological Prescribed Fire

Ecological prescribed fire is proposed only in grassland areas with level or relatively gentle slopes. A maximum of 275 acres/project with a maximum of 4 projects/year is proposed for ecological prescribed fire. The prescribed burn areas represent only a tiny fraction of the total watershed area in which the prescribed burns are proposed. No erosion from areas of prescribed fire is anticipated because the burned stubble that remains after the low fire intensities of the grassland burns provides soil protection from erosion. The lack of steep slopes further limits the potential for erosion.

### Strategic Fuel Reduction

It is not possible to evaluate the soil or geologic impacts of the strategic fuels reduction alternative without a geographically specific project proposal. The analytical procedure required to evaluate the potential risk: benefit ratio has been outlined in the discussion of fire hazard assessment (Figure 3-17).

A maximum of 2 projects/year with 150 acres/project is proposed based on what is realistically achievable for park staff and NPS partners. Because specific strategic fuel reduction sites have not been identified, each project will require an individual environmental review.

### **Education and Community Support**

Education will have positive benefits in reducing erosion and the potential for shallow slope failures in the SMMNRA where it can be used to teach residents appropriate fire safe landscape management techniques. These include appropriate fuel modification techniques that preserve native species; use of appropriate native landscaping; avoidance of non-native plant that increase fuel load; limited use of irrigation; slope preservation; and appropriate structure siting to limit the fuel modification zone.

### ***Summary by Alternatives***

#### **Impacts Common to All Alternative**

Wildfire suppression impacts are common to all alternatives. Wildfire suppression has a beneficial impact to soils and geology because it reduces the amount of area exposed to erosion from wildfires; it is a short-term effect; it has a moderate impact in that it is effective for small to moderate fires, but may not be effective in preventing the largest fires. Operational impacts of wildfire suppression are adverse due to ground disturbance and vegetation destruction; they may be short-term or long-term depending on the vegetation type, operational methods, and post-fire rehabilitation treatment; operational impacts are of minor intensity because the effects are mostly localized.

Fuel modification impacts are also common to all alternatives. Impacts to soils and geology from fuel modification are adverse, long-term, and of minor to moderate intensity. However the majority of the impacts for the project areas covered by this *Draft SMMNRA Fire Management Plan* have occurred from past maintenance activity and are identical among all alternatives including the No-Action Alternative (Alternative 1). No new fuel modification on parkland is anticipated from new development.

Education and community outreach benefits are beneficial, long-term, of minor to moderate intensity and are identical among all alternatives including the No-Action Alternative (Alternative 1).

#### **Alternative 1 – No-Action Alternative**

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994

*Fire Management Plan* (existing program) has the greatest potential to directly impact soils and geology from erosion and indirectly, from soil impacts associated with type conversion. Potential impacts to soils from landscape mosaic burning are considered to be minor to moderate, adverse, and short-term.

### Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

The impacts to soils and geology from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis. Reduced soil erosion would occur on a landscape level if the technique were successful in limiting the amount of area burned. Adverse effects from erosion and mass movement are potential impacts in the areas of treated vegetation from either mechanical clearing or a high frequency prescribed fire return interval.

### Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

Impacts to soils from ecological prescribed fire are neutral, short-term and minor in grassland ecosystems.

### Alternative 4 – Mechanical Fuel Reduction

Impacts to soils from mechanical fuel reduction are adverse, short- to long-term, and minor to moderate, but are considered to be negligible because it is an ongoing activity with no increase in the amount of affected area over the No-Action Alternative (Alternative 1). Impacts are identical among all alternatives.

### Conclusions

Alternative 2 is the environmentally superior alternative because it avoids the adverse impacts of the No-Action Alternative (Alternative 1); it shares in common the neutral effects of Alternative 3 and the adverse impacts of Alternative 4; and it includes strategic fuel modification as a fire management technique which has both potential benefits and adverse impacts that will need to be evaluated with a project-specific EA.

### *Mitigation Measures*

#### Wildfire Suppression - Operational Impacts

- 1) Existing roads, fuel breaks and trails should be used for fire lines; new line construction should be limited to the greatest extent feasible.

#### Fuel Modification

- 1) Work with local jurisdictions to require structure siting to be setback from steep slopes and ridgetops to avoid shrub removal and annual fuel modification on steep slopes.

- 2) The NPS and other agencies should work together to identify the amount of fuel modification required to protect structures from radiative heat loss or from loss due to direct flame impingement. The NPS should analyze the potential cumulative habitat impacts from fuel modification that exceeds the amount necessary to protect structures (e.g. 100' vs. 200').

### Education and Outreach

- 1) The NPS and other agencies should to continue to co-operate and improve outreach methods to inform residents about appropriate fuel modification techniques to preserve native species; the use of appropriate native landscaping; the importance of limiting non-natives that increase fuel load; the importance of limiting irrigation; the importance of preserving slope vegetation; and appropriate structure siting to limit the size of the required fuel modification zone.

## IV Impact Topics

### A3 Water Resources and Wetlands

#### *Threshold Criteria*

A programmatic approach has been developed to minimize wetland impacts from NPS activities. The protection of wetlands is facilitated through Executive Order 11990, Protection of Wetlands; *NPS Director's Order 77-1*, Wetland Protection and its accompanying Procedural Manual 77-1 (DO 77-1 and PM 77-1); Clean Water Act, Section 404; and the "no net loss" goal outlined by the White House Office on Environmental Policy in 1993. Executive Order 11990 requires that leadership be provided by involved agencies to minimize the destruction, loss, or degradation of wetlands. *NPS Director's Order 77-1* and Procedural Manual 77-1 provide the procedural structure in which Executive Order 11990 may be implemented. Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act authorize the U.S. Army Corps of Engineers to grant permits for construction and disposal of dredged material in waters of the United States.

Potential wetlands are identified in the SMMNRA GIS database from the 1) vegetation map that identifies wetland and riparian vegetation types and 2) SMMNRA stream survey. It is assumed for purposes of analysis that all wetland and riparian communities on the vegetation map are likely to be classified as wetlands in future delineations of wetlands in the park. This information therefore provides a conservative and broad estimate of potential wetlands in the SMMNRA.

Impacts were assessed with two criteria in mind:

- Federal laws, regulations, and executive orders; similar state laws (for example, the California Endangered Species Act); or NPS management policies.
- Projected impacts on the natural history of a species or the known sensitivities of a habitat.

The assessment of fire management impacts also needs to occur within the context of wetland condition and natural disturbance processes. For this analysis, it was assumed that the greater the size of a wetland community and the stronger its links to neighboring communities, the more valuable it is to the integrity and maintenance of biotic processes.

### Type of Impact

- Adverse: Degrades the size, integrity, or connectivity of wetlands; disrupts normal biophysical wetland processes; degrades natives species diversity, structure and composition.
- Beneficial: No detrimental effects; enhances native biophysical wetland processes; enhances the size, integrity, or connectivity of wetlands; enhances natives species diversity, structure and composition.

### Duration of Impact

- Short-term: Transitory.
- Long-term: Irreversible.

### Intensity of Impact

Three primary measures were used to evaluate the intensity of impacts on wetlands: the size and type of the wetland, the integrity of the wetland, and the connectivity of the wetland to adjacent habitats.

- Negligible: Imperceptible or not detectable.
- Minor: Slightly detectable, localized within a small area, and would not affect the overall viability of wetlands in the park.
- Moderate: Measurable but could be reversed.
- Major: Substantial, highly noticeable, and could be permanent.

## *Proposed Actions*

### Wildfire Suppression

Wildfire suppression occurs for all wildfires within the SMMNRA. Despite the most intensive suppression efforts, large fires are an infrequent, but re-occurring event. Fires occur that range in size from 0.3 acres to 43,043 acres, with a median fire size of 76 acres. The average fire return interval is 32 years, significantly lower than the 100+ interval that would be expected with infrequent natural lightening ignitions. Large wildfires can impact several small watersheds and/or a large percentage of the larger watersheds in a single event. Wildfires affect water quality by increasing nutrients, sediments, and potentially temperatures, as well as altering stream morphology. In general, the greater the percentage of the watershed or drainage that is burned, the greater the impact on streams and wetlands. Wildfire suppression is therefore interpreted as beneficial in limiting wildfire impacts to water resources to the degree that suppression limits the amount of area burned.

Operational actions such as constructing fire lines, helispots, staging areas, mop-up, and other ground disturbing processes can affect water resources if they are located in proximity to streams or other wetlands. The use of heavy equipment has the potential to be especially damaging. Although the use of heavy equipment for fire suppression is prohibited unless authorized by the SMMNRA superintendent, it is a standard tool for agencies charged with fire management on adjacent lands, and would almost certainly be employed in cases where life or property is at risk.

### **Mechanical Fuel Reduction**

Mechanical fuel reduction can impact water resources if it is located in proximity to streams or wetlands by causing erosion or removal of riparian/wetland vegetation.

A total of 90 acres on NPS property is treated with mechanical fuel reduction. These sites are located at the wildland urban interface where pre-existing development requires fuel modification on parkland to provide a defensible space around structures on adjoining private property or around park structures (Figure 2-1, Table 2-4). None of these sites is located in proximity to streams or other wetlands.

### **Ecological Prescribed Fire**

Ecological prescribed fire is proposed only in grassland areas with level or relatively gentle slopes. A maximum of 275 acres/project with a maximum of 4 projects/year is proposed for ecological prescribed fire. The prescribed burn areas represent only a tiny fraction of the total watershed area in which the prescribed burns are proposed. No erosion from areas of prescribed fires is anticipated because the burned stubble that remains after the fire intensities of the grassland burns provides soil protection from erosion. The lack of steep slopes further limits the potential for erosion. Any potential nutrient impacts would be negligible and transitory.

### **Strategic Fuel Reduction**

It is not possible to evaluate the impacts of the strategic fuels reduction alternative on water resources or wetlands without a geographically specific project proposal. The analytical procedure required to evaluate the potential risk:benefit ratio has been outlined in the discussion of fire hazard assessment (Figure 3-17).

A maximum of 2 projects/year with 150 acres/project is proposed based on what is realistically achievable for park staff and NPS partners. Because specific strategic fuel reduction sites have not been identified, each project will require an individual environmental review.

### **Education and Community Support**

See A1a Vegetation, page 4-4; and A2 Soils and Geology, page 4-34.

## *Summary by Alternatives*

### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Wildfire suppression has a beneficial impact to water resources because it reduces the amount of area exposed to erosion and runoff from wildfires; it is a short-term effect; it has a moderate impact in that it is effective for small to moderate fires, but may not be effective in preventing the largest fires. Operational impacts of wildfire suppression if they are located in proximity to streams or other wetlands may be adverse due to erosion from ground disturbance, channel alteration or vegetation destruction; they may be short-term or long-term depending on the vegetation type, operational methods, and post-fire rehabilitation treatment; operational impacts are of minor or moderate intensity because the effects are mostly localized, but may be carried downstream.

Fuel modification impacts are also common to all alternatives. There are no impacts to water resources from ongoing fuel modification activities which are identical among all alternatives including the No-Action Alternative (Alternative 1). No new fuel modification on parkland that might impact water resources is anticipated from new development.

Education and community outreach benefits are beneficial, long-term, of minor to moderate intensity and are identical among all alternatives including the No-Action Alternative (Alternative 1).

### Alternative 1 – No-Action Alternative

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential to impact water resources by increasing nutrient and sediment runoff to streams and coastal wetlands. Potential impacts to water resources from landscape mosaic burning are considered to be minor to moderate, adverse, and short-term.

### Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

The impacts to water resources from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis. Improved water quality of water resources would occur on a landscape level if the technique were successful in limiting the amount of area burned. Adverse impacts from erosion due to loss of vegetative cover are potential impacts in the areas of treated vegetation from either mechanical clearing or a high frequency prescribed fire return interval.

### Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

Impacts to water resources from ecological prescribed fire are neutral, short-term and minor in grassland ecosystems.

## Alternative 4 – Mechanical Fuel Reduction

Impacts to water resources from mechanical fuel reduction are considered to be negligible because the work is not located in proximity to streams or wetlands and is an ongoing activity with no increase in the amount of affected area over the no-action alternative. Impacts are identical among all alternatives.

## Conclusions

Alternative 2 is the environmentally superior alternative because it avoids the adverse impacts of the No-Action Alternative (Alternative 1); it shares in common the neutral effects of Alternative 3 and the adverse impacts of Alternative 4; and it includes strategic fuel modification as a fire management technique which has both potential benefits and adverse impacts that will need to be evaluated with a project-specific EA.

## *Mitigation Measures*

### Wildfire Suppression - Operational Impacts

- 1) Sensitive riparian or other wetlands that could be impacted by operational activities should be identified by NPS on a GIS database and made available at the Incident Command Post. Fire operations should avoid stream and wetland areas.
- 2) Fire lines should be restored to natural grade and to conditions that will encourage native plant growth and avoid weed invasions.

### Fuel Modification

- 1) Fuel modification should be avoided in riparian areas and a 100' minimum buffer area provided.

## **IV Impact Topics**

### **A4 Coastal Resources**

Sedimentation from major storm events following fires has the potential to bury rocky marine substrate. Loss of rocky bottom habitat is considered to be a significant impact because it is a loss of regional biodiversity due to the less productive nature of sandy bottom habitat and the limited distribution of rocky bottom habitat (Ambrose et al., 1996). It has not been determined if the suspended sediments observed in the water column off the Malibu Coast is due to re-suspension of bottom sediments or to increased rates of terrestrial erosion. There are no data available to determine if sediment sources from the land are affecting the amount of rock substrate and if the pulse of sediments from post fire years with high rainfall is a contributing factor to the fluctuation in kelp bed distribution and population size.

Because there is inadequate information available to know whether fire sediments have an

impact on coastal resources, this impact topic is not analyzed with respect to individual alternatives. In general, the relative impact to coastal resources would be expected to parallel the conclusions of the water resources/wetlands analysis because the same processes affect the two resources.

## *Mitigation Measures*

### Information Needs

Additional research and monitoring should be undertaken to understand the relationship between fire-derived sediments and rocky habitat including:

- Are the suspended sediments observed in the water column off the Malibu Coast due to re-suspension of bottom sediments or to increased rates of terrestrial erosion?
- Is the pulse of sediments from post fire years with high rainfall is a contributing factor to the fluctuation in kelp bed distribution and population size?

## **IV Impact Topics**

### **A5 Paleontological Resources**

#### *Threshold Criteria*

#### Type of Impact

Adverse: Degrades or destroys paleontological resources.  
Beneficial: Preserves paleontological resources for the future.

#### Duration of Impact

Short-term: May temporarily affect fossil resources, but with no long-term effects.  
Long-term: Permanently affects fossil resources.

#### Intensity of Impact

Negligible: Imperceptible or undetectable.  
Minor: Affects a fraction of a local formation; limited effect on resources with low sensitivity.  
Moderate: Affects resources of particular scientific value; affects a substantial portion of a particular formation.  
Major: Affects the majority of an entire formation.

#### *Proposed Actions*

The NPS has recently completed a survey of paleontological resources within the SMMNRA. These resources occur on both parkland and private property. In major wildfire events, suppres-

sion operations are not under the control of the NPS, but rest with Los Angeles or Ventura County Fire Departments. The NPS therefore performs a predominately advisory role to other agencies whose actions have a greater potential to directly impact paleontological resources.

### Wildfire Suppression

The average fire return interval in the Santa Monica Mountains is 32 years, and the probability is therefore high that surface paleontological resource will eventually be subjected to wildfire. There is no information to evaluate the direct damage to paleontological resources from wildfire. It is presumed to be relatively limited as fossils would need to occur at the surface and to be covered with high fuel loads. Fossils may be lost or exposed as the result of postfire erosion which can be significant in heavy rainfall years following fires. Fossil may also be exposed to collectors or vandals when vegetative cover is lost.

Operational effects associated with wildfire suppression have the potential to significantly impact fossil resources, especially those operations that use heavy equipment for activities such as constructing fire lines, helispots, staging areas, mop-up, and other ground disturbing processes. Whenever possible, operational impacts should be avoided by informing the incident commander where sensitive paleontological resources occur.

### Mechanical Fuel Reduction

A total of 90 acres on NPS property is treated with mechanical fuel reduction. These sites are located at the wildland urban interface where pre-existing development requires fuel modification on parkland to provide a defensible space around structures on adjoining private property or around park structures (Figure 2-1, Table 2-4). No paleontological resources are known from these areas.

### Ecological Prescribed Fire

Ecological prescribed fire is proposed only in areas of annual grasslands or oak savanna. No surface paleontological resources that might be impacted by prescribed fire are known from the proposed restoration areas.

### Strategic Fuel Reduction

It is not possible to evaluate the impacts to paleontological resources from the strategic fuels reduction alternative without a geographically specific project proposal. The analytical procedure required to evaluate the potential risk: benefit ratio has been outlined in the discussion of fire hazard assessment (Figure 3-17). Because specific strategic fuel reduction sites have not been identified, each project will require an individual environmental review that would assess the potential for paleontological resources impacts.

### Education and Community Support

No community education programs related to paleontological resources are proposed.

## *Summary by Alternatives*

### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Wildfire may have a minor direct impact on paleontological resources from heat damage, but there are limited data available to evaluate this potential impact. Wildfire suppression operational impacts on paleontological resources are potentially minor to moderate, adverse, and long-term. Whenever possible, operational impacts should be avoided by informing the incident commander of the location of populations of sensitive paleontological resources.

Fuel modification impacts are common to all alternatives. There are no impacts to paleontological resources expected from mechanical fuel reduction. No new fuel modification on parkland that might potentially impact paleontological resources is anticipated from new development.

No education and community outreach measures related to paleontological resources are proposed.

### Alternative 1 – No-Action Alternative

The landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential to adversely impact paleontological resources because of the larger size of individual projects in chaparral and coastal sage habitats which creates a greater opportunity to include and potentially impact areas of paleontological resources within the project area. Actual impacts to particular paleontological sites from landscape mosaic burning are unknown and can not be analyzed because no geographically specific project sites are identified. The impacts to paleontological resources from landscape mosaic prescribed burn projects would need to be evaluated with project specific environmental analysis.

### Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

The impacts to paleontological resources from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis.

### Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

There are no surface paleontological resources located within areas proposed for ecological prescribed burning and there are therefore no impacts to paleontological resources anticipated from ecological prescribed burning.

### Alternative 4 – Mechanical Fuel Reduction

There are no impacts to paleontological resources expected from mechanical fuel reduction because no paleontological resources are located within the fuel modification areas.

## Conclusions

Alternatives 3 and 4 have no impacts on paleontological resources and are therefore superior to the No-Action Alternative (Alternative 1) which has some limited potential to adversely impact paleontological resources. The impacts of Alternative 2 are unknown relative to both the No-Action Alternative (Alternative 1) and Alternatives 3 and 4.

## *Mitigation Measures*

### Wildfire Suppression – Operational Impacts

#### 1) **Incident Command Consultation**

To avoid operational impacts to paleontological resources, it is necessary that paleontological resources be identified and avoided. The geographic location and individual vulnerabilities of paleontological resources may not be available to the firefighting agencies managing the fire control operations. As with cultural and biological resources information, the NPS should provide for paleontological resources consultation to the Incident Command System. At minimum, this should include a qualified GIS specialist with the paleontological resources GIS database who can make recommendations to minimize impacts to any paleontological resources potentially affected by fire control operations.

- 2) Areas with fossil resources that might be exposed and vandalized following wildfire should be closed to public access and monitored by enforcement personnel.

### Information Needs

#### 1) **Post-Fire Monitoring Program/ Paleontological Database**

Following fire, the park should be prepared to survey appropriate formations within burn areas and areas of erosion or slope failure for the presence of fossil deposits that were previously inaccessible.

## **IV Impact Topics**

### **A6 Air Quality**

#### *Threshold Criteria*

Fire management activities could potentially affect air quality in the Santa Monica Mountains National Recreation Area through smoke emissions from wildland and prescribed fires. Pollutants found in smoke emissions include suspended particulate matter (PM10), fine particulate matter (PM2.5), methane (CH4), carbon monoxide (CO), nitrogen oxides (NOx), and carbon dioxide (CO2).

Per Title 17 of the California Code of Regulations, Subchapter 2 Smoke Management Guidelines

for Agricultural and Prescribed Burning (2001), the Guidelines are to provide direction to air pollution control and air quality management districts (air districts) in the regulation and control of prescribed burning in California. The Guidelines are intended to provide for the continuation of prescribed burning, as a resource management tool and provide increased opportunities for prescribed burning, while minimizing smoke impacts on the public. The regulatory actions called for are intended to assure that each air district has a program that meets air district and regional needs.

The park must comply with the requirements of the South Coast Air Quality Management District for Los Angeles County and the Ventura County Air Pollution Control District for Ventura County before prescribed burn projects are ignited. Special requirements for prescribed burning in wildland fuels are described in the *Fire Management Plan* in the Fuels Management section.

Potential air pollutants associated with wildland and prescribed fire include particulate matter (PM10, suspended particulate and PM2.5, fine particulate matter), carbon monoxide (CO), carbon dioxides (CO2) nitrogen oxides (NOx), volatile organic compounds (VOC, total hydrocarbons). To evaluate smoke impacts associated with specific projects, emissions for PM-10 are calculated as a proxy for other air pollutants for the purposes of analyzing the relative air quality impacts of the different alternatives.

**Table 4-1 Particulate Matter Emissions**

***PM-10 Emissions Calculations for Piles***

1. Choose the pile size most representative of the piles on your burn site.
2. Multiply the number of piles in your project with the corresponding "Tons of PM10/Pile" value to get the total PM-10 tonnage.

PM10 EMISSIONS FOR SPECIFIED PILE SIZES		
Pile Size (in feet)	Pile Tonnage	Tons of PM10/Pile
4' diameter x 3' height	0.056	0.0005
5' diameter x 4' height	0.12	0.001
6' diameter x 5' height	0.21	0.002
8' diameter x 6' height	0.45	0.004
10' diameter x 6' height	0.71	0.007
12' diameter x 8' height	1.3	0.01
15' diameter x 8' height	2.1	0.02
20' diameter x 10' height	4.7	0.04
25' diameter x 10' height	7.4	0.07
50' diameter x 10' height	29	0.3

- Pile Tonnage calculated using paraboloid volume formulae multiplied by 30 lbs/cu.ft., multiplied by 0.2 packing ratio<sup>b</sup>
- U.S. Forest Service's Conformity Handbook, Table 6 – PM10 Emissions Factor of 19.0 pounds/ton of fuel burned – average pile and burn slash

Revised 2/13/2001

a. Formula used for Paraboloid Volume (cu.ft.) =  $3.1416 \times [\text{height} \times (\text{diameter})^2] / 8$  (see Reference b. below).

b. USDA (2/1996). Forest Service General Technical Report. Report Number: PNW-GTR

**Table 4-2 PM 10 Emission Calculation For Burning of Multiple Fuel Types 1, 2**

Section 80160 (b) of Subchapter 2 Smoke Management Guidelines for Agricultural and Prescribe Burning, Title 17, California Administrative Code states, “requires the submittal of smoke management plans for all burn projects greater than 10 acres in size or estimated to produce more than 1 ton of particulate matter”. To determine what the particulate matter (PM 10) amount is of your burn project please use the equation below and review the following examples.

<b>Information needed for PM 10 Calculations:</b>						
a.	VT = Vegetation type					
b.	ACRESVT = Estimated number of acres for VT					
c.	FL est. = Estimated fuel loading in VT TONS per ACRE					
d.	EV = PM10 emission/ton of fuel					
<b>Calculating PM10 Emissions from Prescribed Burning of multiple vegetation types:</b>						
PM10 ton(s) emissions per VT = (number of acres VT <sub>1</sub> ) (FL tons per acre) [Emission Value (EV)] = _____ lbs(s)/VT						
PM10 ton(s) emissions per VT = (number of acres VT <sub>2</sub> ) (FL tons per acre) [Emission Value (EV)] = _____ lbs(s)/VT						
<b>Sum Total is the Estimated PM 10 for the project = _____ lbs(s)/project</b>						
VEGETATION TYPE(S)	ACRES (VT)	×	FL est.	×	EVI	PM10 EMISSIONS (lbs)
Basing Sage/Low Sage	( _____ )	×	( _____ )	×	(0.010) =	_____
Ceanothus	( _____ )	×	( _____ )	×	(0.010) =	_____
Chamise	( _____ )	×	( _____ )	×	(0.009) =	_____
Grass/Forb	( _____ )	×	( _____ )	×	(0.007) =	_____
Hackberry Oak	( _____ )	×	( _____ )	×	(0.005) =	_____
Hardwood (Stocked)	( _____ )	×	( _____ )	×	(0.003) =	_____
Hardwood (Non-stocked)	( _____ )	×	( _____ )	×	(0.003) =	_____
Live Oak (Canyon)	( _____ )	×	( _____ )	×	(0.007) =	_____
Live Oak (Interior)	( _____ )	×	( _____ )	×	(0.007) =	_____
Mixed Chaparral/Montane	( _____ )	×	( _____ )	×	(0.008) =	_____
Oak (White)	( _____ )	×	( _____ )	×	(0.003) =	_____
Wet Meadow	( _____ )	×	( _____ )	×	(0.004) =	_____
Willow	( _____ )	×	( _____ )	×	(0.007) =	_____
<b>Sum Total of the Estimated PM10 for the project in tons/project</b>						<b>= _____</b>
1. See Table 3 on next page for values used to calculate EVs.						
2. For vegetation types not listed, contact Air District for assistance with determining appropriate emission factors.						

**Table 4-3 Emission Values (EV) For Prescribed Burns of Various Vegetation Types\***

Estimated PM10 emission values for various vegetation types =  
 (% combustion) x (PM10 emission lbs/ton) x (1 ton/2000 lbs)\*

EMISSION VALUE VEGETATION	PM Emissions			PM10	
	% Combustion	(lbs/ton fuel)	Conversion Factor	PM 10 (lbs/emissions /ton fuel)	
Basing Sage/Low Sage	= (1.0)	x (20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.010	
Ceanothus	= (1.0)	x (20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.010	
Chamise	= (0.9)	x (20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.009	
Grass/Forb	= (1.0)	x (15 lbs/ton)	x (1 ton/2000 lbs)	= 0.007	
Hackberry Oak	= (0.4)	x (25 lbs/ton)	x (1 ton/2000 lbs)	= 0.005	
Hardwood (Stocked)	= (0.4)	x (15 lbs/ton)	x (1 ton/2000 lbs)	= 0.003	
Hardwood (Non-stocked)	= (0.4)	x (15 lbs/ton)	x (1 ton/2000 lbs)	= 0.003	
Live Oak (Canyon)	= (0.6)	x (25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007	
Live Oak (Interior)	= (0.6)	x (25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007	
Manzanita (Productive Brush)	= (0.9)	x (20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.009	
Mixed Chaparral/Montane	= (0.8)	x (20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.008	
Oak (White)	= (0.4)	x (15 lbs/ton)	x (1 ton/2000 lbs)	= 0.003	
Wet Meadow	= (0.6)	x (15 lbs/ton)	x (1 ton/2000 lbs)	= 0.004	
Willow	= (0.6)	x (25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007	

\* Percent combustion and PM10 emission factors for various fuel types derived from Table 8, Section 6, "Air Quality Conformity Handbook" from the USDA-Forest Service Air Resources / Fire Management Pacific Southwest Region dated November 1995.

\*\* These are the vegetation's estimated emissions values(EV) from the vegetation type as determined above to be use when the burn operator provides the vegetation's fuel loading estimate per acre.

\*\*\* For additional information on emissions factors, see EPA document AP-42: "Compilation of Air Pollutant Emission Factors. Volume I: Stationary Point and Area Sources," Fifth Edition, AP-42, January 1995, U.S. EPA. Table 2.5-5.

Burn Timing: Preferred burn season for the fire is late spring early summer. Burn objectives are to negatively impact the exotic seed source while burning during the early stages of curing or drying. Hours of the burn or ignition will not take place before 0900 and will be complete before 1600.

The degree of impact to air quality is rated by the following threshold criteria:

### Type of Impact

Beneficial: Reduces emissions or lowers pollutant concentrations.  
Adverse: Increases emissions or raises pollutant concentrations.

### Duration of Impact

Short-term: Associated with the duration of a specific fire event.  
Long-term: Emissions persist beyond the season in which a specific fire event occurred.

### Intensity of Impact

Negligible: Less than 5% increase or decrease compared to the existing program.  
Minor: 5 to 20% increase or decrease compared to the existing program.  
Moderate: 21 to 50% increase or decrease compared to the existing program.  
Major: 50% increase or decrease compared to the existing program.

The relative impacts of the four alternatives on air quality are compared by calculating the suspended particulate emissions (PM10) expected under alternative burn scenarios (Table 4-4). For the purposes of the analysis it is assumed that particulate emissions are proportional to the other air pollutants produced in smoke emissions. The amount of particulates generated by different size wildfires are estimated by assuming the heaviest fuel type for small fires (10 acres) and assuming a mix of vegetation types in the proportions in which they occur in the Santa Monica Mountains for moderate and large wildfires (1000 and 10,000 acres).

**Table 4-4 Particulate Emissions (PM10) For Prescribed Burning Alternatives**

	Area (acres) <sup>1</sup>	Fuel load (tons/acre)	EVI (lbs emissions/ ton fuel)	PM 10 <sup>2</sup> (lbs)
<b>Alternative 1</b>				
<i>Landscape mosaic prescribed burning</i>				
Sage	1500	5	0.01	<b>75.0</b>
Chamise	1500	17	0.009	<b>229.5</b>
Ceanothus	1500	31	0.01	<b>465.0</b>
<b>Alternative 2</b>				
<i>Strategic prescribed burn</i> (2 maximum/year)				
Sage	150	5	0.01	<b>7.5 (15)</b>
Chamise	150	17	0.009	<b>23.0 (26)</b>
Ceanothus	150	31	0.01	<b>46.5 (93)</b>
<b>Alternatives 2, 3</b>				
<i>Ecological prescribed burn</i> (4 maximum/year)				
Grass/forb	275	2	0.007	<b>3.9 (15.6)</b>
<b>All Alternatives</b>				
<i>Wildfire suppression</i>				
10 acres				
Ceanothus	10	31	0.01	<b>3.1</b>
1000 acres				
Grass/forb (6%)	60	2	0.007	0.8
Sage (26%)	260	5	0.01	13.0
Chamise (3%)	30	17	0.009	4.6
Ceanothus (65%)	650	31	0.01	201.5
<b>Total</b>				<b>219.9</b>
10,000 acres				
Grass/forb (6%)	600	2	0.007	8.4
Sage (26%)	2600	5	0.01	130.0
Chamise (3%)	300	17	0.009	45.9
Ceanothus (65%)	6500	31	0.01	2015.0
<b>Total</b>				<b>2199.3</b>

<sup>1</sup> Area is the maximum size of individual projects in one year.

<sup>2</sup> PM10 values are for one project at the maximum proposed size, the PM10 values in parentheses are the values for the proposed maximum number of projects in one year.

## *Proposed Actions*

### Wildfire Suppression

Wildfire suppression occurs for all wildfires within the SMMNRA. Under the existing program of complete wildfire suppression, fires occur that range in size from 0.3 acres to 43,043 acres, with a median fire size of 76 acres. A median size fire (with mixed fuel) will generate an estimated 18 lbs of particulates, and a large fire (10,000 acres) will generate 2199 lbs of particulates. Large fires are an infrequent, but re-occurring event that will occur despite the most intensive suppression efforts. Suppression is effective in limiting the size of fires under mild and moderate climactic conditions, and therefore reduces the total wildfire emissions for fires that start in the less extreme weather conditions. Total emissions from wildfires depend on atmospheric conditions as well as fire size, however. Dispersion of pollutants may occur more quickly under the more severe (high wind) conditions likely to occur in large fires than under conditions when fires are more easily controlled and remain smaller.

### Mechanical Fuel Reduction

Mechanical fuel reduction when performed with motorized equipment can generate air pollutants, including carbon monoxide (CO), particulate matter, nitrous oxides (NO<sub>x</sub>), and volatile organic compounds (VOC). Equipment may run on gasoline or diesel and include chain saws, weed eaters, chippers, and tractor-mowers.

Mechanical fuel reduction projects on NPS lands with shrub dominated vegetation are generally done with hand tools, chain saws, and weed-eaters on small localized areas at the urban interface. Level grassland areas adjacent to roads and residences are mowed or disked with tractor-pulled equipment. A total of 90 acres/year is treated by mechanical fuel reduction on NPS parklands. This area will continue to be maintained under all alternatives. The park units and acreage to be treated are identified in Figure 2-1 and Table 2-4.

### Ecological Prescribed Fire

Prescribed fire produces emissions depending on the fuel type and the amount of area burned. Ecological prescribed fire is proposed only in grassland and oak savanna vegetation types with relatively low fuel loadings and emission production. A maximum of 275 acres/project with a maximum of 4 projects/year is proposed.

### Strategic Fuel Reduction

Strategic fuel reduction generates emissions through either prescribed burning or mechanical fuel reduction as described above. A maximum of 2 projects/year with 150 acres/project is proposed. Because specific strategic fuel reduction sites have not been identified, each project will require individual environmental review.

### Education and Community Support

Education and community support have no direct effect on air quality.

## *Summary by Alternatives*

### Impacts Common to All Alternatives

Emissions that occur during wildfires would occur under all alternatives as wildfires will continue to be only partly controlled even with a policy of complete wildfire suppression. Wildfire suppression has beneficial effects in that it reduces pollutant concentrations by limiting fire size; it is a short-term physical effect that occurs at the time of individual fires; the impact on air quality is considered negligible because there is no change in the existing fire management program.

Emissions from mechanical fuel reduction are also common to all alternatives. Mechanical fuel reduction has adverse impacts in that it increases pollutant emissions; it is a short-term impact that occurs during fuel modification activities; the impact on air quality is considered to be negligible because it is an ongoing activity, with no increase in area over the existing program.

Any indirect benefits from reduced fire spread through education and community support would accrue equally to all alternatives. To the extent that community education can limit structure loss or the spread of fire through communities, education would have a beneficial, minor, short-term effect on air quality.

### Alternative 1 – No-Action Alternative

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential air quality impacts among all alternatives. Emissions are five times greater than those from strategic fuels reduction (Alternative 2) and 5 to 31 times those from ecological prescribed burning (Alternatives 2, 3), depending on the vegetation type. Impacts on air quality from landscape mosaic burning are adverse, short-term and negligible if carried out in compliance with local air quality control board standards.

### Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

Alternative 2 has the second greatest potential air quality impacts due to the addition of the strategic fuels reduction option, when compared to Alternatives 3 and 4. However, relative to the potential air quality emissions of the no action alternative, emissions from strategic fuels reduction are significantly lower (15-93 lbs/year vs. 75-465 lbs/year) and are therefore considered to have a negligible impact on air quality. Considered over the long-term, strategic fuel reduction would have a net beneficial impact on air quality if it could be demonstrated that fuel modification of a localized area would allow strategic control of fires to limit the wildfire size and protect structures from fire loss.

### Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

Ecological prescribed fire has adverse impacts in that it increases pollutant emissions; it is a short-term impact that occurs during or shortly after burns; the overall impact on air quality is considered negligible in that there is a significant reduction in emissions compared to the No-Action Alternative (Alternative 1) — 15 lbs/year vs. 75-465 lbs/year.

## Alternative 4 - Mechanical Fuel Reduction

The impact on air quality from mechanical fuel modification actions are considered to be negligible because it is an ongoing activity, with no increase in emissions over the No-Action Alternative (Alternative 1).

### Conclusions

Alternative 4 minimizes air quality impacts, although impacts from Alternatives 2, 3, and 4 are negligible compared to the No-Action Alternative (Alternative 1).

### *Mitigation Measures*

#### Prescribed Burning

- 1) Burn days will be selected for their ability to transport smoke to upper elevations and lessen the impacts to the local populations.
- 2) Identification of smoke-sensitive areas. All high density populous communities should be considered smoke sensitive areas. Burns will be planned to carry smoke away from smoke-sensitive areas. Maps of smoke-sensitive areas relative to the burn unit will be included in the burn plan (paper version). The map will indicate all possible directions that smoke may impact communities.
- 3) If hazardous or unhealthful smoke conditions occur and become difficult to control under prescribed burn status, the fire can be declared a wildfire in order to cease ignition and suppress it with a full brush response available from Los Angeles and Ventura County Fire Departments. Unhealthful conditions are defined as chronic smoke that exceeds federal ambient air standards (PM-10 exceeding 150 /mg for 24 hours) in a smoke-sensitive area. Further ignition is precluded and immediately reverses the smoke production trend.
- 4) If hazardous or unhealthful smoke conditions are observed (visibility less than three miles) in smoke-sensitive areas, the Fire Management Officer (FIO) will advise the Chief Ranger and the Public Information Officer. The FIO will coordinate notification about the smoke conditions and provide information about potential health impacts, after consultation with the Burn Boss and FIO. The Superintendent has the option to close the park area impacted or have the local rangers advise visitors to leave areas impacted by unhealthful smoke, the FIO would advise the media and answer phone calls.

## **IV Impact Topics**

### **B Cultural/Historic Resources**

#### *Threshold Criteria*

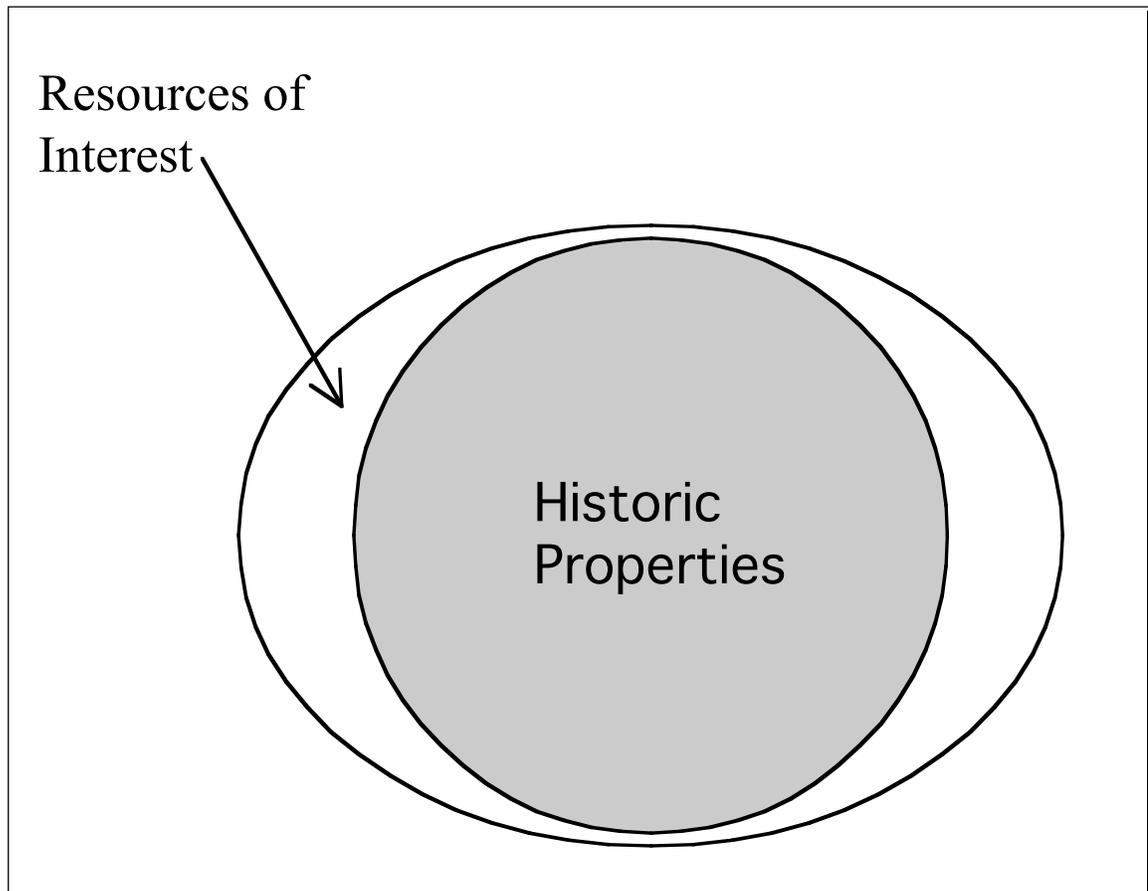
Fire management actions such as prescribed fire, suppression, and mechanical treatments have the potential to impact cultural resources such as archeological sites, structures, ethnographic resources,

and cultural landscapes. Museum objects can also be threatened by such actions, both the physical well-being of the objects themselves, and the ability to properly catalog and process those objects. Section 106 of the National Historic Preservation Act requires Federal agencies to consider the effects of its actions on properties listed in, or eligible for inclusion in, the National Register of Historic Places (i.e., Historic Properties), and allow the Advisory Council on Historic Preservation a reasonable opportunity to comment. Proper management of museum objects is dictated by 36 CFR 79.

Presently the agencies comprising the Department of the Interior, including NPS, and U.S. Department of Agriculture are developing a nationwide Programmatic Agreement with each state's respective Historic Preservation Office, the National Council of State Historic Preservation Offices, and Advisory Council on Historic Preservation. This document will follow procedures outlined in 36 CFR 800.14(b) of Section 106 of the National Historic Preservation Act. Among the core elements of the Programmatic Agreement include professional qualifications, standard protocols for cultural resources compliance for fire management actions, Indian Tribe and public participation, agency review procedures, and inadvertent effects. The benefit of Programmatic Agreement will be greatly expedited Section 106 compliance review for fire management actions, as well as the establishment of standard protocols for most effectively identifying, evaluating and protecting cultural resources during planned and unplanned fire management actions.

Terms found in Section 106 of the National Historic Preservation Act are used to describe cultural resource significance and effects in this section. However, it is important to distinguish Historic Properties (as defined above) from resources of interest, which are those classes of resources that have some potential to be important, and have the potential to be impaired by the fire management action. While Historic Properties are de facto resources of interest, these might also include sites, features, structures or other phenomenon that do not meet National Register of Historic Places criteria of significance, the minimum age requirement, and/or possesses sufficient integrity, but contribute somehow to our understanding of prehistory, history, or traditional lifeways, and could be compromised (Fig. 4-1). Each resource of interest is comprised of a set of attributes, called significant characteristics, which lend importance to that resource. An example of a resource of interest at SMMNRA are small, sparse flaked stone lithic scatters. Such resources typically have low data potential and diminished integrity due to historic land-use practices, and would generally not qualify as Historic Properties. However, when one considers that many of the Native American archeological resources found in the Santa Monica Mountains region have been heavily impacted by urban development and other disturbances, small, sparse flaked stone lithic scatters command greater importance as sources of information for understanding Native American lifeways in the area. As such, these sites deserve consideration when threatened by impacts from fire management actions.

Figure 4-1 Relationship Between Historic Properties and Resources of Interest



### *Impacts*

The NEPA recognizes three types of impacts—direct, indirect, and cumulative. Direct impacts are those that are caused at the same time and place as the action, indirect impacts occur later in time and at a distance, while cumulative impacts are additive. In regard to cultural resources, direct, operational and indirect effect categories are utilized. Direct effects are those where the fire itself is the cause of the impacts, operational effects occur as a result of associated operations like line construction or staging, while indirect effects are ones where fire and/or associated operations result in changes to local context such that cultural resources will be effected (e.g., increased surface runoff and erosion, increased tree mortality). As such, direct and operational effects for cultural resources are the equivalent of direct impacts under NEPA, while indirect effects on cultural resources correspond to indirect and cumulative impacts.

One major impediment to cultural resources compliance related to fire management actions is a poor understanding of the nature of direct, operational and indirect effects. In an effort to remedy this situation, Federal agencies sponsored the preparation of a volume on fire effects on cultural resources to be published through the U.S. Forest Service “Rainbow Series” on fire effects. This document has yet to appear, so a review of existing fire effects knowledge was prepared

and is presented in Appendix B. The appendix broadly summarizes known direct fire effects on those components that comprise the cultural resources of SMMNRA (e.g., stone, bone, glass, metal, wood, vegetation), and operational and indirect effects that could potentially occur as a result of the proposed fire management actions.

The NEPA also dictates that potential impacts be considered in regard to type (adverse, beneficial) duration (short term, long term, permanent) and intensity. The Section 106 process considers only the adverse effects upon cultural resources, not potentially beneficial ones. An ordinal scale of impact intensity (negligible, minor, moderate, major) is also foreign to the Section 106 process — effects are either adverse (when the integrity of the historic property is diminished due to the undertaking) or they are not. Duration is not typically factored when assessing effects during the Section 106 process. These issues are considered in greater detail below in relation to direct, operational and indirect effects.

The following measures are employed to assess impacts of fire management actions on cultural resources. Further rationale for each measure is provided in discussions of direct, operational, and indirect effects that follow.

### Type of Impact

- Adverse: Changes to the significant characteristics of a resource of interest. These changes may be perceptible and measurable, or, in the case of certain archeological and ethnographic resources, imperceptible and psychological.
- Beneficial: Changes on, or in the vicinity of, a resource of interest such that the significant characteristics of the resource are protected against adverse impacts of fire management actions and/or restored to some desired condition.

### Duration of Impact

#### *Archeological Resources*

- Short Term-Adverse: Changes that result in permanent or temporary loss of data potential in the significant characteristics of a resource of interest, but do not manifest for a period of 10 or fewer years following the fire management action.
- Short Term-Beneficial: Changes that afford protection to the significant characteristics of a resource of interest from fire management actions for a period of no more than 10 years.
- Long Term-Adverse: Changes that result in a permanent or temporary loss of data potential in the significant characteristics of a resource of interest, and manifest in more than 10 years following the fire management action.
- Long Term-Beneficial: Changes that afford protection to the significant characteristics of a resource of interest from fire management actions for a period of no more than 10 to 20 years.

Permanent-Adverse: Changes that result in permanent loss of data potential in the significant characteristics of a resource of interest, and manifest immediately following the fire management action.

Permanent-Beneficial: Changes that result in permanent protection to the significant characteristics of a resource of interest from fire management actions.

### ***Structures***

Short Term-Adverse: Changes that result in a permanent or temporary loss of data potential in a resource of interest, but do not manifest for a period of 10 or fewer years following the fire management action.

Short Term-Beneficial: Changes that afford protection to the significant characteristics of a resource of interest from fire management actions for a period of no more than 10 years.

Long Term-Adverse: Changes that result in a permanent or temporary loss of data potential in a resource of interest, and are manifest in more than 10 years following the fire management action.

Long Term-Beneficial: Changes that afford protection to the significant characteristics of a resource of interest from fire management actions for a period of no more than 10 to 20 years.

Permanent-Adverse: Changes that result in permanent loss of data potential in a resource of interest, and that are manifest immediately following the fire management action.

Permanent-Beneficial: Changes that result in permanent protection to the significant characteristics of a resource of interest from fire management actions.

### ***Ethnographic Resources***

Short Term-Adverse: Temporary changes in the significant characteristics of a resource of interest that do not disrupt the cultural traditions associated with that resource for a noticeable period. This period would vary by resource type and traditional practitioners.

Short Term-Beneficial: Temporary changes in the significant characteristics of a resource of interest that enhance or maintain cultural traditions for a period of no more than one year. For example, burning leaf litter in an oak grove to facilitate acorn collection.

Long Term-Adverse: Temporary changes in the significant characteristics of a resource of interest for a noticeable period. This period would vary by resource type and traditional practitioners.

Long Term-Beneficial: Temporary changes in the significant characteristics of a resource of interest that enhance or maintain cultural traditions for a period of one to 10 years. For example, clearing fuel from a spiritual site to prevent intense fire behavior.

Permanent-Adverse: Permanent changes in the significant characteristics of a resource of interest that result in a loss of cultural traditions associated with that resource.

Permanent-Beneficial: Permanent changes in the significant characteristics of a resource of interest that have the potential to enhance or maintain cultural traditions in perpetuity.

### ***Cultural Landscapes***

Short Term-Adverse: Temporary alteration of the significant characteristics of a resource of interest for a period lasting no more than 10 years. Short term alterations will almost always involve living vegetation.

Short Term-Beneficial: Temporary protection, restoration, or maintenance of the significant characteristics of a resource of interest for a period lasting no more than 10 years.

Long Term-Adverse: Temporary alteration of the significant characteristics of a resource of interest for a period lasting more than 10 years. Short term alterations will almost always involve living vegetation.

Long Term-Beneficial: Temporary protection, restoration, or maintenance of the significant characteristics of a resource of interest for a period lasting more than 10 years.

Permanent-Adverse: Permanent alteration of the significant characteristics of a resource of interest. Permanent alterations will often encompass both living vegetation and other landscape features.

Permanent-Beneficial: Permanent protection, restoration, or maintenance of the significant characteristics of a resource of interest.

### ***Museum Objects***

Permanent: Permanent loss or alteration of museum objects.

### **Intensity of Impact**

In this analysis, intensity of impact is measured relative only to adverse resource impacts.

### ***Archeological Resources***

Negligible: No or barely perceptible and changes to the significant characteristics of a resource of interest.

Minor: Perceptible and measurable changes to the significant characteristics of a resource of interest, but those changes do not inhibit interpretive potential and/or a minor percentage of the significant characteristics will be affected. Resources prone to impacts in this category might include archeological resources containing a high percentage of resources of interest with low vulnerability to the effects of fire management actions and/or possessing subsurface components.

Moderate: Perceptible and measurable changes to the significant characteristics of a resource of interest, but those changes do not inhibit interpretive potential and/or a moderate percentage of the significant characteristics will be affected. Resources prone to impacts in this category might include archeological sites containing a moderate percentage of resources of interest with low vulnerability to the effects of fire management actions and/or possessing subsurface components.

Major: Perceptible changes to the significant characteristics of a resource of interest, and those changes inhibit interpretive potential of a major percentage of the significant characteristics. Resources prone to impacts in this category might include archeological sites containing a large percentage of resources of interest with high vulnerability to the effects of fire management actions.

### ***Structures***

Negligible: Barely perceptible and not measurable changes confined to a single resource of interest or contributing element of a larger National Register district. Changes do not adversely affect significant characteristics.

Minor: Perceptible and measurable changes to a single resource of interest or contributing element of a larger National Register district. Changes do not adversely affect significant characteristics.

Moderate: Perceptible and measurable changes in the significant characteristics of a single resource of interest or small group of contributing elements in a larger National Register district.

Major: Perceptible and measurable changes of substantial magnitude in significant characteristics of a single resource of interest or large group of contributing elements in a National Register district.

### ***Ethnographic Resources***

Negligible: Barely perceptible and not measurable changes to a resource of interest.

Minor: Perceptible and measurable changes to a resource of interest. For example, an important oak grove burns during a wildfire, but not at a time or intensity that impairs acorn production or collection.

Moderate: Perceptible and measurable changes in the significant characteristics of a resource of interest. For example, an important oak grove burns during the fall, consuming a high percentage of acorns and killing a couple of productive trees.

Major: Perceptible and measurable changes of substantial magnitude in significant characteristics of a resource of interest. For example, an important oak grove burns during a severe wildfire, killing the vast majority of productive trees.

### ***Cultural Landscapes***

Negligible: Barely perceptible and not measurable changes to a resource of interest.

Minor: Perceptible and measurable minor changes to a resource of interest. For example, a severe wildfire kills a highly visible concentration of non-contributing oak trees located on the boundary of a rural historic cultural landscape.

Moderate: Perceptible and measurable moderate changes in the significant characteristics of a resource of interest. For example, a fire crew cuts down several contributing fruit trees in a rural historic cultural landscape in preparation for a prescribed burn.

Major: Perceptible and measurable changes of substantial magnitude in significant characteristics of a resource of interest. For example, extreme fire behavior and aggressive suppression action destroys a large number of contributing elements within a rural historic cultural landscape.

## ***Museum Objects***

Not applicable.

## ***Proposed Actions***

### **Wildfire Suppression**

#### ***Direct Effects***

Due to often extreme fire behavior, the direct effects of wildfires on cultural resources can be substantial, including adverse, permanent damage. Wildfires range from extremely small (<0.1 acre) to thousands of acres, and those that grow to substantial size are often driven by a combination extreme weather conditions and heavy fuels. Extremely high fire temperatures can be expected, with the implication that even the most durable cultural resources are vulnerable to major, permanent damage. Large fires will often encompass a high number of cultural resources.

As they are unplanned events, cultural resource specialists rarely have the luxury of benefits conveyed by pre-planning efforts during wildfires. For example, because a relatively small percentage of SMMNRA has been inventoried for cultural resources, it is highly likely that wildfires will occur in areas that lack or have few recorded cultural resources. Information regarding direct effects would in most cases be obtained during the post-burn phase, and involve evaluating those effects on resources for which no pre-burn condition data were available. At present, the principle post-wildfire funding source, Burned Area Emergency Rehabilitation (BAER), prohibits the use of those funds to perform post-burn inventory beyond areas impacted by suppression actions. The need for substantial post-wildfire inventory can impact the ability to complete compliance for planned fire management and other projects.

#### ***Operational Effects***

Operational effects associated with wildfire suppression can often be extreme. The act of constructing fire lines, helispots, staging areas, mopping-up and other ground disturbing processes can have tremendous impacts on cultural resources. Even with Minimum Impact Suppression Techniques (MIST), the placement of fire lines and related phenomenon can be quite unsystematic when compared to planned fire management actions. Use of heavy equipment, which is extremely likely to occur at SMMNRA during suppression actions, can result in even greater impacts.

Large numbers of personnel, from varied backgrounds, are present at any substantial fire. Crews are often spread across a vast area, and their activities difficult to monitor by one or very few resource advisors. Cultural resource looting and vandalism can potentially occur during wildfire.

#### ***Indirect Effects***

Due to high intensity fire and extensive disturbances related to suppression, indirect effects related to wildfires could be adverse. For example, impacts from erosion are typically pronounced in situations where most or all of the fuel has burned, and when soil permeability is reduced. Non-native tree mortality can be very high following wildfires, and the potential for tree-fall and ground disturbance around historic structures can create potential long-term cultural resource management problems. With improved ground visibility, cultural resources may be at greater

risk from looting. As noted above, these problems become even more acute when one considers that sources of funding for post-burn inventory are not readily available.

### Mechanical Fuel Reduction

#### *Direct Effects*

Although fire itself is not technically a component of mechanical treatments, wildfires started by machinery might lead to severe fire behavior and major, permanent adverse resource impacts. Likewise, disposal of cut vegetation on or in close proximity to cultural resources could also result in major, permanent adverse resource impacts at some later date.

#### *Operational Effects*

Operational effects present the greatest concern in regard to the potential impacts of mechanical treatment. Ground disturbance could result in substantial impacts to cultural resources. However, mechanical treatments offer the benefit of pre-planning in that the location(s) of ground disturbance can be specifically delineated, and known cultural resources avoided. In the event that an area cannot be subjected to adequate pre-burn survey due to thick vegetation, a cultural specialist could monitor the mechanical treatment for cultural resources that become exposed. Likewise, less intensive mechanical treatments can be employed in highly sensitive areas. While looting by fuels crews is also a concern, these effects could be minimized through a combination of education and avoiding known resources.

#### *Indirect Effects*

A variety of indirect effects could arise as a result of mechanical treatments. The use of heavy equipment could result in soil compaction, and potential soil erosion on and near cultural resources. The act of thinning vegetation on or near cultural resources might leave them vulnerable to looting. Again, however, the ability to perform pre-treatment survey means that equipment can be excluded from or near cultural resources and vegetation can be strategically left in place to discourage looting. Mechanical treatments also offer the potential benefit of reducing fuel loads in proximity to cultural resources and restoring and/or maintaining historical scenes associated with structures and cultural landscapes, especially in situations where it is not desirable or possible to accomplish these tasks with the direct application of fire.

### Ecological Prescribed Fire

#### *Direct Effects*

Prescribed burns offer the cultural resource specialist the opportunity to attempt to locate, evaluate and mitigate cultural resources prior to the undertaking. In cases where excessive fuel loads, topography or other restrictions place constraints on the amount and/or adequacy of pre-burn survey, it is highly likely that adverse direct impacts could occur. The ability to conduct pre-burn inventories allows the cultural resources specialist to quantitatively and spatially document fuel conditions and other variables that can be used to direct post-burn survey and more meaningfully assess damage to cultural resources that could not be documented and/or mitigated prior to the burn. While prescribed burns as large as 275 acres can be implemented, wildfires have the potential to grow much larger and encompass many more cultural resources.

Prescribed burns are implemented under specific conditions with the intent of achieving specific objectives such as ecosystem restoration, resource protection, and hazard fuel reduction. As such, it is possible, through varied timing or operational procedures (e.g., heading or backing fire) to achieve lower or higher fire intensities to accomplish those objectives. In the context of cultural resources management, a low intensity fire might be utilized on or immediately adjacent to a particular cultural resource, while a high intensity fire could significantly reduce hazardous fuels surrounding the resource. Prescribed burns are implemented at times when the likelihood of escape is low, thereby minimizing potential effects to those cultural resources in close proximity to a burn unit.

Because prescribed burns are implemented under controlled conditions, the cultural resource specialist will often have the opportunity to monitor fire behavior and the effectiveness of mitigation measures during the burn.

### ***Operational Effects***

Most operational activities, such as line construction, associated with prescribed burns are conducted in advance of the actual burn. This affords the cultural resources specialist the opportunity to survey those locations prior to any disturbances, and make necessary adjustments in order to avoid or minimize operational effects. The cultural resource specialist can also brief fire personnel on the proper protocol in and around cultural resources.

Because prescribed fires are unlikely to escape the boundaries of the burn units there is little chance of suppression-related operational effects. In the event of an escape, however, the presence of a cultural resource specialist, along with pre-burn contingency planning, will allow for a greater chance to mitigate or minimize potential adverse operational effects. Ground disturbances associated with mop-up and rehabilitation are usually few or none following prescribed burns. As discussed below, this contrasts sharply with suppression during wildfires.

### ***Indirect Effects***

The benefit of pre-burning planning allows the cultural resources specialist to account for potential indirect effects. For example, if high tree mortality is a concern following the burn, efforts can be taken to reduce the number of trees in proximity to a cultural resource. Some indirect effects like erosion are exacerbated by intense fire behavior, the type that is unlikely to occur over large areas during prescribed burns.

### **Strategic Fuel Reduction**

Same as Ecological Prescribed Fire.

### **Education and Community Support**

Impacts associated with education and community support will largely be beneficial, although highly dependent on the nature of the fire management action. Pre-planned events such as prescribed fires and mechanical treatment provide the opportunity to demonstrate the effectiveness of cultural resources compliance to local Native American communities and the interested public.

During unplanned events, such as wildfires, time for effective communication is often more limited and can be more controversial since resources are often damaged.

## *Summary by Alternatives*

### Impacts Common to All Alternatives

The amount of mechanical thinning to be performed in WUI areas and cultural resources is the same in all alternatives. Direct effects resulting from mechanical thinning would not be common, but are likely to be adverse. Operational effects could be avoided or minimized through adequate pre-planning and monitoring. Potential indirect effects can be mitigated by the ability to perform pre-treatment survey, and to avoid ground disturbance directly on or in close proximity to cultural resources, ensure proper debris disposal, etc. The act of performing annual mechanical thinning on and adjacent to cultural resources will be a beneficial impact with regard to the success of long term preservation.

### Alternative 1

This alternative includes mechanical thinning, 1000-1500 ac. of strategic prescribed fire, and wildfire suppression. Strategic prescribed fire provides the ability to perform pre-treatment surveys and mitigation measures, thereby minimizing direct, operational and indirect effects. The rate of proposed treatment with strategic prescribed fire is rapid enough to ensure that resources can be treated before experiencing the effects of a wildfire, but perhaps too ambitious with regard to completing necessary cultural resource compliance given staffing at SMMNRA.

### Alternative 2

Actions associated with Alternative 2 include mechanical thinning, 0-1400 ac. of ecological prescribed burning, 150 ac. of strategic prescribed burning, and wildfire suppression. Beneficial impacts of this alternative include the ability to pre-plan for prescribed burns and mechanical treatments. On the other hand, heavy reliance on prescribed burning means that those cultural resources vulnerable to direct fire effects could be adversely impacted in situations where adequate pre-burn survey and/or mitigation could not be employed. The rate of treatment in Alternative 2 is more modest than that for Alternative 1, and perhaps more realistic in terms of the ability to complete cultural resource compliance.

### Alternative 3

Actions associated with Alternative 3 are the same as Alternative 2, minus the 150 ac. of strategic prescribed burning. Impacts would be similar to those reported for Alternative 2.

### Alternative 4

Actions associated with Alternative 4 include mechanical thinning and wildfire suppression. Mechanical treatments allow for pre-planning, but the rate of treatment is too slow to sufficiently minimize the impacts of future wildfires.

## Conclusions

Alternative 2 is the environmentally superior alternative because strategic fuel modification projects will, by definition, modify wildfire behavior, while any potential adverse impacts from implementation actions would be identified and mitigated in the EA required for such projects. Alternative 1 has the greatest potential to adversely impact cultural resources because of the scope of the prescribed burning program, the limited ability to perform pre-planning and survey work, and the limited effectiveness of mosaic prescribed fire to protect cultural resources from wildfire impacts. Alternatives 3 and 4 are neutral with respect to cultural resources, with no major protection benefits or adverse impacts.

## *Mitigation Measures*

The NEPA dictates that all mitigation measures in response to proposed actions be identified, their effectiveness measured, and impacts assessed if the proposed actions were to proceed without mitigation. This analysis differs from Section 106 in that it does not suggest that the level of effect is similarly reduced. Although adverse effects under Section 106 may be mitigated, the effects remain adverse.

Standardized, detailed mitigation measures for fire management actions at SMMNRA will be presented in the Cultural Resource Component (CRC) of the *Fire Management Plan*. The contents of the CRC are dictated by the forthcoming programmatic agreement for fire management actions discussed on page ##. The programmatic agreement will be accompanied by a companion set of guidelines, in which appropriate mitigation measures are identified for the various types of fire management actions. Each respective Historic Preservation Office, the National Council of State Historic Preservation Offices, and Advisory Council on Historic Preservation will ratify these mitigation measures as acceptable, when used appropriately, for mitigating the effects of fire management actions on cultural resources.

Following mandates presented in *Director's Order* 18, RM 18 and NEPA, the NPS fire monitoring program was developed to accomplish a suite of objectives ranging from the acquisition of basic information to providing direction for fire and resource management programs. The recently completed Fire Monitoring Handbook (USDI, National Park Service, 2000) provides standardized methods for monitoring and managing wildland and prescribed fire.

## Wildfire Suppression and Ecological Prescribed Fire

Mitigation of impacts to cultural resources against the effects of fire management actions involves a combination of knowledge of the potential direct, operational and indirect effects of known or suspected resources, appropriate resource inventory methods, and protection and treatment measures. Appropriate mitigation measures can be conveniently divided into pre-action, during-action, and post-action categories. Those that will be employed at SMMNRA include:

### **Pre-Action**

- 1) The following measures should be taken in advance of prescribed burning and in anticipation of wildfire
  - Cultural resources will be considered during all fire management planning efforts.
  - Fire management personnel and other staff will receive annual training on cultural resources and fire management actions.
  - All cultural resources will be evaluated with respect to hazardous fuel loads. As needed, fuel loads will be reduced using methods commensurate with avoiding or minimizing adverse effects. Maintaining light fuel loads on and in close proximity to cultural resources will be emphasized.
  - All areas slated for ground disturbing activities will be subjected to pre-action field surveys. This includes areas likely to be disturbed during future wildfires.
  - Pre-burn survey will be conducted prior to all prescribed burns as dictated by resource distribution and vulnerability, vegetation and topography, and expected fire behavior.
  - Consultation with local Native American communities will continue to occur in the context of fire management actions. Spiritual sites and important plant communities will be identified and appropriately managed for preservation, maintenance, and/or enhancement.
  - Computer and other databases containing cultural resources data will be created and maintained, and made available to fire management personnel in the event of emergencies.
  - Cultural resources specialists from adjacent land management agencies will be consulted in order to coordinate mitigation efforts prior to planned and unplanned fire management actions.
  - Appropriate cultural resources monitoring protocols will be established and implemented.
  - Potential research opportunities to study the effects of fire management actions on cultural resources will be identified.

### **During-Action**

- 1) Appropriate and responsible protection of archaeological resources on NPS property requires the identification and avoidance of prehistoric archaeological sites and sensitive areas. However, due to their vulnerability to vandalism and looting, the location of archaeological sites is confidential by state governmental policy. Access to this information is restricted to few individuals. This situation creates an inherent conflict with the need to identify and avoid such sites during fire suppression efforts. An effective fire management plan must include provision for providing cultural resource expertise and consultation to the Incident Command System. At minimum, this should include a qualified archaeologist in conjunction with the relevant geographic information necessary to identify archaeological sites in the Santa Monica Mountains.

- A cultural resource specialist or resource advisor will be present during all fire management actions where recorded and unrecorded resources of interest are considered at risk. Additional survey will be conducted on an as-needed basis.
- Observations of fire behavior and other variables will be made with respect to recorded cultural resources and/or areas with high probability of containing unrecorded cultural resources.
- Cultural resources data will be shared with fire management personnel as needed to avoid or minimize adverse effects.
- A cultural resource specialist or resource advisor will educate fire management personnel about cultural resources and the potential impacts of fire management actions.

### **Post-Action**

1) Because vast regions of the Santa Monica Mountains have never been surveyed for cultural resources, it is certain that not all of the archaeological sites in the Santa Monica Mountains have been previously identified and recorded. Realizing this, it is important that an effective fire management plan also provide for post-fire surveys. Shortly following a fire is one of the best times to conduct a pedestrian survey because ground visibility is generally very good after the vegetation has burned off. A post-fire surveying program will help to identify additional cultural resources and archaeological sites within NPS owned properties. Combined, the actions outlined above will further the NPS's mandate to preserve, protect, and manage cultural resources in the Santa Monica Mountains.

- The post-action condition of all recorded cultural resources will be assessed. Resources requiring stabilization or other treatment will be mitigated.
- As appropriate, post-action survey will be conducted in previously surveyed and unsurveyed areas. Previously unrecorded cultural resources will be assessed for condition, and stabilization and other protection needs.
- Monitoring and research data will be compiled, evaluated, and used to help refine cultural resource compliance for fire management actions.

### **Fuel Modification**

1) Existing fuel modification sites need to be surveyed for archaeological resources.

## **IV Impact Topics**

### **CI Land Use**

Fire management activities and wildfires were evaluated for their potential to affect land use patterns and urbanization impacts.

## *Threshold Criteria*

### Type of Impact

- Adverse: Increases the amount of development and/or associated urbanization impacts on natural/wildland areas.
- Beneficial: Decreases the amount of development and/or associated urbanization impacts on natural/wildland areas.

### Duration of Impact

- Short-term: Transitory (less than three years), occurring primarily during or just after fire management activities (prescribed fire, biomass removal, etc.)
- Long-term: Permanent change in land use.

### Intensity of Impact

- Negligible: No measurable effect.
- Minor: Effects limited to existing urbanized areas.
- Moderate: Geographically localized effect, does not affect significant natural resource areas
- Major: Effects occur on a landscape level and impact natural/wildland areas.

## *Proposed Actions*

### Wildfire Suppression

During major wildfire events, massive wildfire suppression efforts are required to protect lives and property in the Santa Monica Mountains as a result of the complex intermixing of highly flammable vegetation and development. Increased development in the wildland urban interface has been repeatedly identified as the cause of the escalating public costs of wildland fire suppression. It has been argued that providing public dollars to protect private property in extreme wildfire environment has allowed development and urbanization of the Santa Monica Mountains (Davis, 1999). Wildfire suppression is essential given the existing pattern of development, but in the abstract should be considered to have an adverse impact on land use in the Santa Monica Mountains.

### Mechanical Fuel Reduction

New development sited too close to park boundaries has the potential to adversely impact park resources if vegetation needs to be cleared to protect private structures. Conversely, if structures are located too close to flammable park vegetation, the potential for structure loss exists. The park is currently providing mechanical fuel reduction on park properties where the required defensible space of pre-existing development extends onto park property.

Because fuel modification destroys the habitat values which the park was established to protect,

the NPS proposes to follow the guidelines established in the California Department of Parks and Recreation's policy on fuel modification (Appendix A). This policy statement places the primary responsibility for structure protection on the homeowner through the use of appropriate building materials, building design, and landscaping. The park will agree to remove vegetation only after the homeowner has taken all feasible steps to protect their property and it has been established by scientific analysis that the park vegetation poses a hazard to the safety of the structure.

If local agencies continue to permit new development only in locations where fuel modification is not required on park property, then fuel modification will be neutral with respect to land use impacts.

### Ecological Prescribed Fire

Ecological prescribed fire has no impacts on land use.

### Strategic Fuel Reduction

If the expanding footprint and increased density of development creates pressure to control large wildfires using strategic fuels reduction on park properties, then this is considered to be an adverse land use impact.

### Education and Community Support

Education and co-operation with the local governments that grant development permits is essential. Education needs to emphasize that there are unavoidable environmental impacts that occur with development in the Santa Monica Mountains in order to provide a fire safe environment for homes. The impacts to habitat, wildlife, soil, geology, and watershed values can not be avoided, but can be minimized with appropriate zoning, structure siting, design, construction materials and landscaping.

## *Summary by Alternatives*

### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Wildfire suppression has a major, adverse long-term impact on land use by promoting development in a recurring wildfire environment.

Fuel modification impacts are neutral with respect to land use if new development is located so that no fuel modification is required on park property.

Education and community outreach benefits are identical among all alternatives including the No-Action Alternative (Alternative 1).

### Alternative 1 – No-Action Alternative

The landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has no impact on land use.

### Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

If the expanding footprint and increased density of development in the Santa Monica Mountains creates pressure to control large wildfires using strategic fuels reduction on park properties, then this would be a major, adverse, long-term impact.

### Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

Ecological prescribed fire has no impacts on land use.

### Alternative 4 – Mechanical Fuel Reduction

Impacts to land use from mechanical fuel reduction are considered to be negligible because it is an ongoing activity with no increase in the amount of affected area over the no-action alternative. Impacts are identical among all alternatives

### Conclusions

Alternative 1, 3, and 4 are equivalent in their lack of adverse impacts to land use, but no alternative provides benefits that makes one the superior alternative in this issue area.

### *Mitigation Measures*

#### Fuel Modification

- 1) NPS should continue to consult with Los Angeles and Ventura County Fire Prevention and Planning Departments on structure siting adjacent to park property to ensure that fire safety for new development can be ensured without vegetation clearance on park properties.
- 2) In order to minimize the fuel modification zone, the NPS and other agencies should work together to identify the amount of fuel modification required to protect structures from radiative heat loss or from loss due to direct flame impingement. The NPS should analyze the potential cumulative habitat impacts from fuel modification that exceeds the amount necessary to protect structures (e.g., 100' vs. 200').

#### Education and Community Support

- 1) NPS should work with local governments to develop appropriate zoning for structure siting, design, and construction materials in order to avoid development that creates irreconcilable conflicts between fire safety and environmental impacts.

## IV Impact Topics

### C2 Land Use – Recreation

#### *Threshold Criteria*

Fire management activities and the potential for closures, restrictions and direct effects were evaluated for their potential to affect visitation and an aggregate of recreational activities in the SMMNRA.

#### Type of Impact

Adverse: Reduce visitor participation, quality of visitor experience, and/or service level.  
Beneficial: Enhance visitor participation, quality of visitor experience and/or service level.

#### Duration of Impact

Short-term: Temporary in nature, during the period when a fire management activity would take place.  
Long-term: Permanent effect on the visitor experience.

#### Intensity of Impact

Negligible: Imperceptible or undetectable effect upon visitors.  
Minor: Slightly detectable or localized effect on visitors; < 20% visitors notice effect at the affected area.  
Moderate: Readily apparent localized effects on visitors; 90% visitors notice effect at the affected area; minor restrictions on visitor use.  
Major: Substantial, highly noticeable effects and/or effects that would result in major limits on activities; effect persists beyond the period of active fire management activity.

#### *Proposed Actions*

##### Wildfire Suppression

During periods of major wildfires and active wildfire suppression activity, visitor use is constrained by road closures and the lack of access to areas within the wildfire zone. After a wildfire, park lands may be closed to the public (Title 36 Code of Federal Regulations Part 1, Section 1.5(a) Closures and Public Use Limits and Section 1.7(a) Public Notice.) to protect exposed cultural resources and to prevent soil disturbance from foot traffic in areas that would normally be inaccessible due to vegetation growth. Wildfire suppression itself is therefore interpreted as a temporary adverse impact on recreational uses, but is generally beneficial to the degree that it limits the amount of burned area to which access might be restricted post-fire.

##### Mechanical Fuel Reduction

Mechanical fuel reduction on park properties is performed in very limited areas at the urban interface and has no effect on recreational use of NPS lands.

### Ecological Prescribed Fire

During ecological prescribed burn operations, the affected park land is normally closed to visitor use. Closures occur only on the actual day of the prescribed fire, but there are no subsequent limits on park use after the prescribed burn.

Fire lines cut for prescribed burns are highly visible after the fire and are often used by visitors as new trails. Fire lines after a prescribed fire therefore need to be posted and require additional ranger services to keep visitor use to established trails.

A maximum of 275 acres/project with a maximum of 4 projects/year is proposed for ecological prescribed fire. This would require a maximum of eight days of restricted visitor access at four burn sites.

### Strategic Fuel Reduction

It is not possible to evaluate the recreation impacts of the strategic fuels reduction alternative without a geographically specific project proposal. A maximum of 2 projects/year with 150 acres/project is proposed, subject to environmental analysis. Because these projects are likely to be located in areas of heavy fuel load with complex topography, the number of days to carry out the projects are likely to be more than for ecological prescribed burns in grasslands. They are also likely to be located in more remote areas and have low visitor use. Finally they may require closures after treatment for some of the same reasons areas are closed after wildfires. Counterbalancing the potential direct impacts to recreational use from strategic fuels modification are the theoretical benefits of less acreage burned in wildfires and less adverse recreational impacts associated with large fires.

### Education and Community Support

Recreational experiences can be enhanced with educational opportunities provided by both wildfires and ecological prescribed burn projects. Fires offer the unique opportunity to observe the often dramatic wildfire displays that occur in the first two years following wildfires and to educate the public about the fire adapted nature of the Santa Monica Mountains plant communities. Prescribed ecological fire sites also offer educational opportunities about the beneficial uses of fire and the plant restoration needs in the Santa Monica Mountains.

### *Summary by Alternatives*

#### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Wildfire suppression has an adverse, moderate but short-term impact on recreational use. Wildfires themselves may have a

more long-term impact if large areas of parkland must be closed to visitor use to protect cultural and natural resources.

Fuel modification is common to all alternatives, but will have no impact on recreational use.

Education and community outreach are proposed under all alternatives, but opportunities to positively affect the public's recreational experiences are most obvious following wildfires and with ecological prescribed burns.

### **Alternative 1 – No-Action Alternative**

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential to adversely impact recreational use from the number of closures required during prescribed burn days and for the potential for post-burn closures. Potential impacts to recreation from landscape mosaic burning are considered to be major, adverse, and both short-term and long-term.

### **Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction**

The impacts to recreational use from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis. Both adverse and beneficial impacts are possible.

### **Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction**

Direct impacts to recreational use from ecological prescribed fire are adverse, short-term and moderate. The educational benefits from ecological prescribed fire provide a beneficial, long-term, moderate impact, which outweigh the short term impacts of a local one-day closure.

### **Alternative 4 – Mechanical Fuel Reduction**

Impacts to recreational use from mechanical fuel reduction are negligible.

### **Conclusions**

Alternative 2 is the environmentally superior alternative because it avoids the adverse impacts of the No-Action Alternative (Alternative 1) and includes the benefits of Alternative 3. Alternative 2 includes strategic fuel modification as a fire management technique which has potential adverse recreational impacts, but these are counterbalanced by the potential benefits of reduced acreage burned in wildfires which will need to be evaluated with a project-specific EA.

### ***Mitigation Measures***

- 1) Fire lines should be posted and monitored to avoid creating new and undesirable trails after prescribed burns and wildfires.

- 2) Education walks should be developed on wildfire sites to view wildflower displays that occur in the first two years following wildfires and to educate the public about the fire adapted nature of the Santa Monica Mountains plant communities. Education programs/walks should be developed at prescribed ecological fire sites to show the beneficial uses of fire and the plant restoration needs in the Santa Monica Mountains.

## IV Impact Topics

### C3 Land Use – Scenic Resources

#### *Scenic Resources*

Fire management activities and operations, wildfires, and smoke from prescribed fires were evaluated for their potential to affect the scenic quality of major scenic values.

#### Type of Impact

Adverse: Degrades visual quality.  
Beneficial: Improves visual quality.

#### Duration of Impact

Short-term: Transitory (less than one season), occurring primarily during or just after fire management activities (prescribed fire, biomass removal, etc.).  
Long-term: Effects are detectable eight years after fire treatment; may be irreversible.

#### Intensity of Impact

Negligible: Imperceptible or undetectable.  
Minor: Slightly detectable or limited to a relatively small area; not a scenic viewshed.  
Moderate: Readily apparent from major roads, trails, or other viewpoints; effects short-term.  
Major: Substantial, highly noticeable; within scenic viewshed; and/or results in a change of character of the landscape.

#### *Proposed Actions*

#### Wildfire Suppression

Wildfire suppression activities may locally affect scenic qualities of a park view, but these effects are generally submerged in the large-scale landscape effect of most wildfires. The majority of visitors and the public feel that the burned landscape following a wildfire is visually ugly and disturbing. Fires usually burn in the fall and the first major regrowth does not occur until after the winter rains. Scenic impacts from wildfires therefore persist for 5-6 months until the first wave of regrowth provides vegetative cover of the burn area. Shrublands take about 8 years to reach canopy closure.

Suppression operations may have a limited and temporary adverse impact on scenic qualities, but is overall generally beneficial to the degree that it limits the amount of burned area which is considered to be visually unpleasant.

### Mechanical Fuel Reduction

Mechanical fuel reduction is visually obvious in shrublands and has a strong adverse impact on the visual quality of the mountain landscape. 90 acres of fuel modification on park properties is performed at the urban interface, usually at lower elevations, along park boundaries. The visual impact is significantly less than that which occurs on surrounding private property, especially private residences located on ridgetops and on highly visible slopes.

### Ecological Prescribed Fire

The visual impact of prescribed fire is similar to that of wildland fires, but much more limited in scope. Usually only a small portion of a viewshed is impacted so that the entire landscape does not appear to be “devastated.” Ecological prescribed burns are proposed in annual grasslands, not shrublands, so that the visual impact of the fire will have disappeared after 6 months. Fire lines cut for prescribed burns are highly visible after the fire and may persist even after the vegetation has recovered.

A maximum of 275 acres/project with a maximum of 4 projects/year is proposed for ecological prescribed fire.

### Strategic Fuel Reduction

It is not possible to evaluate the visual impacts of the strategic fuels reduction alternative without a geographically specific project proposal. A maximum of 2 projects/year with 150 acres/project is proposed, subject to environmental analysis.

### Education and Community Support

Education may help alleviate the perception of burn areas as devastated and instead recognize them as one phase in the wildfire cycle.

## *Summary by Alternatives*

### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Wildfire suppression activities may have adverse, minor, short-term impacts on scenic quality. Wildfires themselves have a major, adverse, but short-term impact.

Fuel modification has adverse, moderate, long-term impacts on scenic qualities, but these impacts are pre-existing and common to all alternatives.

Education and community outreach are proposed under all alternatives.

### Alternative 1 – No-Action Alternative

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential to adversely impact scenic resources. Potential impacts to scenic resources from landscape mosaic burning are considered to be moderate, adverse, and short-term.

### Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

The impacts to scenic resources from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis. Both adverse and beneficial impacts are possible.

### Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

Direct impacts to scenic resources from ecological prescribed fire are adverse, short-term and moderate.

### Alternative 4 – Mechanical Fuel Reduction

Fuel modification has adverse, moderate, long-term impacts on scenic qualities, but these impacts are pre-existing and common to all alternatives.

### Conclusions

Alternative 2 is the environmentally superior alternative because it avoids the adverse impacts of the No-Action Alternative (Alternative 1) and shares in common the impacts of Alternatives 3 and 4. Alternative 2 includes strategic fuel modification as a fire management technique which has potential adverse scenic impacts, but these are counterbalanced by the potential benefits of reduced acreage burned in wildfires which will need to be evaluated with a project-specific EA.

### *Mitigation Measures*

None.

## **IV Impact Topics**

### **C4 Land Use – Health and Safety**

#### *Threshold criteria*

Fire management activities and operations and wildfires were evaluated for their potential to affect public health and safety.

### Type of Impact

Adverse: Increases the probability of injury, death or property loss.  
Beneficial: Decreases the probability of injury, death or property loss.

### Duration of Impact

Short-term: Injury does not require professional medical attention; property damage not structural or permanent.  
Long-term: Injury requires professional medical attention; property damage requires structural repairs.

### Intensity of Impact

Negligible: Imperceptible or undetectable.  
Minor: Limited to a single residence.  
Moderate: Limited to a local neighborhood.  
Major: Affects entire community or communities.

### *Proposed Actions*

#### Wildfire Suppression

Wildfire suppression in the fire environment of the Santa Monica Mountains is essential to public health and safety by limiting the extent of wildfires and thereby limiting potential injury, death and property loss from wildfires. Wildfire suppression places fire fighters at risk of injury or death and firefighter safety is considered to be more important than property protection.

#### Mechanical Fuel Reduction

Mechanical fuel reduction to create a defensible space between wildland fuels and structures provides the most effective means of preventing structure loss. Mechanical fuel reduction has numerous adverse impacts on natural resources and should be limited to that amount necessary to ensure structural protection under extreme wildfire conditions. The NPS policy on fuel modification will follow that established by the California Department of Parks and Recreation (Appendix A).

#### Ecological Prescribed Fire

Ecological prescribed fire in annual grasslands and oak savannah has no impact on public health and safety.

#### Strategic Fuel Reduction

Strategic fuels reduction would have a positive benefit on public health and safety if it could be demonstrated that there were geographic locations where it would be effective. The analytical

procedure required to evaluate the potential risk: benefit ratio of any project proposal has been outlined in the discussion of fire hazard assessment (Figure 3-17).

A maximum of 2 projects/year with 150 acres/project is proposed based on what is realistically achievable for park staff and NPS partners. Because specific strategic fuel reduction sites have not been identified, each project will require an individual environmental review.

### Education and Community Support

Education will have positive benefits in promoting public health and safety where it can be used to teach residents appropriate wildfire safety techniques. These include appropriate home maintenance and construction; fuel modification techniques; use of appropriate landscaping; avoidance of plants that increase fuel load; appropriate structure siting; and evacuation plans.

Any education or community program that reduces fire ignitions will provide a significant benefit by reducing fire frequency. Prevention measures might include closing parklands during extreme weather, no camp fires during fire season, and evaluation of road clearing projects. Efforts to effectively address prevention of fires started by arson and power lines are critical.

### *Summary by Alternatives*

#### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Wildfire suppression provides major, beneficial, long-term impacts to public health and safety.

Fuel modification impacts are also common to all alternatives. Fuel modification has moderate, beneficial, long-term impacts to public health and safety.

Education and community outreach impacts are identical among all alternatives and are considered to have major, long-term beneficial effects.

#### Alternative I – No-Action Alternative

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has limited potential to positively benefit public health and safety. Although several prescribed burns have been cited as critical in preventing structure loss in major wildfires (e.g., Monte Nido, Spitzer, 2001; Ventura County Fire Dept., pers. comm.; 1996 Malibu Creek prescribed burn, Frank Padilla, pers. comm.) these reports are largely anecdotal. The fuel load at the time of the fires, the treatment effect on fire behavior in comparison to fire behavior in the absence of treatment, and the return time required for re-treatment are unknown. Both the amount of treated land and the return time required to maintain vegetation in a condition that effectively alters fire behavior are believed to be infeasible and ecologically damaging at the scale proposed in the existing program. Because the program can not be realistically carried out, it does not provide any measurable benefits to public health and

safety.

### Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

Strategic fuels reduction would have a positive benefit on public health and safety if it could be demonstrated that there were geographic locations where it would be effective. The impacts will need to be evaluated with project specific environmental analysis.

### Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

Ecological prescribed fire has no significant impact on public health and safety.

### Alternative 4 – Mechanical Fuel Reduction

Mechanical fuel modification has moderate beneficial long-term impacts to public health and safety. Impacts are identical among all alternatives.

### Conclusions

Alternative 2 is the environmentally superior alternative because it includes the benefits of Alternative 4 (fuel modification) as well as strategic fuel modification which has potential public health and safety benefits. The No-Action Alternative (Alternative 1) and Alternative 3 are inferior relative to Alternative 2 because they include actions that are neutral with respect to public health and safety.

### *Mitigation Measures*

#### Wildfire Suppression – Operational Impacts

- 1) Provide for firefighter safety as a first priority.
- 2) Work with local jurisdictions to develop appropriate zoning to limit new residential development in areas that lack safe ingress and egress due to mid-slope road location, length of access, and surrounding fuel load.

#### Education and Community Outreach

- 1) To prevent loss of life and injury, promote the development of evacuation plans by local agencies and adequate defensible space as a highest priority for community safety.

## **IV Impact Topics**

### **C5 Land Use – Risk of Catastrophic Events**

#### *Threshold criteria*

Fire management activities and operations were evaluated for their potential to limit the risk of catastrophic fires.

### Type of Impact

Adverse: Increases the scope or frequency of large scale fires.

Beneficial: Decreases the scope or frequency of large scale fires.

### Duration of Impact

Short-term: Reduces the scope of individual fires.

Long-term: Reduces the frequency of large scale fires.

### Intensity of Impact

Negligible: Imperceptible or undetectable.

Minor: Fires 1 -100 acres.

Moderate: Fires 100-10,000 acres .

Major: Fires >10,000 acres.

## *Proposed Actions*

### Wildfire Suppression

Despite the most intensive suppression efforts, large fires are an infrequent, but re-occurring event. These fires occur under the most extreme climactic conditions and have the potential to be catastrophic in terms of their size, post-fire watershed impacts, and their potential to cause significant loss of life and property. Wildfire suppression in this environment is both essential and beneficial.

### Mechanical Fuel Reduction

Mechanical fuel reduction on park properties has no impact on reducing the risk of catastrophic fire, although it reduces the probability of structure loss when catastrophic fires do occur.

### Ecological Prescribed Fire

Ecological prescribed fire in annual grasslands and oak savanna has no impact on reducing the risk of catastrophic fire.

### Strategic Fuel Reduction

Strategic fuels reduction would have a positive benefit on the risk of catastrophic fires if it could be demonstrated that there were geographic locations where it would be effective. The analytical procedure required to evaluate the potential risk: benefit ratio of any project proposal has been outlined in the discussion of fire hazard assessment (Figure 3-17). Because specific strategic fuel reduction sites have not been identified, each project will require an individual environmental review.

### Education and Community Support

Any education or community fire prevention program that reduces fire ignitions will potentially reduce the probability of catastrophic wildfires. Catastrophic fires are most often linked to ignition by arson or power lines and any measures to effectively limit this source of ignition would reduce the frequency of catastrophic wildfires.

## ***Summary by Alternatives***

### **Impacts Common to All Alternative**

Wildfire suppression impacts are common to all alternatives. Wildfire suppression provides major, long-term benefits to the risk of catastrophic wildfires.

Fuel modification impacts are also common to all alternatives. Fuel modification has no impact on the risk of catastrophic wildfires

Education and community outreach impacts are identical among all alternatives and are considered to have major, long-term beneficial effects.

### **Alternative 1 – No-Action Alternative**

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has limited potential to reduce the risk of catastrophic wildfires. Large fires are driven by climactic conditions that allow fires to burn through all age classes of vegetation except possibly the very youngest. It does not provide any measurable benefits to public health and safety. The effect of the current program is considered to have a negligible impact on reducing the risk of catastrophic wildfire.

### **Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction**

Strategic fuels reduction would have a positive benefit on reducing the risk of catastrophic wildfire if it could be demonstrated that there were geographic locations where it would be effective in controlling fire spread. The impacts will need to be evaluated with project specific environmental analysis.

### **Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction**

Ecological prescribed fire has no significant impact on reducing the risk of catastrophic wildfire.

### **Alternative 4 – Mechanical Fuel Reduction**

Mechanical fuel modification has no significant impact reducing the risk of catastrophic wildfire.

## **Conclusions**

Alternative 2 is the environmentally superior alternative because it is the only alternative which

includes a fire management technique (strategic fuel modification) that has the potential to reduce the risk of catastrophic wildfire.

## ***Mitigation Measures***

### **Education and Outreach**

- 1) The NPS and other agencies should to continue to co-operate in all activities that promote fire prevention in order to reduce fire frequency. The NPS should continue to evaluate the cause of fires and support projects that effectively limit fire starts especially arson and power line ignitions.

## **IV Impact Topics**

### **D Cumulative Impacts**

The Council on Environmental Quality (CEQ) regulations implementing NEPA, require assessment of cumulative impacts in the decision-making process for federal projects. Cumulative impacts are defined by CEQ as “*the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions*” (40 CFR 1508.7). Cumulative impacts are analyzed for both the no-action and action alternatives.

### ***Proposed Actions***

#### **Wildfire Suppression**

Action will be taken to suppress every fire in the SMMNRA; as a result, most fire starts will be suppressed or limited in scope, but a small percentage will escape initial attack and become major wildland fires. In large wildfire events, suppression operations are not under the control of the NPS, but rest with Los Angeles or Ventura County Fire Departments. The NPS has the ability to provide an engine crew and perform an advisory role to other agencies whose actions will have a direct impact on resources and public safety.

Impacts from wildfire suppression to vegetation, wildlife, habitat connectivity, non-native species, special status animals, soil, water resources/wetlands, and recreation/scenic are mixed: there are adverse operational impacts but the total area burned and the average fire rotation interval are reduced. Impacts to air quality, health and safety, and risk of catastrophic events are all reduced by fire suppression. Cultural resources, special status plants, paleontological resources, and land use have the potential to be adversely impacted by wildfire suppression.

The operational impacts associated with fire suppression have the potential to have a cumulative adverse impact because of the number and quality of resources that can be affected, the high fire

frequency, and the quantity of fire fighting resources that are allocated to incidents. For example, the Pacific Coast Fire (January, 2003) had 1000+ firefighters deployed on an approximately 750 acre fire. One hundred sixty-five engine strike teams (825 engines), 25 single engines, 129 hand crews, 50 water tenders, and 13 bulldozers were deployed on the 16,516 acre Old Topanga Fire (November, 1993). These massive firefighting resources may be the most serious factor contributing to cumulative operational impacts because of the lack of resource knowledge and resource protection values of field firefighting crews; lack of communication regarding resource protection between the incident command team and field crews; and lack of field oversight for resource protection. NPS needs to fully participate in the Incident Command structure of wildland fire incidents occurring within the park boundaries, in order to minimize the operational impacts that may occur to resources due to a lack of oversight and input from park management specialists.

### *Mechanical Fuel Reduction*

Mechanical fuel reduction is performed in a very limited area by the NPS and other parks agencies including the California Department of Parks and Recreation and Mountains Recreation and Conservation Authority. Fuel reduction projects are common along roadways and are performed by County public works or County fire crews. The vast majority of mechanical fuel reduction occurs on private property around residential and other structures and is required on an annual basis by the Ventura County, Los Angeles County, and Los Angeles City Fire Departments.

Cumulative impacts from fuel modification are negligible or unknown for air quality, special status plants and animals, paleontological resources, and the risk of catastrophic wildfires.

Mechanical fuel reduction has significant adverse cumulative impacts on vegetation, wildlife, habitat connectivity, non-native species, soil, water resources/wetlands, and scenic resources. However fuel modification provides significant benefits to health and safety because it is the most effective method of structure protection at the wildland interface. The cumulative impacts can not be eliminated because of the necessity to protect lives and property. However, the effects can be reduced by limiting the fuel modification zone around homes to the minimum required to effectively protect structures; by limiting development to defensible sites (i.e., off of ridgelines and setback from steep slopes); and by limiting development to existing developed zones with safe access (i.e., no lengthy or midslope driveways).

### Ecological Prescribed Fire

Carried out at the landscape level in shrubland community types, prescribed fire has the potential to adversely impact vegetation, wildlife, habitat connectivity, non-native species, soil, water resources/wetlands, air quality, special status plants and animals, cultural resources, paleontological resources, recreational, and scenic resources. At the same time it provides no predictable benefits to health and safety or to reducing the risk of catastrophic wildfires. However when prescribed fire is used for restoration or exotic species control in degraded grassland and oak savanna plant communities the impacts shift from adverse to beneficial.

The cumulative impacts of prescribed fire in the Santa Monica Mountains are unknown at this time. The scope of prescribed burn projects, the vegetation type, and the project objectives of the California Department of Parks and Recreation, and Los Angeles and Ventura County Fire Departments are unknown. These agencies seem to be reducing the amount of prescribed burning in shrublands that they have planned for the future.

### Strategic Fuel Reduction

It is not possible to evaluate the cumulative impacts of strategic fuels reduction without geographically specific project proposals. The analytical procedure required to evaluate the potential risk:benefit ratio has been outlined in the discussion of fire hazard assessment (Figure 3-17). Each project will require an individual environmental review and a maximum of 2 projects/year with 150 acres/project is proposed for NPS lands. If carried out on a large-scale basis, cumulative impacts could be similar to those of landscape prescribed burning and/or mechanical fuel modification.

### Education and Community Support

NPS community education and support programs will combine to create cumulative benefits with existing community and agency programs to promote fire safety and environmental protection.

### *Summary by Alternatives*

#### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Cumulative impacts from wildfire suppression are indistinguishable among alternatives.

Fuel modification impacts are common to all alternatives. Cumulative impacts from wildfire suppression are indistinguishable among alternatives.

Cumulative benefits from education and community outreach are identical among all alternatives.

#### Alternative 1 – No-Action Alternative

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the greatest potential to contribute to adverse cumulative impacts to vegetation, wildlife, habitat connectivity, non-native species, soil, water resources/wetlands, air quality, special status plants and animals, cultural resources, paleontological resources, recreational and scenic resources. The magnitude of cumulative impacts is unknown as other agencies appear to be reducing the amount of prescribed burning they will do in shrubland vegetation types and the scope of their future projects is unknown.

#### Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

The cumulative impacts from strategic fuels reduction are unknown and will depend on the impacts associated with projects outside of NPS lands.

### Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

Cumulative impacts from ecological prescribed fire are unknown as the scope and objectives of prescribed burns on land outside of NPS properties are unknown.

### Alternative 4 – Mechanical Fuel Reduction

Cumulative fuel modification impacts are common to all alternatives.

### Conclusions

There are no significant difference among alternatives with respect to the SMMNRA's contribution to cumulative impacts from park fire management actions.

### *Mitigation Measures*

Although there are no significant differences among alternatives with respect to the SMMNRA's actions, significant cumulative impacts for different types of fire management actions were identified. Mechanical fuel modification and suppression operations have a significant cumulative impact on the SMMNRA's resources. Mitigation measures to reduce operational and fuel modification impacts previously identified in the individual topic sections are recommended to reduce these cumulative impacts.

## **IV Impact Topics**

### **E Impairment**

In addition to determining the environmental consequences of the preferred and other alternatives, NPS policy (Management Policies 2001) requires analysis of potential effects to determine whether or not actions would impair park resources. Policies that clarify terms pertaining to "impairment," as well as a prohibition on impairment and what constitutes impairment, are found in Management Policies 2001 (Section 1.4.2 through 1.4.7), which are summarized below.

The fundamental purpose of the National Park System, established by the National Park Service Organic Act (1916) and reaffirmed by the General Authorities Act (1970), as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources and values. However, the laws do give the NPS the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the NPS the management discretion to allow certain impacts within the parks, that discretion is limited by the statutory requirement that the NPS must leave park

resources and values unimpaired for future generations, unless a particular law directly and specifically provides otherwise.

Prohibited impairment may include any impact that, in the professional judgement of the responsible NPS manager, would harm the integrity of park resources or values, including opportunities that otherwise would be present for the enjoyment of those resources or values. An impact to any park resource or value may constitute impairment. An impact more likely would constitute impairment to the extent it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- Identified as a goal in the park's general management plan or other relevant NPS planning documents.

## *Proposed Actions*

### Wildfire Suppression

Action will be taken to suppress every fire in the SMMNRA; as a result, most fire starts will be suppressed or limited in scope, but a small percentage will escape initial attack and become major wildland fires. In large wildfire events, suppression operations are not under the control of the NPS, but rest with Los Angeles or Ventura County Fire Departments. The NPS has the ability to provide an engine crew and perform an advisory role to other agencies whose actions will have a direct impact on resources and public safety.

Impacts from wildfire suppression to vegetation, wildlife, habitat connectivity, non-native species, special status animals, soil, water resources/wetlands, and recreation/scenic are mixed: there are adverse operational impacts but the total area burned and the average fire rotation interval are reduced. Impacts to air quality, health and safety, and risk of catastrophic events are all reduced by fire suppression. Cultural resources, special status plants, paleontological resources, and land use have the potential to be adversely impacted by wildfire suppression actions.

The use of MIST (Minimum Impact Suppression Techniques) on NPS parkland will avoid impairment to resources on parkland during suppression activities.

### *Mechanical Fuel Reduction*

Mechanical fuel reduction is performed in a very limited area by the NPS, largely in areas which have been converted to non-native habitat for many years. There is no impairment of park resources from the proposed mechanical fuel modification actions.

### Ecological Prescribed Fire

Carried out at the landscape level in shrubland community types, prescribed fire has the potential to adversely impact vegetation, wildlife, habitat connectivity, non-native species, soil, water resources/wetlands, air quality, special status plants and animals, cultural resources, paleontological resources, recreational, and scenic resources. At the same time it provides no predictable benefits to health and safety or to reducing the risk of catastrophic wildfires. When prescribed fire is used for restoration or exotic species control in degraded grassland and oak savanna plant communities the impacts shift from adverse to beneficial. There is no impairment of park resources when prescribed fire is used for the purpose of ecological restoration in annual grasslands.

### Strategic Fuel Reduction

The impacts of strategic fuels reduction can not be evaluated without geographically specific project proposals. The analytical procedure required to evaluate the potential risk:benefit ratio has been outlined in the discussion of fire hazard assessment (Figure 3-18). There is no impairment of park resources with strategic fuels modification because projects that impact park resources are not permitted under the decision process for permitting projects.

### Education and Community Support

NPS community education and support programs promote fire safety and environmental protection and do not impair park resources.

### *Summary by Alternatives*

#### Impacts Common to All Alternative

Wildfire suppression impacts are common to all alternatives. Impacts from wildfire suppression are indistinguishable among alternatives.

Fuel modification impacts are common to all alternatives.

Benefits from education and community outreach are identical among all alternatives.

#### Alternative I – No-Action Alternative

Although never fully implemented, the landscape mosaic prescribed burn program of the 1994 *Fire Management Plan* (existing program) has the potential to impair resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of SMMNRA; (2) key to the natural or cultural integrity of the SMMNRA or to opportunities for enjoyment of the SMMNRA; or (3) identified as a goal in the SMMNRA's general management plan or other relevant NPS planning documents by impacting vegetation, wildlife, habitat connectivity, non-native species, soil, water resources/wetlands, air quality, special status plants and animals, cultural resources, paleontological resources, recreational and scenic resources.

### Alternative 2 – Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction

Because there will be no major adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of SMMNRA; (2) key to the natural or cultural integrity of the SMMNRA or to opportunities for enjoyment of the SMMNRA; or (3) identified as a goal in the SMMNRA's general management plan or other relevant NPS planning documents, Alternative 2 will not result in impairment of resources or values at SMMNRA.

### Alternative 3 – Ecological Prescribed Fire and Mechanical Fuel Reduction

Because there will be no major adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of SMMNRA; (2) key to the natural or cultural integrity of the SMMNRA or to opportunities for enjoyment of the SMMNRA; or (3) identified as a goal in the SMMNRA's general management plan or other relevant NPS planning documents, Alternative 3 will not result in impairment of resources or values at SMMNRA.

### Alternative 4 – Mechanical Fuel Reduction

Because there will be no major adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of SMMNRA; (2) key to the natural or cultural integrity of the SMMNRA or to opportunities for enjoyment of the SMMNRA; or (3) identified as a goal in the SMMNRA's general management plan or other relevant NPS planning documents, Alternative 4 will not result in impairment of resources or values at SMMNRA.

### Conclusions

There is no impairment of park resources under Alternative 2, 3, or 4. Alternative 1, the no action alternative, has the potential to impair park resources.

## **V Conclusions**

Alternative 2 is the environmentally preferred alternative. It provides the maximum potential environmental benefits and minimizes the adverse impacts of fire management actions.

Alternative 2 is the most flexible alternative, utilizing all available fire management strategies identified to be appropriate in the Santa Monica Mountains.

Alternative 1 is inappropriate and the most environmentally damaging alternative in the fire climate of the Santa Monica Mountains. Alternative 4 effectively addresses structure protection at the urban interface, but does not provide any of the ecological benefits from the ecological prescribed burning included in Alternatives 2 and 3. Alternative 2 is considered superior to Alternative 3 because it would not eliminate the potential benefits from strategic fuels reduction.

Although strategic fuels reduction has the potential for both impacts and benefits in most of the impact areas analyzed, individual strategic fuels reduction projects would be evaluated for their potential risk: benefit ratio according to the analytical procedure outlined in the discussion of fire hazard assessment (Figure 3-17).

## Chapter Five

# SUMMARY OF ENVIRONMENTAL CONSEQUENCES

This chapter synthesizes the detailed information provided in Chapter 4 and provides summary information “at-a-glance.” Table 5-1 rates the environmental consequences (or impacts) of each fire and fuels management alternative for each issue.

**Table 5-1 Summary of Environmental Consequences of Alternatives For Each Issue Detailed in Chapter 4**

Ratings for Alternatives 2, 3 and 4 are relative to Alternative 1 – No Action.

Issue	Alternative 1 (No Action) Current Program Mosaic Burning Mechanical Fuel Reduction	Alternative 2 Mechanical Fuel Reduction/Ecological Prescribed Fire/ Strategic Fuels Treatment	Alternative 3 Mechanical Fuel Reduction/ Ecological Prescribed Fire	Alternative 4 Mechanical Fuel Reduction	
<b>Vegetation</b>					
• Mosaic Burning	--				
• Mechanical Fuel Reduction	--	--	--	--	
• Ecological Prescribed Fire		++	++		
• Strategic Fuels Treatment		? / NEPA/NHPA			
• Suppression	+/-	+/-	+/-	+/-	
• Education	++	++	++	++	
<b>Wildlife</b>					
• Mosaic Burning	--				
• Mechanical Fuel Reduction	-	-	-	-	
• Ecological Prescribed Fire		++	++		
• Strategic Fuels Treatment		? / NEPA/NHPA			
• Suppression	+/-	+/	+/-	+/-	
• Education	++	++	++	++	
<b>KEY</b>					
++	mostly beneficial effects	+	some beneficial effects	0	no effects
-	some adverse effects	--	mostly adverse effects	?	unknown effect
+/-	both positive and negative effects				
NEPA/NHPA National Environmental Policy Act/National Historic Preservation Act review					

Issue	Alternative 1 (No Action) Current Program Mosaic Burning Mechanical Fuel Reduction	Alternative 2 Mechanical Fuel Reduction/Ecological Prescribed Fire/ Strategic Fuels Treatment	Alternative 3 Mechanical Fuel Reduction/ Ecological Prescribed Fire	Alternative 4 Mechanical Fuel Reduction
<b>Habitat Connectivity</b>				
• Mosaic Burning	--			
• Mechanical Fuel Reduction	-	-	-	-
• Ecological Prescribed Fire		0	0	
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	+/-	+/-	+/-	+/-
• Education	+	+	+	+
<b>Prevent Spread of Non-Native/Invasive Species</b>				
• Mosaic Burning	--			
• Mechanical Fuel Reduction	--	--	--	--
• Ecological Prescribed Fire		++	++	
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	+/- -	+/- -	+/- -	+/- -
• Education	+	+	+	+
<b>Special Status Species – Plants</b>				
• Mosaic Burning	- ? / EA			
• Mechanical Fuel Reduction	0	0	0	0
• Ecological Prescribed Fire		0	0	
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	0/ -	0/-	0/-	0/-
• Education	0	0	0	0

KEY			
++	mostly beneficial effects	+	some beneficial effects
-	some adverse effects	--	mostly adverse effects
+/-	both positive and negative effects	0	no effects
NEPA/NHPA	National Environmental Policy Act/National Historic Preservation Act review	?	unknown effect

Issue	Alternative 1 (No Action) Current Program Mosaic Burning Mechanical Fuel Reduction	Alternative 2 Mechanical Fuel Reduction/Ecological Prescribed Fire/ Strategic Fuels Treatment	Alternative 3 Mechanical Fuel Reduction/ Ecological Prescribed Fire	Alternative 4 Mechanical Fuel Reduction
<b>Special Status Species – Animals</b>				
• Mosaic Burning	+/- ? / NEPA/NHPA			
• Mechanical Fuel Reduction	0	0	0	0
• Ecological Prescribed Fire		0	0	
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	+/-	+/-	+/-	+/-
• Education	0	0	0	0
<b>Soil</b>				
• Mosaic Burning	--			
• Mechanical Fuel Reduction	-	-	-	-
• Ecological Prescribed Fire		0	0	
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	+/-	+/-	+/-	+/-
• Education	+	+	+	+
<b>Water Resources / Wetlands</b>				
• Mosaic Burning	--			
• Mechanical Fuel Reduction	0	0	0	0
• Ecological Prescribed Fire		0	0	
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	+/-	+/-	+/-	+/-
• Education	+	+	+	+

KEY			
++	mostly beneficial effects	+	some beneficial effects
-	some adverse effects	--	mostly adverse effects
+/-	both positive and negative effects	0	no effects
NEPA/NHPA	National Environmental Policy Act/National Historic Preservation Act review	?	unknown effect

Issue	Alternative 1 (No Action) Current Program Mosaic Burning Mechanical Fuel Reduction	Alternative 2 Mechanical Fuel Reduction/Ecological Prescribed Fire/ Strategic Fuels Treatment	Alternative 3 Mechanical Fuel Reduction Ecological/ Prescribed Fire	Alternative 4 Mechanical Fuel Reduction
<b>Coastal Resources</b>				
• Mosaic Burning	- ?			
• Mechanical Fuel Reduction	0	0	0	0
• Ecological Prescribed Fire		0	0	
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	+ ?	+ ?	+ ?	+ ?
• Education	0	0	0	0
<b>Paleontological Resources</b>				
• Mosaic Burning	-			
• Mechanical Fuel Reduction	0	0	0	0
• Ecological Prescribed Fire	0	0	0	0
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	-	-	-	-
• Education	0	0	0	0
<b>Air Quality</b>				
• Mosaic Burning	--			
• Mechanical Fuel Reduction	0	0	0	0
• Ecological Prescribed Fire		-		
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	++	++	++	++
• Education	+	+	+	+

KEY			
++	mostly beneficial effects	+	some beneficial effects
-	some adverse effects	--	mostly adverse effects
+/-	both positive and negative effects	0	no effects
NEPA/NHPA	National Environmental Policy Act/National Historic Preservation Act review	?	unknown effect

Issue	Alternative 1 (No Action) Current Program Mosaic Burning Mechanical Fuel Reduction	Alternative 2 Mechanical Fuel Reduction/Ecological Prescribed Fire/ Strategic Fuels Treatment	Alternative 3 Mechanical Fuel Reduction/ Ecological Prescribed Fire	Alternative 4 Mechanical Fuel Reduction
<b>Cultural/Historic</b>				
• Mosaic Burning	–			
• Mechanical Fuel Reduction	0	0	0	0
• Ecological Prescribed Fire		0	0	
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	--	--	--	--
• Education	0	0	0	0
<b>Land Use</b>				
• Mosaic Burning	0			
• Mechanical Fuel Reduction	0	0	0	0
• Ecological Prescribed Fire		0	0	
• Strategic Fuels Treatment		–		
• Suppression	--	--	--	--
• Education	+	+	+	+
<b>Recreation / Scenic Resource</b>				
• Mosaic Burning	--			
• Mechanical Fuel Reduction	–	–	–	–
• Ecological Prescribed Fire		–	–	–
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	+/-	+/-	+/-	+/-
• Education	+	+	+	+

KEY			
++	mostly beneficial effects	+	some beneficial effects
–	some adverse effects	--	mostly adverse effects
+/-	both positive and negative effects	0	no effects
NEPA/NHPA	National Environmental Policy Act/National Historic Preservation Act review	?	unknown effect

Issue	Alternative 1 (No Action) Current Program Mosaic Burning Mechanical Fuel Reduction	Alternative 2 Mechanical Fuel Reduction/Ecological Prescribed Fire/ Strategic Fuels Treatment	Alternative 3 Mechanical Fuel Reduction /Ecological Prescribed Fire	Alternative 4 Mechanical Fuel Reduction
<b>Maximize Health/Safety</b>				
• Mosaic Burning	0			
• Mechanical Fuel Reduction	++	++	++	++
• Ecological Prescribed Fire		0	0	
• Strategic Fuels Treatment		++ ? / NEPA/NHPA		
• Suppression	++	++	++	++
• Education	++	++	++	++
<b>Reduce Risk Of Catastrophic Events</b>				
• Mosaic Burning	0			
• Mechanical Fuel Reduction	0	0	0	0
• Ecological Prescribed Fire		0	0	
• Strategic Fuels Treatment		++ ? / NEPA/NHPA		
• Suppression	++	++	++	++
• Education	+	+	+	+
<b>Cumulative Impacts</b>				
• Mosaic Burning	--			
• Mechanical Fuel Reduction	-	-	-	-
• Ecological Prescribed Fire		+	+	
• Strategic Fuels Treatment		? / NEPA/NHPA		
• Suppression	+	+	+	+
• Education	++	++	++	++

KEY			
++	mostly beneficial effects	+	some beneficial effects
-	some adverse effects	--	mostly adverse effects
+/-	both positive and negative effects	0	no effects
NEPA/NHPA	National Environmental Policy Act/National Historic Preservation Act review	?	unknown effect

## Chapter Six

# CONSULTATION AND COORDINATION

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## I Interagency and Public Scoping

Agencies, cooperators, and other partners had several opportunities to raise issues of concern at the early stages in developing the environmental impact statement. Shortly thereafter, the public was invited to participate with their comments and ideas (attendees are listed in Appendix D).

- A fire management planning workshop was held in June, 2001, for agencies, cooperators, and other partners. Following the workshop, a newsletter describing the planning effort and issues already raised was released to the workshop participants and other interested parties in December, 2001. All newsletter recipients were invited to submit additional written comments for consideration.
- A Notice of Intent was published in the Federal Register in February, 2002 announcing that SMMNRA was updating its *Fire Management Plan*, and encouraging public participation through public meetings and written comment within a six month period.
- Four public meetings were announced and publicized through media announcements and public invitations in late April/early May, 2002. The meetings were held in Beverly Hills, Calabasas, Malibu, and Thousand Oaks, California. Participants were provided with background and information on four alternatives, and asked to submit their comments in writing, if possible, to ensure accuracy.
- Two additional meetings in June, 2002 to gain additional input on these four alternatives from fire agencies, cooperators, and other partners. Their written comments were also solicited.
- Fifteen invitations were sent to citizens with Native American affiliations, requesting their comments and concerns that the four alternatives may have on cultural activities, practices or resources.
- A public comment period was announced on June 16, 2004 through the *Federal Register*. the public was invited to review the *Draft SMMNRA Fire Management Plan/EIS* and submit written comments by September 15, 2004.
- Eighty copies of the *Draft SMMNRA Fire Management Plan/EIS* were sent to libraries in Los Angeles and Ventura counties in July, 2004.
- A press release along with over 300 individual letters was issued in mid-July, 2004, announcing the opportunity for the public to obtain information and ask questions at

four public meetings in August, 2004. This information was posted on the SMMNRA website and was carried by numerous media outlets. The public was invited to call or write the SMMNRA for a copy of the *Draft SMMNRA Fire Management Plan/EIS*.

Some issues raised are of significant and widespread interest, while others were duplicate or peripheral to the formation of this document. Issues raised at the June, 2001 workshop and analyzed within the environmental assessment include:

- 1) Firefighter and public safety including identification of underground power lines, homeowner education about responsibility for fire safety, and identification of high-risk areas using GIS tools and fire models.
- 2) Fuels treatment at the wildland urban interface to optimize effectiveness of property protection and minimize impacts.
- 3) Operational and policy co-ordination among all the agencies within the Santa Monica Mountains National Recreation Area (SMMNRA) including consistent brush clearance policies and uniform emergency plans for all the agencies.
- 4) The impact of fire management activities including suppression actions and promotion of the spread of invasive plants and animals.
- 5) The use of prescribed fire for restoration activities.
- 6) Appropriate land use planning.

## II Cultural Resources and Native American Consultation

The National Park Service was invited to present the EIS alternatives and other issues for comment to the Chumash Elders Council in August, 2002. Although they did not respond formally, they expressed concerns with the effects of both natural and prescribed fire on cultural resources. They asked to be kept informed of our fire prescription and management activities. They emphasized that they are not just concerned about what we refer to as cultural resources but are just as concerned with what we refer to as natural resources because they look on all resources as being important to their culture.

Consultations will continue with the Elders Council at Santa Ynez (the only federally recognized entity), as well as with local Chumash and Tongva/Gabrielino groups and individuals. The SMMNRA's cultural anthropologist will coordinate and document these consultations. Other stakeholders, such as homesteaders and pioneers, will also be consulted.

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# Chapter Seven

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# APPENDICES

## Appendix A Fuel Modification Policy Examples – State of California Department of Parks and Recreation

State of California - The Resources Agency DEPARTMENT OF PARKS AND RECREATION		MANUAL
<b>DEPARTMENTAL NOTICE</b> No. 2002-4		Operations
SUBJECT		CHAPTER
Fuel Modification Policy		1100 Visitor Safety
ISSUED	EXPIRES	REFERENCE
February 27, 2002	When Incorporated	DOM 1105.6

DPR 375 (Rev. 10/2001)(Word 10/10/2001)

**WHEN APPLICABLE, ENTER THE NUMBER AND DATE OF THIS DEPARTMENTAL NOTICE IN THE MARGIN OF THE MANUAL PAGE, ADJACENT TO THE SECTION(S) AFFECTED BY IT.**

The last paragraph in Department Operations Manual Section 1105.6 Fuel Modification Policy states: "The Department shall actively participate in the local land use decision process to prevent conflicts with this policy." The attached form letter template (DPR 181) clarifies the Department's position on new residential and commercial development along park boundaries. This template, customized for your locale, shall be used to respond to proposals to construct new buildings or to modify existing buildings adjacent to wildland park properties. The template text can also be used to respond to CEQA projects and Coastal Permits.

### BACKGROUND

Throughout the history of the Department, wildland properties have been acquired in order to protect the natural, cultural, and scenic features for the people of California. Many of these native ecosystems contain plants that can become flammable under specific environmental conditions of high wind, high temperature and low humidity. These ecosystems inevitably burn either from natural or human causes. Buildings constructed in the Urban-Wildland Interface (U-WI) Zone are at risk from wildland fires. There are three principal causes of ignition of structures in the U-WI Zone.

The first cause is aerial flaming brands that land directly on ignitable surfaces of the structure. These brands can originate from wildfires over ½ mile away from the structure. Buildings that are constructed to strict codes of ignition resistive materials are at very low risk of ignition from flaming brands.

The second cause also involves aerial flaming brands. Brands land on accumulations of ignitable materials on, under, or next to the structure, which, in turn, ignite decking or enter attics through soffit vents. This threat can be eliminated by removing organic debris that has accumulated on or under the building and clearing the vegetation that is within 30 feet of the building.

The third cause is severe radiant/connective heat of burning material near to the structure which can either: a) ignite the sides of the building, b) break the windows allowing burning embers into the interior of the building, or c) ignite the interior furnishings through the windows. Fire modeling, analysis of past U-WI Zone fires, and experiments to determine the ignitability of structure have confirmed that even the radiant/connective heat of extreme flaming fronts pose low risk to any structure which is 130 feet or more distant, especially if that structure conforms to strict interface fire codes of ignitability, and window strength and reflectivity.

## SITUATION

Private individuals and public fire protection agencies routinely request/demand that Department field staff clear native vegetation on Department wildlands in order to:

- 1) reduce the threat of wildfire to private property
- 2) reduce fire insurance costs to private land owners
- 3) comply with strict local ordinances, and
- 4) mitigate the Department's liability for maintaining a dangerous condition.

Occasionally property owner's trespass/encroach onto Department lands to clear vegetation.

In many of these scenarios, either the private structure is not constructed to ignition resistant standards, or the vegetation/organic debris next to and on the building is not cleared according to code requirements, or the building is setback an insufficient distance from park property. In some cases all three risk factors are present.

Functioning native ecosystems can be significantly degraded by removing vegetation, through increased soil erosion, increased opportunities for the establishment of exotic species, and wildlife habitat degradation. Unfortunately, vegetation clearing on Department wildlands does little to reduce the risk of structural ignition if the structure itself is inadequately designed and located or the vegetation or debris immediately next to the structure is highly flammable.

Please contact Stephen Bakken (916-654-9934) for questions about the use of the DPR 181.



Dick Troy  
Deputy Director  
Park Operations



(District Address and Phone No.)

(Date)

(Addressee's Name and Address)

(Dear Mr. or Ms. \_\_\_\_\_, or To Whom It May Concern):

It has come to our attention from (permitting agency's agenda) that you have applied to (build or permit) the (residential or commercial) structures proposed for (name of proposed development) which is intended to be installed adjacent to (park unit name). We note if you are not already aware, that these structures will be placed in the urban-wildland interface zone, which can experience wildland fires. We wish to emphasize the importance of careful attention to the design and location of these structures with respect to protection from wildland fires.

We direct you to the Class 1 Ignition-Resistant Construction specifications of the Urban-Wildland Interface Code (International Fire Code Institute, 2000<sup>1</sup>). This model code includes Class A roofing, ignition-resistive siding, decking and other attachments, tempered or glazed/multi-pane windows, and protective measures for eaves, attics and overhangs.

In addition to the steps contained in the model code that you should take to protect your property from fire, a minimum setback between the habitable structure and the state parks property boundary should be established equal to: A) the municipal ordinance for vegetation clearance, (appropriate municipal or county code), or B) 130 horizontal feet (Source: Cohen, 2000<sup>2</sup>), whichever is greater.

<sup>1</sup> International Fire Code Institute. 2000 ISBN 1-58001-028-8 Urban-Wildland Interface Code. Whittier, California, USA. 49 pp.  
Library reference # = ISBN 1-58001-028-8 ;  
Internet: <http://www.icbo.org/>, search for Product # UWIS2K.

<sup>2</sup> Cohen, Jack D. 2000. Preventing Disaster - Home Ignitability in the Wildland-Urban Interface. *Journal of Forestry*, 98(3):15-21.

(Mr. or Ms. \_\_\_\_\_)  
(Date)  
Page Two

If you have questions or desire additional information about these important steps you can and should take to protect your property, you may contact the (name of local Fire Protection Agency) at (local Fire Agency's phone no.).

Sincerely,

(District Superintendent's Name)  
District Superintendent  
(District Name)

cc: (Permitting Agency)  
(Local Fire Agency)  
Department Forester, Field Services Division

*Assessor's Parcel Number(s):*

## Appendix B      Direct, Operational and Indirect Fire Effects on Cultural Resources at Santa Monica Mountains National Recreation Area

### *Direct Effects*

Direct effects are probably the most misunderstood of the fire impacts. This is due to the fact that our knowledge of the effects of fire on stone, metal, bone, wood and other common materials is not yet satisfactory. The more severe the fire behavior, the greater the potential for adverse impacts to cultural resources. Damage to cultural resources from the direct effects of fire include alteration or destruction of artifacts, features, structures, vegetation, and other elements as a result of heat and/or smoke.

Not all materials comprising cultural resources are equally susceptible to the effects of fire. For example, wood is typically damaged at much lower temperatures than metal or stone. This holds true even within single material classes; for example, while a flaked stone artifact might not break unless exposed to very high temperatures, the same artifact will change color at a much lower temperature, impairing the ability of an archeologist to make a proper identification as to its source. A brief description of what is known of the effects of fire on the materials that commonly comprise the archeological resources of the Santa Monica Mountains is presented below.

### Flaked Stone

Flaked stone artifacts occur on many prehistoric archeological sites in the Santa Monica Mountains, most often in the form of tools such as projectile points and scrapers, as well as waste material like expended cores and debitage. Common raw materials comprising flaked stone artifacts from the Santa Monica Mountains include cryptocrystalline silicates such as chert and chalcedony, obsidian, various igneous rocks (granite, basalt, andesite, tuff), fused shale, quartzite, and various others (King, 2000).

Experiments have demonstrated that flaked stone artifacts are vulnerable to structural modifications such as breakage, melting, discoloring, and weight loss as a result of heat from fire (Deal, 2001). The vulnerability of a given flaked stone artifact relates to the material from which it is made. For example, cryptocrystalline silicates have been documented to crack, spall, and shatter at 350° C. While not common in archeological sites of the Santa Monica Mountains, obsidian artifacts have the potential benefit of dating through measurement of the obsidian hydration rind. Studies have demonstrated that hydration rinds are subject to elimination or distortion when exposed to temperatures above 100 to 200° C. It is well documented that certain raw materials, cryptocrystalline silicates in particular, were heated prior to working to improve flaking qualities. Physical changes to the raw materials such as color changes and spalling resulting from such heat treatments can also occur during modern fires.

## Ground and Battered Stone

Ground and battered stone artifacts also occur with some frequency on Native American Indian archeological sites. Most are constructed from the larger-grained stones mentioned above, such as granite, basalt, andesite, quartzite and sandstone (King, 2000). Common artifact types include millings, handstones, mortars, pestles, hammerstones, ornaments, and battered cobbles. Additionally, steatite quarried from Santa Catalina Island and interior California appears in the Santa Monica Mountains as cooking vessels, and bedrock mortars occur on a few bedrock outcrops.

Few data are available on the effects of fire on groundstone artifacts (Deal, 2001). Artifacts observed after low intensity fires tend to have minimal surface defects, while those that undergo high severity heating often exhibit breakage, cracking, oxidation, sooting, and adhesions. Again, the degree of damage appears to correlate with the raw material, with harder volcanic rocks being more durable than sandstone and quartzite.

## Shell

Marine shell can occur in Native American (e.g., beads and ornaments, faunal remains) and historical (buttons, faunal remains) archeological contexts in the Santa Monica Mountains (King, 2000). Shell fragments often occur as components of residential middens, while shell beads, ornaments, and clothing fasteners are found in the remains of structures, middens, trash scatters, and associated with human burials.

Waselkov (1987) suggested that shell heated to a high temperature will begin to deteriorate as released calcium oxide mixes with sodium bicarbonate solution found in the soil. Seabloom et al. (1991) found that shell exposed on the surface during a grass fire fractured or disintegrated. Haecker (2000) exposed a shell button and whole oyster shell to relatively low (ca. 245° C) and high (ca. 815° C) intensity fires. In the first, the shell button discolored and the oyster shell remained unchanged, while in the second, the shell button had completely disintegrated, and the oyster shell discolored slightly.

It is important to note that shell beads and ornaments were sometimes intentionally heated or burned in anticipation of manufacture and/or prior to deposition. These may exhibit color and/or physical changes that reflect both cultural behavior, as well as greater vulnerability to subsequent heat exposure.

## Bone

Archeological bone specimens occur in the form of food remains, formed tools and human remains in the Santa Monica Mountains (King 2000). These are most likely to be found on the surface of, or buried in, middens and structures of village sites.

Various forms of damage (water loss, charring, chemical alterations) have been documented on bone in laboratory experiments between temperatures of 100 and 1000° C (Bennett and

Kunzmann, 1985; Nicholson, 1993; Bennett, 1999). Experiments performed by Stiner et al. (1995) demonstrated that burned bones are more fragile and brittle than unburned specimens, and that mechanical strength is negatively correlated with the extent and intensity of burning. Bone fragmentation was particularly acute in burned specimens subjected to post-burn trampling. Again, archeological bone was often heated in the context of meal preparation and other activities.

### Rock Imagery

Spectacular examples of rock imagery sites occur in the Santa Monica Mountains (King, 2000). Kelly and McCarthy (2001:170) noted that rock imagery panels are highly vulnerable to direct fire impacts including discoloration, soot smudging, rock face spalling, and heat penetration that alters organic binder materials of pictographic elements. Extreme examples of damage have been documented in conjunction with low humidity, heavy fuel loads, hot and dry weather, and erratic winds.

### Archaeobotanical Remains

Archaeobotanical remains such as pollen, macrofloral remains and phytoliths are common components of archeological deposits in the Santa Monica Mountains (King 2000). In addition to traditional archeological site context, King (2000) has suggested that Archaeobotanical remains are likely found in ancient soils, and hold a key to determining past vegetation patterns and reconstructing Native American resource procurement patterns.

Fire effects on pollen are not well understood. Scott (1990) suggested that surface pollen was destroyed by moderately high intensity fire behavior, while subsurface pollen was relatively unaffected. Fish (1990), however, found that surface pollen, although physically altered, was still readily identifiable following a wildfire. The effects of fire on phytoliths is unknown.

Unless found in unique depositional contexts (e.g., caves and rockshelters), macrofloral remains such as seed and bulb fragments are unlikely to be preserved in archeological contexts unless carbonized (Micsicek, 1987). Complete carbonization of plant materials occurs between temperatures of 250 to 500° C in low oxygen conditions. Carbonized plant remains are very resistant to further organic decay, often succumbing to nothing less than mechanical damage. Accordingly, Ford (1990) noted no apparent damage to botanical remains recovered from shallow fire hearths in sites burned during a wildfire. Other Archaeobotanical studies where the distinction between modern and archeological charcoal was far less apparent. This phenomenon could be of concern with regard to the contamination of archeological features with modern carbon.

### Organic Residues

Organic residues that adhere to, or are absorbed by, artifacts, ecofacts, or features are the subjects of increasing sophisticated lines of inquiry (Heron and Evershed, 1993; Orna, 1996). Among the residues commonly studied include lipids, proteins, carbohydrates, and other biopolymers. Artifacts from the Santa Monica Mountains almost certainly retain some of these signatures.

Heron and Evershed (1993) noted that certain residues are prone to elimination through pre- or post-depositional disturbance, including heating, although that aspect is poorly understood in archeological contexts. More recently, controlled experiments have yielded useful information. For example, based on an analysis of cooking pot residues, Malainey et al. (1999) found that fatty acid composition of plant and animal foods changed dramatically with thermal and oxidative degradation, rendering accurate interpretations difficult. Still, Newman (1995) reported positive immunological reactions on flaked stone artifacts recovered from sites in an area subjected to a high intensity wildfire.

### Vegetation

Vegetation with cultural significance occurs in association with prehistoric and historical archeological resources, ethnographic resources, structures, and cultural landscapes. King (2000) suggested that the distribution of certain native plant species, such as oaks, hollyleaf cherry, and yucca, is, in part, reflective of previous native resource management techniques, and that their distribution should be mapped. Non-native species, such as ornamental trees and shrubs, often occur in association with historical structures and cultural landscapes within the Santa Monica Mountains.

### Historical Materials

A variety of historical artifacts and features, including glass, metal, wood, ceramic, brick, cement, cinder block, leather, rubber, and plastic, are known or suspected to occur on historical archeological sites, structures, and cultural landscapes within the Santa Monica Mountains. These materials vary widely in their susceptibility to direct fire effects.

Heat build-up, smoke, and flames can all impact glass artifacts and fragments (Haecker, 2000:7-9). Soda lime glass, commonly used for containers, windows, pressed and brown-ware and lighting products, has a melting temperature of about 540° C, while lead glasses melt at 420° C. Crazing, or cracking of glass into smaller, irregular segments, is a common impact associated with exposure to heat, though the degree of effects is related to the type and thickness of the glass, temperature, and distance from the point of origin.

Haecker (2000:10-12) noted that certain metals may actually melt prior to reaching their melting points (Table 8-1) through the process of alloying where a metal with a lower melting point drips onto one with a higher melting temperature, the resulting reaction lowering the melting temperature of the latter. Metal artifacts that do not melt may warp out of shape under certain conditions.

Table B-I Melting Points of Metal Materials Commonly Found on Historical Archeological Sites

I– II Material	Temperature (°C)	III Artifacts
Aluminum	660	Kitchenwares
Brass (yellow)	932	Cartridge cases, military buttons and insignia
Cast iron	1,350 to 1,400	Kettles, Dutch ovens, wood stoves
Copper	1,082	Kitchenwares, building materials, coins
Gold	1,063	Coins, jewelry
Iron	1,540	Tools, nails, horseshoes, cans, corrugated roofing
Lead	327	Bullets
Nickel	1,455	Plating
Pot metal	300 to 400	Flatware, pots, faucets
Silver	960	Coins, jewelry
Solder (tin)	135 to 177	Patch repair on brass and iron objects
Steel (stainless)	1,427	Eating utensils, kitchenwares
Steel (carbon)	1,516	Heavy machinery parts
Tin	232	Kitchenwares, toys, building materials
White pot metal	300 to 400	Kitchenwares
Zinc	375	Plating for iron objects

*Adapted from Haecker (2000:10-11).*

Haecker (2000) noted that many historical metal artifacts and features have previously been subjected to the effects of fire through trash burning, structure fires, etc. While many of these were probably not of sufficient temperature to adversely damage metal artifacts, certain components (e.g., lead solder in cans) may have melted, causing a loss of structural integrity and hastening disintegration. Likewise enamel and plating (such as tin, brass and silver) can burn or spall off, exposing the underlying metal to oxidation. Even heavy-duty metals, such as iron and steel, are subject to pitting and other surface damage that can result in long-term attrition.

Potential direct fire effects on historical ceramics are dictated by the characteristics of the paste, glaze, painted decorations, as well as the temperature to which the artifact is exposed (Haecker, 2000). Refined (i.e., glazed) earthenwares (e.g., ironstone, hotel wares) will crack and become discolored at even relatively low temperatures. Porcelains have a melting temperature of about 1550° C, although overglaze paint decorations and makers marks can become discolored and/or eliminated, thereby potentially compromising the ability to accurately identify and/or date the artifact.

Haecker (2000) noted that the rate of wood charring, the carbonization of a fuel by heat or burn-

ing, varies widely depending on a number of factors. Typically, a section of dimensional lumber will ignite at about 350° C. Haecker (2000) further noted that wood occurring in historical archeological contexts is particularly susceptible to even low-intensity burning because it is often highly decomposed due to weathering and located in close proximity to other highly flammable materials (e.g., thick vegetation, accelerants).

Haecker (2000) suggested that porous firebrick is highly susceptible to fire, and that cinder block, certain masonry surfaces, and cement mortar could spall when exposed to fire. Experimental heating performed on gypsum plaster, fire brick, and cement mortar revealed varying effects depending on fire temperature. At about 245° C, the firebrick and cement mortar were unchanged, and the gypsum plaster was discolored and friable. The firebrick discolored and broke, gypsum plaster became even more friable, and the cement mortar discolored at temperatures exceeding 650° C.

Rubber and rubberized artifacts are completely consumed in low intensity fires, while plastics melt between 75 and 265° C (Haecker, 2000). With age, leather objects dry and become brittle and will char in a low intensity fire and be consumed at higher temperatures.

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## Appendix C Guidelines for Fire Suppression Activities in Sensitive Resource Areas

- 1) Information concerning the known location(s) of Threatened and Endangered (T&E) species habitat, T&E species, riparian habitat, woodland habitat, and any other sensitive habitat areas will be made available for use by resource advisors, line officers, incident commanders, the planning section, other agency representatives and will be included in the Wildland Fire Situation Analysis (WFSA).
- 2) Fire suppression activities will incorporate strategies and tactics to provide protection of sensitive areas, to the maximum extent feasible, while still maintaining firefighter safety and protecting life, property and natural or cultural resources, commensurate with resource value.
- 3) The following tactical guidelines are recommended for sensitive resource areas:
  - Direct the use of fire retardant and Class A foam to avoid riparian areas. Do not apply Class A foam to any live water course.
  - Consider the life cycle and habitat requirements of T&E species when developing suppression strategies and tactics in riparian areas. This may include water drops, mop-up, and selection of water sites.
  - Avoid construction of dozer lines and hand lines within riparian zones or other sensitive habitat areas whenever possible. Construct handlines along the outside perimeter of riparian or other sensitive zones. Handlines will be used to connect firelines crossing riparian areas where feasible. When dozer lines must be constructed, Minimum Impact Suppression Tactics (MIST) will be used, including raising the blade and walking dozers across riparian and aquatic areas. Firelines should cross streams at right angles to the stream course. Install erosion control measures to protect riparian zones.
  - Inform air and ground operations section personnel on locations and types of T&E species, habitats, the requirements of the Endangered Species Act, and penalties associated with violating the Act.
  - Avoid “burning out” or backfires within riparian zones when possible. Consult the Resource Advisor during planning sessions regarding strategies and tactics.
  - Avoid or minimize concentration of people and equipment such as staging areas, helibases, helispots, base camps and drop points in or adjacent to riparian or other sensitive areas.
  - Avoid opportunities for the introduction of exotic or invasive weeds by removing dirt and seeds from firefighting equipment prior to use in wildfire suppression and rehabilitation.

- 4) In addition, the following Minimum Impact Suppression Guidelines should be implemented.

### ***Minimum Impact Tactics Guidelines (RMI 8, Ch. 9, Exhibit 5)***

The change from FIRE CONTROL to FIRE MANAGEMENT has added a new perspective to the role of fire manager and the firefighter. The objective of putting the fire “dead-out” by a certain time has been replaced by the need to make unique decisions with each fire start, to consider the land and resource objectives, and to decide the appropriate management response and tactics which result in minimum costs and resource damage.

Traditional thinking, “the only safe fire is a fire without a trace of smoke” is no longer valid. Fire Management now means managing fire “with time” as opposed to “against time.” This change in thinking and way of doing business involves not just the firefighter, but all levels of management as well.

National Park Service (NPS) fire management requires the fire manager and firefighter to select management tactics commensurate with the fire's potential or existing behavior, yet leaves minimal environmental impact.

The intent of this guide is to serve as a checklist for the Incident Command and Planning Section Chief, Operations Section Chief, Logistics Section Chief, Division/Group Supervisors, Strike Team/Task Force Leaders, Single Resource Bosses, and firefighters. Accomplishments of minimum impact fire management techniques originates with instructions that are understandable, stated in measurable terms, and communicated both verbally and in writing. Evaluation of these tactics both during and after implementation will further the understanding and achievement of good land stewardship ethics during fire management activities.

### ***Agency Administrator/Incident Management Team/Firefighter Considerations For Minimum Impact Management***

The following guidelines are for park superintendents, incident management teams and firefighters to consider. Some or all of these items may apply, depending upon the situation. Consider:

#### **Command and General Staff**

- 1) Evaluate each and every suppression tactic during planning and strategy sessions to see that they meet superintendent’s objectives and minimum impact management guidelines. Include agency resource advisor and/or local representative in above session.
- 2) Discuss minimum impact management techniques with overhead during overhead briefings, to gain full understanding of tactics.
- 3) Ensure minimum impact management techniques are implemented during line construction as well as other resource disturbing activities.

### **Planning Section**

- 1) Use resource advisor to evaluate that management tactics are commensurate with land/resource objectives, and incident objectives.
- 2) Use an assessment team to get a different perspective of the situation.
- 3) Use additional consultation from “publics” or someone outside the agency, especially if the fire has been or is expected to be burning for an extended period of time.
- 4) Adjust line production rates to reflect the minimum impact management tactics.
- 5) Use brush blade for line building — when dozer line is determined necessary tactics
- 6) Leave some trees randomly in fireline.
- 7) Ensure that instructions for minimum impact management techniques are listed in the incident action plan.
- 8) Detail objectives for extent of mop-up necessary — for instance: “ \_\_\_\_\_ distance within perimeter boundary.”
- 9) If helicopters are involved, use long line remote hook in lieu of helispots to deliver/retrieve gear.
- 10) Anticipate fire behavior and ensure all instructions can be implemented safely.
- 11) Consider coyote camps versus fixed campsite in sensitive areas.
- 12) In extremely sensitive area, consider use of portable facilities (heat/cook units, latrines).

### **Operations Section**

- 1) Emphasize minimum impact management techniques during each operational period briefing. Explain expectations for instructions listed in incident action plan.
- 2) Consider showing minimum impact management slide-tape program or video to the crews upon arrival at airport/incident
- 3) Consider judicious use of helicopters--consider long lining instead of helispot construction.
- 4) Use natural openings so far as practical.
- 5) Consider use of helibucket and water/foam before call for air tanker/retardant.
- 6) Monitor suppression tactics/conditions.
- 7) Distribute field guide to appropriate supervisory operations personnel.

### **Logistics Section**

Ensure actions performed around areas other than Incident Base, i.e. dump sites, camps, staging areas, helibases, etc., result in minimum impact upon the environment.

### **Division/Group Supervisor and Strike Team/Task Force Leader**

- 1) Ensure crew superintendents and single resource bosses understand what is expected.
- 2) Discuss minimum impact tactics with crew.
- 3) Ensure dozer and falling bosses understand what is expected.
- 4) If helicopters are involved, use natural openings as much as possible; minimize cutting only to allow safe operations.
- 5) Avoid construction of landing areas in high visitor use areas.
- 6) Monitor suppression tactics/conditions.

### **Crew Superintendents**

- 1) Ensure/Monitor results expected.
- 2) Discuss minimum impact management techniques with crew.
- 3) Provide feedback on implementation of tactics — were they successful in halting fire spread; what revisions are necessary?
- 4) Look for opportunities to further minimize impact to land and resources during the suppression and mop-up phase

### ***Implementation Guidelines***

Minimum impact management is an increased emphasis to do the job of suppressing a wildland fire while maintaining a high standard of caring for the land. Actual fire conditions and your good judgement will dictate the actions you take. Consider what is necessary to halt fire spread and ensure it is contained within the fireline or designated perimeter boundary.

### **Safety**

- 1) Safety is of utmost importance.
- 2) Constantly review and apply the 18 Situations that Shout Watchout and 10 Standard Fire Orders.
- 3) Be particularly cautious with:
  - Burning snags you allow to burn down.
  - Burning or partially burning live and dead trees.
  - Unburned fuel between you and the fire.
  - Identify hazard trees with either an observer flagging and/or glow-sticks.
  - Be constantly aware of the surroundings, of expected fire behavior, and possible fire perimeter one or two days hence.

## **Fire Lining Phase**

- 1) Select procedures, tools, and equipment that least impact the environment.
- 2) Give serious consideration to use of water as a firelining tactic (fireline constructed with nozzle pressure, wetlining).
- 3) In light fuels, consider:
  - a. Cold trail line.
  - b. Allow fire to burn to natural barrier.
  - c. Consider burn out and use of “gunny” sack or swatter.
  - d. Constantly re-check cold-trailed fireline.
  - e. If constructed fireline is necessary, use minimum width and depth to check fire spread.
- 4) In medium/heavy fuels, consider:
  - a. Use of natural barriers and cold trailing.
  - b. Cooling with dirt and water, and cold-trailing.
  - c. If constructed fireline is necessary, use minimum width and depth to check fire spread.
  - d. Minimize bucking to establish fireline; preferably build line around logs.
- 5) Aerial fuels — brush, trees, and snags:
  - a. Adjacent to fireline; limb only enough to prevent additional fire spread.
  - b. Inside fireline; remove or limb only those fuels which if ignited would have potential to spread fire outside the fireline.
  - c. Brush or small trees that are necessary to cut during fireline construction will be cut flush with the ground.
- 6) Trees, burned trees, and snags:
  - a. MINIMIZE cutting of trees, burned trees, and snags.
  - b. Live trees will not be cut; unless determined they will cause fire spread across the fireline or seriously endangers workers. If tree cutting occurs cut stumps flush with the ground.
  - c. Scrape around tree bases near fireline if hot and likely to cause fire spread.
  - d. Identify hazard trees with either an observer, flagging and/or glow sticks.
- 7) When using indirect attack:

- a. Do not fall snags on the intended unburned side of the constructed fireline, unless they are an obvious safety hazard to crews working in the vicinity.
- b. On the intended burnout side of the line, fall only those snags that would reach the fireline should they burn and fall over. Consider alternative means to falling, i.e. fireline explosives, bucket drops.

### **Mop-up Phase**

- 1) Consider using “hot-spot” detection devices along perimeter (aerial or hand-held).
- 2) Light fuels:
  - a. Cold-trail areas adjacent to unburned fuels.
  - b. Do minimal spading; restrict spading to hot areas near fireline only.
- 3) Medium and heavy fuels:
  - a. Cold-trail charred logs near fireline; do minimal scraping or tool scaring.
  - b. Minimize bucking of logs to check for hot spots or extinguish fire; preferably roll the logs.
  - c. Return logs to original position after checking or ground is cool.
  - d. Refrain from making bone-yards; burned/partially burned fuels that were moved would be arranged in natural position as much as possible.
  - e. Consider allowing larger logs near the fireline to burnout instead of bucking into manageable lengths. Use lever, etc. to move large logs.
- 4) Aerial fuels – brush, small trees and limbs; remove or limb only those fuels which if ignited have potential to spread fire outside the fireline.
- 5) Burning trees and snags:
  - a. First consideration is allow burning tree/snag to burn themselves out or down (Ensure adequate safety measures are communicated).
  - b. Identify hazard trees with either an observer, flagging, and/or glow-sticks.
  - c. If burning trees/snag pose serious threat of spreading firebrands, extinguish fire with water or dirt. FELLING by chainsaw will be last means.
  - d. Consider falling by blasting, if available.

### **Camp Sites and Personal Conduct**

- 1) Use existing campsites if available.
- 2) If existing campsites are not available, select campsites that are unlikely to be observed by visitors/users.

- 3) Select impact-resistant sites such as rocky or sandy soil, or opening within heavy timber. Avoid camping in meadows, along streams or lakeshores.
- 4) Change camp location if ground vegetation in and around the camp shows signs of excessive use.
- 5) Do minimal disturbances to land in preparing bedding and campfire sites. Do not clear vegetation or do trenching to create bedding sites.
- 6) Toilet sites should be located in minimum of 200n feet from water sources. Holes should be dug 6-8 inches deep.
- 7) Select alternate travel routes between camp and fire if trail becomes excessive.
- 8) Evaluate coyote camps versus fixed campsites in sensitive areas.

### **Restoration of Fire Suppression Activities**

- 1) Firelines:
  - a. After fire spread is secured, fill in deep and wide firelines, and cut trenches.
  - b. Waterbar, as necessary, to prevent erosion, or use wood material to act as sediment dams.
  - c. Ensure stumps from cut trees/large size brush are cut flush with ground.
  - d. Camouflage cut stumps, if possible.
  - e. Any trees or large size brush cut during fireline construction should be scattered to appear natural.
- 2) Camps:
  - a. Restore campsite to natural conditions as much as possible
  - b. Scatter fireplace rocks, charcoal from fire; cover fire ring with soil; blend area with natural cover.
  - c. Pack out all garbage and unburnables.
- 3) General:
  - a. Remove all signs of human activity (plastic flagging, small pieces of aluminum foil, litter).
  - b. Restore helicopter-landing sites.
  - c. Cover, fill in latrine sites.



## Appendix D Invasive Species and Weed Management Planning in the Santa Monica Mountains National Recreation Area

Approximately 275 exotic plant species occur in the Santa Monica Mountains National Recreation Area (SMMNRA), composing over 27% of the flora. The California Exotic Pest Plant Council (CalEPPC) has rated 46 of these exotic species to be among those of “greatest ecological concern” in California (Table D-1). Based on workshops with local botanists and land managers the park has identified 14 of the CalEPPC species plus four additional species to be of greatest priority for monitoring and control in the SMMNRA (designated by an “S” under “SMMNRA Priority” in Table D-1). All occurrences of these species are currently being mapped. Three of the SMMNRA priority species and six CalEPPC species occur in stands large enough (> 0.5 ha) to be identified as community types in the vegetation map being developed (designated by a “CT” under “SMMNRA Priority” (Table D-1) .

The park is in the beginning stages of developing a weed management plan for the SMMNRA. The goal of this plan is to analyze the driving factors behind exotic species ingression, identify the manageable dimensions of the problem, and to prescribe actions for containment and control. Fire management is intimately connected to weed management in the SMMNRA because of the connection between fire, fuel management, and the occurrence, establishment and spread of many exotic species in the mountains.

Table D-1 Exotic Pest Plants of Greatest Ecological Concern in the Santa Monica Mountains National Recreation Area

Latin Name	Family	Cal-EPPC <sup>1</sup>	CDFA Nox <sup>2</sup>	SMMNRA Priority <sup>3</sup>	Status
<i>Ageratina adenophora</i>	ASTERACEAE	B			Uncommon
<i>Ailanthus altissima</i>	SIMAROUBACEAE	A-2	C		Uncommon
<i>Ammophila arenaria</i>	POACEAE	A-1		CT	Uncommon
<i>Arundo donax</i>	POACEAE	A-1	C	S	Common
<i>Asphodolus fistulosus</i>	LILIACEAE	—		S	Uncommon
<i>Atriplex semibaccata</i>	CHENOPODIACEAE	A-2			Common
<i>Avena barbata</i>	POACEAE	AG		CT	Common
<i>Avena fatua</i>	POACEAE	AG		CT	Common
<i>Bassia hyssopifolia</i>	CHENOPODIACEAE	B			Uncommon
<i>Brachypodium distachyon</i>	POACEAE	AG			Uncommon
<i>Brassica nigra</i>	BRASSICACEAE	B		CT	Common
<i>Brassica tournefortii</i>	BRASSICACEAE	A-2			Rare
<i>Bromus diandrus</i>	POACEAE	AG		CT	Common

Latin Name	Family	Cal-EPPC <sup>1</sup>	CDFA Nox <sup>2</sup>	SMMNRA Priority <sup>3</sup>	Status
Bromus madritensis ssp. rubens	POACEAE	A-2		CT	Common
Bromus tectorum	POACEAE	A-1			Uncommon
Cardaria draba	BRASSICACEAE	A-2	B		Rare
Carduus pycnocephalus	ASTERACEAE	B	C		Common
Carpobrotus edulis	AIZOACEAE	A-1			Common
Centaurea maculosa	ASTERACEAE	RA	A		Rare
Centaurea melitensis	ASTERACEAE	B	C		Common
Centaurea solstitialis	ASTERACEAE	A-1	C	S	Uncommon
Cirsium vulgare	ASTERACEAE	B	C		Common
Conium maculatum	APIACEAE	B		S	Uncommon
Cortaderia jubata	POACEAE	A-1	C	S	Uncommon
Cynara cardunculus	ASTERACEAE	A-1	B		Uncommon
Ehrharta erecta	POACEAE	B			Common
Erechtites minima	ASTERACEAE	B			Rare
Eucalyptus globulus	MYRTACEAE	A-1			Uncommon
Euphorbia terracina	EUPHORBIACEAE	—	Q	S	Uncommon
Foeniculum vulgare	APIACEAE	A-1		S, CT	Common
Iris pseudacorus	IRIDACEAE	B			Uncommon
Lepidium latifolium	BRASSICACEAE	A-1	B	S	Uncommon
Lolium multiflorum	POACEAE	AG		CT	Uncommon
Mentha pulegium	LAMIACEAE	A-2			Uncommon
Mesembryanthemum crystallinum	AIZOACEAE	B			Common
Myoporum laetum	MYOPORACEAE	A-2		S	Uncommon
Nicotiana glauca	SOLANACEAE	—		S	Common
Pennisetum setaceum	POACEAE	A-1		S, CT	Common
Phalaris aquatica	POACEAE	B		S, CT	Uncommon
Potamogeton crispus	POTAMOGETONACEAE	B			Rare
Ricinus communis	EUPHORBIACEAE	B		S	Common
Rubus discolor	ROSACEAE	A-1			Uncommon
Salsola australis	CHENOPODIACEAE	—		S	Common
Schinus molle	ANACARDIACEAE	B			Uncommon
Schismus arabicus	POACEAE	AG			Rare
Schismus barbatus	POACEAE	AG			Rare
Senecio mikanoides	ASTERACEAE	A-1	C	S	Uncommon
Spartium junceum	FABACEAE	B	C	S	Uncommon
Tamarix ramosissima	TAMARICACEAE	A-1	C		Rare
Vinca major	APOCYNACEAE	B		S	Uncommon

### I California Exotic Pest Plant Council Ranking

List A: Most Invasive Wildland Pests; documented as aggressive invaders that displace natives and disrupt natural habitats.

Includes two sublists:

A-1: Widespread pests that are invasive in more than 3 Jepson (manual) regions

A-2: Regional pests invasive in 3 or fewer Jepson regions

List B: Wildland Pest Plants of Lesser Invasiveness; invasive pest plants that spread less rapidly and cause a lesser degree of habitat disruption; may be widespread or regional. Red Alert: Potential to spread explosively; infestations are currently restricted. Annual Grass: Annual grasses abundant and widespread in CA, that pose significant threats to wildlands

## **2 California Department of Food and Agriculture Ranking**

- A: Organism of known economic importance subject to state enforced action involving: eradication, quarantine, containment, rejection, or other holding action.
- B: Organism of known economic importance subject to: eradication, containment, control or other holding action at the discretion of the individual county agricultural commissioner
- C: An organism subject to no state enforced action outside of nurseries except to retard spread. At the discretion of the agricultural commissioner.
- Q: An organism requiring temporary "A" action pending determination of a permanent rating.

## **3 Santa Monica Mountains National Recreation Area Mapping Priority**

- S: 87 Species of greatest ecological concern. Mapped as individual species within the SMMNRA
- CT: Species that occur in large enough stands (>0.5 ha) to be mapped as vegetation community types.



## Appendix E List of Agencies and Recipients Contacted

The following contacts were sent an invitation to obtain a copy of the *Draft SMMNRA Fire Management Plan/EIS*. This list is not exclusive; additional avenues for public input were sought.

### *Federal Agencies/Offices*

- Advisory Council on Historic Preservation
- US Dept. of the Navy, Naval Air Weapons Station, Point Mugu
- US Department of the Interior
  - US Fish & Wildlife Service
  - US Geological Survey
- US Environmental Protection Agency
- Federal Emergency Management Agency
- National Oceanic and Atmospheric Administration
- National Marine Fisheries Service
- Office of Senator Diane Feinstein
- Office of Senator Barbara Boxer
- Office of Congressman Brad Sherman
- Office of Congressman Elton Gallegly
- Office of Congressman Henry Waxman
- Office of Congressman Howard Berman

### *State Agencies/Offices*

- California Coastal Commission
- California Historic Preservation Officer
- California Department of Fish and Game
- California Department of Water Resources
- California Department of Parks and Recreation
- California Department of Transportation
- Santa Monica Mountains Conservancy/Mountains Recreation and Conservation Authority
- Office of State Senator Sheila Kuehl
- Office of State Senator Tom McClintock
- Office of State Assemblyman Paul Koretz
- Office of State Assemblywoman Fran Pavley

## *County & Municipal Agencies/Offices*

- South Coast Air Quality Management District
- Office of Los Angeles County Supervisor Zev Yaroslavsky
- Office of Ventura County Supervisor Linda Parks
- Las Virgenes Municipal Water District
- Calleguas Municipal Water District
- City of Agoura Hills
- City of Beverly Hills
- City of Calabasas
- City of Hidden Hills
- City of Los Angeles
- City of Malibu
- City of Santa Monica
- City of Simi Valley
- City of Thousand Oaks
- City of Westlake Village
- County of Los Angeles Department of Parks and Recreation, Planning Division
- County of Ventura Planning Division
- Conejo Recreation and Park District
- Conejo Open Space Agency
- County of Ventura Fire Protection District (Ventura Co. Fire Dept.)
- The Consolidated Fire Protection District of Los Angeles County

- Los Angeles (City) Fire Department
- Beverly Hills Fire Department
- Charmlee Wilderness Park
- Los Angeles County of Regional Planning
- University of California Los Angeles Stunt Ranch Reserve

## *Native American Organizations*

- Santa Ynez Band of Mission Indians
- Owl Clan Consultants
- Hutash Consultants

## *Community Organizations*

- Mulholland Scenic Corridor Design Board
- Resource Conservation District of the Santa Monica Mountains
- Mountains Restoration Trust
- National Trust for Historic Preservation
- National Parks Conservation Association
- Sierra Club
- Audubon Society
- California Preservation Society
- Southern California Association of Governments

# Appendix F Input and Response to Draft SMMNRA Fire Management Plan/EIS

## Commentator Summary

Table F-I Commentator Summary Table

	Commentor Name	Comment Category	Comment Number
Government Agencies	U.S. Army Corps of Engineers	Permit required	1
	U.S. Environmental Protection Agency	Air quality	2
		Alternatives to prescribed burning	3
		Air quality analysis	4
		Alternatives analysis	5
		Mechanical alternatives	6
		Mitigation measures	7
		Alternative 6	8
		Emissions analysis	9
	National Oceanic and Atmospheric Administration	Steelhead trout impacts	10
		ESA Section 7 consultation	11
	California Department of Parks and Recreation	Prescribed burning	12
		Definitions	13
		Resource Advisor	14
Decision model		15	
Landscape era		16	
Sensitive species		17	
National Historic Register		18	
State Wilderness Area		19	
Terminology		20	
Park closures		21	
Prescribed burn benefits		22	
County of Los Angeles Fire Department	Defensible space	23	
	Vegetation management	24	
	Comprehensive strategy	25	
	Environmental compliance	26	
	Conflicts with LA County Fire Plan; Reject all alternatives	27	
	Federal Fire Policy	28	
	Agency collaboration	29	
County of Los Angeles Department of Parks and Recreation	No impact	No response required	
Ventura County Air Pollution Control District	Smoke management plan and permit required	30	
	Mitigation measures	31	

	Commentor Name	Comment Category	Comment Number
Groups and Organizations	California Native Plant Society	Bias	32
		Terminology	33
		Invasives, type conversion	34
		Fuel modification, erosion	35
		Figure 3-22	36
		Erosion, flood	37
		Strategic fuel modification	38
		Suppression	39
		Fuel modification	40
		Land use	41
		Prevention	42
		Ecological prescribed fire	43
		Mechanical fuel reduction	44
		Alternatives	45
		Protection of natural resources	46
Groups and Organizations	Pacific Palisades Community Council; Pacific Palisades Residents Association; Wildfire Research Network	Support preferred alternative	47
		Strategic fuel modification criteria	48
		Area of concern	49
Individuals	Stephanie Blanc	Destruction of resources	50
		Conclusions inconsistent with analysis	51
		Preferred alternative inconsistent with NPS mandate	52
		Mitigation of annual destruction of parkland	53
		Type conversion	54
		Mitigation, type conversion	55
		Roads	56
		Mechanical fuel modification	57
		Insects	58
		Bees	59
		Insects	60
		Restoration costs	61
		Arthropods	62
		T&E species	63
		Habitat connectivity	64
		Habitat fragmentation	65
		Catastrophic species loss	66
		Land use	67
		Cooperation	68
		Fuel modification standards	69
		Invasives	70
		Cooperation	71
		Reject preferred alternative ("burn it up or mechanically tear it out of your heart")	72
NPS mandate	73		

	Commentor Name	Comment Category	Comment Number
Individuals	Don Mullally	Comments not in reference to FMP	74
	Pamela Palmer	Fuel modification zone Minimize impacts	75 76
	Ronald Rindge 8/2/04	Comments directed to Los Angeles County Fire Department	77
	Ronald Rindge 8/10/04	Water storage tanks	77
	B. Sachau	Land use Prescribed fire air quality health effects	78 79
	Roland Tso	Reducing fire risk opposed Protect natural resources Another alternative needed	80 81 82
	Charlie Whitman	Safety not provided for Resource protection favored over safety Bias Scale of impacts limited Data invalid Safety and interagency cooperation not provided for NEPA, social risk Federal fire policy excluded Preferred alternative inconsistent with goals Restoration funding Cooperative relationships Risk analysis inadequate NEPA requirements inappropriate NPS mechanical fuel treatments inadequate Definitions/Strategic fuel modification Age mosaic WUI fuel reduction Defensible space/Obstacles created Firefighter safety	83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101
	Karen Cleaver; Mary Pelletier; Katherine Glascock; Frances Knight	NPS mandate Natural resource degradation NPS standards and recommendations DO # 18 CNPS guidelines Conservation ethics GMP goals	102 103 104 105 106 107 108

	Commentor Name	Comment Category	Comment Number
<b>Individuals</b>	Karen Cleaver; Mary Pelletier; Katherine Glascock; Frances Knight continued	Botanical surveys	109
		Strategic fuel modification	110
		Rehabilitation funding	111
		Prescribed burning	112
		Mechanical fuel modification	113
		Ecosystem resilience	114
		Resource protection	115
		Environmental change	116
		Spiritual values vs. safety	117
		Staging areas	118
		Mechanical fuel modification – bulldozers	119
		Rehabilitation	120
		Environmental impacts	121
		Decision making process	122
		No benefits to strategic fuel modification	123
		Spring burns	124
		Adverse impacts	125
		Diminishing natural resources, reduce fuel modification	126
		Inadequate data	127
		Natural resource heritage	128
Size fuel modification zone	129		
Target conditions	130		
Pollinators/herbicides and pesticides	131		
Restoration and monitoring	132		
Seedbank	133		
Erosion	134		
Invasive species introductions	135		
Disking	136		
Roads and trails	137		
Development inducing	138		
Exotic plant control	139		
Super-scooper helicopter	140		
<b>Additional Input</b>	Santa Ynez Band of Mission Indians	Native American monitor	141
	Ventura County Fire Department	Land use/wildland development	142
		FMP inadequate to scale of problem	143
		Lack of balance	144
		No increase in mechanical treatment	145
	Ecological prescribed fire	146	
Los Angeles City Fire Department	Support Alternative 2	147	

Input 1

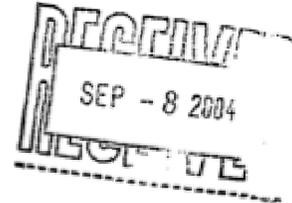


DEPARTMENT OF THE ARMY  
LOS ANGELES DISTRICT, CORPS OF ENGINEERS  
VENTURA FIELD OFFICE  
2151 ALESSANDRO DRIVE, SUITE 110  
VENTURA, CALIFORNIA 93001

September 3, 2004

REPLY TO  
ATTENTION OF:

Office of the Chief  
Regulatory Branch



National Park Service Santa Monica Mountains Recreation Area  
Attention: Woody Smeck  
401 West Hilcrest Drive  
Thousand Oaks, California 91360

Dear Mr. Smeck:

It has come to our attention that you plan dated July 15, 2004 to approve a Fire Management Plan for the Santa Monica Mountains National Recreation Area in Ventura County, California. Unfortunately, due to our current permit workload we are unable to provide detailed comments on the document at this time.

However, please be advised the proposed project may require a U.S. Army Corps of Engineers permit for any activity that may temporarily or permanently impact waters of the United States by way of fill material or construction equipment.

A Corps of Engineers permit is required for the discharge of dredged or fill material into, including any redeposit of dredged material within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to,

1. creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;
2. mechanized landclearing, grading which involves filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States;
3. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States;
4. placing pilings when such placement has or would have the effect of a discharge of fill material.

Input I continued

-2-

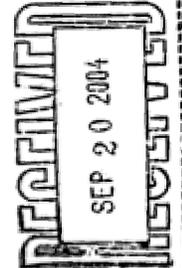
You will find a permit application form and a pamphlet that describes our regulatory program on the Corps Los Angeles District webpage at [www.spl.usace.army.mil/regulatory](http://www.spl.usace.army.mil/regulatory). If you have any questions, please contact me at (805) 585-2140. Please refer to this letter and 200401788-HW in your reply.

Sincerely,

Heather Wylie  
Project Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901



September 13, 2004

Woody Smeck, Superintendent  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360-4207

Subject: Santa Monica Mountains National Recreation Area Fire Management Plan Draft  
Environmental Impact Statement (DEIS) [CEQ #040268]

Dear Mr. Smeck:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

We have rated this DEIS as EC-2 -- Environmental Concerns-Insufficient Information (see enclosed "Summary of Rating Definitions"). We agree with the National Park Service that fire management is extremely important in the Santa Monica Mountains National Recreation Area (SMMNRA), especially because of its proximity to and wildland/urban interface with densely populated areas of Los Angeles and Ventura counties. We are concerned, however, that the prescribed burn treatments included in the proposed alternative may result in more adverse air quality impacts than using only mechanical treatment to meet the same needs. We recommend that the Final Environmental Impact Statement (FEIS) analyze an alternative that would achieve ecological and strategic fuels treatment via mechanical means rather than through prescribed burning. The FEIS should also analyze air quality impacts for criteria pollutants other than PM10 (particulates smaller than ten microns). Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS and request a copy of the FEIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3854, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

A handwritten signature in black ink that reads "Lisa B. Hanf".

Lisa B. Hanf, Manager  
Federal Activities Office

*Printed on Recycled Paper*



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
Southwest Region  
501 West Ocean Boulevard, Suite 4200  
Long Beach, California 90802- 4213

SEP 15 2004 151422SWR04PR13930:APS

Woody Smeck  
National Park Service  
Santa Monica Mountains Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, California 91360

Dear Mr. Smeck:

The National Marine Fisheries Service (NOAA Fisheries) reviewed the National Park Service's draft Environmental Impact Statement (EIS) for implementation of a fire management plan (plan) at the Santa Monica Mountains National Recreation Area. The following constitutes NOAA Fisheries views on the draft EIS.

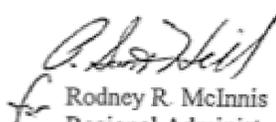
With regard to the description of the affected environment, the life history of the endangered Southern California Evolutionarily Significant Unit of steelhead (*Oncorhynchus mykiss*) includes rearing in streams for one or more years until such a time when they are physiologically ready to enter seawater. Juvenile steelhead rear year round in Malibu Creek, Topanga Creek and Arroyo Sequit and, therefore, impacts of fires on this species would involve spawning as well as rearing life stages, including life stages that develop in the gravel prior to an "open-water" existence.

With regard to impacts of the alternatives, because steelhead rear in streams all year, siltation of rearing habitat is of concern as well as siltation of spawning habitat. While the EIS does identify some of the impacts that are expected to result from the proposed action, the EIS does not adequately address the consequences of the impacts for endangered steelhead at the individual or population level.

With regard to section 7 of the Endangered Species Act of 1973, adoption of the plan will require consultation with NOAA Fisheries. Presently, the EIS makes no mention of this requirement.

Thank you for the opportunity to review the draft EIS. Please call Anthony Spina at (562) 980-4045 if you have any questions concerning this letter or if you would like additional information.

Sincerely,

  
for Rodney R. McInnis  
Regional Administrator



## Input 4



State of California • The Resources Agency

Arnold Schwarzenegger, *Governor*

DEPARTMENT OF PARKS AND RECREATION

Ruth G. Coleman, *Director*

Fire/Trails Management Program  
Angeles District  
39998 Pacific Coast Highway  
Malibu, California 90265  
310-457-4358

September 17, 2004

Fire Management Program  
Attention: Marty O'Toole FIO  
SMMNRA

Subject: Comments, EIR Fire Management Plan SMMNRA

I have reviewed the Draft, Environmental Impact Statement – Fire Management Plan for the Santa Monica Mountains and wish to presents some comments regarding this plan.

The bulk of information contained in the plan was very informative and useful. I found that there were a few areas that needed consistency with current fire management terminology and areas that should have additional information included. Please review the following comments:

Page 2-6 There was no mention associated with using prescribed burning for other species other than plants. Example, Endanger species habitat enhancement

Page 2-14 I was not clear on the terms used to describe weed abatement and brush clearance. Are these two words inter-related? Would fuel reduction be more consistence with the intent for this chart?

Page 2-22 I would suggest that a Resource Advisor be assigned to the Incident Command structure, especially when potential endanger species habitat is threatened.

Page 3-39 I had difficulty trying to interpret the box “site-specific hazard mitigation instead of landscape level fuel modification”, could this be defined for better clarification?

Page 3-48 second paragraph, I not sure if there were any comments about what landscape era the plan was trying to identify? Is it referring to pre-european, or pre-human? What landscape is the plan aiming for? What information can be added to promote this process?

Page 3-76 Rare, Threatened and Endangered Species: Sensitive Plants. What is the status for the Giant Coreopsis plant?

Page 3-126 potentially eligible for the National Register... please includes the Sycamore House at Pt. Mugu State Park...

## Input 4 continued

Page 4-3 Within the SMMNRA we have a State Park Wilderness Area, Boney Mountain Wilderness Area, can this be mention in the draft.

Page 4-9 Mitigation Measures, Wildfire Suppression – Operational Impacts, section 2) the word center was used, to be consistent with fire terminology it should be change to **Post**.

Page 4-72 Proposed Actions, Wildfire Suppression. It would be very helpful if you would list your authority for closures. Example State Parks has a Superintendent Order to close backcountry units in state parks and during a wildfire we use California Penal Code 409.5 as our enforcement authority.

4-79 Alternative I – No-Action Alternative. Could you please also mention that the 1996 prescribed burn conducted adjacent to Las Virgenes Road by California State Parks had significant influence in the direction of the Calabasas Wildfire Incident in 1996. Post-simulator studies were conducted by Ishmael Messer, FMO for the SMMNRA that displayed that the prescribed burn did assist firefighting efforts which kept the fire from advancing toward the Malibu Lake community.

I hope that my comments are useful for the completion of the EIS Fire Management Plan and I am looking forward to the new plan. I thank you the opportunity for commenting on this document.

Sincerely,

Frank Padilla, Jr., SPS I  
Fire Management Coordinator



# Board of Supervisors County of Los Angeles

MICHAEL D. ANTONOVICH  
SUPERVISOR

August 2, 2004

TO: Chief P. Michael Freeman  
Los Angeles County Fire Department

FROM: MICHAEL D. ANTONOVICH  
Supervisor

SUBJECT: Correspondence from Mr. Woody Smeck

The attached correspondence is requesting the County's comments on the National Park Service's Draft Environmental Impact Statement for a Fire Management Plan at Santa Monica Mountains National Recreation Area.

Please review this matter and take the appropriate action.

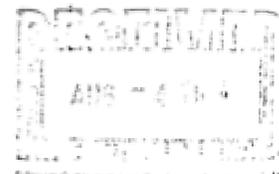
Thank you.

MDA:snj

Attachment

Cc: Mr. Woody Smeck  
United States Department of the Interior  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360-4207

Norm Hickling, Senior Deputy





COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
Fax (323) 265-9948
(323) 881-2401

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

June 21, 2002

Woody Smeck, Acting Superintendent
United States Department of the Interior
National Park Service
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360-4207

Dear Acting Superintendent Smeck:

COMMENTS REGARDING ENVIRONMENTAL IMPACT
STATEMENT - FIRE MANAGEMENT PLAN

Thank you for the opportunity to comment on the Environmental Impact Assessment for the Santa
Monica Mountains National Recreation Area (SMMNRA) Fire Management Plan. I believe that we
share common values and interests, including the protection of the environment.

Personnel from our Operations Bureau and Forestry Division attended two of the public meetings held
in the Santa Monica Mountains (SMM), regarding the range of alternatives being considered for the
Fire Management Plan. We listened to comments made by citizens and other agencies and provided
input concerning this important task. We note that the SMMNRA is highly unique in natural, cultural,
and scenic resources. It includes a highly diverse public with numerous public agencies, jurisdictions
and non-profit organizations. I cannot think of another park with such a complex mixture of issues.

I believe that both of our organizations recognize that wildland fires are a major issue in the SMM.
Fire can rapidly transform a peaceful and tranquil community into a major catastrophe. Wildland fires
in the SMM are generally controllable under moderate weather, but when flames are driven by high
winds, low humidity, and in heavy fuels, firefighting becomes more of a directing effort. The most
sophisticated firefighting equipment and highly trained personnel have limited suppression success
under extreme weather and fuel conditions. The major success only results when this suppression
capability is combined with fire prevention efforts.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- AGOURA HILLS BRADBURY CUDAHY HAWTHORNE LA MIRADA MALIBU POMONA SIGNAL HILL
ARTESIA CALABASAS DIAMOND BAR HIDDEN HILLS LA PUENTE MAYWOOD RANCHO PALOS VERDES SOUTH EL MONTE
AZUSA CARSON DUARTE HUNTINGTON PARK LAKEWOOD NORWALK ROLLING HILLS SOUTH GATE
BALDWIN PARK CERRITOS EL MONTE INDUSTRY LANCASTER PALMDALE ROLLING HILLS ESTATES TEMPLE CITY
BELL CLAREMONT GARDENA INGLEWOOD LAWNSDALE PALOS VERDES ESTATES ROSEMEAD WALNUT
BELL GARDENS COMMERCE GLENDORA IRVINDALE PARAMOUNT SAN DIMAS WEST HOLLYWOOD
BELLFLOWER COVINA HAWAIIAN GARDENS LA CANADA-FLINTRIDGE LYNWOOD PICO RIVERA SANTA CLARITA WESTLAKE VILLAGE
WHITTIER

## Input 6a continued

Woody Smeck, Acting Superintendent  
June 21, 2002  
Page 2

### Recommendations

We highly recommend Alternative #2. This is a broad alternative. It does not favor one strategy over another without analysis of a specific area and resource information, objectives, values to be protected, safety, risk, complexity, and other considerations. This alternative provides the maximum number of tools to be available for performing fuels treatments. This alternative would have the greatest potential benefit. Both firefighters and the public safety would be enhanced, real property and natural and cultural resources protected, and potential suppression costs significantly reduced through the utilization of a wide-range of alternatives. We totally agree that an educated citizenry is imperative to living safely in the SMM.

We believe that it is possible for all the responsible fire agencies to work together to develop a comprehensive fire management plan for the SMM. Each agency has its own mission and concerns, but we all share a common need to find effective solutions. We also have talented and resourceful staff who have the ability to work together for a common cause. Focusing on the reduction of fuel hazards in strategic locations has been our most successful means of protecting life and property.

Data for the SMM is abundant. In the past, we have worked together to develop data including classifying vegetation from an Airborne Visible/Infrared Imaging Spectrometer (AVIRIS) flights over the SMM. This cooperative project with not only your agency but also the University of California at Santa Barbara, National Aeronautics and Space Administration, Riverside Fire Laboratory, and others has resulted in some of the best vegetation and fuels classification to be found in the Nation. Cooperative efforts such as this will result in improvements in our ability to effectively manage wildfire.

### Other Alternatives

Below are our concerns regarding Alternatives 1, 3 and 4:

**Alternative 1** – It is not possible to conduct the broad scale prescribed burning described in the current NPS vegetation management program. Past history clearly shows that we are not able to put together projects and conduct them on a landscape scale. We strongly opposed to minimizing brush clearance. Brush clearance is not only responsible for helping to protect structures from wildfire but also reduces the potential for a structure fire spreading to the wildland. The creation of a fuel modification zone around structures is vital to fire suppression, firefighters and public safety.

**Alternative 3** – Prescribed burning in strategic locations for fuels reduction is often a best management practice. It should not be limited to only resource enhancement. We agree that mosaic burning should be abandoned. Brush clearance methods may include the use of fire, biological, mechanical, and hand clearing or modification techniques. Education of the public is strongly supported by this Department. We recognize that government and the public must work together to achieve the desired outcomes.

Input 6a continued

Woody Smeck, Acting Superintendent

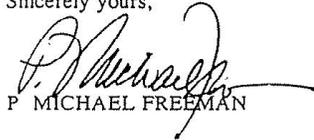
June 21, 2002

Page 3

Alternative 4 – Limiting vegetation management to only brush clearance is not acceptable. Historically, nearly half of structure losses that occur during catastrophic wildfires result from embers and not direct flame impingement. The strategic reduction of fuels upwind of communities has been demonstrated to be effective in reducing both the number and size of embers falling into these communities. This treatment lessens the potential for loss. We believe that prescribed fires should be considered as one of several fuels treatments. It is definitely not a panacea but should be considered along with biological, hand and mechanical treatment methods or combinations thereof.

Thank you for allowing our comments to be considered regarding your Environmental Impact Statement. Should there be any questions regarding our comments, please contact Assistant Chief Herbert Spitzer at (323) 890-4330.

Sincerely yours,



P. MICHAEL FREEMAN

PMF:lc

Input 6b



**United States Department of the Interior**  
**NATIONAL PARK SERVICE**

Santa Monica Mountains National Recreation Area  
401 W. Hillcrest Drive  
Thousand Oaks, California 91360-4207

Y14(SAMO)  
September 24, 2004

P. Michael Freeman  
Chief, Los Angeles County Fire Department  
1320 North Eastern Avenue  
Los Angeles, CA 90063-3294

Dear Chief Freeman:

We have received your department's comment letter dated August 4, 2004 regarding our Draft Environmental Impact Statement (DEIS) and Fire Management Plan for the Santa Monica Mountains National Recreation Area (SMMNRA). The comments raise a number of concerns regarding the approaches proposed by our agency in pre-fire planning and fuels management on National Park Service lands within the SMMNRA. The response further states that the department cannot support any of the four alternatives proposed in the DEIS, including the continuation of our existing Fire Management Plan.

We have actively sought the input of the department at all stages of revising our Fire Management Plan, beginning with an initial scoping workshop held in June 2001. A letter from your department dated June 21, 2002 gave us encouragement that our course of action was on the right track; indeed, it strongly supported Alternative 2, which we found to be the preferred alternative. We are understandably confused as to the abrupt change in the department's support of the direction of the DEIS.

We take these concerns very seriously. Without the support and cooperation of the Los Angeles County Fire Department, the National Park Service cannot be successful in implementing a Fire Management Plan to protect lives and property while conserving national park resources. The final paragraph of the comments emphasizes the necessity of our two agencies to work collaboratively, and we cannot agree more. To this end, I propose a meeting between my staff and members of your forestry and weed abatement teams to discuss concerns and find common ground for solutions. My Fire Management Officer Kathryn Kirkpatrick will be contacting you shortly to arrange a convenient time and location for the meeting. If you have any questions, please contact Kathy at (805-370-2391) or Fire Education Specialist Marty O'Toole at (805) 370-2364.

Thank you again for your comments. We look forward to working with you in completing our Fire Management Plan.

Sincerely,

Woody Smeck  
Superintendent

Attachments

cc: FMO, SAMO  
David Leininger, LACoFD Forestry Division  
5823 Rickenbacker Road  
Commerce, CA 90040



**United States Department of the Interior**  
**NATIONAL PARK SERVICE**  
Santa Monica Mountains National Recreation Area  
401 W. Hillcrest Drive

Y14 (SAMO)  
December 06, 2004

David R. Leininger  
Chief, Forestry Division, Los Angeles County Fire Department  
5823 Rickenbacker Avenue  
Commerce, CA 90040

Dear Chief Leininger:

This letter provides notes on the Draft Fire Management Plan Environmental Impact Statement (DEIS) meeting held in your office on Wednesday November 3, 2004 and our response to your comments. Your concerns regarding the approaches proposed by our agency in pre-fire planning and fuels management on National Park Service (NPS) lands within the Santa Monica Mountains National Recreation Area (SMMNRA) are hopefully captured below.

1. National Fire Plan hazardous fuels reduction proposals – internal review process of SAMO. Clarify the proposal timeline and Park review process as well as proposal parameters.
2. Project criteria of slope, fuels and age class for areas of hazard reduction too limited. Example: homes above steep slopes will require some mitigation in fuels reduction. Additional review criteria such as roof type, access roads, infrastructure, water supply, building construction, fuel condition, topography, structure placement, and community input/local knowledge.
3. Fuel modification standard operating procedure on land adjacent to NPS land: historical, newly acquired Park land and new homes bordering Park lands. Case by case reviews.
4. Include goats in fuel management, they have been used at Big rock and on the Etz Melloy motorway.
5. Brush crusher use in fuels management not mentioned.
6. LA County Fire envisions that the majority of vegetation management projects will be focused adjacent to communities.

Our response to each of these issues is as follows:

1. National Fire Plan hazardous fuels reduction proposals. All projects with federal funding must go through the Park's internal environmental review process. SMMNRA proposes to clarify the region's selection criteria for NFP projects and provide clear and early direction to all partner agencies on project criteria. Project areas, objectives and potential issues will be identified and resolved with partner agencies prior to project submittal.
2. Project criteria of slope, fuels and age class for areas of hazard reduction. SMMNRA welcomes the opportunity to include additional criteria for project evaluation. The DEIS analysis was an initial effort to evaluate projects with objective criteria and make those

## Input 6c continued

3. Fuel modification on land adjacent to NPS land: historical, newly acquired Park land and new homes bordering Park.  
In general, the Park provides fuel modification (brush clearance) on all Park properties that have historically been cleared to protect homes that were built close to Park property prior to Park acquisition. We are updating the tables in the DEIS and all properties will be considered as case by case reviews. Fuel modification (brush clearance), clearing native vegetation on parkland in order to accommodate new development on adjacent private land would not be permitted under NPS Management Policies (2001) and 16 USC Sect 1-4 and 460kk. We prefer the property owner site their development 200 feet from park boundary and have worked with the County to ensure this happens. The Park will continue to work with LA County's Fuel Modification Unit to develop appropriate fuel modification plans for any new development adjacent to park property.
4. Goats. We view goats as one of several methods to achieve fuel modification and will make a note to this effect in the DEIS. It is important to remember that the DEIS applies only to actions by NPS on park property. We have historically performed mechanical fuel modification to reduce fuel loads on our properties and do not foresee using goats in these areas. This is the reason that goats are not identified as one of the methods to be used in the park's fuel modification program.
5. Brush crusher use. We consider the use of the brush crusher as a method to facilitate prescribed burning in chaparral or sage scrub under certain seasonal conditions. We have not addressed the use of the brush crusher because the DEIS applies only to actions by NPS on park property and there is no specific prescribed burn project proposed on Park property that would require the brush crusher. In the event that a strategic prescribed burn project is identified for park property, the use of the brush crusher to implement the project would be evaluated.
6. Vegetation management projects will be focused adjacent to communities. NPS concurs that the most effective projects to limit structure loss are those located adjacent to development.

If this meets your needs this will be included in the final EIS. Please contact Kathy Kirkpatrick at (805) 370-2391 if you have any questions regarding this information.

Sincerely,



Woody Smeck

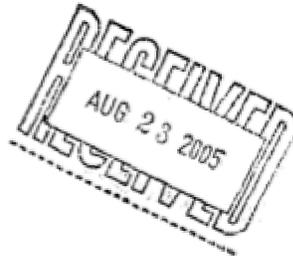


**COUNTY OF LOS ANGELES**

**FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE  
 LOS ANGELES, CALIFORNIA 90063-3294  
 (323) 890-4330

P. MICHAEL FREEMAN  
 FIRE CHIEF  
 FORESTER & FIRE WARDEN  
 August 19, 2005



Woody Smeck, Superintendent  
 United States Department of the Interior  
 National Parks Service  
 Santa Monica Mountains National Recreational Area  
 401 West Hillcrest Drive  
 Thousand Oaks, CA 91360

Dear Mr. Smeck:

**SUPPORT OF THE FINAL DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE SANTA MONICA MOUNTAINS RECREATION AREA "FIRE MANAGEMENT PLAN" – "WESTERN LOS ANGELES COUNTY" REVISED (EIR #2062/2004)**

*This communiqué is intended to confirm our commitment to collaboratively work with the National Park Service (NPS) in support of the implementation of a fire management policy in the Santa Monica Mountains National Recreation Area (SMMNRA). Although both agencies have distinct missions and concerns, we agree that firefighter and public safety are the first priority in the development of a fire management plan. The fostering of open dialogue between agencies has been instrumental to the process of bridging fire plan policy and producing meaningful pre-fire management solutions.*

In our Draft Environmental Impact Statement (DEIS) response, dated August 4, 2004, we outlined several pre-fire management policy issues not clearly stated or addressed in the DEIS. These concerns were primarily the result of previous unsuccessful attempts to plan and implement effective pre-fire management projects with SMMNRA staff. The NPS response, dated July 20, 2005, summarized the inclusion of our concerns in the final EIS. Specifically, concerns related to defensible space, vegetation management, comprehensive strategy, environmental compliance/age mosaic, conflicts with Los Angeles County Fire Plan and the 2001 Federal Wildland Fire Management Policy guiding principle #1, "firefighter and public safety are the first priority in every fire management policy".

Additionally, your correspondence addressed six (6) issues of concern identified by our Department in the pre-fire planning meeting held in November 2004. The six (6) issues of concern are listed as follows:

- Include goats in fuel management.
- Brush crusher/gravity roller in fuels management not mentioned.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LANEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWRENDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENDALE	IRVINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
			LA HABRA				WHITTIER

## Input 6d continued

**Woody Smock, Superintendent**

**August 19, 2005**

**Page 2**

- Focus vegetation management projects adjacent to communities.
- Clarify National Fire Plan hazardous fuels reduction proposals, process and timelines.
- Expand strategic fuel criteria to include roof type, access roads, infrastructure, water supply, building construction, structure placement and community input/local knowledge.
- Fuel Modification practices on NPS lands adjacent to development: historical, newly acquired park land and new homes bordering parklands.

The County of Los Angeles Fire Department agrees with the NPS proposals submitted to address the six (6) issues of concern in pre-fire planning and fuels management within and adjacent to the SMMNRA. We are also satisfied with the clarification and inclusion of the pre-fire management policy issues in the final EIS. As a result, the County of Los Angeles Fire Department reaffirms our support for alternative #2.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



DAVID R. LEININGER, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

DRL:sc



COUNTY OF LOS ANGELES  
DEPARTMENT OF PARKS AND RECREATION  
*"Creating Community Through People, Parks and Programs"*



Tim Gallagher, Director

September 2, 2004

RECEIVED  
SEP 9 2004  
SMMNRA-8540

Woody Smeck, Superintendent  
National Parks Service  
Santa Monica Mountains National Recreation Area  
Attn: Fire Management Plan  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360

Dear Mr. Smeck:

**NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT  
(EIR) FOR THE FIRE MANAGEMENT PLAN**

The Draft EIR for the Santa Monica Mountains National Recreation Area Fire Management Plan has been reviewed for potential impact on the facilities of this Department. Development of the project as described in the Draft EIR will not impact facilities under the jurisdiction of this Department.

Thank you for including this Department in the review of this environmental document. If we may be of further assistance, please contact me at (213) 351-5133.

Sincerely,

Bryan Moscardini, Park Project Coordinator for  
Joan Rupert, Section Head

## Input 8



Ventura County  
Air Pollution  
Control District

669 County Square Dr  
Ventura, California 93003

tel 805/645-1400  
fax 805/645-1444  
www.vcapcd.org

Michael Villegas  
Air Pollution Control Officer

September 15, 2004

via Email: samo\_fire@nps.gov

Woody Smeck,  
Superintendent  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360-4207

Subject: Request for Review of Draft Environmental Impact Statement for Santa Monica  
Mountains National Recreation Area Fire Management Plan

Dear Mr. Smeck:

Air Pollution Control District staff has reviewed the subject project environmental impact statement, which evaluates potential environmental impacts from implementation of various fire management alternatives in the Santa Monica Mountains National Recreation Area (SMMNRA). Every federal park area with burnable vegetation must have a fire management plan approved by the superintendent. The selected alternative will become the basis of the SMMNRA Fire Management Plan, which is the five-year implementation plan for the Park's fire management actions. The project area is situated between the Los Angeles Basin and the San Fernando Valley in Los Angeles County and the Oxnard Plain in Ventura County.

Section IV (F – Air Quality) of the environmental impact statement (EIS) addresses potential air quality impacts from the implementation of the fire management alternatives. Type of impact, duration of impact and intensity of impact are analyzed for each alternative with calculation of total suspended particulate emissions serving as proxy for other pollutants.

Please be advised that the Ventura County Air Pollution Control District requires a smoke management plan and a burn permit from the Ventura County Fire Department. The District's smoke management plan requirements can be found on our website at [www.vcapcd.org](http://www.vcapcd.org).

We recommend that offroad diesel-powered equipment used for mechanical fuel reduction not be left idling more than five minutes and be maintained in good condition and in proper tune as per manufacturers' specifications to reduce particulate and ozone precursor emissions.

Thank you for the opportunity to comment on this Plan. If you have any questions, please call me at (805) 645-1426 or email me at [alicia@vcapcd.org](mailto:alicia@vcapcd.org).

Sincerely,

s/s

## Input 9

### ***California Native Plant Society***

Los Angeles/Santa Monica Mountains Chapter

3908 Mandeville Canyon Road

Los Angeles, California 90049

September 15, 2004

Woody Smeck  
Superintendent  
Santa Monica Mountains National Recreation Area  
National Park Service  
401 W. Hillcrest Drive  
Thousand Oaks, California 91360

ATTN: Fire Management Plan Draft EIS

Dear Superintendent Smeck:

The Los Angeles/Santa Monica Mountains Chapter of California Native Plant Society has about 500 members. We are very concerned about the impacts of wildland fire in the urban interface on both humans and the globally-endangered Mediterranean ecosystems of southern California.

The Fire Management Plan Draft EIS for the Santa Monica Mountains National Recreation Area has been well written and, with the management portions removed, could well stand as an excellent natural history of the Santa Monica Mountains.

The Fire Management Plan itself seems to heavily favor humans and invasive plants over natural resources, however.

Comments:

1. Why is "fuel" apparently defined as chaparral and native plants, though the most common sources of ignition are non-native grasses, thistles, mustards and horticultural plantings (e.g. conifers, eucalypts, palms)?
2. Why isn't there a strong bias toward removing non-native plants instead of a constant bias toward type-conversion of native habitat to eroded, ruderal slopes?
3. With highly erodable hillsides throughout the Santa Monica Mountains, why does this document not support well-established complex root systems of chaparral, instead of emphasizing the need to disturb and destroy what has taken many decades or even centuries to produce?
4. In Figure 3-22 is the Change in Fire Hazard and Ecological Risk Following Fuels Treatment solely based on studies of *Ceanothus megacarpus*? There are few, if any, studies of chaparral habitat older than 36 years so why is there any certainty that the highly biodiverse chaparral systems will not be affected over time by "fuel" modification methods based on a time interval convenient to fire managers?

## Input 9 continued

5. Where is the consideration of siltation of streams, mudslides and slumps, and flooding caused by the four alternatives? We have been told by brush clearance inspectors for insurance companies and County Fire crews that they do not care about those issues. Aren't the geological impacts on humans and natural resources important? There is information in the text on these impacts but only as part of the natural history. Where do the Alternatives discuss these impacts in detail and how they will be mitigated?

6. How will Strategic Fuels Reduction prevent catastrophic fires that occur during seasons of Santa Ana winds? The information in the text seems to support the idea that catastrophic fires in Malibu and Topanga Canyons are inevitable, given Santa Ana winds > 60 mph blowing directly down those canyons. Roads are the common ignition points for wildfires and roads run down the center of each of those canyons.

7. Will Strategic Fuels Reduction remove the most common plant sources of ignition along roads, e.g. non-native grasses, mustards, thistles, broom, and escaped landscaping elements?

8. What are the follow-up plans for Strategic Fuels Reduction in an area? Will there be weed management? Erosion control? Will there be any attempt to preserve/conservate the native habitat?

9. Page 4-17: How can wildfire suppression methods which emphasize the destruction of native habitat have "a beneficial impact on the interaction between habitat fragmentation and wildfire impacts"? The reason: "because it reduces fire size and the amount of area repeatedly burned in the high fire frequency environment of the Santa Monica Mountains" is ludicrous. Conversion of healthy, relatively non-flammable native habitat to ruderal, erodable slopes simply increases the possibility of a greater frequency of low-temperature fires. Where is the rationale that any method will stop, or even slow down, catastrophic fires?

10. Page 4-17: Where is the rationale for "No new fuel modification on parkland is anticipated from new development"?

Where are the plans for the other jurisdictions in the Santa Monica Mountains to control land use changes to the benefit of the environment, to support reducing the frequency of wildfires through limitations on use and placement of flammable or invasive landscaping material and the use of flammable construction materials, as well as zoning/permitting restrictions that absolutely require 100-200 foot buffers between all structures and parkland boundaries? Natural resources survived 50 to 100 years or more between wildfires without fire management - before humans settled so densely in wildland areas.

Where are the fire suppression plans for the humans living in this ecosystem? Education is too weak a tool. Humans are not a globally endangered ecosystem. Mediterranean ecosystems are endangered around the world, most often by planning that ignores the values and strengths of these natural ecosystems.

11. Page 4-18: Alternative 2 has Strategic Fuels Reduction, Ecological Prescribed Fire, and Mechanical Fuel Reduction. See the previous questions about the value of Strategic Fuels Reduction.

Aren't grasslands the only habitat that might benefit from Ecological Prescribed Fire? Even then wouldn't there be years of follow-up weed management? What is the fire interval necessary under this method to encourage Valley Oaks, Coast Live Oaks and native bulbs, annuals and perennials as well as other rare native grassland plants to thrive under this fire regimen? Hasn't Ecological Prescribed Fire been unable to eliminate non-natives with well-established seed banks, such as milk thistle? What happens to the native seed banks under this fire regimen?

## Input 9 continued

Mechanical Fuel Reduction: Will all dead material be removed? We have pictures of chipped material sprayed into healthy chaparral canopy, damaging those trees' ability to process nutrients. We also have pictures of healthy non-flammable trees such as toyon and sugarbush cut down and thrown over the edge of the slope by a powerline road, creating an extreme fuel hazard that did not previously exist. This work was done by a crew of prisoners under the direction of a County Fireman. Many slopes have been denuded of shrubs without any of the underlying non-native grasses being disturbed. Is this what is meant by "Mechanical Fuel Reduction" - people mechanically remove any healthy native elements, create or increase fire hazards along roads and blame the increased fire frequency on what was healthy chaparral? Smilo grass and yellow star thistle have spread widely along that powerline access road since those "mechanical fuel reduction" occurrences.

We do not support any of the Alternatives as defined in the text.

We would support a revised Alternative 4 if the emphasis were on non-native fuels reduction and not on the removal of healthy native plants and if there were a strong follow-up weed management strategy. The mechanical fuel reduction methods would have to be limited to mowing, using weed removal hand tools and herbicides for serious infestations in controlled circumstances by approved applicators. The cut material would be removed to a site where it could be composted safely. This revised Alternative 4 would contain a strong program by Park and Fire jurisdictions to create mountain development fire ordinances and regulations with the various bodies governing land use in the Santa Monica Mountains to place restrictions on construction and landscaping (as discussed previously in this letter).

Fire management in SMMNRA has to emphasize the protection of the natural resources first. That is why SMMNRA was created.

The human part of this ecosystem has at least an equal responsibility to help protect the health and future of habitats that add to their property values, integrate the mountain slopes in patterns of beauty and conserve water for everyone's use.

Please send all notices and other documents relating to the Fire Management Plan to me at the above address.

Thank you.

Sincerely,  
Betsey Landis  
President  
Los Angeles/Santa Monica Mountains Chapter  
California Native Plant Society



**PACIFIC PALISADES COMMUNITY COUNCIL**

*The Eyes, Ears, and Voice of the Pacific Palisades Community  
Serving the residents and businesses of Pacific Palisades since 1973  
Post Office Box 1131, Pacific Palisades, California 90272*

September 15, 2004

Woody Smeck, Superintendent  
National Park Service  
Santa Monica Mountains National Recreation Area (SMMNRA)  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360-4207

Subject: Comments re SMMNRA Fire Management Plan Draft EIS

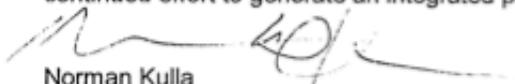
Dear Mr. Smeck:

I am writing on behalf of the Pacific Palisades Community Council (PPCC), a nonprofit organization formed 32 years ago to be a forum for community issues, and, to be an advocate for the Pacific Palisades to government and private agencies upon those issues where there is broad community agreement.

Wildfire Research Network (WRN) has shared with the PPCC its research and analysis of the SMMNRA Fire Management Plan Draft EIS. After consideration, we support the NPS recommendation of Alternative 2 as the appropriate strategy for the new Fire Management Plan.

We share WRN's concern that the criteria used to select candidate areas for Strategic Fuel Modification (fig. 3-20, p. 3-34) does not take into account the impact of brush areas upwind of vulnerable inhabited areas. The most destructive fires that occur in the Santa Mountains, in terms of cumulative acreage burned and homes/structures destroyed are fires exacerbated by Santa Ana winds. As WRN points out, Santa Ana wind driven fires can quickly sweep through corridors from ignition origins several miles distant. In the 1978 Mandeville Canyon, 1993 Old Topanga and 1976 Kanan fires flames traveled six miles in eight hours, six miles in four and one-quarter hours, and thirteen miles in two hours, respectively. It is well documented that this phenomena can occur even where the brush is considerably less than 35 years old. The areas to the north and east of Palisades as well as inland of Topanga/Malibu coastline are such areas of concern.

PPCC joins with WRN to encourage the ongoing NPS coordination with other ownerships and fire agencies responsible for fire prevention and suppression in the SMMNRA and continued effort to generate an integrated plan for the whole area.

  
Norman Kulla  
Chair

cc: Chief William R. Bamattre, LAFD  
Chief P. Michael Freeman, LACoFD

[www.pp90272.org](http://www.pp90272.org)

PACIFIC PALISADES RESIDENTS ASSOCIATION, INC.

POST OFFICE BOX 617  
PACIFIC PALISADES  
CALIFORNIA 90272  
(310) 454-4254



September 14, 2004

National Park System  
Superintendent Woody Smeck, SMMNRA  
401 W. Hillcrest Drive  
Thousand Oaks, CA 91360-4207

Re: Draft EIS Fire Management Plan, SMMNRA

Pacific Palisades Residents Association, a community-wide voluntary planning and environment organization, supports selection of Alternative 2 as the appropriate strategy for the new SMMNRA Fire Management Plan.

PPRA is concerned that the criteria used to select candidate areas for Strategic Fuel Modification do not give weight to some brush areas upwind of very vulnerable inhabited areas. Santa Ana winds can drive fires quickly down these wind corridors to homes several miles from ignition sources. In the 1978 Mandeville Canyon fire, the 1993 Old Topanga fire and the 1996 Calabasas fire flames traveled from deep inland to the coast in eight, four and two hours respectively. It is well documented that this phenomenon can occur even where the brush is considerably less than 35 years old. Examples of areas of concern in this respect are:

- \* north and east of Pacific Palisades,
- \* inland from the Malibu coastline.

The board of PPRA appreciates the detailed technical information presented throughout the Draft EIS. We encourage ongoing NPS coordination with the ownerships and fire agencies responsible for fire prevention and suppression in the SMMNRA. We urge continued efforts to generate an integrated plan for the whole area. We note that the proposed plan, however excellent it is, covers only 15 percent of the land area of SMMNRA.

Sincerely Yours,

A handwritten signature in cursive script that reads "Frances Tibbits".

Frances Tibbits, Corresponding Secretary

cc: Los Angeles City Fire Chief William Bamattre  
200 No. Main St. , 18<sup>th</sup> Floor, Los Angeles CA 90012

Input 12

Wildfire Research Network  
415 S. Topanga Canyon Blvd. #190 Topanga CA 90290  
(310)289-2128 wildfireresearch@yahoo.com

Woody Smeck, Superintendent  
National Park Service  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360-4207

September 15, 2004

Subject: Comments re: SMMNRA Fire Management Plan Draft EIS

Wildfire Research Network is a nonprofit research organization dedicated to developing and sharing information on the phenomena, dynamics and costs of controlling wildfires while meeting long term environmental and safe urban development objectives.

WRN supports the NPS recommendation of Alternative 2 as the appropriate strategy for the new SMMNRA Fire Management Plan and appreciates the detailed technical information presented throughout the document.

We are concerned that the criteria used to select candidate areas for Strategic Fuel Modification ( fig. 3-20, p.3-34) do not give preferences to brush areas upwind of fire vulnerable inhabited areas. The most destructive fires that occur in the Santa Monica mountains, in terms of cumulative acreage burned and homes/structures destroyed, are fires driven by Santa Ana winds. These fires can quickly sweep through corridors from ignition origins several miles distant. In the '78 Mandeville Canyon '93 Old Topanga and '78 Kanan fires flames traveled from deep inland to the coast in 8, 4, and 2 hours respectively. It is well documented that these phenomena can occur even when brush is considerably less than 35 years old. Examples of areas of concern are:

- North and east of Pacific Palisades
- Inland of Topanga/Malibu coastline

WRN encourages the ongoing NPS coordination with other ownerships and fire agencies responsible for fire prevention and suppression in the SMMNRA and continued effort to generate and integrated plan for the whole area.

Wildfire Research Network

  
R. L. Cavage, President

cc: Chief P. Michael Freeman , LA County Fire Department

Input 13

**Stephanie Wilson Blanc**

1000 El Medio Avenue, Pacific Palisades, CA 90272 FAX 310-454-4310 PHONE 310-459-3131

2004 SEP 16 1 09 PM

National Park Service  
401 W. Hillcrest Drive  
Thousand Oaks, CA 91360  
Attn: Fire Management Plan comments

Sept. 14, 2004

Dear NPS:

1. I am a fifth generation native of California and a resident of Los Angeles. My family has grown up in the Los Angeles area for four generations. It is with great sadness I have watched the natural landscape disappear from our basin. I have had first hand experience here with untrammled land and freely flowing streams and rivers. With that knowledge comes a respect for the power and beauty of our relatively natural wild lands. The promise of the Santa Monica Mountain's protection as a park wilderness has been some comfort to me and many other like me. I have held the hope that we would hold on to a small portion of the remaining essential wild California both for future generations to enjoy and for its intrinsic value of its own sentient self. Where is it written that we should be able to endanger entire systems? What I do not understand is: why you are planning to destroy more of what little remains in order to save it?
2. I have read your 'Draft Environmental Impact Statement Fire Management Plan' [FMP] and attended one of your public meetings. I am responding accordingly. Although there is a great deal of brilliant analysis within your FMP, your conclusions show that the analysis was either not followed and/ or patently ignored. Why is that?
3. My critiques follows from the research contained there in, in particular:
  - a. Currently the Santa Monica Mountains have endured more frequent burning due to human hands.
  - b. Much of our grasslands is actually type converted from frequent burning and therein lays the danger of more burning or mechanical fuel reduction.
  - c. Grasslands are easily
    1. burned
    2. invaded by exotics that are exceeding flammable and disrupt the natural ecosystem and
    3. penetrated by humans, the #1 cause of fires by far.
  - d. Young chaparral and degraded ecosystems burn as easily as old-growth chaparral.

### Input 13 continued

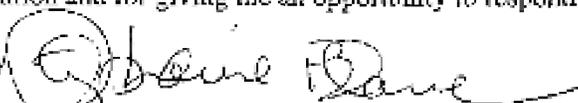
4. It is my understanding that the NPS is mandated to both protect the natural resources and manage wild fire risk. Your policy choice in the FMP of Preferred Alternative 2 [page 2-18] is a betrayal of your mandate. How is it that preferred alternative 2 was chosen while you have a mandated mission as steward of our wild parkland?
5. Where have you shown that follow up mitigation will happen after many acres of wild parkland are destroyed unnaturally, annually?
6. What is to prevent type conversion of these ancient Elfin Forests [The California Chaparral, an Elfin Forest by W. S. Head] to flammable grasslands?
7. It is tantamount to fact that there is less than little funding for mitigation work. It is obvious to all that once these lands are destroyed there will be little or no follow through. In fact there may be little or no money to even keep the highly flammable fuel mowed once sections of these Elfin forests are destroyed. Do you realize that in fact that you are putting forth a policy that will lay yet another fuse for yet another man made fire?
8. Do you understand that any roads leading to these Elfin forests will add to the potential of fire? There is a direct correlation between built roads and the occurrence of fire.
9. Using 'equipment' to gain access to interior park areas to 'reduce the biomass' there will ultimately have a worse effect than the 'adverse effect' caused by repeated burns. Equipment destroys the integrity of the fragile ecosystem from the mycorrhizal fungi, soil structure, and seedbed to more macro concerns of soil stability, and watershed. Do you understand this, and if you do why are you proposing to use equipment?
10. While you freely admit that your studies are incomplete or non existent for the insects populations of these Elfin Forests you are all too willing to destroy large tracts in a highly un natural manner [FMP: 'not consider if not studied']. Do you understand that we are in a great global pollinator crisis?
11. If the European bee population were to fail, and this is a possibility; wouldn't you all look quite ignorant and careless to be the cause of endangering our native bee population?
12. Do you understand that many of our native bees provide the same pollinating services as European Honeybees?
13. What do you understand at a global level of the pollinator crises?
14. Do you think that we live independently, apart from the entire issue of pollination?
15. Can we live without one or two or more native insects that quite possibly make their homes in the communities you plan to destroy?
16. Are you aware of the great effort and cost it took to re establish the El Segundo blue butterfly?
17. What was the cost?
18. Can you [we] afford the cost?
19. Where do you show you understanding of the arthropod community?
20. Where is the time and funding for 2-22? How is it moral that if something is not understood it can be destroyed?

Input 13 continued

21. In 2-21 you state that additional research and monitoring should be undertaken to further understand the relationship between fire and habitat fragmentation. How can this be done when you have already set your priority to implement preferred alternative 2? Where do you show that you understand that you may be dooming communities of plants and animals?
22. Although you state in 2-19 that mitigation actions should be taken, your policy choice of preferred alternative 2 will perpetuate the problem of fragmentation of wild lands. Are you aware of this?
23. How do you know whether your policy of preferred alternative 2 will be the last reed in the precipitating a total failure of many life forms?
24. You state in the text of the FMP, 2-27, that inappropriately sited development creates a fire safety hazard and a degraded environment. Why have you failed to address this problem in your proposal?
25. Why are you not working towards co-operation with all the different Santa Monica Mountains landowners and managers as mandated [FMP - 2-27]? [See below #s 27 & 28]
26. It is my observation that in mandated fire clearance all the Eucalyptus, Acacias, Pines, and Pampas grass, etc. are regularly SPARED from clearing. Meanwhile the chaparral -with a few species exception- is regularly cut down. These priorities make no sense. Where are the guidelines regarding invasive and highly flammable exotics in adjacent wild lands?
27. Why are you not leading the crusade for the eventual elimination of the above invasive plants, which are ever so, fire like? [See Temescal Canyon for instance where the ancient chaparral has been cleared and a forest of Pampas, Eucalyptus, Palms, etc has remained and increased at an alarming rate].
28. Since humans are the greatest cause of fire, more effort needs to be spent on the problems they create. With your mandate of preservation you are in the best and most unique position to effect change and lead others to more sensitive solutions. In all areas of our fires the call is now for coalition building, not for posing enemies and polarization. Of course, the enemy is not NPS, chaparral, nor ignorant people. There are solutions to living in our wild lands - but these solutions are not found in you proposed mechanical fuel reduction or in burning areas of our Elfin forests. It is frightening that you would actually consider preferred alternative 2 a workable solution. This is a crazy idea. Burn this idea up or mechanically tear it out of your heart. Work with established concerned groups, like the Native Plant Society, botanical gardens, Xerces society, California Exotic Pest Plant Council, etc. and bring about healing change for all involved. Follow your own research. BELIEVE ME THIS IS TRULY YOUR MANDATE.

Thank you for your attention and for giving me an opportunity to respond.

Sincerely,



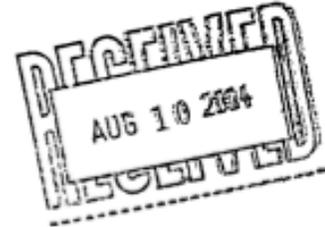
Stephanie Blanc

Input 14

August 1, 2004

To: Woody Smeck, Superintendent  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360-4207

From: Don P. Mullally *Don P. Mullally*  
10418 Gothic Avenue  
Granada Hills, CA 91344



Subject: Fire Management Plan.  
Information and suggestions for use in the DEIS of this plan in 2004 for the  
Santa Monica Mountains National Recreation Area *4 pp.*

Apparently your staff knows all about wildfires, wrote a DEIS and has three versions of it ready for public scrutiny and comments. Since I am not familiar with your area and problems, I will not pass judgment on any part of it.

I have endeavored to gather information based on observations I have made on wildfires in the Santa Susana Mountains, particularly the Santa Clarita Woodlands Park. You may wish to adopt some of my material.

1. Vegetation in public wilderness parks should not be surrendered to wildfires. Except for land, forests, plants and plant communities, and wildlife are their primary assets. Being carefully selected and costly areas, the parks deserve protection as much as any other type of property.
2. In the event of fire, early detection is imperative. Too often fires go undetected or unreported until they are too large for quick suppression.
3. Fast suppression is imperative. Water bearing aircraft may be unavailable or slow to arrive. Too much time is also required to put fire fighting crews and heavy equipment on the line. Fast response by aircraft seems to be the best answer.
4. When outside fire departments arrive at a fire, park employees should stress the park status of the land and emphasize the need for superior fire control. The departments are apt to linger on the edges of a burn and watch the fire grow and move, as they commonly do on undeveloped land.
5. In this fire-prone region, useful wide fire roads are imperative. Men and equipment are not likely to enter burning or not-yet burning vegetation if such roads are not present. Roads are needed for both ingress and egress if dangerous conditions develop. Ideally, roads should have two ends and be open at each end. Parklands should be boxed in on all sides by roads. Very large parks also need one or two other roads in their central areas. Roads can also serve as park trails.

## Input 14 continued

Weather permitting, canyons and other areas between roads can be expected to burn if fire is not stopped at a road. Roads should be made soon, not five or ten years from now. Peripheral roads are also valuable for preventing park fires from invading private property and developments.

6. The destructiveness of fires is often magnified by remote backfires ignited by helicopters bearing flammable chemicals. The intense heat locally generated by burning chemicals combined with burning vegetation can practically sterilize the ground. Few native herbs and crown sprouting trees and shrubs seem to appear after the rains commence.

Extreme sudden heat and flames may lead to the nearly complete incineration of vegetation on mountain ridges and major parts of watersheds. Don't expect the survival of pockets of vegetation that can be useful to wildlife in the post-fire period for food and cover, and to the burned vegetation for propagules. Natural burning fires tend to leave unburned patches behind them. Unburned patches may even save locally scarce species from local extinction.

7. Accurate vegetation mapping is imperative in wilderness parks. If the park department knows where the rarest, most useful and scenic types are, they can advise fire departments as to their locations and request special measures for their protection. Some vegetation types are abundant and not special, and they are more expendable. In fact, some require occasional fire.
8. Wetlands, and particularly the riparian zones bordering them, are prone to severe damage from wildfires. Damages come from burning dead plant material on the ground and from highly heated air. The simplest form of fire protection of riparian zones is manual removal of dead fallen logs, limbs, branches, logjams, roots, and brush. When these materials burn close to living tree trunks and saplings, they kill them outright or set them afire close to ground level. Many trees die and eventually fall, and many others are left with fire scars open to decay and the next fire. Riparian fires burn rather slowly, but the damage gets done.

Removing brush from the outer edges of the riparian zone is also useful. However, this is expensive, slow, time-consuming work that may be considered harmful to the ecology and general appearance of the environment. Watering down borders during fires can be very helpful, but roads must be present for the task to be performed.

9. Trees of all sizes of Southern California black walnut, Flowering ash, California bay laurel, Western sycamore, Mexican elderberry, alder, Fremont and Black cottonwood, and the willows are especially susceptible to fires. All of these trees are important in riparian zones, and some are restricted to it. They are our deciduous trees. Even low fires in thickly growing tall grasses and short shrubs, particularly stands, usually kill tree trunks. Immediately after the fire, trees may appear to be OK, but are actually dead above ground level. Within six months,

## Input 14 continued

most of these produce multiple stems (alder and cottonwoods excepted) that will eventually become sizeable tree trunks. However multiple trunks will never achieve the size of single trunks. Dead trunks serve woodpeckers for a time, eventually fall and serve invertebrates, lizards, rodents, etc. However, they are also fuel for future fires.

To prevent kill-back of these trees, crews of forest or fire workers need to manually remove dead grasses, wood, and shrubs around tree trunks. A 2-3 foot clear zone is recommended.

Valley oak may or may not qualify for the above treatment. Of the oak trees, this species is most susceptible to trunk injury from fire. Nor does it crown sprout except as sapling size. Surface roots, broken roots, and scars are ignited; fire internalizes in the trunks, and the trees frequently die or fail. Hot fires even kill cambrium and phloem in trunks and limbs

10. In my opinion, thick growth of dead stalks of the non-native or alien tall grasses is, from the standpoint of fire, the most dangerous vegetation in the hills of Los Angeles and neighboring counties. The dead vegetation ignites easily; spreads fire rapidly, is fanned by breezes across open ground, and soon transmits fire to other types of vegetation, particularly chaparral and coastal sage scrub. Flames then become higher and hotter.

To kill seeds and minimize the height of grasses, mechanical mowing or broad expanses in late March or April is recommended. Otherwise, when dry cut plants down along roads, major trails, and use areas. The less of it around the better. Flammable associated plants include the mustards, milk thistle, yellow star thistle, wild lettuce, and other alien annual plants.

11. Woodland chaparral, a vegetation type frequently forming a thin shrub understory in oak forest and woodland, is not highly inflammable. I have witnessed fire crews cutting poison oak, royon, redberry, snowberry, and seedlings beneath oaks, but I don't recommend the practice.
12. Fire crews should include an advisor who recognizes major species of trees and shrubs. Advisors can prevent the cutting of seedlings and saplings of particularly valuable trees, trees that are the hope of the future. During the Santa Susana fire of October 25 to November 2, 2003, sapling size Valley oaks were needlessly cut off. Some crown sprouted during 2004.
13. My observations indicate that it is generally preferable to put out fires in parks rather than magnify them with backfires. Brushy parks are not places for fire departments to experiment by using helicopters to start remote backfires, enlarging fires, creating infernos, burning up natural vegetation to get rid of fuel loads. Controlled burns are very useful in conifer forests, but we don't have these on the hills of southern California. Fire departments love to set backfires along

## Input 14 continued

roads and trails, and some of these may be useful. Others are a waste of time, work, and money. During the 2003 fire in the Santa Susana Mountains, vegetation along the summit road on the north side of Oat Mountain was ignited by backfiring in an effort to burn-out vegetation down slope. A storm was coming, humidity was rising, and a mile of backfire went out on its own where started beside the road.

A helicopter set a backfire on a ridge leading to the crest of the mountain range and the Orcutt Ranch. Largely due to the change in weather the fire went out quickly and did no good.

Even though the fire was going out on its own, another plan was in motion to burn out the eastern parts of the Santa Clarita Woodlands Park, an area largely forested in East, Weldon, and Learning Canyons. Late one afternoon a helicopter bearing the inflammables was already in the air. I happened to arrive on the scene and talked to the top brass of the fire departments congregated at a site about the harmfulness of the operation. As a result, the canyon was not ignited, and it now serves as the best recreational area of the park and the whole area. What a relief it was to find the canyons green and hardly touched by fire the next morning!

One argument for burning East Canyon was to eliminate fuel that could lead to fire jumping Highways 14 and 5 and entering wilderness to the east. It happened that on or about July 20-21, 2004, a new wildfire broke out east of Highway 14 that incinerated Elsmere, Placerita, and Whitney Canyons and a large wilderness area serving as mitigation for a housing development. Burning out East Canyon in 2003 would have been a tremendous waste and would have done not any good at all.

Cc: Senator Barbara Boxer  
    Senator Diana Feinstein

Input 15



Pamela Palmer  
<ppalmer@artecho.com  
>  
09/15/2004 01:20 PM  
MST

To: samo\_fire@nps.gov  
cc:  
Subject: Revision of policy for management of Santa Monica Mountain  
Recreation Area

National Park Service  
401 W. Hillcrest Drive  
Thousand Oaks, CA 91360  
Attn: Fire Management Plan comments  
Sept. 15, 2004

Re: Possible Revisions in your policy for management of the wildlands  
in your jurisdiction

Dear National Park Service,

I am deeply concerned that stated changes in management of the  
wildlands in your jurisdiction will adversely effect the Santa Monica  
Mountains National Recreation Area. There are many complex issues  
involved, with possible irreversible ramifications for the Santa Monica  
Mountains.

Current studies show that reasonable clearing of 100 ft. at the  
wild/urban interface provides very nearly as much protection from  
wildland fires as would clearing much farther from structures, or as  
would clearing additional acres in interior parkland to reduce fuel  
volume. Defensible space around homes must be maintained to be  
fire-safe - but that is all we need. Let's use the LEAST INTRUSIVE  
methods to combat the risk of fire, without destroying a very sensitive  
ecosystem that has been set aside as a wildlife habitat and a place  
where we can interact with the wildlife we have protected. Let's use  
measures that will help ensure that the Santa Monica Mountains National  
Recreation Area will continue to be a refuge for wildlife in a strong  
plant community and will remain so for generations to come, as, I  
believe is a goal of the National Park Service.

I am a Licensed Landscape Architect for the State of California and, as  
such, am a steward of this land. I feel that how this land is managed  
is of utmost importance to the health of our delicate environment. I  
feel strongly that any change in the management of the wildlands of the  
Santa Monica Mountains National Recreation Area should be a matter of  
Public Vote.

Sincerely,  
Pamela Palmer, Landscape Architect  
ARTECHO Landscape Architecture  
1639 Electric Avenue, Suite A  
Venice, CA 90291

by e-mail  
**RECEIVED**  
SEP 15 2004  
SMMNRA-8540



Ronald L. Rindge  
160 E. Street  
Cayucos, CA 93430

August 2, 2004

Woody Smeck, Superintendent  
National Park Service, SMMNRA  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360-4207

RE: Fire Management Plan

Dear Mr. Smeck:

In reviewing the extensive Draft Fire Management Plan, I now realize that it pertains only to NPS properties in the SMMNRA. My comments which follow are relevant primarily to the L. A. County Fire Department, with whom NPS must necessarily coordinate all fire related issues in the SMMNRA. Accordingly, I request that the copy of this letter and its attachments be sent to the appropriate authority within the L. A. County Fire Department who is working closely with you to insure: **1. Public safety and, 2. Firefighter safety and fire repression water resources.**

**Public Safety**

Most citizens do not realize how fast a wildfire can move and endanger them if they are in the path of the fire and can quickly be trapped. The ever-increasing visitor count in the SMMNRA – on roads, in campgrounds and in parks, and on back-county trail systems – is the major public safety concern. Judicious and prudent closing of these areas at times of high fire danger is the primary responsibility of all agencies involved in fire management in the SMMNRA. On November 9, 1972, in an oral presentation at a meeting of the Malibu Historical Society, I expressed the following concerns, which are more serious now than thirty two years ago:

**Population Density-(partial extract):**

**The need is great to provide emergency evacuation of and medical care for injured or sick persons, not only during the "off season", but more pressing during those days when the traffic in the community is at a standstill. Add the threat of a major fire on a peak traffic day and visions of catastrophic loss quickly come to mind. If the danger to the general public is such that even one life is lost because of this congestion, the County and State (and NPS) may be forced to control the ingress to the community by coordinated traffic-count stations set up around the perimeter of the Malibu (SMMNRA) area on those days when just about everyone seems to be trying get into Malibu (SMMNRA).**

(Extracted from pages 10 and 11 of 14 pages of talk by RLR, 11-9-1972).

Enclosed are copies of pgs. 10 & 11 of my 11-9-72 report which include the above quote.

**Firefighter Safety and Fire Suppression Water Resources:**

Water is a fireman's best friend in fighting fires, especially if he has no water resource and a wildfire is threatening to entrap him and other people or cause major property loss. **THERE IS AN AQUIFER HOLDING 10 MILLION GALLONS OF WATER IN THE CENTER OF THE SMMNRA! The fully silted reservoir behind the Rindge Dam in Malibu Canyon contained 574 acre feet of water when constructed in 1924. During the last 80 years, this reservoir has filled up with rock and silt as a result of building Malibu Canyon Road (1940-1952), building of the Ventura Freeway, fires denuding the land in the upper watershed and massive land developments adjacent to Las Virgenes Canyon and Creek. Now, the naked eye sees no water at all on the surface, ONLY ALLUVIAL DEPOSITS HIDING THE 10 MILLION GALLONS OF WATER STARTING A FEW FEET BELOW THE VISIBLE SURFACE.**

Accordingly, I recommend the following actions to tap this aquifer and bring the water to concrete holding tanks where it can be used by firefighters:

1. Install a high-volume submersible pump and well about 5-10 feet below the top of the aquifer at a point about 30 feet north of the top of the dam.
2. Construct piping from the submersible pump to concrete water storage tanks above the dam and out of public view off the west side of Malibu Canyon Road. There is a depression in the landscape there that should serve this purpose very well.
3. Establish strict access to this water resource site under the control and direction of the L. A. County Fire Department as the lead agency in this part of the SMMNRA. The public need not have access to this vital, life-saving resource put there for the sole purpose of fire suppression if and when the need arises.

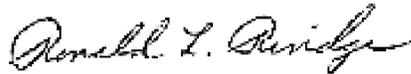
Pumper units could refill tanks without driving north or south on Malibu Canyon Road to existing fire hydrants. This would save precious time during a fast moving fire and the fuel costs to laboriously move heavy, water-laden tanker trucks up Malibu Canyon Road from PCH to get closer to hot spots in the middle of the SMMNRA.

These thoughts were conveyed to the Army Corps of Engineers in my letter of June 11, 2002 (Addendum No. 2, items 1 & 2) which suggested this alternate use of the Rindge Dam and Reservoir. A copy of this two-page letter is attached with the portions relevant to harnessing 10 million gallons in the middle of the SMMNRA being highlighted. I have had no response from the Army Corps of Engineers or the State Parks Department who have been conducting extensive and costly studies on the Rindge Dam and reservoir for many years. I fear that this suggestion never got to fire officials for further study. It is my opinion these actions would benefit public safety and facilitate fire repression efforts on the part of fire agencies if the will to do so is activated.

Input 16 continued

As for funding, I would hope those controlling the purse strings of government spending would consider this action to improve public safety a higher priority for the human species than the millions being spent on phantom fish in the upper Malibu Canyon watershed. I respectfully request the NPS forward the second copy of this letter and attachments to the appropriate authoritative person in the L. A. County Fire Department working with NPS on a coordinated fire management plan for the SMMNRA.

Sincerely,



Ronald L. Rindge  
Phone and FAX (805)995-3609

Enclosures: Pages 10 & 11 from Nov. 9, 1972 oral report to Malibu Historical Society.  
Two-page letter to Army Corps of Engineers dated June 11, 2002.

P.S. Has it been decided when to close back-country trails or any other parts of the SMMNRA this fire season which appears to be coming earlier than usual because of drought conditions?

## Input 16 continued

less displacement of terrain plus would have the advantage of preserving and opening up many vistas not otherwise available through a freeway network. Detailed studies on these concepts would be necessary, but it seems probable that a high-capacity, more efficient people-moving rail or monorail system would be better than a freeway.

In any event, when the people count pouring into the Malibu area on any system of roads or rails exceeds logical limits, control over entry will have to be established.

5. Population Density: If the above concepts were realized, population density in Malibu for residents and recreational visitors alike would be greater, thus allowing a better utilization of the area in satisfying the needs of ~~the~~ Southern California, <sup>W.S.</sup> ~~area~~. However, short of an integrated land use plan and some interim mass-transit system, it appears Malibu is near saturation levels, not so much because of increasing year-round residents, but because of the overload on the area caused by recreational-minded visitors. The overload is critical as it is strangling the community on weekends and summer months, thus making it imprudent to expand the resident population much more until the needs of both the resident and transient populations have been provided for.

Los Angeles County and State governmental units need to move quickly to solve these problems or it is possible that serious loss to persons and property could occur because of inadequate safety precautions and security services. The need is great to provide emergency evacuation of and medical care for injured or sick persons

June 11, 2002

U. S. Army Corps of Engineers  
Los Angeles District  
911 Wilshire Boulevard  
P. O. Box 532711  
Los Angeles, CA 90053

Certified Mail  
Return Receipt No.  
7000 1530 0004 1837 5945

RE: Addendum No. 2 to record of public input commenced at public hearing of May 29, 2002:  
**Alternative uses of Rindge Dam and Reservoir.**

Attention: Mr. Jason Shea

Dear Mr. Shea:

This letter is added input to my previous letters dated May 25, 2002 and June 7, 2002, relevant to your Feasibility Study on the Rindge Dam. I request your study include, investigate and report on the following alternative uses, other than "No Action", of the Rindge Dam and Reservoir, a multi-million dollar asset of citizens and taxpayers:

**Alternative uses of Rindge Dam and Reservoir in order of priority:**

1. **Fire repression:** Install a submersible pump in the aquifer behind the dam, which holds more than 10 million gallons of water. Pump the water to a low profile concrete water tank on the west side of Malibu Canyon Road across from the old Sheriff's Honor Camp site. Fire trucks could refill with water at this mid-mountain location, rather than have to laboriously and inefficiently drive out of the mountains to refill at times of wild fires, or when public water service in the Las Virgenes or District 29 systems are inoperative for any reason. The public water supply could be cutoff by earthquakes, landslides, landslippage, ruptures of mains or cutoff of water from agencies serving District 29. This would provide an alternate source of water for fire repression using the aquifer as the secondary source. This alternate system using additional tanks, mains and hydrants could be expanded to serve areas such as Sweetwater Mesa, Malibu Knolls, Serra Retreat and the entire Malibu delta including Malibu Colony. The L. A. County Fire Department, the City of Malibu, State Parks, the National Park Service and the Army Corps of Engineers and any others who are responsible for public safety in the SMMNRA should evaluate this alternative.
2. **Safety zone:** An additional benefit of Proposal 1 above, would be to create a safety zone for persons stranded or isolated on Malibu Canyon Road at times of fire in the same area as the low profile water tank. A small fireproof blockhouse could also be placed here to serve as a haven during a passing fire. Being on the west side of Malibu Canyon Road and substantially hidden from passing traffic, the beauty of the vistas in the area would not be impaired. Access to this safe zone with water storage would be controlled by L. A. County Fire in cooperation with Sheriff, State Parks and National Park Service personnel. The intent is not to make it a visitor's area, but only as an emergency safety zone if and when needed. Accordingly, it would be opened rarely, only as critical circumstances warranted.

3. **Partial rehabilitation of dam and reservoir:** Remove twenty feet of sediment behind the dam, partially restoring reservoir capacity for flood control. Install "flashboards" at spillway intake leaving a three to five foot opening between the lowest board and the top of the spillway. This would allow a slower release of floodwaters, if and when available reservoir capacity filled up to the brink of the spillway. The excess drainage from the upper watershed would back-up behind the flashboards thereby alleviating the danger of a flash flood. A screening structure or device would be installed around the intake area to divert large debris that might clog the aperture between the spillway and the lowest flashboard. Most flash floods occur in a matter of a few hours. This use would protect the lower watershed from most flash flooding, depending on the severity and duration of a winter storm. Flashboards are not high-tech but they can do the job at low cost. Spillway gates, if considered absolutely necessary, could be installed but at a much higher cost. Geological testing would be important to determine if the removal of twenty feet of sediment would endanger the toe of the slope of Malibu Canyon Road. Current laws relevant to altering wetlands or aquifers would need to be considered. L. A. County Flood Control should be invited to comment on this alternative.
  
4. **Scenic overlook:** The Rindge Dam and reservoir were important factors in the settlement of the lower watershed. Thousands of such dams were involved in the settlement of America. This dam symbolically represents the last historic expansion of the continental United States ending at the Pacific in the Santa Monica Mountains National Recreation Area. A scenic overlook should be built at the site of the old Sheriff's Honor Camp. Low-to-the-ground interpretive signs would inform the visitor of the history of the area, including: geologic formation; use by the Chumash as their "trail to the sea" (Century Ranch site to Humaliwa); the Sublette/Grizzly Bear encounter in 1853; the dam as related to agriculture and the settlement of Malibu; the Adamson House as a National and State historic landmark; the building of Malibu Canyon Road by the honor prisoners of the L.A. County Sheriff's Department (which opened on July 3, 1952); possibly including the story of the "Pink Lady" of the 1960's and ending with the acquisition of this beautiful canyon by the State of California. This alternative would highlight the cultural significance of the area so close to millions of people in the greater Los Angeles area.

This concept is consistent with California Assembly Bill AB 1070, which designated Malibu Canyon Road as a State Scenic Highway, effective January 1, 2002. Fran Pavley, Assemblywoman for the 41st District, should be consulted on this matter. This is also consistent with the National Park Service proposal to operate a shuttle bus system for visitors to the SMMNRA. Acting Superintendent of the NPS, Woody Smeck, should also be contacted for the views of the National Park Service on this proposal.

As requested above, please enter these alternatives into the public record for your Feasibility Study on the Rindge Dam.

Sincerely,

Ronald L. Rindge, Taxpayer

cc: Assemblywoman Fran Pavley  
Woody Smeck, NPS  
Distribution A



Ronald L. Rindge  
160 E. Street  
Cayucos, CA 93430

August 10, 2004

Woody Smeck, Superintendent  
National Park Service  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360-4207

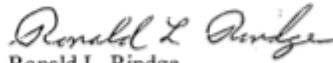
RE: Fire Management in SMMNRA – Water Resources

Dear Mr. Smeck:

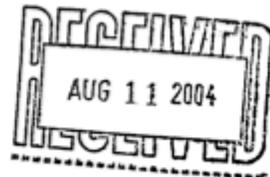
Enclosed is an article about two new 420,000-gallon water storage tanks being installed in Templeton, San Luis Obispo County. Each tank is made of welded steel and measures 24-feet high by 50-feet diameter. Also noted that this two-tank project cost \$490,000, of which a FEMA grant paid 90%.

I send this article along to you, Marty O'Toole and others involved in fire management in the event NPS, State Parks, Los Angeles County Fire or Ventura County Fire ever have a water storage project for the SMMNRA to evaluate. The Templeton Community Service District would have very current information on this type of storage tank as well as the funding procedure through FEMA

Sincerely,

  
Ronald L. Rindge

Enclosure: Article, "New water tanks on line", *San Luis Obispo County Tribune*, August 8, 2004, page B-1.



TRIBUNE B-1

AUG 8, 2004

TEMPLETON COMMUNITY SERVICES DISTRICT

# New water tanks on line

By ANGELA MANESE-LEE  
THE TRIBUNE

Water began pouring Friday into two 420,000-gallon water storage tanks in Templeton. The new welded tanks replace a pair damaged in the San Simeon Earthquake.

When they are operational next week, the tanks will bring the community's water storage capacity back up to 2.7 million gallons.

Since December, Templeton has made do with 1.86 million gallons stored in two other tanks that sustained only minor earthquake damage, said Bill Van Orden, the Templeton Community Services District general manager. Those two were constructed in the 1990s after seismic requirements were put into effect.

The damaged tanks were built before those requirements were in place, in 1960 and 1970. When the earthquake hit Tem-

The two storage tanks replace a pair damaged in the San Simeon Earthquake and will bring capacity back to 2.7 million gallons

pleton, the Lincoln Street neighborhood took the brunt of the damage. Three of Templeton's four tanks sit on College Hill, at the end of Lincoln Street.

"One tank was a bolted tank and, as a result of the shock, the bolts split," Van Orden said. "It had to be taken down immediately because it was leaking in a number of places, and 420,000 gallons of water obviously could do significant damage if it all went at one time."

The second tank sustained irreparable internal damage. Because the tank was not bolted down, the water within it was lifted up with the power of the shock. When it dropped, the force of the water

caused the tank to bulge out at the sides, Van Orden explained.

The two 24-foot high, 50-foot diameter replacement tanks are constructed of welded steel and were anchored to a concrete slab to hold them down, said a spokesman for Paso Robles Tank, the firm that built them.

A FEMA grant covered 90 percent of the \$450,000 project. The services district paid the remaining 10 percent.

Since December, the district has limited water usage by urging residents to conserve and installing restrictors to construction water meters, Van Orden said.

With the new tanks in place, Van Orden said he did not expect usage to increase.

## Input 18



jean public  
<jeanpublic@yahoo.com>

06/25/2004 02:47 PM  
MST

To: samo\_fire@nps.gov  
cc: rodney.frelinghuysen@mail.house.gov  
Subject: public comment on fed register of 6/16/04 vol 69 no 115 page 33655

us doi nps -

the first alternative is to stop allowing so many HOMES to be built in this fire prone area. make the land free from homes/buildings that can burn up. stop letting builders develop.

no burning at all should be done with alleged "controls". air particulates poison people, causing genetic malformations, asthma in children, heart attacks and lung cancer. such alleged controlled burning kills people, birds and wildlife.

i thoroughly oppose burning and polluting our air. i want epidemiologists and medical doctors consulted whenever any alleged "controlled" burning is contemplated.

b. sachau  
15 elm st  
florham park nj 07932

maybe if the park service gets sued for bad health from people in the area they will stop using this unhealthful activity.

---

Do you Yahoo!?  
Yahoo! Mail is new and improved - Check it out!  
[http://promotions.yahoo.com/new\\_mail](http://promotions.yahoo.com/new_mail)



## Input 20

It is obvious that within the Santa Monica Mountains National Recreation Area that there are numerous homes and their occupants currently at risk from a catastrophic wildland fire. The risk is due to the proximity of these homes to accumulations of hazardous (flammable) wild land fuels. Many of these homes are adjacent to the federal lands. The families living in these homes rarely have the subject matter background to recognize the risk. The local fire departments do recognize the risk. The executive and legislative branches of the federal government also recognize the risk and fund a fire program for this recreation area. This fire program is directed to mitigate the hazard. All those that are employed to mitigate this hazard and are responsible recognize that reducing hazardous fuels reduces fire intensities. Fire intensities reduced adjacent to these values at risk dramatically improves protection during these reoccurring fires. The anticipated path of these catastrophic fires is accurately anticipated by fire behavior analysts. By appropriate planning and implementation of hazard fuel reductions much can be done to improve protection in the local wildland urban interface. The Biswell Symposium: Fire Issues and Solutions in Urban Interface and Wildland Ecosystems 1994

The preferred alternative (2) contained within this Environmental Impact Statement with its limits and constraints on implementing fuels treatments will do nothing to improve the safety of the home owner and fire fighter. The authors of this EIS are much more concerned with the possibility of natural resource impairment attached to fuel management activities than the well being of the parks neighbors and firefighters. This prioritizing of their perceptions of ecosystem health or appearances is done in spite of the directive given to agency fire management programs to prioritize public and fire fighter safety (NPS Directors Order 18). Homes and their occupants have a higher value than any risk to bushes. Responsible land managers recognize that social values have more importance than any limited (total acres) impact to environmental values. Due to inexperience or bias the authors fail to recognize that any real impairment of resources that might be a result of fuel management practices is easily mitigated by simple restoration in the field and significant large scale impacts are not substantiated by data. Statistically valid data collected over time shows a much more resilient chaparral ecosystem than represented in the text of this document. The authors selected data and embellished on any possible literature to support the perception that fuel management has an unacceptable or negative impact on the environment. To support their bias data showing positive ecosystem responses (habitat enhancement & increased biodiversity) attached to fuels management has been excluded from consideration in this document.

Direction is provided by federal and state policies and legal codes. The local potential and historical precedent for an extremely hazardous fire environment is obvious. In spite of the risk, the preferred analysis of this EIS does nothing to improve protection or assist the interagency suppression community in the challenge of improving safety and reducing loss.

## Input 20 continued

Federal agencies are governed by the National Environmental Protection Act. The purposes of this Act is to declare a national policy which will *encourage productive and enjoyable harmony between man and his environment*; to promote efforts which will prevent or eliminate damage to the environment and biosphere and *stimulate the health and welfare of man*; to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and *promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans*. Attain the widest range of beneficial uses of the environment *without degradation, risk to health or safety, or other undesirable and unintended consequences; achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities*. The National Environmental Protection Act recognizes the need to protect the social values. Again responsible people prioritized health and safety. The authors of this EIS seem oblivious to the risk.

Land managers especially in this wildland urban environment have been instructed to use the National Fire Plan & Federal Fire Policy when creating a fire management plan. (Objective II pg 1-5). Important portions of the policy that do not fit the agenda or bias of the authors have been excluded. Significant portions of the policy that have been excluded are “*adopt an operational role in the wildland/urban interface that includes wildland firefighting, hazard fuels reduction, cooperative prevention and education, and technical assistance. Identify and fund, on a cost-share basis, high-priority fuels management activities on Federal lands adjacent to wildland/urban interface areas identified through a fire protection assessment process that considers relative values to be protected. These activities may involve adjacent non-Federal lands.*”

This document attempts to deceive the reader by including the goals 1, 2, 4 & 5 outlined on page 1-4. These goals are not met with the preferred alternative. This Park unit receives substantial staffing and funding to implement these goals and expand on the wildland & urban interface fuel reduction program. The positions currently staffed are to be primarily dedicated to the planning, management and monitoring of wildland interface fuel reduction treatments. Using the provided WUII funding on restoration projects while ignoring homes at risk is certainly a misuse. (see Wildland Fire Management Appropriation Fund 85 Budget Structure).

Historically the local fire protection agencies have encouraged and cooperated with this park unit in a broad spectrum of WUII and hazard fuel reduction projects. This agency is directed to establish and maintain collaborative efforts for fuel reductions with these protection agencies. These fire departments cooperate by providing expertise in the planning phase, labor to prepare the treatment area and provide much of the operational requirements for implementing and accomplishing the projects. Cooperative efforts between agencies on fuel reduction treatments with adequate planning would dramatically improve protection to many of the local communities (Westlake, Oak Park,

## Input 20 continued

Agoura, Malibu, Topanga, Pacific Palisades and Beverly Hills) adjacent to the recreation area. The preferred alternative ignores the protection needs of these communities. The analysis used to determine suitable strategic fuel treatments in this document does not adequately consider social values at risk (human safety and property). See figure 3-18 on pg 3-32. The analysis uses the constraints of percent slope and fuels aged 35 years + (This document emphasizes a shorter fire return interval). These constraints exclude a large percentage of the homes at risk. To truly prioritize safety communities at risk and their relationship to hazardous fuels should be used. (20 years + in mixed chaparral and 10 years + in coastal sage) Also position of the values on the slope (fuels down slope from the value to be protected are more at risk) should be used.

An Environmental Analysis is stated as necessary for strategic treatments with the preferred alternative. An EA is required for small treatments in spite of the Categorical Exclusion provided. With the values at risk it is negligence that this CAT EX would not be utilized locally. Key portions of the text are as follows.

### **Department of the Interior**

#### **National Environmental Policy Act**

#### **Determination Needed for Fire Management Activities; Categorical**

**Exclusions; Notice** Department of the Interior give notice of revised procedures for implementing the National Environmental Policy Act (NEPA) and Council on Environmental Quality (CEQ) regulations. Department of the Interior Manual 516

DM, Chapter 2, Appendix 1, which describe categorical exclusions, i.e., categories of actions, which do not individually or cumulatively have a significant effect on the human environment and therefore normally do not require further analysis in either an environmental assessment or an environmental impact statement. The revision adds two such categories of actions to the agencies' NEPA procedures: (1) Hazardous fuels reduction activities; and (2) rehabilitation activities for lands and infrastructure impacted by fires or fire suppression. The agency has conducted a review of peer reviewed scientific literature identifying the effects of hazardous fuels reduction activities, which is available at <http://www.fs.fed.us/emc/hfi>. This combination of reviews give the agency confidence that the categorical exclusions are appropriately defined. These two categorical exclusions will facilitate scientifically sound, efficient, and timely planning and decision making for the treatment of hazardous fuels and rehabilitation of areas so as to reduce risks to communities and the environment caused by severe fires

## Input 20 continued

The preferred alternative also does not allow for additional establishment of defensible space or mechanical fuel treatments at the interface. This EIS specifies that the 86.2 acres currently treated will not be expanded upon. On pg. 2-15 “there will be no need to expand the zone of mechanical fuel modification.” No home by home assessment has been made or is planned to be made of mechanical treatment needs at numerous sites on table 2-3. The occupants of these neglected homes and those that serve and protect are placed at risk. The decision criterion for strategic fuel modification projects (pg 3-37 to 3-39) attempts to deceive the reader. Figure 3-32 Decision Model for Strategic Fuel Modification Projects. Site specific hazard mitigation is not defined but additional mechanical treatments are not an option. (pg 2-15) Again safety is not prioritized.

Numerous advantages to areas of young, reduced fuels are disregarded. In spite of claims stated within this EIS it is obvious to those in the field that an age mosaic of fuels creates species diversity and increased native populations. A strategy for a fire management plan should be to separate older more flammable accumulations of wild land fuels from urban areas with areas of younger less flammable fuels. This would reduce the intensity of the flame front at the urban interface due to the fact that fuels accumulate with age. This reduced intensity dramatically improves safety. Have the authors ever worked on a fire line? Younger fuels also have a reduced rate of fire spread allowing additional time for the evacuation of residents. This reduced rate of spread allows suppression resources more time to position themselves at homes in advance of the fire. Often times even with defensible space established, adjacent older fuel beds release sufficient radiant or convective energy to endanger homes and people. Other advantages to fuel reductions strategically located are to reduce the flying burning embers that land within urban areas in advance of a flaming front. Fires are most often contained and suppression costs reduced in areas of young and reduced fuels. Air craft and ground based resources such as wild land engines and hand crews (these are available in significant numbers in this area) would be effective in managing the cooler less intense fire backing on the flanks of a wind drive Santa Ana incident. Reduced fuels often reduce the area burned exposing less homes and/or communities to the catastrophic fire.

The preferred alternative in this EIS creates deliberate obstacles to both creating defensible space around individual homes and creating strategic treatment areas that would improve protection for communities. This fire management strategy with its lack of acres treated and disregard for funding provided to treat acres is in effect utilizing fuels as a weapon against urban areas and the families that live there.

During a wildland fire, the suppression resources assigned to the incident react and attempt to protect as the public expects of them. This EIS exhibits a callous disinterest in the well being of the firefighter. The preferred alternative effectively exposes these civil servants that are employed to protect the social values to unnecessary hazards.

I base the above comments on 30 years of employment experience with federal land management agencies. My employment experience was as a wild land firefighter,

Input 20 continued

firefighter supervisor, forestry technician (fuels management) and I am currently a prescribed fire technician. In this position I oversee and manage the recreation areas fuel management program. This position primarily creates and maintains the separation between homes and the hazardous fuels. I have extensive experience on the fire line where I observe the fire environment, fire behavior and their relationship to the neighboring homes.

Charlie Whitman 9/13/2004

Input 21

National Park Service  
401 W. Hillcrest Dr.  
Thousand Oaks, CA 91360  
Attn: Fire Management Plan comments

2004 SEP 14 10:07 AM  
FBI  
Sept. 10, 2004

Dear NPS:

1. I am a resident of Los Angeles who values and enjoys the native beauty and health of the ecosystem in the Santa Monica Mountains National Recreation Area. I recognize that as a US citizen, these are my lands, and I am here speaking out for their protection and preservation at the same time that human lives and homes are protected from wildfires at the wild/urban interface.
2. I understand that the NPS has a dual mandate - to accomplish BOTH of these goals. Wildland fire management objectives are to be DERIVED FROM natural resource management plans. NPS must not make policy contrary to this charge – to do so would betray the trust of the American people, who delegate to NPS this responsibility. NPS must not sacrifice the objective of preserving the viability of the ecosystem to accomplish the objective of reducing fire-risk.
3. I am aware of the NPS FMP Preferred Alternative 2, which includes Suppression, Mechanical Fuel Reduction, Strategic Fuels Treatment, and Ecological Prescribed Fire. This alternative, and these practices can irreparably fragment, degrade, and damage our native environment, until it is gradually type-converted to an exotic landscape. Many species, plant and animal communities, and ecological processes (the importance of which are still unmeasured) can be lost. See guidelines specified by NEPA, CNPS, and your instructions from Reference Manual -18 to 'use least intrusive and least resource-damaging methods to manage wildland fire'. See also the supporting data compiled by the expert botanists, ecologists, and wildfire specialists of this DRAFT FMP. The alternatives presented do not state that the NPS will comply with these standards and recommendations.
4. **ALTERNATIVE 2 CONTERMANDS THE MANDATE, AND FIRST OPERATIONAL POLICY OF DIRECTOR'S ORDER #18: 'TO PROTECT PARK RESOURCES AND NATURAL ECOLOGICAL PROCESSES'**. In point of fact, the NPS, in drafting this proposed FMP, has replaced this goal (which is in DO # 18, the second highest goal (after protecting firefighter and public safety) with the goal to: 'reduce fire hazards..' Considering that chaparral and coastal sage scrub plant communities are inherently highly flammable, this stated intention of the NPS, displays the one-sided, negative view of the ecosystem that drives NPS policy-making.

Input 21 continued

5. Why does the NPS not adopt the most expert findings of the California Native Plant Society (CNPS Botanical Survey Guidelines)?
6. Why does the NPS disregard the conservation ethics expressed in *The Future of California Floristics and Systematics: Collecting Guidelines and Documentation Techniques*, by Ferren, W.R., Jr., D.L. Magney, and T.A. Scholans, 1995?
7. How does the FMP integrate the mission goals of the General Management Plan for the SMMNRA?
8. Have Botanical Surveys been conducted in the areas considered for Strategic Fuel Modification?
9. What factors, besides the output of the computer-modeling program, will be used to designate Strategic Treatment Areas?
10. How will the viability of species, plant and animal communities, and ecological processes be assessed?
11. How will environmental, cost/benefit, and risk/benefit analyses be made, before a Strategic Treatment Project is authorized?
12. Can the NPS fund post-fuels treatment rehabilitation as required in the NPS Reference Manual –18?
13. It is understandable, if only because the occurrence of fires has increased beyond a natural level, that the existing policy of Landscape Mosaic Prescribed Burning (Alternative 1) is out-dated. NPS also recognizes that periodic burning can invite weed invasion, leading to type-conversion. Why then, propose additional prescribed burns in Alternatives 2 and 3?
14. Using 'equipment' to gain access to interior park areas, and to 'reduce the biomass' there, will have greater adverse effects than the 'adverse' effects caused by repeated burns. Natural fire is an integral and necessary part of rejuvenation in our ecosystem. In healthy ecosystem, it has no truly adverse effects. But the proposed mechanical disturbances in our fragile mountain environment, would initiate a chain of events that could not be controlled: the soil structure and seedbed would be lost; the land would be vulnerable to weeds, erosion and instability, run-off would accumulate, and watershed flows would be exacerbated and unpredictable. Species composition would change, and

## Input 21 continued

15. What evidence does NPS have of the resilience of the ecosystem to the measures it proposes?

16. Would it not be wise and responsible to leave intact the untrammled areas that are the last places these species, communities and processes can exist in their own balance, and to keep them whole and healthy?

17. While we understand environmental changes to occur naturally, we would not be the cause of them, in this last bit of native environment in two highly populated counties. Does the NPS understand and validate this environmental ethic?

18. It is the natural environment that provides sanctuary for the human soul; we would not see it violated, or traded, for a very slightly improved chance of our own safety during a fire, when properly maintaining defensible space around our homes, and proven fire suppression techniques have been shown to provide sufficient protection.

19. It is not sensible to create staging areas that will fragment and endanger the ecosystem, for the eventuality of fighting a fire which may not even occur close to that area, when staging areas could be made in optimal locations if and when necessary, during a fire event.

20. To bulldoze into the heart of the ecosystem, and remove 'fuel', when the courses of fires are largely unpredictable, is counter to our priorities and values. We would only cause damage when there is an immediate and clear threat to our lives. In the final analysis, we can evacuate, and we can rebuild, but the land could never recover from these proposed management practices. The character and integrity of our personal natural world - one reason we choose to live here - could be irretrievably lost.

21. I think the FMP should reflect the willingness and preparedness of the NPS, to assume the role of stewardship of the SMMNRA with which it is entrusted. Nowhere does the plan state that the NPS will be responsible for measures to restore areas that

Input 21 continued

**[1] The impacts on non-native species from strategic fuels reduction are unknown and will need to be evaluated with project specific environmental analysis.**

**[2] Benefits would occur on a landscape level if the technique were successful in limiting the amount of area burned, thereby increasing the fire rotation interval with more effective control of fire spread.**

**[3] Adverse impacts to the areas of treated vegetation would be expected from either mechanical clearing or a high frequency prescribed fire return interval.**

23. These statements clearly show that the NPS cannot and will not be responsible for the consequences of the measures it intends to implement. It will not even define its own decision-making process.

24. The NPS FMP admits that environmental impacts, of unknown magnitude, are expected; and 'benefits' may not occur. The 'benefits' referred to are 1) an increase in fire rotation intervals, and 2) the ability to more effectively control the spread of a wildfire. It is correct to predict these benefits may not occur, because it has been shown that young chaparral, and degraded ecosystems burn as readily as old-growth chaparral. Fire rotational intervals cannot be ascribed just to age of vegetation. Furthermore, reducing some acres of 'fuel' slows down a fire only when there is little or no wind – which is not typically the case in our environment during fire season. Would prescribed burns be done in the Spring – the time most damaging to the ecosystem?

25. To claim that the adverse effects from mechanically 'treating' vegetation, and from burning vegetation are equivalent, or that one impact is as bad as another, is disastrously erroneous, irresponsible, and foolhardy. Broad-stroke wishful thinking like this has no place in today's environmental policy-making. Heavy-handed programs like this haven't successfully preserved ecosystems anywhere. Site-by-site analysis and careful hand work is required for any and all projects.

26. With what little native landscape remains to us, and our growing population increasingly in need of, and appreciative of wilderness, will NPS put the environment's inestimable value before NPS's own management convenience, and do less, rather than more fuel reduction?

27. Would it not be wiser to wait until studies are done, rather than 'not consider if not studied'? To limit what one will consider, when crucial data is missing that can be had; to deliberately destroy what one wants to preserve; to prematurely formulate policy that one knows can do unforeseen damage to oneself – surely this demonstrates the first definition of stupidity. To impose such decisions on everyone else is unconscionable.

28. Does NPS have the right to risk depriving future generations of our natural heritage in designated National Park land, without public consensus?

Input 21 continued

29. Alternative 4, which calls for fuel reduction only around existing homes would be an acceptable policy, if 1) it were to state the distance from the flammable structure to undisturbed wildland to be no more than 100 ft. (greater distances have not been shown to significantly reduce fire-risk to structures), and 2) if it were to state that each site would be knowledgeably and sensitively managed to preserve and enhance the health and well-being of that environment in a fire-safe way.

30. Will the NPS include in the FMP a description of the goal-state of the ecosystem in their charge? This should recognize the free and dynamic health the ecosystem has, and how NPS, through its FMP, will enable this entity to thrive with integrity.

31. Interior parklands are the last refuge for the declining pollinator base of our region. Will herbicides and pesticides be used?

32. Will NPS be responsible for restoration, revegetation, and monitoring of impacted areas? How will the native seedbed be replaced?

33. What will be done to prevent erosion and resulting soil loss? What measures will control run-off? How will mass movement be prevented?

34. Will exotic species be introduced?

35. Will discing be used? Will trails and roads be made? Will they become available for off-road vehicle use? Will these areas be opened to organized recreational opportunities?

36. Does the US Government have future goals that this policy may facilitate? Like drilling for gas or oil in the SMMNRC, or introducing exotic plants for harvesting? Or development?

37. Will Eucalyptus and Pine be removed?

38. What will be done to prevent the spread of weeds and invasive exotic plants?

39. How does the cost of the proposed FMP compare with the cost of super-scooper helicopters?

Thank you for your attention to these concerns.

Sincerely,

*Karen Clower*  
818 874 9503

Input 22



"Mary Pelletier"  
<mkpell@earthlink.net>  
09/15/2004 10:25 PM  
MST

To: <samo\_fire@nps.gov>  
cc:  
Subject: Possibly Spam: letter to NPS

*by e-mail*  
**RECEIVED**  
SEP 15 2004  
SMMNRA-8540

National Park Service

401 W. Hillcrest Dr.

Thousand Oaks, CA 91360

Attn: Fire Management Plan comments

Sept. 15, 2004

Dear NPS:

1. I am a resident of Los Angeles who values and enjoys the native beauty and health of the ecosystem in the Santa Monica Mountains National Recreation Area. I recognize that as a US citizen, these are my lands, and I am here speaking out for their protection and preservation at the same time that human lives and homes are protected from wildfires at the wild/urban interface.
2. I understand that the NPS has a dual mandate - to accomplish BOTH of these goals. Wildland fire management objectives are to be DERIVED FROM natural resource management plans. NPS must not make policy contrary to this charge – to do so would betray the trust of the American people, who delegate to NPS this responsibility. NPS must not sacrifice the objective of preserving the viability of the ecosystem to accomplish the objective of reducing fire-risk.
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## Input 22 continued

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## Input 22 continued

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15. What evidence does NPS have of the resilience of the ecosystem to the measures it proposes?

16. Would it not be wise and responsible to leave intact the untrammelled areas that are the last places these species, communities and processes can exist in their own balance, and to keep them whole and healthy?

17. While we understand environmental changes to occur naturally, we would not be the cause of them, in this last bit of native environment in two highly populated counties. Does the NPS understand and validate this environmental ethic?

18. It is the natural environment that provides sanctuary for the human soul; we would not see it violated, or traded, for a very slightly improved chance of our own safety during a fire, when properly maintaining defensible space around our homes, and proven fire suppression techniques have been shown to provide sufficient protection.

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Thank you for your attention to these concerns.

Yours truly,

Mary K. Pelletier

660 Brooktree Road

Santa Monica CA 90402

Input 23

National Park Service  
401 W. Hillcrest Dr.  
Thousand Oaks, CA 91360  
Attn: Fire Management Plan comments

2004 SEP 16 1 01  
FBI  
Sept. 13, 2004

Dear NPS:

1. I am a native Californian and resident of Los Angeles who values and enjoys the native beauty and health of the ecosystem in the Santa Monica Mountains National Recreation Area. I recognize that as a US citizen, these are my lands, and I am here speaking out for their protection and preservation at the same time that human lives and homes are protected from wildfires at the wild/urban interface.

2. I understand that the NPS has a dual mandate - to accomplish BOTH of these goals. Wildland fire management objectives are to be DERIVED FROM natural resource management plans. NPS must not make policy contrary to this charge - to do so would betray the trust of the American people, who delegate to NPS this responsibility. NPS must not sacrifice the objective of preserving the viability of the ecosystem to accomplish the objective of reducing fire-risk.

3. I am aware of the NPS FMP Preferred Alternative 2, which includes Suppression, Mechanical Fuel Reduction, Strategic Fuels Treatment, and Ecological Prescribed Fire. This alternative, and these practices can irreparably fragment, degrade, and damage our native environment, until it is gradually type-converted to an exotic landscape. Many species, plant and animal communities, and ecological processes (the importance of which are still unmeasured) can be lost. See guidelines specified by NEPA, CNPS, and your instructions from Reference Manual -18 to 'use least intrusive and least resource-damaging methods to manage wildland fire'. See also the supporting data compiled by the expert botanists, ecologists, and wildfire specialists of this DRAFT FMP. The alternatives presented do not state that the NPS will comply with these standards and recommendations.

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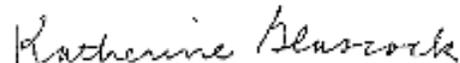
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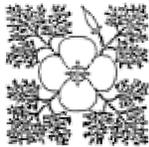
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Thank you for your attention to these concerns.

Sincerely,



Katherine Glascock  
4503 Radford Avenue  
Studio City, CA 91607-4136



FRANCES E. KNIGHT & ASSOCIATES LANDSCAPE ARCHITECTURE  
1386 MONUMENT ST. PACIFIC PALISADES, CALIFORNIA 90272 310 454-6746

SEP 16 10 31 AM '04

National Park Service  
401 W. Hillcrest Dr.  
Thousand Oaks, CA 91360  
Attn: Fire Management Plan comments

Sept. 10, 2004

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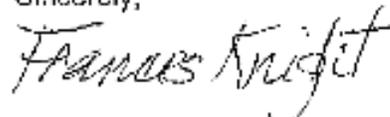
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Thank you for your attention to these concerns.

Sincerely,



## *Santa Monica Mountains National Recreation Area Response to Input*

- 1) It is acknowledged that a permit may be required for any activity that may impact waters of the United States by way of fill material or construction equipment.
- 2) If only air quality impacts are considered, then the use of prescribed fire may produce a higher level of air pollutants than mechanical treatments. However projects must consider the relative impacts and benefits of a particular treatment method on the entire range of environmental factors affecting a particular project. Some beneficial fire effects can not be duplicated by mechanical treatment e.g. generation of a postfire nutrient pulse, germination stimulation of native species, weed seed kill etc. Mechanical treatments may have adverse impacts that would not occur as readily with prescribed fire e.g. soil disturbance on steep slopes, promotion of weed spread, etc. All proposed prescribed burn projects are subject to rigorous scrutiny of air quality impacts and no project would move forward unless it meets all local air quality standards.
- 3) Alternative 2 includes the analysis of mechanical fuel modification for strategic fuel reduction. Alternative 2 states that strategic fuel modification may be accomplished by either prescribed fire OR mechanical methods. The choice would depend on the result of a required environmental review, including air quality effects. All ecological prescribed burns are analyzed for air quality impacts and alternatives to meet the ecological objectives are considered, including mechanical fuel reduction. Alternative 4 does analyze a mechanical fuel modification only alternative that was rejected as an environmentally inferior alternative (p. 4-86).
- 4) Air quality impacts of other criteria pollutants for each alternative are given in the following summary table.

TREATMENTS	Pounds of Emissions				
	PM10	PM2.5	CO	VOCS	NOX
ALTERNATIVE 1 Landscape Mosaic Burning	1,028	720	9,967	451	159
ALTERNATIVE 2 Strategic Prescribed Burning	103	72	997	45	16
ALTERNATIVE 2, 3 Ecological Prescribed Burning	7	5	69	3	1
ALL ALTERNATIVES Wildfire suppression 10 acres	3	2	28	1	0.4
ALL ALTERNATIVES Wildfire suppression 110 acres	286	199	2,768	125	44
ALL ALTERNATIVES Wildfire suppression 10,000 acres	2,856	1,999	27,681	1,252	441

- 5) See response #3. Strategic fuels treatments may utilize either prescribed fire OR mechanical fuel modification. We concur that Alternative 4 minimizes air quality impacts, however see response #2.
- 6) Alternative 2 already incorporates mechanical fuel modification as a technique for strategic fuels reduction. Ecological prescribed burning is meant for those circumstances when alternative methods such as mechanical means do not allow ecological objectives to be met or is environmentally inferior when all environmental factors in addition to air quality are considered. Also, see response #3.
- 7) Mitigation measures to reduce smoke emissions will be considered for any prescribed burn project as part of the park's NEPA/NHPA environmental review that is required for any project in the park.
- 8) Alternative 6 considered creating a landscape mosaic of different fuel loads using mechanical methods rather than prescribed burning. It was analogous to Alternative 1 (no action) that proposed treating 4500 acres throughout the park with prescribed fire over a five-year period. This alternative was rejected from further analysis because it is inconsistent with NPS policy to protect the significant scenic, recreational and natural resources that the SMMNRA was established to protect. Problems with the alternative include: 1) degradation of plant and animal habitats, 2) ineffectiveness to prevent large scale fires (see analysis of Alternative 1, Chapter 4). See the analysis of impacts of Alternative 4 (Chapter 4) which analyzed the impacts of mechanical fuel modification on <100 acres in the urban interface zone, within previously degraded habitat areas and compare that with the anticipated impacts of treating 4500 acres/5 years in pristine habitat areas.
- 9) See response #4. For conformity see Air Quality section, p. 3-112.
- 10) Chapter 4, Section IV, A1f (Rare, Threatened and Endangered Species-Animals) and Chapter 4, Section IV, A3 (Water Resources and Wetlands) identifies potential impacts to steelhead and steelhead habitat associated with specific treatments under each alternative. The environmentally preferred alternative (Alternative #2) avoids adverse impacts which may occur in Alternative 1 (no action). The only action for which specific impacts to steelhead populations can not be identified is strategic fuels modification. Because physical geographic locations remain to be identified, it is not possible to determine if there is any potential to affect steelhead or steelhead habitat. Therefore all strategic fuel reduction projects will be subjected to environmental analysis where all potential adverse impacts will be evaluated, including those to steelhead trout. The decision model for all strategic fuels projects (Figure 3-23), rejects projects that could adversely affect sensitive species such as steelhead trout. The mitigation matrix listed in Table 2-6 (Chapter 2, Section VI) additionally states our intent to avoid direct operational and fuel modification impacts to water resources and wetlands during wildfires.

- 11) We have noted that Section 7 consultation is required for adoption of plan in Chapter 1.VII.
- 12) There are no plans for prescribed burns in endangered wildlife habitat as there is no evidence that fire is required to enhance any rare and endangered wildlife species at this time.
- 13) Weed abatement is annual mowing or disking of herbaceous vegetation dominated by non-native annual grasses and forbs. Brush clearance is fuel reduction in vegetation dominated by native shrubs. These definitions have been incorporated into the definition of Mechanical Fuel Reduction in Chapter 2, Section II - Terminology.
- 14) We concur that a Resource Advisor be present at the Incident Command Post and in the field.
- 15) Landscape level fuel modification means reducing biomass in locations that may be remote from identified values at risk, but are strategic locations that would limit fire spread, protect identified values at risk, or allow control of a fire perimeter. Site specific hazard mitigation is the use of strategies that can be employed on the site of identified values at risk to reduce wildfire hazard, e.g structural resistance, brush clearance. This information has been added to the text describing the strategic fuel modification decision model (p. 3-37).
- 16) The plan is not trying to identify a specific landscape era. The general resource objectives are to increase or maintain native plant biodiversity, increase native plant cover and minimize cover and adverse impacts of non-native species.
- 17) Giant coreopsis (*Coreopsis gigantea*) has no state or federal status as a sensitive species.
- 18) We have added the Sycamore House at Point Mugu State Park to the list of structures potentially eligible for the National Register.
- 19) We recognize that Boney Mountain is a State Wilderness Area.
- 20) Incident Command Center is changed to Incident Command Post in the Mitigation Matrix (Table 2-6).
- 21) The authority to close park units is delegated to the Superintendent pursuant to Title 36 Code of Federal Regulations Part 1, Section 1.5(a) Closures and Public Use Limits and Section 1.7(a) Public Notices.
- 22) We have added the 1996 prescribed burn conducted adjacent to Las Virgenes Road by California State Parks as an example of a fire that is believed to have had a significant influence in the direction of the Calabasas Wildfire Incident in 1996. Post-simulator studies were conducted by Ishmael Messer, former fire management officer for the SMMNRA displayed

that the prescribed burn assisted firefighting efforts which kept the fire from advancing toward the Malibu Lake community.

- 23) We agree that defensible space is the most effective means to protect life and property in the event of wildfire. The DEIS emphasizes the importance of defensible space through fuel modification; it also emphasizes the responsibility of homeowners to provide and maintain this space. We agree that defensible space contributed to preventing significant losses during the 1996 Calabasas and 2003 Simi/Verdale Fires. Analysis of the 2003 San Diego County fires also identified defensible space as the best predictor of structure survival.
- 24) The DEIS applies only to projects on NPS property or projects funded with federal dollars administered by the NPS. The DEIS preferred alternative recommends the use of defensible space and landscape level fuel modification using either mechanical methods or prescribed fire. We added “biomechanical fuel modification” to include grazing as another method of mechanically reducing biomass.
- 25) The DEIS includes a comprehensive analysis of the fire climate and environment of the Santa Monica Mountains. The recommended alternative includes a full range of fire management actions and the criteria with which to prioritize and evaluate the effectiveness of fire hazard reduction projects. While NPS can only implement actions on its own properties, the analysis is valid for the entire Santa Monica Mountains. See responses #23 and #24.
- 26) See response #98. The decision tree applies only to landscape level strategic fuel modification projects. It does not apply to defensible space projects that are of demonstrated effectiveness. Any fuel modification project proposed for NPS property or using NPS funds requires environmental review in accordance with NEPA. The DEIS applies to actions taken on NPS lands and the NPS mandate under federal law requires that natural resource values be protected after the safety of people and property have been assured. Any project on NPS land will be evaluated for impacts to resources and mitigated to avoid or minimize impacts. The decision tree is an effort to provide a rigorous framework to identify whether a project will be effective in reducing wildfire hazard, threats to public and fire fighter safety, and meet project objectives and to identify environmental impacts against which potential benefits must be weighed.
- 27) The preferred alternative does not conflict with the Goals and Objectives section of the Los Angeles County Pre-fire Management Plan. The DEIS calls for the following management actions (Page 2-3 to 2-4):
  - Complete suppression of wildfires
  - Coordination of vegetation management with local fire agencies to improve the effectiveness of fire suppression activities involving NPS lands
  - Consultation with local fire agencies to protect resources during suppression activities
  - Assessment of wildland fire hazards to people, homes and resources; use public support and education to reduce the associated risks.

- Alternative 2 (preferred alternative): Prescribed burning is used to provide resource enhancement. In addition, hazard fuel reduction projects using prescribed fire or mechanical or bio mechanical fuel reduction are considered in strategic locations that reduce the chance of wildfires which may damage life and property, risk public and fire fighter safety or impact natural and cultural resources. Short-term and site-specific resource impacts of strategic prescribed fires are weighed against long-term and regional hazard fuel reduction benefits. Strategic zones are identified using up-to-date analyses of vegetation types, fuel characteristics, fire spread models, and potential hazards to life, property, and natural and cultural resources. Mechanical fuel reduction is concentrated at the urban interface to protect homes.
- 28) All alternatives, including the preferred alternative incorporate the 9 principles and 17 policies of the 2001 Federal Wildland Fire Management Policy of which firefighter and public safety are the first priority. (Page 1-5, Objective 1).
  - 29) We continue to look forward to more opportunities to collaborate. In response to this letter SMMNRA staff met with Los Angeles County Fire Department representatives to discuss the issues raised in this letter and requested follow-up correspondence to document these discussions.
  - 30) It is acknowledged that a smoke management plan and a burn permit are required from the Ventura County Fire Department. The requirements are found at [www.vacpcd.org](http://www.vacpcd.org).
  - 31) We will incorporate the recommended air quality mitigation measures that offroad diesel-powered equipment not be left idling for more than 5 minutes and that it be maintained in good condition and in proper tune (Table 2-6).
  - 32) Alternative 2, the environmentally preferred alternative, seeks to identify the most effective strategies to protect life and property, while providing explicit criteria to ensure protection of natural resources when considering any fuel modification project located away from the wildland urban interface (Figure 3-23). Alternative 2 is environmentally superior to Alternative 1, the no action alternative. The mitigation matrix (Table 2-6) identifies numerous measures that are designed to reduce the impacts of current practices related to vegetation management.
  - 33) The term “fuel” is used when referring to technical terms related to the flammable characteristics of vegetation e.g. fuel load, live fuel moisture, mechanical fuel modification, live fuels, fuel type. The term “fuel” or “brush” is not substituted when we mean chaparral or coastal sage scrub or vegetation. The vegetation of greatest concern with respect to fire hazard are those vegetation types with the highest fuel load e.g. chaparral, coastal sage scrub, or ornamental trees such as pines and eucalyptus. Fine fuels such as non-native grasses and herbaceous weeds are of concern for their ease of ignition and their ability to rapidly spread fire.
  - 34) The SMMNRA supports removing non-native plants and is working to prevent type conversion of native habitats. The mitigation matrix (Table 2-6, Vegetation) describes mitigation measures to address “fuel modification - loss of native vegetation” and “unnecessary vegetation removal and conversion that degrades habitat without increasing fire safety; fire ignitions” on both NPS lands and on private property inspected by local fire departments. The

SMMNRA encourages enough brush clearance by homeowners and agencies to increase safety for the public and firefighters, but discourages overzealous removal of vegetation that provides no protection benefit and damages the ecosystem.

- 35) The NPS recognizes the stabilizing role of chaparral shrubs on steep slopes (see Section IVA1 Vegetation and Section IV B Geology and Soils) and does not support removal of deep rooted shrubs on steep, erodible slopes. The SMMNRA encourages enough brush clearance by homeowners and agencies to increase safety for the public and firefighters, but discourages overzealous removal of vegetation that provides no protection benefit and damages the ecosystem.
- 36) Figure 3-22 is an effort to point out that when a fuel treatment is effective because wildfire occurs shortly after the treatment while fuel loads were still low, then it is more likely to have an adverse ecological impact because it is more difficult for native vegetation to recover from a short fire return interval. The figure is meant to illustrate the need for caution in evaluating fuel reduction projects and to consider how frequently treatments will need to be repeated to be effective and what the impact on native species will be under an effective treatment return interval. *Ceanothus megacarpus* was used as an example because it is the species for which we have the best data on the effects of short, repeated fire return intervals. The figure does not address biodiversity associated with age although we do point out (Section 3, Fire History) that old chaparral (>79 years) in the Santa Monica Mountains is very rare and should be protected.
- 37) The analysis of alternatives with respect to soils, erosion, and wetlands is in Sections 4A2 and 4A3. The SMMNRA encourages enough brush clearance by homeowners and agencies to increase safety for the public and firefighters, but discourages overzealous removal of vegetation that provides no protection benefit and damages the ecosystem.
- 38) We do not know if there are any strategic fuel modification locations that could help control fire spread during Santa Ana conditions which is why we outlined a process for analyzing whether such locations exist. If potential locations are identified we would use fire behavior modeling to assess the effectiveness of a fuel reduction project to control fire spread at that location. Ignitions are a separate issue from controlling a fire once it has started and spread. Roads in the Santa Monica Mountains are maintained annually to clear flashy fuels from roadsides. The majority of ignitions during Santa Ana wind conditions (and therefore for large fires) are from arson or arcing power lines. Any strategic fuels reduction project would need to comply with NEPA review. If the project were found to have significant environmental impacts it would be rejected and site specific mitigation would be recommended to protect the values at risk identified for the project (Figure 3-23). If the project were determined to be appropriate all impacts would need to be mitigated through the NEPA process.
- 39) Wildfire suppression is common to all alternatives and will occur with any wildfire in the Santa Monica Mountains. The operational impacts of fire suppression have been identified to be significant. The fire management plan has identified mitigation measures to reduce operational impacts to sensitive resources.

- 40) No new fuel modification on NPS properties is anticipated due to new development because Los Angeles and Ventura Counties require new homes to be set back adequately from park-land so that homeowners can perform all required brush clearance on their own properties.
- 41) The DEIS can not change land use policies of the jurisdictions within the national recreation area. The DEIS does provide analysis that might be used by local jurisdictions to affect land use policy related to wildfire safety and habitat conservation.
- 42) The SMMNRA can work on prevention strategies only in partnership with local fire departments, communities, and jurisdictions.
- 43) At this time, only non-native annual grasslands or areas of non-native weed species are proposed for ecological prescribed burns. The SMMNRA is currently studying the fire return interval appropriate for grassland burns, methods to control non-natives in years following burns, and restoration methods for native species re-introductions. The utility of fire for non-native species control is species-specific and does depend on factors such as how long-lived the seed bank is.
- 44) The mitigation matrix lists measures to avoid vegetation impacts in fuel modification zones. The DEIS applies only to actions taken by the SMMNRA on NPS lands. The SMMNRA encourages enough brush clearance by homeowners and agencies to increase safety for the public and firefighters, but discourages overzealous removal of vegetation that provides no protection benefit and damages the ecosystem.
- 45) We acknowledge that CNPS does not support any of the four alternatives. The measures that CNPS has recommended in order to support Alternative 4 (mechanical fuel reduction) have already been incorporated into the DEIS (see Mitigation Matrix – Vegetation, Table 2-6). The other recommendation by CNPS that the SMMNRA “create mountain development fire ordinances and regulations with the various bodies governing land use in the Santa Monica Mountains to place restrictions on construction and landscaping” is not within the scope of authority of the NPS. The SMMNRA can provide data and analysis to local jurisdictions that may assist in their development of fire-safety related ordinances, but cannot itself develop ordinances for local jurisdictions. The SMMNRA has incorporated numerous measures to provide information and education to communities to mitigate fire hazard and minimize environmental impacts (Table 2-6).
- 46) The SMMNRA states that public and firefighter safety are the first priority of the NPS; it also acknowledges that protection of natural resources is an additional mandate.
- 47) We acknowledge the support of Alternative 2, the preferred alternative.
- 48) The DEIS supports in detail the concept that major structural losses are associated with large, Santa Ana wind-driven fires. Most of the fire planning strategy assumes that Santa Ana winds are present as part of the worst-case scenario.
- 49) Figure 3-21 shows areas north and east of Topanga and Pacific Palisades that might be appropriate for strategic fuel modification. Figure 3-20 shows that almost none of these sites are on NPS land.

- 50) None of the four alternatives supports destruction of natural resources. The fire environment analysis did show that the no action alternative (Alternative 1) had the greatest potential to have long term adverse impacts to native plant communities. Alternative 2 was selected as the best alternative to protect and enhance natural resources and to provide the most effective mitigation of wildfire hazards, consistent with natural resource protection (Figure 3-23).
- 51) The selection of Alternative 2 was supported by analysis of individual impact topics (Chapter 4) and summarized in Table 5-1.
- 52) See responses #46, #50, and #51.
- 53) See response #50. Mitigation measures are appropriate to impacts (Table 2-6).
- 54) The DEIS has specifically identified the threat of type conversion and all projects will be analyzed with this potential impact as a primary consideration.
- 55) See Response 53.
- 56) No new roads would be built under any of the alternatives.
- 57) Any fuel modification project would require an evaluation of the relative impacts and benefits of mechanical fuel reduction methods versus prescribed burn treatment methods. If mechanical methods were determined to have greater impacts an alternative method would be selected.
- 58) See response #50. The SMMNRA is working to develop co-operative research proposals to do more intensive surveys of invertebrate populations in the Santa Monica Mountains.
- 59) There is no reason to believe that any of the actions proposed in any of the alternatives could have an effect on a general “pollinator crisis” because of the small scale of the proposed actions relative to the scale of large wildfires. Native pollinators, like other plant and animal species have evolved with periodic large wildfires and must be resilient to fire’s effects to have persisted in this ecosystem.
- 60) See response #50. There is no evidence that any action proposed under the preferred alternative could eliminate a native insect species.
- 61) The cost of habitat restoration for the El Segundo Blue butterfly at LAX (rather than the “re-establishment” of the population) was approximately \$750,000 over three to five years for 200 acres. None of the DEIS alternatives requires habitat restoration for an endangered butterfly species, so ability to pay for this type of habitat restoration is not relevant.
- 62) See responses #58 and #59.
- 63) Lack of adequate information was identified in Table 2-6 for the effects of large wildfires on rare, threatened and endangered species. It is a priority of SMMNRA staff to document fire effects on sensitive populations after major wildfires. Support for this work would come as part of the work of permanent staff and from grants that would be submitted as needed.

There would be adequate information for any project (compared to unpredictable wildfires) because it would have to be reviewed under NEPA for impacts to sensitive species. Impacts to sensitive species would be grounds for rejecting a project (Figure 3-23).

- 64) Implementing alternative 2 in no way impairs the park's ability to study the interactions of wildfire and habitat fragmentation. Lack of adequate information was identified for the interactive effects of habitat fragmentation and large, unpredictable wildfires. The potential for a project to contribute to habitat fragmentation must be evaluated (Figure 3-23) and is grounds for rejecting a project if adverse impacts are identified. See Response 50.
- 65) See response #64.
- 66) See response #50.
- 67) Land use regulation is the authority of local jurisdictions and therefore outside the scope of the NPS. Co-operative efforts with local jurisdictions to reduce land use impacts/ wildfire hazard that do fall within the NPS mandate are identified in Table 2-6 under "Land Use" and "Reduce Risk of Catastrophic Wildfire".
- 68) See response #67.
- 69) Fuel modification standards and annual homeowner inspections are the responsibility of local fire departments. Each of these agencies has fuel modification guidelines that identify which species should be retained or removed. Table 2-6 recommends as mitigation of "unnecessary vegetation removal and conversion that degrades habitat without increasing fire safety" that NPS work with agencies to better educate residents about appropriate fuel medication techniques.
- 70) The NPS has an active program to remove invasive plant species from NPS property. See also Response 69.
- 71) The NPS regularly co-operates with organizations devoted to resource protection.
- 72) NPS acknowledges that the author does not support Alternative 2.
- 73) The SMMNRA states that public and firefighter safety are the first priority of the NPS; it also acknowledges that protection of natural resources is an additional mandate.
- 74) Comments are not in reference to the DEIS.
- 75) The DEIS analysis strongly supports the homeowner fuel modification zone as the most effective means to prevent structure loss and provide for homeowner and firefighter safety. Table 2-6 also recommends mitigation measure to minimize the adverse impacts created by fuel modification zones. The strategic fuel modification zones recommended in Alternative 2 serve a different purpose, i.e. to limit fire spread with the ultimate goal of keeping the final wildfire size smaller or away from identified resources at risk.
- 76) As stated in the DEIS, the goals of the SMMNRA Fire Management Program include protecting the park's natural and cultural resources. The current policy of using prescribed fire

on a landscape basis puts these resources at a greater risk by increasing an already undesirable fire return interval. The proposed approach of treating small, strategic locations with prescribed fire and mechanical fuel reduction to reduce the impacts of wildland fire, when coupled with the principals of defensible space, will protect firefighters and the public. Critical project review that evaluates effectiveness and potential environmental impacts will ensure that resources are protected (Figure 3-23).

- 77) Comments are not in reference to the DEIS. The National Park Service sent a copy of Mr. Rindge's 8/2/04 letter to the Los Angeles County Fire Department.
- 78) See response #67.
- 79) It is acknowledged that no alternative with prescribed burning is supported by the author due to concerns for smoke impacts on human health. All human health impacts from any prescribed burn project will be minimized in consultation with the local air pollution control district and will be described in the burn plan.
- 80) The NPS must consider measures to reduce risk to lives and homes in its Fire Management Program.
- 81) An important goal of the DEIS, once firefighter and public safety have been secured, is to protect the park's natural and cultural resources. Alternative 2 was selected as the best alternative to protect and enhance natural resources and to provide the most effective mitigation of wildfire hazards, consistent with natural resource protection (Figure 3-23).
- 82) The four alternatives considered included the full range of options that would realistically meet the NPS mandates for resource protection and wildfire safety.
- 83) The preferred alternative includes the greatest number of potential actions to provide for protection of residents, firefighters, structure survival, and limits to wildfire spread. The DEIS presents detailed evidence on the characteristics of the fire environment and the best available hazard mitigation strategies. The DEIS analysis shows that the other three alternatives are more limited and/or less effective in meeting the safety objectives of the Fire Management Program than the preferred alternative.
- 84) The DEIS analyzed the potential environmental impacts associated with each alternative as required by NEPA. Identifying the impacts associated with different types of fire management actions on chaparral or other native vegetation does not mean that a higher value has been placed on protecting flora than on the safety of homes and residents. Alternative 2 was selected as the best alternative to provide the most effective mitigation of wildfire hazards, consistent with the resource protection mission of the NPS.
- 85) The environmental analysis of the four alternatives was based on the best and most recent fire data and fire research available for the Santa Monica Mountains and is fully documented by data presented in the text and by supporting literature referenced in Chapter 7. The author does not cite any specific data or publications that would allow us to respond to his assertions that the DEIS analysis is biased or incorrect.
- 86) At this time we do not know the scale of impacts to vegetation (i.e. amount of acreage

affected) from wildfire or fire management practices such as short fire return intervals, cumulative type conversion from fuel modification around homes, or the spread of populations of invasive exotics from fuel breaks. There is no evidence that native plant communities impacted by fire management activities can be “easily mitigated by restoration in the field;” rather there is substantial published evidence that shrubland restoration is difficult, time consuming, and expensive.

- 87) See response #85.
- 88) Alternative 2 provides for fire management that is focused at the wildland urban interface, concentrating on fuel modification and defensible space which has been documented to be the most effective strategy to provide for structure protection and resident and firefighter safety. The DEIS analysis shows that Alternative 2 improves fire safety relative to the no action alternative which has been shown to be both ineffective and infeasible to implement. The DEIS has explicitly identified programs (Table 2-6) and analytical methods to identify projects (p.3-28) to improve fire safety that can be cooperatively carried out with local fire agencies.
- 89) The DEIS recognizes the importance of social values in accordance with NEPA and the NPS’s fire management policy. There is extensive analysis in the DEIS regarding how to effectively minimize wildland fire losses (p. 3-27 to 3-40).
- 90) The DEIS includes all elements of the National Fire Plan and Federal Fire Policy cited by the author in Table 1-1, Objectives II and III. The policy objectives cited as excluded by the author are met with the following strategies identified in the DEIS: 1) Interagency coordination and cooperation to include federal land management agency and agencies with supporting or related programs as full partners in wildland fire management activities and programs, 2) Communication and education support to enhance understanding of the fire management mission for both internal and external audiences, and 3) use vegetation maps, fire history maps and other tools to develop risk assessments, which will identify and prioritize appropriate treatments. Nonetheless, the language suggested by the author will be included in Table 1-1, Objective III.
- 91) The Fire Management Plan goals on page 1-4 are explicit and are supported by the DEIS analysis. Alternative 2 was selected as the best alternative to meet all five goals.
- 92) The DEIS does not identify WUI funding to pay for restoration projects.
- 93) The DEIS fully supports and anticipates co-operative efforts between the fire agencies and NPS to reduce wildfire hazards in local communities. The DEIS provides detailed analysis of the risk to local communities from wildfire (Chapter 3, Section III/Fire Environment).
- 94) The strategic fuels analysis is an example of how locations for strategic fuels projects might be identified. It is a method to determine project priorities because only a small % of the land at risk from wildfire can be treated. The constraints of slope were identified as reasonable operational criteria by David Kerr, former SMMNRA fire management officer. The vegetation criteria were selected to provide the greatest and longest lasting benefit from fuels treatment. Social criteria are incorporated in Figure 3-21 with increased housing density representing higher priority areas. The model can be varied to incorporate any criteria

that might be used to identify locations that would act as effective strategic fuel modification locations for significant social resources.

- 95) The decision model for strategic fuel modification projects (Figure 3-23) misused the term “Environmental Assessment” which was meant in the sense of “environmental review” not in terms of a specific NEPA document. Although there is a categorical exclusion for hazard fuels projects less than 4500 acres, all federally funded projects or projects on federal property must comply with the park’s NEPA requirements. The appropriate language, which will be substituted for “EA” in the text and in Figure 3-23, will be “NEPA and NHPA review and documentation.”
- 96) The amount of acreage for the park’s defensible space was provided by the park’s fire staff with the assumption that the park was already providing all necessary fuel modification on park property to homes that predated the land being acquired for parkland. No increase in fuel modification acreage on parkland from new development was anticipated because new development is required to be sufficiently setback from the park boundary to allow all necessary fuel modification to be done on the private property. The park is beginning a parcel by parcel assessment for a GIS database to determine if any additional fuel modification on park property is required to protect existing homes. When this analysis is completed, any increased acreage required to be treated with mechanical fuel modification on park property will be incorporated into the Fire Management Plan’s annual update with appropriate NEPA compliance.
- 97) See response #15. Site specific fuel modification (mechanical treatment) is specifically identified as alternatives to remote strategic fuels treatments to meet safety objectives.
- 98) It is impossible to create an age mosaic in a landscape dominated by large, wind-driven fires. For example, 37% of the SMMNRA is 11 years old from the two 1993 fires that together burned 55,000 acres. See Figure 3-15 (Fire History: Time Since Fire) to see how the landscape is dominated by large areas of a single age class representing the footprint of the last large fire.
- 99) The DEIS repeatedly identifies the advantages of fuel modification to create defensible space at the WUI.
- 100) The DEIS addresses both the benefits and the impacts of creating defensible space around homes and creating strategic fuel modification areas. The preferred alternative allows the maximum range of fire management options including mechanical fuel reduction and strategic fuels treatments despite their potential impacts. The preferred alternative does require that projects be critically evaluated to determine if they will be effective. This is not an obstacle but a necessary part of responsible fire management planning. For projects on SMMNRA property or supported by NPS funds, environmental review for NEPA compliance is not only necessary but required.
- 101) Firefighter safety is most compromised during large scale, wind-driven fires where hundreds of firefighters from outside the local area are called in to protect poorly sited homes on narrow or remote roads in steep canyons or ridges surrounded by flammable vegetation types. The responsibility for firefighter safety under these circumstances rests with the incident commanders. The preferred alternative supports projects that will mitigate haz-

ards to structures and to firefighters defending them, as well as projects that might have the potential to limit wildfire spread.

- 102) The SMMNRA states that public and firefighter safety are the first priority of the NPS; it also acknowledges that protection of natural resources is an additional mandate.
- 103) None of the four alternatives support destruction of natural resources. The scale of the proposed actions makes it impossible to convert the native environment (~112,000 acres of habitat) to an exotic landscape from actions proposed in the preferred alternative, e.g. mechanical fuel modification of 90 acres/year of the same 90 acres each year and a maximum of 750 acres/5 years of strategic fuel modification with NEPA/NHPA review.
- 104) See response #103. The DEIS analyzed the potential environmental impacts associated with each alternative as required by NEPA. Alternative 2 was selected as the best alternative to provide mitigation of wildfire hazards and resource protection, consistent with the DO-18 goal to “use the least intrusive and resource damaging methods to manage wildland fire” and to “protect park resources and natural ecosystem processes”. The analysis of alternatives was developed by the same “expert botanists, ecologists, and wildfire specialists” that provided the supporting data compiled in the DEIS.
- 105) See response #104.
- 106) The applicability of the CNPS Botanical Survey Guidelines to the DEIS alternatives is unclear.
- 107) The applicability of the conservation ethics described in an article on documentation with voucher specimens for EISs and EAs to the DEIS is unclear.
- 108) See pages 1-13 of the DEIS for its relationship to GMP goals.
- 109) No specific locations have been identified for strategic fuel modification projects. Botanical surveys would be carried out when a project was proposed as part of the NEPA/NHPA compliance process.
- 110) See Response 94 and Figure 3-23. Plant and animal impacts of strategic fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process. Environmental risk/benefit analysis of strategic fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process.
- 111) No restoration/rehabilitation is anticipated with any proposed project action.
- 112) Type conversion is a threat primarily to shrublands such as chaparral and coastal sage scrub. Ecological prescribed burning is proposed only in annual grasslands for restoration to woodlands, native grasslands or shrublands. The potential for type conversion from prescribed burning for strategic fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process. See also response #103.
- 113) The potential for mechanical impacts versus those from prescribed burning for strategic

fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process. See also response #103.

- 114) The potential for ecosystem impacts from strategic fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process. See also response #103.
- 115) Protection of core resources by limiting habitat fragmentation is a specific criterion required to be evaluated for strategic fuel modification projects (Table 3-23).
- 116) The guiding policy of the NPS is to “conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” (National Park Service Organic Act of 1916)
- 117) See response #116.
- 118) See response #115. Guidelines to minimize operational impacts during wildfire suppression are described in the DEIS.
- 119) See response #113.
- 120) See response #111.
- 121) See responses #103 and #104. The preferred alternative was selected by a comprehensive analysis of all expected impacts and all expected benefits. Taking individual statements out of context is inconsistent with the environmental analysis process.
- 122) The environmental analysis was performed in accordance with DO-12, the NPS NEPA handbook.
- 123) The purpose of the strategic fuel modification zones recommended in Alternative 2 is to limit fire spread with the ultimate goal of keeping the final wildfire size smaller or away from identified resources at risk. It is predicated on the existence of landscape features that would make control feasible. Prior to implementing a project, the effectiveness must be demonstrated with fire behavior modeling.
- 124) The impacts of burn season for strategic fuel modification projects would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process.
- 125) See response #113.
- 126) See response #116 and mitigation measures to vegetation (Table 2-6, pages 2-19 - 2-20).
- 127) See response #103. The impacts of any specific strategic fuel modification project would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process.
- 128) See responses #116 and #103.
- 129) The DEIS applies only to actions taken by NPS on SMMNRA property. Stipulating brush

clearance regulations elsewhere is not within the scope of authority of the NPS. The SMMNRA can provide data and analysis to local jurisdictions that may assist in their development of fire-safety related ordinances, but cannot itself develop ordinances for local jurisdictions. The SMMNRA has incorporated numerous measures to provide information and education to communities to mitigate fire hazard and minimize environmental impacts (Table 2-6).

- 130) The plan does not try to identify specific target conditions. The general resource objectives are to increase or maintain native biodiversity, increase native species cover/density and minimize the cover/density and adverse impacts of non-native species.
- 131) Herbicide and pesticide use is not part of any of the proposed actions in Alternative 2. If it were necessary to use any herbicide in conjunction with a fuels project, its use would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process.
- 132) No restoration is anticipated with any proposed project action. Monitoring is required and will be accomplished with all projects.
- 133) No direct impact to the seedbank is anticipated with any proposed project action.
- 134) The scale of the actions proposed in the preferred alternative is not anticipated to cause erosion, soil loss or mass movement. Potential soil impacts would be evaluated when a project was proposed as part of the NEPA/NHPA compliance process.
- 135) General mitigation measures have been proposed to control invasive species introductions (Table 2-6). Project conditions to control invasive species introductions will be required as part of the NEPA/NHPA compliance process for specific projects.
- 136) A portion of the 90 acres of the SMMNRA maintained fuel modification zones are currently disked.
- 137) No roads and trails will be made. No fuel modification areas will be made available to off-road vehicles.
- 138) No actions identified in the preferred alternative would facilitate drilling for gas or oil; would promote introducing exotic plants for harvest; or would facilitate development.
- 139) Eucalyptus and pine trees are removed from park property when it has been determined to be appropriate and as funding is available. The park maintains a list of exotic plant species which it maps and works to control.
- 140) A program designed for the long term management of wildland fire cannot be compared to emergency suppression aircraft.
- 141) SMMNRA will evaluate and monitor all potential impacts to cultural resources in accordance with the mitigation measures described in Table 2-6.
- 142) The NPS agrees that intermix and interface areas increase daily with development into wildland areas and that the problem needs to be addressed. Development is approved by local cities and counties and is outside the scope of authority of the SMMNRA EIS for the

Fire Management Plan. We acknowledge the need for planning departments to incorporate risk from wildland fire as part of the approval process and we would like to encourage and participate in that outcome.

- 143) The FMP EIS emphasizes the severe nature of the wildfire danger to residents of the Santa Monica Mountains (p3-27 to 3-40). Because of the nature of the vegetation and the climate (Chapter 3.III) there is no action that the NPS can take to prevent a large wildfire under Santa Ana wind conditions. We agree that active mitigation measures need to address the intermix and interface. The first line of defense against such a wildfire is for all residents to ensure that their own properties have an adequate fuel modification zone and that their buildings are as structurally resistant to ignition as possible. Alternative 2 allows for fuel modification through mechanical and biological means as well as strategic fuels reduction to address these high hazard areas.
- 144) The FMP EIS has identified both the impacts and benefits of all appropriate fire management actions based on the best information available (Chapter 4). Alternative 2 was selected because it provided the widest range of potential fire management actions. By law, the NPS must consider the potential impacts to park resources from any management action. Strategic fuels reduction requires environmental assessment. Fuels reduction that offers strategic fire control success is supported by the DEIS. Table 3-23 illuminates the environmental review process.. Map 3-19 shows locations with potential for successful strategic fuels reduction. The scope of the DEIS pertains to sites adjacent to NPS property and does not include all the intermix interface within the SMMNRA boundary.
- 145) The NPS is developing a GIS database to identify where development is located adjacent to park boundaries. The annual update of the FMP will address where additional mechanical fuel modification might be necessary along the park boundaries.
- 146) Ecological prescribed fire is not proposed for the purpose of providing hazard fuel reduction, but for the purpose of improving the quality of natural resources. The use of strategic fuel modification is the NPS's explicit effort to identify areas where fire spread might be controlled by selective fuel reduction.
- 147) The NPS concurs that Alternative 2 will best meet the fire management needs of both the Park Service and the Los Angeles City Fire Department.

*Additional Input to Draft SMMNRA Fire Management Plan/EIS*

Input 25



**SANTA YNEZ BAND  
OF MISSION INDIANS  
Tribal Elders Council**

P.O. Box 365  
Santa Ynez, Ca 93460  
(805)886-8448 FAX (805)693-1768  
telders@santaynezchumash.org



December 22, 2004

Woody Smeck, Superintendent  
National Park Service  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360-4207

RE: Draft Environmental Impact Statement  
Fire Management Plan  
Santa Monica Mountains National Recreation Area

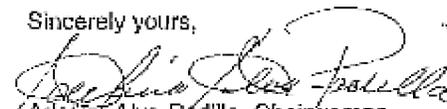
Dear Mr. Smeck:

Thank you for contacting the Tribal Elders Council with the Santa Ynez Band of Mission Indians in regards to the above mentioned project.

Preserving our culture is of the utmost importance to the Elders in addition to the Tribe as a whole. While we understand the need for and are in support of the Fire Management Plan, we are concerned for the protection of cultural and archaeological deposits within the Santa Monica Mountains.

If regulations that apply to this project do not require the presence of a Native American monitor, we ask that you consider having a monitor in place in the event cultural resources cannot be avoided. If you decide to honor our request, please contact our office or Chumash of the project area.

Sincerely yours,

  
Adelina Alva-Padilla, Chairwoman  
Tribal Elders Governing Board

AAP: hg

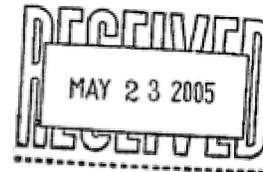


# VENTURA COUNTY FIRE PROTECTION DISTRICT

**BOB ROPER**  
County Fire Chief



165 Durley Avenue  
Camarillo, CA 93010-8586  
(805) 388-9710  
FAX (805) 388-4364



May 12, 2005

Woody Smeck, Superintendent  
United States Department of the Interior  
National Park Service  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360

Dear Superintendent Smeck:

The Ventura County Fire Department appreciates the opportunity to comment on the Environmental Impact Statement for the Santa Monica Mountains National Recreation Area's Fire Management Plan (SMMNRA FMP). We recognize the importance of establishing a collaborative effort between federal and local agencies in the reduction of hazardous vegetation and identifying additional measures that can assist in mitigating the risks associated with wildland fires.

Of the four proposed alternatives, the Ventura County Fire Department supports Alternative 2, which incorporates mechanical fuel reduction, ecological prescribed fire and strategic fuels treatment. This alternative is supported with the qualifications discussed below.

The National Fire Plan (NFP) has made significant strides in addressing the problems related to decades of fire suppression and the resulting increase in decadent fuels in our forests. The premise of the NFP was that an unnatural build up of fuel exists in our forests today due to successful fire suppression efforts that date back to the early 1900's. These successes ultimately lead to a disruption in the natural fire cycle and a corresponding increase in risk for catastrophic fires in our forests. The NFP also recognizes the impact of suburban spread into the interface areas and the difficulty involved in mitigating the hazards associated with wildland encroachment by these assets at risk.

***Committed to Excellence . . . Delivered with Pride***

Providing protection and preservation of life, property and environment to: The Cities of Camarillo, Moorpark, Ojai, Port Hueneme, Simi Valley, Thousand Oaks, and the unincorporated areas of Ventura County

## Input 26 continued

Unfortunately, the NFP did not adequately address the issues we face in southern California with our chaparral fuel types. Our problem lies more with the fact that our interface and intermix areas increase daily with development into wildland areas. Regardless of fire return intervals, the problem persists and needs to be addressed.

The SMMNRA FMP points out that fire return intervals in our local chaparral fuel beds are much more frequent than the average natural return interval estimated to be in the range of 50 to 70 years. The SMMNRA FMP also discusses how this increased frequency can ultimately type convert the fuels to coastal sage and grass models and increase the likelihood that invasive, non-native plants might replace the native vegetation. We do not dispute any of these findings. The Plan and suggested alternatives combined together do not adequately address that the fuels, whether 10 years old or 50 years old, still represent a significant hazard to the communities in the interface and the individual homes in the intermix, and proactive, mitigative measures need to be taken to address the problem.

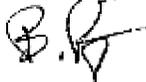
**Community protection should have a higher priority in the Plan.** It is apparent that a conflict does exist in that fire hazard reduction and resource protection are not mutually beneficial in the chaparral and coastal sage fuel models. This fact is recognized and discussed in the body of the SMMNRA FMP. The Plan does not appear to equitably balance the two priorities and instead over weights the negative ecological effects of fire versus the benefits to the communities at risk from prescribed fire and mechanical fuel reduction.

**The value of additional mechanical treatment in the interface is overlooked.** The mechanical fuel reduction that is identified in each alternative in the Plan is limited by the National Park Service to that amount that is currently required to be cleared by the Ventura County Fire Department's Fire Hazard Reduction or "Defensible Space" Program. Your plan identifies the value of treating fuels in the interface, yet none of the alternatives propose increasing mechanical treatment in the interface areas. These treatment areas are perhaps the most valuable in protecting structures in the interface.

**The majority of the vegetation identified for treatment has little benefit in protecting the communities at risk.** The ecological prescribed fires proposed in alternatives 2 and 3 have little relative value for structure protection in that they typically target grass fuel models that are very receptive to fire yet do not burn with the intensity of those fuels found in brush fuel models. Projects of this type typically have protective values for one fire season. Removing fine fuels from areas adjacent to roadways may serve to reduce fire starts. We would be pleased to work with park management in identifying areas that might benefit from projects of this type.

We value the opportunity to comment on the Environmental Impact Statement for your Fire Management Plan and look forward to working with your agency in making our communities more fire safe.

Sincerely,



BOB ROPER  
Fire Chief

BR:ML:m

BOARD OF FIRE COMMISSIONERS

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CITY OF LOS ANGELES  
CALIFORNIA



JAMES K. HAHN  
MAYOR

DEPARTMENT OF FIRE

WILLIAM R. BARNETTE  
FIRE CHIEF

200 NORTH MAIN STREET  
LOS ANGELES, CA 90012

(213) 373-3300  
FAX (213) 373-3310

<http://www.lafd.org>

May 19, 2005

Mr. Woody Smeck, Superintendent  
United States Department of the Interior  
National Park Service  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, CA 91360-4207

Dear Superintendent Smeck:

**COMMENTS REGARDING ENVIRONMENTAL IMPACT STATEMENT –  
FIRE MANAGEMENT PLAN**

The Los Angeles Fire Department (LAFD) respectfully submits the following comments and/or input on the National Park Service's Environmental Impact Assessment for the Santa Monica Mountains National Recreation Area (SMMNRA) Fire Management Plan. As you are aware, both of our agencies share common values and interests, including the protection of life, property, and the environment.

Members from the LAFD's Brush Clearance Unit, Wildland Fuel Management Unit, Brush Committee, and Administrative Staff have met with representatives of the National Park Service regarding the range of alternatives being considered for the SMMNRA Fire Management Plan. Additionally, members from our Planning Section attended a public meeting held in the Santa Monica Mountains to listen to comments made by citizens and other agencies, and provided input concerning this important task. As discussed in these meetings, the SMMNRA is highly unique in natural wildlife, cultural history, and scenic resources and clearly the Fire Management Plan affects numerous public agencies, jurisdictions, non-profit organizations and communities.

Our organizations are both concerned that wildland fires can rapidly transform a beautiful and peaceful environment in the Santa Monica Mountains into a life-threatening major disaster area. Most wildland fires can be effectively suppressed when the weather conditions are moderate. However, wildland fires can be extremely challenging for fire suppression resources during high wind, low humidity, and dry fuel conditions. Despite sophisticated firefighting equipment and highly trained personnel, suppression efforts have limited success during extreme weather conditions without effective fuel mitigation and community education. The purpose of the SMMNRA Fire Management Plan is to evaluate the impacts of implementing various fire management alternatives in the Santa Monica Mountains.

## Input 27 continued

Mr. Woody Smock, Superintendent  
May 25, 2005  
Page 2

The LAFD highly recommends and supports **Alternative 2** of the Santa Monica Mountains National Recreation Area - Fire Management Plan and respectfully concurs with the National Park Service that it should be selected and implemented.

The National Park Service's Fire Management Plan proposes five specific actions to minimize and control the impact from fire in the Santa Monica Mountains. The use of all or some of these actions is incorporated into the four proposed alternatives within the Fire Management Plan.

The description of the five specific actions include:

- **Wildfire Suppression** – Wildfire suppression is an action incorporated into all of the alternatives within the Fire Management Plan. The National Park Service and the LAFD support wildfire suppression for all fires in the Santa Monica Mountains because of its dense areas of urban interface. It is recognized by both agencies that the purpose of wildfire suppression is to limit the area burned in order to preserve life and property, while limiting habitat fragmentation caused by fire.
- **Mechanical Fuel Reduction** – Mechanical fuel reduction is an action that when implemented reduces hazardous fuel loads by a mechanical means, i.e., chainsaw, shears, etc. This form of fuel reduction is concentrated at the wildland urban interface to areas adjacent to (within 200 feet in Los Angeles) residential structures. The main purpose of this action is to provide structures with a defensible space and limit habitat fragmentation.
- **Ecological Prescribed Fire** - Ecological prescribed fires are only proposed in annual grasslands (i.e., not shrublands) so that the visual impact of the prescribed fire will have disappeared within six months. The specific intent of this type of prescribed burn is to target hazard fuel while promoting ecosystem restoration and habitat protection.
- **Strategic Fuel Reduction** – Strategic fuel reduction is an action that reduces brush or fuel load by either prescribed burn or mechanical fuel reduction. The specific intent of this action would be to reduce fuels in strategic locations to limit fire spread, protect identified values at risk, and/or allow control of a fire perimeter.
- **Education and Community Support** – An important action that is common to all the Fire Management Plan Alternatives is education and community support. An essential part of reducing the risk to homeowners and residents requires that they assume personal responsibility for their property and are aware of the potential danger fire poses to their community in the Santa Monica Mountains. The National Park Service and the LAFD are both committed to provide education and assistance for the community. This action is also incorporated into all the alternatives.

### Alternatives

The following is a brief description of the four proposed SMMNRA Fire Management Plan Alternatives and the LAFD's associated concern and/or support statements (*in italics*):

**Alternative 1 - No Action.** Continue the current National Park Service's fire and vegetation management program to create a landscape mosaic of varying aged chaparral through the application of prescribed fire

AN EQUAL EMPLOYMENT OPPORTUNITY – AFFIRMATIVE ACTION EMPLOYER

## Input 27 continued

Mr. Woody Smeck, Superintendent  
May 25, 2005  
Page 3

Statement: *This alternative is currently utilized by the National Park Service for fire and vegetation management in the Santa Monica Mountains. This alternative does not propose any mechanical fuel reduction with the purpose of providing a defensible space around structures similar to the LAFD's Brush Clearance Program. Additionally, this alternative proposes limited strategic fuel reduction that when utilized has historically minimized the spread of brush fires.*

**Alternative 2** – Prescribed burning is used to enhance the environment by eliminating old growth to make room for new growth. In addition, hazardous fuel reduction projects using prescribed burn and mechanical fuel reduction would be utilized in strategic locations to reduce the chance of fire spread. Mechanical fuel reduction in this alternative is concentrated at the wildland urban interface to protect structures.

Statement: *This alternative uses prescribed burning that provides fuel modification benefits for grassland areas. In addition, it utilizes strategic fuel modification projects to modify fire spread. Most importantly, from the LAFD's perspective, this alternative provides a defensible space for structures through mechanical fuel reduction at the wildland urban interface.*

**Alternative 3** -- Prescribed burning is used for enhancement only. Additionally, mechanical fuel reduction is incorporated into this alternative at the wildland urban interface to protect structures.

Statement: *This alternative proposes mechanical fuel reduction to provide a defensible space around structures within the wildland urban interface. This alternative does not incorporate strategic fuel reduction actions for the specific purpose of minimizing the spread of potential brush fires.*

**Alternative 4** - Mechanical fuel reduction only and is concentrated at the wildland urban interface to protect structures.

Statement: *This alternative provides effective protection for structures through mechanical fuel reduction at the wildland urban interface only. This alternative does not incorporate strategic fuel reduction or ecological prescribed as an action within the alternative.*

After analyzing the four alternatives it has been determined that Alternative 2 provides the greatest number of options for minimizing the impact of a brush fire in the Santa Monica Mountains. It allows all the proposed actions in the Santa Monica Mountains Fire Management Plan to be incorporated without favoring one strategy over another. This alternative also allows the National Park Service and the LAFD, both with different missions and purpose, to meet their needs with similar solutions. Reducing hazardous fuels in strategic locations has already proven to be one of the most effective methods of protecting life and property in Los Angeles. The National Park Service, through their endorsement of Alternative 2 has also concluded that hazardous fuel reduction strategies maintain and enhance the environment in the Santa Monica Mountains. Meetings with both our agencies and input from the community has determined that implementation of this alternative would ultimately enhance public safety, provide a higher level of protection for property, and increase the firefighters odds toward fire suppression while protecting the natural and cultural resources in the Santa Monica Mountains.

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

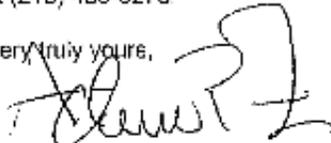
Input 27 continued

Mr. Woody Smeck, Superintendent  
May 25, 2005  
Page 4

Thank you for allowing the LAFD's comments to be considered regarding the National Park Services Environmental Impact Statement.

If you have any questions regarding our comments, please contact Battalion Chief Tim Kerbrat at (213) 485-6273

Very truly yours,



~~For~~ WILLIAM R. BAMATTRE  
Fire Chief

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER



# Appendix G Concurrence From Regulatory Agencies

## Concurrence I

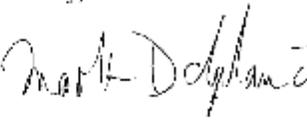
<small>STATE OF CALIFORNIA—THE RESOURCES AGENCY</small>	<small>ARNOLD SCHWARZENEGGER, GOVERNOR</small>
<b>CALIFORNIA COASTAL COMMISSION</b>	
<small>45 FREMONT, SUITE 2090 SAN FRANCISCO, CA 94105-2219 VOICE AND TDD (415) 904-5200 FAX (415) 904-5400</small>	
June 27, 2005	
<p>Woody Smeck Superintendent, Santa Monica Mountains NRA National Park Service ATTN: Ray Sauvajot 410 West Hillcrest Drive Thousand Oaks, CA 91360-4207</p>	
<p>Subject: Negative Determination ND-069-05, Draft Fire Management Plan for Santa Monica Mountains National Recreation Area, Los Angeles and Ventura Counties</p>	
<p>Dear Mr. Smeck:</p>	
<p>The Coastal Commission staff has reviewed the above-referenced negative determination. The National Park Service (Service) has submitted a Draft Fire Management Plan for federal lands within the Santa Monica Mountains National Recreation Area (NRA) in Los Angeles and Ventura Counties. The preferred alternative in Draft Fire Management Plan proposes three general actions:</p>	
<ul style="list-style-type: none"><li>• <u>Mechanical Fuel Modification</u>: Continue to perform fuel modification and weed abatement on approximately 90 acres of parkland located at the wildland urban interface. These are areas that have been maintained as fuel modification zones for many years and are low quality habitat of predominately non-native annual grassland.</li><li>• <u>Ecological Prescribed Fire</u>: Consider the use of prescribed fire in annual grasslands to restore native species or control non-native invasive species.</li><li>• <u>Strategic Fuel Reduction</u>: Identify potential locations where reduction of plant biomass by either prescribed fire or mechanical fuel treatments in strategic locations would modify fire behavior to the extent that it would limit fire spread, protect identified values at risk, or allow control of a fire perimeter.</li></ul>	
<p>The Service notes in its negative determination that the absence of fixed geographical locations for potential fire management and fuel modification projects in the NRA precludes a complete analysis at this time of potential effects to coastal zone resources. As a result, the Service will undertake additional National Environmental Policy Act analysis for individual projects which will be developed during implementation of the Fire Management Plan. This will allow the Service to adequately assess project-specific effects on sensitive resources within the NRA and on the adjacent coastal zone, and to develop any necessary mitigation measures to protect those resources.</p>	

Concurrence I continued

ND-069-05 (National Park Service)  
Page 2

The Service has also committed to submit additional consistency and/or negative determinations to the Commission for any future Fire Management Plan projects within the NRA that hold the potential to adversely affect coastal zone resources. With this commitment, the Commission staff **agrees** that the proposed Draft Fire Management Plan will not adversely affect coastal resources, and we therefore **concur** with your negative determination made pursuant to 15 CFR 930.35 of the NOAA implementing regulations. Please contact Larry Simon at (415) 904-5288 should you have any questions regarding this matter.

Sincerely,



(for)

PETER M. DOUGLAS  
Executive Director

cc: South Central Coast District office  
California Department of Water Resources  
Governor's Washington, D.C., Office

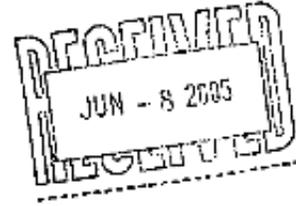
Concurrence 2



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
Southwest Region  
501 West Ocean Boulevard, Suite 4200  
Long Beach, California 90802-4218

151422SWR04PRI13030:APS

JUN 7 2005



Woody Smock  
National Park Service  
Santa Monica Mountains Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, California 91360

Dear Mr. Smock:

NOAA's National Marine Fisheries Service (NMFS) reviewed the National Park Service's (NPS) letter of May 13, 2005, regarding the fire management plan (FMP) for the Santa Monica Mountains National Recreation Area (action area). The preferred alternative of the FMP includes mechanical fuel modification, ecological prescribed fire, and strategic fuel reduction, which would be undertaken in the action area. Endangered steelhead trout (*Oncorhynchus mykiss*) are present in the action area and are susceptible to any upstream activity, including activities related to the proposed action. NMFS understands that NPS determined the proposed action (i.e., preferred alternative of the FMP) is not likely to adversely affect steelhead, and requested concurrence with this determination.

NMFS agrees with NPS' determination. The proposed action appears to contain sufficient measures to reduce the likelihood that fire-management activities would adversely affect steelhead. Further, activities under the preferred alternative would be confined only to areas where effects are not expected to extend into steelhead habitats.

This concludes section 7 consultation for this proposed action. Consultation must be reinitiated where discretionary federal agency involvement or control over the action has been retained (or is authorized by law) and: (1) if new information becomes available revealing effects of the action on listed species in a manner or to an extent not previously considered, (2) if project plans change, (3) if the agency action is subsequently modified in a manner that causes an effect to listed species that was not considered, or (4) if a new species or critical habitat is designated that may be affected by this action. Please call Anthony Spina at (562) 980-4045 if you have any questions concerning this letter or if you would like additional information.

Sincerely,

Rodney R. McInnis  
Regional Administrator



Concurrence 3



United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Ventura Fish and Wildlife Office  
2493 Portola Road, Suite B  
Ventura, California 93003

IN REPLY REFER TO:  
PAS 2151.3142.3721

July 27, 2005

Memorandum

To: Superintendent, Santa Monica Mountains National Recreation Area,  
Thousand Oaks, California

From: *Rick E. Farni*  
Division Chief, Southern Santa Barbara/Ventura/Los Angeles Counties,  
Ventura Fish and Wildlife Office, Ventura, California

Subject: Santa Monica Mountains National Recreation Area Fire Management Plan,  
Ventura and Los Angeles Counties, California

We have reviewed your revised request, dated May 13, 2005, and received in our office on May 17, 2005, for our concurrence with your determination that prescribed burning and fuel modification activities outlined in your fire management plan are not likely to adversely affect 22 federally threatened and endangered species. These species are:

Salt marsh bird's beak	<i>Cordylanthus maritimus ssp. maritimus</i>
Lyon's pentachaeta	<i>Pentachaeta lyonii</i>
Braunton's milk-vetch	<i>Astragalus brauntonii</i>
Coastal dunes milk-vetch	<i>Astragalus tener var. titi</i>
Marcescent dudleya	<i>Dudleya cymosa ssp. marcescens</i>
Santa Monica Mountains dudleya	<i>Dudleya cymosa ssp. ovatifolia</i>
Conejo dudleya	<i>Dudleya abramsii ssp. parva</i>
Verity's dudleya	<i>Dudleya verityi</i>
Wright's (=Quino) checkerspot butterfly	<i>Euphydryas editha quino</i>
Callipe silverspot butterfly	<i>Speyeria callippe callippe</i>
Riverside fairy shrimp	<i>Streptocephalus woottoni</i>
Tidewater goby	<i>Eucyclogobius newberryi</i>
Southern California steelhead trout	<i>Oncorhynchus mykiss</i>
California red-legged frog	<i>Rana aurora draytonii</i>
Brown pelican	<i>Pelecanus occidentalis californicus</i>
Light-footed clapper rail	<i>Rallus longirostris levipes</i>
California least tern	<i>Sterna antillarum browni</i>
Southwestern willow flycatcher	<i>Empidonax trailii extimus</i>
Least Bell's vireo	<i>Vireo bellii pusillus</i>
Bald eagle	<i>Haliaeetus leucocephalus</i>
Western snowy plover	<i>Charadrius alexandrinus nivosus</i>
Coastal California gnatcatcher	<i>Polioptila californica californica</i>

## Concurrence 3 continued

Superintendent, Santa Monica Mountains NRA

2

Your proposed fire management plan for the Santa Monica Mountains National Recreation Area (Santa Monica Mountains NRA) provides a framework for three fire management strategies under your preferred alternative (National Park Service 2004): mechanical fuel modification, ecological prescribed fire, and strategic fuel reduction. Although discussed in your fire management plan, you have not requested informal consultation on fire suppression activities. These can be dealt with on an emergency consultation basis during individual suppression events, as needed. Details of fire suppression activities are not discussed further in this memorandum.

Mechanical fuel modification would involve the continued weed abatement and maintenance of a reduced fuel load on approximately 90 acres of parkland located at the wildland urban interface. These areas have been maintained as fuel modification zones for many years and are predominantly non-native annual grasslands of low habitat quality that retain little or no native vegetation. Only those areas that fall within 200 feet of structures would continue to be maintained as fuel modification zones. To maintain the effectiveness of the fuel modification zones, herbaceous vegetation needs to be reduced annually, while shrubs and trees need to be limbed or removed only every few years. Because Los Angeles and Ventura Counties do not permit new development that requires vegetation clearance on park property, there will be no need to expand the zone of mechanical fuel modification beyond those areas that are already maintained by the park.

Ecological prescribed fire would be conducted in annual grasslands or oak savannah that are depauperate of native plant species and are dominated by non-native grasses and forbs. Ecological prescribed fire would be used to restore native species or control non-native invasive plants. Projects would generally not exceed 275 acres at any one time, with up to 4 projects occurring per year. In all likelihood, the largest projects would be approximately 150 acres. No resident sensitive (including federally listed) species that could be directly affected by prescribed fire are expected to occur in these restoration areas. However, all sites would be surveyed for potential listed species prior to finalizing a prescribed burn project; if present, the burn plan would be modified as necessary to avoid adverse effects (National Park Service 2004).

Strategic fuel reduction would be conducted in strategic locations where fire behavior would be modified to the extent that it would limit fire spread, protect identified values at risk, or allow control of a fire perimeter. It would be accomplished through the use of prescribed fire or mechanical fuel treatments. You have proposed 150 acres per project with a maximum of 2 projects per year that could realistically and reliably be treated by park personnel in co-operation with partner agencies. The individual strategic fuel reduction zones have not yet been identified and mapped. Any strategic fuel reduction project would require a separate environmental assessment and risk/benefits analysis, as well as a request for concurrence, if appropriate. However, as stated in your letter requesting concurrence, any direct or indirect adverse impacts to sensitive or listed species would preclude a strategic fuels reduction project from being implemented.

## Concurrence 3 continued

Superintendent, Santa Monica Mountains NRA

3

We concur with your determination that your plans for mechanical fuel modification, ecological prescribed fire, and strategic fuel reduction described in the fire management plan for the Santa Monica Mountains NRA are not likely to adversely affect any of the species listed above under jurisdiction of the Service. The southern steelhead trout is administered by the National Marine Fisheries Service. Our concurrence for the other 21 species is based on the following.

Some of the species are not likely to be found within the Santa Monica Mountains NRA. The coastal dunes milk-vetch only occurs in Monterey County (Service 2004). The Callippe silverspot butterfly is found only in the San Francisco Bay area (San Mateo and Alameda Counties). Wright's checkerspot butterfly (= Quino checkerspot butterfly) is found in San Diego, Riverside, San Bernardino, and Orange Counties. The Riverside fairy shrimp has never been recorded in the Santa Monica Mountains NRA.

A number of the bird species for which you are requesting concurrence, and which occur in Ventura and Los Angeles Counties, basically fall into this same category. They are not likely to be found within the Santa Monica Mountains NRA, at least not breeding within the Santa Monica Mountains NRA. The California gnatcatcher has never been recorded from the Santa Monica Mountains NRA. The bald eagle (and California condor) are historic to the Santa Monica Mountains, but there have been no recent sightings. The least Bell's vireo and southwestern willow flycatcher occasionally pass through the Santa Monica Mountains during migration, but have never been documented to nest there. Additionally, fuel modification would also be steered away from riparian areas, with a 100-foot set-back provided from riparian vegetation (where least Bell's vireos and southwestern willow flycatchers would be found, if present). If adults of any of these bird species were to be found in or near areas being treated by National Park Service fire crews, they would simply fly away from fire management activities to nearby suitable habitat. Also, if these birds or any other listed species were to be detected in within a fire management zone, project activities would be modified such that adverse effects to the species would be avoided.

A number of the species for which you are requesting concurrence are restricted to coastal habitats. The salt marsh bird's-beak, brown pelican, light-footed clapper rail, California least tern, and western snowy plover are all found in coastal salt marsh and coastal strand habitats (e.g., in and around Mugu Lagoon). In such habitats, fire management activities are unnecessary and would not be conducted.

A number of the species for which you are requesting concurrence are found within the Santa Monica Mountains NRA, but not on National Park Service property. Verity's dudleya and Conejo dudleya can be found within the Santa Monica Mountains NRA, but both have restricted distributions in the west end of the Santa Monica Mountains and Montelef Ridge, respectively, and are not likely to be found on existing National Park Service parkland where fuel reduction activities would occur. The tidewater goby can be found in Malibu and Topanga Lagoons. The National Park Service does not own property near these lagoons, but owns small parcels of land many miles upstream from these two lagoons. We do not expect potential sediments generated from prescribed burning or fuel modification activities to reach these lagoons in any significant

### Concurrence 3 continued

Superintendent, Santa Monica Mountains NRA

4

amounts. The only known population of California red-legged frogs within the Santa Monica Mountains NRA occurs in east Las Virgenes Creek. The National Park Service does not own this property, nor any upstream from the California red-legged frog population.

The remaining four species, Lyon's pentstemon, Braunton's milk-vetch, Santa Monica Mountains dudleya, and marcescent dudleya, are known to occur in limited numbers on National Park Service land. However, botanical surveys would be conducted prior to finalizing any strategic fuel reduction and ecological prescribed fire project. If these species were found, the project would be modified such that adverse effects to these species would be avoided. As indicated above, mechanical fuel modification would continue only in wildland urban interface areas near structures, which have been repeatedly cleared for many years and are predominantly non-native annual grasslands of low habitat quality that retain little or no native vegetation. Based on habitat characteristics and past land use, none of these listed plants are believed to grow in the existing fuel modification zones. In addition, the dudleya species typically do not grow in habitats where fuel modification would be necessary, such as sheer volcanic rock surfaces, canyon walls, and rock outcroppings (Service 1999).

The Santa Monica Mountains NRA fire management plan may ultimately benefit listed species by reducing the severity and extent of future wildfires as a result of the proposed fuel modifications and aiding in the control of invasive species.

No further consultation pursuant to section 7 of the Endangered Species Act of 1973, as amended, is required at this time. If you become aware of new information regarding the design or implementation of the proposed project, or if a listed species has been adversely affected by the project, we recommend that you contact us as soon as possible to assess the need for further consultation. Any prescribed burning or fuel treatment projects not specifically contemplated by your fire management plan that may adversely affect a listed species would require separate section 7 consultation under the Endangered Species Act of 1973, as amended.

If you have any questions, please contact Creed Clayton of this office at (805) 644-1766, extension 335.

#### Literature Cited

- National Park Service. 2004. Draft environmental impact statement, fire management plan, Santa Monica Mountains National Recreation Area. March, 2004. U.S. Department of Interior, National Park Service
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Santa Monica Mountains  
National Recreation Area

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