

Ed Pert, South Coast Region Manager  
CA Dept. of Fish and Wildlife  
3883 Ruffin Rd.  
San Diego, CA 92123

July 8, 2013

Re: San Felipe escaped fire/San Felipe Valley Wildlife Area

Dear Mr. Pert,

We would like to thank you and the Department for acting so promptly upon our June 3, 2013 Public Records Request regarding the 2013 San Felipe escaped fire in the San Felipe Valley Wildlife Area. We received the materials July 1.

Although we are still awaiting the fulfillment of our records request to Cal Fire on the prescribed burn (the Project) and the resulting escape, the information you have provided combined with an onsite inspection have given us enough material to conduct a preliminary evaluation. We felt it was important to share that evaluation with you. In summary we have concluded the following:

- the rationale for the Project was ecologically unsound
- claims that the Project would reduce wildfire impacts and provide indirect community protection to Julian and Shelter Valley are unsupportable
- the Project and the escaped fire caused significant environmental damage to a protected, rare, and environmentally sensitive habitat
- fire suppression activities damaged riparian areas and possibly cultural sites
- the Project violated the Dept. of Fish and Wildlife's 2009 Land Management Plan for the San Felipe Valley Wildlife Area
- Cal Fire may have violated its burn prescription plan
- Cal Fire appears to have ignored a National Weather Service Wind Advisory on the date of the burn

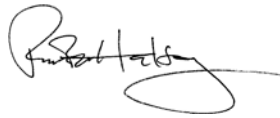
In light of these conclusions **we recommend the establishment of an official protocol for both the Department and Cal Fire to determine the efficacy and ecological impact of major vegetation treatments that includes an independent, outside review of projects while in the initial planning stages.**

A detailed report follows this cover letter.

The Project and the escaped fire provide important examples of why we, other conservation organizations, and leading fire scientists are concerned with the overall approach taken by Cal Fire in their state Vegetation Treatment Program. We are hoping the experience of the San Felipe Fire and other escapes, such the 2012 Creek Fire in Montana de Oro State Park and on Stonewall Peak in Cuyamaca Rancho State Park, will inspire needed **change in the current paradigm of seeing chaparral a fuel rather than the valuable natural resource it represents.**

We would like to meet with you at your convenience to help develop a strategy that will hopefully prevent similar damages to California's natural resources.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard W. Halsey', with a stylized flourish at the end.

Richard W. Halsey  
Director

cc: Randy Botta, CDFW

Megan Penick, Public Records Act Coordinator, CDFW

Kim Spire, Legal Services, Cal Fire

Russ Henly, Assistant Deputy Director, Cal Fire

Dan Silver, Endangered Habitats League

Frank Landis, Conservation Chair, California Native Plant Society, San Diego

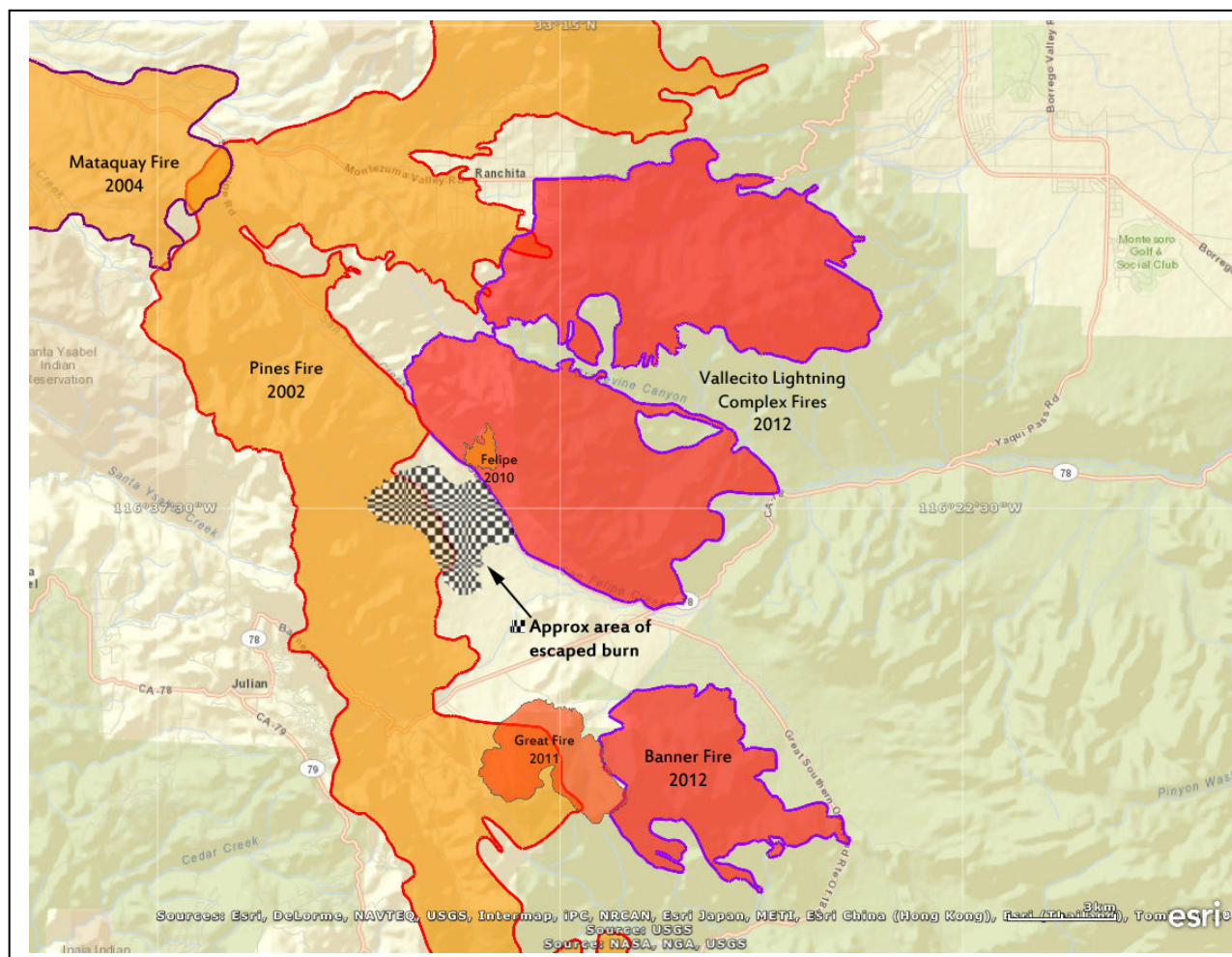
## Escaped Cal Fire Prescribed Burn San Felipe Valley Wildlife Area

**-Evaluation prepared by The California Chaparral Institute -  
July 4, 2013**

The San Felipe Valley prescribed burn project (the Project), which was part of the San Felipe Valley Vegetation Management Plan (VMP), was proposed by the Department of Forestry and Fire Protection (Cal Fire). The agreement to conduct the project was signed by Cal Fire and the California Department of Fish and Wildlife (CDFW), May 22, 2012.

The Project burn was started May 23, 2013. According to Cal Fire's Incident Information website, the burn became a wildfire incident at 12:20 PM. The wildfire was finally contained on May 26, 2013, after burning 2,781 acres. Much of the burned area was recovering from 2002 Pines Fire. Five minor injuries were reported.

As can be seen in the fire history map below, the area has been saturated with fire over the past decade. The Project burn was conducted in one of the last unburned areas in the region.



## **Rationale**

According to the Prescribed Burning Project Agreement, the intent of the Project was to “improve habitat, eliminate non-native/invasive species, reduce wildfire impacts and provide indirect community protection to Julian and Shelter Valley.”

These goals are scientifically unsupportable.

### **Invasive Grass Control**

Of the six “blocks” scheduled for burning, numbers 1-4 (total of 408 acres) related to the goal of eliminating non-native/invasive species. While Cal Fire indicated that the optimal time to burn to control weedy grasses was before the seeds matured (late spring/early summer), due to the usual climatic conditions in the near desert-like environment of the San Felipe Valley, the grass seeds had actually cured before the May 23 burn.

Cal Fire’s weed control rationale for this goal is unsupportable because,

- no follow-up plan was proposed to prevent the annual reinvasion of non-native grasses
- the broad landscape directly next to the Project (across San Felipe Valley Road) burned in the 2012 Vallecito Lightning Complex is now covered by invasive grasses
- most of San Felipe Valley has been invaded by the species Cal Fire suggested would be controlled by the burn and will easily recolonize the Project area (Photo 1)
- in a thorough review of the literature Keeley (2006) concluded that,

Use of prescription burning to eliminate noxious aliens has had questionable success, particularly when applied to disturbance-dependent annuals, and success is most likely when coupled with ecosystem restoration that alters the competitive balance between aliens and natives.

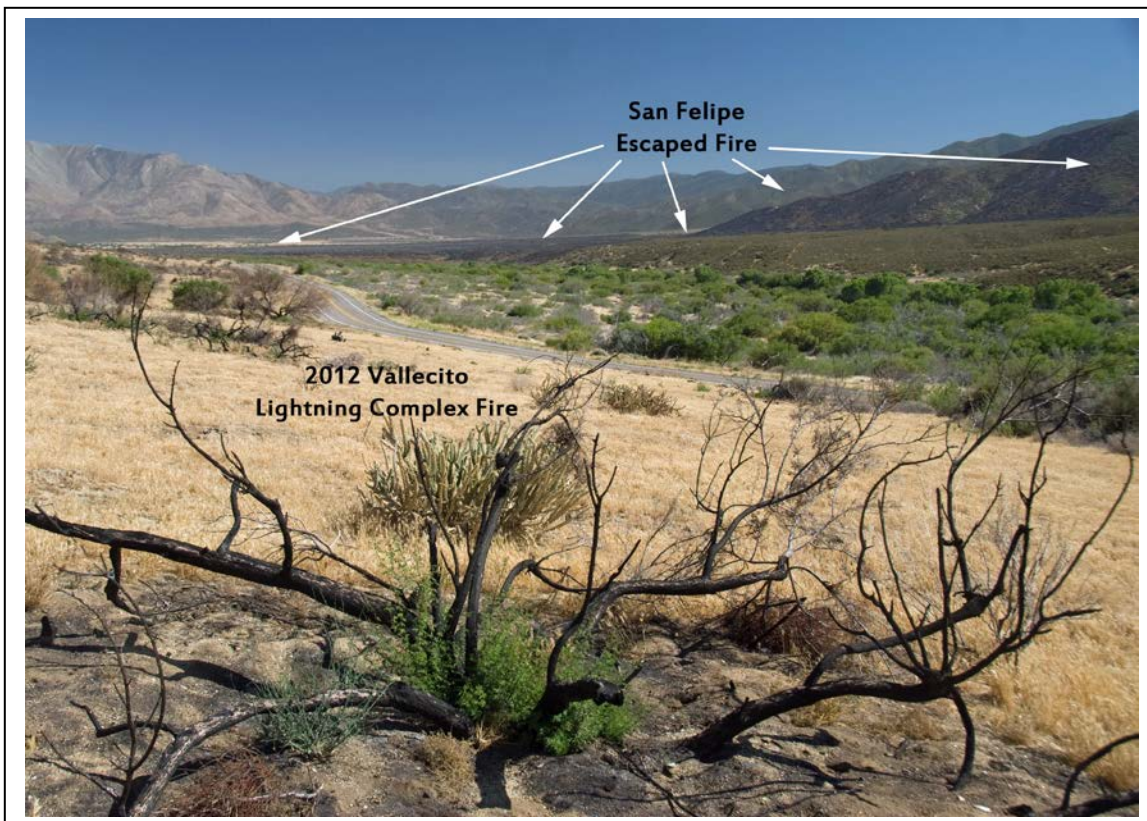
The paper is available here:

[http://www.californiachaparral.org/images/Fire\\_Management\\_Invasives\\_in\\_West.pdf](http://www.californiachaparral.org/images/Fire_Management_Invasives_in_West.pdf)

It is unlikely that the San Diego Unit of Cal Fire or the San Diego County Fire Authority were unaware of this research since we have provided this and many other papers regarding the spread of invasive weeds in response to fire to both agencies over the past decade during our involvement in local wildland fire issues.

The invasive weed issue as well as the negative consequences of too many fires are some of the reasons the National Park Service in the Santa Monica Mountains Recreation Area no longer conduct prescribed burns in chaparral. For additional details, please see their website: <http://www.nps.gov/samo/parkmgmt/prescribedfires.htm>





**Photo 1:** Massive invasion of non-native grasses as the result of the Vallecito Lightning Complex Fire directly across the street from the San Felipe Valley Wildlife Area.

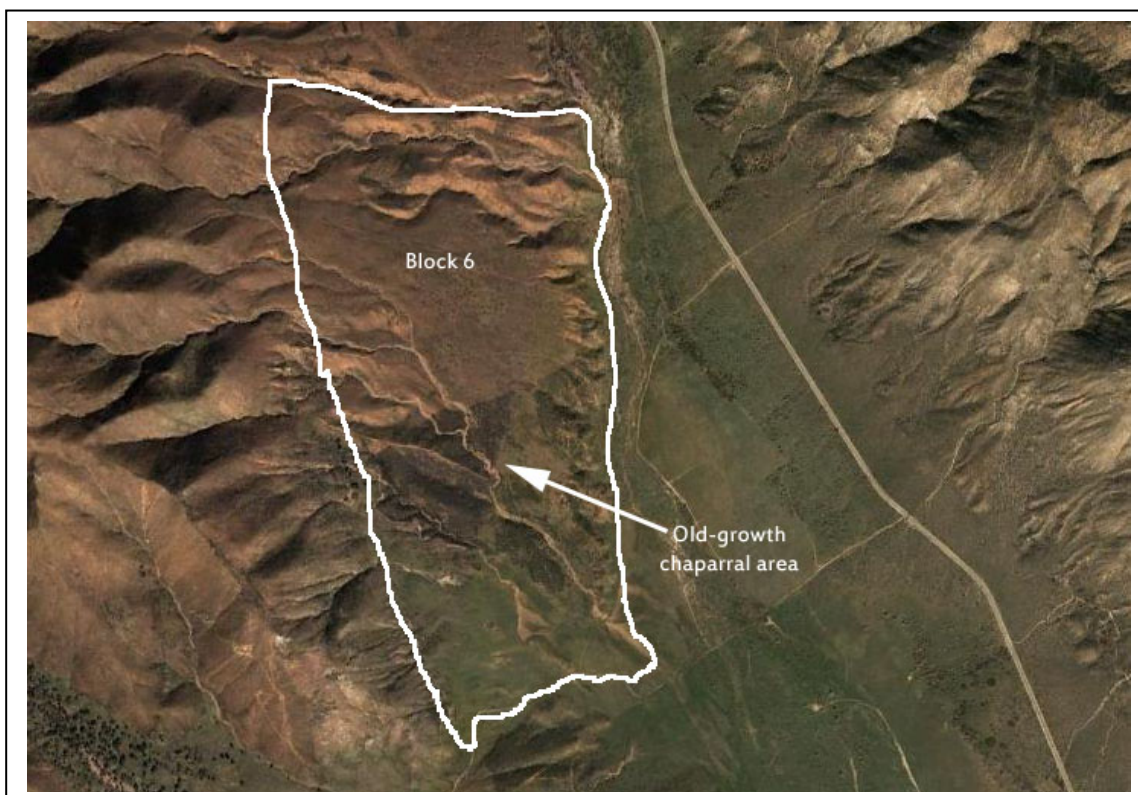
### Improvement of Habitat

According to the project description, blocks 5-6 were to be burned to “improve habitat.” This was to be done by “creating mosaic patterns in moderately aged to decadent brush stands for improving deer grazing. The plan is to burn these blocks every 7-15 years.”

Of all the justifications for this project, this **is the most egregious not only because it is based on outdated, incorrect assumptions, but also because it targeted for destruction the last remaining, healthy old-growth stand of desert chaparral in the entire San Felipe Valley Wildlife Area.**

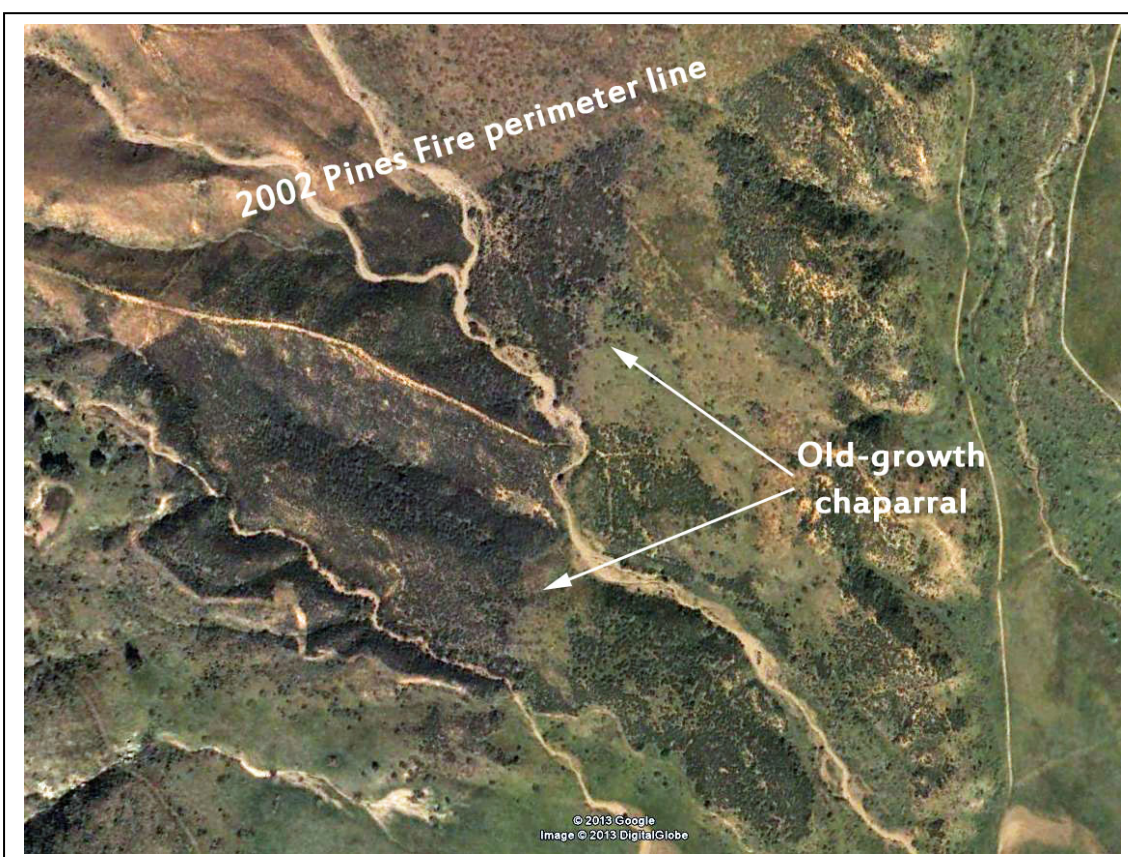
The old-growth stand was approximately 320 acres and was composed of obligate seeding *Ceanothus perplexans* (formerly *C. greggii*), as well as *Adenostoma fasciculatum*, *Quercus berberidifolia* and other shrubs pejoratively referred to in the project description as “decadent brush.” The stand was 70 years old (Photos 2-3). All the other shrubland habitats were 11-years-old since they had burned during the 2002 Pines Fire (Photo 4).





**Photo 2 above:** Satellite view of block 6 showing the last, remaining stand of old-growth chaparral in the Wildlife Area after the 2002 Pines Fire. The stand was 70 years old.

**Photo 3 below:** Close up of old-growth chaparral shown in Photo 2.







**Photo 4:** Burned 10-year-old Ceanothus. Research has shown that obligate seeding species such as this can be eliminated from areas with such high fire frequency (approx. 10-20 year interval).

The notion of “creating mosaic patterns” in decade old chaparral for ecological reasons has no merit whatsoever unless Cal Fire and the Department intended to type-convert the habitat into an invasive grassland of the type the Project description indicated it was trying to control. Research has clearly shown that burning chaparral at the frequency Cal Fire was proposing, every 7-15 years, is a guaranteed pathway to type-conversion. Please see our webpage on Threats to Chaparral for the relevant papers:  
<http://www.californiachaparral.org/threatstochaparral.html>

According to the Project, the burn would “reduce the fuel load within the shrub covered blocks (#5-6) thus allowing access for wildlife and providing increased forage quality.” We are requesting the Department and Cal Fire to document how the loss of 320 acres of old-growth chaparral and the repeated burning of young chaparral a decade old would improve the quality of native habitat.

### **Fire Impacts and Community Protection**

Cal Fire did not indicate what “wildfire impacts” the project was supposed to be reducing since blocks 1-4 were small areas covered with invasive grasses and blocks 5-6 contained mostly very young chaparral.

However, the suggestion that the project would provide “indirect community protection to Julian and Shelter Valley” appears to reflect a misunderstanding of likely fire behavior in the area and the most effective way to protect communities from wildland fire.

Julian is 4.5 miles away to the southeast and 2,000 feet higher with a forested ecosystem. Shelter Valley is 6 miles away to the southwest with extremely light, arid vegetation between the two locations.

We are unaware of any reasonable fire modeling that would create a likely scenario in which a fuel treatment in the project area would have an impact on reducing fire risk in the communities of Julian or Shelter Valley.

### **Violation of Land Management Plan**

In addition to the negative impacts the Project caused by burning the last old-growth chaparral stand, the escaped burn magnified the ecological damage significantly by:

- re-burning recovering, decade-old chaparral, thus setting the stage for type-conversion
- encouraging the spread of invasive species
- burning the eastern-most Engelmann oak grove in the Wildlife Area
- compromising a lone, ancient sycamore tree at the valley/mountain interface (Photo 5).



**Photo 5:** Burned, lone sycamore.



The extensive damage caused by the escaped burn necessitates that the Department develop a new land management plan for the Area in order to properly mitigate the destruction of habitat. In addition, *it is critical* that the new plan be based on the most recent, peer-reviewed chaparral science and be properly monitored to ensure compliance.

In examination of the relevant documents we can only conclude that **the Department and Cal Fire violated the 2009 Land Management Plan for the San Felipe Valley Wildlife Area** in the planning and approval process for the burn for the reasons below.

### **Chaparral Recovery**

Regarding the Wildlife Area's chaparral habitat, the 2009 Plan set a goal to,

Promote the recovery of stand structure, species composition, and wildlife habitat functions of the chaparral and scrub oak habitats burned in the Pines Fire and in any future wildfires. (5-11)

And,

The fire recovery regime will include a component focused on the continued recovery of chaparral, scrub, and grassland habitats in the Pines Fire burn area and guidelines for recovery actions following future wildfires. The regimes will be prepared and implemented in cooperation with CalFire and revised on an as-needed basis. (5-11)

Cal Fire's planned burn in blocks 5-6 and the resulting escaped burn has **caused the destruction of stand structure, the elimination of obligate seeding shrub species, the loss of habitat, and sent the chaparral habitat in the Wildlife Area down the path to type-conversion.**

We would like the Department and Cal Fire to clarify how the Project complied with the 2009 Management Plan's direction to focus "on the continued recovery of chaparral?"

### **Weed Spread**

The planners for the prescribed burn project also ignored the recognition in the 2009 Management Plan of the risk posed by invasive weeds and the potential for weed spread resulting from the burn.

There also is a concern of heightened fire risk because of the prevalence of nonnative grasses in re-growth areas..." (5-13)

## Engelmann Oaks

While the burning of the easternmost Engelmann oak grove by the escaped burn was obviously not part of the original prescribed burn project, the 2009 Management Plan clearly indicated the fragility of the habitat (Photo 6).

Because many of the older oaks were damaged and many young oaks were destroyed in the Pines Fire, there is a management concern regarding the quality of the existing breeding, foraging, and sheltering habitat in the oak woodlands and the ability of the stands to regenerate. (5-13)

Considering the fragility of the surviving oak groves, the Project should have included measures to protect these resources in the event of an escape. We could not find any such measures.



**Photo 6:** Burned Engelmann oak grove habitat.

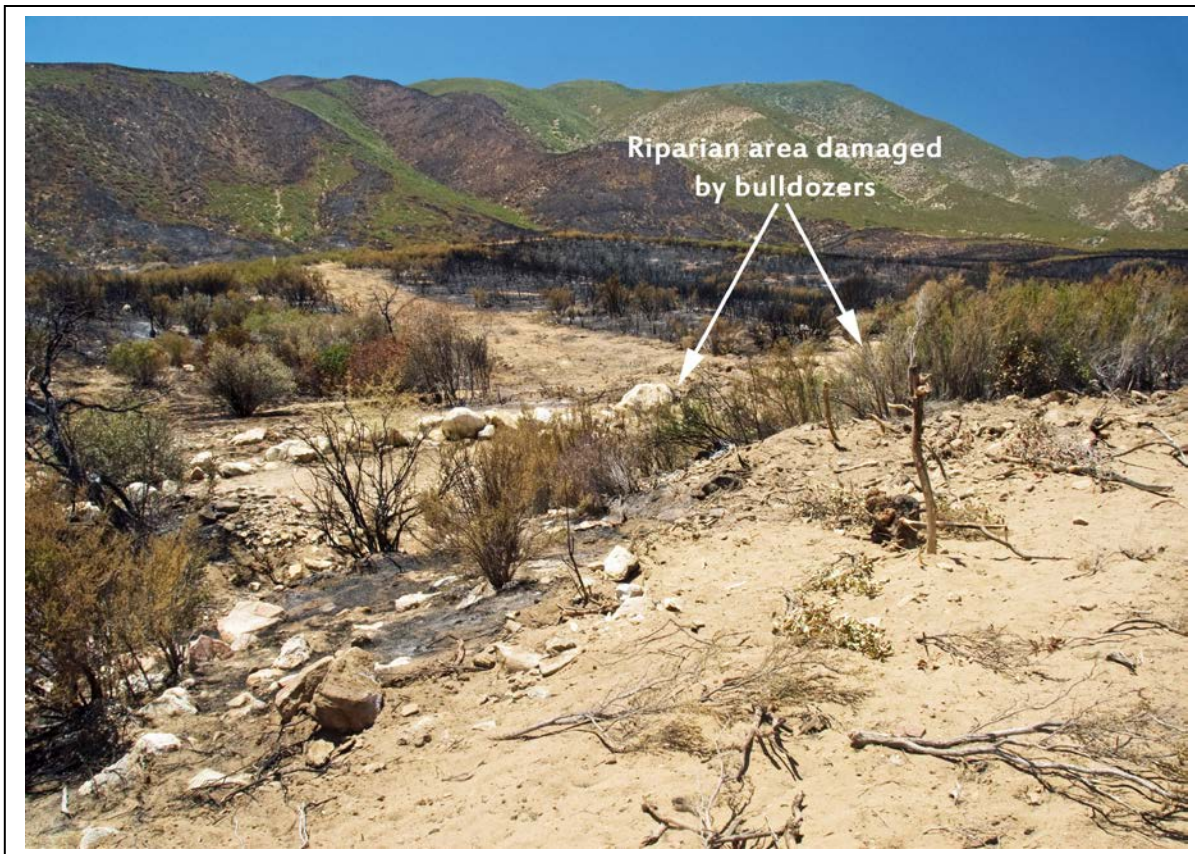


## Fire Suppression Damage

During the suppression action, there was significant damage done to several water courses by dozers, also in violation of the 2009 Management Plan (Photo 7).

1. Establish the following guidelines for fire suppression activities in the WA:
  - b. Prohibit bulldozer use within 100 feet of stream centers and in all riparian areas.” (5-35)
  - d. Avoid bulldozer use within 100 feet of cultural resource sites and any known populations of listed plants, amphibians, reptiles, or mammals.

Since there were cultural sites recorded in the Project area, we suspect there were also sites within the area of the escaped burn and possibly disturbed during the fire suppression activities.



**Photo 7:** Damage to riparian areas by bulldozers.

## Compliance with Burn Prescription

While we are still awaiting records from Cal Fire to determine the actual cause of the escaped burn, the currently available data make it highly likely that Cal Fire was out of compliance with their burn prescription due to prevailing wind conditions.

The average wind speed on the day of the burn (May 23, 2013) recorded at the Ranchita RAWS (a monitored station cited in the burn prescription) between 8AM and 4PM was over 15mph with gusts as high as 33mph.

The National Weather Service issued a Wind Advisory effective May 23 2013 03:18 AM PDT, expiring May 24 2013 03:00 AM.

The burn prescription set the maximum wind speed at 15mph.

The burn prescription made it clear that,

Due to the geographic location of this project at the juncture of the desert and the mountains of San Diego County, weather will be a large and ever changing factor to the success of this burn. Proper forecasting and accurate and timely monitoring of weather will be critical. (pg. 15)

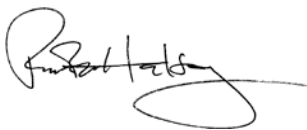
When considering the risk created by geography, grassy fuels, RAWS measurements, and the issuance of a Wind Advisory, Cal Fire's decision to conduct the burn is inexplicable.

## Summary

This Project and the escaped fire provides important examples of why we, other conservation organizations, and leading fire scientists are concerned with the overall approach taken by Cal Fire in their state Vegetation Treatment Program.

In light of this escaped burn, protocol to determine the efficacy and ecological impact of vegetation treatment projects needs to be established and should include outside review in the initial planning stages.

The experience of the San Felipe escaped fire and others, such as in Cuyamaca Rancho State Park and the 2012 Creek Fire in Montana de Oro State Park, must inspire needed change in the current paradigm of seeing chaparral a fuel rather than the valuable natural resource it represents.



Richard W. Halsey  
Director



Dylan M. Tweed  
Conservation Analyst

**Review of requests of CDFW and Cal Fire**

1. Documents detailing protocol for determining the need, efficacy, and ecological impact of vegetation treatment projects.
2. Explanation of how burning the last stand of old-growth chaparral and the re-burning of recovering, decade-old chaparral will “promote the recovery of stand structure, species composition, and wildlife habitat functions of the chaparral...”
3. Clarification of how the Project complied with the 2009 Management Plan’s direction to focus “on the continued recovery of chaparral.”
4. Provide a reasonable scenario in which a fuel treatment in the project area would have an impact on reducing fire risk in the communities of Julian or Shelter Valley.
5. Explain the decision making process in which Cal Fire decided to conduct the burn considering the RAWs measurements and the issuance of a Wind Advisory

**Attachments**

1. May 23, 2013 RAWs data from the Ranchita Station
2. May 23, 2013 National Weather Service Wind Advisory
3. Montana de Oro State Park escaped prescribed burn review



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# Station Summary



NOTE:  
To print data frame (right side), click on right frame before printing.

- [Daily Summary](#)
- [Daily Summary \(with Wind Chill and Heat Index\)](#)
- [Daily Summary Time Series](#)
- [Monthly Summary](#)
- [Monthly Summary \(w/ Et data\)](#)
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- [Graph of last 7 days](#)
- [Time Series Graph](#)
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- [Data Lister](#)
- [Data Inventory \(Monthly Graphic\)](#)
- [Station Metadata and Photos](#)
- [Current 7-day forecast \(NWS\) \(May not work correctly for some Central and Southern U.S. states.\)](#)
- Climate Summary Info
- 
- [Wind Rose Climatology](#)

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

## Ranchita California

Daily Summary for

**May 23, 2013**

| Hour of Day | Total Solar Rad. | Wind Ave. | Wind V. Dir. | Wind Max. | Air Temperature Mean | Fuel Temperature Mean | Fuel Moisture Mean | Relative Humidity Mean | Dew Point | Wet Bulb | Baro. Press. | Total Precip. |
|-------------|------------------|-----------|--------------|-----------|----------------------|-----------------------|--------------------|------------------------|-----------|----------|--------------|---------------|
| Ending at   | ° ly.            | mph       | Deg          | mph       | Deg. F.              | Deg. F.               | Percent            | Percent                | Deg. F.   |          | in. Hg.      | inches        |
| 1 am        | 0.0              | 16.0      | 270          | 31.0      | 52.0                 | 51.0                  | 4.8                | 16                     | 7         | 36       |              | 0.00          |
| 2 am        | 0.0              | 14.0      | 266          | 25.0      | 49.0                 | 46.0                  | 5.1                | 60                     | 36        | 42       |              | 0.00          |
| 3 am        | 0.0              | 13.0      | 283          | 22.0      | 52.0                 | 46.0                  | 5.5                | 65                     | 41        | 46       |              | 0.00          |
| 4 am        | 0.0              | 10.0      | 272          | 19.0      | 42.0                 | 40.0                  | 5.8                | 80                     | 36        | 39       |              | 0.00          |
| 5 am        | 0.4              | 14.0      | 272          | 18.0      | 47.0                 | 44.0                  | 6.4                | 49                     | 29        | 39       |              | 0.00          |
| 6 am        | 10.8             | 12.0      | 260          | 20.0      | 51.0                 | 50.0                  | 6.9                | 34                     | 24        | 39       |              | 0.00          |
| 7 am        | 29.9             | 12.0      | 263          | 20.0      | 55.0                 | 55.0                  | 7.0                | 31                     | 25        | 41       |              | 0.00          |
| 8 am        | 48.5             | 15.0      | 272          | 22.0      | 59.0                 | 63.0                  | 6.7                | 20                     | 18        | 41       |              | 0.00          |
| 9 am        | 64.8             | 16.0      | 273          | 24.0      | 62.0                 | 70.0                  | 6.3                | 19                     | 19        | 43       |              | 0.00          |
| 10 am       | 77.0             | 17.0      | 274          | 27.0      | 64.0                 | 75.0                  | 5.8                | 21                     | 23        | 45       |              | 0.00          |
| 11 am       | 84.4             | 16.0      | 279          | 25.0      | 66.0                 | 79.0                  | 5.2                | 24                     | 28        | 47       |              | 0.00          |
| 12 pm       | 87.0             | 17.0      | 266          | 26.0      | 67.0                 | 81.0                  | 4.7                | 24                     | 29        | 48       |              | 0.00          |
| 1 pm        | 85.1             | 17.0      | 276          | 26.0      | 68.0                 | 81.0                  | 4.5                | 25                     | 31        | 49       |              | 0.00          |
| 2 pm        | 78.3             | 19.0      | 263          | 26.0      | 67.0                 | 79.0                  | 4.1                | 28                     | 33        | 49       |              | 0.00          |
| 3 pm        | 66.7             | 22.0      | 269          | 33.0      | 65.0                 | 75.0                  | 4.2                | 33                     | 35        | 49       |              | 0.00          |
| 4 pm        | 51.3             | 21.0      | 276          | 32.0      | 63.0                 | 70.0                  | 4.4                | 34                     | 34        | 48       |              | 0.00          |
| 5 pm        | 33.2             | 17.0      | 280          | 30.0      | 60.0                 | 65.0                  | 4.6                | 40                     | 36        | 47       |              | 0.00          |
| 6 pm        | 15.3             | 14.0      | 286          | 24.0      | 56.0                 | 58.0                  | 4.9                | 49                     | 37        | 46       |              | 0.00          |
| 7 pm        | 1.5              | 13.0      | 287          | 19.0      | 52.0                 | 50.0                  | 5.3                | 68                     | 42        | 46       |              | 0.00          |
| 8 pm        | 0.0              | 12.0      | 292          | 16.0      | 55.0                 | 51.0                  | 6.1                | 68                     | 45        | 49       |              | 0.00          |
| 9 pm        | 0.0              | 11.0      | 275          | 20.0      | 54.0                 | 51.0                  | 6.4                | 26                     | 20        | 39       |              | 0.00          |
| 10 pm       | 0.0              | 11.0      | 280          | 16.0      | 50.0                 | 46.0                  | 6.7                | 71                     | 41        | 45       |              | 0.00          |
| 11 pm       | 0.0              | 10.0      | 280          | 17.0      | 50.0                 | 47.0                  | 6.8                | 42                     | 28        | 40       |              | 0.00          |
| 12 am       | 0.0              | 11.0      | 283          | 17.0      | 53.0                 | 48.0                  | 7.3                | 38                     | 28        | 41       |              | 0.00          |

### DAILY STATISTICS

| Total Solar Rad. | Wind Ave. | Wind V. Dir. | Wind Max. | Air Temperature Mean | Fuel Temperature Mean | Fuel Moisture Mean | Relative Humidity Mean | Dew Point | Wet Bulb | Baro. Press. | Total Precip. |
|------------------|-----------|--------------|-----------|----------------------|-----------------------|--------------------|------------------------|-----------|----------|--------------|---------------|
| ° ly.            | mph       | Deg          | mph       | Deg. F.              | Deg. F.               | Percent            | Percent                | Deg. F.   |          | in. Hg.      | inches        |
| Total 734.1      |           |              |           |                      |                       |                    |                        |           |          |              | 0.00          |
| Ave.             | 14.6      | 275          |           | 56.6                 | 59.2                  | 5.6                | 40                     | 30        | 44       |              |               |
| Max.             |           |              | 33.0      | 68.0                 | 81.0                  | 7.3                | 80                     |           |          |              |               |
| Min.             |           |              |           | 42.0                 | 40.0                  | 4.1                | 16                     |           |          |              |               |

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NOTES:

- Daily averages might vary slightly from the average of the hourly values printed due to rounding of the hourly values.
- Data are subject to further review and editing. Please refer any questions to the Western Regional Climate Center.

° 1 ly = 1 cal/cm<sup>2</sup> = 4.1855 J/cm<sup>2</sup> = 3.6855 BTU/ft<sup>2</sup> = .01163 KW-hr/m<sup>2</sup>

# Wind Advisory



Map DataMap data ©2013 Google, INEGI - [Terms of Use](#)  
Map data ©2013 Google, INEGI

**Effective:** May 23 2013 03:18 AM PDT

**Expires:** May 24 2013 03:00 AM PDT

**Warning:**

**Certainty:** Likely

**Urgency:** Expected

**Severity:** Minor



...GUSTY WEST WINDS FOR THE MOUNTAINS AND DESERTS FOR THIS AFTERNOON THROUGH LATE TONIGHT... .A TROUGH OF LOW PRESSURE NEAR THE WEST COAST WILL MAINTAIN STRONGER ONSHORE FLOW WITH GUSTY WEST WINDS IN THE MOUNTAINS AND DESERTS FOR THIS AFTERNOON THROUGH LATE TONIGHT. ...WIND ADVISORY IN EFFECT FROM 3 PM THIS AFTERNOON TO 3 AM PDT FRIDAY... THE NATIONAL WEATHER SERVICE IN SAN DIEGO HAS ISSUED A WIND ADVISORY...WHICH IS IN EFFECT FROM 3 PM THIS AFTERNOON TO 3 AM PDT FRIDAY. \* WINDS...AREAS OF WEST WINDS 20 TO 30 MPH WITH GUSTS TO 45 MPH. ISOLATED GUSTS TO 55 MPH. \* LOCATION...NEAR MOUNTAIN RIDGE TOPS AND ALONG DESERT MOUNTAIN SLOPES EXTENDING INTO ADJACENT DESERT AREAS. STRONGEST WINDS IN THE NORTHERN COACHELLA VALLEY AND NEAR THE RIDGE TOPS OF THE SAN DIEGO COUNTY MOUNTAINS. \* TIMING...STRONGEST WINDS FOR LATE THIS AFTERNOON THROUGH LATE THIS EVENING...THEN GRADUALLY SUBSIDING TOWARDS FRIDAY MORNING. \* VISIBILITY...IN THE DESERTS LOCALLY REDUCED IN BLOWING SAND AND BLOWING DUST. \* IMPACTS...THE WINDS WILL MAKE DRIVING DIFFICULT...ESPECIALLY FOR MOTORISTS WITH HIGH PROFILE VEHICLES. \* OUTLOOK...GUSTY WEST WINDS WILL CONTINUE EACH LATE AFTERNOON THROUGH LATE EVENING THROUGH THE HOLIDAY WEEKEND.

A WIND ADVISORY MEANS THAT WINDS OF 35 MPH ARE EXPECTED. WINDS THIS STRONG CAN MAKE DRIVING DIFFICULT...ESPECIALLY FOR HIGH PROFILE VEHICLES. USE EXTRA CAUTION.

**Locations Affected:** Coachella Valley; Riverside County Mountains; San Diego County Deserts; San Diego County Mountains

**ZIP Codes Affected:**

- [91752 - Mira Loma, CA](#)
- [91901 - Alpine, CA](#)
- [91902 - Bonita, CA](#)
- 91903 - Alpine, CA
- [91905 - Boulevard, CA](#)
- [91906 - Campo, CA](#)
- 91908 - Bonita, CA
- 91909 - Chula Vista, CA
- 91910 - Chula Vista, CA
- [91911 - Chula Vista, CA](#)
- 91912 - Chula Vista, CA
- [91913 - Chula Vista, CA](#)
- [91914 - Chula Vista, CA](#)
- [91915 - Chula Vista, CA](#)
- [91916 - Descanso, CA](#)
- [91917 - Dulzura, CA](#)
- 91921 - Chula Vista, CA

- [91931 - Guatay, CA](#)
- [91932 - Imperial Beach, CA](#)
- 91933 - Imperial Beach, CA
- [91934 - Jacumba, CA](#)
- [91935 - Jamul, CA](#)
- [91941 - La Mesa, CA](#)
- [91942 - La Mesa, CA](#)
- 91943 - La Mesa, CA
- 91944 - La Mesa, CA
- [91945 - Lemon Grove, CA](#)
- 91946 - Lemon Grove, CA
- 91947 - Lincoln Acres, CA
- [91948 - Mount Laguna, CA](#)
- [91950 - National City, CA](#)
- 91951 - National City, CA
- [91962 - Pine Valley, CA](#)
- [91963 - Potrero, CA](#)
- 91976 - Spring Valley, CA
- [91977 - Spring Valley, CA](#)
- [91978 - Spring Valley, CA](#)
- 91979 - Spring Valley, CA
- [91980 - Tecate, CA](#)
- 91987 - Tecate, CA
- [92003 - Bonsall, CA](#)
- [92004 - Borrego Springs, CA](#)
- [92007 - Cardiff By The Sea, CA](#)
- [92008 - Carlsbad, CA](#)
- [92009 - Carlsbad, CA](#)
- 92010 - Carlsbad, CA
- 92011 - Carlsbad, CA
- 92013 - Carlsbad, CA
- [92014 - Del Mar, CA](#)
- 92018 - Carlsbad, CA
- [92019 - El Cajon, CA](#)
- [92020 - El Cajon, CA](#)
- [92021 - El Cajon, CA](#)
- 92022 - El Cajon, CA
- 92023 - Encinitas, CA
- [92024 - Encinitas, CA](#)
- [92025 - Escondido, CA](#)
- [92026 - Escondido, CA](#)
- [92027 - Escondido, CA](#)
- [92028 - Fallbrook, CA](#)
- [92029 - Escondido, CA](#)
- 92030 - Escondido, CA
- 92033 - Escondido, CA

- [92036 - Julian, CA](#)
- 92037 - La Jolla, CA
- 92038 - La Jolla, CA
- 92039 - La Jolla, CA
- [92040 - Lakeside, CA](#)
- 92046 - Escondido, CA
- 92049 - Oceanside, CA
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## **The 2012 Creek Fire - An Escaped Cal Fire Prescribed Burn Montana de Oro State Park, San Luis Obispo County, California**

An analysis by the California Chaparral Institute  
June 12, 2013

Montana de Oro State Park is a beautiful example of a coastal shrubland ecosystem, much of it covered by northern coastal sage scrub. Cal Fire, however, views this habitat primarily as fuel that needs to be managed. Thus a burn plan has been implemented to reduce the “fuel.”

Cal Fire's official justification for the prescribed burn it conducted on November 12, 2012, included the following:

The burn is being conducted as part of Cal Fire's vegetation management program and is intended to reduce hazardous vegetation and wildland fuels as well as provide defensible space to PG&E infrastructure in an area considered to be at high risk for large and damaging wildfires, according to the agency.

- San Luis Obispo Tribune

The burn site is a long way from any PG&E facilities, but it could be seen as a logical extension of Cal Fire's ongoing burn plan for the area.

Cal Fire's own fire history database shows that this coastal area has a low incidence of fires, and has not had a large one since records have been kept. The extremely moist marine climate and geographic isolation contribute to this. But a lot of small to medium-sized fires have started on PG&E land. The biggest on record is close to 1,800 acres in the fall of 1982, which started right at the power plant. No causes are indicated in the database, but they are probably accidental since these ignitions are clustered near some of PG&E's infrastructure.

Cal Fire has conducted several burns since 2009. The ones in 2012 were several hundred acres each.

The November 12, 430 acre prescribed burn was on a combination of State Park and PG&E property in the watershed where their property boundary lies. The intent was to hold the fire at Coon Creek Trail on the northwest flank. Unfortunately, the fire escaped the next day and slopped-over the intended boundary and burned an additional 103 acres.

After the fire jumped containment lines and burned onto state park land, Cal Fire Information Officer (FIO) Es Berliner had this to say:

“Prescribed burns are very valuable for land management. If there is a wildfire, prescribed burns create a line of containment to stop the fire from coming into town.”

This would make sense if the site of the burn were near town. San Luis Obispo is more than ten miles away. Or if winds that could drive big fire weather would blow towards town instead of out to sea. Or if firefighters were land managers. But Cal Fire's fire history database shows nine fires on PG&E's land and only one on the state park. So theoretically this treatment could help



keep fires starting on PG&E land off the state park land. If so, then Cal Fire burned up a significant amount of the state park while implementing their plan to protect the park from fire.

As hundreds of additional firefighters poured to catch the 103-acre slop-over, the FIO contributed to another news cycle:

Berliner described the incident as “freakish.” She said officials plan carefully for all contingencies and they simply did not anticipate the ferocity of the winds. “Mother Nature — you can’t control it,”

Although there is not a [Climate Center weather station](#) at Montana de Oro, the nearby stations (Las Tablas, Arroyo Grande, and Vandenberg) do not show any “freakish” ferocity in the wind on the day the fire got out of control (11/13/12). Unexpected wild weather does occur sometimes of course, but Cal Fire has a lot of experience watching and anticipating the weather.

Did the prescribed burn get out of control because part of the established “prescription” was not followed? Several fire managers/scientists we have talked with were surprised the escape happened considering the excellent weather forecasting personal available at the time. They did, however, cite situations where rules were bent in the past to conform with staffing restrictions and desires. Once a project is lined up, staff is on the ground, and engines are ready, there is significant pressure to go ahead with a burn despite the fact that the “prescription” is not exactly as described on paper. Changing staff and continuing to pay for folks on the ground can be inconvenient as well as expensive. Trying to get the logistics, the weather, and the “fuel” conditions all in line before everything changes is easier said than done.

Analyzing the fire scar on Google Earth and comparing the reported fire perimeter and the apparent tactics suggested by placement of those lines, it appears there were another five slop-overs of various sizes scattered all around the perimeter of the fire. The largest one at the south end of the burn area is almost as big as the slop-over on state park land at the north end. Cal Fire appears to have had repeated and ongoing problems with slop-overs. But they apparently continued to burn even though they were having a whole series of small to medium-sized containment problems before the big one on the state park land that could not be ignored. This is speculation on our part, but it's hard to deny the reality of the events, based on the satellite photo and fire perimeter evidence.

One of the biggest impacts from the escaped fire at Montana de Oro (other than the reportedly extra half million spent on suppression) may be that while Cal Fire planned to hold the fire at a trail, the agency ended up having to cut 1.6 miles of hand-lines through fairly pristine coastal sage scrub to contain the slop-over in addition to heavily impacting the Coon Creek Trail. The associated soil disturbance will make the area vulnerable to the invasion of non-native weeds, and hence increase the chance of future ignitions due to the flashy fuels (weeds).

So in the end we have a compromised ecosystem that is one of the key features of a state park caused by a questionable “fuel” treatment that did not appear necessary to protect lives and property.

## OFFICIAL CAL FIRE INFORMATION ON THE INCIDENT

### Creek Fire

#### Creek Fire Incident Information:

|                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |              |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| <b>Last Updated:</b>               | November 15, 2012 8:15 am                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>FINAL</b> |
| <b>Date/Time Started:</b>          | November 13, 2012 2:15 am                                                                                                                                                                                                                                                                                                                                                                                                                                           |              |
| <b>Administrative Unit:</b>        | CAL FIRE San Luis Obispo Unit                                                                                                                                                                                                                                                                                                                                                                                                                                       |              |
| <b>County:</b>                     | San Luis Obispo County                                                                                                                                                                                                                                                                                                                                                                                                                                              |              |
| <b>Location:</b>                   | North side of Coon Creek in the Montana de Oro State Park                                                                                                                                                                                                                                                                                                                                                                                                           |              |
| <b>Acres Burned - Containment:</b> | 100 acres                                                                                                                                                                                                                                                                                                                                                                                                                                                           |              |
| <b>Estimated Containment</b>       | 100 acres - <b>100%</b> contained                                                                                                                                                                                                                                                                                                                                                                                                                                   |              |
| <b>Structures Threatened:</b>      | There is no current threat to infrastructure                                                                                                                                                                                                                                                                                                                                                                                                                        |              |
| <b>Cooperating Agencies:</b>       | California State Parks, US Forest Service                                                                                                                                                                                                                                                                                                                                                                                                                           |              |
| <b>Total Fire Personnel:</b>       | 145 personnel                                                                                                                                                                                                                                                                                                                                                                                                                                                       |              |
| <b>Total Fire Engines:</b>         | 9 engines                                                                                                                                                                                                                                                                                                                                                                                                                                                           |              |
| <b>Total Fire crews:</b>           | 6 crews                                                                                                                                                                                                                                                                                                                                                                                                                                                             |              |
| <b>Total Water Tenders:</b>        | 1 water tender                                                                                                                                                                                                                                                                                                                                                                                                                                                      |              |
| <b>Conditions:</b>                 | <p>While conducting a vegetation management project burn in the Montana de Oro State Park, stronger than expected off-shore winds fanned the prescribed fire onto the north side of Coon Creek.</p> <p>The 430 acre prescribed fire was being conducted to improve wildlife habitat health, improve range for cattle and to reduce the impacts of a wildland fire by burning old overgrown vegetation. Prescribed Fire is an important part of land management.</p> |              |

## Fire near Montaña de Oro is 100 percent contained, Cal Fire says

Published: November 12, 2012

Read more here: <http://www.sanluisobispo.com/2012/11/12/2293224/fire-montana-de-oro-smoke.html##storylink=cpy>

The prescribed burn is being conducted on 430 acres on remote and hilly land north of Diablo Canyon nuclear power plant

By Tribune staff — [newsroom@thetribunenews.com](mailto:newsroom@thetribunenews.com)

**UPDATE: 5:25 a.m. Thursday:** The Creek Fire at Montaña de Oro State Park is now 100 percent contained, according to a news release from Cal Fire.

Firefighters will remain in the area patrolling and mopping up.

**UPDATE: 4:10 p.m. Wednesday:** The Creek Fire at Montaña de Oro State Park is now 75 percent contained, according to a news release from Cal Fire. One firefighter suffered a minor injury.

**UPDATE: 5:30 a.m. Wednesday:** Fire officials say they now have 60 percent containment of a 100-acre fire near Montana de Oro that occurred after a prescribed burn jumped a containment line.

Firefighters worked through the night to contain the Creek Fire, according to a news release from Cal Fire. Offshore winds were strong, but firefighters were able to prevent the fire from spreading further.

Full containment is expected Thursday.

“It was a cold wind out there last night but the firefighters kept working on the steep slopes to put this fire out,” Cal Fire Chief Robert Lewin was quoted in the news release as saying.

**UPDATE 3:25 p.m. Tuesday:** Fire crews are still aggressively fighting a 100-acre fire that occurred after a prescribed burn jumped a containment line this morning, costing an approximate \$500,000.

The fire outside the original containment area is now 30 percent contained, according to a Cal Fire news release. Rob Lewin, County/Cal Fire chief, said he was optimistic that crews would be able to stop the fire from spreading any further by tonight. The high winds that led to the fire jumping the containment line have now diminished but could come back, Lewin said.

There are 450 fire personnel on scene fighting the fire. Only 150 fire personnel were planned to be onsite for the 430-acre prescribed burn.

The fire is not threatening any structures, campgrounds or protected natural resources.

The prescribed fire is on track and all fire lines are secured, said Lewin.

**UPDATE 12:09 p.m. Tuesday:** A planned fire that grew out of control near Montana de Oro is 15 percent contained and should be completely subdued by Friday, according to a Cal Fire spokeswoman.

Es Berliner, speaking for Cal Fire, added that there is no damage to structures and no threat to people.

The prescribed burn jumped a containment line early this morning and ignited 100 additional acres. Of that, 15 percent is under control, and the rest on its way to being contained, Berliner said shortly before noon.

She said 325 firefighters from various agencies are fighting the blaze.

Berliner called the incident “freakish.” She said officials plan carefully for all contingencies and they simply did not anticipate the ferocity of the winds. “Mother Nature — you can’t control it,” she said.

**UPDATE 10:18 a.m. Tuesday:** A prescribed burn in the Coon Creek area of Montaña de Oro State Park jumped a containment line early this morning and has burned 45 acres of additional land.

The escape occurred in the northern Coon Creek area at about 3:50 a.m. due to high winds. The agency has contingency plans for such incidents, and the fire is expected to be brought back into containment later today, said Es Berliner, Cal Fire spokeswoman.

The burn is being conducted on 430 acres over two days on remote and hilly land owned by State Parks land and Pacific Gas and Electric Co. north of Diablo Canyon nuclear power plant. The burn has created a large plume of smoke that is visible from much of San Luis Obispo County.

“Prescribed burns are very valuable for land management,” Berliner said. “If there is a wildfire, prescribed burns create a line of containment to stop the fire from coming into town.”

**UPDATE 3:31 p.m.** Cal Fire officials have called out additional units to help with a prescribed burn this afternoon in and around Montaña de Oro state park.

There are currently 13 engines on scene, plus a water tender, two bulldozers, three hand crews and a fixed-wing aircraft, said Cal Fire Communications Operator Patricia Grisham.

The burn was about 50 percent complete and within containment lines about 2:45 p.m., according to [a tweet](#) the agency posted on its Twitter account.

The additional units were called out to help when the wind picked up this afternoon.

Grisham said she expects the burn to continue into Tuesday. She said Cal Fire has received calls from numerous local residents about the smoke.

**UPDATE 10:42 a.m.** Cal Fire has started a 430-acre prescribed burn in Montaña de Oro. The burn will take place in the state park as well as on PG&E property.

The agency posted two photos about 10:30 a.m. of the burn on its Twitter page at [https://twitter.com/CALFIRE\\_SLO](https://twitter.com/CALFIRE_SLO).

**Original story:** Cal Fire will conduct a 430-acre prescribed burn today or Tuesday in conjunction with PG&E and the state parks and recreation department.

The burn is located on PG&E property and in Montaña de Oro state park in the Coon Creek area, according to a Cal Fire news release. The final burn date will be dependent in part on the weather.

Some private and public trails near the burn will be closed as well as Pecho Valley Road south of Spooners Cove.

Six fire engines, one bulldozer, three fire crews and one helicopter will be assigned to the burn.

The burn is being conducted as part of Cal Fire's vegetation management program and is intended to reduce hazardous vegetation and wildland fuels as well as provide defensible space to PG&E infrastructure in an area considered to be at high risk for large and damaging wildfires, according to the agency.

Residents in the Morro Bay and Five Cities area and those traveling near the coast may see smoke from 10 a.m. to 6 p.m. on the day of the burn.

County officials urge people to take precautions and use common sense to reduce harmful health effects by limiting outdoor activities.

The prescribed burn is being coordinated with the San Luis Obispo County Air Pollution Control District and the California Air Resources Board in order to minimize the smoke impacts on surrounding communities.

The project is dependent on weather and will be carried out during favorable conditions that provide adequate consumption and smoke dispersal. If the conditions are not favorable, the burn will be rescheduled.