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166 Greenwood Avenue  
San Rafael, CA 94901

February 1, 2021

San Rafael City Council  
1400 Fifth Avenue  
San Rafael, CA 94901

**Re: Vegetation Management Ordinance Amendment**

Honorable Mayor and Council Members,  
Sustainable San Rafael supports applying the Vegetation Management Ordinance throughout San Rafael. However, we recommend that the following key items in the revised ordinance be clarified to avoid unnecessary removal of plants:

1. In item A4 the term “combustible vegetation” needs to be capitalized to indicate that it is a defined term in the definitions section of the underlying ordinance, and as such is limited to a few especially problematic plant species (like those listed in item B5). Otherwise, vast amounts of vegetation could mistakenly be removed, at great expense and with devastating impacts on the character and environmental quality of our city.
2. Item A5 should be simplified to “maintain vegetation to provide a minimum clearance of 13 feet six inches over all roadways.”
3. To avoid confusion, item B1 needs to include this language from the staff report: “Appropriate defensible space *does not require, or advocate, the clear cutting of trees and brush, but rather horizontal and vertical spacing and maintenance.* A continuous canopy of fire-resistant trees may be desirable in some Intermediate or Extended zones to create shade (sometimes referred to as a “shaded fuel-break”) which acts to suppress weeds and grasses (flash fuels) and help retain moisture.”

Since protecting homes and other buildings from the threat of wildfire is the primary purpose of the Wildfire Action Plan, we welcome the City’s intention to rapidly pursue adoption of the “home hardening” measures in the Plan. Such simple structural changes have proven more effective than vegetation management in protecting properties and avoiding release of the large amounts of carbon embedded in buildings.

We also suggest that the City work closely with the Ecologically Sound Practices Partnership and Marin Wildfire Protection Authority to develop and distribute materials to help homeowners maintain their properties in ways that foster fire safety along with ecological and climate benefits.

Thank you for your consideration of the key details listed above.

Sincerely,

William Carney  
Board President