

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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February 15, 2019

Midpeninsula Regional Open Space District
Board of Directors
330 Distel Circle
Los Altos, CA 94022

RE: Prescribed Fire Program and
Non Fire-Fuels Reduction

Dear Board of Directors,

The Woodside Fire Protection District (WFPD) and CAL FIRE are both enthusiastic about continuing to work collaboratively with Midpeninsula Regional Open Space District (MROSD) after hearing the comments during the February 13, 2019 MROSD Board of Directors' meeting. The comments of the board and staff reflected a positive initiative in wildfire risk reduction by increasing hazardous fuels reduction activities and expanding forest restoration and health in MROSD preserves.

As climate change propels California into a new realm of wildfire incidents, we are all forced to take on new and improved wide scale prevention initiatives. Forest management and hazardous fuels reduction, within high fire severity zones of San Mateo County, has been placed on the highest level of priority by the SMC Board of Supervisors, SMC Parks, governing officials of the Town of Woodside, Town of Portola Valley, the jurisdictional fire agencies and the residents who live in these high-risk areas. The last two years of devastating California wildfires and record number of structures and human lives lost has initiated immediate wildfire prevention reform. We all acknowledge that left untreated and unmanaged, hazardous vegetation only increases fire intensity and rate of spread in our forested land, parks, open space and private residential property.

MROSD is responsible for at least fourteen open space preserves in San Mateo County, encompassing over 28,000 acres in high fire severity zones. Single family homes by the thousands border many of these preserves. MROSD is well situated for a large-scale prevention effort with plentiful staff, ample budgets and willing local collaborators to address this immediate need for fire fuels reduction and fire hardening on the lands it stewards. CAL FIRE and the WFPD are staunch advocates that our boundaries be as resilient to wildfire as possible. We believe that the MROSD Board of Directors' and General and Assistant Manager's recent re-focus of their strategic objectives on fire fuels management shows a commitment that is sadly missing in many other organizations. We commend your willingness to align with

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the new priorities of the local community by recently approving the MROSD fiscal year 2019-20 strategic plan with specific objectives to work with local fire agencies and surrounding communities on prevention and wildfire risk reduction.

Fire prevention and fire fuels reduction, presents several mechanisms to choose from for implementation. MROSD has recently identified prescribed fire as a program in which it would like to re-develop as part of its fuels reduction program. CAL FIRE is committed to having discussions with MROSD and its contractors, SIG and Panorama, on how and where prescribed fire may possibly best be utilized. We agree that implementation of any prescribed burning would require CAL FIRE as the lead agency to issue the required permits. The Woodside Fire Protection District, by adopted ordinance, does not allow any open burning within its District boundaries. Also problematically, the preserves which reside in the WFPD; Teague Hill, Thornewood, Hawthorne and portions of Windy Hill, are situated in close proximity to numerous homes and do not appear suitable for prescribed fire activities. These preserves will likely need to undergo *non-fire fuels reduction* with potential for varying means of implementation, including hand crews, pile burning, grazing and or mechanical methods.

There presently exists a degree of concern within the community, which is shared by WFPD and CAL FIRE, that MROSD has previously underestimated the number of district owned acres requiring fuel reduction projects and forest restoration work for wildfire risk reduction and forest health management. This is especially the case in preserves where homes and critical infrastructure are adjacent. We applaud MROSD staff's goal to amend the current EIR to include the addition of the prescribed fire program to increase the total acreage of fuel reduction. Given the amount of time it is expected to take for the EIR to be approved (2-3 years) and the current urgency for fuel reduction work to be completed, we encourage the district to also consider other options with its cooperators to make their lands more fire resilient while working through the EIR process.

One option is to evaluate and upgrade deferred maintenance or maintenance protocols for treating fuel from downed and dead vegetation such as fallen trees and branches along roadways and accessible trails. Instead of being pushed to the side of roadways or trails and allowed to accumulate as large piles of hazardous fuel, MROSD should implement treating these fuels by methods such as chipping, loping, pile burning and mastication for all downed and dead vegetation as part of an ongoing maintenance program. CEQA and EIR exemptions are allowed for ongoing maintenance and by addressing these hazardous fuel concerns, MROSD could drastically reduce the amount of dead fuels allowed to accumulate especially on roadways and the larger accessible trails which are important emergency access routes for all emergency responders. This should be considered the low hanging fruit of a fire prevention and wildfire risk reduction initiative.

Fire Chiefs from both CAL FIRE and WFPD encourage MROSD to include in its proposed "Pre-plans" maps which include critical infrastructure and specific preserve locations in close proximity to homes. These maps may also assist in identifying future beneficial fuels reduction projects. In addition, the GIS data generated by this effort could be beneficial if shared with the local fire agencies for improved fire mapping. Instead of having multiple maps of individual ownerships, the objective is to have comprehensive data, in digital form, available in one GIS as a region wide dataset which can be made available in the field on mobile platforms.

WFPD and CAL FIRE would like to be part of the interdisciplinary team MROSD has developed to reduce fuels and address wildfire risk. We are requesting a meeting be organized to visit a few preserves to better evaluate essential criteria for fuel reduction and forest restoration. We are requesting that this meeting include at a minimum, a member of the MROSD Board of Directors', a MROSD planning representative as well as the GM and Assistant GM.

We look forward to working collaboratively in reducing the wildfire risk in our inimitable open space lands in which MROSD has committed to steward on behalf of San Mateo County residents.

Sincerely,



Rich Sampson
Division Chief
Cal Fire San Mateo – Santa Cruz Unit



Denise Enea
Fire Marshal
Woodside Fire Protection District

cc. Dan Ghorso, Fire Chief WFPD
Ian Larkin, Fire Chief Cal Fire San Mateo-Santa Cruz Unit
Jeremy Dennis, Portola Valley Town Manager
Kevin Bryant, Woodside Town Manager
Don Horsley, Board of Supervisor SMC
Dan Belville, Director Public Safety Communications, SMC
Ana Maria Ruiz, General Manger MROSD
Brian Malone, Assistant General Manager, MROSD

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Midpeninsula Regional
OpenSpace

Midpeninsula Regional Open Space District

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BOARD OF DIRECTORS
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Curt Riffle
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Larry Hassett
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RE: Prescribed Fire Program and Non Fire-Fuels Reduction

Dear Division Chief Sampson and Fire Marshal Enea,

Thank you for your support of the Midpeninsula Regional Open Space District (Midpen) expanding its vegetation management activities to continue to address and enhance wildland fire resiliency on the San Francisco Peninsula. Midpen recognizes the risks and challenges faced by communities within the Wildland-Urban Interface (WUI).

As land stewards, fire safety has always been a critical component of our work. To reduce the risk of wildland fires, Midpen:

- Maintains hundreds of miles of fuel breaks and fire roads;
- Reduces fuels on 8,500 acres of grassland with grazing;
- Strictly enforces no smoking and fire regulations;
- Educates visitors about fire safety;
- Follows maintenance practices to minimize risk of ignition;
- Provides a defensible space clearing permit program to neighbors who own structures adjacent to our Preserves; and
- Works with communities on escape routes.

Midpen also works to complement the local fire agencies responsible for fire suppression by: training its staff on wildland fire suppression to act as fire first responders; providing staff with required safety equipment; equipping ranger trucks with water pumpers and fire tools; evacuating visitors from preserves during an emergency; providing fire suppression agencies with local knowledge of preserves; and coordinating closely with incident commanders during a response to wildland fires.

Midpen's Board of Directors formally recognized the need to quickly and proactively adapt to California's intensified wildfire season by updating their Fiscal Year 2019-20 Strategic Plan Objectives to include the following directive to staff: *Work with fire agencies and surrounding communities to strengthen the prevention of, preparation for, and response to wildland fire.*

In response to this highlighted goal and objective, staff are working to create a more robust, strategic, and comprehensive fire management plan: the Wildland Fire Resiliency Program (Program). This work began in July of 2018. Midpen staff have been coordinating with fire agencies such as CalFire, since December of 2018, on our new Program. Through a comprehensive and collaborative effort with Midpen's fire ecologists, we will:

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- Identify the highest risk areas on Midpen lands;
- Accelerate fuels reduction projects;
- Create fire response pre-plans for each preserve;
- Identify where prescribed fire can be used as a tool; and
- Efficiently undertake the California Environmental Quality Act process to guide informed decisions that protect the environment.

Fire is a natural part of wildland areas and the District plays a crucial role in keeping fire prone areas as undeveloped open spaces to limit the potential fire risk and exposure to people. The Santa Cruz Mountains are part of the California Floristic Province and recognized as one of 36 biological hotspots in the world, with extraordinarily high biodiversity, including many rare, threatened and endangered species that the public has entrusted in our care. Biological hotspots support nearly 60% of the world's plant, bird, mammal, reptile, and amphibian species while taking up just 2.3% of the land surface area of the world. As such, any work in wildland areas, including Midpen's 26 Open Space Preserves, warrants a great degree of sensitivity to potential ecological impacts. The Program will allow Midpen to accomplish fuel reduction work and reduce fire risk to neighboring communities while ensuring that natural resources are protected.

Midpen is starting a pilot restoration forestry project in La Honda Creek Open Space Preserve that aims to thin redwood forests to promote growth of the largest trees. This project has the potential to increase carbon storage, reduce fuel loads, reduce fire risk, improve fire resiliency within the forest, and serve as an example for future projects.

Prescribed fire can also be an effective tool to manage fire risk and will only be considered after Midpen has gone through an extensive review process that incorporates public input and scientific analysis. We will only pursue prescribed fire with the support of Cal Fire and we will seek approval from the fire agency that has jurisdiction over the preserves where a prescribed fire is considered before conducting any burns.

We agree that increasing our vegetation clearing and fuel reduction work along existing roads is a good strategy to increase fuel reduction work prior to the development of the Program and subsequent CEQA review. Midpen will be emphasizing increased maintenance of fire roads, which has already been evaluated under our Integrated Pest Management CEQA, as a method to improve access for firefighters and reduce fuel loads near trails. Midpen currently follows the maintenance protocols described in your letter to treat fuel from downed and dead vegetation along roadways and trails. Midpen's standard vegetation management practice along roads and trails is to chip, lop, or masticate brush and trees that are cleared from the road and trail corridor.

Midpen will continue to work with the fire jurisdictions in the creation of preserve fire response pre-plans. Our Program will accelerate the development of these plans. Our intent is to provide these pre-plans to fire agencies for use as a resource when responding to fires to help inform the most effective locations for fighting fire and to locate critical resources like access roads and water. At the same time, they will provide information to help reduce the environmental impacts of firefighting by identifying sensitive resources. While we are unable to create a region-wide data set ourselves, we share your goal of having a region-wide data set available to first responders and will share our internal GIS data with you to help with this goal.

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We understand that preparing for wildfire and enhancing our region's wildland fire resiliency for ecological and human communities is a multifaceted issue requiring each of us to work together. Midpen commends fire agencies such as yours for recommending stricter building standards and laws that help "harden" homes against a wildland fire, as well as updating city planning regulations that determine where and how buildings are constructed in the WUI. Ultimately, actions like these complement fire-related conservation priorities.

I understand that staff have been working with you to set up the meeting you requested in the letter and I look forward to meeting with you to hear your input on how we can work together to reduce wildland fire risk. Midpen will continue reaching out to fire agencies and other stakeholders within our boundaries as we proactively expand our ongoing land management efforts to reduce fire risk and meet the new challenges we are all facing as a result of California's changing climate. Thank you again for your interest and support of a more robust, strategic, and comprehensive fire management plan. We look forward to your continued participation in its development.

Regards,

Pete Siemens
MROSD Board President