Response to Comment
SFPUC Prescribed Burn Project
San Mateo County, California
State Clearinghouse Number # 2021020321

Prepared by:
The California Department of Forestry and Fire Protection
P.O Box 944246 Sacramento, CA 94244-2460

June 18, 2021

The California Department of Forestry and Fire Protection (CAL FIRE) is serving as Lead Agency for California Environmental Quality Act (CEQA) compliance for the above-listed proposed project. An Initial Study/Mitigated Negative Declaration (ISIMND) was prepared, filed at the State Clearinghouse on February 18, 2021, and distributed or made available for a 30-day public and agency review period in conformance with CEQA Guidelines 14 CCR §1510l(b) and §15072(b). The 30-day agency and public review period was originally scheduled to end on March 20, 2021. However, the comment period was extended for an additional 15 days, for a total of 45 days, and ended on April 5, 2021. A total 33 comment letters containing 186 written comments were submitted to the Department. These included 2 letters containing 10 comments from 2 public agencies and 31 letters containing 176 comments from 25 members of the general public. All of these 33 comment letters were given full consideration by the Department. The acronym of the agency (for public agency comments) or the initials of the submitter's first and last name (for public comments) are used to identify each individual comment on the list of comments, and the Department's response to them, which follows.

The 10 written comments from public agencies came from:

- (SFPUC) Tim Ramirez, Division Manager, San Francisco Public Utility Commission, 525 Golden Gate Avenue, 10th Floor, San Francisco, CA 94102.
- (CB) Afshin Oskoui, City Manager, City of Belmont, One Twin Pines Lane, Suite 310, Belmont, CA 94002

The 176 comments from members of the general public came from:

- (CI) Richard Halsey and Deniz Bolbol, The Chaparral Institute, P.O. Box 545, Escondido, CA 92033
- (FKM) Frank and Kristin Mercer, 2535 Somerset Drive, Belmont, CA 94002
- (DB) Deniz Bolbol, 15 Wakefield Court, Belmont, CA 94002
- (KK) Kacey Karmendy, Belmont Heights, CA
- (PS) Pamela Stahl, Belmont, CA
- (GD) Gladwyn d'Souze, Chair, Conservation Committee, Loma Prieta Chapter Sierra Club, San Mateo County, CA.
- (HW) Hawk Lawson
- (JKL) Jennifer and Ken Lien, Paddington Ct, Belmont, CA
- (BS) Bob Stahl, Belmont, CA
- (JNC) Jeff and Natalie Calcagno, 33 Bear Glen Drive, Woodside, CA 94062
- (CB) Christine Beard, 155 Bovet Road, San Mateo, CA 94402
- (MM) Mike Maher, 2801 St. James Road, Belmont, CA 94002
- (KM) Kim Marlow
- (LO) Lynn Olson, 2724 Yosemite Drive, Belmond, CA 94002
- (MPS) Michelle and Paul Speert
- (KH) Karin Hold, Belmont, CA
- (PS) Pamela Stahl
- (JL) Jennifer Lien, Belmont, CA

- (PC) Pat Cuviello, 15 Wakefield Court, Belmond, CA 9400
- (LG) Laurent Gharda, 14 Somerset Ct, Belmond, CA 94002
- (MI) Mimi Iversen, 5 Soho Circle, Belmond, CA 94002
- (SFF) Sonya Felman Foree
- (MC) Michele Cohen, 2601 Wakefield Dr, Belmond, CA 94002
- (JN) January Nice
- (BR) Bob Rush, 116 Wycombe Ave, San Carlos, CA 94070

This document contains CAL FIRE's responses to all substantive comments received during the public review period. Some responses to comments were sent before the close of the comment period and may include outdated information. When applicable, a note has been included before the response to comment to clarify information in the original response which is outdated/inaccurate. A complete copy of each comment letter submitted to the Department is also included. A copy of this document will be sent to each individual comment submitter, will be included as part of the Final CEQA Document, and has become part of the CEQA Administrative Record supporting this project.

Comments from Public Agencies (10)

Comment #1-1 (SFPUC): We are writing to provide our comments, extend our support, and thank CAL FIRE for its efforts related to the Prescribed Burn Project on the San Francisco Public Utilities Commission's (SFPUC) Peninsula Watershed. The Peninsula Watershed is part of our Hetch Hetchy Regional Water System andcollects and stores high quality drinking water for our 2.7 million customers. The Peninsula Watershed is also an important ecological resource for the Bay Area, and we recognize the significance of our role as environmental stewards of its native plants and animals. We are also committed to and invest in the protection of surrounding communities and watershed resources from wildfires.

The Peninsula Watershed is a Hazardous Fire Area and State Responsibility Area (SRA) with CAL FIRE as the legally responsible agency for providing fireprotection. The SFPUC supports vegetation management efforts by CAL FIRE to protect resources, enhance areas for fire suppression, and improve evacuation routes for the Peninsula Watershed's wildland urban interfaces.

We appreciate the collaboration with CAL FIRE as it prepared this Initial Study- Mitigated Negative Declaration, which was made available for public comment on February 18, 2021. This document is the result of almost 20 years of work together with CAL FIRE, and will increase our collective ability to conduct fuel load reduction projects to minimize the risk of catastrophic wildfire and protect surrounding communities, drinking water quality, and the ecological resources within the watershed. We support the project objectives, and implementation will create another opportunity for SFPUC staff to train alongside CAL FIRE, as we do now when conditions allow for prescribed burns on the San Andreas andPilarcitos Dams.

In response to interest from local communities, CAL FIRE hosted a virtual information meeting on March 24, 2021 and provided an overview of the projectand answered questions. In response to these questions, we understand that CAL FIRE now plans to revise and republish the document for an additional 20- day public comment period to provide additional detail and clarify the process that must be completed before the project can be implemented.

We appreciate this effort and believe that providing this additional information and time will allow for greater understanding of the project and its benefits to local communities and to the watershed. We are also grateful for the clarification CAL FIRE has provided to assure local communities that this project will not disrupt the ongoing use of the cross country course operated bythe San Mateo Community College District.

Given the public transportation corridors through the watershed, we anticipate that wildfires will continue to be unintentionally started in the watershed, and that this project and other vegetation management actions will reduce the risk of these small fires from becoming larger and catastrophic. This was our experience with the August 2020 lightning strikes on the watershed, and thanksto the quick support from CAL FIRE and local fire departments responding these small fires were all

quickly extinguished.

Prescribed fire is a vegetation management tool that requires a predefined setof conditions (prescription) to achieve ideal fire behavior and meet the project objectives. We will work closely with CAL FIRE to define the specific project objectives within each burn unit. CAL FIRE as the lead agency will write the prescription for each burn unit to meet the defined objectives and take responsibility to ensure that fuel moisture, ambient temperature, smoke dispersal, wind speed and direction, and relative humidity are all within the prescription written into the burn plan and that conditions are appropriate for each burn.

Response to Comment #1-1: No Response needed.

Comment #1-2 (SFPUC): The SFPUC will complete all pre-burn environmental surveys and post burn vegetation monitoring. The SFPUC will work with CAL FIRE to provide public notifications to adjacent affected communities and jurisdictions and SFPUC wholesale costumers prior to the implementation of a burn. SFPUC will providestaff, water support and equipment to assist the day of each burn

Response to Comment #1-2: CAL FIRE appreciates SFPUC assistance with project implementation, specifically with regards to pre-burn environmental surveys and post-burn vegetation monitoring and invasive plant control.

Comment #1-3 (SFPUC): We support CAL FIRE continuing to use prescribed fire as a tool for vegetation management and fuel reduction to enhance wildfire response and provide safeevacuation routes on the Peninsula Watershed. The proposed SFPUC prescribed burn project has been thoroughly reviewed by the SFPUC staff and we look forward to working with CAL FIRE on its implementation.

Response to Comment #1-3: Thank you for your assistance with review of the proposed project, and we look forward to continuing to work together on beneficial projects on SFPUC lands.

Comment #2-1 (CB): The City of Belmont appreciates the opportunity to provide comments on Initial Study/Mitigated Negative Declaration (IS/MND) for the SFPUC Prescribed Burn Project in San Mateo County.

Specific Expertise of the City of Belmont
CEQA Guidelines section 15086(c) requires that a city's comments be within an "area of expertise" of the city. The City of Belmont, as an agency responsible for general governmental functions, has expertise in the impact areas reviewed in an IS/MND, including, but not limited to, land use, population, employment and housing, transportation and circulation, public services and utilities, hazardous materials, hydrology and water quality, noise, air quality, and energy.

In addition, as an entity that frequently acts as a lead agency in completing environmental documents, the City of Belmont has specific expertise in the requirements imposed by the California Environmental Quality Act and CEQA Guidelines.

Response to Comment #2-1: No response needed.

Comment #2-2 (CB):

- The City of Belmont is supportive of CAL FIRE fuel mitigation/reduction efforts in the City's and adjoining open spaces that complements the ongoing private property defensible space work completed by Belmont residents.

Response to Comment #2-2: CAL FIRE is grateful for the City of Belmont's support for fuel reduction work adjacent to the City.

Comment #2-3 (CB):

- Significant and meaningful recreation areas exist within Belmont that will be affected by the prescribed burn; in particular Plot #6 which encapsulates the Crystal Springs Cross Country Course (CSCCC) located along the most western edge of the City boundary. This public area is widely used by our community and important to both local and regional recreation.

Response to Comment #2-3: CAL FIRE recognizes the importance of the CSCCC to the community. Please see the updated *Recreation* section in the recirculated MND. CAL FIRE is committed to preserving the use of the CSSCC with as little disrupting as possible while still meeting fuel reduction goals.

Comment #2-4 (CB):

- Wildfires know no boundaries. As such, the City of Belmont understands and appreciates the scope/intensity of this project in the effort to mitigate wildfire risk and preserve the watershed; the City expects that the project proponent will be mindful in protecting this community resource from any unnecessary impacts, while also taking into account time of use, and minimizing the loss of public access to this recreation area.

Response to Comment #2-4: See Response to Comment #2-3.

Comment #2-5 (CB):

- The City of Belmont expects that best management practices will be employed for the project inclusive of mitigation to protect endangered flora and fauna, and accidental fire spread.

Response to Comment #2-5: CAL FIRE has developed numerous mitigations in order to protect the flora and fauna of the SFPUC watershed, please see the *Biological Resources* section. CAL FIRE will only conduct prescribed burning when the conditions are safe to do so, and with appropriate fire suppression resources on-site.

Comment #2-6 (CB):

- Transparency in government actions is paramount to Belmont residents and our community's daily work population. Adequate and timely project notification is expected to keep our citizenry informed of the project schedule, anticipated milestones, and completion.

Response to Comment #2-6: CAL FIRE is committed to providing as much public notification as possible prior to implementing prescribed burning in any of the burn units.

Comment #2-7 (CB): The City of Belmont appreciates the opportunity to provide these comments on the Initial Study/Mitigated Negative Declaration (IS/MND) for the SFPUC Prescribed Burn Project in San Mateo County.

The City looks forward to working with CAL FIRE personnel as necessary staff to advance project objectives and implement appropriate mitigation measures for the project as it affects the subject public recreational lands in Belmont.

If you have any questions about this letter, feel free to contact Carlos de Melo, Community Development Director, at (650) 595-7440 or via email at cdemelo@belmont.gov

Response to Comment #2-7: CAL FIRE thanks the City of Belmont for taking the time to comment on this important fuel reduction project.

Comments from Members of the General Public (176)

Comment #3-1 (CI): The California Chaparral Institute is a non-profit scientific and educational organization that focuses on helping communities live safely in California's fire-prone environment in a manner that also protects the natural environment in which neighborhoods are built.

While we concur with the need to reduce fire risk in San Mateo County, we find the rationale and the factual content of the Mitigated Negative Declaration (MND) for the SFPUC Prescribe Burn Project lacking.

Response to Comment #3-1: This comment serves as an introduction. No response is needed.

Comment #3-2 (CI): First and foremost, the neighborhoods adjacent to treatments 3, 4, 5, 6, and 8 all have between 300 to 600 feet of vegetation clearance/management zones between the homesand connecting open space areas. As a consequence, these communities have clearance distances three to six times the recommended 100 feet of defensible space as per PRC 4291. Direct flame impingement does not pose a threat to these communities. The mostlogical evacuation route near these treatment areas is Interstate 280. The amount of vegetation clearance currently along the Interstate already provides adequate mitigationto support safe evacuations.

For treatment area 7, the most reasonable vegetation management activity to secure Skyline Blvd. as a safe evacuation route would be a continuation of the 100-300 footmosaic treatments that are currently in place along the eastern side of the road, not disturbing native habitat for 1,000 feet or more as proposed. The MND does not adequately explain the need for such extensive disturbance.

Response to Comment #3-2: Burn units 3, 4, 5, 6, and 8 do not have between 300 and 600 feet of vegetation clearance/management zones. SFPUC does maintain a fuel break alongside the Belmont Heights neighborhood, among others, however the fuel break is only approximately 50 feet in width. Additionally, the project it not intended to reduce direct flame impingement on structures. The purpose of this project is the management fuel loading in wider areas to help moderate fire behavior and provide fire fighters opportunity to suppress the fire, from an ignition alongside Highway 280 for example. Current vegetation treatments along Highway 280 do not eliminate the possibly of ignitions along the road which may run uphill towards the neighborhoods which will have to be defended by fire fighters. The width of Unit 7 provides fire firefighters with a much more significant area in which to stop fire spread as it approaches Highway 35 then is currently available.

Comment #3-3 (CI): The MND claims, without in-text citations, that,

Historical analysis, including analysis of historical photos, indicates that many areas of the project east of the San Andreas fault were dominated by coastal prairie or oak savannah, with some areas eventually becoming shrub dominated due to the lack of disturbance such as fire.

The MND does not provide adequate analysis to determine what native plant communities would naturally exist in treatment areas 3, 4, 5, 6, and 8. The disturbance suggested in the MND that maintained coastal prairie was likely anthropogenic, such as ranching, rather than a natural fire return interval. Natural fire return intervals are based on lightning frequencies. Coastal California has some of the lowest lightning frequencies in in the western United States, allowing fire free periods of a century or more in some locations.

Therefore, it is highly likely that the current sage scrub habitat in treatment areas 3,4,5,6, and 8 is merely returning to the natural, shrub-dominated condition. The MND currently does not address this possibility.

Since treatment area 7 is on the western side of the San Andreas Fault, the ecological rationale cited in the MND does not apply.

Response to Comment #3-3: The areas where prescribed burning is proposed has no recorded history of fire. Even if we estimate the fire return interval at 100 years, the project area is well outside of the lightning fire interval. Additionally, the quoted section of the MND provides that information only to inform some background for the project area. The analysis of potential environmental impacts is not predicated on the historical composition of the vegetation communities in the project area. The environmental analysis revolves around current conditions present at the project site. Whether or not grassland was maintained by the natural fire return interval, ranching, or other factors is irrelevant with regards to the potential environmental impacts, mitigations, and their significance. Nor is the proposed project required to exactly mimic the natural fire return interval.

Comment #3-4 (CI): The MND claim that, "By returning fire to the landscape, this project may also positivelyimpact organisms that are adapted to fire," is not supported by evidence provided withinthe MND.

The lack of clarity of the MND regarding the role of fire in the treatment areas is illustrated by Mitigation Measure #5. Although the measure correctly states that obligate seeding manzanita species possibly present in the treatment areas are threatened by short fire return intervals, it fails to provide adequate guidance to prevent such a threat. The measure uses an uncited <10-year interval as the temporal threat level. We are unfamiliarwith the research that supports this metric. CAL FIRE's own Vegetation Treatment Program EIR cites Sawyer et al. 2009 as the guide when determining fire return periods. For manzanita shrubland alliances found in the treatment area, Sawyer et al. 2009 proposes a minimum of 30 years as the lower limit of the community's natural fire return interval.

The MND needs to reconcile such inconsistencies.

Response to Comment #3-4: Mitigation Measure #5 stipulates 10 years as the absolute minimum interval that may be acceptable, and this has been clarified in the MND. Mitigation Measure #5 requires fire return intervals which support special-status shrub species. The purpose of this mitigation measure is not to exactly replicate estimated fire return intervals, but to ensure the continued existence of species which are protected under CEQA through analysis by qualified botanists. This MND chooses to utilize a different mitigation approach then that presented in the state-wide programmatic VTP EIR. There is no requirement that these two separate documents, covering vastly different scales and habitat types, include the same mitigation approach.

Comment #3-5 (CI): Of significant concern is the amount of disturbance that will occur in the construction of containment lines in treatment area 7. This may be where manzanita species (e.g., *Arctostaphylos regismontana*), as well as Ceanothus species (e.g., *Ceanothus thyrsiflorus*), are most likely present. The use of crushers and bulldozers will likely cause significant ecological damage, including making the disturbed areas susceptible to invasion by highly flammable non-native weeds and grasses.

Prescribed burns in California often lead to the spread of invasive species, or the replacement of one invasive species with another (Merriam et al. 2007, Keeley 2004). There is currently no mitigation that adequately addresses the spread of invasives due to treatments as proposed in the MND. While Mitigation Measure #17 attempts to addressthe introduction of weed propagules in the project area by project personnel and equipment, it does little to mitigate subsequent invasions as described in the above citedliterature. This inadequacy needs to be corrected.

Response to Comment #3-5: In additional to clearing of equipment of weed propagules, SFPUC has committed to post-burn vegetation monitoring and invasive control (see comment #1-2). As invasive plant control will be conducted under the existing SFPUC integrated pest management program with pre-existing CEQA compliance, it is not included in this document.

Comment #3-6 (CI): Shrublands are valuable to many species, but less useful to others. The MND needs to specifically explain how the project may negatively impact shrubland species (e.g., obligate seeding shrubs, woodrats, Wrentits, etc.) as well as benefit species that dependon more open areas.

Considering the potential for the presence of sensitive species, a more completebiological survey should be conducted than what is currently within the MND.

Response to Comment #3-6: The MND address all Endangered, Rare, or Threatened Species as defined in Section 15380 of the CEQA guidelines. This includes San Francisco dusky footed woodrats, which are protected through Mitigation Measure #12. Non-special status obligate seeding shrubs, as well as Wrentits or other commonly occurring plants and animals do not meet the definition in Section 15380 and therefore are not analyzed in this document. Furthermore, the MND contains requirements for full floristic surveys to be conducted prior to project implementation to identify rare plant species for avoidance (Mitigation Measure #1). Pre-activity surveys for the threated and endangered species mission blue butterfly, San Francisco garter snake, and California red legged frog are included in Mitigation Measures #6, #7, and #9.

Comment #3-7 (CI): The MND does not properly explain how the proposed prescribe fire treatments, "can help preserve water quality by reducing the intensity and spread of a wildfire on the watershed."

Since the project will be removing shrub cover from the treatment areas, the MND needs to explain how this will improve both water quality and watershed protection.

Response to Comment #3-7: Please refer to *Hydrology and Water Quality (a)* for supporting references on how prescribed fire has significantly less of an impact on run-off, erosion, and sedimentation then unplanned wildfire owing to its reduced intensity.

Comment #4 (FKM): We are property owners and residents of 2535 Somerset Drive, Belmont, just 300 yards from the proposed burn project site 6. We learned of the subject MND by word of mouth.
We believe the public notification of this MND was inadequate and does not meet the standards of good faith effort implicit in CEQA regulations. Residents, property owners and members of the public have been denied the right to comment on the MND because they were not notified of the project.

Failure to Directly Notify Properties Directly Abutting Project Site:

The agency cannot assume that impacted residents visit the entrances to the project site on a regular basis to observe the public notices. Direct notification via US Mail is appropriate, justified, and does not constitute undue burden on the agency.

The MND fails to adequately report the large number of sensitive receptors directly next to and within a short distance of burn sites 4 and 6. At least 50 homes share a property line with sites 4 and 6 and are within feet of the burn site. Approximately 500 homes are within 500 yards of these burn sites. An elementary school of 400 children directly abuts site 4, having classrooms as close as 50 feet from the site. (see attached images) These residents, especially children and senior citizens, are sensitive receptors. They will be exposed to significant direct impacts during the burn due to smoke, and also risk health impacts from lingering odors and smoke damage entering windows and vents. Home owners also risk financial loss resulting from the degradation of the scenic vistas, which are a significant factor in real estate values in the region.

We request owners and residents of properties abutting the watershed project site be directly notified via US Mail, and that the comment period be extended to 30 days after such mailing.

Inadequate Public Display of MND Notification:

Oddly, the public notice of the MND was placed on the inside of a fence surrounding SFPUC property – on the inside of the property to which this report claims *there is no public use*. Intentionally obscuring the notice by placing it in a *location to which the public does not have direct access* violates the spirit of, if not the specific requirement of, public notification.

We request the MND notice be posted on the exterior of the project site for an additional 30 day comment period from date of posting.

Response to Comment #4: I appreciate your interest in this project and your participation in the public comment period. I received your letter with the same communication and will be responding here.

We have extended the public comment period 15 days beyond the required 30 days. I am happy to see the notification system is working, as I have received your comments by mail and email.

I understand you are concerned about smoke impacts to surrounding community. We will work with the Bay Area Air Quality Management District (BAAQMD) to be under the acceptable limit for emissions daily. We must receive their approval on a Smoke Management Plan prior to ignition. BAAQMD must give approval the day before and the day of ignition, with input from their meteorologists and meteorologists from the NOAA as well. It will not be acceptable to burn when smoke is blowing towards the neighborhood.

In the MND CAL FIRE states that burning will be limited to 200 acres annually, but the actual limit will be much smaller. I anticipate that the units will be 30-50 acres on average each day. There are few alternatives on that piece of property, as the area is very expansive. These large and steep burn units contain areas that are inaccessible to heavy equipment. The cost of reducing the fuels manually would be unfeasible. Studies have shown that burning is the fastest way to reduce fuels, while positively impacting the plants and animals that live there. California wildfires produce so much carbon dioxide that in any given year they can wipe out the emissions cuts that the State Air Resources Board is trying to achieve. From 2013-2015 California's estimated emissions from fires on federal land alone were greater than the cuts achieved across the state's economy (Baker 2017[1]). Please understand these units were chosen because they were adjacent to homes. There have been several fires directly downhill, starting from fires along HW 280. Fuel reduction is one way to give our firefighters a much-needed advantage with so many assets at risk directly uphill of a significant ignition source.

The visual impact from a prescribed burn will be temporary and is not likely to reoccur until the distant future. Most likely these burns will be a one time event and burning the same area will require additional permitting.

Comment #5 (DB): I live in Belmont Heights and by accident, I learned of the proposal to burn nearly the entire SFPUC Watershed area adjacent to our neighborhood. Public notice has not been adequately given to this neighborhood which will be greatly affected by this proposal.

I request that the public comment period be extended, at minimum, an additional 30 days. There is no way I can prepare meaningful public comments in this short time period for such a precedent-setting proposal.

I request a response to this email so that I know if the public comment will be extended to April 20.

Response to Comment #5: *NOTE: After this response was sent to the commenter, the decision was made to extend the public comment period by 15 days. The original response is included below.*

[1] Baker, David R. 2017. Huge wildfires can wipe out California's greenhouse gas gains. San Francisco Chronicle.

Thank you for reaching out. We appreciate your interest in the proposed project. Currently there are no plans to extend the public comment period past the standard 30 day window, which ends on March 20, 2021. If the comment period is extended, public notification of the extension will be made.

Comment #6 (KK): I have recently received information regarding the planned Prescribed Burn for the Crystal Springs Open Space. I would like to voice my strong concerns about this plan. First, this seems to go against all efforts to clean up our air. Central Valley farmers are being advised that their open field burning will be curtailed in the future, yet this practice is to be used in an urban environment, close to homes? Second, this is a WILDLIFE REFUGE area. With no place to escape, how is the wildlife here going to survive? I have witnessed wildlife trying to escape wildfires in Idaho by fleeing across busy highways. While I agree that prior planning is necessary to avoid catastrophically disastrous wildfires, I believe that this plan should be revisited, and a more wildlife-friendly and environmentally sound policy should be adopted.

Response to Comment #6: Thank you for your response to the solicitation for comments on the proposed prescribed burn on SFPUC. I appreciate you taking the time to be involved in the process. The document can be found at https://ceqanet.opr.ca.gov/2021020321

Clean air is important to us all in the Bay Area. I understand your aversion to smoke, however CAL FIRE has many mitigations in place to reduce the impacts of heavy smoke on residents. If you refer to the Air Quality sections of the document, you will see that we must obtain a Smoke Management Plan and are required to work with the Bay Area Air Quality Management District, (BAAQMD) to be under the acceptable limit for emissions. They must give approval the day before and the day of for ignition, with input from their meteorologists and meteorologists from the NOAA as well. Burning will be limited to 200 acres annually, but the actual limit will be much smaller. I anticipate that the Units will be 30-50 acres on average each day. There are few alternatives on that piece of property, the area is very expansive. Treating this acreage without prescribed fire would not be possible. These large and steep burn units are inaccessible to heavy equipment. The cost of reducing the fuels manually would be unfeasible. Burning is the fastest way to reduce fuels, while positively impacting the plants and animals that live there. California wildfires produce so much carbon dioxide that in any given year they can wipe out the emissions cuts that the State Air Resources Board is trying to achieve. From 2013-2015 California's estimated emissions from fires on federal land alone were greater than the cuts achieved across the state's economy (Baker 2017).

I am aware that the area is a wildlife refuge. Prescribed burning has benefits to plants and wildlife. Please refer to the extensive mitigations (Biological Resources; Mitigations 1-9)) that were placed in the document to protect plants and wildlife from impacts. Many plants and the animals that depend on them, require intermittent disturbance to thrive. These plants and animals have evolved for centuries with fire; and in fact are adapted to exist with it. Ten special-status wildlife species are known to occur or could potentially occur in the project area. The project would not result in the permanent conversion or degradation of habitat for Mission blue butterfly, San Francisco garter snake, or California red-legged frog because prescribed burning is an important management tool for maintaining floral diversity for butterflies (McKnight et al. 2018[2]) and removing thatch and woody vegetation from upland habitat for garter snakes and frogs. Increased thatch buildup and shrub cover degrade upland habitat by discouraging use by rodents that create burrows and prohibiting movement through uplands (Ford et al. 2013[3], USFWS 2005[4]). In other words, the project would be beneficial for the habitat of all three species because it would

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[2] McKnight, S., C. Fallon, E. Pelton, R. Hatfield, A. Code, J. Hopwood, S. Jepsen, and S. H. Black. 2018. Best Management Practices for Pollinators on Western Rangelands. Xerces Society for Invertebrate Conservation, Portland, OR. Accessed April 10, 2010. https://xerces.org/publications/guidelines/best- management-practices-for-pollinators-on-western-rangelands.

[3] Ford, L. D., P. A. Van Hoorn, D. R. Rao, N. J. Scott, P. C. Trenham, and J. W. Bartolome. 2013. Managing Rangelands to Benefit California Red-legged Frogs & California Tiger Salamanders. Alameda County Resource Conservation District, Livermore, CA.

[4] [USFWS] (U. S. Fish and Wildlife Service). 2005. Intra-Service Biological and Conference Opinion on the Partners for Fish and Wildlife San Francisco Garter Snake Habitat Enhancement Project at Cloverdale Coastal Ranch in San Mateo County, California. Memorandum to California/Nevada Operations Office, Sacramento, California (Attn: Dan Strait). October 3.

improve habitat over the long-term.

The burn area will be surveyed by biologist prior to the burn multiple times. Often wildlife leaves the area prior to the burn due the increased human activity in the area. A slow moving wildfire, gives animals a chance to run away or take refuge in their burrow. Studies have shown that SF garter snakes survive wildfire by hiding in their burrow, which is underground at sufficient depth to insulate them from impacts from heat.

I feel that this plan is very environmentally sound. It has been worked on by several biologists from CAL FIRE, SFPUC and we have also hired a private contractor (Dudek) to help analyze the project to avoid impacting and actually improve the watershed for the plants and animals that live there.

Comment #7 (PS): I want to provide my views regarding the planned burn in units 4 & 6 in Belmont. Although I feel it is important for vegetation management and prevent major future fires, I don't see or understand the need in the majority of units 4 & 6. I hike there 7 days a week and most of the vegetation is low growing grasses and if there is a burn, I'm worried that only grass or weeds will regrow there. This is not a forest area.
In addition, there are many animals living in these hills. Many deer, rabbits, some coyote and bobcats as well as snakes live in the area. These fires will destroy their habitat.
I am also concerned about the smoke from the fires as the area is very close to our neighborhood.
Do you plan this burn of units 4 & 6 all at the same time? When are the burns planned?
Thank you for your consideration.
Pamela Stahl

Response to Comment #7: I understand your concerns regarding burning in Units 4 & 6. You are correct, it is not and never was, a forested area. The proposed prescribed burn aims to reduce the amount of encroaching brush and retain the small amount of Coastal Prairie that is present. This project will increase the amount of special status plants that are disappearing due to increasing competition. Many native flowering annuals require full sun and thrive on bare mineral soil. Weeds are always an issue here and SFPUC biologist and staff have committed to frequent surveys and monitoring to allow native vegetation the opportunity to thrive in an environment they are best adapted to.

This burn will enhance, rather than destroy wildlife habitat. Fire is an important part of the natural ecosystem in California. Native wildlife was evolved with fire. Burning the vegetation will increase browse for deer and increase the grassland habitat that snakes require to survive. We have consulted with the CA Department of Fish and Wildlife and the Federal Fish and Wildlife Service on this project, and they agree that the effects of this project will enhance the habitat. Please see mitigations 1-9 the document for further detail.

We do not plan to burn these Units at the same time and will divide them into smaller subunits, most likely 30-50 acres daily, with an annual maximum being 200 acres.

I understand you are concerned about smoke impacts to surrounding community. We will work with the Bay Area Air Quality Management District (BAAQMD) to be under the acceptable limit for emissions daily. We must receive their approval on a Smoke Management Plan prior to ignition. BAAQMD must give approval the day before and the day of ignition, with input from their meteorologists and meteorologists from the NOAA as well. It will not be acceptable to burn when smoke is blowing towards the neighborhood.

Comment #8 (GD): We have one ask, please do an Environmental Impact Statement. These lands as the MND says "are some of the last remaining wildlands in San Mateo County". Elsewhere it's called a "biodiversity hotspot." Yet there is no indication how the controlled burn will support maintaining the wildlands status of these lands. If anything the "pretreated by herbicide

application and/or by cutting with chainsaws" and "Dozer lines are created by utilizing a bulldozer to remove all vegetation along the line, only allowing bare mineral soil to remain" degrades the wildlands to desertified anthropocene landscapes. Increased human presence in once upon a time wildlands is a cause of wildfires.
The MND discusses endangered species such as the red legged frog and garter snake but doesn't say how their resident population will be aided by the controlled burns. Larger species like the grey fox aren't mentioned. The MND does not discuss the decline of these species and how the continued decline will be aided by the controlled burn. Instead the MND offers a hypothetical "By returning fire to the landscape, this project may also positively impact organisms that are adapted to fire" which has not worked for islanded species and there is no evidence supplied here to gage the value of this statement. Decreasing biodiversity in landscapes is a cause of wildfires.
"Burn Units were chosen adjacent to roads, trails and existing disk lines to limit the amount of control line that must be constructed." Human infrastructure such as roads and power lines are a leading cause of fires. The MND doesn't say how the controlled burns will help or increase risk in the area. What the statement implies is that the worsening fire situation in California is resulting in a business as usual response from CDF. An Environmental Impact Report would be more useful for both impacted communities and the legislature for dealing with the worsening fire situation in California.

With the economy opening up the number of bad air days are increasing. Adding fire cannot help.

Goats are proven technique for reducing fire on landscapes, so much so that goat thefts are up statewide. They also reseed and declump the area when they poop. This is an alternative that isn't analyzed.

How are food stocks for endangered species, islanded by suburbia, impacted by the control burn on what the MND refers to as serpentine soils? Vehicle emissions from HWY 280 deposit nitrogen which invasive grasses like and grow taller than the native species reducing their range and leading to extirpation. CDF can do more to control wildfires by restricting 280 to only electric vehicles! The checker spotted and mission blue butterfly in the controlled burn target area are a case in point. Instead the landscape is tending toward desertification a problem of humans have worsened on the landscape over the last 300 years. The MND says "Repeated short fire return intervals (<10 years) deplete the seedbank of these species without allowing them to grow to maturity where they can reproduce and replenish the seedbank. Over time, repeated short fire return intervals may result in extirpation of these obligate seeder shrub species if they occur in the project area." There is no indication how extirpation will be avoided for both the plants identified and the species that feed on them. Decreasing biodiversity in landscapes is a cause of wildfires.

The MND says no impact to water quality. But doesn't that depend on the increasingly unpredictable weather swings of the changing precipitation pattern?

The MND says limited recreational impact. However the burned zones will open up more areas for runners increasing trail impacts on species revival.

After considering the questions raised by the MND the prospect of wildfires does not appear to be diminished. An EIR would help answer these questions. Please do one.

Response to Comment #8: *NOTE: Please see the updated project description in the recirculated MND for burn frequency restrictions. A unit may be burned more than once, but species may return following the burn that could prevent re-burning (specifically host plants of the Mission Blue Butterfly). Also, for clarification, both CDFW and USFWS concurred with the MND's environmental analysis that the project would not result in significant impacts to special status plant or wildlife species or result in take of species listed under the state or federal Endangered Species Acts. Both these agencies support prescribed burning for habitat improvements for the species discussed below. However, CDFW and USFWS did not make a statement regarding whether this specific project would be beneficial for these species.*

I am surprised that the Sierra Club would oppose a prescribed burn project that the California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS) state will improve wildlife habitat. It is generally accepted that low intensity fire is a natural and necessary part of the California landscape.

This area is not pristine wildlands. All of the burn units are within 100 feet of a major highway (HW 280 or HW 35) and directly in the WUI. The second goal of the project is the following: Return fire to the landscape, with the goals of maintaining existing native grasslands by slowing shrub encroachment and potentially restoring some areas of shrub encroachment to open native grassland.

Ten special-status wildlife species are known to occur or could potentially occur in the project area. The project would not result in the permanent conversion or degradation of habitat for Mission blue butterfly, San Francisco garter snake, or California red-legged frog because prescribed burning is an important management tool for maintaining floral diversity for butterflies (McKnight et al. 2018[2]) and removing thatch and woody vegetation from upland habitat for garter snakes and frogs. Increased thatch buildup and shrub cover degrade upland habitat by discouraging use by rodents that create burrows and prohibiting movement through uplands (Ford et al. 2013[3], USFWS 2005[4]). In other words, the project would be beneficial for the habitat of all three species because it would improve habitat over the long-term. Both the CDFW and the USFWS agree with this statement.

Goats are not an appropriate method for reducing fuels in this area because they do not consume the woody part of the shrubs, they simply eat the foliage. This will re-sprout. Additionally, goats will trample and eat the blue lupine (present in Units 4, 5 &6) which is the sole host plant for the endangered Mission blue butterfly.

CAL FIRE has no control over the vehicles that travel Highway 280. We have, however, responded to vehicle fires from both electric and gas powered vehicles on HW 280.

It is scientifically proven that prescribed burning increases biodiversity https://nature.berkeley.edu/news/2016/03/how-fire-diversity-promotes-biodiversity. Many plants require bare mineral soil to regenerate and full sun, which is only present after a disturbance. It is assumed that after burning these areas there will be an increase in threatened and endangered plants, CAL FIRE only plans to burn these areas once. This project will increase and improve the remnant of Coastal Prairie that is left.

Any prescribed fire will not occur on days when a race or cross country event is planned. Most runners to not leave the trails.

CAL FIRE will not prepare an Environmental Impact Report because this project does not require one. An EIR is prepared when there are significant impacts that cannot be mitigated for and when experts do not agree over the significance of the effect on the environment. All agencies consulted agreed with the project as proposed (CDFW, USFWS, biologists from the SFPUC and a contractor, Dudek, that was hired). The burn area is very small (775 acres) compared to the overall size of the watershed (24,000 acres). This does not meet the threshold to complete an EIR.

Comment #9 (HW): The other area listed I'm not really familiar with but the Crystal Springs XC course I am.
I do not believe this "controlled" burn should take place. I have been running on this course for over 50 years and there has never been (or needed) a controlled burn. The only fire that I can recall happened in the early to mid-80's when a disabled vehicle from 280 caught the weeds on fire and the XC course acted as a natural fire break to protect the homes. If fear of fire and protection of homes is the intent of this burn, why not just bulldoze a fire break say 50 meters up from 280 and just do a burn from 280 up to this firebreak? Why put homes in danger?

Now let's go to the XC course... bulldozers? The damage that you can do to the XC course can be major with large scale machinery such as that. A burn in the area will cause the area to have possible erosion issues and I also heard that you wanted to just do a little bit each year, for 8 years! That's ridiculous to put the homeowners thru that kind of stress every year for 8 years. A controlled burn is only "controlled" until it's not - think Oakland Hills Fire - no thanks.

Response to Comment #9: *NOTE: Please see the updated project description in the recirculated MND for burn frequency restrictions. A unit may be burned more than once, but species may return following the burn that could prevent re-burning (specifically host plants of the Mission Blue Butterfly).*

I appreciate your comments on the prescribed burn proposed on the SFPUC property. Allow me to answer some of your questions.

There have been many vehicle fires in that area in recent history, most significantly the Crystal Fire in 2015. Fire is actually the most environmentally sensitive fuel reduction action we can take. SFPUC has asked us to limit bulldozer activity and burn between existing roads and disk lines as much as possible. We will use handline as control line as much as possible. CAL FIRE will not put homes in danger, we will burn away from homes and use a less intense backing or flanking fire. The fire will be monitored at all times by trained firefighters. CAL FIRE will most likely only burn each Unit once due to the predicted influx of special status plants.

I understand your love of that area and the joy you take from running there. CAL FIRE has burned in busy recreation areas before and we will do our best to avoid a conflict. We will not bulldoze the course. We will limit activities to days when there is not a race and try to give users as much notice as possible.

Please note that a prescribed burn is different than an uncontrolled wildfire. This is the best and most environmentally sensitive alternative for wildfire fuel reduction in this area.

Comment #10 (JKL): We live within 500 yards of your Burn site Area #6 (Prescribed Burn Cal Fire SFPUC Vegetation Management Program) and live right across the street from the Crystal Springs Cross Country Course - SFPUC Watershed. I am very concerned with your proposal for a prescribed Burn adjacent to our residential cluster of 756 households in the Belmont Heights neighborhood (behind Site 4 and 6). Due to the nature and beauty of this watershed, we believe there has **not** been careful thought and analysis done on this unprecedented action. Until recently, only a small poster tacked on a trailhead in the SFPUC was noticed by runners in the watershed with no outreach to residents.

I believe the potential negative consequences of such an unprecedented burn in our backyard to nearby residents, wildlife and vegetation in the SFPUC warrant an Environmental Impact Review (EIR) before proceeding. The following issues deserve further (EIR) review by Cal-Fire and the SFPUC, specifically:

1. Clearing, burning and eliminating the chaparral, scrub and shrubs and converting to complete grassland in Area 4 and 6 potentially creates higher flammability than current vegetation according to environmentalists. In addition, studies have shown that windblown embers are what ignites homes and the embers can be trapped and better contained with shrubs and vegetation. By eliminating the existing vegetation, Cal Fire would be actually increasing the risk of wildfires.

2. Belmont's Fire Marshall has stated that Belmont Heights neighborhood (behind Site 4 and 6) incorrectly labeled by Cal Fire as very high fire risk is in fact not very high risk due to the fact that we have relatively high moisture content compared to the rest of the City. In addition, unlike other parts of California, the winds work to our favor. During the peak fire season in August - November, the dry desert easterly winds from central California will blow any potential fire in the project area away from our homes toward Interstate 280. In the months of March - June, the moist westerly winds from the ocean bring in high moisture coastal air mass to both the project area and our neighborhood reducing chances of fire amidst the fresh spring vegetation.

3. Your prescribed Burn and vegetation mitigation on the West side of our homes will not protect us if the wildfire were to come from the densely vegetated open space canyon to the East of our neighborhood.

4. Residents are very concerned with the potential air quality, water quality, ash runoff and herbicide consequences from this prescribed Burn. Loss of vegetation will also mean soil erosion from high winds and rain.

5. Cal Fire and SFPUC appear to be totally unaware of the heavy recreational use of the Cross Country Course used by many youth league teams and the X country events attended by thousands of participants every August-November, not to mention all the youth that practice daily on the running track.

6. The watershed is home to many wildlife; deer, heron, rabbits, and even mountain lions. What is your plan for a wildlife relocation program before the Burn?

7. SFPUC wildfire prevention practices in the past has been very adequate for decades with annual mowing and disking the entire residential boundary of Sites to a minimum break of 30-50 feet. Why aren't alternative programs being investigated to alleviate this problem such as using goats or better preparing homes for fire resistance?

Before Cal-Fire and SFPUC proceed with this unprecedented Burn in the name of preventing wildfires, a thorough environmental analysis of the above concerns should be done and other safer alternatives should be investigated.

I will be attending your Cal-Fire Zoom meeting this Wednesday evening and would like the following questions answered during your Question and Answer session:

A) Why do you want to convert brush to grass when it's been proven that grass is more flammable and does less to block blowing embers than brush?

B) Since your report didn't mention anything about the 756 households, Fox elementary school or the X country running course used by thousands of youth, are you aware of the potential dangers of your prescribed Burn to thousands in our community; not to mention all the dangers to wildlife residing in the watershed? Do you plan to do an EIR?

C) Have you seriously considered alternatives as well as additional measures such as helping homeowners replace vents and other home hardening methods that better reduce fire risk to complement the annual SFPUC mowing and disking that has been done for the past decades?

Response to Comment #10: *Note: Answers to the questions requested to be addressed in the Zoom meeting can be found in this document. Please see Response to Comment #10, #23-23, #23-26, #23-43, and #31-1.*

Thank you for your response to our proposed project.

CAL FIRE has done a large amount of analysis for this project, biological analysis has taken over three years. This analysis was completed by biologists from the SFPUC, CAL FIRE, and an independent contractor, Dudek. We have also consulted many outside agencies and groups, such as the California Department of Fish and Wildlife and the Federal Fish and Wildlife Service. Those agencies agree that this project will have no negative impact on the environmental setting.

1. CAL FIRE and SFPUC do not aim to convert the area to grassland. By running a natural and low intensity disturbance through a small part of the watershed we will not convert the area to complete grassland. Prescribed fire will set back the successional clock but not convert the area to another vegetation type permanently. It is true that brush traps embers, but then those embers go on to start additional fires in that subsequent vegetation. In my years as a firefighter, I can tell you it is easier to stop a grass fire then a brush fire. Firefighters can often take a frontal assault on a grass fire, which is not always possible in denser fuels.

2. I do not agree with the statement that your neighborhood is not in danger because of the high fuel moistures. I encourage you to check the National Fuel Moisture Database http://www.wfas.net/nfmd/public/index.php where we log our results from the Pulgas Site, very close to your home. You will find those fuel moistures get very low, lower even then coastal areas, which see significant fire activity. The wind may not blow a head fire towards your home during the Diablo wind events, but other wind patterns can cause fires started on HW280 to blow uphill. Diurnal winds cause wind to blow up canyon at the end of the day, caused by movement of heated air. It used to be common to say that San Mateo County doesn't burn, particularly the coast. After the fire activity I have seen in recent years, I can say with certainty that is not the case.

3. We were unable to have a burn unit in that area because of the presence of blue lupine, which is home to the endangered Mission Blue Butterfly. We may have to disturb that area in the event of a wildfire. The less fuel reduction we have to conduct

in the face of an advancing wildfire, the better chance suppression resources have at catching a wildfire. Every bit helps.

4. While CAL FIRE is burning the plants, the roots will remain intact and the area will revegetate quickly (please see the coastal area of the CZU Complex, it has re sprouted). We have also analyzed the effects of air quality, water quality and herbicide. Please refer the MND for in depth analysis.

5. We do mention in the MND that there is recreational use. CAL FIRE burns will not conflict with any races or events. We have successfully held prescribed burns in popular recreation spots (UCSC Natural reserve) by giving proper notice and limiting burns to weekdays. We will do the same here.

6. Please refer to the biological resources section of the MND for our standards for dealing with wildlife. Larger animals have sufficient mobility to leave an area, which will have significant human activity for weeks as we prepare the Unit to burn. Biological monitors will conduct multiple surveys prior to ignition and will be on site during the burn to help mitigate harm to wildlife.

7. Goats are not appropriate for this area because they do not eat woody vegetation. Also there are many endangered plants that they would destroy, which fire will actually help. Mowing the entire area is not feasible nor environmentally sensitive. Home hardening is the responsibility of the homeowner.

I would also like to mention that the schools and sensitive receptors are mentioned in the MND in the Air Quality Section:

Air Quality

Less than Significant Impact: The project area is located adjacent to a dense urban area with sensitive receptors including schools, hospitals, senior housing, and State Highways among others. Burning will be restricted to designated burn days within prescription, and BAAQMD will be consulted the morning of each burn day to ensure that conditions are conducive to smoke dispersal. If conditions change during the course of the burn and smoke begins to impact communities with sensitive receptors, the burn will be terminated. CAL FIRE will monitor conditions and cease lighting if conditions become unfavorable and HWY 280 becomes affected by smoke. Public notifications will be conducted prior to anticipated burn days, per the Smoke Management Plan with BAAQMD.

Comment #11 (BS): First off, thank you for the information and your responses.
I listened to the ZOOM meeting on Wednesday night and wanted to make a few comments.
I do believe the burn is important and necessary and I support it.
I do request that the burn be limited to 60 acres per burn and a maximum 200 acres per year as was communicated in the ZOOM meeting.
I do request that this be put in the burn plan by either amending the MND or in the final document.

Response to Comment #11: Thank you for your comment.

Comment #12 (JNC): Thanks to you and Rich for providing information yesterday evening on the SFPUC Vegetation Management Program. We appreciate all the work you and CAL Fire are doing to try to protect our homes from wildfires.

We live on Bear Glen Drive in Woodside a few miles south of Unit 7, just off of Highway 35 (south of Kings Mountain Road, near the relatively El Corte de Madera Creek Preserve parking area). We had a few follow-up questions not directly related to the VMP.

1) In contrast to many of those who commented yesterday, we would potentially be VERY interested in having some controlled burns remove the fuel in the large area just north of our home. Has any thought been given to doing a controlled burn in our area? We realize that it is hilly and that this may make a controlled burn challenging--but it is also a reason to do a controlled burn.

2) Could you please send the slide deck you shared yesterday? We didn't see it in the materials on the website, though we may have missed it.

3) Would you consider assessing our property for fire risk if you are ever in this area? Don Bullard stops by annually and has done a terrific job providing recommendations over the years, all of which we have followed. But additional expert suggestions couldn't hurt, and it appears that you are very familiar with the vegetation in this area from the Kings Mountain Road project. We want to take every measure possible to increase the safety of our home.

Response to Comment #12: Thank you for your support of our project. I cannot email my presentation because the photos make it too large but I would be happy to send any information or photos you would like.

The area north of your property, is that California Water property? We have contacted them very recently to conduct some fuel reduction on their property, not necessarily prescribed burning. They were very receptive, although we are still at the very start of this process, which will take a long time. The Mid Pen property is a different story, they are working on an EIR for fuel reduction. I am not sure of their plans for that area, but here is the contact for Coty Sifuentes-Winter (csifuentes@openspace.org) who is in charge of that process.

I would be happy to swing by your property, although it is technically Woodside Fire Protection District. We have done some work on Bear Gulch Rd.

Comment #13 (KK): This is a duplicate of Comment #6.

Response to Comment #13: Please see Response to Comment #6.

Comment #14 (CB): I would like all information regarding the meeting on March 24 re zoom and how we get on record opposing the upcoming burn. See Below:

You are the only residents of the Knolls that I know so I'm sharing this with you because I believe residents there have NOT been notified of the intention of CAL FIRE to burn the open space behind you.
The project was announced in February but the only notice was a small paper on the inside of the watershed gate. I'll attach both the full study and my comments here.

Attached are the comments I plan to submit to CAL FIRE about the burn. Feel free to plagiarize whatever points that you find compelling, and of course add whatever other concerns you have. FYI a number of us lobbied and got the deadline for comments extended to April 15.
CAL FIRE has now recognized that they have a PR problem, and although they still refuse to do any direct notification (would 100 stamps hurt them??) they have scheduled a ZOOM webinar for next Wednesday March 24. I will forward the email notice to you.

Briefly, the 12 issues I cite are:
1. Incomplete description/disclosure of the setting and land use (missed the CCC and all the homes and Fox School!)
2. Conversion of scrub to grassland violates CA public resources code 4483
3. Evidence disputing the need for the burn
4. Evidence disputing the effectiveness of fire to reduce hazard in this setting
5. Failure to evaluate alternatives (goats, manual/mowing, home hardening)
6. Lack of wind analysis (El Diablo's blow the opposite direction)
7. Lacking project details (conceals plan for repeated burns, doesn't specify scale or timing of each burn)
8. Potential runoff contamination of reservoir
9. Air quality – net long-term carbon increase
10. Direct smoke impacts on residents (the ones that don't exist according to the study)
11. Wildlife impacts (direct and indirect)

12. Impacts to beneficial plants, oaks

Response to Comment #14: *NOTE: This letter was not a formal comment letter, but was a letter distributed amongst residents near the project area and was eventually forwarded to CAL FIRE. The 12 issues cited in the letter are all addressed in various comments and response to comments in this document (In particular, see Comment #23*).

I was forwarded your email from our Public Information Officer. I hope that we have answered your questions in the informational presentation this week. However, if you have additional questions and would like your email to become part of the official record please email it to the Sacramento Public Comment address, which is CC'd at the top.

I wanted to mention that the setting was included in the MND. There is some misinformation stating that it was not included in the document.

Air Quality - The project area is located adjacent to a dense urban area with sensitive receptors including schools, hospitals, senior housing, and State Highways among others. Burning will be restricted to designated burn days within prescription, and BAAQMD will be consulted the morning of each burn day to ensure that conditions are conducive to smoke dispersal. If conditions change during the course of the burn and smoke begins to impact communities with sensitive receptors, the burn will be terminated. CAL FIRE will monitor conditions and cease lighting if conditions become unfavorable and HWY 280 becomes affected by smoke. Public notifications will be conducted prior to anticipated burn days, per the Smoke Management Plan with BAAQMD.

Comment #15 (FKM): I am a property owner in the Belmont Heights neighborhood near the proposed burn project site 6. Identified as: SFPUC Prescribed Burn Project, San Mateo County, CA March 19, 2021

I want to strongly voice my objection to this burn:

1) This burn would back up to the homes located on Hallmark drive in Belmont and poses a risk to homes in the neighborhood. Also, the burn would be next to Fox Elementary school which borders the burn area, another danger. So there is potential fire danger to the homes and the Elementary school.

2) The area of the burn also covers the San Mateo Cross Country course which is used daily by people walking, running and exercising. This would impact the air quality for months after the burn and could affect peoples health, not only for the people who use the cross country course for exercise and recreation, but also people living in the Belmont Heights neighborhood next to the burn area.

3) When I've been walking on the cross country course, I often see deer, rabbits, snakes, birds and other wildlife in the area. The burn would certainly kill many plants, trees, and wild animals and disrupt the native ecosystem.

The proposed burn is not needed and will be harmful and a danger to the residents of the Belmont Heights neighborhood and to the wildlife and ecosystem in that area.

Response to Comment #15: Thank you for your response to the solicitation for comments on the proposed prescribed burn on SFPUC. I appreciate you taking the time to be involved in the process. The document can be found at https://ceqanet.opr.ca.gov/2021020321

1) This prescribed burn is being conducted in order to prevent a catastrophic wildfire from damaging the community. The fire danger is the heavy traffic on interstate 280 directly downhill from homes and the elementary school, with heavy brush in between. By reducing fuel we can slow the spread of a wildfire, allowing firefighters to take action.

2) Clean air is important to us all in the Bay Area. I understand your aversion to smoke, however CAL FIRE has many mitigations in place to reduce the impacts of heavy smoke on residents. If you refer to the Air Quality sections of the

document, you will see that we must obtain a Smoke Management Plan and are required to work with the Bay Area Air Quality Management District, (BAAQMD) to be under the acceptable limit for emissions. They must give approval the day before and the day of for ignition, with input from their meteorologists and meteorologists from the NOAA as well. Burning will be limited to 200 acres annually, but the actual limit will be much smaller. I anticipate that the Units will be 30-50 acres on average each day. There are few alternatives on that piece of property, the area is very expansive. Treating this acreage without prescribed fire would not be possible. These large and steep burn units are inaccessible to heavy equipment. The cost of reducing the fuels manually would be unfeasible. Burning is the fastest way to reduce fuels, while positively impacting the plants and animals that live there. California wildfires produce so much carbon dioxide that in any given year they can wipe out the emissions cuts that the State Air Resources Board is trying to achieve. From 2013-2015 California's estimated emissions from fires on federal land alone were greater than the cuts achieved across the state's economy (Baker 2017). Air Quality will not be the same as the 2020 fire season, the impacts will most likely only last one day.

3) Prescribed burning has benefits to plants and wildlife. Please refer to the extensive mitigations (Biological Resources; Mitigations 1-9) that were placed in the document to protect plants and wildlife from impacts. Many plants and the animals that depend on them, require intermittent disturbance to thrive. These plants and animals have evolved for centuries with fire; and in fact are adapted to exist with it. Ten special-status wildlife species are known to occur or could potentially occur in the project area. The project would not result in the permanent conversion or degradation of habitat for Mission blue butterfly, San Francisco garter snake, or California red-legged frog because prescribed burning is an important management tool for maintaining floral diversity for butterflies (McKnight et al. 2018[2]) and removing thatch and woody vegetation from upland habitat for garter snakes and frogs. Increased thatch buildup and shrub cover degrade upland habitat by discouraging use by rodents that create burrows and prohibiting movement through uplands (Ford et al. 2013[3], USFWS 2005[4]). In other words, the project would be beneficial for the habitat of all three species because it would improve habitat over the long-term. The burn area will be surveyed by biologist prior to the burn multiple times. Often wildlife leaves the area prior to the burn due the increased human activity in the area. A slow moving wildfire, gives animals a chance to run away or take refuge in their burrow. Studies have shown that SF garter snakes survive wildfire by hiding in their burrow, which is underground at sufficient depth to insulate them from impacts from heat.

Comment #16 (MM): I am writing in response to the SFPUC Prescribed Burn Project.

I am unable to determine the planned timing of intended broadcast burn, and whether this plan is for a single effort or for multiple and repeat efforts over several or many years.

I am unable to determine what efforts are planned to control rattlesnakes in the area, in particular in the areas of the Crystal Springs Cross Country Course. The homes on the western side of St. James Road, Belmont border the Crystal Springs Cross Country Course and other parts of the Prescribed Burn Project. Over the years, we have experienced rattle snakes in our backyards. I am concerned that broadcast burn could drive rattlesnakes from the burn area into the adjacent housing. Can you address the efforts that will be undertaken to prevent this.

Response to Comment #16: *NOTE: Please see the updated project description in the recirculated MND for burn frequency restrictions. A unit may be burned more than once, but species may return following the burn that could prevent re-burning (specifically host plants of the Mission Blue Butterfly).*

I appreciate your comments on the prescribed burn proposed on the SFPUC property. Allow me to answer some of your questions.

CAL FIRE only plans to burn each area once, it is likely that endangered plants will regenerate within the burn area precluding further project activities. Also, the large area will most likely take the entire length of the contract. It is uncertain when we will start burning because it is weather dependent and other permits must be obtained prior to project activities.

Snakes are a large issue in those Units. First we will always burn downhill against the terrain, driving any snakes away from homes. Also the document specifies that we need a biological monitor in those Units, helping us monitor wildlife and

removing or encouraging them to leave the Unit prior to burning. Additionally we will have a great deal of activity in the burn area prior to actually burning (laying hose, biological surveys, cutting line) these human activities also signal to wildlife to leave the area.

Comment #17 (KM): Also that course is very close to houses. Won't the smoke be unhealthy?

By the way, the phone number posted there is not in service.

Response to Comment #17: The smoke from a prescribed burn is much lighter then the smoke from a wildfire. Studies have shown that it is 25-50% less smoke then a wildfire of equivalent size. CAL FIRE will only be able to burn if wind is blowing away from the homes. We also have to balance that with the fact that there have been several wildfires in that area starting on Interstate 280. This project aims to reduce the chances of a wildfire starting on Interstate 280 and burning down homes.

We have a very robust notification system that includes a press release, social media and postings on site.

Comment #18 (LO): I am not in favor in burns in San Mateo county SF watershed and destroying the vegetation and beautiful habitat. The vegetation will grow back and is normally more dangerous than the native plants you destroy. This farce gives the neighborhood a false sense of security. Instead of all these burns why doesn't the government and Cal Fire work on funding, educating and helping us harden our homes. Almost all big neighborhood destroyed in recent CA fires are by flying embers. This proposal is a waste of time and money.

Response to Comment #18: Thank you for your comments on our project. The document can be read at NOC_MND_CZU_-_SFPUC.pdf (ca.gov)

Please refer to the extensive mitigations (Biological Resources; Mitigations 1-9) that were placed in the document to protect plants and wildlife from impacts. Many plants and the animals that depend on them, require intermittent disturbance to thrive. These plants and animals have evolved for centuries with fire; and in fact are adapted to exist with it. Ten special-status wildlife species are known to occur or could potentially occur in the project area. The project would not result in the permanent conversion or degradation of habitat for Mission blue butterfly, San Francisco garter snake, or California red-legged frog because prescribed burning is an important management tool for maintaining floral diversity for butterflies (McKnight et al. 2018[2]) and removing thatch and woody vegetation from upland habitat for garter snakes and frogs. Increased thatch buildup and shrub cover degrade upland habitat by discouraging use by rodents that create burrows and prohibiting movement through uplands (Ford et al. 2013[3], USFWS 2005[4]). In other words, the project would be beneficial for the habitat of all three species because it would improve habitat over the long-term.

Hardening homes is the responsibility of the homeowner, as is all maintenance and up keep. Please see this site for additional information Hardening Your Home - Ready for Wildfire.

Comment #19 (MPS): To Whom it may Concern:
I live at 2528 Hallmark Drive in Belmont. I have been informed that there are plans being made to have a "controlled" burn of the land/open space directly across from our house. I'm adamantly against this idea. It's not a solution, it's an unnecessary action that threatens our air, our home, the natural environment and the wildlife.

The area being discussed has full access to fire equipment to douse any flames that may spontaneously erupt. There are no forests, only small patches of leafy bushes. It is a cherished public space that is very popular with hikers, runners and is used by the county for college & high school cross country races, annually. PLUS, 200 acres is the entire area from Fox School to San Carlos, equivalent to 150 football fields or 800 residential parcels, 1 mile long by 1/3 mile wide.

BESIDES all that, it's OUR front yard for over 32 years!

I see no good reason for this burn, and am extremely resentful of the secrecy and lack of transparency. I'm angry that such a

hare-brained idea has survived even one meeting. I insist the plan be thrown back in the garbage, where it belongs.
The threat to our air quality, the "scorched-earth" effects it will leave behind, (plus more flammable grass will regrow within the year) is not a solution.
There's already a fire break that is renewed every year. Believe me, this is plan is an over reaction to a danger that could be easily handled by fire hoses, if ever needed.
I insist this plan be abandoned. This plan is dangerous.

Response to Comment #19: I encourage you to read the document at https://files.ceqanet.opr.ca.gov/267723-1/attachment/IUpu8HeXXPqcks49ejbKvm4ypwwJH4qBQ-kcx_UKP9Klyt60fEst3J1KMAeKcGuZV-h_HfJRkwG_7K2O0

I understand you consider it your front yard, it is actually public land which has a significant fire history. With the current trend of large damaging fires, this is the most environmentally friendly method to reduce fuels and increase fire safety.

Comment #20 (KH): I am a property owner and resident of Belmont, just 500 yards from the proposed burn project site 6. I am also a frequent runner on the Crystal Springs Cross Country Course, located within the burn project site 6. After reading the MND, I request that Cal Fire revise the project.

The cities of Belmont and San Carlos are not mentioned in the project description, although these cities are adjacent to burn project site 4 and 6. Sites 4 and 6 account for 50% of the proposed burn acreage. These cities will be the most impacted by the broadcasted burns. Major impacts will be on the air quality, hazardous materials (herbicide use), recreation (Cross Country Course, Tennis Courts Hallmark Park) and noise from the proposed project.

The primary objectives of the burn project are described on page 6 as: 1. Create or maintain areas of reduced vegetation to protect the water supply for SFPUC customers in San Francisco and the Peninsula; 2. maintaining existing native grasslands by slowing shrub encroachment; 3. Train CAL FIRE personnel in firing and control techniques.

Page 9 of the MND describes the local environment "Substantial areas dominated by grassland occur through the project area." Also, page 57 states "The dominating fuel type is grass, with a variable coyote brush (Baccharis pilularis) component. According to Aerial Bing Maps 2020 from the Dudek Report Figure 1D Burn Unit 6 is largely grassland. Therefore, there is no need for the project at Burn Unit 6. The project objective is already met.

Page 34 of the MND describes "Burns will be conducted to ensure that smoke generated from the project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation." "The smell of smoke may be present in the area for a day or two, however it is not expected to adversely affect the population. This should be balanced with the fuel reduction benefits this project offered to homes directly adjacent to the burn unit."

We have had to deal with a lot of smoke and staying at home order in the last 1-2 years. People want to get out and enjoy the Parks and Open Spaces. Please do not use a prescribed burn which will severely impact the air quality/smoke smell and keeping windows closed for Unit 4 and Unit 6. Unit 4 and 6 have already reduced vegetation. There is no benefit only drawbacks for Unit 4 and Unit 6.

Response to Comment #20: *NOTE: Both CDFW and USFWS concurred with the MND's environmental analysis that the project would not result in significant impacts to special status plant or wildlife species or result in take of species listed under the state or federal Endangered Species Acts. Both these agencies support prescribed burning for habitat improvements for the species discussed below. However, CDFW and USFWS did not make a statement regarding whether this specific project would be beneficial for these species.*

I understand that you do not want a prescribed burn near your home.
The cities of Belmont and San Carlos are mentioned in the report. Air Quality. The location of this project – directly adjacent to high density housing, major infrastructure and the water supply for San Francisco makes the cost of inaction too high. Because of the population density and HWY 280, there can be multiple fire starts each year. The project area is located adjacent to a

dense urban area with sensitive receptors including schools, hospitals, senior housing, and State Highways among others.

Units 4 & 6 are a mix of grass and brush, with brush slowly encroaching and dominating the fuel type. This project aims to retain the limited amount of grassland left on SFPUC property. This burn will enhance, rather than destroy wildlife habitat. Fire is an important part of the natural ecosystem in California. Native wildlife was evolved with fire. Burning the vegetation will increase browse for deer and increase the grassland habitat that snakes require to survive. We have consulted with the CA Department of Fish and Wildlife and the Federal Fish and Wildlife Service on this project, and they agree that the effects of this project will enhance the habitat. Please see mitigations 1-9 the document for further detail.
I understand that you are concerned about smoke. This project aims to reduce the chances of an uncontrolled wildfire in that area (which has a significant fire history from sources on HW 280). This current fire season has already started and smoke impacts from wildfires are much more severe than impacts from prescribed burns.

This document will be rereleased with some edits. You will be contacted directly and given an additional chance to comment.

Comment #21 (PS): After attending the zoom meeting on Wednesday night I am still very concerned with the purposed burns of our watershed. I seriously hope you listen to the public's concerns and make amendments. Enclosed is just a few pictures of the wildlife that lives in this watershed. I feel you are proposing to burn an excessive and unnecessary amount and that the burns should be limited in acreage. I have great concern over where the wildlife will relocate. The fact that you are doing these burns so close to a public school and many homes is also very disconcerting.

Response to Comment #21: Thank you for your additional comments.

Thank you for the photos of wildlife. We have chosen that site because it is next to homes as an area of reduced fuel where firefighter can take a stand against a wildfire. I have seen a great deal of wildlife in burn areas. These animals will continue to use the area after it is burned.

Comment #22 (JL): Thank you for hosting the Cal-Fire webinar zoom meeting last nite explaining in more detail your MND for the prescribed Burn in Unit 4 and Unit 6 behind my home in the SFPUC watershed. Sarah Collamer, Forrester project manager introduced two new items of information relating to Unit 4 and Unit 6 that should to be included in a reissued MND project document for credibility, transparency and clarification to the public and other subsequent approval agencies.

1. She indicated that Unit 4,5, 6 would not be burned in its entirety but only 30-60 acres in contradiction "up to 200 acres annually" stated on page 57.

2. She indicated that Unit 6 will have a significant buffer between the property line and will not be burning up to the homes. The map in the report does not reflect what was said last nite at the meeting. The red line on the current map (Figure 4) is drawn right up to Hallmark Drive causing concern and confusion for nearby residents and lack of confidence in the process.

In addition, there were several serious glaring omissions in the report that reveal a lack of transparency and concern. It appears from the report that more emphasis was put on special status species and vegetation analysis than on people living in the adjacent community.

3. The report fails to even mention that the Watershed borders 756 households that live behind Unit 4 and 6; that many backyards directly face the Burn within very short distances of their backyards on Hallmark Drive and St. James Road. Indeed, on page 64-65, the report actually states there is no impact because there are no communities within the project area (true) but fails to mention adjacent homeowners within yards of Unit 4 and 6.

4. The report fails to mention that there is an elementary school of 400 students (Fox school) within 500 yards of the prescribed burn.

5. The report also fails to mention on page 12 under Land Use that this cross country course is used by thousands of youth for

practice and cross country league events. It even states that "recreational use is restricted to Filfied-Cahill Ridge Trail only" which is totally inaccurate.

It is in your best interests as the Cal-Fire agency in charge of this project that you correct and resubmit this document including the 5 issues mentioned above and make sure it adheres to all CEQA requirements. As Rich Sampson indicated last night, this is the first of several documents to be issued by Smoke Management and Burn Plan agencies and others. All of them will base their important conclusions and assessments on this document provided by your agency so it must be complete, correct and transparent in order to protect all involved residents.

Response to Comment #22: We still plan to burn 200 acres annually but we will not burn it all in one day. That number maybe spread to different units around the project area.

While we do mention the urban environment many times, you are correct we need to mention that the school more directly.

Air Quality - The location of this project – directly adjacent to high density housing, major infrastructure and the water supply for San Francisco makes the cost of inaction too high. Because of the population density and HWY 280, there can be multiple fire starts each year.

The project area is located adjacent to a dense urban area with sensitive receptors including schools, hospitals, senior housing, and State Highways among others.

The document will be edited and rereleased for another comment period after this one ends. You will be emailed directly when this happens.

Comment #23-1 (FKM): Our complete comments on the CAL FIRE IS-MND for the Proposed SFPUC Crystal Springs Prescribed Burn project are in the attached document “Comments on CAL FIRE MND – SFPUC”.The comments detail why the study of the proposed burn units is inadequate, and the conclusion is flawed. The IS-MND document has glaring omissions and is riddled with generalizations not supported by evidence.

The project is ill-conceived and will not achieve two of the three stated objectives:

Objective #1: Create or maintain areas of reduced vegetation with the goal to reduce fuel loading and woody fuel continuity where firefighting tactics can be more successful, thereby increasing the safety of neighborhoods near the SFPUC Watershed. By creating ormaintaining areas of reduced vegetation, protect the water supply for SFPUC customers inSan Francisco and the Peninsula by limiting the spread of wildfire.

Burning chaparral and grassland on the lands abutting Belmont will *not* increase the safety of neighborhoods. The units adjacent to the neighborhoods are already cleared down to dirt or mowed grass well beyond the homes. In the event of a windblown fire, the homes themselves and the heavy vegetation in their own yards will ignite from embers traveling from miles west in SFPUC forest, or from the homes and open space *east* of the neighborhood. Paradise and Coffee Park homes burned while the surrounding forest and vineyards resisted the fire. There isevidence that homes surrounded by barren land are just as likely to burn when they are not adequately hardened, and this evidence is supported and promoted by CAL FIRE itself.

Response to Comment #23-1: CAL FIRE agrees that home hardening is an important part of community wildfire resiliency, in addition to the fuel reduction methods this project proposes. Home hardening and fuel reduction are complementary strategies, and not mutually exclusive. Additionally, the purpose of the proposed project is not to create barren ground, but to reduce fuel loading and encroachment of woody species. Vegetation regrowth will begin in the next growing season after the burn.

Comment #23-2 (FKM)**:**
Objective #2: Return fire to the landscape, with the goals of maintaining existing native grasslands by slowing shrub encroachment and potentially restoring some areas of shrubencroachment to open native grassland.

First, replacing shrubs with grasslands is a bad idea – grass is more flammable, not less. Moreover, CAL FIRE has yet to produce a single documented example of a burn which increased or restored native grasses or reduced fire fuel permanently. CAL FIRE burns of MidPen's Russian Ridge increased invasive grasses. Invasive grasses have a 90% higher fuel load than natives, thereby increasing risk of damaging wildfires. Burning does not restore natives. Permanent fire fuel eradication requires restoration of native grasses with lower fuel loads, thus sustainably eliminating the need for annual abatement measures. But restoration requires a methodical program of careful timing and less invasive mowing, which this plan lacks. Insteadof reducing future maintenance, this project is likely to *increase* the need for annual abatementmeasures – a cycle of increasing waste and pollution.

Response to Comment #23-2: The proposed project includes invasive species treatments by SFPUC, as specified and clarified in the project description. Additionally, please see Comment #1-2 where SFPUC reiterates their commitment to conduct post-burn vegetation monitoring. Invasive plant treatment and vegetation monitoring is covered by existing CEQA documents that SFPUC utilizes for its integrated pest management program.

Comment #23-3 (FKM):
Objective #3: This leaves us with the last objective; training staff. Burning the most concentrated site of endangered species in the State of California for the purpose of practice is an unconscionable violation of the intent of CEQA policies. The photo on the front of the IS- MND document shows one of the finest examples of native serpentine grassland in the region and possibly the state, yet CAL FIRE intends to burn it. There are tens of thousands of acres statewide more suitable for practice burns – land that is already damaged, and is located far from urban areas. Alternative sites have not been considered as is required by CEQA. After a dismal outcome, MidPen has now denied use of their lands for practice burns, forcing CAL FIREto look elsewhere to burn. "Training" is not adequate justification for destroying the most scenic, rare and pristine native habitat in the region.

Response to Comment #23-3: Training staff is an auxiliary benefit of the proposed project and is not proposed as justification for the project itself (See updated project description in the recirculated MND). Burns under this MND will never be conducted for the sole purpose of training. For clarification, the photo on the cover of the MND is not of a burn unit, but is rather intended to represent the greater watershed. Finally, CEQA does not require a formal alternatives analysis for a mitigated negative declaration.

Comment #23-4 (FKM): We support project alternatives (2) "undertake additional environmental studies", or (3) "abandon the project".

Response to Comment #23-4: No response needed.

Comment: 23-5 (FKM): We are property owners and residents of 2535 Somerset Drive, Belmont, just 300 yards from the proposed burn project unit 6. This MND is not sufficient, and a complete environmental impact report is warranted, in which alternative mitigations are explored, including the alternative of "no project".

In this response to the published MND, we detail concerns about this controversial project. TheMND fails to substantiate the need for the project; there is substantial evidence supporting a fair argument that portions of the project are not necessary and will not reduce wildfire hazards as claimed.

The description of project setting and environment is incorrect and incomplete. These errors lead to incorrect assessment of impacts and inadequate mitigations. Mitigations are vague and lack enforceable measures. Controlled before and after monitoring is completely lacking, making it impossible for a third party to ascertain the success of the project objectives.

The project's potentially significant environmental impacts require, at a minimum, preparationof an EIR in which alternative programs are explored for each unique site, including the alternative of "no project". We discuss 13 areas of concern which are inadequately addressed,inadequately mitigated, or both.

Response to Comment #23-5: This comment summarizes the content of the comment letter. Reponses to specific comments associated with the above comment are included below.

Comment #23-6 (FKM):

1. Incomplete Description of the Existing Environmental Setting and Land Use:

   The MND omits significant site characteristics essential to the evaluation of impacts. (CEQAGuidelines, §§ 15125, subd. (a), 15063, subd. (d).). The IS/MND does not inform the decision-makers and the public of the project's setting, as CEQA mandates.

Response to Comment #23-6: This comment does include specific instances of the above claim and does not require a response. Please see following comments for response to specific examples.

Comment #23-7 (FKM):

a. Project location: Page 6 lists surrounding communities yet, oddly, omits the City of Belmont, which shares 1.5 mile of property line, is directly impacted by 50% of the total project area, and is also the most densely developed area of all project units.

Response to Comment #23-7: A more thorough listing of the communities near the project area has been included under Project Location.

Comment #23-8 (FKM):

a. Sensitive receptors: The report conspicuously omits that approximately 50 homes sharea property line with unit 6, and approximately 500 homes are within 500 yards of the site. Fox elementary school (400 students) adjoins unit 4, yet the report misleadingly states on page 59: "No schools exist or are proposed within one-quarter mile of the project area." A potential 1500 or more persons may be impacted, with a significant percentage being children or the elderly. This glaring omission and false statement conceals important information from decision makers and the public.

Response to Comment #23-8: Page 59 has been updated to include Fox Elementary School, which is approximately 300 feet from the proposed project. The MND already acknowledges that the project is adjacent to communities, as this is the one of the primary purposes for the location of the project.

Comment #23-9 (FKM): Additionally, CAL FIRE has denied requests to directly notify properties abutting the project sites, even though such notification poses no burden to the agency and wouldnot delay the project. Inadequate public notification denies the public the right to comment on the MND and constitutes a lack of good-faith efforts to conform with theintent of CEQA.

Response to Comment #23-9: CEQA does not require direct mailers to be sent to nearby residents unless previously requested by individuals (CEQA Guidelines Section 15072 (b)). CAL FIRE has instead utilized on and off-site public notification postings, as well as circulation of the Notice of Intent in a local newspaper. CAL FIRE has already exceeded its public notification requirements under CEQA by choosing both options (1) and (2). Whether or not direct mailers constitute an undue burden on the lead agency is not relevant under CEQA Guidelines Section 15072 (b).

Comment #23-10 (FKM):

b. Recreational use of unit 6: The MND project site description omits the existence of the3-mile College of San Mateo Cross Country Course ("CCC track") clearly visible in the image on page 4. The report even denies the existence of the track:

p.9: Recreational activities are restricted to the Crystal Springs Regional Trail operatedby San Mateo County Parks and the Fifield-Cahill Ridge Trail which operates on a guided basis on Wednesdays, Saturdays and Sundays.

p.12: The Peninsula Watershed is a state-designated Fish and Game Refuge.
Recreational use is restricted to the Fifield-Cahill Ridge Trail, a 10-mile volunteerled trail managed by SFPUC, and the 17.5-mile Crystal Springs Regional Trail managed by the San Mateo County Parks Department.

The CCC track is used by an estimated 30,000 visitors yearly. In addition to public usefor recreation on a daily basis, year-round (350/week = 17,000), the track is the site ofyouth league cross country events from August into November. Events and training occur almost daily, and scheduled events are attended by an estimated 17,000 participants and spectators over the course of the 3-month season. Two utility structures, electric power, and other track amenities are not mentioned in the MND.

Response to Comment #23-10: A description of the cross county course has been added to the aforementioned sections and is addressed in the *Recreation* section. The proposed project will only require the cross country course to be closed for a few days at a time at most, and will not permanently alter the publics ability to utilize the course.

Comment #23-11 (FKM):

c. Incorrect description of site characteristics: The MND mitigations generalize the analysisof seven vastly different environmental settings into one categorical bucket. In fact, the units are radically different: unit 7 is cypress-eucalyptus forest with few structures, while unit 6 is grassland adjacent to hundreds of homes. Throughout the document, blanket generalizations are made to dismiss alternatives, dismiss impacts, and deny the need for mitigation. For example, this statement about Air Quality:

p. 34: Treating this acreage without prescribed fire would not be possible. These large and steep burn units are inaccessible to heavy equipment. The cost of reducing thefuels manually would be unfeasible. The location of this project – directly adjacentto high density housing, major infrastructure and the water supply for San Francisco makes the cost of inaction too high. Because of the population density and HWY 280, there can be multiple fire starts each year. The area has a significant fire history which must be addressed under the current trend of large, damaging wildfires.

Response to Comment #23-11: The different environmental settings of each unit are taken into account, including in the mitigations where the environmental differences alter the analysis. For example, Mitigation Measure #7 requires biological monitoring for San Francisco garter snake and California red-legged frog in burn units where they have the potential to occur (Units 3, 5, 7, and 8) and is not applied to units where potential habitat does not exist. Based on the analysis in the MND, most of the mitigations are applicable across all burn units.

Comment #23-12 (FKM): Generalization renders these statements false. Unit 6 is treated annually without a prescribed fire, and is not steep or inaccessible to heavy equipment. No cost analysis hasbeen made to substantiate that manual treatment is “unfeasible”. Unit 7 is not adjacent to high density housing, infrastructure or HWY 280. All areas do not have significant fire history. “The cost of inaction” is not factually established and is a red herring; at issue is the relative cost and impact of alternative methods of wildfire risk reduction. Radically different terrain and the extensive presence of endangered vegetation calls forradically different approaches to fire prevention for each site. The failure to individually address the unique features of each site results in an invalid assessment, and fails to inform decision makers of significant environmental impacts unique to each site.

Response to Comment #23-12: Unit 6 is not treated annually. A small, 50-foot segment along the edge of the property is treated with disking yearly by SFPUC. Additionally, while the area directly abutting the homes is relatively flat, much of the west side of the unit is very steep. Please see Response to Comment #23-11 regarding environmental differences in each unit the analysis and mitigations in the MND.

Comment #24-13 (FKM):

a. Inadequate survey of sensitive communities: The Dudek report, Table 1, shows the ecologist visited units 4 and 6, the two largest burn units, for a total of 4.5 hours on onespring afternoon. The failure to observe the most obvious features of these sites calls into question the survey and assessment for all other site characteristics throughout thestudy. The study relies on a brief search of special status plants with potential to occur in the sites. However, CDFW protocols for evaluating impacts states:

> "Focused surveys" that are limited to habitats known to support special status plants orthat are restricted to lists of likely potential special status plants are not considered floristic in nature and are not adequate to identify all plants in a project area to the level necessary to determine if they are special status plants.
>
> Known occurrences of sensitive species have been overlooked due to inadequate study, andthus lack mitigations.
>
> It was the State's responsibility to find this information and use it to inform its decision. (See Gentry v. City of Murrieta (1995) 36 Cal.App.4th 1359, 1378–1379 ["CEQA places theburden of environmental investigation on government rather than the public."].)

Response to Comment #24-13: The surveys conducted for the MND are considered "reconnaissance surveys", not "focused surveys" The purpose of these surveys is to determine which special status species have the potential to occur in the project area, given the habitat types and nearby species occurrences. The point of these surveys is not to determine absolute presence or absence. Instead, all species which have potential to occur in the project area are addressed and mitigations for these species are developed, as necessary. This includes Mitigation Measure #1, which stipulates that focused floristic level plant surveys must be conducted prior to project work occurring. The remainder of the Mitigation Measures in the *Biological Resources* section address protections for special status plants, and for specific special status animals that may occur in the project area. This includes pre-treatment focused surveys for special status animals immediately before project implementation, as well as biological monitoring during the project itself. Known occurrences of special status species have not been overlooked, and without specific information regarding which species or occurrences the commenter claims have been overlooked, we cannot provide further response regarding this statement.

Comment #23-14 (FKM): Flawed Objectives – "Type Conversion" Not a Legal Objective.The Project Objective #2 (p.6) states:

> Return fire to the landscape, with the goals of maintaining existing native grasslands byslowing shrub encroachment and potentially restoring some areas of shrub encroachment to open native grassland.

a. 2018 California Public Resources code CA Pub Res Code 4483 (2018) https://leginfo.legislature.ca.gov/faces/codes prohibits conducting clearance projectsthat cause type conversion away from native chaparral and scrub:

   4483 (c) Prescribed burning, mastication, herbicide application, mechanical thinning,or other vegetative treatments of chaparral or sage scrub shall occur only if the department finds that the activity will not cause "type conversion" away from the chaparral and coastal sage scrub currently on site.

   The stated project objective violates this CA Code 4483 provision by clearly stating the intent to effect type conversion from shrub to grassland.

Response to Comment #23-14: The quoted section of the MND does not state the intent of CAL FIRE to perform type conversion. CAL FIRE does not intend to convert pure stands of chaparral to grassland. As stated, one of the auxiliary goals of the project would be to reduce shrub encroachment into existing grasslands, not convert current stands of chaparral to grassland. This sentence has been clarified to reflect that goal of reducing shrub encroachment, not cause type conversion.

Comment #23-15 (FKM):

a. "Coastal Prairie" assumption: There is no historical evidence that grassland is the native natural vegetation on all sites. To the contrary, there is some historic suggestion that ranch and dairy concerns in the 1800's cleared native brush to support grazing. One cannot assume that grassland was natural or warrants "restoration". The biodiversitysupported by chaparral communities is of equal importance to the ecosystem.

Response to Comment #23-15: CAL FIRE does not dispute that chaparral communities play an equal and indispensable role in ecosystem health. As discussed in the MND, this project only intends to burn less than 5% of the watershed. Significant expanses of chaparral communities will continue to exist throughout the watershed, as well as through San Mateo county more generally. Once again, restoration of open grassland where woody species encroachment is occurring is an auxiliary goal of the project. The main goal of this project remains fuel reduction and wildfire protection.

Comment #23-16 (FKM):

a. No plan to achieve the objective of restoring "native grassland" to burned areas. Despitethe stated project goal of "maintaining existing native grasslands" no native grass monitoring or restoration plan is provided. Previous CAL FIRE burns at Russian Ridge show that following a burn, invasive species return at a faster rate, resulting in a net loss of native species. Less environmentally damaging methods are proven to be more successful:

"Since few invasive weeds are effectively managed by a single year of prescribed burning, it is often necessary to incorporate other control options into a long-term management strategy (Kyser and DiTomaso 2002)."
https://www.cal-ipc.org/product/use-of-fire-as-a-tool-for-controlling-invasive-plants/

At a minimum, permanent transects are needed to benchmark species. The lack ofenforceable mitigation measures makes it impossible for a third party to verify conformance, thus ensuring failure of the stated objective.

Response to Comment #23-16: Restoration of native grassland is an auxiliary project object and is not the main goal of the project. As stated in the project description and reaffirmed by SFPUC in Comment #1-2, SFPUC will be responsible for post burn monitoring and invasive species control under existing CEQA documents.

Comment #23-17 (FKM):

1. Significant Evidence Disputing the Need of Burn Mitigation at Unit 6.

   a. No documentation supporting the stated "Need for the Project"

      p. 5: With the current trend of hot, intense and large wildfires, the water supply andhigh-density population areas may face increased risk. This project can help preserve water quality by reducing the intensity and spread of a wildfire on thewatershed... By returning fire to the landscape, this project may also positively impact organisms that are adapted to fire.

The terms "may" and "can" are speculative; no evidence is provided to support these claims. In fact, substantial evidence supports a fair argument rebutting these claims.The study lacks detailed mapping and quantification of fuel loads necessary to determine the range, moisture content and volume of fuel-load present, thus callinginto question the need for burn.

Response to Comment #23-17: CAL FIRE disagrees that the detailed mapping and quantification of fuel loads is necessary to determine the need for the project. CAL FIRE has made the determination that there is a need for the project based on the decades of wildland fire experience of CAL FIRE staff involved in the development of the project. The purpose of the MND is to analyze the environmental effects of the proposed project and to determine if the project will have a significant effect on the environment. CEQA does not require the level of analysis requested here to determine project need.

Comment #23-18 (FKM):

d. Current wildfire prevention measures are adequate. Existing wildfire mitigation practices include annual mowing and disking the entire residential boundary of Unit #6to a minimum break of 50 feet. Figure 10 of the MND shows this substantial mow/disk control line. The MND asserts that the existing control lines are adequate such that additional control lines are not required for the prescribed burn:

   p.7 Burn units were chosen adjacent to roads, trails and existing disk lines to limit the amount of control line that must

be constructed. For the proposed project, the widthof dozer line will generally be the width of one dozer blade, approximately 12 feet.

The document is self-contradictory: Existing control lines are adequate, calling intoquestion the need for the project objective to defend the adjacent neighborhood.

Response to Comment #23-18: To clarify, the existing disk lines are adequate as control lines when used during a prescribed burn when conditions are conducive to a low intensity burn and firefighting resources are already present on-site. The disk lines may not be adequate during an uncontrolled wildfire burning on a hot, dry day when fuel moistures are critically low.

Comment #23-19 (FKM):

a. Easy defensible access: Unit# 6 has vehicle access on either paved or gravel roads around the entire perimeter of the property, with multiple access points, as well as access via the CCC track to interior portions. No area of this unit is more than 100 yard from easy access by trucks and mechanized equipment. Evidence supports a fair argument that unit 6 is one of the most easily defendable sites in the SFPUC CrystalSprings tract and does not need abatement.

Response to Comment #23-19: The ease of access does not change the potential for extreme and difficult to control fire behavior caused by increasing shrub cover and fuel loading in Unit 6. Additionally, please see Response to Comment #23-17.

Comment #23-20 (FKM): Unit 6 is already largely grasslands: Figure 10 of the MND shows the mow/disk line abutting properties on the east. In the satellite image of units 4-6 it is evident that the predominant vegetation is invasive grass species, and the report confirms (p.57) “The dominating fuel type is grass, with a variable coyote brush (Baccharis pilularis) component.” There is no evidence that burning grassland will reduce wildfire risk for more than one season, and there is a fair argument that the short-lived benefit of burning grassland is far outweighed by the negative environmental impacts.

Response to Comment #23-20: Prescribed burning of Unit 6 will help prevent further encroachment of coyote brush into currently existing grassland, and eventual conversion of the existing grassland into dense coyote brush scrub with high levels of fuel loading.

Comment #23-21 (FKM): A more detailed evaluation of each individual unit - including the topography, access, vegetation type, fuel load and moisture content, etc. - is required to determine the need for fire in each unique area. The report fails to substantially establish the need for the project at each distinct unit, as required by CEQA standards.

Response to Comment #23-21: Please see Response to Comment #23-17.

Comment #23-22 (FKM): 4. Significant Evidence Disputing the Effectiveness of Fire to Reduce Wildfire Hazard in this Setting.

a. Windblown embers: Studies of wildfires in both northern and southern California the last 3-5 years have revealed that windblown embers have easily overflown freeways and fire breaks, traveling miles to expand fires. The windblown embers of the Camp Fire and Coffee Park skipped miles over both controlled areas and vegetated areas to ignite in the attics and fuel of houses. Even if the entire project unit 4-6 were plowed, in a wind- blown event, embers are likely to overpass the control area and ignite the homes. CAL FIRE has acknowledged that Vegetation Treatment Programs will not be effective during wind-driven fires, the fires that kill the most people and destroy the most homes. https://www.fire.ca.gov/media/5511/top20_destruction.pdf There is ample evidence for the fair argument that a controlled burn of units 4, 5 and 6 will not prevent the hop-scotching of a wildfire in a high-wind event.

Response to Comment #23-22: CAL FIRE agrees that prescribed burning is only part of solution to the wildfire resiliency; please the California’s Wildfire and Forest Resilience Action Plan found here: https://www.fire.ca.gov/media/ps4p2vck/californiawildfireandforestresilienceactionplan.pdf.

Comment #23-23 (FKM): Lower flammability of chaparral and oaks. Studies prove that chaparral and oaks are lessflammable

than dry grasses. "Coyote Brush (Chaparral) leaves have a waxy coating that reduces the amount of moisture lost to evaporation into the air. Best of all, the leaves are fire-retardant, meaning that they have a chemical makeup that reduces their ability to catch on fire." https://blueplanetbiomes.org/coyote_brush.php. Page 34 of the MND even describes the need to dry some shrub in order to facilitate burning, thus contradicting the report's claims of the need for fire suppression: *"Some of the heavier woody material will be crushed or killed prior to burning to increase consumption. This material will be allowed to dry 30 days before burning.*" The MND presents no evidence that converting chaparral habitat to grassland will reduce flammability of project units.

Response to Comment #23-23: The purpose of the proposed project is not to reduce flammability (i.e. the easement of which vegetation ignites), but rather to reduce intensity of a wildland fire and increase firefighters ability to quickly control and contain a fire. The purpose of crushing woody material is to allow the prescribed fire to occur in conditions where fire would not otherwise carry, thereby allowing burning to take place outside of active fire season when suppression resources are available. Coyote brush will readily burn during fire season when fuel moistures are at low levels.

Comment #23-24 (FKM): Ambient temperature lowers fire risk: Oak woodlands and chaparral have been shown to lower surrounding ambient temperatures, thus mitigating heat patterns, slowing the drying of grasses and decreasing fire risk. Shrub has a higher moisture content than grass. Fine fuels (weeds and grasses) that typically replace chaparral *increase* the flammability of the landscape. There is credible evidence that converting chaparral tograssland may increase flammability of the surrounding vegetation.

Response to Comment #23-24: Please see Response to Comment #23-23 above.

Comment #23-25 (FKM): Higher fuel and flammability of invasive species: Research now suggests that native grass species have as much as 90% lower fuel load than invasive species. However, the40-year practice of annual disking of the eastern border of unit 6 has eliminated all natives, leaving only the more flammable invasive species. This SFPUC example is key evidence that practices such as those planned for this project are likely to increase flammability and increase annual abatement needs instead of decreasing them.

Response to Comment #23-25: Please see Response to Comment #23-23 above.

Comment #23-26 (FKM):

1. Failure to Evaluate Alternatives to Burning. The SFPUC 1999 EIR; Chapter III Program Level Environmental Setting and Impacts states: *"Actions to reduce the threat of fire hazards through fuel reduction (Action fir8) or to enhance wildlife habitat (Actions con4 and wil7) could ultimately result in soil erosion. The extent of this erosion would depend on the techniques used and the extent of plant and root-system removal. Some fuel reduction practices are not as severe, such as mowing and pruning. Erosion from thiskind of fuel reduction would be less severe than that from a large prescribed fire."*

The MND fails to consider alternatives to the proposed burn that reduce or eliminateenvironmental impacts, such as:

a. Goats are a proven technique, so much so that goat thefts are up statewide. Goats also reseed vegetation, increase soil permeability, and fertilize. They are able to access steepand rocky sites such as that of unit 4 and 7. Goats have been utilized for over 20 years on the hillside just yards from unit 4 (Knolls Townhomes), proving their safety and effectiveness in areas similar to unit 4.

b. Home hardening: Figure 10 of the MND clearly exhibits the dense vegetation of the abutting residences, which is known to pose a greater fire risk than the vegetation on the adjacent SFPUC lands. Multiple credible sources, including CAL FIRE itself, maintainthat "home hardening" steps are the most successful and cost-effective measures to lower wildfire risk.

   Deniz Enea, Fire Marshall, Woodside Fire Protection District and Chair of the Fire Safe San Mateo Council: *"The main*

reasons homes ignite revolve around how our structuresare built."

Brian Nowiki, California Climate Policy Director, Center for Biological Diversity*: "…weneed to treat those houses themselves and the areas directly around them, not by cutting trees and shrubs away from communities…"*

c. Mowing and manual clearing, less disruptive than plowing and burning, have been proven more effective in restoring native species, and thus naturally reducing the needfor annual fire abatement measures. In fact, the project describes extensive manual preparation of burn sites, calling into question the need for burn when manual efforts have already thinned fuel and created fire-breaks. The most cost-effective approach is to restore the less flammable native species, thus reducing future maintenance needs.

The primary intent of CEQA is to ensure adequate consideration of alternatives that havethe least environmental impact. This study fails to meet minimum CEQA standards in thisregard. There is substantial evidence for the fair argument that alternative methods of risk-abatement would be less costly, more effective at reducing fire risks, and have a lower impact (or even positive impact) on the environment. An analysis of alternatives should be site-specific and include factors such as topography, access, vegetation type, fuelload, moisture content, long-term effectiveness, and cost comparisons.

Response to Comment #23-26: CEQA does not require a formal project alternatives analysis to be included in a Mitigated Negative Declarations. CEQA only specifically require alternatives analysis for Environmental Impact Reports (CEQA Guidelines Section 15126.6).

Comment #23-27 (FKM):

2. Lacking Analysis of Wind Patterns That Play a Major Role in Wildfire Dynamics.

In the event of a wind-driven wildfire, a control west of unit 4 and 6 urban neighborhood may not protect homes from burning:

- The winds that occur during the highest fire risk season – August to November - come from the hot, dry inland areas ("El Diablo's"), blowing westerly. The homes are on the east of the project area, meaning that during the most likely fire-season event, fire willbe blown away from homes, not toward homes.
- Easterly winds, blowing from the proposed burn area toward the homes, occur predominantly in the spring months of March-June. During these months, moisturecontent of the coastal airmass and spring vegetation is a natural wildfire inhibitor.

The study fails to analyze seasonal wind patterns and the seasonal moisture content of vegetation in conjunction with those likely wind patterns. There is evidence to support a fairargument that likely prevailing wind and weather patterns contradict the need for the project at units 4 and 6.

Response to Comment #23-27: Please see Response to Comment #10 regarding wind patterns and Response to Comment #23-17 regarding analysis to determine project need.

Comment #23-28 (FKM):

1. Lacking Binding Conditions of Approval and Enforceable Mitigation Measures.

Repeated burns: Mitigation # 5 mentions repeated burns which are not addressed or analyzed in the Project Plan at all, and exceeds the scope and limits of this MND. Repeatburns are a burden upon adjacent receptors and a documented source of desertification (Some native species, notably manzanita and native grasses, risk total elimination without extended periods between burns.) Failure to disclose and study impacts of repeat burns withholds information necessary to determine whether mitigation measures are adequate to reduce impacts to a less than significant level. Equally important, it denies the public the ability to comment on subsequent projects carried out on these sites. Project Objective #3 – staff training – opens

up the scenario of annualrepeated burn of these parcels for training purposes.

Response to Comment #23-28: Please see the updated project description in the recirculated MND for a description of the timeframe which repeated burns may be conducted.

Comment #23-29 (FKM): Inadequate mapping: Mitigations refer to avoidance of sensitive natural communitiesyet those same communities are included in the mapped burn areas. Oak woodlands, pristine serpentine grasslands and riparian areas, which mitigations state will be excluded from the burn, must be excluded from mapped burn areas. The failure to delineate excluded areas denies the public the ability to enforce the claimed mitigationmeasures.

Response to Comment #23-29: The mitigations do not require exclusion of the aforementioned areas from the burn units, but may stipulate certain restrictions on how the project may be implemented in these areas. Please see the *Biological Resources* section for these mitigations.

Comment #23-30 (FKM):
Lacking details of event and binding conditions of approval. The project description lacksimplementation details needed to determine what mitigations are needed. Discussion ofmitigation measures mentions the expectation of burning 200 acres annually but provides no detail for how sites will be selected or the timing of the burns. 200 acres constitutes the entire acreage of unit 6, and is a far different scenario than burning 10 acres at 20 locations over many years.

Response to Comment #23-30: Burn unit implementation and timing of burns will be decided based on weather conditions and resource availability. This information is not necessary to for the environmental analysis. The analysis assumes that all units will eventually be burnt, at a rate not to exceed 200 acres per year. Burning may occur at any time of year unless restricted by mitigation measures.

Comment #23-31 (FKM): The MND lacks implementation details needed by the public and decision makers in order to determine project impacts and enforce mitigation measures.

Response to Comment #23-31: No response needed, see below to responses to specific comments related to this statement.

Comment #23-32 (FKM):
SFPUC Water quality plan: SFPUC cites water quality as the primary objective for prohibiting pubic access: *"Because of its 150-year history as a protected source of safe,high-quality municipal drinking water, much of the watershed is not open for recreational activity."* https://sfwater.org/index.aspx?page=199 The SFPUC 1999 EIR – Table III.D-4 lists three "Potentially Significant Water Impacts" and all three involve impacts from prescribed burns. In contradiction, on page 64 the MND denies any waterquality plans exist: "*The proposed project has no relation to a water quality control planor sustainable groundwater management plan."*

Even the creation of a limited access trail on SFPUD's Fifield-Cahill Ridge engendered afull Environmental Impact Report, including the alternative of "no project", which wasscrutinized by extensive public debate and required extensive mitigation. https://sfwater.org/modules/showdocument.aspx?documentid=9337 The potential for ashrunoff to impact water quality warrants at least as much environmental analysis.

Burning hundreds of acres of watershed land, some of it directly uphill and less than a mile from the water itself, is an unexplainable contradiction of SFPUC's policies and aglaring omission from the study.

Response to Comment #23-32: The SFPUC 1999 EIR mentioned in the above comment is not a Water Quality Control Plan, which is a specific document produced by the State Water Quality Control Board (SWQCB). The proposed project does not conflict with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan).

Comment #23-33:

a. Impacts of ash runoff: The USGS reports "*Runoff from burned areas contains ash, whichmay have significant effects on the chemistry of receiving waters such as lakes, wetlands, reservoirs, and rivers. Runoff from burned areas also produces higher nitrate,organic carbon, and sediment levels, warmer temperatures, and flashier stream flows.*" https://www.usgs.gov/mission-areas/water-resources/science/water-quality-after- wildfire? The MND affirms this concern:

p. 60 Broadcast burning can result in an increase in run-off, erosion, and sedimentation,particularly in scrub and grassland vegetation types where fire severity is generallyhigher and more bare soil occurs following burning.

Oddly, after citing the potential erosion impacts of burning, the MND evaluates the potential for *herbicide* and *equipment* impacts but provides no analysis of impacts from ash or erosion runoff. The MND dismisses water quality impact with the extraneous statement *"This project can help preserve water quality by reducing the intensity and spread of a wildfire on the watershed",* again employing speculation (*can*) without supporting data, and failing to consider project alternatives having less impact

Response to Comment #23-33: Please see *Geology and Soils (e)* for an analysis of the erosion impacts of the proposed project.

Comment #23-34 (FKM):

1. Air Quality - Net Long-Term Carbon Increase due to Reduced Vegetation.

a. Loss of carbon sink: Chaparral and trees are shown to be a valuable carbon sink; in contrast, burning these fuels releases carbon into the atmosphere contributing to climate warming. Additionally, larger vegetation and trees produce oxygen which improves to air quality. The combined impact of adding smoke particulates to the air while removing carbon sink and oxygen production has a negative impact on air quality,suggesting a fair argument that the project impacts outweigh benefits.

Response to Comment #23-34: While carbon and smoke particulates will be released into the atmosphere, these impacts have been addressed under *Air Quality* and *Greenhouse Gas Emissions* and where determined to be less than significant. This comment does not provide any information which alters the existing analysis of impacts.

Comment #23-35 (FKM):

a. Vegetation removal raises ambient temperatures. When larger vegetation is removed, the finer underlying vegetation and grasses dry faster, leading to a cycle of warmer air masses, increased moisture loss and increased fire risk. Increased ambient temperaturesand transpiration lead to increased wildfires, creating an ever-increasing cycle of warming and air quality impacts. There is a fair argument that the long-term project impacts outweigh the short-term benefits.

Response to Comment #23-25: Overtopping woody vegetation does allow grass fuels to remain green for longer, generally on the order of weeks. This still leaves many months, particularly during peak fire season, when understory grasses are fully cured and receptive to ignition and fire spread. Leaving overtopping woody vegetation in place would not prevent fine fuels from fulling curing during the early part of fire season.

Comment #23-36 (FKM):

1. Inadequate Assessment of Direct Smoke Impacts on Abutting Residents

The MND fails to disclose that at least 50 homes and an elementary school of nearly 400 children *directly* abut burn unit 4 and 6, plus approximately 500 homes are within 500 yardsof these units. Lacking this disclosure, the MND fails to quantify the impacted population, and offers no mitigation for smoke exposure on the burn days, nor subsequent respiratory impacts from lingering odors and dust emanating from a burned area**.** The IS/MND does not inform the decision-makers and the public of the sensitive receptors and potential impacts, as CEQA mandates.

Response to Comment #23-36: The MND has been updated to include the location of Fox Elementary School. The MND is clear that the one of the purposes of the project is to protect homes adjacent to the burn units. The analysis in the MND determined that no mitigation was needed to reduce impacts to a less than significant level with regards to air quality as the burn when will be conducted when conditions will allow smoke to travel away from homes and disperse, and not travel directly into adjacent neighborhoods.

Comment #23-37 FKM):

a. Biological hotspot and indirect impacts: MND page 9 states *"The Peninsula Watershed isalso considered a Biodiversity hotspot."* Hotspots are defined as regions having lost at least 70 percent of original natural habitat, usually due to human activity. On the peninsula, SFPUC lands represent that remaining 30%. Biodiversity is important for ecosystem balance, and all species, regardless of the state of endangerment, play a rolein a balanced ecosystem. CEQA requires, at a minimum, protection of special status species, but in this remaining biodiversity hotspot habitat ALL species should be prioritized for preservation of the ecosystem diversity. Indirect impacts of dislocation and destruction of nesting and forage grounds are not addressed or mitigated. (Shortcomings and omissions of the MND are addressed in further detail under Mitigations.)

Response to Comment #23-37: This comment asks for analysis of certain indirect impacts which are not required under CEQA. No further response needed.

Comment #23-38 (FKM):

a. Habitat islands: Units 4 and 6 are completely surrounded by the unsurpassable barriers of 6-lane freeways, fences and urban development. Bobcats, jackrabbits, woodrats, coyote, deer and various raptors are documented in significant numbers on all units. Dislocation of wildlife into adjacent urban areas, or even adjacent territories, will impact their survival, and can destabilize the ecosystem in a ripple effect.

Response to Comment #23-38: Units 4 and 6 are not completely surrounded by unsurpassable barriers. The southern half of the Kamryn Hill area, between Units 4 and 6 does not fall within a burn unit. Habitat which is not within a burn unit exists to the southwest of Unit 6 (the unused paved road here is not a barrier). Wildlife can disperse under the overpasses on Highway 280. Additionally, both Unity 4 and 6 could not be burned in the same year as their cumulative acreage is 384.2 acres, well over the 200 acre limit. Nor will the entirety of either unit be burnt in one day, we expect to burn no more than 40 – 50 acres per day. Wildlife will have plenty of habitat to disperse to.

Comment #23-39 (FKM): Riparian habitats are protected under multiple federal and state codes, and are habitatfor numerous endangered and special status species. The riparian zones of unit 5 and 8lie at the bottom of a valley where wildfire is unlikely to pose a threat. Species dependent upon these habitats cannot flee oncoming fire, nor is there any suitable habitat where they can flee. Impacts of toxic runoff on the water quality are not analyzed. Alternatives to burning were not considered. The minimal wildfire risk posedby the riparian zones does not outweigh the impacts of eliminating the already diminishing habitat for multiple endangered species.

Response to Comment #23-39: As discussed in the MND, fire intensity will be very low in riparian areas and most vegetation will remain intact owing to the increased moisture present in these drainages. Habitat will not be eliminated, and the remaining vegetation will help filter runoff entering the drainages. This comment does not specify what "toxic" runoff will occur from the prescribed burn. Additionally, this project and supporting documentation has been reviewed by the California Department of Fish and Wildlife (CDFW) and they had no concerns regarding potential impacts to riparian habitat.

Comment #23-40 (FKM):

1. Impacts to Sensitive and Beneficial Plants Inadequately Mitigated.

   Native grasses not delineated. The cover photo on the MND displays the most pristinenative grassland in the bay area, of the highest concentration of endangered species likely remaining in the region. Page 5 of the Dudek report states:

Unit 3. The grassland in the southern portion of the unit is located on a serpentine outcrop and supports high-quality native perennial grassland dominated by purpleneedle grass (Nassella pulchra).

The State of California considers non-serpentine native wildflower fields and native bunchgrass habitats among the rarest and most endangered plant communities in California. As has been shown by studies of 2007-2009 CAL FIRE burns of MidPen's Russian Ridge, native species have a low survival rate of fire, and invasive species areshown to re-establish faster, thus choking out the natives. And those invasive speciesare proven to have a higher fuel load than natives. https://www.ecoseeds.com/contents.html There is substantial evidence for a fair argument that the burn is likely to increase invasive grasses, result in a higher grassland fuel load, and thus fail to achieve the project objective. Site maps should clearly delineate and exclude native grasslands from burn areas.

Response to Comment #23-40: Please see Response to Comment #23-2 regarding invasive plant treatments following project implementation.

Comment #23-41 (FKM): Chaparral beneficial services outweigh fire hazard. "chaparral ecosystems provide critical ecosystem services, most directly through their role in erosion control, hydrology, biomass sequestration, and preservation of biodiversity. These functions willincrease in significance in the future under conditions of reduced precipitation and warmer temperatures." https://www.researchgate.net/publication/324337489_California_Chaparral_and_Its_Global_Significance The MND fails to make a case for removal of chaparral, and fails to offer mitigations to ensure re-establishment ofchaparral instead of invasive weeds following a burn.

Protections for oaks vague and lacking: Oak woodlands have the richest wildlife species abundance of any habitat in California. The oak woodlands in the study area are natural undisturbed habitat, and are considered Sensitive Natural Communities due to their relative rarity and threats to their persistence. The oak woodlands of units 4-6 have thusfar avoided damages from sudden oak death (SOD) which has decimated Woodside and Stanford hills to the south. This healthy forest, especially the young and smaller specimens, provide an opportunity for restoration of native oaks to the region hard hit by SOD. Instead, the plan indicates removal of younger trees regardless of species or health:

p.8 Trees under 10 inches in diameter may need to be thinned or removed toreduce fire intensity in some areas. (Dudek p.2)

There is no evidence of need to interfere with healthy oak groves. Site maps should clearly delineate and exclude oak woodlands from the project areas. Mitigations areneeded to prevent introduction of SOD to these healthy woodlands.

Oak woodlands, chaparral, native grass areas and areas of prior burns should be clearlydelineated and EXCLUDED from the site maps to guarantee non-interference with theseareas.

Response to Comment #23-41: Please see Response to Comment #23-14 regarding type conversion. Please see Response to Comment #23-2 regarding invasive plant treatments following project implementation. Please see Mitigation Measure #16 which stipulates cleaning of equipment prior to entering the project site to reduce spread of SOD. Small oaks may be thinned or removed in areas where they may act as ladder fuels and allow fire to burn into the canopy of mature oaks or other mature tree species. CAL FIRE disagrees with the assessment that all sensitive habitat needs to be removed from the burn units for impacts to be considered less than significant.

Comment #23-42:

1. Objective #3 to Train Personnel is Inappropriate on Biodiversity Hotspot.

Following several years of controlled burns for training purposes on MidPen's Russian Ridgethe burns were determined to have a net negative impact on the environment, leading MidPen to halt the practice at that site. CAL FIRE is thus in search of training sites. However,the CAL FIRE objective of burning for training contradicts the stewardship principles exemplified by SFPUC. This land is some of the most pristine, natural habitat in the state, with one of the highest concentrations of endangered species of both plants and animals.

SFPUC land management objectives are aimed at achieving their goals of safe and clean water supply and long-term health and sustainability of their lands. Practicing with fire doesnot fall within the SFPUC mission.

Response to Comment #23-42: The project description has been updated to clarify the training personal is not the main purpose of the project but is an auxiliary benefit to project implementation.

Comment #23-43 (FKM):
SUMMARY
The project analysis is vague and generalized across project sites of vastly differing conditions,and it omits critical facts. The agency does not have enough information to substantiate the *need* for the project and to determine the impacts of the project or whether the mitigation measures are adequate to reduce those impacts to a less than significant level. The MND fails the CEQA "Fair Argument standard" which holds that under CEQA, an agency must prepare an EIR "whenever it can be fairly argued on the basis of substantial evidence that the project mayhave significant environmental impact."

Response to Comment #23-43: CAL FIRE disagrees with the commenters opinion that the analysis is too vague and generalized to be considered applicable under CEQA. The MND adequately analyses the projects potential impacts and provides mitigations when necessary to reduce these impacts to a less than significant measure. CAL FIRE also disputes that the MND fails the fair argument standard and does not find that there is substantial evidence in light of the whole record that the project may result in significant environmental impacts as mitigated under this MND. Therefore, an EIR is not required.

Comment #23-44(FKM):
ENVIRONMENTAL CHECKLIST AND MITIGATION DISCUSSION

The determination of Mitigated Negative Declaration is incorrect. The vastly differing project sites were not accurately described, and impacts are generalized across vastly differing conditions and therefore not adequately assessed. Multiple categories warrant an assessmentof "*potentially significant impacts*" on at least some units.

This section addresses the sections of the Environmental Checklist for aesthetics, air quality, biological resources (vegetation and wildlife), geology and soils, hazardous materials, water quality, and recreation.

Response to Comment #23-45: This comment introduces the next section of the comment letter, no response is needed.

Comment #23-45 (FKM):
AESTHETICS:

a) The MND mischaracterizes the individual burns as only 1% of the watershed in an individual year. In fact, 200 acres – the suggested single burn– is 100% of unit 6, which is a potentially significant impact to the aesthetics of the land, directly impacting adjoiningresidences and 500 nearby homes, as well as 30,000 CCC track users.

b) Highway 280 is promoted as the "World's Most Beautiful Freeway" due to the scenic section through San Mateo county, and the report confirms *"numerous designated statescenic highways occur in the project vicinity and would have views of the project area."* Aburn area of 200 acres – 1 mile long by 1/3 mile wide – along a scenic route will be a *potentially significant impact* to the scenic resources, for which no mitigation is proposed.

c) All burn sites are on distinctly non-urban land where the character and quality of publicviews of the site will have potentially significant impact to public views.

Response to Comment #23-45: This comment states an opinion that the acreage burned in a given year would be a significant impact. Please see the *Aesthetics* section of the MND for CAL FIRE's analysis on why these impacts would be less than significant, given the relatively small percentage of the viewshed that would be impacted and the temporary impacts of project activities.

Comment #23-46 (FKM):

b) Vegetation is widely acknowledged as an effective carbon sink, and has the added benefit of oxygen production, both qualities that mitigate global warming. The combined impact of decreasing beneficial vegetation with an emission-producing firemay result in a net long-term increase in pollutants.

Fuel reduction is not a relevant mitigation for air-quality and health impacts.

A 200-acre burn, if done in in one event, will have a potentially significant impact on airquality and directly impact sensitive receptors in the vicinity.

The assertion that "*treating this acreage without prescribed fire would not be possible*"is speculative and contradicted in the report by assertions that unit 6 control lines are adequate to prevent fire spread.

Response to Comment #23-46: This comment states that a 200-acre burn would have a potentially significant impact on air quality. The comment provides no evidence regarding why this impact would be significant. As stated in the *Air Quality* section, prescribed burning would only be conducted with approval from the Bay Area Air Quality Management District (BAAQMB) under a smoke management plan that atmospheric conditions are appropriate for smoke dispersal and that emissions of particulates are within the BAAQMB's allowed daily limits. Additionally, as clarified in the project description, a 200-acre burn would not be conducted in one day and would be performed in 40-50 acre sections.

Comment #23-47 (FKM):

The project may expose sensitive receptors to substantial pollutant concentrations. Thereport states *"The project area is located adjacent to a dense urban area with sensitive receptors including schools, hospitals, senior housing and State Highways among others."* If the stated 200 acres (150 football fields) is burned in one event next to thisurban population there will be significant exposure of sensitive receptors. Risks are increased for the young and the elderly who constitute a large percent of the adjacentpopulation. Smoke entering homes through vents and windows can damage property and lead to long term health issues. The study fails to quantify receptors and fails to demonstrate less than significant impacts.

Public notification is not a relevant mitigation for exposure to pollutants; knowing of theevent does not reduce, eliminate or mitigate the impacts. General public announcementis not adequate to reach all individuals; direct notification is warranted and does not pose a burden on the agency.

Response to Comment #23-47: As stated in the MND, the prescribed burn will only be conducted when atmospheric conditions allow for upward travel of smoke and dispersal without blowing large amounts of smoke into adjacent residential areas. Contrary to what is stated above, notification does allow residents to reduce their risk by avoiding outdoor activities and closing windows in their homes. The commenter requests direct notification for all adjacent residents. As the prescribed burn windows are highly dependent on weather, the exact day a prescribed burn will commence can only be decided a few days in advance. Additionally, the exact day and time a prescribed burn may commence may change slightly as the exact day approaches and more accurate weather forecasts are made available. CAL FIRE will make every attempt to notify residents via numerous channels with as much warning as possible prior to the burn.

Comment #23-48:

The report fails to evaluate air quality impacts *following* the immediate smoke dispersal. Emissions and residual odors may linger in the area for days after a fire. There is no datato support the MND claim that lingering smoke and odors will not affect the population:

p. 35 "The smell of smoke may be present in the area for a day or two, however it is not expected to adversely affect the population. This should be balanced with the fuelreduction benefits this project offered to homes directly adjacent to the burn unit."

To the contrary, there is evidence for a fair argument that subsequently dispersed particulates can have potentially damaging health effects on a substantial portion of thepopulation. Public health cannot be traded for unquantified "fuel reduction

benefits."

Anecdotal reference to a winter burn on another SFPUC property is not indicative ofimpacts of a *non*-winter burn at the proposed sites.

Response to Comment #23-48: This comments states on opinion that lingering smells and orders may have potentially damaging health effects on a substantial portion of the population. The commenter provides no evidence for this assertion that smells and odors will have a damaging health effects effect on a substantial portion of the population. As stated above, the prescribed burn will be implemented when atmospheric conditions are conductive to upward rising smoke and dispersal, limiting impacts of lingering odors and smells.

Comment #23-49 (FKM):
BIOLOGICAL RESOURCES:

Direct or indirect impact on special status species:

PLANTS:
Mitigation #1 purports to address special status plant species with a plant survey. Pre-treatment survey alone is inadequate to determine project success; at a minimum permanent transects are needed to establish before and after species populations.

The timing of the burn is critical to the protection and propagation of each species. The MND mentions on pgs 41-42 the seasonal variations in species germination and seeding,and their uniquely different responses to fire. However, lacking site-specific mapping of special status species *together* with the most opportune burn period for each species present at each site, there is no assurance each species will be simultaneously treated at the most opportune time. Site maps need to delineate special status species, and either exclude them from the mapped burn area or address the specific burn season.

Response to Comment #23-49: Mitigation Measures #2, #3, and #4 address timing of project activities as they relate to special status species. These mitigations stipulate when a prescribed burn may occur based on the life history strategy of species potentially present (e.g. annual vs perennial). Site maps will be created once surveys have taken place and address species which need to be avoided based on the criteria presented in the aforementioned Mitigation Measures.

Comment #23-50 (FKM): Mitigations #2, 3, and 4 lack enforceable measurements which are needed to confirm impacts. The mitigation does not provide protection but merely a vague statement thatendangered species "will be avoided wherever possible" At a minimum the mitigation requires detailed mapping of species and the establishment of permanent transects to enable evaluation of the project adherence to these mitigation measures.

Response to Comment #23-50: The mitigation measures listed above initially stipulates that direct impacts will be avoided whenever possible. The remainder of the mitigation measures stipulate what must occur with regards to project implementation if direct impacts cannot be avoided in order for impacts to remain less than significant. Permanent monitoring transects are not required to ensure for adherence to the mitigation measures. Per CEQA requirements, CAL FIRE has included a Mitigation Monitoring and Reporting Program (MMRP) which CAL FIRE and SFPUC will use to certify that Mitigations Measures are being adhered to.

Comment #23-51 (FKM): Mitigation # 5 alludes to repeated burns which are not revealed in the project plan:

Pg. 25: "Sufficient time will be given between burns to allow replenishment of the seedbank. The fire interval required to maintain special status obligate seederswill be determined by a qualified botanist based on a population level, site-specific analysis."

Repeat burns are a documented source of desertification. Some native species, notably manzanita and some native grasses, risk total elimination without extended periods between burns. The agency fails to disclose plans for, or justify the need for,

repeated burns. The report lacks information needed to determine whether the mitigation measures are adequate to reduce impacts to a less than significant level. More over this one mitigation opens the door for repeated annual burns which are outside the scope ofthis project analysis, in violation of CEQA intent.

Response to Comment #23-51: The project description in the recirculated MND has been clarified to describe the frequency which repeat burns may take place. This mitigation prohibits burning at a frequency which will result in the loss of obligate seeder special status shrub species, let alone a frequency which would result in desertification. This mitigation does not allow for repeated annual burns, as this would result in the loss of loss of obligate seeder special status shrub species.

Comment #23-52 (FKM): Mitigations # 13, 14 and 15 address serpentine grassland: Serpentine grasslands are considered sensitive communities not just because of endangered species but becauseof the assemblage of many species in a biodiverse habitat. These mitigations lack protection for the communities as a whole, and promise only to protect "whenever possible" and damage "when it cannot be avoided". This distorts the intention of CEQA which is to *prioritize* the protection of endangered and sensitive species. At a minimumthe mitigation should require advance specific site maps of these communities, exclusion of them from the burn areas entirely, and measurable benchmarks to enabledetermination of impacts after the project.

Response to Comment #23-52: The aforementioned mitigations stipulate to avoid impacts whenever possible, then state explicit project requirements to minimize impacts if direct impacts cannot be avoided (e.g., use of hand line instead of dozer line). Mitigation to a less than significant level does not require exclusion of these areas from the burn units.

Comment #23-53 (FKM): Mitigation #17 fails to provide SOD protocol: The healthy oak woodlands of units 3, 4, 5,6, and 8 should not be encroached upon at all. They pose less fire risk than surrounding habitat and are possibly the most undisturbed oak woodlands in the area. Site maps should clearly delineate these areas as *excluded* from the burn area entirely. Mitigations should require adherence to the California Oak Mortality Task Force guidelines.

Response to Comment #23-53:
Mitigation Measure #17 does provide a SOD protocol, specifically requiring that the equipment and personnel disinfect before entering the project area. Additionally, the project does not include transportation of potentially infected woody material either on-or-off site.

Comment #23-54 (FKM): Lacking enforceable mitigation measures: At a minimum, the project should provide theability of a third-party to verify the impact upon native species. Permanent transects areneeded at all sites and for each vegetation community to ascertain the before and after density and character of native species.

Response to Comment #23-54: This comment again requests permanent transects for monitoring. Please see Response to Comment #23-50.

Comment #23-55 (FKM):

ANIMALS:

Mitigation #6 addresses the *current presence* of Mission Blue butterfly eggs or larvae onlupine but does not address protection of the *host plants themselves*, and states *"activities may commence in the fall without implementing avoidance measures."* Burning at the wrong time can prevent reseeding of host plants, leaving no hosts for subsequent year eggs. It is our understanding that USFWS requires an incidental take permit for removal of host plants, yet this permit is not listed under ENVIRONMENTALPERMITS on page 24. The MND should detail specific plans and mitigations for destruction of host species, and list any permit required.

Bay Checkerspot butterfly is listed by USFWS as threatened. The population and the host plants, plantago erecta, are documented in Edgewood Park, just 1 mile from unit 8and 2 miles from units 5 and 6. Generally, one season is not sufficient for completion ofdevelopment and the larvae must enter dormancy until the following winter when the rains allow plant growth to begin again. This species was omitted from survey.

Response to Comment #23-55: Mitigation Measure #6 requires the protection of host plants if they are occupied by Mission Blue Butterfly (MBB) or are particularly important dispersal habitat for adjacent occupied MBB hose plants. Incidental take coverage is required for take of MBB, however prescribed burning of unoccupied host plants does not trigger the need for an incidental take coverage as it will not result in take. Additionally, it is important to note that the project does not propose "removal" of host plants. Burning will not remove underground tissue, which will allow for regeneration form below ground tissue, and the seedbank of host plants will also not be "removed", allowing for regeneration following the prescribed burn from seed germination. The comment also mentions Bay Checkerspot Butterfly (BCB), and the fact that it occurs near the project area. BCB does occur near the project area at Edgewood Park, however it is restricted to that location and no longer occurs on the SFPUC watershed.

Comment #23-56 (FKM): Mitigation #7 and 9 reference required USFWS and CDFW permits for species relocation:

> *p. 78 "Any San Francisco garter snake or California red-legged frog found in a locationwhere it may be at risk will be captured and released **(if proper permits are obtained from USFWS and CDFW**) in a safe area or allowed to leave the area onits own accord."*

These species are covered under USFWS Endangered Species Act and require an "incidental take permit". Required Environmental Permits should be disclosed on page 24 under ENVIRONMENTAL PERMITS. Release of these endangered species into "a vegetated area near the point of capture" is totally inadequate if the riparian habitat needed for their survival has been altered. The mitigation should require verification ofequivalent healthy riparian habitat for release of any captured animals.

Response to Comment #23-56: Permits are required for handling endangered species under the Federal and California Endangered Species Acts (ESAs). These permits will be acquired if any handling of species will occur. This mitigation does not require relocation of San Francisco garter snake (SFGS) and California red-legged frog (CRLF) and allows for avoidance instead. It is unlikely that the project will acquire these permits, and the avoidance strategy will most likely be used. As these permits are only optional and not required to implement the project, they are not included in the environmental permits sections. If relocation does occur, SFGS and CRLF individuals will be relocated into suitable habitat as determined by a qualified biologist.

Comment #23-57 (FKM): Mitigation #10 addresses the presence of nesting birds but fails to address the reductionof forage habitat or of prey species for raptors. Burning of grassland and shrub can reduce reptile and rodent prey species, forcing raptors to abandon territory, potentially destabilizing the wider population balance. Surveys need to quantify an adequate level of appropriate habitat remaining after the burn to support the documented population.

Response to Comment #23-57: Nesting birds are specifically protected under Fish and Game code. Forage habitat for raptors is not expressly protected by Fish and Game code or under CEQA. As the project only intends to burn an extremely small percentage of the landscape, and impacts will be temporary, impacts to these raptors and their foraging habitat do not require analysis under CEQA.

Comment #23-58 (FKM): Mitigation #11 permits "humane eviction" of endangered species bats. Given the rarityand important role of bats, no eviction is justified for mere fire abatement. All roosts should be left in place until the roost is no longer active, and burn area must exclude such sites.

Response to Comment #23-58: This mitigation does not permit eviction of endangered bat species, rather it allows eviction of bats which are considered species of special concern by CDFW (i.e., not formally listed under the ESAs). Humane eviction of bats considered species of special concern is a common mitigation strategy and is not considered a significant impact under CEQA.

Comment #23-59 (FKM): Mitigation #12 addresses woodrat nests. The dusky footed woodrat plays a vital role in abalanced oak woodland habitat and is a listed "species of concern". The MND fails to identify the large population of woodrat nests in units 4, 5 and 6 and thus fails to require mitigation on those units. For unit 8 the report admits inevitable "mortality of individual woodrats" which contradicts best practices for a listed species. The plan proposes to reduce shrub cover and preserve only a 10-foot buffer around the nest;elimination of forage territory and brush cover will negatively impact survival .Furthermore,

impacts to this mid-level species, which is both prey and predator, canhave a wider impact to the ecosystem balance.

Response to Comment #23-59: As above, San Francisco dusky-footed woodrats are not a formally listed species under the ESAs and are instead considered a species of special concern by CDFW. Please see Appendix B of the MND, which includes a discussion of impacts to San Francisco dusky-footed woodrats, which includes reference to a study which showed no long-term impacts to woodrat populations following prescribed burning in oak woodland.

Comment #23-60 (FKM): Riparian habitat. At a minimum, the riparian communities in the study area are protected under section 1602 of California Fish and Game Code (Lake and Streambed Alteration Program). In addition, all aquatic features in the study area are protected under the federal Clean Water Act, and the State's Porter-Cologne Water Quality Control Act. Riparian areas are habit for several endangered species listed in the report.The report notes riparian areas are lower elevation, vegetation is green and fire intensity is expected to be low, which negates the need to burn these sensitive protected communities at all.

Moreover, broadcast burn is proposed in close proximity on the slopes surrounding these riparian basins. No mitigation is provided for the pollutants of ash and sediment likely to flow down into these sensitive habitats, having a potentially significant impacton the animals and their habitat.

Native and migratory wildlife corridors. The entirety of SFPUC lands are defined as a Biological hotspot. There are large populations of deer, bobcat, fox, coyote, jackrabbit, quail, and other native species that play an important role in diversity and ecological balance. Units 4 -6 are habitat islands, surrounded by 6-lane highways and fenced urbandevelopment. Even those who are capable of fleeing fire have nowhere to flee. Their displacement into surrounding urban areas will have a significant impact on their survival, and displacement into surrounding natural areas can disrupt the eco-balance there. Raptor species are highly territorial and destruction of hunting territory for these birds is not addressed in the MND. No mitigation is offered to reduce direct impact or displacement of these animals, nor impacts of habitat dislocation on the ecosystem balance.

Response to Comment #23-60: Please see Response to Comment #23-39 with regards to impacts to riparian habitat. Please see Response to Comment #23-38 regarding impacts to dispersal of common animal species.

Comment #23-61 (FKM):
GEOLOGY AND SOILS
Risk of landslide. Landslides are a significant risk in burned lands, especially on slopes with unstable soils or steep slopes. Removal of vegetation root structures that stabilizesoils on steep slopes has resulted in deadly landslides in Santa Barbara, and more recently in the Santa Cruz mountains, resulting from heavy rains following a burn.

The City of Belmont has completed geological analysis of the San Juan Canyon and Western Hills, within a mile of unit 4, 5 and 6. Both areas have similar soils and terrain as these project sites, and both studies mapped areas of unstable soils and debris flowson slopes. There is evidence supporting a fair argument that steep burn sites may pose significant risk of landslide in the event of a wet winter. The document lacks detailed mapping of the specific degree of de-foliation on steep slopes, and thus lacks the information needed to determine if mitigation is adequate.

Response to Comment #23-61: As stated in the *Geology and Soils* section of the MND, the low intensity prescribed burn will leave the much of the root structure within the soil intact, in contrast to a high intensity wildfire which often completely strips the soil profile of root structure. The cases the commenter cites were cases of very high intensity wildfire completely denuding the slope of all vegetation and root structure, which will not be the case during the low intensity prescribed burn. This comment does not bring to light any evidence with alters the existing analysis presented in *Geology and Soils.*

Comment #23-62 (FKM):
HAZARDOUS MATERIALS

Hazardous emissions within one-quarter mile of a school. Contrary to the MND statement, burn unit 4 is within 100 yards of Fox Elementary School. There is potentiallysignificant impact to sensitive receptors at this site. At a minimum the document must disclose this fact and provide mitigations as required by CEQA.

Response to Comment #23-62: The MND has been updated to reflect the location of Fox Elementary School. No hazardous materials are proposed to be used near the school.

Comment #23-63 (FKM):
HYDROLOGY AND WATER QUALITY

a) The report states on pg. 60 *"Broadcast burning can result in an increase in run-off, erosion, and sedimentation, particularly in scrub and grassland vegetation types where fire severity is generally higher and more bare soil occurs following burning.""* Yet, no mitigation is offered to address this documented impact. The authors dismiss these impacts with a false comparison to a wildfire event, without considering or evaluating the alternative of no fire (wildfire reduction methods such as goats, manual removal andhome hardening). The report lacks any study of the potential for migration of toxins, burn residue, dust and soil downhill into the adjacent reservoir.

Response to Comment #23-63: Again, CEQA does not require analysis of a no project or other alternatives in an MND. Mitigation is not offered for this impact, as the analysis considered the impact less than significant, thus requiring no mitigation measures. The project as designed leaves ample vegetation intact owing to low fire intensity in drainages, as well as sufficient distance to the reservoir, to allow vegetation to filter the minimal run-off which may occur in the burn units.

Comment #23-64 (FKM): Conflict with water quality control plan. The asserted purpose of the watershed landssurrounding SFPUC's Crystal Springs reservoir is to ensure high quality water and prevent infiltration of contaminants:

"Our mission for managing our watersheds is to provide the best environment forthe production, collection, and storage of the highest quality water for the City and County of San Francisco and suburban customers. We seek to accomplish thisby developing, implementing, and monitoring resource management programs which address all watershed activities. Watershed management programs will apply best management practices for the protection of water and natural resources and their conservation, enhancement, restoration, and maintenance while balancing financial costs and benefits." https://sfwater.org/index.aspx?page=411

Inexplicably, the report states the project has "*no relation to any water quality management plan."* The glaring omission – denial – of the potential impacts upon water quality is striking. The agency does not have enough information to determine what thetrue impact of the project will be and whether the mitigation measures are adequate toreduce those impacts to a less than significant level.

Response to Comment #23-64: Please see Response to Comment #23-32.

Comment #23-65 (FMK):
RECREATION

a) The CCC track is accessed by an estimated 30,000 users on a year-round basis, includingan estimated 17,000 during the cross-country season from August to November. The proposal denies the existence of this use, so provides no mitigation. By limiting the existing recreational use of the CCC track, the project will potentially impact thousands of users who will be diverted to other area trail systems. Nearby Waterdog Open Space,

Pulgas Ridge, Edgewood, Sugarloaf and others are likely to see increased use on thescale of thousands, creating a potentially significant impact.

Response to Comment #23-65: This comment overestimates the displacement of recreation users caused by the CCC track being closed for a few days at most at a time. The *Recreation* section has been updated to clarify the extent to which the

course may be closed. A small number of users may be displaced over the days the course is closed. This temporary and limited displacement will not cause a significant impact to nearby parks.

Comment #23-66 (FKM):
SUMMARY
Because substantial evidence supports a fair argument of potentially significant adverse impacts of the project, including to aesthetics, air quality, biological resources, geology and soils, water quality and recreation, an EIR is required and the negative declaration should notbe adopted. (See *Quail Botanical Gardens Foundation, Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1601–1602.)

Mitigations offered are vague and lack enforceable mitigation measures. Controlled before and after monitoring is completely lacking, making it impossible for a third party to monitor orascertain the success of the project objectives.

Response to Comment #23-66: Please see Response to Comment #23-43 regarding preparation of an EIR. Additionally, as required by CEQA, CAL FIRE has prepared a Mitigation Monitoring and Reporting Program (MMRP) which will serve as verification that mitigations are being adhered to. CEQA does not require a monitoring program to ensure that project objectives are met, only that mitigations are adhered to.

Comment #24-1 (FKM):
Dear Forester Collamer,

We respectfully submit the following studies and publications as documentation supporting ourcomments regarding the Prescribed Burn of units 3, 4, 5, 6 and 8 of this project.

BIOLOGICAL HOTSPOT OF THREATENED SENSITIVE NATURAL COMMUNITIES

These units are comprised of mixed shrub and grassland. Some areas exhibit a high density of native grasses, and some have protected riparian habitats, while others have nearly pristine natural oak woodlands. All harbor endangered species of either plants or animals, and all represent sensitive naturalcommunities. In the bay area how many such pockets remain? Does it make sense to burn our few remaining native habitats when there are so many *alternative, less damaging ways* to *sustainably* manage the fire risk?

Kristi Lazar (Rare Plant Botanist, Botany Data Manager, California Natural Diversity Database (CNDDB), Department of Fish and Wildlife) wrote "*For the two vegetation types of serpentine grassland and purpleneedlegrass, it is possible to have a vegetation community be sensitive but the species that make up the community may not be rare species by themselves. It is the assemblage that is rare."*

Response to Comment #24-1: This comment discusses sensitive habitats which are acknowledged in the MND and mitigated for where necessary. This comment does not provide new evidence which changes the analysis in the MND, but rather expresses the commenters opinion that the project should not be approved.

Comment #24-2 (FKM):
As you will read in the sources provided below:

1. These SFPUC lands are ranked a biodiversity hotspot, recognized for their significant reservoir of biodiversity which is threatened by human interference, and having already lost 70% of their originalhabitat
2. There is evidence that these units were likely largely shrub covered, but that burning by indigenouspeoples and subsequent grazing converted them to grass. Shrubland is now reclaiming its natural extent. This is a good thing for California since shrubland is shown to be less flammable than grasslands.
3. The damaging fires of recent years have been wind-blown, and there is no evidence that burning grassland provides any increased protection during a wind-blown fire. Embers travel miles to ignitein attics and home landscaping. Photos included here show the trees abutting unit 6 homes in Belmont pose a fire risk that cannot be mitigated even by

stripping the entire unit of vegetation.

4. Numerous studies have shown that following a burn, invasive grasses return much faster than nativegrasses, and quickly rebuild the fuel load. For shrubs, out of season burns, as proposed by this project, disadvantage native shrub species that need a longer season to recover.
5. Both these scenarios set up a cycle of more invasives with higher fuel load, requiring annual burns. Aregime of annual burns cumulatively adds to more GHG, not less, and eventually leads to desertification and increased global warming. This suggests your GHG analysis is flawed.

Response to Comment #24-2: This comment summarizes the sources provided remainder of the comment letter and does not require a response.

Comment #24-3 (FKM): Rare Plant Hotspots in San Mateo and Santa Clara Counties Elan Alfred, CNPS, 2017 https://www.cnps-scv.org/conservation/rare-plants/322-rare-plant-hotspots "The Peninsula Watershed Golden Gate Recreational Area and San Bruno Mountain are mountainous hotspots in the Central Coast subregion. Edgewood Natural Preserve and Crystal Springs County Park are associated with an ultramafic corridor in the San Andreas rift zone in San Mateo County." The map below is a summary figure based on 762 database records and shows where records are clustered in the two counties. The map shows the areas with the highest data point density. Notice that the lands surrounding the Crystal Springs watershed are the highest density rare plant hotspots in the area.

Fire and Invasive Plants on California Landscapes, Keely, Franklin and D'Antonio, 2011
https://link.springer.com/chapter/10.1007%2F978-94-007-0301-8_8

"The initially "open" (grassland or forbland) habitats created by indigenous burning likely were maintained by intensive livestock grazing during the mission era (Minnich 2008). During the last 100years, fire was apparently used to convert shrublands to annual grasslands as the expansion of agriculture in the late 1800s reduced available open lands for grazing (Tyler et al. 2007). "

"The trend of increased presence of woody vegetation on landscapes previously supporting extensive grassland is particularly apparent in the San Francisco Bay area. Contrary to conventional wisdom, this trend is not related to disruption of the natural fire regime by fire suppression, but rather due to a reduction in anthropogenic ignitions and cessation of intensive livestock grazing (Keeley 2005). Thus, this so-called shrubland invasion is perhaps better viewed as a recolonization following the cessation of anthropogenic disturbance, at least for the dominant native shrub, coyotebush (*Baccharis pilularis*)."

"However, as fire intensity decreases, alien invasion increases due to a variety of correlated factors.Lower fire intensity occurs in more open stands with a mixture of grasses and shrubs; thus, they arelikely to have more alien propagules in the soil at the time of fire. Reduced native recovery has been reported for out-of-season prescribed burns (Keeley 2006b) and this vacuum is always filledwith alien species. The mechanism by which out-of-season burning decreases native plant recoveryis unknown, but it is commonly attributed to prescribed burns during winter or spring that cause heating of seed banks with moist heat, which is often lethal (Parker 1987). Perhaps more importantthough is that winter burning greatly decreases the length of the first growing season. For most seedlings having the growing season reduced from a typical 6 months (following summer or fall burns) to perhaps as little as 1 month (following a winter burn) could limit survival during the ensuing dry summer."

"In a meta-analysis of the outcome of fire management treatments across California grasslands, Bainbridge and D'Antonio (in prep.; reanalysis of Corbin et al. 2004) found that fire can depress the abundance of European annual grasses, but only for the immediate season after fire."

Emily J. Fusco, John T. Finn, Jennifer K. Balch, R. Chelsea Nagy, and Bethany A. Bradley
Proceedings of the National Academy of Sciences, 2019; 201908253 DOI: 10.1073/pnas.1908253116

"Nonnative invasive grasses can promote fire, creating new fire regimes that are unsuitable for native species and lead to lower diversity and localized extinctions (1, 2). The altered fire regimes also create favorable conditions for the invasive grasses, which recover and spread quickly postfire,resulting in a "grassfire cycle.""

"Consistent and repeated collection of invasive species abundance information is rare but critical forunderstanding impacts (50) and could improve our models. Therefore, given the nature of these data, our results likely provide a conservative estimate of invasive grass impacts on fire."

"In the regions highlighted by this analysis, we suggest that fire and invasive species managers worktogether to create integrated management plans that account for invasive grass-fire interactions."

Introduced annual grass increases regional fire activity across the arid western USA (1980–2009)
JENNIFER K. BALCH*†, BETHANY A. BRADLEY‡, CARLA M. D'ANTONIO and JOSE GO MEZ-DANS
http://people.umass.edu/bethanyb/Balch%20et%20al.%2C%202013%20GCB.pdf

"MODIS records show that 13% of these cheatgrass-dominated lands burned, resulting in a fire return interval of 78 years for any given location within cheatgrass. This proportion was more than double the amount burned across all other vegetation types (range: 0.5–6% burned). Furthermore, multi-date fires that burned across multiple vegetation types were significantly more likely to have started in cheat-grass. Finally, cheatgrass fires showed a strong interannual response to wet years, atrend only weakly observed in native vegetation types. These results demonstrate that cheatgrass invasion has substantially altered the regional fire regime. Although this result has been suspected by managers for decades, this study is the first to document recent cheatgrass-driven fire regimes ata regional scale."

Fremontonia Journal of the California Native Plant Society, April – July 2010

https://www.cnps.org/wp-content/uploads/2018/03/Fremontia_Vol38-No2-3.pdf

Fire on California Landscapes; Jon E. Keeley
"The majority of our landscape is not forested and humans have not reduced fire frequency, but rather have radically increased burning (Halsey 2004). In many places this has had the unfortunate impact of type converting native shrublands to nonnative grass and forb lands as outlined by Lambert, D'Antonio, and Dudley in this issue. As a member of the California Native Plant Society, thistype conversion concerns me because of the loss of both native flora and fauna. As an *ecologist* this concerns me because of the change in functional types from deep-rooted shrubs that can hold soils on steep slopes, to shallow rooted herbs. As a *fire scientist* this concerns me because of the change in fire season from about 6 months in shrublands to 12 months in annual grasslands, and lastly as a *scientist* this is of concern due to the loss in the capacity for carbon storage and potential impacts onclimate."

"Rather it is common for homes to burn from embers entering vents or igniting piles of dead leaveson roofs or gutters. Since embers can travel a mile or more, clearance zones are not likely to be highly effective in altering housing losses in many instances."

https://wildlife.ca.gov/Conservation/Survey-Protocols
Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inlineState of California Natural Resources Agency Dept of Fish and Wildlife, March 20, 2018

"Special status plants, for the purposes of this document, include all plants that meet one or moreof the following criteria:

Listed or candidates for listing by the State of California as threatened or endangered under CESA (Fish & G. Code, § 2050 et seq.) "Threatened species" means a native species or subspecies of plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts requiredby CESA (Fish & G. Code, § 2067). "Candidate species" means a native species or subspecies of plantthat the California Fish and Game Commission has formally noticed as being under review by CDFW for addition to either the list of endangered species or the list of threatened species, or a species forwhich the California Fish and Game Commission has published a notice of proposed regulation to add the species to either list (Fish & G. Code, § 2068).

Sensitive natural communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communitiesmay or may not contain special status plants or their habitat. CDFW's List of California Terrestrial Natural Communities 7 is based on the best available information, and indicates which natural communities are considered sensitive at the current stage of the California vegetation classification

effort."

*"*Impacts to CRPR 3 plants may warrant consideration under CEQA if sufficient information is available to assess potential impacts to such plants. Impacts to CRPR 4 plants may warrant consideration under CEQA if cumulative impacts to such plants are significant enough to affect theiroverall rarity.

"Focused surveys" that are limited to habitats known to support special status plants or that are restricted to lists of likely potential special status plants are not considered floristic in nature and are not adequate to identify all plants in a project area to the level necessary to determine if theyare special status plants."

"Conduct botanical field surveys by traversing the entire project area to ensure thorough coverage,documenting all plant taxa observed. Parallel survey transects may be necessary to ensure thorough survey coverage in some habitats."

"Conduct botanical field surveys in the field at the times of year when plants will be both evidentand identifiable. Usually this is during flowering or fruiting. Space botanical field survey visits throughout the growing season to accurately determine what plants exist in the project area."

Response to Comment #24-3: This comment provides links to literature sources and summaries of their findings. The purpose of these sources is to support the commenters opinion on what the project analysis requires. Each of these is addressed below.

Comment #24-4 (FKM): Taken together these sources provide a framework that should be applied to the analysis of these burn units. The project analysis requires:

A floristic survey is required to fully identify ALL species of concern, including those "threatened","considered" and "endangered", as well as "sensitive natural communities."

Response to Comment #24-4: Mitigation Measure #1 requires floristic level plant surveys prior to work commencing in a given burn unit.

Comment #24-5 (FKM): Each site requires a separate analysis, and specifically targeted mitigations applicable to the survey findings of that site.

Response to Comment #24-5: It is unclear what the commenter means when they request a "separate analysis". Mitigations already are specific to individual units when applicable. For example, Mitigation Measure #7 requires biological monitoring for San Francisco garter snake and California red-legged frog in burn units where they have the potential to occur (Units 3, 5, 7, and 8). Most of the mitigations are applicable across all burn units.

Comment #24-6 (FKM): Site maps should EXCLUDE non-burn areas. This includes areas with a high density of species of concern (an assemblage), areas surrounding endangered species, riparian habitats, oak woodlands,areas previously burned, and high-quality chaparral. This is the only way for the public to ensure compliance with the proposed mitigations.

Response to Comment #24-6: Please see Response to Comment #23-29.

Comment #24-7 (FKM): Permanent transects are required, with measurement of before and after species counts, in order toascertain the success of the objective of reducing fuel load and invasive species and restoring nativespecies.

Response to Comment #24-7: Please see Response to Comment #23-5.

Comment #24-8 (FKM): Burn plans should clearly specify planned burn season and demonstrate that the timing of the burn will not kill or disadvantage native species and advantage invasives.

Response to Comment #24-8: Vegetation monitoring and invasive species treatment will occur following project implementation. Please see Response to Comment #23-2.

Comment #24-9 (FKM): Burn plans should specifically map and INCLUDE non-native high-fuel trees bordering unit 6, and throughout all units which pose the real fire risk.

Response to Comment #24-9: Non-native trees are included with some of the units and will be included in the burn treatments. Non-native trees which occur outside of the burn units are not within the scope of this project.

Comment #25 (PC): I am opposed to the proposed controlled burns, which we are only discussing because Global Warming/Climate Change has made our state hotter and drier and more prone to a longer wildfire season with wildfires that burn hotter. So our State officials naturally want to ally people's fear of wildfire threat to their homes by doing something to mitigate the threat of wildfires. However, our course of action must be well thought out and not simply a knee-jerk reaction to make people feel good that something, anything, is being done. I believe controlledburns are not well thought out, and not the best course of action, or best use of our limited resources to mitigate the threat of wildfire damage.

Global warming/climate change is caused by humans not only spewing too much Greenhouse Gases (GHG), such as carbon dioxide and methane, into our atmosphere but also by destroying natural environments that are carbon gatherers, thereby not only decreasing our planet's ability togather carbon but also releasing the stored carbon from the gatherers, increasing Global Warming/Climate Change. So the irony here is that by destroying the carbon gatherers with a controlled burn, under the guise of mitigating the damage caused by wildfire, you are actually increasing our chances of more wildfire by releasing more carbon into our atmosphere and decreasing our planet's ability to gather carbon, making our state hotter and drier, and our fire season longer and longer. Just as in the past suppressing wildfire was a knee-jerk reaction, that has wrought more problems than it solved, the controlled, and unnecessary, burning of the natural carbon gathering environment will also bring more foreseen and un-foreseen problems than it will solve.

We are mainly concerned with wildfire because we don't want out homes to burn, however weneed to be thoughtful regarding our solutions to protecting our homes. Everyone knows hardening homes is the best solution to prevent them from burning. See attached document.

Engaging in a vicious annual knee-jerk cycle of burning carbon gatherers thereby increasingGlobal Warming/Climate Change and making wildfires, and the threat to our homes, more imminent is counter to the solution of the problem we all want to address. The main cause of wildfire threat to homes is flying embers and firebrands, which can fly over amile in windy conditions. See attached document. Accordingly, telling people that controlled burns will make their homes safer gives people a false sense of security into thinking they don't need to harden their homes thereby putting their home, and nearby homes, at risk of wildfire damage from flying embers. Burning less than a thousand acres in this area that is surrounded bythousands of acres of beautiful open space will do very little to nothing to prevent flying embers from starting homes on fire, thereby increasing flying embers and the chances that more homes will also be set on fire.

I'm very impressed with Cal Fire's ability to fight wildfires but very disappointed with their slash and burn migration efforts. All the money that Cal Fire will use for controlled burns shouldbe redirected to hardening homes susceptible to wildfires; the real solution to protecting homes from the threat of wildfires. All agencies must work together and pool their resources to mitigateGlobal Warming/Climate Change and its threatening effects on our homes. Anything less is just bureaucratic posturing.

Response to Comment #25: Following project implementation, vegetation will regrow and continue to sequester carbon. Additionally, the purpose of the project is help prevent a large scale, high intensity fire, which will result in significantly more greenhouse gas emissions than a low intensity prescribed burn. Please see the analysis *Greenhouse Gas Emission* section of the MND for more information. Home hardening is outside the scope of this project and is the responsibility of the homeowner. There is a program under development by the California's Governors Office of Emergency Services to provide financial help to low- and moderate-income households who live in extreme wildfire risk areas. The program will prioritize those with high social vulnerability.

Comment #26-1 (LG):
Hello Sarah,

I am a Belmont resident living 1/8 of a mile away from Burn Plot #6.

I've read the MND and attended the recent Zoom call in late March.

While I support the overall plan, I am concerned that several issues of concern were not documented:

Response to Comment #26-1: This serves as an introduction to the comment letter. No response is needed.

Comment #26-2 (LG): Scope of the burn: there are numerous, health coastal live oaks. Based on how the MND is worded, these will all be removed. During the Zoom meeting it was stated that not all vegetation within a prescribed burn area would be removed. This is inconsistent with the MND…

Response to Comment #26-2: The MND allows for removal of small oaks, less than 10 inches diameter, in order to reduce ladder fuels which may allow fire the reach into the canopy of large, mature oak trees or other tree species. Large, mature, healthy oaks will not be removed as part of this project.

Comment #26-3 (LG):

- Timing of the burn: the document states that up to 200 acres will be burned per year. Plot #6 is 199 acres.
    - Will the burn happen all at once? Rich said no, but the MND doesn't state so.

Response to Comment #26-3: The environmental impact analysis in the MND is based off up to 200 acres being burned in one year. It would not be feasible to burn 200 acres at once. Each burn will likely be 40 – 50 acres. A large unit such as Unit 6 would not be burned all at one time.

Comment #26-4 (LG):

- The MND stated that all parties who needed to be made aware of this had been notified. This is not correct.
    - Dozens of residents bordering Zone #6 got no notification
    - Elected Officials didn't know about this (I notified Mayor Charles Stone who confirmed as much, before he reached out to Rich Sampson)
    - San Mateo Consolidated Fire Department (Belmont, Foster City and San Mateo) were not aware of the plan
    - I found out only because a resident spotted a single 8 ½ x 11 sheet of paper inside the Crystal Springs Cross Country Course with the notification (this was pretty much hidden from the public)

Responses #26-4: Notifications were made as required under CEQA. Please see Response to Comment #23-9.

Comment #26-5 (LG):

- The CSCCC is used by thousands of students from dozens of schools in the area for cross country races. How will the burn impact their schedules? Will the current trails be preserved and will the burn planning take steps to mitigate the impact of the burn on the course? If the burn happens all at once, how many weeks/months will it be unavailable for student runners?

Response to Comment #26-5: Please see the updated *Recreation* section in the recirculated MND. The course will only be closed for a few days at a time at most, and coordination will occur to insure that burning does not conflict with cross country races. The trails will remain intact following the burn.

Comment #26-6 (LG):
If I understood correctly, Rich said that the issues were not to be of concern and that they may be documented in further documents but that these new documents would not be open to public comment.

Because of this, I think it is appropriate to have the MND revised to address these issues and that a revised MND be released for public comment.

Response to Comment #26-6: A revised MND has been released for public comment.

Comment #27-1 (DB):
I request that the Department mail Notices of Intent of the upcoming revised MND to all residences adjacent to or near the proposed burn sites. I request to be put on the Department's NOI list for this and all Department actions near my home in Belmont Heights. Most residentsremain unaware of the proposal to burn these areas.

The MND states the Project Objectives are:

1. Create or maintain areas of reduced vegetation with the goal to reduce fuel loadingand woody fuel continuity where firefighting tactics can be more successful, thereby increasing the safety of neighborhoods near the SFPUC Watershed.

2. maintaining existing native grasslands by slowing shrub encroachment and potentiallyrestoring some areas of shrub encroachment to open native grassland

3. Train CAL FIRE personnel in firing and control techniques.

Response to Comment #27-1 (DB): CAL FIRE will send a Notification of Intent for the recirculated MND when released to this commenter, however the commenter cannot make a blanket request that a NOI be mailed to all homeowners adjacent to the project. If those homeowners wish to be notified in this manner, they will be required to make that request individually in writing. The remainder of the comment summarizes the project objectives as stated in the original MND. Please see the recirculated MND for changes to the project description.

Comment #27-2 (DB):

I. California Environmental Quality Act

The purpose of California Environmental Quality Act (CEQA) is to prevent or minimize damageto the environment through development of project alternatives, mitigation measures, and mitigation monitoring. The Department of Forestry is required to consider alternative actions thatwould minimize damage to the environment. The Department must take a hard look at the content, data and information submitted via public comments to determine whether alternative actions may be taken to achieve the claimed objectives of the proposed action.

The current MND fails to adequately disclose endangered and threated species in the project location, provide accurate information about the project location, consider and evaluate potentialenvironmental effects that could result from the proposed action and consider alternative actionsthat would work towards the cited goals. Because the proposed action includes a precedent- setting action of burning watershed lands near to or adjacent to an urban neighborhood (Plots 4, 5 and 6), an EIR is needed to conduct in-depth studies of potential impacts, measures to reduce or avoid those impacts, and an analysis of alternatives to the project.

CEQA Guidelines §15070 states a Negative Declaration or Mitigated Negative Declaration maybe prepared when:

> *The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or The initial study identifies potentially significant effects, but:(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearlyno significant effects would occur, and (2) There is no substantial evidence, in lightof the whole record before the agency, that the project as revised may have a significant effect on the environment.*

CEQA § 21080 states, "If there is substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment, an environmentalimpact report shall be prepared." CEQA also states, "substantial evidence includes fact" or "a reasonable assumption predicated upon fact."[5]

The inadequacies in the MND and comments herein outline that there is a reasonable assumptionpredicated upon fact (or

[5] For the purposes of this section and this division, substantial evidence includes fact, areasonable assumption predicated upon fact, or expert opinion supported by fact.

substantial evidence) that the project may have a significant effect on the environment and therefore an Environmental Impact Report must be prepared.

Response to Comment #27-2: This comment requests the preparation of an EIR for the proposed project. Please to Response to Comment #23-43.

Comment #27-3 (DB):

I. MND Stated Goal 1: Increasing the Safety of Neighborhoods Near SFPUC Watershed

Goal one appears to be largely designated for Plots 4 and 6 (and Plot 8 which has a small numberof adjacent homes). Plots 3, 5 and 7 are not near neighborhoods and therefore this objective doesnot apply.

Regarding Plots 4 and 6, as stated in the MND, "SFPUC currently undertakes fuel reduction activities, such as mowing, disking and mastication." Given SFPUC wildfire mitigation actionswhich have been ongoing for decades, Plots 4 and 6 have well-established existing firebreaks which exceed the 100-foot recommendation. Additionally, the Watershed (Plot 6) behind the Belmont Heights neighborhood is largely a running course with wide dirt trails providing additional firebreak areas. For Plots 4 and 6, adjacent areas to the mowed/disked firebreak is sparce vegetation largely comprised of grass which could be mowed if necessary.

The MND fails to state that a wider firebreak is needed to protect homes. The MND fails toconsider widening the mowed firebreak in order to mitigate the a more extreme, environmentally-destructive action of burning the entire area to achieve the stated goal of increasing the safety of the neighborhood. The majority of vegetation in Plots 4 and 6 is sufficiently distanced from homes on St. James Road and Hallmark Drive as per Californiarecommendations and requirements.

The MND fails to analyze scenarios how a wildfire is to spread to the Neighborhood – a necessary component to determine whether the drastic burn proposal is truly the least environmentally harmful action that could achieve the stated desired objective. The MND must(and in its current form fails to) consider that if a wildfire were to occur in Plots 4 or 6 it wouldlikely be caused by activities on Highway 280. Yet the MND fails to consider mowing a 100- foot firebreak along Highway 280 to prevent a wildfire from spreading to the Neighborhood.
Flying embers could also cause a wildfire to occur in the Watershed; however, similar flying embers could also ignite homes given that most homes in the Neighborhood have not been hardened largely because the State is not focused on making homes safer, but rather focuses oneliminating native habitat.

The MND fails to outline any rationale or data that supports the selection of Plots 4 and 6 for theproposed action rather that other areas that are adjacent to urban neighborhoods. The lack of dataindicates the selection to be arbitrary and this is insufficient to implement such a precedent- setting burn in the area. There is no historic practice of conducting a prescribed burn behind homes in this area and none has occurred on these plots. Due to the controversial nature of this burn and the precedent-setting nature of this proposed action, an EIR is needed to determine thatthis extreme action is necessary to achieve the stated objective(s). There are many SFPUC Watershed lands and other open spaces that are adjacent to urban neighborhoods throughout the Peninsula which are not targeted for prescribed burns. Indeed, it would be impossible to target toburn all open spaces adjacent to all neighborhoods in the Bay Area or the region.

The MND fails to consider alternative actions that would Increase Neighborhood Safety and have less of a negative impact on the environment including but not limited to the facts that the prescribed burn will destroy native chaparral and sage scrub plant communities, likely kill nativewildlife (including reptiles, endangered woodrats, ground-dwelling animals), contribute to CO_2 emissions and destroy the natural esthetic beauty of the Watershed's native plant communities which I have come to love and cherish. I have lived in this area for most of the past 40 years, I will be harmed if this proposed action is implemented for the above-mentioned reasons.

Response to Comment #27-3: Please see Response to comment #23-26.

Comment #27-4 (DB):
MND Stated Goal 2: Slowing Shrub Encroachment; Restoring Shrub Encroachment toOpen Native Grasslands.

A. MND Outlines Intention to Convert Chaparral and Sage Scrub Communities to Grasslands

The MND has outlined the Department's intention to kill and convert chaparral and sage shrubs to grasslands: "pretreatment involves killing some or all shrub species in a unit" and "crushingstands of shrubs by driving a bulldozer with its blade lifted through stands" and "limited amounts of brush may be pretreated by herbicide application and/or by cutting with chainsaws" and "Hand crews utilizing chainsaws will cut and remove woody material (both living and dead)"…

Clearly the MND intention is "maintaining" and "restoring some areas of shrubencroachment to open native grassland."

The MND refers to chaparral and sage scrub plant communities as "shrub" and "woody material." Coyote brush is a predominate plant in most chaparral communities. Plots 4 and 6 arethriving chaparral plant communities – with a variety of associated plants scattered throughout --including lupin, manzanitas, sage and others. Chaparral community plants are symbiotic and native; yet the MND refers to them as "woody materials" or "shrubs" and as something to be eradicated. All plots included in the proposed action (with the exception of the Skyline plot) are native chaparral and sage scrub plant communities.

Coyote brush and Lupin are common chaparral plants – living on ridges, slopes, canyons, coastalscrub. These are symbiotic plants that support a host of native species including the Mission Blue Butterfly which I have observed in the area.

Response to Comment #27-4 (DB): Please see Response to Comment #23-14.

Comment #27-5: The MND notes Schirokauer et al (2003) could not map native grasslands and instead mapped 'grasslands' on the Peninsula Watershed as "California Annual Grasslands." This designation as "grasslands" clearly does not indicate these are native species. The MND is incorrect to state that"these areas have a component of, or are dominated by, native bunchgrass vegetation (primarily needlegrass, *Stipa* sp. and *Danthonia californica*), and would be considered native grassland based on currently accepted definitions (>10% cover native grass species)." That is simply not true for the "grasslands" in Plots 4 and 6. While there are native grasses in the chaparral communities – it would not qualify as "grasslands."

The primary "grass" found in Plots 4 and 6 are cheatgrass. Cheatgrass was introduced in the western United States in the 1800s. The Cheatgrass invasion is connected to the expansion oflivestock grazing which largely destroyed ecological conditions by overgrazing which contributed the fast invasion of the non-native grass.[2]

The MND has factually inaccurate information regarding the historic and current composition ofPlots 4 and 6. The MND states, "Substantial areas dominated by grassland occur through the project area. Some areas include exotics such as French broom (*Genista monspessulana*), Monterey pine and eucalyptus. A limited amount of dense oak woodland also is found here."

Firstly, Plots 4 and 6 do have exotics – a limited number of pine trees and cheatgrass – no (or very little) French broom. The MND fails to consider removing the exotic pine trees and mowingcheatgrass as a less extreme action to achieve the stated objective. Cheatgrass is more pervasive in areas of Plot 6 likely due to human usage of the running course. Outside of the running course area in Plot 6 and throughout the majority of Plot 4 the majority of habitat is native chaparral andsage scrub plant communities – the very communities that CPR 4483 intended to protect. More on CPR 4483 below. It is well established that human disturbance is the cause for the expansion of cheatgrass throughout the area (and country).

Response to Comment #27-5: This comment mischaracterizes the 10% native grass cover metric. This is meant to delineate

non-native annual grassland from native perennial grassland. It does not mean that a chaparral community with greater than 10% native grass cover would be considered pure grassland. The MND does not claim that only exotic plant species are the ones quoted above, nor that Unit 4 and 6 is without exotics. The section of the text is only given as example ("some areas include exotics such as"). This comment requests a alternatives analysis, please see Response to Comment #23-14.

Comment #27-6 (DB):

A. MND directly violates CPR 4483.

California Public Resources Code 4483 states:

b) (1) It is the intent of the Legislature that additional consideration be provided for chaparral and coastal sage scrub plant communities that are being increasinglythreatened by fire frequency in excess of their natural fire return patterns due to climate change and human-caused fires.
(2) Prescribed burning, mastication, herbicide application, mechanical thinning,or other vegetative treatments of chaparral or sage scrub shall occur only if the department finds that the activity will not cause "type conversion" away from the chaparral and coastal sage scrub currently on site.
(3) This subdivision shall be in addition to the requirements in the VegetationTreatment Program Programmatic Environmental Impact Report.

The "wood material" or "shrubs" or "brush" that is referred to throughout the MND is largely coyote brush which is a founding component of the chaparral community. Sage scrub plant communities are throughout Plots 4 and 6 and they are also to be protected from conversion to"grasslands." The MND fails to consider CPR 4483 and fails to adhere to the CPR's mandatethat killing the "brush" will not convert the habitat away from the chaparral and coastal sage scrub currently on the site.

Response to Comment #27-6: Please see Response to Comment #23-14.

Comment #27-7 (DB):

A. MND Inaccurately Claims "Historic" "Grassland" Status for Proposed Sites:

The MND states:

> *Historical analysis, including analysis of historical photos, indicates that many areas ofthe project east of the San Andreas fault were dominated by coastal prairie or oak savannah, with some areas eventually becoming shrub dominated due to the lack of disturbance such as fire.*

The Department provided the following information:

> *One of the goals of this project is to provide improved habitat for wildlife, as so much of the watershed has remained in a stagnant state. Disturbance in the landscape creates more grassland and higher light conditions, which are required by many animals and plants. Historic photos of San Mateo show an open coastal prairie, with few trees or brush.*

The MND fails to provide supporting data or the meaning behind the claim "so much of the watershed has remained in a stagnant state." The MND fails to consider that the current chaparraland sage scrub communities in the proposed site areas are thriving native plant communities that support a whole host of native wildlife. The MND fails to consider targeting non-native plants in order to further support the naturally-occurring native habitat. The MND fails to acknowledge that coyote brush, chaparral community and sage brush are desirable native habitat – instead the MND addresses these important native communities instead refer to them as "stagnant" and that "disturbance" – through burns, chain-sawing, herbicides and other mastication methodologies – will create "more grassland." The MND fails to consider that destroying native plants for more

"grassland and higher light conditions" will accelerate the expansion of invasive non-native weeds including cheat grass which is more flammable than the current native plant communities.

The MND inaccurately claims that "historic photos of San Mateo show an open coastal prairie, with few trees or brush." The MND further states, "San Andreas fault were dominated by coastalprairie or oak savannah, with some areas eventually becoming shrub dominated due to the lack of disturbance such as fire."

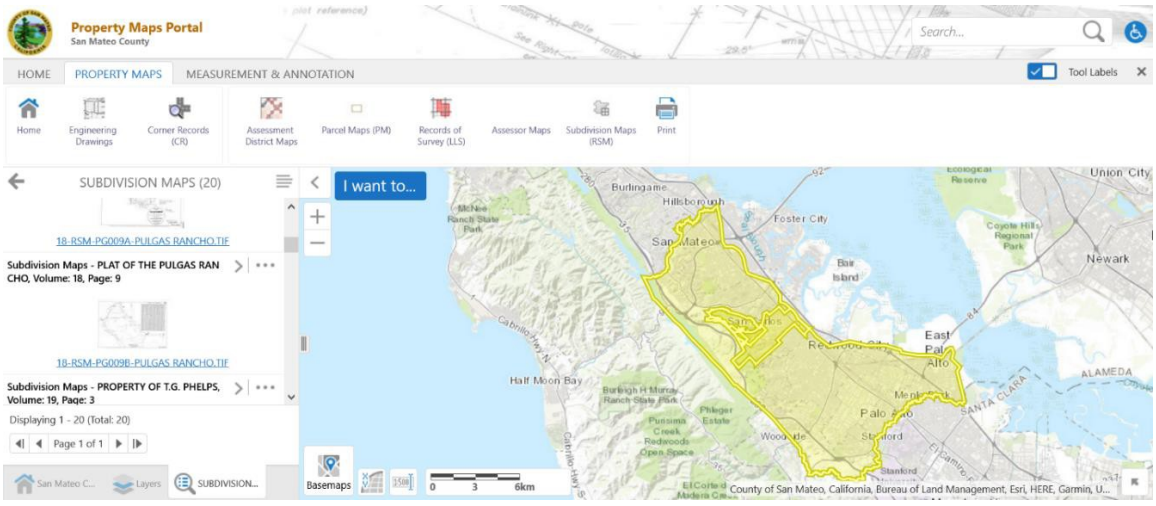
The Department held an informal public meeting on March 24, 2021 to provide local residents information about the proposed action and to answer questions. (Attachment 1) During this call the Department showed a "historic" photo of the area from the mid-1900's (approximately 1949)which depicted barren open space. This photo, and other Departmental communications with citizens, promotes the idea that the proposed sites were once "grasslands" and did not have chaparral and sage scrub communities as currently exist. (Plot 7 is the exception given it is located in the Santa Cruz Mountains).

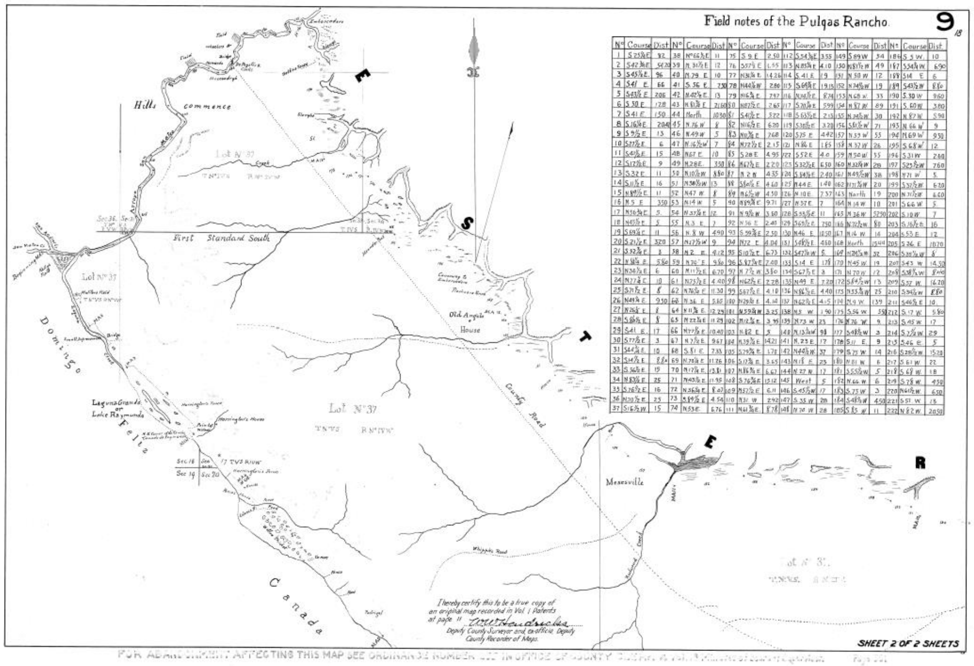
The MND fails to acknowledge the impacts that human usage has had on the proposed site locations and the human-caused destruction to native plant communities. Below are Property Maps filed with the County of San Mateo that outline that the Pulgas Rancho consumed a largeportion of the Peninsula – including Plots 3 – 7 – in the 1800's and later dairy operations occurred on the Diablo Creek Parcels in what is today Belmont Heights (see maps below).

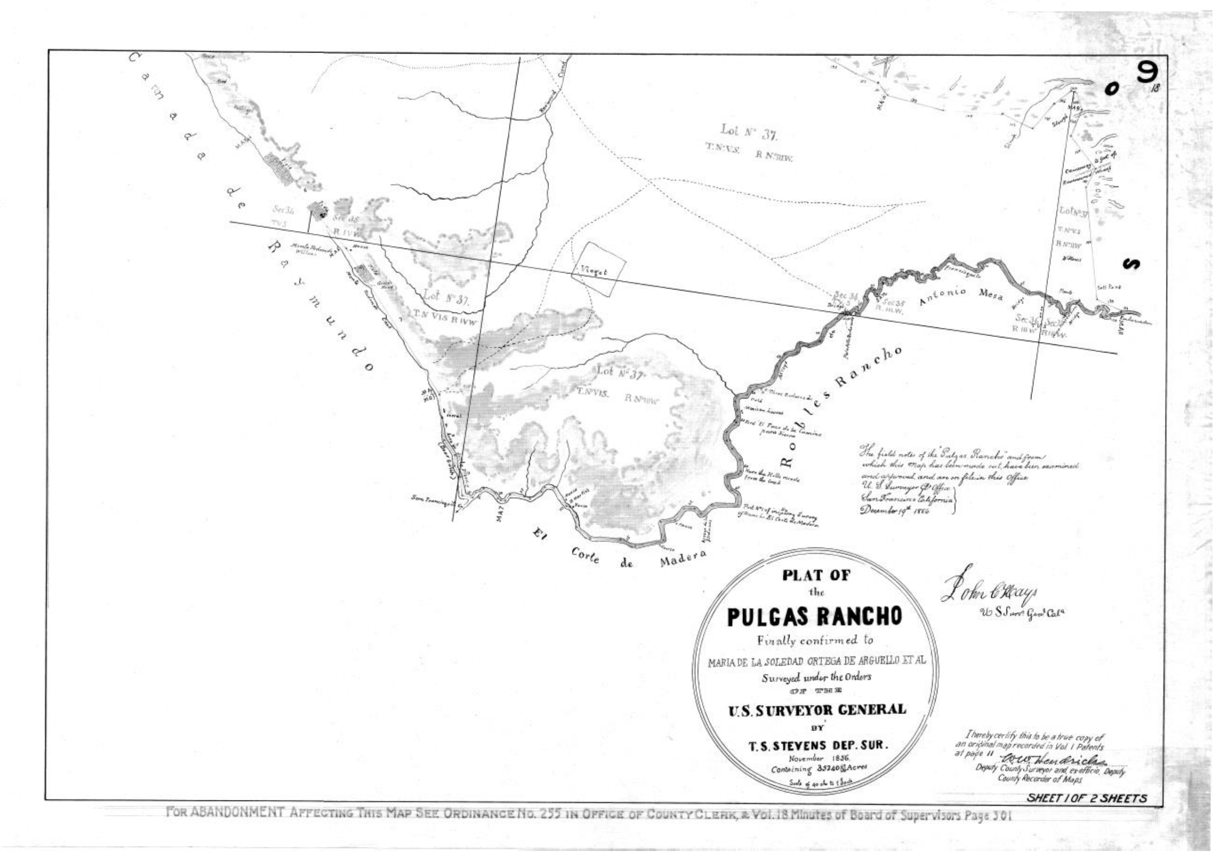
In the 1800's settlers brought cattle to the Peninsula where livestock predominated the landscape.Livestock operations during this time period are well documented as overgrazing and destroying native habitats – converting oak woodlands and other native California flora over to barren areas that were vulnerable to invasive exotic species including, but not limited to, cheatgrass. The MND fails to consider that the historic photos from the mid-20th century were of livestock destroyed native habitat – no native coastal grasslands and proposes to return the recovering landscape to the landscape that was the result of the destruction of the livestock industry.

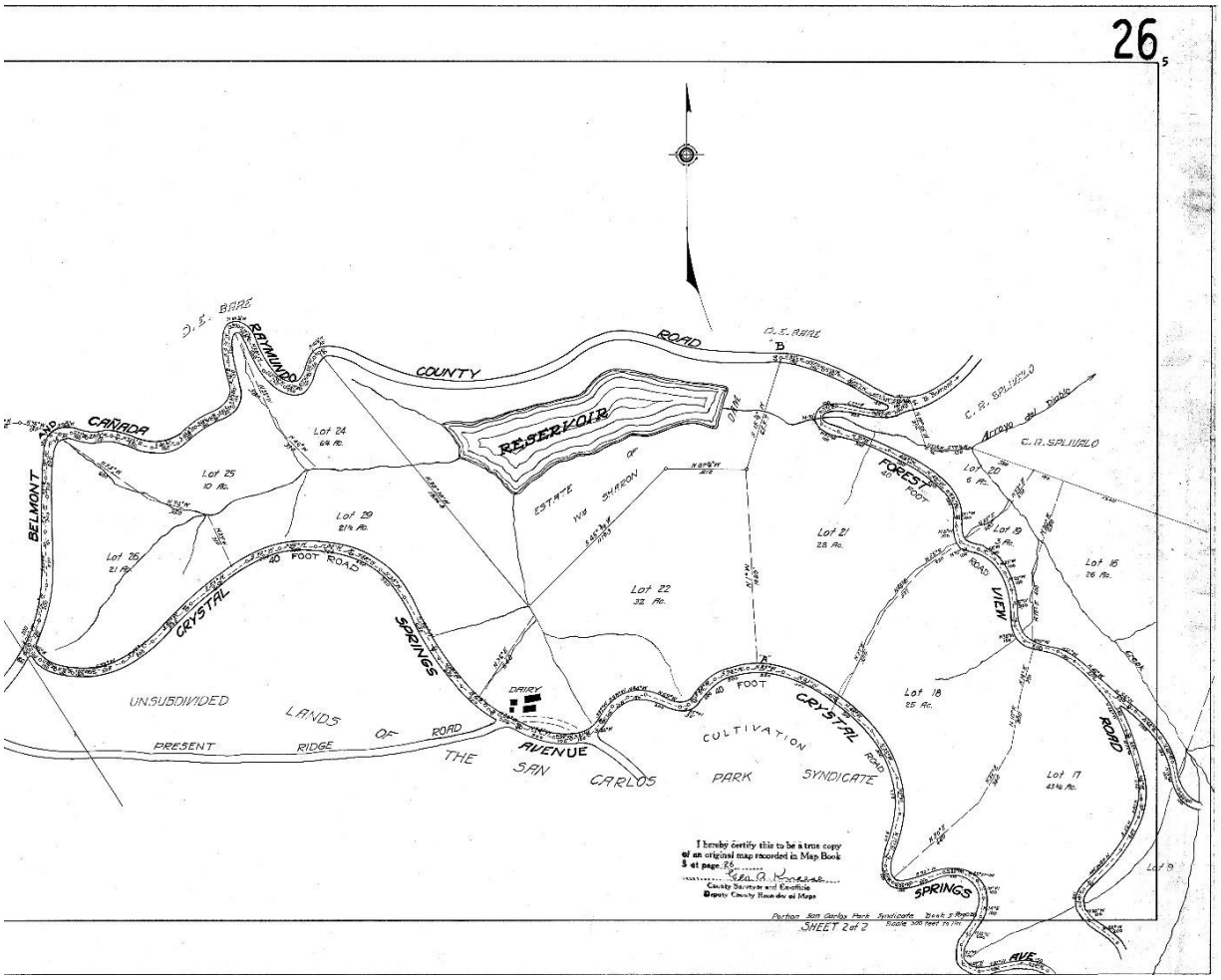
Further, historical data shows that California Indians set fires for the purpose of clearing groundto facilitate hunting and the gathering of acorns and seeds (Anderson 2005; Blackburn and Anderson 1993). Native burning was not done to benefit the native plant communities but to make gathering food and other necessities easier.

Following are (1) the Pulgas Rancho property footprint is overlapped on a current map; (2) Pulgas Rancho north; (3) Pulgas Rancho south; (4) Diablo Creek Parcel (in Belmont Heights).




Field notes of the Pulgas Rancho
9
Hills
First Standard South
Lot No 37
Old Arguello House
Mezesville
Whipple's Road
C a n a d a
I hereby certify this to be a true copy of an original map recorded in Vol 1 Patents at page 11
Deputy County Surveyor and ex-officio Deputy County Recorder of Maps
SHEET 2 OF 2 SHEETS


9
Lot No 37
Antonio Mesa
El Corte de Madera
PLAT OF
the
PULGAS RANCHO
Finally confirmed to
MARIA DE LA SOLEDAD ORTEGA DE ARGUELLO ET AL
Surveyed under the Orders
OF THE
U.S. SURVEYOR GENERAL
BY
T.S. STEVENS DEP. SUR.
November 1856.
I hereby certify this to be a true copy of an original map recorded in Vol 1 Patents at page 11
Deputy County Surveyor and ex-officio Deputy County Recorder of Maps
SHEET 1 OF 2 SHEETS
FOR ABANDONMENT AFFECTING THIS MAP SEE ORDINANCE No. 255 IN OFFICE OF COUNTY CLERK, & VOL.18 Minutes of Board of Supervisors Page 301



The above map of the Diablo Creek Parcel shows a Dairy very near to the location of my homeon Wakefield Court.

The landscape we see today is the complex result of extensive human management. Land use practices intensified over time, directly impacting the abundance and distribution of native chaparral and sage communities and oak woodlands. The MND fails to consider these importanthistorical facts and bases its desired goal on inaccurate historic information.

Response to Comment #27-7 (DB): This comment disputes CAL FIRE's claim that areas of open grassland were maintained by fire and are at risk of succession to shrub vegetation types due to fire exclusion. The commenter is of the opinion that areas of grassland where created through anthropogenic activities and did not naturally occur without human influence. There is dispute among experts with regards to the role ranching and other anthropogenic activities played in maintaining areas of open grassland in San Mateo county versus the natural fire regime. It is likely that both played a factor in maintaining grassland communities. However, that information is only conveyed in the MND to inform some background for the project area. The analysis of potential environmental impacts is not predicated on the historical composition of the vegetation communities in the project area. The environmental analysis revolves around current conditions present at the project site. Whether are not grassland was maintained by the natural fire return interval, ranching, or other factors is irrelevant with regards to the potential environmental impacts, mitigations, and their significance.

Comment #27-8 (DB):
MND Stated Goal 3: Train Cal Fire Personnel

The MND fails to provide sufficient information or rationale to support this as a goal. The MNDfails to consider alternative burning activities to train personnel such: (a) as cutting down non- native invasive trees (pines or eucalyptus) and practice

burning such tree piles; or (b) conductingsmall grass burns on invasive non-native weeds on small one-acre parcels. The MND fails to provide sufficient data or analysis to support conducting these extreme burns primarily to train personnel.

Response to Comment #27-8: Training of Cal Fire personnel is an auxiliary benefit of the project, but fuel reduction remains the primary goal and reason for the proposed project. Please see the new project description in the recirculated MND.

Comment #27-9 (DB):
MND Fails to Consider Adverse Impacts on Aesthetics

The MND fails to address that burned landscape is viewed by many, including me, to be aesthetically destructive. The Watershed has for decades been a place of beauty and home to wildlife – jackrabbits, hawks, owls, deer, bobcats, quail, mission blue butterflies, reptiles and many other native wildlife. Courts have agreed that holding that residents' opinions on aestheticscan support a fair argument for a significant impact. *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903 [lay opinion can support a fair argument].

As the public agency, it is the Department's duty to consider all evidence under the fair argumentstandard. The MND fails to consider these impacts and instead claims that impacts are not lasting
– yet we know it will take decades for the chaparral communities to re-establish to their current state. Merely because plants will regrow does not rectify the destruction that will occur throughthe proposed action and the negative impacts to the aesthetic qualities of the Watershed in Plots3, 4, 5, 6, and 8.

Response to Comment #27-9: The MND fully addresses potential impacts to aesthetics. As stated in the MND, impacts will occur to less than 5% of the watershed and will occur over no more than 1% of the watershed each year. Vegetation communities in the project area do not need to immediately recover to their current composition for impacts to be considered less than significant. This comment does not include new information which changes the analysis presented in the *Aesthetics* section of the MND.

Comment #27-10 (DB):
I. MND Fails to Consider Cumulative Impacts

The MND states:

> *As long as areas of dense shrub cover are maintained over a landscape, prescribed understory fires in oak woodland are unlikely to significantly alter dusky-footed woodratpopulations (Lee and Tietje 2005). Moreover, the intent of the proposed project is to reduce the risk of large catastrophic wildfires that would have even more severe effects on woodrats and other wildlife. Dusky-footed woodrats are common to abundant where suitable habitat occurs, and most habitat within the range of the San Francisco subspecies is protected by regional park and open space organizations (e.g., East Bay Regional Park District, Midpeninsula Regional Open Space District, Peninsula Open Space Trust, Santa Clara Valley Open Space Authority). For these reasons, and with implementation of Mitigation Measure #12, the project would have a less*
> *than significant impact on San Francisco dusky-footed woodrat.*

The MND fails to consider cumulative actions and impacts on endangered and threatened species
– including but not limited to the dusky-footed woodrat population. Locally, we have seen massive destruction of woodlands underbrush exposing woodrat nests – making them uninhabitable. Cumulatively wildlife is losing habitat at an unprecedented rate – first from natural wildfire and now from human-destruction of native habitat. The MND fails to considerthe impacts on the Dusky-footed woodrat and other threatened and endangered species (including but not limited to the Mission blue butterfly) by the massive habitat destruction, including the proposed action, which is occurring throughout the state. This is all occurring without any site-specific analysis.

Response to Comment #27-10: Please see *Mandatory Findings of Significance (b)* for analysis related to cumulative impacts.

This comment specifically address impacts to special-status animal species. The proposed project will not result in the permanent loss of habitat, unlike development projects which permanently convert wildland habitat to urban uses. Rather, this project proposes to reintroduce a naturally occurring disturbance back to the landscape. Impacts to special-status animals have been mitigated to less than significant levels (see *Biological Resources*).

Comment #27-11 (DB):

I. Conclusion

I request that the MND be revised to address reduce the scale and scope of the proposed action toaddress issues raised in this letter or an EIR is prepared to adequately analyze impacts of the proposed action and alternatives to minimize the negative impacts to the environment. The current MND has erroneous information about the lack of a school in proximity to the proposed sites and that no recreational activities occur on the proposed sites.

Response to Comment #27-11: This comment summarizes comments which have already been responded to. No additional response is needed.

Comment #28-1 (MI): As a resident of Belmont in San Mateo County, I am writing of concerns regarding the proposed burn by CAL FIRE of 385 acres in our area of Belmont Heights. I believe this to be an ill-conceived plan that instead of increasing fire protection, in fact does the opposite and increases potential for fire and will also destroy vital plant and wildlife including endangered species.

There are several important omissions in this proposal by CAL FIRE. The plan fails to mention the school (Fox Elementary School) located closely to the burn area, the 500 hundred residents whose property is adjacent to the burn area and the Cross Country Course within the burn area itself. Aside from the dangers of a change in the wind during a burn, there is also the impact of lingering smoke left in the air following the burn.

Response to Comment #28-1: The Fox Elementary School and Cross County Course have been addressed in the revised MND. Impacts of lingering smoke are discussed in the *Air Quality* section.

Comment #28-2 (MI): Supposedly, the purpose of the burn is for fire safety. However the report states that existing mowing and the firebreak are adequate fire prevention. So why should there be a burn at all?

Response to Comment #28-2: Please see Response to Comment #23-18.

Comment #28-3 (MI): Moreover, there is significant evidence that shows grass to be more flammable than the native chaparral. Burning would also allow more of the invasive species to take hold and those grasses would grow again every year. Now CAL FIRE would need to come back year after year to keep burning. Is that the plan?

Response to Comment #28-3: Please see Response to Comment #23-23 and Response to Comment #23-2. Burning would not occur see the updated project description in the revised MND for information regarding the time frame in which units may be burned again, if it is done at all.

Comment #28-4 (MI): Obviously, the burn would kill wildlife. This would include woodrats which are vital to the ecosystem and species of plants (i.e. Lupine) on which the endangered Blue Butterfly is dependent. These would be significant losses affecting the sustainability of our woodlands and further the extinction of already endangered species.

Response to Comment #28-4: Please see the *Biological Resources* section for analysis of the potential biological resource impacts and mitigation measure which protect special status species.

Comment #28-5 (MI): Altogether, there are numerous errors and omissions in this plan. It would appear, in fact, that the real reason for this proposal is to give trainees an opportunity to burn something. Adding insult to injury, the plan does not even

require that residents along the property line be given direct notification of burn days.

I am requesting that a much more detailed and inclusive MND proposal be considered and rewritten before taking action on this plan which I believe is unnecessary, dangerous and has not been well thought out.

Response to Comment #28-5: Please see the recirculated MND.

Comment #29-1 (GD): The Sierra Club Loma Prieta Chapter (San Mateo, Santa Clara and San Benito Counties) has a long and focused interest in protecting the unique environment of theSan Francisco Public Utilities Commission's Crystal Springs Watershed.

We do have several reservations about the "Prescribed Burn Project" being analyzed as a Mitigated Negative Declaration (MND) and we write to ask that an EnvironmentalImpact Report (EIR) be conducted instead, in which the 1969 Scenic Easement (attached) - as signed by the State of California, City and County of San Francisco, San Francisco Public Utilities Commission, County of San Mateo, and the United States Department of the Interior - be recognized as a controlling document. Our then attorney, Sidney Liebes, acting also on behalf of the Committee for Green Foothills, played a significant role in bringing this Easement (see attached) to fruition and we are committed to ensuring its relevance. Please note the easement says, “Except as required to accomplish the purposes and uses herein permitted to Grantorthere shall be no cutting or permitting of cutting, destroying or removing any timber orbrush without the concurrence in writing by a regional representative of the Department of the Interior to be designated by the Secretary of the Interior.”

Response to Comment #29-1: The proposed prescribed burns are in the federal scenic and scenic/recreation easements. The purposes and uses reserved to the SFPUC as the fee owner in the “(e)xcept as required to accomplish the purposes and uses herein permitted to Grantor” reference include managing vegetation to minimize wildfire risk. The SFPUC regularly conducts mowing, tree removal, fuel break management, fuel load reduction, non-native plant removal, and prescribed burn projects on the Peninsula Watershed which are not subject to the federal concurrence language in these easements.

Comment #29-2 (DB): An Environmental Impact Report would examine alternatives - one of which could be the usage of goat grazing rather than controlled burns. Goats are a proven technique for reducing fire on landscapes, so much so that goat thefts are up statewide. They also reseed and declump the area when they excrete. Half Moon Bay has adopted goat grazing for sensitive areas and their process has been sophisticated to avoid consumption of indicator species. Goats are an alternative that aren't analyzed in this Mitigated Negative Declaration.

We take issue with a number of claims of mitigating fire risks for high density human population based on controlled burns from a cursory reading of the current fire situation in California. These issues can be resolved with a full EIR that also informs policy makers of the best alternatives available. The MND says that this particular controlled burn is a way of preventing fire for the communities east of the SFPUC lands for Crystal Springs. There are a number of problems with the claim.

Response to Comment #29-2: Please see Response to Comment #23-26 and #23-43.

Comment #29-3 (GD): First, the main cause of fires at the Wildlands Urban Interface is not the remaining undisturbed landscape but the intrusion of human infrastructure primarily roads and power lines into the landscape as the LA Times and other publication have reported a number of times. The reason firefighting resources are committed is not to save the landscape from the fire but to save the intruded human lives from the fire. The solutionis to eliminate these intrusions by not developing further at the interface, reducing presence at the interface, removing roads and power lines, hardening remaining human structures that cannot be removed, ensuring feasible evacuation routes, and implementing defensive spaces against fires. None of these real solutions are being implemented, planned for funding, developed for feasibility, or mentioned in the MND. Controlled burns need to part of comprehensive policy to expanding disaster within the new normal, not an isolated policy matchstick in the unrecognized tinder.

The MND says that "Burn Units were chosen adjacent to roads, trails and existing disklines to limit the amount of control line

that must be constructed." Human infrastructuresuch as roads and power lines are a leading cause of fires. The MND doesn't state how the controlled burns will help or increase risk in the area. What the statement implies is that the worsening fire situation in California is to be addressed by a business-as-usual response from CDF.

Response to Comment #29-3: A comprehensive fire resiliency program and policy is outside of the scope of this project. CAL FIRE agrees that prescribed burning only part of solution to the wildfire resiliency; please the California's Wildfire and Forest Resilience Action Plan found here: https://www.fire.ca.gov/media/ps4p2vck/californiawildfireandforestresilienceactionplan.pdf.

Comment #29-4 (GD): Second, the process of fires in California has changed with the changing climate. Today we get largely wind driven fires in California. In this particular landscape high winds are common on a summer evening. Wind caused fires such as the Camp Fire have jumped barriers like controlled burns; other deadly California fires have recentlyjumped freeway barriers to torch adjacent communities. Why that wouldn't happen in this windy corridor is not explained in the MND, though the impact of wind on the controlled burn is mentioned. This particular controlled burn needs to say how it will prevent fire for the communities east of the SFPUC lands for Crystal Springs from thehigh winds common in the area.

Response to Comment #29-4: Please see Response to Comment #10, particularly section #2 which discusses wind patterns.

Comment #29-5 (GD):
Third, nitrogen deposition from burning fossil fuels in internal combustion engines onHWy280 are the primary cause of tall invasive grasses on serpentine soils in this particular landscape. They have shaded out native grasses and food sources extirpating species like the checkerspot butterfly. The solution is to remove nitrogen deposition from the landscape to control flammable grasses. At Edgewood Park in

Redwood City this is done by penned in goats and volunteers for the Native Plant Society. Making Highway 280 an electric vehicle only highway in these serpentine soilstretches would solve the invasive grass growth from exhaust nitrogen. The result would be that native plant species that make up the diet and habitat of the red legged frog, garter snake, dusty footed rat, nesting blue birds and raptors would be also improved.

Response to Comment #29-5: Specifying Hwy 280 as an electric vehicle only highway is outside the scope of this project and furthermore is outside of CAL FIRE's jurisdiction.

Comment #29-6: These lands - as written in the MND - "are some of the last remaining wildlands in SanMateo County". Elsewhere it's called a "biodiversity hotspot." Yet there is no indicationhow the controlled burn will support maintaining the wildlands status of these lands. If anything, the "pretreated by herbicide application and/or by cutting with chainsaws" and "Dozer lines are created by utilizing a bulldozer to remove all vegetation along theline, only allowing bare mineral soil to remain" further degrades the wildlands to desertified anthropocene landscapes. Increased human presence in once upon a timewildlands is a recognized cause of wildfires.

Instead, the landscape is tending toward desertification - a problem that humans haveworsened on the American landscape over the last 300 years. The MND states "Repeated short fire return intervals (<10 years) deplete the seedbank of these species without allowing them to grow to maturity where they can reproduce and replenish the seedbank. Over time, repeated short fire return intervals may result in extirpation of these obligate seeder shrub species if they occur in the project area." There is no indication how extirpation will be avoided for both the plants identified and the species that feed on them. Decreasing biodiversity in landscapes is a credible cause of wildfire intensity.

Response to Comment #29-6: Please see Response to Comment #23-51.

Comment #29-7 (GD): Controlled burns are being introduced when these species are in decline across this iconic landscape.

The checkerspot butterfly for example has been extirpated in recent years in this area. Fire adds to already wobbly populations and could push the speciesinto irreversible decline. If fire is regularly introduced to the landscape the deterioratednative plant population will be extirpated over the years. Species population maintenance or revival and their impact on reducing fire on a landscape is not addressed in the MND. Neither are invasive grasses. The MND does address relocating threatened species when encountered. Reducing biodiversity leads to increase desertification and dryer conditions that attracts fire.

The MND discusses endangered species such as the red legged frog and San Francisco garter snake but doesn't say how their resident population will be aided by the controlled burns. Larger species such as the grey fox and California cougar and the deer that are its primary diet aren't mentioned. The MND does not discuss the present decline in these species and how the continued decline will be aided or benefited from the controlled burn. Instead, the MND offers a hypothetical statement "By returning fire to the landscape, this project may also positively impact organisms that are adapted to fire". There is no evidence supplied here to gauge the value of thisstatement though history unfortunately would lead us imply otherwise.

Sierra Club says we need to restore native grasslands, wetlands, and forests to remove carbon from the atmosphere. We also claim that controlled burns have theirplace in an ecology where the hydrologic cycle maintains the fog belt and the permeability of the living soil on Peninsula hillside both of which are currently severely compromised along with the biodiversity of the landscape. Further desertification we claim expands the problem. Controlled burns cannot be looked as one tool solution to the many facets of fire from the deteriorating climate.

Response to Comment #29-7: The project has mitigated impacts to special status species to a less than significant level. While CAL FIRE expects most species will benefit from the reintroduction to the landscape, it is not the primary goal of the project which is fuel reduction and wildfire resiliency. CEQA does not require that projects benefit or improve habitat for all plant and animal species.

Comment #29-8(GD): To summarize, the result of these burns will be to extirpate native species while allowing invasive fire-spreading-grasses to proliferate because of the unaddressed nitrogen deposition, from HWY 280, thus increasing risk in the corridor. These controlled burns do not address the issue of risk mitigation for homeowners east of theSFPUC property because wind driven fires in CA have jumped man made barriers and burned home that haven't been hardened or located within defensible spaces.

After considering the questions raised by the MND the prospect of wildfires does not appear to be diminished. In particular this controlled burn threatens the uniqueness ofa view shed that is controlled by the 1969 Scenic Easement attached. An EIR recognizing the Scenic Easement would help answer these questions and concerns. Please undertake one.

Response to Comment #29-8: This comment serves as a summary of the comment letter. Please see responses to comments above.

Comment #30-1 (SFF): PLEASE CONSIDER THE FOLLOWING CHANGES TO THE MND TO PROTECT FEDERALLY ENDANGERED MISSION BUE BUTTERFLY HABITAT ON THE CRYSTAL SPRINGS WATERSHED

Page 25

Mitigation Measure #6: Survey for and Avoid Occupied Mission Blue Butterfly Host Plants.

If host plant locations are documented inside proposed burn areas, they will either be avoided or surveyed. For locations that are avoided no project activities shall occur within 25 feet of the outer perimeter of the host plants. For locations that are surveyed these locations will be thoroughly surveyed once every two weeks for the presence of Mission blue butterfly eggs and larvae (including evidence of larval feeding) March thru June. Surveys shall be conducted by qualified biologists with demonstrated field experience identifying all MBB life stages. If no eggs or larvae are found at a given host plant location, the location shall be considered unoccupied for that year and project activities may commence in the fall without implementing avoidance measures. All unoccupied locations must be resurveyed for Mission blue butterfly eggs and larvae in subsequent

burn years (i.e., the "unoccupied" status is only valid for the year in which the survey is conducted). Host plant locations at which eggs and/or larvae are found shall be considered occupied for that year and no project activities shall occur within 25 feet of the outer perimeter of the location. This distance is expected to be large enough to protect larvae because second instar larvae diapause in leaf litter at the base of larval food plants and last instar larvae pupate on or near the base of food plants (USFWS 2010).

25 feet – Mission Blue Butterflies

For locations that are avoided no project activities shall occur within 25 feet of the outer perimeter of the host plants.

Comment: For locations that are avoided no project activities shall occur within 50 feet of the outer perimeter of the host plants.

Mission Blue Butterflies are not good fliers and typically disperse an average of 150-167 meters of their lupine patch. Many of these Mission Blue sites are on the edge of open grassland and the nectar plants are typically on the inside of those grasslands. They need to find resting areas and nectar plants close by to feed during their short life. Scarcity of forage and refugia post-burn can stress an already depleted, endangered population. A 12-ft control line would likely be within that the grassland area and bulldoze or hand clear down to mineral soil. This would create a barren edge within 25-ft of lupines and then a large patch of burnt earth; this could force next years' butterflies to forage farther than would have occurred had a 50-ft buffer been implemented. A prescribed burn within 25 feet will impact nectar plants for the following year; it may create a flush of forbs or it may not especially if it is a drought year. Leaving a 50-foot buffer would leave a greater chance of some nectar plants surviving to the next flight season.

Response to Comment #30-1: This comment claims that Mission blue butterflies (MBB) are poor fliers and unable to fly long distances to find new host plants. The commenter provides no citations for this claim. Recent publications, including the 2019 amended recovery plan for MBB produced by the United States Fish and Wildlife Service (USFWS) dispute the notion that MBB are poor fliers and cite common dispersal distances of up to 500 meters, with dispersal distances of up to 2,500 meters observed (USFWS 2019 p. 3[6], MacDonald et al 2012 p. 45[7]). Still, Mitigation Measure #6 has been updated in the recirculated MND to allow a qualified biologist discretion when determining buffers for occupied host plants. The buffer is still required to be at least 25-feet, however it may be expanded as necessary in order to protect nectar plants nears occupied larval host plants as determined by the qualified biologist.

Comment #30-2 (SFF):

For locations that are surveyed these locations will be thoroughly surveyed once every two weeks for the presence of Mission blue butterfly eggs and larvae (including evidence of larval feeding) March thru June.

Comment: All host plant locations equal to or greater than five host plants and less than 550 feet from other host plant locations will be avoided.

The National Parks Conservancy built their own burn boxes to test the effect of fire on Mission Blue lupines and found that burning did not result in increased lupine recruitment.

Two points from a recent study on Mission Blue habitat

Even small number of host plant occurrences aid in preventing extinction in metapopulations. In a study model that eliminated all small patches of host plants (<15 host plants), the survival rate for Mission Blue butterflies went down to 40% in

[6] U.S. Fish and Wildlife Service 2019. Recovery Plan for the San Bruno Elfin Butterfly (*Callophyrs mossii bayensis*) and Mission Blue Butterfly (*Icaricia icarioides missionensis*).

[7] Macdonald, B., Longcore, T., and Weiss, S. 2012. Status and Variability of Mission Blue Butterfly Populations at Milagra Ridge, Marin Headlands, and Oakwood Valley.

that scenario.

1) Overall average patch occupancy is 40% and is even lower in small patches. Checking small patches of host plants even at this frequency for Mission Blue occupancy can give false negative results. In the study area the largest patch was 828 lupine plants. This patch is far greater than any of the Peninsula Watershed patches, making even the 5+ lupine plant patches more critical to Mission blue butterfly continued long-term survival.

Response to Comment #30-2: Contrary to what is presented in the comment, The National Parks Conservancy did find in their limited study that the burn box treatment resulted in increased lupine density when compared to pre-treatment conditions (Olson et al n.d.[8]). They did also find that lupine density increased in both the mechanical disturbance plots and in the control plots. However, this study focused on silver lupine (*Lupinus albrifrons*) and manycolored lupine (*Lupinus variicolor*), which are not the common host plant present on the SFPUC watershed. Summer lupine (*Lupinus formosus*) is the host plant for nearly all occupied sites in the SFPUC watershed and may have a different response to fire than silver lupine and many colored lupine. This comment also includes two points derived from a "recent study" on Mission blue butterfly habitat. However, the comment does not include the name, authors, or a link to the study so it is difficult for CAL FIRE to respond appropriately. This comment does specify a false negative rate associated with low patch occupancy. For this project, all host plants which are to be included in the burn unit will be surveyed for Mission blue butterfly larva. No sub-sampling of a patch will occur. Therefore, it is irrelevant what the patch occupancy rate is with regards to false negatives, as every plant in a patch will be surveyed for larva or larval feeding damage and false negatives will be avoided. Still, Mitigation Measure #6 has been updated in the recirculated MND to allow a qualified biologist discretion when determining whether unoccupied host plants need to be excluded from the burn if they are considered important dispersal habitat for MBB.

Comment #31-1 (MC): I am adamantly against the CAL FIRE plan to burn 385 acres next to Belmont Heights in Belmont (SITES 4 and 6), part of the proposed SFPUC prescribed burn project in San Mateo County.
For the following reasons, please abandon your plan for SITES 4 and 6:

You have neglected to address the fact that there is a large area of residential homes nearby SITES 4 AND 6, including many homes that are actually adjacent to these sites.

Response to Comment #31-1: This is precisely the reason these sites where chosen, to reduce fuel loading adjacent to the houses and provide protection from an uncontrolled wildfire. The adjacency of houses was not ignored.

Comment #31-2 (MC): You have not indicated how and when you will inform these residents of your proposal. They need to know at least 2 or 3 days in advance so that they can prepare for and/ or evacuate the area in order to avoid effects of harmful air pollution and possible fires that might burn their homes down!

Response to Comment #31-2: The public will be informed through a combination of press releases, social media, and notifications posted at the project site. These notifications will be made as early as possible and will occur at least three days in advance of the proposed burn. CAL FIRE intends to give as much notice as possible, given that the exact date of the burn will be dependent on weather conditions. The prescribed burn will be implemented under controlled conditions with fire suppression resources located on site – there will be no risk to homes adjacent to the prescribed burn.

Comment #31-3 (MC): SITE 4 is adjacent to an elementary school with over 300 hundreds students and you have not informed the school district of this proposal, nor addressed the health concerns of these children of these proposed repeated burns and possible need for evacuations as well.

Response to Comment #31-3: Information on Fox Elementary has been added to the MND. The prescribed burn will only be

[8] Olson, J., Crooker, C., Forrestel, A., and Rehlaender, W. (n.d.). Golden Gate National Parks Conservancy and the National Park Service. Use of Experimental Disturbance Treatments to Improve Habitat for an Endangered Butterfly.

conducted during favorable conditions and not when smoke would impact the school. There will be no need for evacuations.

Comment #31-4 (MC): Your plan included the possibility of using herbicides to kill vegetation prior to burning. I believe that herbicides are dangerous to our health and the possible burning of these herbicides will likely create even more dangerous air pollution.

Response to Comment #31-4: Herbicides will be used sparingly and use will be consistent with recommendations of a licensed Pest Control Advisor (PCA) and will comply with all appropriate laws and regulations as governed by the Environmental Protection Agency (EPA), Department of Pesticide Regulation (DPR), and the County of San Mateo. There is no evidence presented in this comment to support the opinion that burning of herbicide treated areas will impact public health. In fact, studies conducted by the United States Forest Service have found that burning of areas treated with herbicide do not pose a risk to public health (Bush et al 2000[9]).

Comment #31-5 (MC): These sites include many non native plants, including Eucalyptus trees that are highly flammable. We saw in the Oakland fire (1991) that Eucalyptus trees were the major source of flying embers that landed on nearby houses and caused the largest dollar fire loss in United States history. How will you prevent these trees from catching fire during your prescribed burns?

Response to Comment #31-5: Areas of Eucalyptus will be pre-treated before the prescribed burn to reduce fuel loading in the understory and remove ladder fuels which could potentially carry fire into the canopy. The burn will take place when conditions will allow for a low intensity understory burn, and the appropriate fire suppression resources will be on-site.

Comment #31-6 (MC):
Rather than use dangerous, possibly uncontrollable burns to create a fire break, you should mechanically remove (i.e. cut down) all of the Eucalyptus and other non native plants. Then continue the existing plowing plan on these sites which have been effective firebreaks for many years

Response to Comment #31-6:
Unfortunately, the wildfire environment has changed drastically over the past decades and what was effective in the past may no longer be enough. The 7 largest wildfires in California history have all occurred in the last 4 years. 17 of the 20 largest wildfires in California history occurred in the 21st century. Practices employed in the past must be updated to tackle the current threat.

Comment #31-7 (MC): Having lived in this area for over 30 years, I know that weather conditions can shift quickly. Our area is often very windy. How will you extinguish your prescribed burn if the wind conditions change rapidly as it often does. I am extremely concerned that embers will be flying and land on my home.

For these reasons, I urge you to abandon SITES 4 and 6 from your proposed project and find a more suitable area far away from residential areas and schools.

Response to Comment #31-7: CAL FIRE collaborates with the National Weather Service (NWS) during prescribed burns in order to obtain the most accurate weather forecast possible for the project area on the day of the burn. The burn will only be conducted during favorable weather conditions with appropriate winds. If the weather shift unexpectedly, the burn will be terminated by the suppression resources that are on scene. The prescribed burn will not be conducted when there is any risk of embers igniting homes.

[9] Bush, P., Neary, D., and McMahon, C. 2000. Fire and Pesticides: A Review of Air Quality Considerations.

Comment #32-1 (JN): I am writing to express concerns about planned Spring vegetation burning near Belmont Heights homes here in San Mateo County. A neighborhood association meeting pointed out a lack of communication with residents in addition to errors, omissions and assumptions in the proposed plan. We were given to understand that:

- The project description does not set any limit on the number of acres in a single burn. Buried under another topic is the mention *"we aim to burn approximately 200 acres a year"* but this is not binding since it is not included in the Project Description.
- The plan fails to mention Fox School, the Cross Country Course (an estimated 30,000 users per year) and 500 residences within ¼ mile of the sites. Air quality impacts during and lingering after the burn are thus dismissed. As a family with asthma issues, we are left to wonder if health concerns have been adequately addressed since there has been little notification.
- Though the report states that the burn's purpose is to limit the spread of wildfire, it indicates that existing mowing and roads are adequate fire breaks.
- The plan is to replace native chaparral with grass, which is proven to be more flammable. More flammable grass will regrow within the year.
- Residents—even those sharing a property line—will NOT receive direct notification of the burn day(s).

Response to Comment #32-1:

- The project description in the recirculated MND has been updated clarify that no more than 200 acres will be burned in a single year.
- Information on Fox Elementary has been added to the MND. The prescribed burn location was chosen in order to protect the homes from uncontrolled wildfire. The analysis specifically mentions homes adjacent to the burn units. The prescribed burn will not be conducted when wind conditions will blow smoke straight into the neighborhood, and public notification of a burn day will be made as far in advance as possible (at least 3 days).
- The existing mow lines and roads may be inadequate for uncontrolled wildfire. They will be adequate for the prescribed burn conducted during the appropriate weather conditions with fire suppression resources already on site.
- The purpose of the proposed project is not to reduce flammability (i.e. the ability to ignite), but rather to reduce intensity of a wildland fire and increase firefighters ability to quickly control and contain a fire. Chaparral will readily ignite during the summer and fall before winter rains when fire danger is at its highest.
- CAL FIRE will notify residents though press releases, social media, and posting on-site ideally a week in advance, and at the very least 3 days before implementation of the prescribed burn.

Comment #32-2 (JN): Thus I am adding my voice to my neighbors' in requesting a more thoughtful plan to include these changes:

- Reissue the MND with CORRECT AND COMPLETE information, including air-quality protection for Fox School, the Cross Country Course, and hundreds of adjacent homes.
- In the Project Plan, COMMIT to burning no more than 10 acres of Site 6 (Cross Country Course) per year—equivalent to 7.5 football fields or 40 home lots.
- DELETE the objective of converting shrub to more-flammable grassland, and provide a controlled, enforceable program to ensure the return of chaparral and native plants instead of more invasive species.
- Establish an E-MAIL NOTIFICATION list for residents to receive notice 24 hours before scheduled burn days.

Response to Comment #32-2:

- The MND has been recirculated to include more information of the Fox School and Cross-Country course. The Air Quality analysis regarding significance of impacts is still valid.
- In order to implement fuel treatments in a timely manner, 10-acre limit per year is not feasible. This would take at the very least 20 years to implement only one burn unit.
- Please see Response to Comment #23-14 and Response to Comment #23-2 regarding type conversion and invasive plant treatments.

- CAL FIRE will notify residents though press releases, social media, and posting on-site ideally a week in advance, and at the very least 3 days before implementation of the prescribed burn.

Comment #33-1 (BR): I am writing to express concern about the prescribed burn process apparently planned for the area that contains the Crystal Springs Cross Country Course, a significant recreational facility within "Burn Plot #6" in the *Initial Study - Mitigated Negative Declaration* dated February 16, 2021.

Fire Protection Background

To share my background, I was employed by Cal Fire many years ago as a Foreman in charge of a "Range Improvement" crew that specialized in backfires on large forest fires and in controlled burns in several Northern and Central California counties. As a former fire professional, I appreciate the need for fire protection and support the mission of Cal Fire to protect our communities.

Crystal Springs Cross Country Course

After my Cal Fire career, as Head Coach of Cross Country and Track teams at College of San Mateo (CSM), I designed and built Crystal Springs Cross Country Course. The Course has been operated continuously by CSM for 50 years under a permit from the San Francisco Public Utilities Commission. I have personally maintained the Course and managed nearly all competitive events throughout its history.

The Course has a rich 50-year history in which hundreds of thousands of high school, college and middle school athletes have competed and created memories. The carefully designed 3-mile course is known for its rigor, safety, and scenic beauty, a combination that is unmatched in Northern California. Each year it hosts over two dozen large competitions, including championship events for around ten leagues (totalling roughly a hundred schools) and a few other events that have become traditions for local athletic programs. Over these 50 years, most high school cross country athletes between San Francisco and Monterey have competed on the Course. The Course even hosted the 1974 National Cross Country Championship.

In addition to hosting formal competitions, the course is used for running and hiking by dozens and sometimes hundreds of people virtually every day.

Response to Comment #32-1: This comment summarizes the commenters background and provides a brief history of the cross-country course. No response is needed.

Comment #32-2 (BR):
Recreational Resource to be Protected

The Course is a valuable and frequently used recreational facility that should be protected. Burning the Course would diminish its aesthetic appeal and the experience of young athletes that compete there. In addition, the Course area contains two structures and numerous markers used for events, all of which could be destroyed by fire. The Course is not an unused open space and it should not be burned in the manner that an unused open space might be burned.

As a former Cal Fire professional, I also value fire prevention and I understand the prescribed burn process. I don't dispute that fire protection, perhaps including some prescribed burning in areas near the course, may be appropriate. However, I am also very familiar with the terrain and believe that sufficient protection can be achieved through measures that do not include extensive burning.

Response to Comment #32-2: CAL FIRE recognizes that immediately after burning, the aesthetic appeal of the course will be temporarily diminished. However, following the onset of winter rains, plants will germinate and the area around the course

will be green with new growth. The project will not result in permanent impacts which alter the aesthetics of the course appreciably, and most of the viewshed present from the course will remain unburnt. The structures will be protected from the prescribed fire and retained. Markers will be protected to the greatest extent possible. CAL FIRE will leave the cross-country course in a fully usable state following completion of the burn.

Comment #32-3 (BR):
Suggestions

I suggest the following steps to improve fire safety and protect this valuable recreational resource:

- Establish a fire break southwest of the course to mitigate risks presented by fires originating on ornear Highway 280. This could involve prescribed burning between the freeway and up to points near the Course.

- Remove, as needed, dead vegetation within the Course area through means other than burning.

- Continue to maintain the fire break on the northeast edge that already provides distance for background the neighborhood homes and accessibility for fire equipment.

Response to Comment #32-3: CAL FIRE thanks you for the suggestion. We put significant thought and planning in the burn units as delineated in the MND, and due to the cross-country courses proximately to homes, we have determined that it needs to be included in the burn area.

Comment #33-4 (BR): My hope is that you will recognize that this area is different from largely unused nearby open spaces. TheCourse is a valuable recreational resource that would be degraded by a large scale prescribed burn.

I invite you to personally visit the Course to enable more precise and informed planning. I would be pleased to show you around the Course at your convenience. Please contact me by phone or email if you would like to do this, or if you have any questions. I would appreciate an opportunity to hear your thoughts on the information presented above and to exchange ideas on how to control fire risk while also protecting this unique community resource.

Response to Comment #33-4: We thank you for the invitation, but our staff has already made multiple visits to the cross-country course during the planning phases of this project.

Copies of Comment Letters

With Comment Number Identified

San Francisco
Water Power Sewer
Operator of the Hetch Hetchy Regional Water System

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Natural Resources and Lands Management Division

April 5, 2021

Sarah Collamer
Vegetation Management Plan Coordinator, Forester I
California Department of Forestry and Fire Protection
CZU Resource Management
6059 Highway 9
Felton, CA 95018
Phone (831) 335-6792

Via Email to: sacramentopubliccomment@fire.ca.gov

Re: Proposed SFPUC Prescribed Burn Project Initial Study-Mitigated Negative Declaration

Dear Sarah,

We are writing to provide our comments, extend our support, and thank CALFIRE for its efforts related to the Prescribed Burn Project on the San Francisco Public Utilities Commission's (SFPUC) Peninsula Watershed. The Peninsula Watershed is part of our Hetch Hetchy Regional Water System and collects and stores high quality drinking water for our 2.7 million customers. The Peninsula Watershed is also an important ecological resource for the Bay Area, and we recognize the significance of our role as environmental stewards of its native plants and animals. We are also committed to and invest in the protection of surrounding communities and watershed resources from wildfires.

#1-1

The Peninsula Watershed is a Hazardous Fire Area and State Responsibility Area (SRA) with CALFIRE as the legally responsible agency for providing fire protection. The SFPUC supports vegetation management efforts by CALFIRE to protect resources, enhance areas for fire suppression, and improve evacuation routes for the Peninsula Watershed's wildland urban interfaces.

We appreciate the collaboration with CALFIRE as it prepared this Initial Study-Mitigated Negative Declaration, which was made available for public comment on February 18, 2021. This document is the result of almost 20 years of work together with CALFIRE, and will increase our collective ability to conduct fuel load reduction projects to minimize the risk of catastrophic wildfire and protect surrounding communities, drinking water quality, and the ecological resources within the watershed. We support the project objectives, and implementation will create another opportunity for SFPUC staff to train alongside CALFIRE, as we do now when conditions allow for prescribed burns on the San Andreas and Pilarcitos Dams.

In response to interest from local communities, CALFIRE hosted a virtual information meeting on March 24, 2021 and provided an overview of the project and answered questions. In response to these questions, we understand that CALFIRE now plans to revise and republish the document for an additional 20-day public comment period to provide additional detail and clarify the process that must be completed before the project can be implemented.

We appreciate this effort and believe that providing this additional information and time will allow for greater understanding of the project and its benefits to local communities and to the watershed. We are also grateful for the clarification CALFIRE has provided to assure local communities that this project will not disrupt the ongoing use of the cross country course operated by the San Mateo Community College District.

Given the public transportation corridors through the watershed, we anticipate that wildfires will continue to be unintentionally started in the watershed, and that this project and other vegetation management actions will reduce the risk of these small fires from becoming larger and catastrophic. This was our experience with the August 2020 lightning strikes on the watershed, and thanks to the quick support from CALFIRE and local fire departments responding these small fires were all quickly extinguished.

Prescribed fire is a vegetation management tool that requires a predefined set of conditions (prescription) to achieve ideal fire behavior and meet the project objectives. We will work closely with CALFIRE to define the specific project objectives within each burn unit. CALFIRE as the lead agency will write the prescription for each burn unit to meet the defined objectives and take responsibility to ensure that fuel moisture, ambient temperature, smoke dispersal, wind speed and direction, and relative humidity are all within the prescription written into the burn plan and that conditions are appropriate for each burn.

#1-1

The SFPUC will complete all pre-burn environmental surveys and post burn vegetation monitoring. The SFPUC will work with CALFIRE to provide public notifications to adjacent affected communities and jurisdictions and SFPUC wholesale costumers prior to the implementation of a burn. SFPUC will provide staff, water support and equipment to assist the day of each burn.

#1-2

We support CALFIRE continuing to use prescribed fire as a tool for vegetation management and fuel reduction to enhance wildfire response and provide safe evacuation routes on the Peninsula Watershed. The proposed SFPUC prescribed burn project has been thoroughly reviewed by the SFPUC staff and we look forward to working with CALFIRE on its implementation.

#1-3

Sincerely,

Tim Ramirez
Division Manager

Cc: SFPUC Commissioners

CITY OF **BELMONT**

C/O One Twin Pines Lane, Suite 310, Belmont, CA 94002
Community Development Department
(650) 595-7417 • Fax (650) 637-2982
www.belmont.gov

April 2, 2021

Sent Via Email
SacramentoPublicComment@fire.ca.gov

RE: **City of Belmont Comments**
Initial Study/Mitigated Negative Declaration (IS/MND)
SFPUC Prescribed Burn Project, San Mateo County

The City of Belmont appreciates the opportunity to provide comments on Initial Study/Mitigated Negative Declaration (IS/MND) for the SFPUC Prescribed Burn Project in San Mateo County.

Specific Expertise of the City of Belmont

CEQA Guidelines section 15086(c) requires that a city's comments be within an "area of expertise" of the city. The City of Belmont, as an agency responsible for general governmental functions, has expertise in the impact areas reviewed in an IS/MND, including, but not limited to, land use, population, employment and housing, transportation and circulation, public services and utilities, hazardous materials, hydrology and water quality, noise, air quality, and energy. #2-1

In addition, as an entity that frequently acts as a lead agency in completing environmental documents, the City of Belmont has specific expertise in the requirements imposed by the California Environmental Quality Act and CEQA Guidelines.

General

- The City of Belmont is supportive of CalFire fuel mitigation/reduction efforts in the City's and adjoining open spaces that complements the ongoing private property defensible space work completed by Belmont residents. #2-2
- Significant and meaningful recreation areas exist within Belmont that will be affected by the prescribed burn; in particular Plot #6 which encapsulates the Crystal Springs Cross Country Course (CSCCC) located along the most western edge of the City boundary. This public area is widely used by our community and important to both local and regional recreation. #2-3
- Wildfires know no boundaries. As such, the City of Belmont understands and appreciates the scope/intensity of this project in the effort to mitigate wildfire risk and preserve the watershed; the City expects that the project proponent will be mindful in protecting this community resource from any unnecessary impacts, while also taking into account time of use, and minimizing the loss of public access to this recreation area. #2-4

- The City of Belmont expects that best management practices will be employed for the project inclusive of mitigation to protect endangered flora and fauna, and accidental fire spread. #2-5

- Transparency in government actions is paramount to Belmont residents and our community's daily work population. Adequate and timely project notification is expected to keep our citizenry informed of the project schedule, anticipated milestones, and completion. #2-6

The City of Belmont appreciates the opportunity to provide these comments on the Initial Study/Mitigated Negative Declaration (IS/MND) for the SFPUC Prescribed Burn Project in San Mateo County.

The City looks forward to working with CalFire personnel as necessary staff to advance project objectives and implement appropriate mitigation measures for the project as it affects the subject public recreational lands in Belmont. #2-7

If you have any questions about this letter, feel free to contact Carlos de Melo, Community Development Director, at (650) 595-7440 or via email at cdemelo@belmont.gov

Sincerely,

Afshin Oskoui
City Manager

CALIFORNIA CHAPARRAL INSTITUTE
...the voice of the chaparral

To: Sarah Collamer
VMP Coordinator, Cal Fire
CZU Resource Management
6059 Highway 9
Felton, CA 95018
Via email: sacramentopubliccomment@fire.ca.gov

April 5, 2021

Re: SFPUC Prescribed Burn Project

Dear. Ms Collamer,

The California Chaparral Institute is a non-profit scientific and educational organization that focuses on helping communities live safely in California's fire-prone environment in a manner that also protects the natural environment in which neighborhoods are built.

While we concur with the need to reduce fire risk in San Mateo County, we find the rationale and the factual content of the Mitigated Negative Declaration (MND) for the SFPUC Prescribe Burn Project lacking.

#3-1

Community Safety

First and foremost, the neighborhoods adjacent to treatments 3, 4, 5, 6, and 8 all have between 300 to 600 feet of vegetation clearance/management zones between the homes and connecting open space areas. As a consequence, these communities have clearance distances three to six times the recommended 100 feet of defensible space as per PRC 4291. Direct flame impingement does not pose a threat to these communities. The most logical evacuation route near these treatment areas is Interstate 280. The amount of vegetation clearance currently along the Interstate already provides adequate mitigation to support safe evacuations.

For treatment area 7, the most reasonable vegetation management activity to secure Skyline Blvd. as a safe evacuation route would be a continuation of the 100-300 foot mosaic treatments that are currently in place along the eastern side of the road, not disturbing native habitat for 1,000 feet or more as proposed. The MND does not adequately explain the need for such extensive disturbance.

#3-2

Ecological Disturbance

The MND claims, without in-text citations, that,

> *Historical analysis, including analysis of historical photos, indicates that many areas of the project east of the San Andreas fault were dominated by coastal prairie or oak savannah, with some areas eventually becoming shrub dominated due to the lack of disturbance such as fire.*

The MND does not provide adequate analysis to determine what native plant communities would naturally exist in treatment areas 3, 4, 5, 6, and 8. The disturbance suggested in the MND that maintained coastal prairie was likely anthropogenic, such as ranching, rather than a natural fire return interval. Natural fire return intervals are based on lightning frequencies. Coastal California has some of the lowest lightning frequencies in in the western United States, allowing fire free periods of a century or more in some locations. #3-3

Therefore, it is highly likely that the current sage scrub habitat in treatment areas 3,4,5,6, and 8 is merely returning to the natural, shrub-dominated condition. The MND currently does not address this possibility.

Since treatment area 7 is on the western side of the San Andreas Fault, the ecological rationale cited in the MND does not apply.

The MND claim that, *"By returning fire to the landscape, this project may also positively impact organisms that are adapted to fire,"* is not supported by evidence provided within the MND.

The lack of clarity of the MND regarding the role of fire in the treatment areas is illustrated by Mitigation Measure #5. Although the measure correctly states that obligate seeding manzanita species possibly present in the treatment areas are threatened by short fire return intervals, it fails to provide adequate guidance to prevent such a threat. The measure uses an uncited <10-year interval as the temporal threat level. We are unfamiliar with the research that supports this metric. Cal Fire's own Vegetation Treatment Program EIR cites Sawyer et al. 2009 as the guide when determining fire return periods. For manzanita shrubland alliances found in the treatment area, Sawyer et al. 2009 proposes a minimum of 30 years as the lower limit of the community's natural fire return interval. The MND needs to reconcile such inconsistencies. #3-4

Of significant concern is the amount of disturbance that will occur in the construction of containment lines in treatment area 7. This may be where manzanita species (e.g., *Arctostaphylos regismontana*), as well as Ceanothus species (e.g., *Ceanothus thyrsiflorus*), are most likely present. The use of crushers and bulldozers will likely cause #3-5

significant ecological damage, including making the disturbed areas susceptible to invasion by highly flammable non-native weeds and grasses.

Prescribed burns in California often lead to the spread of invasive species, or the replacement of one invasive species with another (Merriam et al. 2007, Keeley 2004). There is currently no mitigation that adequately addresses the spread of invasives due to treatments as proposed in the MND. While Mitigation Measure #17 attempts to address the introduction of weed propagules in the project area by project personnel and equipment, it does little to mitigate subsequent invasions as described in the above cited literature. This inadequacy needs to be corrected. #3-5

Shrublands are valuable to many species, but less useful to others. The MND needs to specifically explain how the project may negatively impact shrubland species (e.g., obligate seeding shrubs, woodrats, Wrentits, etc.) as well as benefit species that depend on more open areas. #3-6

Considering the potential for the presence of sensitive species, a more complete biological survey should be conducted than what is currently within the MND.

Watershed Protection

The MND does not properly explain how the proposed prescribe fire treatments, *"can help preserve water quality by reducing the intensity and spread of a wildfire on the watershed."* #3-7

Since the project will be removing shrub cover from the treatment areas, the MND needs to explain how this will improve both water quality and watershed protection.

Sincerely,

Richard W. Halsey
Director CCI
rwh@californiachaparral.org

Deniz Bolbol
Local Resident
15 Wakefield Court
Belmont, CA 94002
deniz_b@yahoo.com

From: tomercer@comcast.net [mailto:tomercer@comcast.net]
Sent: Monday, March 15, 2021 9:37 PM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>; Collamer, Sarah@CALFIRE <Sarah.Collamer@fire.ca.gov>
Cc: commission@sfwater.org; Johnson, Shannon@CALFIRE <Shannon.Johnson@fire.ca.gov>; Mosher, Matthew@CALFIRE <Matthew.Mosher@fire.ca.gov>
Subject: MND Public Notification Appeal

RE: Initial Study MND for the proposed SFPUC Prescribed Burn Project, San Mateo County, California, Released February 16, 2021. (public comment period extended to Monday April 5th 2021 per Shannon Johnson, CalFire VMP Forester III, March 10, 2021)

Sarah Collamer
VMP Coordinator, Forester I
California Department of Forestry and Fire Protection
CZU Resource Management
Email: sacramentopubliccomment@fire.ca.gov

Dear Ms. Collamer,

We are property owners and residents of 2535 Somerset Drive, Belmont, just 300 yards from the proposed burn project site 6. We learned of the subject MND by word of mouth.

We believe the public notification of this MND was inadequate and does not meet the standards of good faith effort implicit in CEQA regulations. Residents, property owners and members of the public have been denied the right to comment on the MND because they were not notified of the project.

Failure to Directly Notify Properties Directly Abutting Project Site:

The agency cannot assume that impacted residents visit the entrances to the project site on a regular basis to observe the public notices. Direct notification via US Mail is appropriate, justified, and does not constitute undue burden on the agency.

The MND fails to adequately report the large number of sensitive receptors directly next to and within a short distance of burn sites 4 and 6. **At least 50 homes share a property line with sites 4 and 6 and are within feet of the burn site. Approximately 500 homes are within 500 yards of these burn sites. An elementary school of 400 children directly abuts site 4, having classrooms as close as 50 feet from the site.** (see attached images) These residents, especially children and senior citizens, are sensitive receptors. They will be exposed to significant direct impacts during the burn due to smoke, and also risk health impacts from lingering odors and smoke damage entering windows and vents. Home owners also risk financial loss resulting from the degradation of the scenic vistas, which are a significant factor in real estate values in the region.

#4

We request owners and residents of properties abutting the watershed project site be directly notified via US Mail, and that the comment period be extended to 30 days after such mailing.

Inadequate Public Display of MND Notification:

Oddly, the public notice of the MND was placed on the inside of a fence surrounding SFPUC property – on the inside of the property to which this report claims *there is no public use*. Intentionally obscuring the notice by placing it in a *location to which the public does not have direct access* violates the spirit of, if not the specific requirement of, public notification.

We request the MND notice be posted on the exterior of the project site for an additional 30 day comment period from date of posting.

#4

Respectfully,

Frank and Kristin Mercer
2535 Somerset Drive
Belmont, CA 94002
tomercer@comcast.net

From: Deniz Bolbol <deniz_b@yahoo.com>

To: sacramentopubliccomment@fire.ca.gov <sacramentopubliccomment@fire.ca.gov>

Sent: Friday, February 26, 2021, 8:09:58 AM PST

Subject: request to extend public comments

To whom it may concern:

I live in Belmont Heights and by accident, I learned of the proposal to **burn nearly the entire SFPUC Watershed area adjacent to our neighborhood**. Public notice has not been adequately given to this neighborhood which will be greatly affected by this proposal.

I request that the public comment period be extended, at minimum, an additional 30 days. There is no way I can prepare meaningful public comments in this short time period for such a precedent-setting proposal.

I request a response to this email so that I know if the public comment will be extended to April 20.

#5

Thank you.

Deniz Bolbol

Belmont

650.248.4489

From: KACEY KARMENDY
To: Sacramento Public Comment@CALFIRE
Cc: Collamer, Sarah@CALFIRE
Subject: Prescribed Burn in Crystal Springs Open Space
Date: Tuesday, March 16, 2021 2:13:15 PM

I have recently received information regarding the planned Prescribed Burn for the Crystal Springs Open Space. I would like to voice my strong concerns about this plan. First, this seems to go against all efforts to clean up our air. Central Valley farmers are being advised that their open field burning will be curtailed in the future, yet this practice is to be used in an urban environment, close to homes? Second, thisis a WILDLIFE REFUGE area. With no place to escape, how is the wildlife here going to survive? I have witnessed wildlife trying to escape wildfires in Idaho by fleeing across busy highways.
While I agree that prior planning is necessary to avoid catastrophically disastrous wildfires, I believe that this plan should be revisited, and a more wildlife-friendly and environmentally sound policy should be adopted.
Thank you.
Kacey Karmendy
Homeowner, Belmont Heights

#6

From: Pamela [mailto:pamela.stahl@gmail.com]
Sent: Thursday, March 18, 2021 5:56 PM
To: Collamer, Sarah@CALFIRE <Sarah.Collamer@fire.ca.gov>
Subject: :Sarah Collamer-Planned burn-units 4 & 6 in Belmont Hillls

Subject: Attn:Sarah Collamer-Planned burn-units 4 & 6 in Belmont Hillls

Dear Sarah,
I want to provide my views regarding the planned burn in units 4 & 6 in Belmont. Although I feel it is important for vegetation management and prevent major future fires, I don't see or understand the need in the majority of units 4 & 6. I hike there 7 days a week and most of the vegetation is low growing grasses and if there is a burn, I'm worried that only grass or weeds will regrow there. This is not a forest area.
In addition, there are many animals living in these hills. Many deer, rabbits, some coyote and bobcats as well as snakes live in the area. These fires will destroy their habitat.
I am also concerned about the smoke from the fires as the area is very close to our neighborhood.
Do you plan this burn of units 4 & 6 all at the same time? When are the burns planned?
Thank you for your consideration.
Pamela Stahl
Belmont, California

#7

Sent from my iPad

From: Gladwyn D'Souza [mailto:godsouza@me.com]
Sent: Friday, March 19, 2021 4:01 PM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Subject: Initial Study-Mitigated Negative Declaration for the Proposed SFPUC Prescribed Burn Project

Warning: this message is from an external user and should be treated with caution.

To: Sarah Collamer

1. VMP Coordinator, Forester I
   California Department of Forestry and Fire Protection

   CZU Resource Management

   6059 Highway 9

   Felton, CA 95018

   Phone: (831) 224-1215

RE: comments on the "Initial Study-Mitigated Negative Declaration for the Proposed SFPUC Prescribed Burn Project"

We have one ask, please do an Environmental Impact Statement.

These lands as the MND says "are some of the last remaining wildlands in San Mateo County". Elsewhere it's called a " biodiversity hotspot." Yet there is no indication how the controlled burn will support maintaining the wildlands status of these lands. If anything the "pretreated by herbicide application and/or by cutting with chainsaws" and "Dozer lines are created by utilizing a bulldozer to remove all vegetation along the line, only allowing bare mineral soil to remain" degrades the wildlands to desertified anthropocene landscapes. Increased human presence in once upon a time wildlands is a cause of wildfires.

The MND discusses endangered species such as the red legged frog and garter snake but doesn't say how their resident population will be aided by the controlled burns. Larger species like the grey fox aren't mentioned. The MND does not discuss the decline of these species and how the continued decline will be aided by the controlled burn. Instead the MND offers a hypothetical "By returning fire to the landscape, this project may also positively impact organisms that are adapted to fire" which has not worked for islanded species and there is no evidence supplied here to gage the value of this statement. Decreasing biodiversity in landscapes is a cause of wildfires.

"Burn Units were chosen adjacent to roads, trails and existing disk lines to limit the amount of control line that must be constructed." Human infrastructure such as roads and power lines are a leading cause of fires. The MND doesn't say how the controlled burns will help or increase risk in the area. What the statement implies is that the worsening fire situation in California is resulting in a business as usual response from CDF. An Environmental Impact Report would be more useful for both impacted communities and the legislature for dealing with the worsening fire situation in California.

#8

With the economy opening up the number of bad air days are increasing. Adding fire cannot help.

Goats are proven technique for reducing fire on landscapes, so much so that goat thefts are up statewide. They also reseed and declump the area when they poop. This is an alternative that isn't analyzed.

How are food stocks for endangered species, islanded by suburbia, impacted by the control burn on what the MND refers to as serpentine soils? Vehicle emissions from HWY 280 deposit nitrogen which invasive grasses like and grow taller than the native species reducing their range and leading to extirpation. CDF can do more to control wildfires by restricting 280 to only electric vehicles! The checker spotted and mission blue butterfly in the controlled burn target area are a case in point. Instead the landscape is tending toward desertification a problem of humans have worsened on the landscape over the last 300 years. The MND says "Repeated short fire return intervals (<10 years) deplete the seedbank of these species without allowing them to grow to maturity where they can reproduce and replenish the seedbank. Over time, repeated short fire return intervals may result in extirpation of these obligate seeder shrub species if they occur in the project area." There is no indication how extirpation will be avoided for both the plants identified and the species that feed on them. Decreasing biodiversity in landscapes is a cause of wildfires.

#8

The MND says no impact to water quality. But doesn't that depend on the increasingly unpredictable weather swings of the changing precipitation pattern?

The MND says limited recreational impact. However the burned zones will open up more areas for runners increasing trail impacts on species revival.

After considering the questions raised by the MND the prospect of wildfires does not appear to be diminished. An EIR would help answer these questions. Please do one.

Regards,
Gladwyn d'Souza
Chair, Conservation Committee, Loma Prieta Chapter Sierra Club.
https://www.sierraclub.org/loma-prieta/conservation
650 804-8225
@godsouza
The bay will be saved when we can eat from it.

-------- Original message --------
From: hank lawson <hanklawtrack@gmail.com>
Date: 3/22/21 1:27 PM (GMT-08:00)
To: "Collamer, Sarah@CALFIRE" <Sarah.Collamer@fire.ca.gov>
Subject: Crystal Springs Cross Country course Controlled Burn

https://ceqanet.opr.ca.gov/2021020321

The other area listed I'm not really familiar with but the Crystal Springs XC course I am.

I do not believe this "controlled" burn should take place. I have been running on this course for over 50 years and there has never been (or needed) a controlled burn. The only fire that I can recall happened in the early to mid-80's when a disabled vehicle from 280 caught the weeds on fire and the XC course acted as a natural fire break to protect the homes. If fear of fire and protection of homes is the intent of this burn, why not just bulldoze a fire break say 50 meters up from 280 and just do a burn from 280 up to this firebreak? Why put homes in danger?

Now let's go to the XC course... bulldozers? The damage that you can do to the XC course can be major with large scale machinery such as that. A burn in the area will cause the area to have possible errosion issues and I also heard that you wanted to just do a little bit each year, for 8 years! That's rediculus to put the homeowners thru that kind of stree every year for 8 years. A controlled burn is only "controlled" until it's not - think Oakland Hills Fire - no thanks.

#9

hank lawson

-------- Original message --------
From: jclien@aol.com
Date: 3/21/21 3:18 PM (GMT-08:00)
To: "Sampson, Richard@CALFIRE" <Richard.Sampson@fire.ca.gov>, "Johnson, Shannon@CALFIRE" <Shannon.Johnson@fire.ca.gov>, "Sacramento Public Comment@CALFIRE" <SacramentoPublicComment@fire.ca.gov>, commission@sfwater.org, "Collamer, Sarah@CALFIRE" <Sarah.Collamer@fire.ca.gov>
Subject: Prescribed Burn behind our Homes -Needs EIR

Warning: this message is from an external user and should be treated with caution.

We live within 500 yards of your Burn site Area #6 (Prescribed Burn Cal Fire SFPUC Vegetation Management Program) and live right across the street from the Crystal Springs Cross Country Course - SFPUC Watershed. I am very concerned with your proposal for a prescribed Burn adjacent to our residential cluster of 756 households in the Belmont Heights neighborhood (behind Site 4 and 6). Due to the nature and beauty of this watershed, we believe there has **not** been careful thought and analysis done on this unprecedented action. Until recently, only a small poster tacked on a trailhead in the SFPUC was noticed by runners in the watershed with no outreach to residents.

I believe the potential negative consequences of such an unprecedented burn in our backyard to nearby residents, wildlife and vegetation in the SFPUC warrant an Environmental Impact Review (EIR) before proceeding. The following issues deserve further (EIR) review by Cal-Fire and the SFPUC, specifically:

1. Clearing, burning and eliminating the chaparral, scrub and shrubs and converting to complete grassland in Area 4 and 6 potentially creates higher flammability than current vegetation according to environmentalists. In addition, studies have shown that windblown embers are what ignites homes and the embers can be trapped and better contained with shrubs and vegetation. By eliminating the existing vegetation, Cal Fire would be actually increasing the risk of wildfires.

2. Belmont's Fire Marshall has stated that Belmont Heights neighborhood (behind Site 4 and 6) incorrectly labeled by Cal Fire as very high fire risk is in fact not very high risk due to the fact that we have relatively high moisture content compared to the rest of the City. In addition, unlike other parts of California, the winds work to our favor. During the peak fire season in August - November, the dry desert easterly winds from central California will blow any potential fire in the project area away from our homes toward Interstate 280. In the months of March - June, the moist westerly winds from the ocean bring in high moisture coastal air mass to both the project area and our neighborhood reducing chances of fire amidst the fresh spring vegetation.

3. Your prescribed Burn and vegetation mitigation on the West side of our homes will not protect us if the wildfire were to come from the densely vegetated open space canyon to the East of our neighborhood.

4. Residents are very concerned with the potential air quality, water quality, ash runoff and herbicide consequences from this prescribed Burn. Loss of vegetation will also mean soil erosion from high winds and rain.

5. Cal Fire and SFPUC appear to be totally unaware of the heavy recreational use of the Cross Country Course used by many youth league teams and the X country events attended by thousands of participants every August-November, not to mention all the youth that practice daily on the running track.

#10

6. The watershed is home to many wildlife; deer, heron, rabbits, and even mountain lions. What is your plan for a wildlife relocation program before the Burn?

7. SFPUC wildfire prevention practices in the past has been very adequate for decades with annual mowing and disking the entire residential boundary of Sites to a minimum break of 30-50 feet. Why aren't alternative programs being investigated to alleviate this problem such as using goats or better preparing homes for fire resistance?

Before Cal-Fire and SFPUC proceed with this unprecedented Burn in the name of preventing wildfires, a thorough environmental analysis of the above concerns should be done and other safer alternatives should be investigated.

I will be attending your Cal-Fire Zoom meeting this Wednesday evening and would like the following questions answered during your Question and Answer session:

A) Why do you want to convert brush to grass when it's been proven that grass is more flammable and does less to block blowing embers than brush?

B) Since your report didn't mention anything about the 756 households, Fox elementary school or the X country running course used by thousands of youth, are you aware of the potential dangers of your prescribed Burn to thousands in our community; not to mention all the dangers to wildlife residing in the watershed? Do you plan to do an EIR?

C) Have you seriously considered alternatives as well as additional measures such as helping homeowners replace vents and other home hardening methods that better reduce fire risk to complement the annual SFPUC mowing and disking that has been done for the past decades?

#10

Jennifer and Ken Lien
Paddington Ct
Belmont

From: Bob Stahl [mailto:rjstahl01@gmail.com]
Sent: Friday, March 26, 2021 1:23 PM
To: Collamer, Sarah@CALFIRE <Sarah.Collamer@fire.ca.gov>
Subject: Re: SFPUC MND

Hi Sarah,
First off, thank you for the information and your responses.
I listened to the ZOOM meeting on Wednesday night and wanted to make a few comments.
I do believe the burn is important and necessary and I support it.
I do request that the turn be limited to 60 acres per burn and a maximum 200 acres per year as was communicated in the ZOOM meeting.
I do request that this be put in the burn plan by either amending the MND or in the final document.
Thank you.
Bob Stahl
Belmont, CA
Resident of Belmont Heights neighborhood.

#11

From: Jeff Calcagno [mailto:jcalcagno1@gmail.com]
Sent: Thursday, March 25, 2021 7:03 PM
To: Collamer, Sarah@CALFIRE <Sarah.Collamer@fire.ca.gov>
Cc: Natalie Calcagno <nacalcagno@gmail.com>
Subject: Thank you and follow up questions

Hi Sarah,

Thanks to you and Rich for providing information yesterday evening on the SFPUC Vegetation Management Program. We appreciate all the work you and CAL Fire are doing to try to protect our homes from wildfires.

We live on Bear Glen Drive in Woodside a few miles south of Unit 7, just off of Highway 35 (south of Kings Mountain Road, near the relatively El Corte de Madera Creek Preserve parking area). We had a few follow-up questions not directly related to the VMP.

1) In contrast to many of those who commented yesterday, we would potentially be VERY interested in having some controlled burns remove the fuel in the large area just north of our home. Has any thought been given to doing a controlled burn in our area? We realize that it is hilly and that this may make a controlled burn challenging--but it is also a reason to do a controlled burn.
2) Could you please send the slide deck you shared yesterday? We didn't see it in the materials on the website, though we may have missed it.
3) Would you consider assessing our property for fire risk if you are ever in this area? Don Bullard stops by annually and has done a terrific job providing recommendations over the years, all of which we have followed. But additional expert suggestions couldn't hurt, and it appears that you are very familiar with the vegetation in this area from the Kings Mountain Road project. We want to take every measure possible to increase the safety of our home.

#12

Many thanks,
Jeff & Natalie Calcagno

33 Bear Glen Drive
Woodside, CA 94062

From: KACEY KARMENDY [mailto:kckarmendy@comcast.net]
Sent: Tuesday, March 16, 2021 2:13 PM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Cc: Collamer, Sarah@CALFIRE <Sarah.Collamer@fire.ca.gov>
Subject: Prescribed Burn in Crystal Springs Open Space

I have recently received information regarding the planned Prescribed Burn for the Crystal Springs Open Space. I would like to voice my strong concerns about this plan. First, this seems to go against all efforts to clean up our air. Central Valley farmers are being advised that their open field burning will be curtailed in the future, yet this practice is to be used in an urban environment, close to homes? Second, this is a WILDLIFE REFUGE area. With no place to escape, how is the wildlife here going to survive? I have witnessed wildlife trying to escape wildfires in Idaho by fleeing across busy highways.

While I agree that prior planning is necessary to avoid catastrophically disastrous wildfires, I believe that this plan should be revisited, and a more wildlife-friendly and environmentally sound policy should be adopted.

#13

Thank you.

Kacey Karmendy
Homeowner, Belmont Heights

From: Christine Beard <seebeard@comcast.net>
Sent: Monday, March 22, 2021 2:58:58 PM
To: Juliette, Cecile@CALFIRE <Cecile.Juliette@fire.ca.gov>
Cc: Danielle Ragani <danielle.rajani@gmail.com>; Roxanne Bales <rxbus@yahoo.com>; Pauline Roothman <sfpauline@gmail.com>; Jim Beard <beardaffiliates@aol.com>
Subject: Knolls of Belmont - CalFire Proposed Burn Comments

I would like all information regarding the meeting on March 24 re zoom and how we get on record opposing the upcoming burn. See Below:

You are the only residents of the Knolls that I know so I'm sharing this with you because I believe residents there have NOT been notified of the intention of CalFire to burn the open space behind you.
The project was announced in February but the only notice was a small paper on the inside of the watershed gate. I'll attach both the full study and my comments here.

Attached are the comments I plan to submit to CalFire about the burn. Feel free to plagiarize whatever points that you find compelling, and of course add whatever other concerns you have. FYI a number of us lobbied and got the **deadline for comments extended to April 15.**
CalFire has now recognized that they have a PR problem, and although they still refuse to do any direct notification (would 100 stamps hurt them??) they have scheduled a ZOOM webinar for next Wednesday March 24. I will forward the email notice to you.

Briefly, the 12 issues I cite are:

1. Incomplete description/disclosure of the setting and land use (missed the CCC and all the homes and Fox School!)
2. Conversion of scrub to grassland violates CA public resources code 4483
3. Evidence disputing the need for the burn
4. Evidence disputing the effectiveness of fire to reduce hazard in this setting
5. Failure to evaluate alternatives (goats, manual/mowing, home hardening)
6. Lack of wind analysis (El Diablo's blow the opposite direction)
7. Lacking project details (conceals plan for *repeated* burns, doesn't specify scale or timing of each burn)
8. Potential runoff contamination of reservoir
9. Air quality – net long-term carbon increase
10. Direct smoke impacts on residents (the ones that don't exist according to the study)
11. Wildlife impacts (direct and indirect)
12. Impacts to beneficial plants, oaks

#14

Christine Beard

Cal BRE# 01037278

ReMax Capital

https://www.christinebeard.com

Ph: 650-888-2806

155 Bovet Road

San Mateo, Ca 94402

-----Original Message-----
From: Frank Mercer [mailto:fwmercer@vivaldi.net]
Sent: Tuesday, March 23, 2021 5:20 PM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Subject: Prescribed Burn Project, San Mateo County, CA

Warning: this message is from an external user and should be treated with caution.

Dear Ms. Collamer,

I am a property owner in the Belmont Heights neighborhood near the proposed burn project site 6. Identified as: SFPUC Prescribed Burn Project, San Mateo County, CA March 19, 2021

I want to strongly voice my objection to this burn:

1) This burn would back up to the homes located on Hallmark drive in Belmont and poses a risk to homes in the neighborhood. Also, the burn would be next to Fox Elementary school which borders the burn area, another danger. So there is potential fire danger to the homes and the Elementary school.

2) The area of the burn also covers the San Mateo Cross Country course which is used daily by people walking, running and exercising. This would impact the air quality for months after the burn and could affect peoples health, not only for the people who use the cross country course for exercise and recreation, but also people living in the Belmont Heights neighborhood next to the burn area.

3) When I've been walking on the cross country course, I often see deer, rabbits, snakes, birds and other wildlife in the area. The burn would certainly kill many plants, trees, and wild animals and disrupt the native ecosystem.

The proposed burn is not needed and will be harmful and a danger to the residents of the Belmont Heights neighborhood and to the wildlife and ecosystem in that area.

Sincerely,

Dr. Frank W. Mercer

#15

From: Michael Maher [mailto:mmaher@usvp.com]
Sent: Tuesday, March 30, 2021 7:50 AM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Subject: SFPUC Prescribed Burn Project

Warning: this message is from an external user and should be treated with caution.

I am writing in response to the SFPUC Prescribed Burn Project.

I am unable to determine the planned timing of intended broadcast burn, and whether this plan is for a single effort or for multiple and repeat efforts over several or many years.

I am unable to determine what efforts are planned to control rattlesnakes in the area, in particular in the areas of the Crystal Springs Cross Country Course. The homes on the western side of St. James Road, Belmont border the Crystal Springs Cross Country Course and other parts of the Prescribed Burn Project. Over the years, we have experienced rattle snakes in our backyards. I am concerned that broadcast burn could drive rattlesnakes from the burn area into the adjacent housing. Can you address the efforts that will be undertaken to prevent this.

#16

Thank you for the opportunity to submit these questions.

Mike Maher
Resident and Homeowner
2801 St. James Road
Belmont, CA 94002

[H 7745]

From: Kim Marlow [mailto:kimmarlow@sbcglobal.net]
Sent: Friday, April 2, 2021 5:09 PM
To: Collamer, Sarah@CALFIRE <Sarah.Collamer@fire.ca.gov>
Subject: Fwd: Burn notice at Crystal Springs course

Also that course is very close to houses.won't the smoke be unhealthy?

By the way ,the phone number posted there is not in service.

Sent from my iPhone

#17

From: Lynn Olson [mailto:lynnolso1720@gmail.com]
Sent: Sunday, March 28, 2021 11:40 AM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Subject: SCH Number 2021020321

Hi regarding

I am not in favor in burns in San Mateo county SF watershed and destroying the vegetation and beautiful habitat. The vegetation will grow back and is normally more dangerous than the native plants you destroy. This farce gives the neighborhood a false sense of security. Instead of all these burns why doesn't the government and Cal Fire work on funding, educating and helping us harden our homes. Almost all big neighborhood destroyed in recent CA fires are by flying embers. This proposal is a waste of time and money.

#18

Lynn Olson
2724 Yosemite Dr
Belmont Ca 94002

-----Original Message-----
From: Michelle Speert [mailto:mospeert@gmail.com]
Sent: Sunday, March 28, 2021 2:08 PM
To: commission@sfwater.org; Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Subject: CalFrie burn of 385 acres in Belmont Heights

Warning: this message is from an external user and should be treated with caution.

To Whom it may Concern:
I live at 2528 Hallmark Drive in Belmont. I have been informed that there are plans being made to have a "controlled" burn of the land/open space directly across from our house. I'm adamantly against this idea. It's not a solution, it's an unnecessary action that threatens our air, our home, the natural environment and the wildlife.
The area being discussed has full access to fire equipment to douse any flames that may spontaneously erupt. There are no forests, only small patches of leafy bushes. It is a cherished public space that is very popular with hikers, runners and is used by the county for college & high school cross country races, annually. PLUS, 200 acres is the entire area from Fox School to San Carlos, equivalent to 150 football fields or 800 residential parcels, 1 mile long by 1/3 mile wide.
BESIDES all that, it's OUR front yard for over 32 years!
I see no good reason for this burn, and am extremely resentful of the secrecy and lack of transparency. I'm angry that such a hare-brained idea has survived even one meeting. I insist the plan be thrown back in the garbage, where it belongs.
The threat to our air quality, the "scorched-earth" effects it will leave behind, (plus more flammable grass will regrow within the year) is not a solution.
There's already a fire break that is renewed every year. Believe me, this is plan is an over reaction to a danger that could be easily handled by fire hoses, if ever needed.
I insist this plan be abandoned. This plan is dangerous.
RSVP,
Michelle & Paul Speert

#19

From: Karin Hold [mailto:kmhold@hotmail.com]
Sent: Saturday, March 27, 2021 2:44 PM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Cc: commission@sfwater.org
Subject: Initial Study MND for the proposed SFPUC Prescribed Burn Project, San Mateo County, California

Dear Ms. Collamer,

I am a property owner and resident of Belmont, just 500 yards from the proposed burn project site 6. I am also a frequent runner on the Crystal Springs Cross Country Course, located within the burn project site 6. After reading the MND, I request that Cal Fire revise the project.

The cities of Belmont and San Carlos are not mentioned in the project description, although these cities are adjacent to burn project site 4 and 6. Sites 4 and 6 account for 50% of the proposed burn acreage. These cities will be the most impacted by the broadcasted burns. Major impacts will be on the air quality, hazardous materials (herbicide use), recreation (Cross Country Course, Tennis Courts Hallmark Park) and noise from the proposed project.

The primary objectives of the burn project are described on page 6 as: 1. Create or maintain areas of reduced vegetation to protect the water supply for SFPUC customers in San Francisco and the Peninsula; 2. maintaining existing native grasslands by slowing shrub encroachment; 3. Train CAL FIRE personnel in firing and control techniques.

Page 9 of the MND describes the local environment "Substantial areas dominated by grassland occur through the project area." Also, page 57 states "The dominating fuel type is grass, with a variable coyote brush (*Baccharis pilularis*) component. According to Aerial Bing Maps 2020 from the Dudek Report Figure 1D **Burn Unit 6 is largely grassland. Therefore, there is no need for the project at Burn Unit 6. The project objective is already met.**

#20

Page 34 of the MND describes "Burns will be conducted to ensure that smoke generated from the project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation." "The smell of smoke may be present in the area for a day or two, however it is not expected to adversely affect the population. This should be balanced with the fuel reduction benefits this project offered to homes directly adjacent to the burn unit."

We have had to deal with a lot of smoke and staying at home order in the last 1-2 years. People want to get out and enjoy the Parks and Open Spaces. Please do not use a prescribed burn which will severely impact the air quality/smoke smell and keeping windows closed for Unit 4 and Unit 6. Unit 4 and 6 have already reduced vegetation. There is no benefit only drawbacks for Unit 4 and Unit 6.

Sincerely,

Karin M Hold, PhD

Belmont Resident

From: Pamela [mailto:pamela.stahl@gmail.com]
Sent: Saturday, March 27, 2021 5:44 PM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Subject: Fwd: Cal Fire burn of Belmont watershed

Subject: Cal Fire burn of Belmont watershed

After attending the zoom meeting on Wednesday night I am still very concerned with the purposed burns of our watershed. I seriously hope you listen to the public's concerns and make amendments. Enclosed is just a few pictures of the wildlife that lives in this watershed. I feel you are proposing to burn an excessive and unnecessary amount and that the burns should be limited in acreage. I have great concern over where the wildlife will relocate. The fact that you are doing these burns so close to a public school and many homes is also very disconcerting.
Sincerely, Pamela Stahl

#21

From: jclien@aol.com [mailto:jclien@aol.com]
Sent: Thursday, March 25, 2021 4:52 PM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Cc: commission@sfwater.org
Subject: It will be in Your best interest...

Dear Managers of the SFPUC Prescribed Burn (Unit 4 and Unit 6):

Thank you for hosting the Cal-Fire webinar zoom meeting last nite explaining in more detail your MND for the prescribed Burn in Unit 4 and Unit 6 behind my home in the SFPUC watershed. Sarah Collamer, Forrester project manager introduced two new items of information relating to Unit 4 and Unit 6 that should to be included in a reissued MND project document for credibility, transparency and clarification to the public and other subsequent approval agencies.

1. She indicated that Unit 4,5, 6 would not be burned in its entirety but only 30-60 acres in contradiction "up to 200 acres annually" stated on **page 57.**

2. She indicated that Unit 6 will have a significant buffer between the property line and will not be burning up to the homes. The map in the report does not reflect what was said last nite at the meeting. The red line on the current map **(Figure 4)** is drawn right up to Hallmark Drive causing concern and confusion for nearby residents and lack of confidence in the process.

In addition, there were several serious glaring **omissions** in the report that reveal a lack of transparency and concern. It appears from the report that more emphasis was put on special status species and vegetation analysis than on people living in the adjacent community.

3. The report fails to even mention that the Watershed borders 756 households that live behind Unit 4 and 6; that many backyards directly face the Burn within very short distances of their backyards on Hallmark Drive and St. James Road. Indeed, on **page 64-65,** the report actually states there is **no impact** because there are no communities within the project area (true) but fails to mention adjacent homeowners within yards of Unit 4 and 6.

4. The report fails to mention that there is an elementary school of 400 students (**Fox school)** within 500 yards of the prescribed burn.

5. The report also fails to mention on **page 12 under Land Use** that this cross country course is used by thousands of youth for practice and cross country league events. It even states that "recreational use is restricted to Filfied-Cahill Ridge Trail only" which is totally inaccurate.

It is in your best interests as the Cal-Fire agency in charge of this project that **you correct and resubmit this document** including the 5 issues mentioned above and make sure it adheres to all CEQA requirements. As Rich Sampson indicated last night, this is the first of several documents to be issued by Smoke Management and Burn Plan agencies and others. All of them will base their important conclusions and assessments on this document provided by your agency so it must be complete, correct and transparent in order to protect all involved residents.

Thank you for your attention.

Jennifer Lien
Belmont

#22

March 31, 2021

CAL FIRE
P.O. Box 944246
Sacramento, CA 94244-
2460

SFPUC
525 Golden Gate Avenue, 13th
FloorSan Francisco, CA 94102.

RE: Initial Study MND for the proposed SFPUC Prescribed Burn Project, San Mateo County, California, Released February 16, 2021. (public comment close April 5th 2021)

Dear Sirs,

Our complete comments on the **CAL FIRE IS-MND for the Proposed SFPUC Crystal Springs Prescribed Burn** project are in the attached document "Comments on CAL FIRE MND – SFPUC".The comments detail why the study of the proposed burn units is inadequate, and the conclusion is flawed. The IS-MND document has glaring omissions and is riddled with generalizations not supported by evidence.

The project is ill-conceived and **will not achieve** two of the three stated objectives:

Objective #1: *Create or maintain areas of reduced vegetation with the goal to reduce fuel loading and woody fuel continuity where firefighting tactics can be more successful, thereby increasing the safety of neighborhoods near the SFPUC Watershed. By creating or maintaining areas of reduced vegetation, protect the water supply for SFPUC customers in San Francisco and the Peninsula by limiting the spread of wildfire.*

Burning chaparral and grassland on the lands abutting Belmont will *not* increase the safety of neighborhoods. The units adjacent to the neighborhoods are already cleared down to dirt or mowed grass well beyond the homes. In the event of a windblown fire, the **homes themselves and the heavy vegetation in their own yards** will ignite from embers traveling from miles west in SFPUC *forest*, or from the homes and open space *east* of the neighborhood. Paradise and Coffee Park homes burned while the surrounding forest and vineyards resisted the fire. There isevidence that homes surrounded by *barren land* are just as likely to burn when they are not adequately hardened, and this evidence is supported and promoted by CAL FIRE itself.

23-1

Objective #2: *Return fire to the landscape, with the goals of maintaining existing native grasslands by slowing shrub encroachment and potentially restoring some areas of shrub encroachment to open native grassland.*

First, replacing shrubs with grasslands is a bad idea – grass is *more* flammable, not less. Moreover, **CAL FIRE has yet to produce a single documented example of a burn which increased or restored native grasses or reduced fire fuel permanently.** CAL FIRE burns of MidPen's Russian Ridge *increased* invasive grasses. Invasive grasses have a 90% higher fuel load

23-2

than natives, thereby *increasing* risk of damaging wildfires. Burning does not restore natives. **Permanent fire fuel *eradication*** requires restoration of native grasses with lower fuel loads, thus sustainably eliminating the need for annual abatement measures. But restoration requiresa methodical program of careful timing and less invasive mowing, which this plan lacks. Insteadof reducing future maintenance, this project is likely to *increase* the need for annual abatementmeasures – a cycle of increasing waste and pollution.

#23-2

Objective #3: This leaves us with the last objective; training staff. Burning the most concentrated site of endangered species in the State of California for the purpose of **practice** isan unconscionable violation of the intent of CEQA policies. The photo on the front of the IS- MND document shows one of the finest examples of native serpentine grassland in the region and possibly the state, yet CalFire intends to burn it. There are tens of thousands of acres statewide more suitable for *practice* burns – land that is already damaged, and is located far from urban areas. Alternative sites have not been considered as is required by CEQA. After a dismal outcome, MidPen has now denied use of their lands for practice burns, forcing CAL FIREto look elsewhere to burn. "Training" is not adequate justification for destroying the most scenic, rare and pristine native habitat in the region.

#23-3

We support project alternatives (2) "undertake additional environmental studies", or (3) "abandon the

project". Respectfully,

#23-4

Kristin and Frank
Mercer2535 Somerset
Drive
Belmont, CA 94002

Sarah Collamer
VMP Coordinator, Forester I
California Department of Forestry and Fire
ProtectionCZU Resource Management
6059 Highway 9
Felton, CA 95018
Email: sacramentopubliccomment@fire.ca.gov

Dear Ms. Collamer,

RE: Initial Study MND for the proposed SFPUC Prescribed Burn Project, San Mateo County, California, Released February 16, 2021. (public comment close April 5th 2021)

We are property owners and residents of 2535 Somerset Drive, Belmont, just 300 yards fromthe proposed burn project unit 6.

This MND is not sufficient, and a complete environmental impact report is warranted, in which alternative mitigations are explored, including the alternative of "no project".

In this response to the published MND, we detail concerns about this controversial project. The MND **fails to substantiate the need for the project**; there is substantial **evidence supporting a fair argument that portions of the project are not necessary** and will not reduce wildfire hazards as claimed.

The description of project setting and environment is incorrect and incomplete. These errors lead to **incorrect assessment of impacts and inadequate mitigations**. Mitigations are vague and lack enforceable measures. Controlled before and after monitoring is completely lacking,making it impossible for a third party to ascertain the success of the project objectives.

The project's potentially significant environmental impacts require, at a minimum, preparation of an EIR in which **alternative programs are explored for *each unique site*, including the alternative of "no project".** We discuss 13 areas of concern which are inadequately addressed, inadequately mitigated, or both.

#23-5

DISCUSSION OF THE MITIGATED NEGATIVE DECLARATION ERRORS AND OMISSIONS

1. **Incomplete Description of the Existing Environmental Setting and Land Use:**

   The MND omits significant site characteristics essential to the evaluation of impacts. (CEQA Guidelines, §§ 15125, subd. (a), 15063, subd. (d).). **The IS/MND does not inform the decision-makers and the public of the project's setting, as CEQA mandates.**

#23-6

a. Project location: Page 6 lists surrounding communities yet, oddly, omits the City of Belmont, which shares 1.5 mile of property line, is directly impacted by 50% of the total project area, and is also the most densely developed area of all project units.

#23-7

b. Sensitive receptors: The report conspicuously omits that approximately 50 homes share a property line with unit 6, and approximately 500 homes are within 500 yards of the site. Fox elementary school (400 students) adjoins unit 4, yet the report misleadingly states on page 59: "*No schools exist or are proposed within one-quarter mile of the project area.*" A potential 1500 or more persons may be impacted, with a significant percentage being children or the elderly. This **glaring omission and false statement conceals important information from decision makers and the public.**

#23-8

Additionally, **CAL FIRE has denied requests to directly notify properties abutting the project sites**, even though such notification poses no burden to the agency and would not delay the project. Inadequate public notification denies the public the right to comment on the MND and constitutes a lack of good-faith efforts to conform with the intent of CEQA.

#23-9

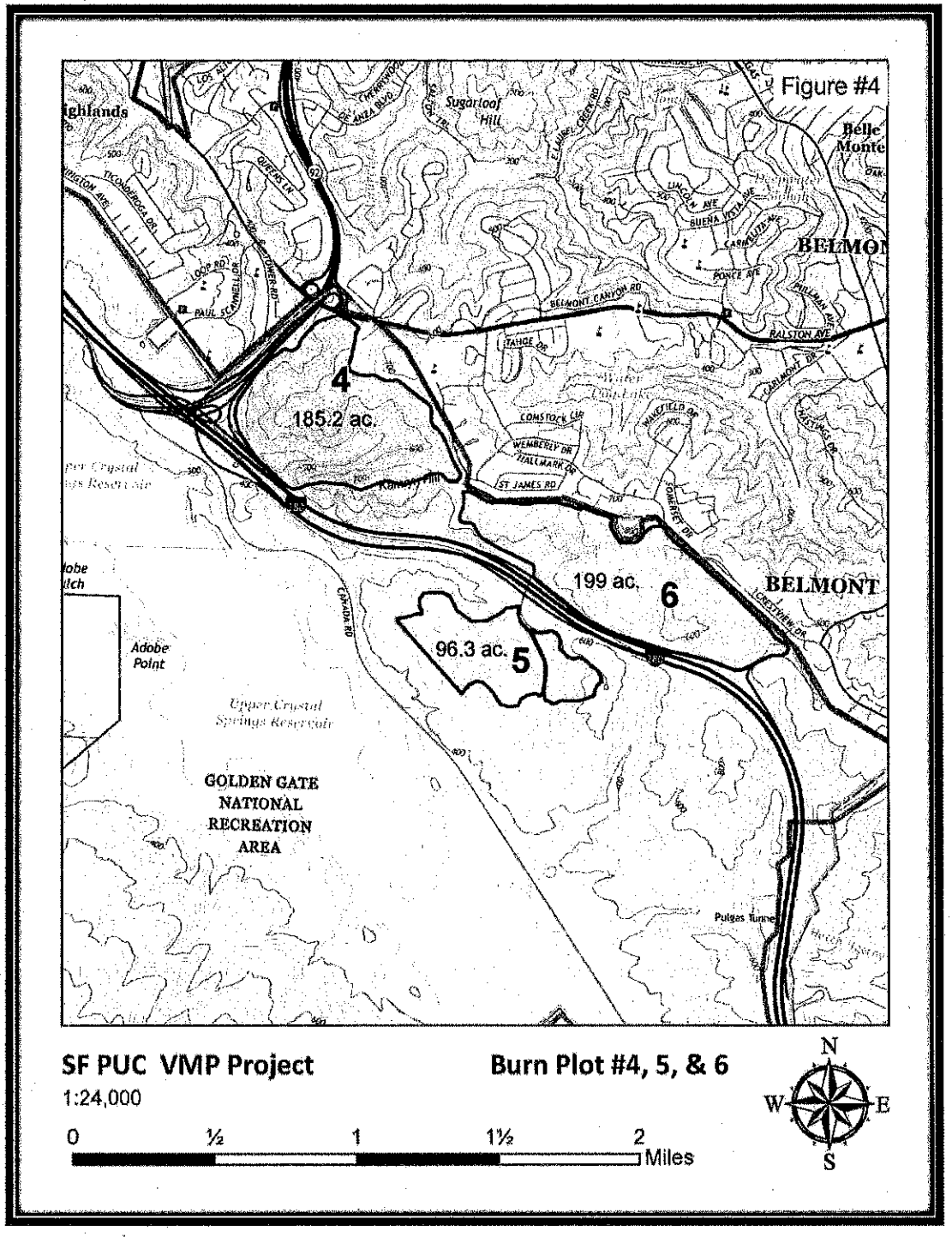
c. Recreational use of unit 6: The MND project site description omits the existence of the 3-mile College of San Mateo Cross Country Course ("CCC track") clearly visible in the image on page 4. The report even *denies* the existence of the track:

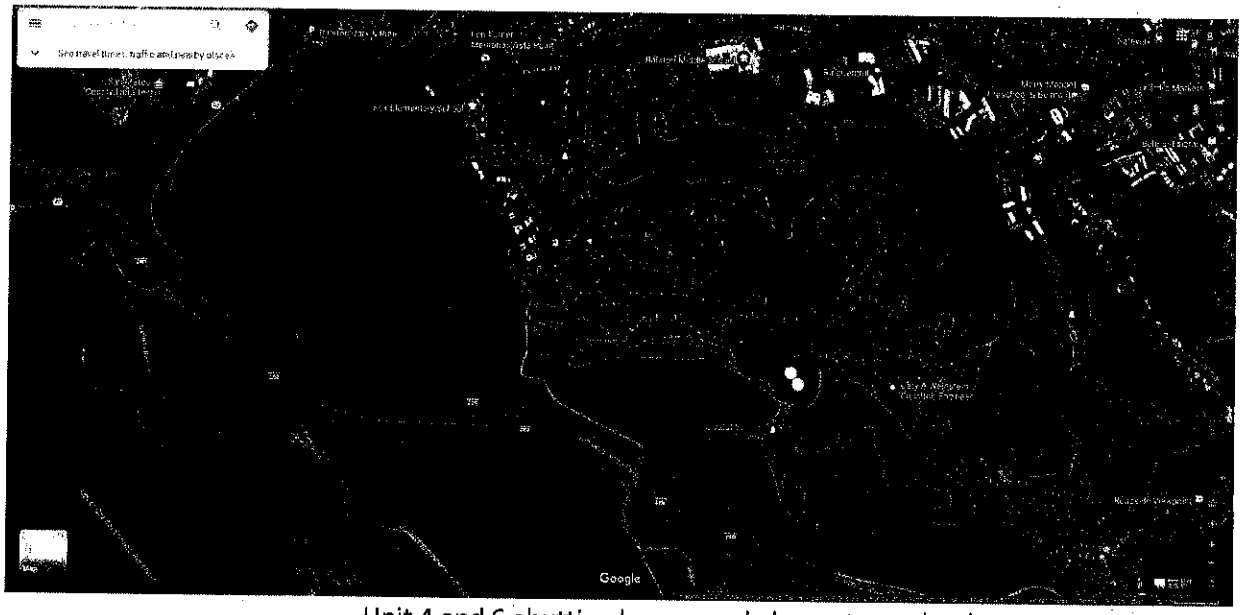
p.9: Recreational activities are restricted to the Crystal Springs Regional Trail operated by San Mateo County Parks and the Fifield-Cahill Ridge Trail which operates on a guided basis on Wednesdays, Saturdays and Sundays.

p.12: The Peninsula Watershed is a state-designated Fish and Game Refuge. Recreational use is restricted to the Fifield-Cahill Ridge Trail, a 10-mile volunteer led trail managed by SFPUC, and the 17.5-mile Crystal Springs Regional Trail managed by the San Mateo County Parks Department.

#23-10

The CCC track is used by an estimated 30,000 visitors yearly. In addition to public usefor recreation on a daily basis, year-round (350/week = 17,000), the track is the site ofyouth league cross country events from August into November. Events and training occur almost daily, and scheduled events are attended by an estimated 17,000 participants and spectators over the course of the 3-month season. Two utility structures, electric power, and other track amenities are not mentioned in the MND.





Unit 4 and 6 abutting homes and elementary school

d. Incorrect description of site characteristics: The MND mitigations generalize the analysis of seven *vastly different environmental settings* into one categorical bucket. In fact, the units are radically different: unit 7 is cypress-eucalyptus forest with few structures, while unit 6 is grassland adjacent to hundreds of homes. Throughout the document, blanket generalizations are made to dismiss alternatives, dismiss impacts, and deny the need for mitigation. For example, this statement about Air Quality:

p. 34: Treating this acreage without prescribed fire would not be possible. These large and steep burn units are inaccessible to heavy equipment. The cost of reducing the fuels manually would be unfeasible. The location of this project – directly adjacent to high density housing, major infrastructure and the water supply for San Francisco makes the cost of inaction too high. Because of the population density and HWY 280, there can be multiple fire starts each year. The area has a significant fire history which must be addressed under the current trend of large, damaging wildfires.

#23-11

Generalization renders these statements false. Unit 6 is treated annually *without* a prescribed fire, and is *not* steep or inaccessible to heavy equipment. No cost analysis hasbeen made to substantiate that manual treatment is "unfeasible". Unit 7 is *not* adjacent to high density housing, infrastructure or HWY 280. All areas do *not* have significant fire history. "The cost of inaction" is not factually established and is a red herring; at issue is the relative cost and impact of *alternative methods* of wildfire risk reduction.

#23-12

Radically different terrain and the extensive presence of endangered vegetation calls forradically different approaches to fire prevention for each site. The **failure to individually**

address the unique features of each site results in an invalid assessment, and fails to inform decision makers of significant environmental impacts unique to each site. #23-12

e. Inadequate survey of sensitive communities: The Dudek report, Table 1, shows the ecologist visited units 4 and 6, the two largest burn units, for a total of 4.5 hours on one spring afternoon. The failure to observe the most obvious features of these sites calls into question the survey and assessment for all other site characteristics throughout the study. The study relies on a brief search of special status plants with potential to occur in the sites. However, CDFW protocols for evaluating impacts states: #23-13

> *"Focused surveys" that are limited to habitats known to support special status plants or that are restricted to lists of likely potential special status plants are not considered floristic in nature and are* ***not adequate to identify all plants in a project area to the level necessary to determine if they are special status plants.***

Known occurrences of sensitive species have been overlooked due to inadequate study, and thus lack mitigations.

It was the State's responsibility to find this information and use it to inform its decision. (See *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1378–1379 ["CEQA places the burden of environmental investigation on government rather than the public."].)

2. **Flawed Objectives – "Type Conversion" Not a Legal Objective.**

The Project Objective #2 (p.6) states:

> *Return fire to the landscape, with the* ***goals of maintaining existing native grasslands*** *by slowing shrub encroachment and potentially* ***restoring some areas of shrub encroachment to open native grassland.***

a. 2018 California Public Resources code CA Pub Res Code 4483 (2018) https://leginfo.legislature.ca.gov/faces/codes prohibits conducting clearance projects that cause type conversion away from native chaparral and scrub: #23-14

> *4483 (c) Prescribed burning, mastication, herbicide application, mechanical thinning, or other vegetative treatments of chaparral or sage scrub shall occur* ***only if the department finds that the activity will not cause "type conversion" away from the chaparral and coastal sage scrub currently on site.***

The **stated project objective violates this CA Code 4483 provision** by clearly stating the **intent to effect type conversion from shrub to grassland.**

b. "Coastal Prairie" assumption: There is no historical evidence that grassland is the native natural vegetation on all sites. To the contrary, there is some historic suggestion that ranch and dairy concerns in the 1800's cleared native brush to support grazing. **One cannot assume that grassland was natural or warrants "restoration".** The biodiversity supported by chaparral communities is of equal importance to the ecosystem. #23-15

c. No plan to achieve the objective of restoring "native grassland" to burned areas. Despite the stated project goal of "maintaining existing native grasslands" no native grass monitoring or restoration plan is provided. Previous CAL FIRE burns at Russian Ridge show that following a burn, invasive species return at a faster rate, resulting in a **net loss of native species.** Less environmentally damaging methods are proven to be more successful:

> *"Since few invasive weeds are effectively managed by a single year of prescribed burning, it is often necessary to incorporate other control options into a long-term management strategy (Kyser and DiTomaso 2002).* "https://www.cal-ipc.org/product/use-of-fire-as-a-tool-for-controlling-invasive-plants/

At a minimum, permanent transects are needed to benchmark species. The lack ofenforceable mitigation measures makes it impossible for a third party to verify conformance, thus ensuring failure of the stated objective.

#23-16

3. Significant Evidence Disputing the Need of Burn Mitigation at Unit 6.

a. No documentation supporting the stated "Need for the Project"

p. 5: *With the current trend of hot, intense and large wildfires, the water supply and high-density population areas **may** face increased risk. This project **can help** preserve water quality by reducing the intensity and spread of a wildfire on the watershed... By returning fire to the landscape, this project **may** also positively impact organisms that are adapted to fire.*

The terms "may" and "can" are speculative; no evidence is provided to support these claims. In fact, **substantial evidence supports a fair argument rebutting these claims.** The study lacks detailed mapping and quantification of fuel loads necessary **to determine the range, moisture content and volume of fuel-load present, thus calling into question the need for burn.**

#23-17

b. Current wildfire prevention measures are adequate. Existing wildfire mitigation practices include annual mowing and disking the entire residential boundary of Unit #6 to a minimum break of 50 feet. Figure 10 of the MND shows this substantial mow/disk control line. The MND asserts that the existing control lines are adequate such that *additional control lines are not required* for the prescribed burn:

p.7 Burn units were chosen adjacent to roads, trails and existing disk lines to limit the amount of control line that must be constructed. For the proposed project, the width of dozer line will generally be the width of one dozer blade, approximately 12 feet.

The document is self-contradictory: Existing control lines are adequate, calling intoquestion the need for the project objective to defend the adjacent neighborhood.

#23-18

MND Figure 10. Existing disk along the WUI on the eastern edge of Unit 6.

1MND Figure 11. Matrix of grassland and coyote brush in Unit 6.

c. Easy defensible access: Unit# 6 has vehicle access on either paved or gravel roads around the entire perimeter of the property, with multiple access points, as well as access via the CCC track to interior portions. No area of this unit is more than 100 yards

#23-19

from easy access by trucks and mechanized equipment. Evidence supports a fair argument that **unit 6 is one of the most easily defendable sites in the SFPUC Crystal Springs tract and does not need abatement.** #23-19

d. Unit 6 is already largely grasslands: Figure 10 of the MND shows the mow/disk line abutting properties on the east. In the satellite image of units 4-6 it is evident that the predominant vegetation is invasive grass species, and the report confirms (p.57) *"The **dominating fuel type is grass**, with a variable coyote brush (Baccharis pilularis) component."* There is no evidence that burning grassland will reduce wildfire risk for more than one season, and there is a **fair argument that the short-lived benefit of burning grassland is far outweighed by the negative environmental impacts.** #23-20

A more detailed evaluation of *each individual unit* - including the topography, access, vegetation type, fuel load and moisture content, etc. - is required to determine the need for fire in each unique area. **The report fails to substantially establish the need for the project at each distinct unit, as required by CEQA standards.** #23-21

4. **Significant Evidence Disputing the Effectiveness of Fire to Reduce Wildfire Hazard in this Setting.**

a. Windblown embers: Studies of wildfires in both northern and southern California the last 3-5 years have revealed that windblown embers have easily overflown freeways and fire breaks, traveling miles to expand fires. The windblown embers of the Camp Fire and Coffee Park skipped miles over both controlled areas and vegetated areas to ignite in the attics and fuel of houses. Even if the entire project unit 4-6 were plowed, in a wind-blown event, embers are likely to overpass the control area and ignite the homes. CAL FIRE has acknowledged that Vegetation Treatment Programs **will not be effective during wind-driven fires**, the fires that kill the most people and destroy the most homes. https://www.fire.ca.gov/media/5511/top20_destruction.pdf There is ample evidence for the fair argument that **a controlled burn of units 4, 5 and 6 will not prevent the hop-scotching of a wildfire in a high-wind event.** #23-22

b. Lower flammability of chaparral and oaks. Studies prove that chaparral and oaks are less flammable than dry grasses. "Coyote Brush (Chaparral) leaves have a waxy coating that reduces the amount of moisture lost to evaporation into the air. Best of all, the leaves are fire-retardant, meaning that they have a chemical makeup that reduces their ability to catch on fire." https://blueplanetbiomes.org/coyote_brush.php. Page 34 of the MND even describes the need to dry some shrub in order to facilitate burning, thus **contradicting the report's claims of the need** for fire suppression: *"Some of the heavier woody material will be crushed or killed prior to burning to increase consumption. This material will be allowed to dry 30 days before burning."* The MND presents **no evidence that converting chaparral habitat to grassland will reduce flammability** of project units. #23-23

c. Ambient temperature lowers fire risk: Oak woodlands and chaparral have been shown to lower surrounding ambient temperatures, thus mitigating heat patterns, slowing the #23-24

drying of grasses and decreasing fire risk. Shrub has a higher moisture content than grass. Fine fuels (weeds and grasses) that typically replace chaparral *increase* the flammability of the landscape. There is credible evidence that **converting chaparral to grassland may increase flammability of the surrounding vegetation.**

#23-24

d. Higher fuel and flammability of invasive species: Research now suggests that native grass species have as much as 90% lower fuel load than invasive species. However, the 40-year practice of annual disking of the eastern border of unit 6 has eliminated all natives, leaving only the more flammable invasive species. This SFPUC example is key evidence that practices such as those planned for this project are **likely to increase flammability and increase annual abatement needs instead of decreasing them.**

#23-25

5. Failure to Evaluate Alternatives to Burning.

The SFPUC 1999 EIR; Chapter III Program Level Environmental Setting and Impacts states:

"Actions to reduce the threat of fire hazards through fuel reduction (Action fir8) or to enhance wildlife habitat (Actions con4 and wil7) could ultimately result in soil erosion. The extent of this erosion would depend on the techniques used and the extent of plant and root-system removal. Some fuel reduction practices are not as severe, such as ***mowing and pruning. Erosion from this kind of fuel reduction would be less severe than that from a large prescribed fire.***"

The MND fails to consider alternatives to the proposed burn that reduce or eliminateenvironmental impacts, such as:

a. Goats are a proven technique, so much so that goat thefts are up statewide. Goats also reseed vegetation, increase soil permeability, and fertilize. They are able to access steep and rocky sites such as that of unit 4 and 7. Goats have been utilized for over 20 years on the hillside just yards from unit 4 (Knolls Townhomes), proving their safety and effectiveness in areas similar to unit 4.

b. Home hardening: Figure 10 of the MND clearly exhibits the dense vegetation of the abutting residences, which is known to pose a greater fire risk than the vegetation on the adjacent SFPUC lands. Multiple credible sources, including CAL FIRE itself, maintain that "home hardening" steps are the most successful and cost-effective measures to lower wildfire risk.

Deniz Enea, Fire Marshall, Woodside Fire Protection District and Chair of the Fire Safe San Mateo Council: *"The main reasons homes ignite revolve around how our structures are built."*

Brian Nowiki, California Climate Policy Director, Center for Biological Diversity: *"...we need to treat those houses themselves and the areas directly around them, not by cutting trees and shrubs away from communities..."*

c. Mowing and manual clearing, less disruptive than plowing and burning, have been proven more effective in restoring native species, and thus naturally reducing the need for annual fire abatement measures. In fact, the project describes extensive manual

#23-26

preparation of burn sites, calling into question the need for burn when manual efforts have already thinned fuel and created fire-breaks. The most cost-effective approach is to **restore the less flammable native species, thus reducing future maintenance needs.**

#23-26

The primary intent of CEQA is to ensure adequate consideration of alternatives that have the least environmental impact. <u>This study fails to meet minimum CEQA standards in this regard.</u> There is substantial evidence for the fair argument that alternative methods of risk-abatement would be less costly, more effective at reducing fire risks, and have a lower impact (or even positive impact) on the environment. An analysis of alternatives should be *site-specific* and include factors such as topography, access, vegetation type, fuel load, moisture content, long-term effectiveness, and cost comparisons.

6. **Lacking Analysis of Wind Patterns That Play a Major Role in Wildfire Dynamics.**

In the event of a wind-driven wildfire, a control *west* of unit 4 and 6 urban neighborhood may not protect homes from burning:

#23-27

- The winds that occur during the highest fire risk season – August to November - come from the hot, dry inland areas (*"El Diablo's"*), blowing *westerly*. The homes are on the east of the project area, meaning that during the most likely fire-season event, fire will be blown *away* from homes, not toward homes.
- *Easterly* winds, blowing from the proposed burn area toward the homes, occur predominantly in the spring months of March-June. During these months, moisture content of the coastal airmass and spring vegetation is a natural wildfire inhibitor.

The study fails to analyze seasonal wind patterns and the seasonal moisture content of vegetation in conjunction with those likely wind patterns. There is evidence to support a fair argument that **likely prevailing wind and weather patterns contradict the need for the project at units 4 and 6.**

7. **Lacking Binding Conditions of Approval and Enforceable Mitigation Measures.**

a. <u>Repeated burns</u>: Mitigation # 5 mentions *repeated burns* which are not addressed or analyzed in the Project Plan at all, and **exceeds the scope and limits of this MND**. Repeat burns are a burden upon adjacent receptors and a documented source of desertification (Some native species, notably manzanita and native grasses, risk total elimination without extended periods between burns.) Failure to disclose and study impacts of repeat burns withholds information necessary to determine whether mitigation measures are adequate to reduce impacts to a less than significant level. Equally important, it **denies the public the ability to comment on *subsequent projects* carried out on these sites**. Project Objective #3 – staff training – opens up the **scenario of annual repeated burn of these parcels for training purposes.**

#23-28

b. <u>Inadequate mapping</u>: Mitigations refer to avoidance of sensitive natural communities yet those same communities are *included* in the mapped burn areas. Oak woodlands,

#23-29

pristine serpentine grasslands and riparian areas, which mitigations state will be excluded from the burn, **must be excluded from mapped burn areas. The failure to delineate excluded areas denies the public the ability to enforce the claimed mitigation measures.**

#23 -29

c. Lacking details of event and binding conditions of approval. The project description lacks implementation details needed to determine what mitigations are needed. Discussion of mitigation measures mentions the *expectation* of burning 200 acres annually but provides no detail for how sites will be selected or the timing of the burns. 200 acres constitutes the entire acreage of unit 6, and is a far different scenario than burning 10 acres at 20 locations over many years.

#23 -30

The MND lacks implementation details needed by the public and decision makers in order to determine project impacts and enforce mitigation measures.

#23 -31

8. Potential Water Contamination from Burn Residue Flowing into Reservoir.

a. SFPUC Water quality plan: SFPUC cites water quality as the primary objective for prohibiting pubic access: *"Because of its 150-year history as a protected source of safe, high-quality municipal drinking water, much of the watershed is not open for recreational activity."* https://sfwater.org/index.aspx?page=199 The SFPUC 1999 EIR – Table III.D-4 lists three "Potentially Significant Water Impacts" and all three involve impacts from prescribed burns. In contradiction, on page 64 the **MND denies any water quality plans exist:** *"The proposed project has no relation to a water quality control plan or sustainable groundwater management plan."*

#23 -32

Even the creation of a limited access trail on SFPUD's Fifield-Cahill Ridge engendered afull Environmental Impact Report, including the alternative of "no project", which wasscrutinized by extensive public debate and required extensive mitigation.
https://sfwater.org/modules/showdocument.aspx?documentid=9337 The potential for ashrunoff to impact water quality warrants at least as much environmental analysis.
Burning hundreds of acres of watershed land, some of it directly uphill and less than a mile from the water itself, is an **unexplainable contradiction of SFPUC's policies and a glaring omission from the study**.

b. Impacts of ash runoff: The USGS reports *"Runoff from burned areas contains ash, which may have significant effects on the chemistry of receiving waters such as lakes, wetlands, reservoirs, and rivers. Runoff from burned areas also produces higher nitrate, organic carbon, and sediment levels, warmer temperatures, and flashier streamflows."* https://www.usgs.gov/mission-areas/water-resources/science/water-quality-after-wildfire? The MND affirms this concern:

#23 -33

p. 60 Broadcast burning can result in an increase in run-off, erosion, and sedimentation, particularly in scrub and grassland vegetation types where fire severity is generally higher and more bare soil occurs following burning.

Oddly, after citing the potential erosion impacts of burning, the MND evaluates the potential for *herbicide* and *equipment* impacts but provides **no analysis of impacts from ash or erosion runoff**. The MND dismisses water quality impact with the extraneous statement *"This project can help preserve water quality by reducing the intensity and spread of a wildfire on the watershed"*, again employing speculation (*can*) without supporting data, and failing to consider project alternatives having less impact.

#23-33

9. Air Quality - Net Long-Term Carbon Increase due to Reduced Vegetation.

a. Loss of carbon sink: Chaparral and trees are shown to be a valuable carbon sink; in contrast, burning these fuels releases carbon into the atmosphere contributing to climate warming. Additionally, larger vegetation and trees produce oxygen which improves to air quality. The combined impact of adding smoke particulates to the air while removing carbon sink and oxygen production has a negative impact on air quality, suggesting a **fair argument that the project impacts outweigh benefits**.

#23-34

b. Vegetation removal raises ambient temperatures. When larger vegetation is removed, the finer underlying vegetation and grasses dry faster, leading to a cycle of warmer air masses, increased moisture loss and increased fire risk. Increased ambient temperatures and transpiration lead to increased wildfires, creating an ever-increasing cycle of warming and air quality impacts. There is a **fair argument that the long-term project impacts outweigh the short-term benefits.**

#23-35

10. Inadequate Assessment of Direct Smoke Impacts on Abutting Residents

The MND fails to disclose that at least 50 homes and an elementary school of nearly 400 children *directly* abut burn unit 4 and 6, plus approximately 500 homes are within 500 yards of these units. Lacking this disclosure, the MND fails to quantify the impacted population, and offers no mitigation for smoke exposure on the burn days, nor subsequent respiratory impacts from lingering odors and dust emanating from a burned area**. The IS/MND does not inform the decision-makers and the public of the sensitive receptors and potential impacts, as CEQA mandates.**

#23-36

11. Wildlife Impacts Under Estimated.

a. Biological hotspot and indirect impacts: MND page 9 states *"The Peninsula Watershed is also considered a Biodiversity hotspot."* Hotspots are defined as regions having lost at least 70 percent of original natural habitat, usually due to human activity. On the peninsula, SFPUC lands represent that remaining 30%. Biodiversity is important for ecosystem balance, and all species, regardless of the state of endangerment, play a role in a balanced ecosystem. **CEQA requires, at a minimum, protection of special status species, but in this remaining biodiversity hotspot habitat ALL species should be prioritized for preservation of the ecosystem diversity.** Indirect impacts of dislocation

#23-37

and destruction of nesting and forage grounds are not addressed or mitigated.

(Shortcomings and omissions of the MND are addressed in further detail underMitigations.)

#23-37

b. Habitat islands: Units 4 and 6 are completely surrounded by the unsurpassable barriers of 6-lane freeways, fences and urban development. Bobcats, jackrabbits, woodrats, coyote, deer and various raptors are documented in significant numbers on all units. Dislocation of wildlife into adjacent urban areas, or even adjacent territories, will impact their survival, and can destabilize the ecosystem in a ripple effect.

#23-38

c. Riparian habitats are protected under multiple federal and state codes, and are habitat for numerous endangered and special status species. The riparian zones of unit 5 and 8 lie at the bottom of a valley where wildfire is unlikely to pose a threat. Species dependent upon these habitats cannot flee oncoming fire, nor is there any suitable habitat where they can flee. Impacts of toxic runoff on the water quality are not analyzed. Alternatives to burning were not considered. **The minimal wildfire risk posed by the riparian zones does not outweigh the impacts of eliminating the already diminishing habitat for multiple endangered species.**

#23-39

12. Impacts to Sensitive and Beneficial Plants Inadequately Mitigated.

a. Native grasses not delineated. The cover photo on the MND displays the most pristine native grassland in the bay area, of the highest concentration of endangered species likely remaining in the region. Page 5 of the Dudek report states:

> *Unit 3. The grassland in the southern portion of the unit is located on a serpentine outcrop and supports high-quality native perennial grassland dominated by purple needle grass (Nassella pulchra).*

The State of California considers non-serpentine native wildflower fields and native bunchgrass habitats among the rarest and most endangered plant communities in California. As has been shown by studies of 2007-2009 CAL FIRE burns of MidPen's Russian Ridge, native species have a low survival rate of fire, and invasive species areshown to re-establish faster, thus choking out the natives. And those invasive speciesare proven to have a higher fuel load than natives. https://www.ecoseeds.com/contents.html There is substantial evidence for a fair argument that the **burn is likely to *increase* invasive grasses, result in a higher grassland fuel load, and thus fail to achieve the project objective.** Site maps should clearly delineate and exclude native grasslands from burn areas.

#23-40

b. Chaparral beneficial services outweigh fire hazard. "chaparral ecosystems provide critical ecosystem services, most directly through their role in erosion control, hydrology, biomass sequestration, and preservation of biodiversity. These functions will increase in significance in the future under conditions of reduced precipitation and warmer temperatures." https://www.researchgate.net/publication/324337489_California_Chaparral_and_Its_Global_Significance The MND fails to make a case for

#23-41

removal of chaparral, and **fails to offer mitigations to ensure re-establishment of chaparral instead of invasive weeds following a burn.**

#23 -41

c. Protections for oaks vague and lacking: Oak woodlands have the richest wildlife species abundance of any habitat in California. The oak woodlands in the study area are **natural undisturbed habitat, and are considered Sensitive Natural Communities** due to their relative rarity and threats to their persistence. The oak woodlands of units 4-6 have thus far avoided damages from sudden oak death (SOD) which has decimated Woodside and Stanford hills to the south. This healthy forest, *especially the young and smaller specimens*, provide an opportunity for restoration of native oaks to the region hard hit by SOD. Instead, the plan indicates removal of younger trees regardless of species or health:

#23 -41

> *p.8 Trees under 10 inches in diameter may need to be thinned or removed to reduce fire intensity in some areas. (Dudek p.2)*

There is no evidence of need to interfere with healthy oak groves. Site maps should clearly delineate and exclude oak woodlands from the project areas. Mitigations are needed to prevent introduction of SOD to these healthy woodlands.

Oak woodlands, chaparral, native grass areas and areas of prior burns should be clearly delineated and EXCLUDED from the site maps to guarantee non-interference with these areas.

13. Objective #3 to Train Personnel is Inappropriate on Biodiversity Hotspot.

Following several years of controlled burns for *training* purposes on MidPen's Russian Ridgethe burns were determined to have a *net negative impact* on the environment, leading MidPen to halt the practice at that site. CAL FIRE is thus in search of training sites. However,the CAL FIRE objective of burning for training **contradicts the stewardship principles exemplified by** SFPUC. This land is some of the most pristine, natural habitat in the state, with one of the highest concentrations of endangered species of both plants and animals.
SFPUC land management objectives are aimed at achieving their goals of safe and clean water supply and long-term health and sustainability of their lands. *Practicing* with fire doesnot fall within the SFPUC mission.

#23 -42

SUMMARY

The project analysis is vague and generalized across project sites of vastly differing conditions,and it omits critical facts. The agency does not have enough information to substantiate the *need* for the project and to determine the impacts of the project or whether the mitigation measures are adequate to reduce those impacts to a less than significant level. The MND fails the CEQA "Fair Argument standard" which holds that under CEQA, an agency must prepare anEIR "whenever it can be fairly argued on the basis of substantial evidence that the project mayhave significant environmental impact."

#23 -43

ENVIRONMENTAL CHECKLIST AND MITIGATION DISCUSSION

The determination of Mitigated Negative Declaration is incorrect. The vastly differing project sites were not accurately described, and impacts are generalized across vastly differing conditions and therefore not adequately assessed. Multiple categories warrant an assessmentof "*potentially significant impacts*" on at least some units.

This section addresses the sections of the Environmental Checklist for aesthetics, air quality, biological resources (vegetation and wildlife), geology and soils, hazardous materials, water quality, and recreation.

#23-44

AESTHETICS:

a) The MND mischaracterizes the individual burns as only 1% of the watershed in an individual year. In fact, 200 acres – the suggested single burn– is 100% of unit 6, which is a *potentially significant impact* to the aesthetics of the land, directly impacting adjoining residences and 500 nearby homes, as well as 30,000 CCC track users.

b) Highway 280 is promoted as the "World's Most Beautiful Freeway" due to the scenic section through San Mateo county, and the report confirms *"numerous designated state scenic highways occur in the project vicinity and would have views of the project area."* A burn area of 200 acres – 1 mile long by 1/3 mile wide – along a scenic route will be a *potentially significant impact* to the scenic resources, for which no mitigation is proposed.

c) All burn sites are on distinctly *non-urban land* where the character and quality of public views of the site will have *potentially significant impact* to public views.

#23-45

AIR QUALITY:

b) Vegetation is widely acknowledged as an effective carbon sink, and has the added benefit of oxygen production, both qualities that mitigate global warming. The combined impact of decreasing beneficial vegetation with an emission-producing fire may result in a net long-term increase in pollutants.

Fuel reduction is not a relevant mitigation for air-quality and health impacts.

A 200-acre burn, if done in in one event, will have a potentially significant impact on airquality and directly impact sensitive receptors in the vicinity.

The assertion that "*treating this acreage without prescribed fire would not be possible*" is speculative and contradicted in the report by assertions that unit 6 control lines are adequate to prevent fire spread.

#23-46

c) The project may expose sensitive receptors to substantial pollutant concentrations. The report states *"The project area is located adjacent to a dense urban area with sensitive receptors including schools, hospitals, senior housing and State Highways among others."* If the stated 200 acres (150 football fields) is burned in one event next to this urban population there will be significant exposure of sensitive receptors. Risks are increased for the young and the elderly who constitute a large percent of the adjacent population. Smoke entering homes through vents and windows can damage property and lead to long term health issues. The study **fails to quantify receptors and fails to demonstrate less than significant impacts.**

Public notification is not a relevant mitigation for *exposure* to pollutants; *knowing of the event* does not reduce, eliminate or mitigate the impacts. General public announcement is not adequate to reach all individuals; **direct notification is warranted and does not pose a burden on the agency.**

#23-47

d) The report fails to evaluate air quality impacts *following* the immediate smoke dispersal. Emissions and residual odors may linger in the area for days after a fire. There is no data to support the MND claim that lingering smoke and odors will not affect the population:
p. 35 "The smell of smoke may be present in the area for a day or two, however it is not expected to adversely affect the population. This should be balanced with the fuel reduction benefits this project offered to homes directly adjacent to the burn unit."

To the contrary, there is evidence for a fair argument that subsequently dispersed particulates can have potentially damaging health effects on a substantial portion of the population. Public health cannot be traded for unquantified "fuel reduction benefits."

Anecdotal reference to a *winter* burn on another SFPUC property is not indicative of impacts of a *non*-winter burn at the proposed sites.

#23-48

BIOLOGICAL RESOURCES:

a) Direct or indirect impact on special status species:

PLANTS:

Mitigation #1 purports to address special status plant species with a plant survey. Pre-treatment survey alone is inadequate to determine project success; at a minimum permanent transects are needed to establish before and after species populations.

The *timing* of the burn is critical to the protection and propagation of each species. The MND mentions on pgs 41-42 the seasonal variations in species germination and seeding, and their uniquely different responses to fire. However, lacking site-specific mapping of special status species *together* with the most opportune burn period for each species present at each site, there is no assurance each species will be simultaneously treated at

#23-49

the most opportune time. Site maps need to delineate special status species, and eitherexclude them from the mapped burn area or address the specific burn season.

Mitigations #2, 3, and 4 lack enforceable measurements which are needed to confirm impacts. The mitigation does not provide protection but merely a vague statement thatendangered species "will be avoided wherever possible" At a minimum the mitigation requires detailed mapping of species and the establishment of permanent transects to enable evaluation of the project adherence to these mitigation measures.

#23-50

Mitigation # 5 alludes to repeated burns which are not revealed in the project plan:

Pg. 25: "Sufficient time will be given between burns to allow replenishment of the seedbank. The fire interval required to maintain special status obligate seeders will be determined by a qualified botanist based on a population level, site-specific analysis."

Repeat burns are a documented source of desertification. Some native species, notably manzanita and some native grasses, risk total elimination without extended periods between burns. The agency fails to disclose plans for, or justify the need for, repeated burns. The report lacks information needed to determine whether the mitigation measures are adequate to reduce impacts to a less than significant level. Moreover this one mitigation opens the door for repeated annual burns which are outside the scope ofthis project analysis, in violation of CEQA intent.

#23-51

Mitigations # 13, 14 and 15 address serpentine grassland: Serpentine grasslands are considered sensitive communities not just because of endangered species but becauseof the assemblage of many species in a biodiverse habitat. These mitigations lack
protection for the communities as a whole, and promise only to protect "whenever possible" and damage "when it cannot be avoided". This distorts the intention of CEQAwhich is to *prioritize* the protection of endangered and sensitive species. At a minimumthe mitigation should require advance specific site maps of these communities, exclusion of them from the burn areas entirely, and measurable benchmarks to enabledetermination of impacts after the project.

#23-52

Mitigation #17 fails to provide SOD protocol: The healthy oak woodlands of units 3, 4, 5,6, and 8 should not be encroached upon at all. They pose less fire risk than surrounding habitat and are possibly the most undisturbed oak woodlands in the area. Site maps should clearly delineate these areas as *excluded* from the burn area entirely. Mitigationsshould require adherence to the California Oak Mortality Task Force guidelines.

#23-53

Lacking enforceable mitigation measures: At a minimum, the project should provide the ability of a third-party to verify the impact upon native species. Permanent transects areneeded at all sites and for each vegetation community to ascertain the before and after density and character of native species.

#23-54

ANIMALS:

Mitigation #6 addresses the *current presence* of Mission Blue butterfly eggs or larvae on lupine but does not address protection of the *host plants themselves,* and states *"activities may commence in the fall without implementing avoidance measures."* Burning at the wrong time can prevent reseeding of host plants, leaving no hosts for subsequent year eggs. It is our understanding that USFWS requires an incidental take permit for removal of host plants, yet this permit is not listed under ENVIRONMENTALPERMITS on page 24. The MND should detail specific plans and mitigations for destruction of host species, and list any permit required.

#23-55

Bay Checkerspot butterfly is listed by USFWS as threatened. The population and the host plants, plantago erecta, are documented in Edgewood Park, just 1 mile from unit 8and 2 miles from units 5 and 6. Generally, one season is not sufficient for completion ofdevelopment and the larvae must enter dormancy until the following winter when the rains allow plant growth to begin again. This species was omitted from survey.

Mitigation #7 and 9 reference required USFWS and CDFW permits for species relocation:

p. 78 *"Any San Francisco garter snake or California red-legged frog found in a location where it may be at risk will be captured and released* ***(if proper permits are obtained from USFWS and CDFW)*** *in a safe area or allowed to leave the area on its own accord."*

These species are covered under USFWS Endangered Species Act and require an
"incidental take permit". Required Environmental Permits should be disclosed on page 24 under ENVIRONMENTAL PERMITS. Release of these endangered species into "a vegetated area near the point of capture" is totally inadequate if the riparian habitat needed for their survival has been altered. The mitigation should require verification ofequivalent healthy riparian habitat for release of any captured animals.

#23-56

Mitigation #10 addresses the presence of nesting birds but fails to address the reductionof forage habitat or of prey species for raptors. Burning of grassland and shrub can reduce reptile and rodent prey species, forcing raptors to abandon territory, potentially destabilizing the wider population balance. Surveys need to quantify an adequate level of appropriate habitat remaining after the burn to support the documented population.

#23-57

Mitigation #11 permits "humane eviction" of endangered species bats. Given the rarityand important role of bats, no eviction is justified for mere fire abatement. All roosts should be left in place until the roost is no longer active, and burn area must exclude such sites.

#23-58

Mitigation #12 addresses woodrat nests. The dusky footed woodrat plays a vital role in abalanced oak woodland habitat and is a listed "species of concern". The MND fails to identify the large population of woodrat nests in units 4, 5 and 6 and thus fails to require mitigation on those units. For unit 8 the report admits inevitable "mortality of

#23-59

individual woodrats" which contradicts best practices for a listed species. The plan proposes to reduce shrub cover and preserve only a 10-foot buffer around the nest; elimination of forage territory and brush cover will negatively impact survival.
Furthermore, impacts to this mid-level species, which is both prey and predator, can have a wider impact to the ecosystem balance.

b) Riparian habitat. At a minimum, the riparian communities in the study area are protected under section 1602 of California Fish and Game Code (Lake and Streambed Alteration Program). In addition, all aquatic features in the study area are protected under the federal Clean Water Act, and the State's Porter-Cologne Water Quality Control Act. Riparian areas are habit for several endangered species listed in the report. The report notes riparian areas are lower elevation, vegetation is green and fire intensity is expected to be low, which negates the need to burn these sensitive protected communities at all.

Moreover, broadcast burn is proposed in close proximity on the slopes surrounding these riparian basins. No mitigation is provided for the pollutants of ash and sediment likely to flow down into these sensitive habitats, having a **potentially significant impact** on the animals and their habitat.

#23-60

d) Native and migratory wildlife corridors. The entirety of SFPUC lands are defined as a Biological hotspot. There are large populations of deer, bobcat, fox, coyote, jackrabbit, quail, and other native species that play an important role in diversity and ecological balance. Units 4 -6 are habitat islands, surrounded by 6-lane highways and fenced urban development. Even those who are capable of fleeing fire have nowhere to flee. Their displacement into surrounding urban areas will have a significant impact on their survival, and displacement into surrounding natural areas can disrupt the eco-balance there. Raptor species are highly territorial and destruction of hunting territory for these birds is not addressed in the MND. No mitigation is offered to reduce direct impact or displacement of these animals, nor impacts of habitat dislocation on the ecosystem balance.

#23-60

GEOLOGY AND SOILS

d) Risk of landslide. Landslides are a significant risk in burned lands, especially on slopes with unstable soils or steep slopes. Removal of vegetation root structures that stabilize soils on steep slopes has resulted in deadly landslides in Santa Barbara, and more recently in the Santa Cruz mountains, resulting from heavy rains following a burn.

The City of Belmont has completed geological analysis of the San Juan Canyon and Western Hills, within a mile of unit 4, 5 and 6. Both areas have similar soils and terrain as these project sites, and both studies mapped areas of unstable soils and debris flows on slopes. There is evidence supporting a fair argument that steep burn sites may pose significant risk of landslide in the event of a wet winter. The document lacks detailed mapping of the specific degree of de-foliation on steep slopes, and thus lacks the information needed to determine if mitigation is adequate.

#23-61

HAZARDOUS MATERIALS

c) Hazardous emissions within one-quarter mile of a school. Contrary to the MND statement, burn unit 4 is within 100 yards of Fox Elementary School. There is potentiallysignificant impact to sensitive receptors at this site. At a minimum the document must disclose this fact and provide mitigations as required by CEQA. #23-62

HYDROLOGY AND WATER QUALITY

a) The report states on pg. 60 *"Broadcast burning can result in an increase in run-off, erosion, and sedimentation, particularly in scrub and grassland vegetation types where fire severity is generally higher and more bare soil occurs following burning."* Yet, no mitigation is offered to address this documented impact. The authors dismiss these impacts with a *false comparison* to a wildfire event, without considering or evaluating the alternative of *no fire* (wildfire reduction methods such as goats, manual removal and home hardening). The report lacks any study of the potential for migration of toxins, burn residue, dust and soil downhill into the adjacent reservoir. #23-63

h) Conflict with water quality control plan. The asserted purpose of the watershed landssurrounding SFPUC's Crystal Springs reservoir is to ensure high quality water and prevent infiltration of contaminants:

> *"Our mission for managing our watersheds is to provide the best environment for the production, collection, and storage of the highest quality water for the City and County of San Francisco and suburban customers. We seek to accomplish this by developing, implementing, and monitoring resource management programs which address all watershed activities. Watershed management programs will apply best management practices for the protection of water and natural resources and their conservation, enhancement, restoration, and maintenance while balancing financial costs and benefits."*
> https://sfwater.org/index.aspx?page=411

Inexplicably, the report states the project has *"no relation to any water quality management plan."* The glaring omission – denial – of the potential impacts upon water quality is striking. The agency does not have enough information to determine what thetrue impact of the project will be and whether the mitigation measures are adequate toreduce those impacts to a less than significant level. #23-64

RECREATION

a) The CCC track is accessed by an estimated 30,000 users on a year-round basis, includingan estimated 17,000 during the cross-country season from August to November. The proposal denies the existence of this use, so provides no mitigation. By limiting the existing recreational use of the CCC track, the project will potentially impact thousands of users who will be diverted to other area trail systems. Nearby Waterdog Open Space,

Pulgas Ridge, Edgewood, Sugarloaf and others are likely to see increased use on thescale of thousands, creating a potentially significant impact. #23-65

#23-66

SUMMARY

Because substantial evidence supports a fair argument of potentially significant adverse impacts of the project, including to aesthetics, air quality, biological resources, geology and soils, water quality and recreation, an EIR is required and the negative declaration should notbe adopted. (See *Quail Botanical Gardens Foundation, Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1601–1602.)

Mitigations offered are vague and **lack enforceable mitigation measures**. Controlled **before and after monitoring is completely lacking**, making it impossible for a third party to monitor or ascertain the success of the project objectives.

Frank and Kristin
Mercer2535 Somerset
Drive
Belmont, CA 94002

SFPUC unit 6, 2009. Poppies have since been eradicated from unit 6 by annual SFPUC disking

TO: Sarah Collamer, CAL FIRE Forester

RE: CAL FIRE Prescribed burn of SFPUC Crystal Springs watershed.

Dear Forester Collamer,

We respectfully submit the following studies and publications as documentation supporting ourcomments regarding the Prescribed Burn of units 3, 4, 5, 6 and 8 of this project.

#24-1

BIOLOGICAL HOTSPOT OF THREATENED SENSITIVE NATURAL COMMUNITIES

These units are comprised of mixed shrub and grassland. Some areas exhibit a high density of native grasses, and some have protected riparian habitats, while others have nearly pristine natural oak woodlands. All harbor endangered species of either plants or animals, and all represent sensitive naturalcommunities. In the bay area how many such pockets remain? Does it make sense to burn our few remaining native habitats when there are so many *alternative, less damaging ways* to *sustainably* manage the fire risk?

Kristi Lazar (Rare Plant Botanist, Botany Data Manager, California Natural Diversity Database (CNDDB), Department of Fish and Wildlife) wrote *"For the two vegetation types of serpentine grassland and purple needlegrass, it is possible to have a vegetation community be sensitive but the species that make up the community may not be rare species by themselves.* ***It is the assemblage that is rare.***"

As you will read in the sources provided below:

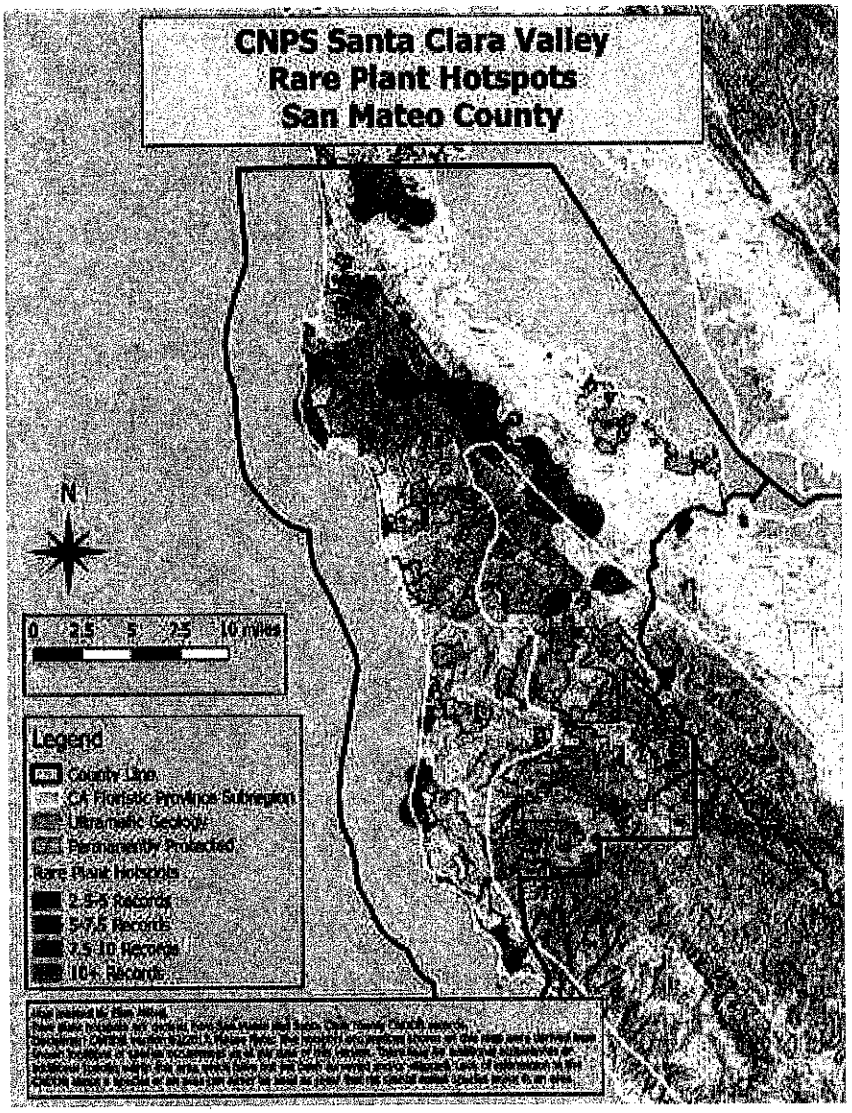
#24-2

1. These SFPUC lands are ranked a biodiversity hotspot, recognized for their significant reservoir of biodiversity which is threatened by human interference, and having already lost 70% of their original habitat
2. There is evidence that these units were likely largely shrub covered, but that burning by indigenous peoples and subsequent grazing converted them to grass. Shrubland is now reclaiming its natural extent. This is a good thing for California since shrubland is shown to be less flammable than grasslands.
3. The damaging fires of recent years have been wind-blown, and there is no evidence that burning *grassland* provides any increased protection during a wind-blown fire. Embers travel miles to ignite in attics and home landscaping. Photos included here show the trees abutting unit 6 homes in Belmont pose a fire risk that cannot be mitigated even by stripping the entire unit of vegetation.
4. Numerous studies have shown that following a burn, invasive grasses return much faster than native grasses, and quickly rebuild the fuel load. For shrubs, out of season burns, as proposed by this project, disadvantage native shrub species that need a longer season to recover.
5. Both these scenarios set up a cycle of more invasives with higher fuel load, requiring annual burns. A regime of **annual burns cumulatively adds to more GHG, not less,** and eventually leads to desertification and increased global warming. This suggests your GHG analysis is flawed.

Rare Plant Hotspots in San Mateo and Santa Clara Counties Elan Alfred, CNPS, 2017
https://www.cnps-scv.org/conservation/rare-plants/322-rare-plant-hotspots

"The Peninsula Watershed Golden Gate Recreational Area and San Bruno Mountain are mountainous hotspots in the Central Coast subregion. Edgewood Natural Preserve and Crystal Springs County Park are associated with an ultramafic corridor in the San Andreas rift zone in SanMateo County."

The map below is a summary figure based on 762 database records and shows where records are clustered in the two counties. The map shows the areas with the highest data point density. Notice that the lands surrounding the Crystal Springs watershed are the highest density rare plant hotspotsin the area.



#24
-3

Fire and Invasive Plants on California Landscapes, Keely, Franklin and D'Antonio, 2011
https://link.springer.com/chapter/10.1007%2F978-94-007-0301-8_8

"The initially "open" (grassland or forbland) habitats created by indigenous burning likely were maintained by intensive livestock grazing during the mission era (Minnich 2008). During the last 100years, fire was apparently used to **convert shrublands to annual grasslands** as the expansion of agriculture in the late 1800s reduced available open lands for grazing (Tyler et al. 2007). "

"The trend of increased presence of woody vegetation on landscapes previously supporting extensive grassland is particularly apparent in the San Francisco Bay area. Contrary to conventional wisdom, this trend is not related to disruption of the natural fire regime by fire suppression, but rather due to a reduction in anthropogenic ignitions and cessation of intensive livestock grazing (Keeley 2005). Thus, this so-called shrubland invasion is perhaps better viewed as a recolonization following the cessation of anthropogenic disturbance, at least for the dominant native shrub, coyotebush (*Baccharis pilularis*)."

"However, as fire intensity decreases, alien invasion increases due to a variety of correlated factors. Lower fire intensity occurs in more open stands with a mixture of grasses and shrubs; thus, they arelikely to have more alien propagules in the soil at the time of fire. **Reduced native recovery has been reported for out-of-season prescribed burns (Keeley 2006b) and this vacuum is always filled with alien species**. The mechanism by which out-of-season burning decreases native plant recoveryis unknown, but it is commonly attributed to prescribed burns during winter or spring that cause heating of seed banks with moist heat, which is often lethal (Parker 1987). Perhaps more importantthough is that winter burning greatly decreases the length of the first growing season. For most seedlings having the growing season reduced from a typical 6 months (following summer or fall burns) to perhaps as little as 1 month (following a winter burn) could limit survival during the ensuing dry summer."

"In a meta-analysis of the outcome of fire management treatments across California grasslands,
Bainbridge and D'Antonio (in prep.; reanalysis of Corbin et al. 2004) found that fire can depress the
abundance of European annual grasses, but **only for the immediate season after fire.**"

#24
-3

Invasive grasses increase fire occurrence and frequency across US ecoregions
Emily J. Fusco, John T. Finn, Jennifer K. Balch, R. Chelsea Nagy, and Bethany A. Bradley
Proceedings of the National Academy of Sciences, 2019; 201908253 DOI: 10.1073/pnas.1908253116

"Nonnative invasive grasses can promote fire, creating new fire regimes that are unsuitable for native species and lead to lower diversity and localized extinctions (1, 2). The altered fire regimes also create favorable conditions for the invasive grasses, which recover and spread quickly postfire, resulting in a "grassfire cycle.""

"Consistent and repeated collection of invasive species abundance information is rare but critical forunderstanding impacts (50) and could improve our models. Therefore, given the nature of these data, our results likely provide a conservative estimate of invasive grass impacts on fire."

"In the regions highlighted by this analysis, we suggest that fire and invasive species managers worktogether to create integrated management plans that account for invasive grass-fire interactions."

Introduced annual grass increases regional fire activity across the arid western USA (1980–2009)

JENNIFER K. BALCH*†, BETHANY A. BRADLEY‡, CARLA M. D'ANTONIO and JOSE´GO´MEZ-DANS

http://people.umass.edu/bethanyb/Balch%20et%20al.%2C%202013%20GCB.pdf

"MODIS records show that 13% of these cheatgrass-dominated lands burned, resulting in a fire return interval of 78 years for any given location within cheatgrass. This proportion was more than double the amount burned across all other vegetation types (range: 0.5–6% burned). Furthermore, multi-date fires that burned across multiple vegetation types were significantly more likely to have started in cheat-grass. Finally, cheatgrass fires showed a strong interannual response to wet years, atrend only weakly observed in native vegetation types. These results demonstrate that cheatgrass invasion has substantially altered the regional fire regime. Although this result has been suspected by managers for decades, this study is the first to document recent cheatgrass-driven fire regimes ata regional scale."

Fremontonia Journal of the California Native Plant Society, April – July 2010

https://www.cnps.org/wp-content/uploads/2018/03/Fremontia_Vol38-No2-3.pdf

Fire on California Landscapes; Jon E. Keeley

"The majority of our landscape is not forested and humans have not reduced fire frequency, but rather have radically increased burning (Halsey 2004). In many places this has had the unfortunate impact of **type converting native shrublands to nonnative grass and forb lands** as outlined by Lambert, D'Antonio, and Dudley in this issue. As a member of the California Native Plant Society, thistype conversion concerns me because of the loss of both native flora and fauna. As an *ecologist* this concerns me because of the change in functional types from deep-rooted shrubs that can hold soils on steep slopes, to shallow rooted herbs. As a *fire scientist* this concerns me because of the change in fire season from about 6 months in shrublands to 12 months in annual grasslands, and lastly as a *scientist* this is of concern due to the loss in the capacity for carbon storage and potential impacts onclimate."

"Rather it is common for homes to burn from embers entering vents or igniting piles of dead leaveson roofs or gutters. Since embers can travel a mile or more, clearance zones are not likely to be highly effective in altering housing losses in

\# 24-3

many instances."

Invasive Species and Fire in California Ecosystems; Adam M. Lambert, Carla M. D'Antonio, and Tom L. Dudley

Most evidence indicates that the strongest impacts of invasive plants on fire regimes in California occur in coastal sage scrub, deserts, and riparian areas. Contrary to common perception, foliar tissuedoes not easily ignite except under super-heated conditions or when leaf tissue moisture is low.
However, several weedy forbs and grasses tend to thrive at the disturbed edges of these shrublandsalong roads, power lines, and fuel breaks where shrubs are removed. The invasive, annual grasses that often colonize these areas dry out much earlier in the spring than the native shrubs, and with their high surface area to volume ratio, are more prone to ignition than the native vegetation. Mediterranean grasses such as *Bromus* species and slender oats (*Avena barbata*) are particularlyimplicated since they act as wicks, spreading fast-moving fire into the canopies of larger shrub vegetation.

Early human inhabitants used fire to reduce woody plant cover and maintain grassland habitats forhunting, and to promote growth of particular species. After Euro-American colonization, grasslandswere maintained by intensive livestock grazing, and fire was used to convert shrublands to grasslands. Prescribed fire has been used as a tool in some invaded grasslands to try to manage against nonnative grasses, but results have been mixed as demonstrated in a metaanalysis
conducted by D'Antonio and Bainbridge (Corbin et al. 2004).

While it appears that a single fire can reduce non-native grasses, this **effect is short-lived,** and only recurrent fire or fire combined with grazing can keep down non-native grasses. At the same time, some nonnative forbs such as species in the genus *Erodium* and black mustard (*Brassica nigra*) are promoted by fire. Thus, the use of fire in grasslands to enhance native species must be carefully done, and consideration of what non-native species are in the local seedbank is a key element. But **overall, fire is not considered a key factor in the maintenance of invasive plant dominance, nor anappropriate management tool for eliminating non-native species in most California grasslands.**

Riparian areas are often considered to be functional barriers to the spread of wildfire (Pettit and Naiman 2007). However, several invasive plants in California riparian systems are changing these dynamics. For example, giant reed (*Arundo donax*) and tamarisk (*Tamarix* spp.) are well known to behighly flammable, yet both species recover rapidly from fire by regrowth from below-ground plant parts. By contrast, **cottonwoods, willows, and other *native* woody plants are much less tolerant of direct exposure to fire**. Recent studies suggest that the invasive plants mentioned above are makingriparian systems fire-prone.

#24
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Taken together these studies suggest the **prescribed burn will not achieve the CAL FIRE stated objectives** of reducing fuel load or reintroducing native species. Had alternatives been considered, asrequired by CEQA in a full EIR, there is significant evidence that far less environmentally damaging methods would be identified to achieve these objectives, while also creating a **more sustainable, permanent reduction of fuel load and increased wildfire resiliency.**

NEED FOR FLORISTIC SURVEY, INDIVIDUALIZED SITE PLANS AND PROJECT ALTERNATIVES

This document includes numerous photos taken recently in unit 6, proving the presence of special status and endangered species not identified in the CAL FIRE survey. Further, your MND report references "confidential SFPUC" plant data not disclosed in the survey. If a plant species is so rare and special that its location is confidential, that raises the question of why CAL FIRE plans to burn the area.

When questioned about this, Kristi Lazar (Rare Plant Botanist, Botany Data Manager, California Natural Diversity Database (CNDDB)) explained:

"It is possible that locals know of a rare species existing on the site but that data has not been reported to the appropriate places (like the CNDDB) or the data may have been reported to the CNDDB but has not yet been added to our database. That is one reason why ***on the ground surveys are extremely important and why the CNDDB shouldn't be used as a substitute for on the ground surveys.*** *For the "confidential SFPUC data", it could be that they just don't want the SFPUC data displayed in a public report if the resources are sensitive."*

#24
-3

US FWS Fire Management and Invasive Plants -A Handbook
https://firesafemarin.org/images/documents/USFWS_FireMgtAndInvasivesPlants_A_Handbook.pdf

"Fuels treatments can involve the complete or partial removal of plant biomass. The greater the percentage of existing vegetation that is removed, **the greater the potential for spread of invasive plants**. For example, cover of invasive plants often increases with the proportion of overstory vegetation that is removed. Also, treatments that involve both fuels thinning and burning can lead to higher invasive plant cover than treatments that include one or the other individually."

"At a minimum, monitoring needs to determine whether objectives of the management action have been achieved."

https://wildlife.ca.gov/Conservation/Survey-Protocols

Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities

https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline State of California Natural Resources Agency Dept of Fish and Wildlife, March 20, 2018

"Special status plants, for the purposes of this document, **include all plants that meet one or more of the following criteria:**

Listed or candidates for listing by the State of California as threatened or endangered under CESA (Fish & G. Code, § 2050 et seq.) "Threatened species" means a native species or subspecies of plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by CESA (Fish & G. Code, § 2067). "Candidate species" means a

native species or subspecies of plantthat the California Fish and Game Commission has formally noticed as being under review by CDFW for addition to either the list of endangered species or the list of threatened species, or a species forwhich the California Fish and Game Commission has published a notice of proposed regulation to add the species to either list (Fish & G. Code, § 2068).

Sensitive natural communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communitiesmay or may not contain special status plants or their habitat. CDFW's *List of California Terrestrial Natural Communities*7 is based on the best available information, and indicates which natural communities are considered sensitive at the current stage of the California vegetation classification effort."

"Impacts to **CRPR 3** plants may warrant consideration under CEQA if sufficient information is available to assess potential impacts to such plants. Impacts to **CRPR 4** plants may warrant consideration under CEQA if cumulative impacts to such plants are significant enough to affect theiroverall rarity.

"Focused surveys" that are limited to habitats known to support special status plants or that are restricted to lists of likely potential special status plants are **not considered floristic in nature and are not adequate to identify all plants in a project area to the level necessary to determine if theyare special status plants."**

"Conduct botanical field surveys by traversing the entire project area to ensure thorough coverage,documenting all plant taxa observed. **Parallel survey transects may be necessary** to ensure thorough survey coverage in some habitats."

"Conduct botanical field surveys in the field at the times of year when plants will be both evidentand identifiable. Usually this is during flowering or fruiting. Space botanical field survey visits throughout the growing season to accurately determine what plants exist in the project area."

#24-3

Taken together these sources provide a framework that should be applied to the analysis of these burnunits. The project analysis requires:

1. A **floristic survey** is required to fully identify ALL species of concern, including those "threatened","considered" and "endangered", as well as "sensitive natural communities."
2. Each site requires a separate analysis, and specifically targeted mitigations applicable to the surveyfindings of that site.
3. Site maps should EXCLUDE non-burn areas. This includes areas with a high density of species of concern (an assemblage), areas surrounding endangered species, riparian habitats, oak woodlands,areas previously burned, and high-quality chaparral. This is the only way for the public to **ensure compliance with the proposed mitigations.**
4. Permanent transects are required, with measurement of before and after species counts, in order toascertain the success of the objective of reducing fuel load and invasive species and restoring nativespecies.
5. Burn plans should clearly specify planned burn season and **demonstrate that the timing of the burn**

#24-4

#24-5

#24-6

#24-7

#24-8

will not kill or disadvantage native species and advantage invasives.] #23-8

6. Burn plans should specifically map and INCLUDE non-native high-fuel trees bordering unit 6, andthroughout all units which pose the real fire risk.] #24-9

Comment #25

Comments on MND – SFPUC Prescribed Burn Project, San Mateo County, CA Mercer, April 5, 2021

Sarah Collamer
VMP Coordinator, Forester I
California Department of Forestry and Fire Protection CZU Resource Management6059 Highway 9
Felton, CA 95018
Email:

sacramentopubliccomment@fire.ca.gov

Dear Ms. Collamer,

> RE: Initial Study MND for the proposed SFPUC Prescribed Burn Project, San MateoCounty, California, Released February 16, 2021. (public comment period extended toMonday April 5th 2021 per Shannon Johnson, CalFire VMP Forester III, March 10, 2021)

I am opposed to the proposed controlled burns, which we are only discussing because Global Warming/Climate Change has made our state hotter and drier and more prone to a longer wildfire season with wildfires that burn hotter. So our State officials naturally want to ally people's fear of wildfire threat to their homes by doing something to mitigate the threat of wildfires. However, our course of action must be well thought out and not simply a knee-jerk reaction to make people feel good that something, anything, is being done. I believe controlledburns are not well thought out, and not the best course of action, or best use of our limited resources to mitigate the threat of wildfire damage.

Global warming/climate change is caused by humans not only spewing too much Greenhouse Gases (GHG), such as carbon dioxide and methane, into our atmosphere but also by destroying natural environments that are carbon gatherers, thereby not only decreasing our planet's ability togather carbon but also releasing the stored carbon from the gatherers, increasing Global Warming/Climate Change. So the irony here is that by destroying the carbon gatherers with a controlled burn, under the guise of mitigating the damage caused by wildfire, you are actually increasing our chances of more wildfire by releasing more carbon into our atmosphere and decreasing our planet's ability to gather carbon, making our state hotter and drier, and our fire season longer and longer. Just as in the past suppressing wildfire was a knee-jerk reaction, that has wrought more problems than it solved, the controlled, and unnecessary, burning of the natural carbon gathering environment will also bring more foreseen and un-foreseen problems than it will solve.

We are mainly concerned with wildfire because we don't want out homes to burn, however weneed to be thoughtful regarding our solutions to protecting our homes. Everyone knows hardening homes is the best solution to prevent them from burning. See attached document.
Engaging in a vicious annual knee-jerk cycle of burning carbon gatherers thereby increasingGlobal Warming/Climate Change and making wildfires, and the threat to

our homes, more imminent is counter to the solution of the problem we all want to addressThe main cause of wildfire threat to homes is flying embers and firebrands, which can fly over amile in windy conditions. See attached document. Accordingly, telling people that controlled burns will make their homes safer gives people a false sense of security into thinking they don't need to harden their homes thereby putting their home, and nearby homes, at risk of wildfire damage from flying embers. Burning less than a thousand acres in this area that is surrounded by thousands of acres of beautiful open space will do very little to nothing to prevent flying embers from starting homes on fire, thereby increasing flying embers and the chances that more homes will also be set on fire.

I'm very impressed with Cal Fire's ability to fight wildfires but very disappointed with their slash and burn migration efforts. All the money that Cal Fire will use for controlled burns shouldbe redirected to hardening homes susceptible to wildfires; the real solution to protecting homes from the threat of wildfires. All agencies must work together and pool their resources to mitigateGlobal Warming/Climate Change and its threatening effects on our homes. Anything less is just bureaucratic posturing.

Pat Cuviello
15 Wakefield Court
Belmont, CA 94002

From: Laurent Gharda [mailto:laurent@gharda.net]
Sent: Monday, April 5, 2021 12:49 PM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Cc: Laurent Gharda <laurent@gharda.net>; Collamer, Sarah@CALFIRE <Sarah.Collamer@fire.ca.gov>; Johnson, Shannon@CALFIRE <Shannon.Johnson@fire.ca.gov>
Subject: Comments on the Mitigated Negative Declaration for the Proposed SFPUC Prescribed Burn Project - Burn Plot #6

Sarah Collamer
VMP Coordinator, Forester I
California Department of Forestry and Fire Protection
CZU Resource Management
6059 Highway 9
Felton, CA 95018
Phone: (831) 224-1215
Email: sacramentopubliccomment@fire.ca.gov

Hello Sarah,

I am a Belmont resident living 1/8 of a mile away from Burn Plot #6.

I've read the MND and attended the recent Zoom call in late March.

While I support the overall plan, I am concerned that several issues of concern were not documented:

- Scope of the burn: there are numerous, health coastal live oaks. Based on how the MND is worded, these will all be removed. During the Zoom meeting it was stated that not all vegetation within a prescribed burn area would be removed. This is inconsistent with the MND...
- Timing of the burn: the document states that up to 200 acres will be burned per year. Plot #6 is 199 acres.
    - Will the burn happen all at once? Rich said no, but the MND doesn't state so.
- The MND stated that all parties who needed to be made aware of this had been notified. This is not correct.
    - Dozens of residents bordering Zone #6 got no notification
    - Elected Officials didn't know about this (I notified Mayor Charles Stone who confirmed as much, before he reached out to Rich Sampson)
    - San Mateo Consolidated Fire Department (Belmont, Foster City and San Mateo) were not aware of the plan
    - I found out only because a resident spotted a single 8 ½ x 11 sheet of paper inside the Crystal Springs Cross Country Course with the notification (this was pretty much hidden from the public)
- The CSCCC is used by thousands of students from dozens of schools in the area for cross country races. How will the burn impact their schedules? Will the current trails be preserved and will the burn planning take steps to mitigate the impact of the burn on the course? If the burn happens all at once, how many weeks/months will it be unavailable for student runners?

#26-1
#26-2
#26-3
#26-4
#26-5

If I understood correctly, Rich said that the issues were not to be of concern and that they may be documented in further documents but that these new documents would not be open to public comment.

Because of this, I think it is appropriate to have the MND revised to address these issues and that a revised MND be released for public comment.

Thank you,

Laurent

Laurent Gharda
14 Somerset Ct.
Belmont, CA 94002
+1 (650) 520-9549 (m)

#26-6

April 5, 2021

Sarah Collamer
California Department of Forestry and Fire
ProtectionFelton, CA 95018

Subject: public comments on Initial Study-Mitigated Negative Declaration (MND) for theproposed SFPUC Prescribed Burn Project San Mateo County, California

sent via email: sacramentopubliccomment@fire.ca.gov

Dear Ms. Collamer and Chief Sampson,

I request that the Department mail Notices of Intent of the upcoming revised MND to all residences adjacent to or near the proposed burn sites. I request to be put on the Department's NOI list for this and all Department actions near my home in Belmont Heights. Most residentsremain unaware of the proposal to burn these areas.

#27-1

The MND states the Project Objectives are:

1. Create or maintain areas of **reduced vegetation with the goal to reduce fuel loading** and woody fuel continuity where firefighting tactics can be more successful, **thereby increasing the safety of neighborhoods near the SFPUC Watershed.**

2. maintaining existing native grasslands **by slowing shrub encroachment and potentially restoring some areas of shrub encroachment to open native grassland**

3. **Train CAL FIRE personnel** in firing and control techniques.

I. California Environmental Quality Act

The purpose of California Environmental Quality Act (CEQA) is to prevent or minimize damageto the environment through development of project alternatives, mitigation measures, and mitigation monitoring. The Department of Forestry is required to consider alternative actions thatwould minimize damage to the environment. The Department must take a hard look at the content, data and information submitted via public comments to determine whether alternative actions may be taken to achieve the claimed objectives of the proposed action.

#27-2

The current MND fails to adequately disclose endangered and threated species in the project location, provide accurate information about the project location, consider and evaluate potentialenvironmental effects that could result from the proposed action and consider alternative actionsthat would work towards the cited goals. Because the proposed action includes a precedent- setting action of burning watershed lands near to or adjacent to an urban neighborhood (Plots 4, 5 and 6), an EIR is needed to conduct in-depth studies of potential impacts, measures to reduce or avoid those impacts, and an analysis of alternatives to the project.

CEQA Guidelines §15070 states a Negative Declaration or Mitigated Negative Declaration maybe prepared when:

> *The initial study shows that there is* ***no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment****, or The initial study identifies potentially significant effects,* ***but****:(1)* ***Revisions in the project plans*** *or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review* ***would avoid the effects or mitigate the effects to a point where clearlyno significant effects would occur****, and (2)* ***There is no substantial evidence, in lightof the whole record before the agency, that the project as revised may have a significant effect on the environment****.*

#27-2

CEQA § 21080 states, "If there is substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment, an **environmentalimpact report shall be prepared**." CEQA also states, "**substantial evidence includes fact**" or "**a reasonable assumption predicated upon fact**."[1]

The inadequacies in the MND and comments herein outline that there is a reasonable assumptionpredicated upon fact (or substantial evidence) that the project may have a significant effect on the environment and therefore an Environmental Impact Report must be prepared.

II. MND Stated Goal 1: Increasing the Safety of Neighborhoods Near SFPUC Watershed

Goal one appears to be largely designated for Plots 4 and 6 (and Plot 8 which has a small numberof adjacent homes). Plots 3, 5 and 7 are not near neighborhoods and therefore this objective doesnot apply.

Regarding Plots 4 and 6, as stated in the MND, "SFPUC currently undertakes fuel reduction activities, such as mowing, disking and mastication." Given SFPUC wildfire mitigation actionswhich have been ongoing for decades, Plots 4 and 6 have well-established existing firebreaks which exceed the 100-foot recommendation. Additionally, the Watershed (Plot 6) behind the Belmont Heights neighborhood is largely a running course with wide dirt trails providing additional firebreak areas. For Plots 4 and 6, adjacent areas to the mowed/disked firebreak is sparce vegetation largely comprised of grass which could be mowed if necessary.

#27-3

The MND fails to state that a wider firebreak is needed to protect homes. The MND fails toconsider widening the mowed firebreak in order to mitigate the a more extreme, environmentally-destructive action of burning the entire area to achieve the stated goal of increasing the safety of the neighborhood. The majority of vegetation in Plots 4 and 6 is sufficiently distanced from homes on St. James Road and Hallmark Drive as per Californiarecommendations and requirements.

[1] For the purposes of this section and this division, **substantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact**.

The MND fails to analyze scenarios how a wildfire is to spread to the Neighborhood – a necessary component to determine whether the drastic burn proposal is truly the least environmentally harmful action that could achieve the stated desired objective. The MND must(and in its current form fails to) consider that if a wildfire were to occur in Plots 4 or 6 it wouldlikely be caused by activities on Highway 280. Yet the MND fails to consider mowing a 100- foot firebreak along Highway 280 to prevent a wildfire from spreading to the Neighborhood.
Flying embers could also cause a wildfire to occur in the Watershed; however, similar flying embers could also ignite homes given that most homes in the Neighborhood have not been hardened largely because the State is not focused on making *homes* safer, but rather focuses oneliminating native habitat.

#27-3

The MND fails to outline any rationale or data that supports the selection of Plots 4 and 6 for theproposed action rather that other areas that are adjacent to urban neighborhoods. The lack of dataindicates the selection to be arbitrary and this is insufficient to implement such a precedent- setting burn in the area. There is no historic practice of conducting a prescribed burn behind homes in this area and none has occurred on these plots. Due to the controversial nature of this burn and the precedent-setting nature of this proposed action, an EIR is needed to determine thatthis extreme action is necessary to achieve the stated objective(s). There are many SFPUC Watershed lands and other open spaces that are adjacent to urban neighborhoods throughout the Peninsula which are not targeted for prescribed burns. Indeed, it would be impossible to target toburn all open spaces adjacent to all neighborhoods in the Bay Area or the region.

The MND fails to consider alternative actions that would Increase Neighborhood Safety and have less of a negative impact on the environment including but not limited to the facts that the prescribed burn will destroy native chaparral and sage scrub plant communities, likely kill nativewildlife (including reptiles, endangered woodrats, ground-dwelling animals), contribute to CO2 emissions and destroy the natural esthetic beauty of the Watershed's native plant communities which I have come to love and cherish. I have lived in this area for most of the past 40 years, I will be harmed if this proposed action is implemented for the above-mentioned reasons.

III. MND Stated Goal 2: Slowing Shrub Encroachment; Restoring Shrub Encroachment to Open Native Grasslands.

#27-4

A. MND Outlines Intention to Convert Chaparral and Sage Scrub Communities to Grasslands

The MND has outlined the Department's intention to kill and convert chaparral and sage shrubs to grasslands: "pretreatment involves **killing some or all shrub species** in a unit" and "**crushing stands of shrubs** by driving a bulldozer with its blade lifted through stands" and "limited amounts of **brush may be pretreated by herbicide application and/or by cutting with chainsaws**" and "**Hand crews utilizing chainsaws will cut and remove woody material** (both living and dead)"...

Clearly the MND intention is "**maintaining**" and "**restoring some areas of shrub encroachment to open native grassland.**"

The MND refers to chaparral and sage scrub plant communities as "shrub" and "woody material." Coyote brush is a predominate plant in most chaparral communities. Plots 4 and 6 arethriving chaparral plant communities – with a variety of associated plants scattered throughout --including lupin, manzanitas, sage and others. Chaparral community plants are symbiotic and native; yet the MND refers to them as "woody materials" or "shrubs" and as something to be eradicated. All plots included in the proposed action (with the exception of the Skyline plot) are native chaparral and sage scrub plant communities.

#27-4

Coyote brush and Lupin are common chaparral plants – living on ridges, slopes, canyons, coastalscrub. These are symbiotic plants that support a host of native species including the Mission Blue Butterfly which I have observed in the area.

The MND notes Schirokauer et al (2003) could not map ***native*** grasslands and instead mapped 'grasslands' on the Peninsula Watershed as "California Annual Grasslands." This designation as "grasslands" clearly does not indicate these are native species. The MND is incorrect to state that"these areas have a component of, **or are dominated by**, native bunchgrass vegetation (primarily needlegrass, *Stipa* sp. and *Danthonia californica*), and would be considered native grassland based on currently accepted definitions (>10% cover native grass species)." That is simply not true for the "grasslands" in Plots 4 and 6. While there are native grasses in the chaparral communities – it would not qualify as "grasslands."

#27-5

The primary "grass" found in Plots 4 and 6 are cheatgrass. Cheatgrass was introduced in the western United States in the 1800s. The Cheatgrass invasion is connected to the expansion oflivestock grazing which largely destroyed ecological conditions by overgrazing which contributed the fast invasion of the non-native grass.[2]

The MND has factually inaccurate information regarding the historic and current composition ofPlots 4 and 6. The MND states, "Substantial areas dominated by **grassland** occur through the project area. **Some areas include exotics** such as French broom (*Genista monspessulana*), Monterey pine and eucalyptus. A limited amount of dense oak woodland also is found here."

Firstly, Plots 4 and 6 do have exotics – a limited number of pine trees and cheatgrass – no (or very little) French broom. The MND fails to consider removing the exotic pine trees and mowingcheatgrass as a less extreme action to achieve the stated objective. Cheatgrass is more pervasive in areas of Plot 6 likely due to human usage of the running course. Outside of the running course area in Plot 6 and throughout the majority of Plot 4 the majority of habitat is native chaparral andsage scrub plant communities – the very communities that CPR 4483 intended to protect. More on CPR 4483 below. It is well established that human disturbance is the cause for the expansion of cheatgrass throughout the area (and country).

#27-6

B. MND directly violates CPR 4483.

California Public Resources Code 4483 states:

[2] http://www.columbia.edu/itc/cerc/danoff-burg/invasion_bio/inv_spp_summ/Bromus_tectorum.html

*(b) (1) It is the **intent of the Legislature that additional consideration be provided for chaparral and coastal sage scrub plant communities** that are being increasingly threatened by fire frequency in excess of their natural fire return patterns due to climate change and human-caused fires.*

(2) Prescribed burning, mastication, herbicide application, mechanical thinning, or other vegetative treatments of chaparral or sage scrub shall occur only if the department finds that the activity will not cause "type conversion" away from thechaparral and coastal sage scrub currently on site.

(3) This subdivision shall be in addition to the requirements in the VegetationTreatment Program Programmatic Environmental Impact Report.

#27-6

The "wood material" or "shrubs" or "brush" that is referred to throughout the MND is largely coyote brush which is a founding component of the chaparral community. Sage scrub plant communities are throughout Plots 4 and 6 and they are also to be protected from conversion to"grasslands." The MND fails to consider CPR 4483 and fails to adhere to the CPR's mandatethat killing the "brush" will not convert the habitat away from the chaparral and coastal sage scrub currently on the site.

C. MND Inaccurately Claims "Historic" "Grassland" Status for Proposed Sites:

The MND states:

Historical analysis, including analysis of historical photos, indicates that many areas of the project east of the San Andreas fault were dominated by coastal prairie or oak savannah, with some areas eventually becoming shrub dominated due to the lack of disturbance such as fire.

#27-7

The Department provided the following information:

*One of the goals of this project is to provide improved habitat for wildlife, as **so much of the watershed has remained in a stagnant state**. **Disturbance** **in the landscape creates more grassland** and higher light conditions, which are required by many animals and plants. **Historic photos of San Mateo show** **an open coastal prairie**, **with few trees or brush**.*

The MND fails to provide supporting data or the meaning behind the claim "so much of the watershed has remained in a stagnant state." The MND fails to consider that the current chaparraland sage scrub communities in the proposed site areas are thriving native plant communities that support a whole host of native wildlife. The MND fails to consider targeting non-native plants in order to further support the naturally-occurring native habitat. The MND fails to acknowledge that coyote brush, chaparral community and sage brush are desirable native habitat – instead the MND addresses these important native communities instead refer to them as "stagnant" and that "disturbance" – through burns, chain-sawing, herbicides and other mastication methodologies – will create "more grassland." The MND fails to consider that destroying native plants for more "grassland and higher light conditions" will accelerate the expansion of invasive non-native weeds including cheat grass which is more flammable than the current native plant communities.

The MND inaccurately claims that "historic photos of San Mateo show an open coastal prairie, with few trees or brush." The MND further states, "San Andreas fault were dominated by coastalprairie or oak savannah, with some areas eventually becoming shrub dominated due to the lack of disturbance such as fire."

The Department held an informal public meeting on March 24, 2021 to provide local residents information about the proposed action and to answer questions. (Attachment 1) During this call the Department showed a "historic" photo of the area from the mid-1900's (approximately 1949)which depicted barren open space. This photo, and other Departmental communications with citizens, promotes the idea that the proposed sites were once "grasslands" and did not have chaparral and sage scrub communities as currently exist. (Plot 7 is the exception given it is located in the Santa Cruz Mountains). #27-7

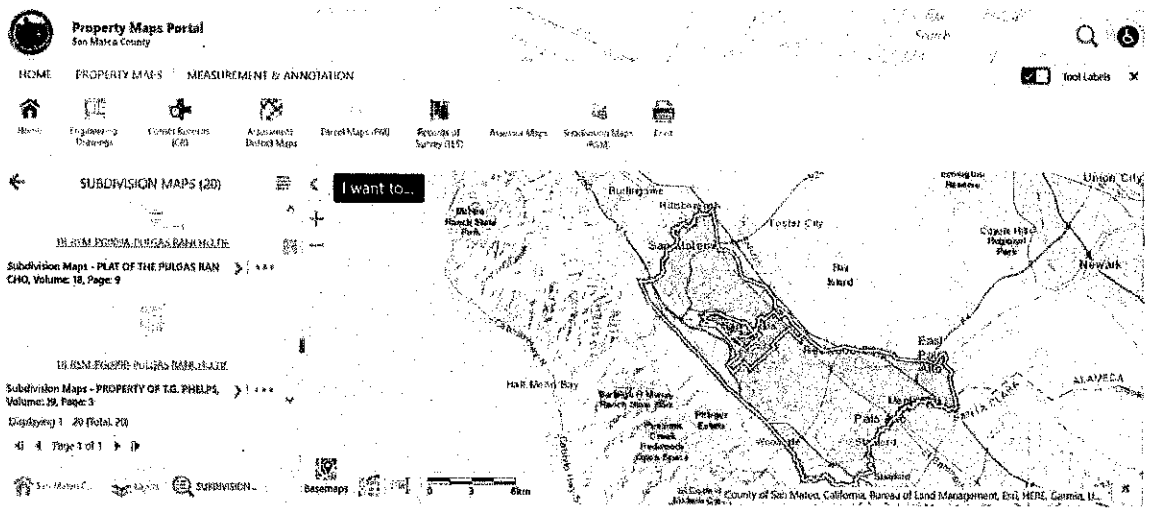
The MND fails to acknowledge the impacts that human usage has had on the proposed site locations and the human-caused destruction to native plant communities. Below are Property Maps filed with the County of San Mateo that outline that the Pulgas Rancho consumed a largeportion of the Peninsula – including Plots 3 – 7 – in the 1800's and later dairy operations occurred on the Diablo Creek Parcels in what is today Belmont Heights (see maps below).

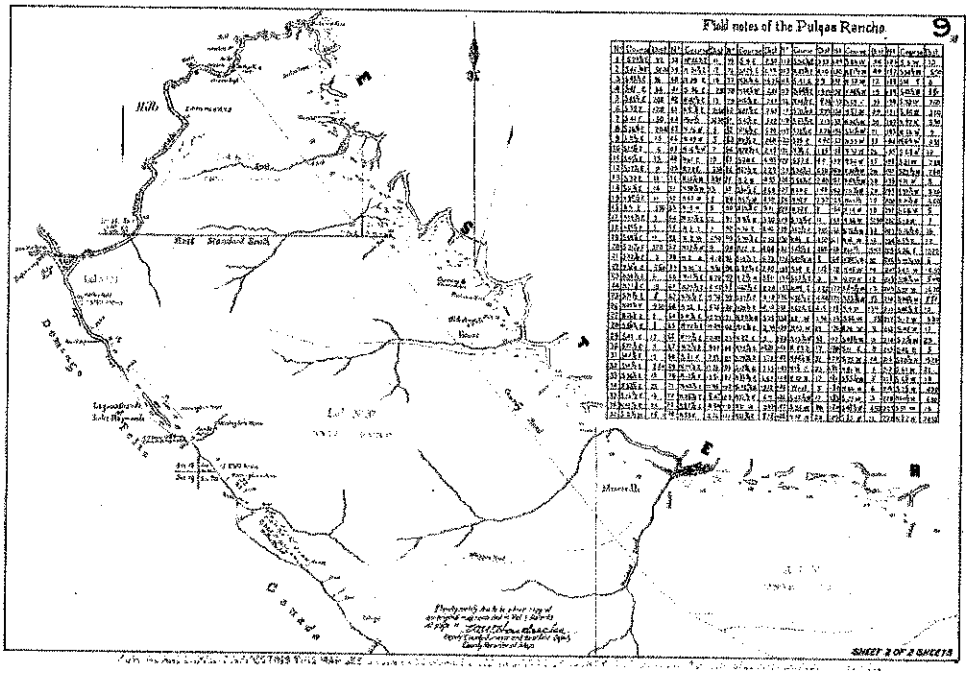
In the 1800's settlers brought cattle to the Peninsula where livestock predominated the landscape.Livestock operations during this time period are well documented as overgrazing and destroying native habitats – converting oak woodlands and other native California flora over to barren areas that were vulnerable to invasive exotic species including, but not limited to, cheatgrass. The MND fails to consider that the historic photos from the mid-20th century were of livestock destroyed native habitat – no native coastal grasslands and proposes to return the recovering landscape to the landscape that was the result of the destruction of the livestock industry.

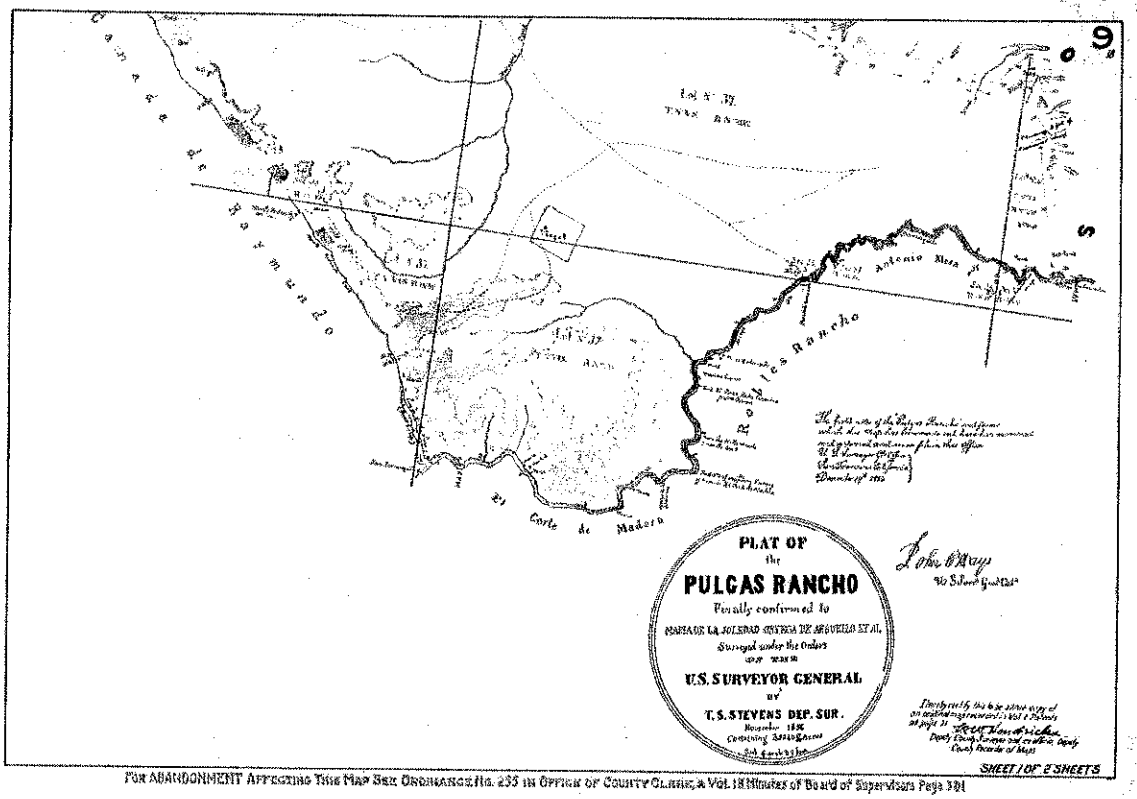
Further, historical data shows that California Indians set fires for the purpose of clearing groundto facilitate hunting and the gathering of acorns and seeds (Anderson 2005; Blackburn and Anderson 1993). Native burning was not done to benefit the native plant communities but to make gathering food and other necessities easier.

Following are (1) the Pulgas Rancho property footprint is overlapped on a current map; (2) Pulgas Rancho north; (3) Pulgas Rancho south; (4) Diablo Creek Parcel (in Belmont Heights).

#27
-7

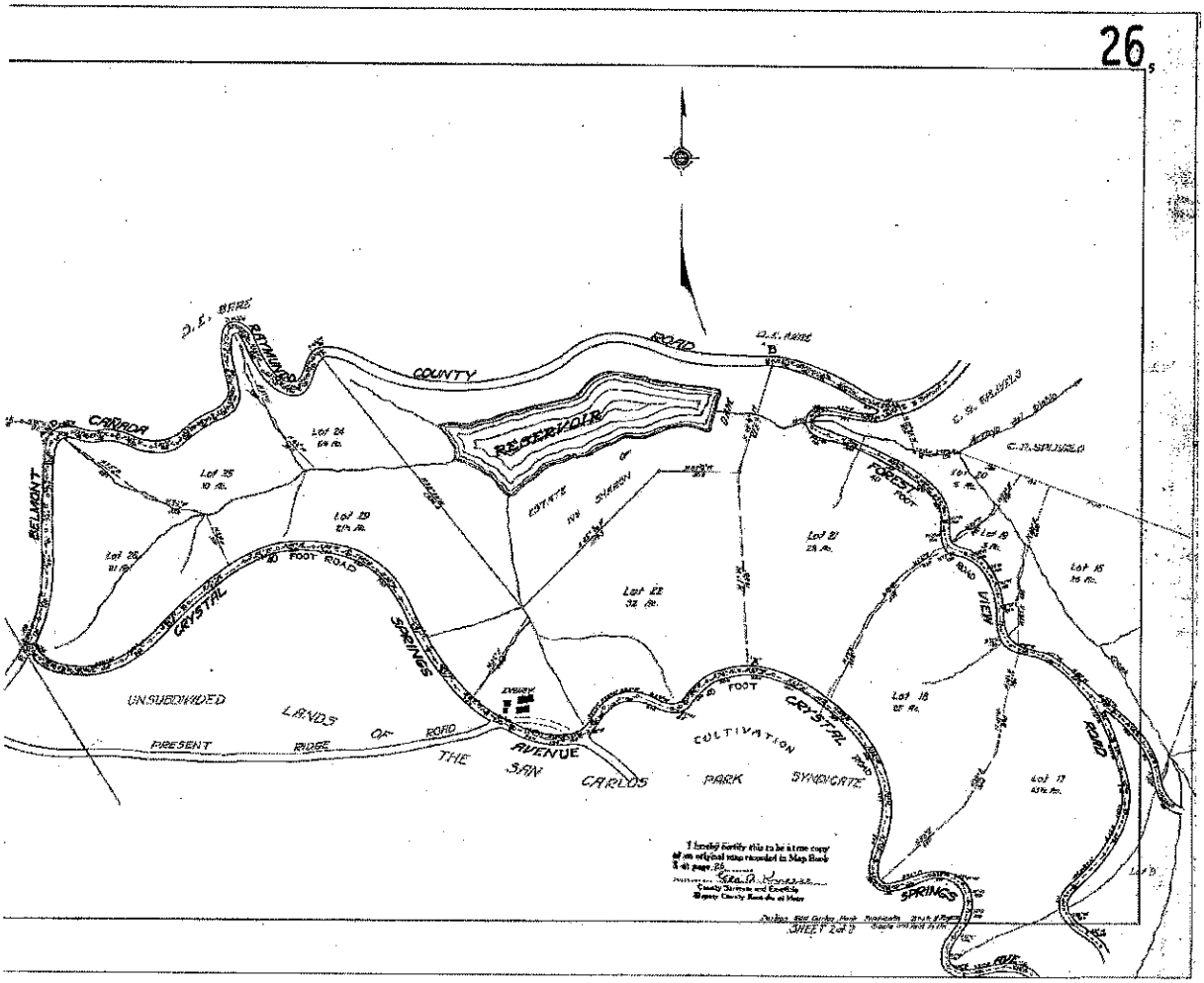






FOR ABANDONMENT AFFECTING THIS MAP SEE ORDINANCE No. 235 IN OFFICE OF COUNTY CLERK, & VOL. 18 MINUTES OF BOARD OF SUPERVISORS PAGE 391

#27
-7



#27-7

The above map of the Diablo Creek Parcel shows a Dairy very near to the location of my homeon Wakefield Court.

The landscape we see today is the complex result of extensive human management. Land use practices intensified over time, directly impacting the abundance and distribution of native chaparral and sage communities and oak woodlands. The MND fails to consider these importanthistorical facts and bases its desired goal on inaccurate historic information.

IV. MND Stated Goal 3: Train Cal Fire Personnel

#27-8

The MND fails to provide sufficient information or rationale to support this as a goal. The MNDfails to consider alternative burning activities to train personnel such: (a) as cutting down non- native invasive trees (pines or eucalyptus) and practice burning such tree piles; or (b) conductingsmall grass burns on invasive non-native weeds on small one-acre parcels. The MND fails to provide sufficient data or analysis to support conducting these extreme burns primarily to train personnel.

V. MND Fails to Consider Adverse Impacts on Aesthetics

The MND fails to address that burned landscape is viewed by many, including me, to be aesthetically destructive. The Watershed has for decades been a place of beauty and home to wildlife – jackrabbits, hawks, owls, deer, bobcats, quail, mission blue butterflies, reptiles and many other native wildlife. Courts have agreed that holding that residents' opinions on aestheticscan support a fair argument for a significant impact. *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903 [lay opinion can support a fair argument].

#27-9

As the public agency, it is the Department's duty to consider all evidence under the fair argumentstandard. The MND fails to consider these impacts and instead claims that impacts are not lasting
– yet we know it will take decades for the chaparral communities to re-establish to their currentstate. Merely because plants will regrow does not rectify the destruction that will occur throughthe proposed action and the negative impacts to the aesthetic qualities of the Watershed in Plots3, 4, 5, 6, and 8.

VI. MND Fails to Consider Cumulative Impacts

The MND states:

> *As long as areas of dense shrub cover are maintained over a landscape, prescribed understory fires in oak woodland are unlikely to significantly alter dusky-footed woodratpopulations (Lee and Tietje 2005). Moreover, the intent of the proposed project is to reduce the risk of large catastrophic wildfires that would have even more severe effects on woodrats and other wildlife. Dusky-footed woodrats are common to abundant where suitable habitat occurs, and most habitat within the range of the San Francisco subspecies is protected by regional park and open space organizations (e.g., East Bay Regional Park District, Midpeninsula Regional Open Space District, Peninsula Open Space Trust, Santa Clara Valley Open Space Authority). For these reasons, and with implementation of Mitigation Measure #12, the project would have a less than significant impact on San Francisco dusky-footed woodrat.*

#27-10

The MND fails to consider cumulative actions and impacts on endangered and threatened species
– including but not limited to the dusky-footed woodrat population. Locally, we have seen massive destruction of woodlands underbrush exposing woodrat nests – making them uninhabitable. Cumulatively wildlife is losing habitat at an unprecedented rate – first from natural wildfire and now from human-destruction of native habitat. The MND fails to considerthe impacts on the Dusky-footed woodrat and other threatened and endangered species (including but not limited to the Mission blue butterfly) by the massive habitat destruction, including the proposed action, which is occurring throughout the state. This is all occurring without any site-specific analysis.

VII. Conclusion

I request that the MND be revised to address reduce the scale and scope of the proposed action to address issues raised in this letter or an EIR is prepared to adequately analyze impacts of the

proposed action and alternatives to minimize the negative impacts to the environment. The current MND has erroneous information about the lack of a school in proximity to the proposedsites and that no recreational activities occur on the proposed sites.

#27
-11

Thank
you.
Deniz
Bolbol
15 Wakefield Court
Belmont, CA 94002
Tel: 650.248.4489

From: mimi36626@aol.com [mailto:mimi36626@aol.com]
Sent: Monday, April 5, 2021 1:26 PM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Cc: commission@sfwater.org
Subject: Re:CalFire burn of Watershed Cross Country Course

Subject:Re: CalFire burn of Watershed Cross Country Course

As a resident of Belmont in San Mateo County, I am writing of concerns regarding the proposed burn by Calfire of 385 acres in our area of Belmont Heights. I believe this to be an ill-conceived plan that instead of increasing fire protection, in fact does the opposite and increases potential for fire and will also destroy vital plant and wildlife including endangered species.

There are several important omissions in this proposal by CalFire. The plan fails to mention the school (Fox Elementary School) located closely to the burn area, the 500 hundred residents whose property is adjacent to the burn area and the Cross Country Course within the burn area itself. Aside from the dangers of a change in the wind during a burn, there is also the impact of lingering smoke left in the air following the burn.

#28-1

Supposedly, the purpose of the burn is for fire safety. However the report states that existing mowing and the firebreak are adequate fire prevention. So why should there be a burn at all?

#28-2

Moreover, there is significant evidence that shows grass to be more flammable than the native chaparral. Burning would also allow more of the invasive species to take hold and those grasses would grow again every year. Now CalFire would need to come back year after year to keep burning. Is that the plan?

#28-3

Obviously, the burn would kill wildlife. This would include woodrats which are vital to the ecosystem and species of plants (i.e. Lupine) on which the endangered Blue Butterfly is dependent. These would be significant losses affecting the sustainability of our woodlands and further the extinction of already endangered species.

#28-4

Altogether, there are numerous errors and omissions in this plan. It would appear, in fact, that the real reason for this proposal is to give trainees an opportunity to burn something. Adding insult to injury, the plan does not

#28-5

even require that residents along the property line be given direct notification of burn days.

I am requesting that a much more detailed and inclusive MND proposal be considered and rewritten before taking action on this plan which I believe is unnecessary, dangerous and has not been well thought out.

Thank you for your consideration.

#28
-5

Mimi Iversen
Five Soho Circle
Belmont, CA 94002

SIERRA CLUB
LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

April 5, 2021

To: Sarah Collamer
VMP Coordinator, Forester I
California Department of Forestry and Fire Protection
CZU Resource Management
6059 Highway 9
Felton, CA 95018
Phone: (831) 224-1215

RE: Comments on the "Initial Study-Mitigated Negative Declaration for the Proposed SFPUC Prescribed Burn Project"

Dear Ms. Collamer,

The Sierra Club Loma Prieta Chapter (San Mateo, Santa Clara and San Benito Counties) has a long and focused interest in protecting the unique environment of the San Francisco Public Utilities Commission's Crystal Springs Watershed.

We do have several reservations about the "Prescribed Burn Project" being analyzed as a Mitigated Negative Declaration (MND) and we write to ask that an Environmental Impact Report (EIR) be conducted instead, in which the 1969 Scenic Easement (attached) - as signed by the State of California, City and County of San Francisco, San Francisco Public Utilities Commission, County of San Mateo, and the United States Department of the Interior - **be recognized as a controlling document**. Our then attorney, Sidney Liebes, acting also on behalf of the Committee for Green Foothills, played a significant role in bringing this Easement (see attached) to fruition and we are committed to ensuring its relevance. Please note the easement says, "Except as required to accomplish the purposes and uses herein permitted to Grantor there shall be no cutting or permitting of cutting, destroying or removing any timber or brush without the concurrence in writing by a regional representative of the Department of the Interior to be designated by the Secretary of the Interior."

#29-1

An Environmental Impact Report would examine alternatives - one of which could be the usage of goat grazing rather than controlled burns. Goats are a proven technique for reducing fire on landscapes, so much so that goat thefts are up statewide. They also reseed and declump the area when they excrete. Half Moon Bay has adopted goat grazing for sensitive areas and their process has been sophisticated to avoid

#29-2

consumption of indicator species. Goats are an alternative that aren't analyzed in this Mitigated Negative Declaration.

#29-2

We take issue with a number of claims of mitigating fire risks for high density human population based on controlled burns from a cursory reading of the current fire situation in California. These issues can be resolved with a full EIR that also informs policy makers of the best alternatives available. The MND says that this particular controlled burn is a way of preventing fire for the communities east of the SFPUC lands for Crystal Springs. There are a number of problems with the claim.

#29-3

First, the main cause of fires at the Wildlands Urban Interface is not the **remaining undisturbed landscape** but the intrusion of human infrastructure primarily roads and power lines into the landscape as the LA Times and other publication have reported a number of times. The reason firefighting resources are committed is not to save the landscape from the fire but to save the intruded human lives from the fire. The solution is to eliminate these intrusions by not developing further at the interface, reducing presence at the interface, removing roads and power lines, hardening remaining human structures that cannot be removed, ensuring feasible evacuation routes, and implementing defensive spaces against fires. None of these real solutions are being implemented, planned for funding, developed for feasibility, or mentioned in the MND. Controlled burns need to part of comprehensive policy to expanding disaster within the new normal, not an isolated policy matchstick in the unrecognized tinder.

The MND says that "Burn Units were chosen adjacent to roads, trails and existing disk lines to limit the amount of control line that must be constructed." Human infrastructure such as roads and power lines are a leading cause of fires. The MND doesn't state how the controlled burns will help or increase risk in the area. What the statement implies is that the worsening fire situation in California is to be addressed by a business-as-usual response from CDF.

#29-4

Second, the process of fires in California has changed with the changing climate. Today we get largely wind driven fires in California. In this particular landscape high winds are common on a summer evening. Wind caused fires such as the Camp Fire have jumped barriers like controlled burns; other deadly California fires have recently jumped freeway barriers to torch adjacent communities. Why that wouldn't happen in this windy corridor is not explained in the MND, though the impact of wind on the controlled burn is mentioned. This particular controlled burn needs to say how it will prevent fire for the communities east of the SFPUC lands for Crystal Springs from the high winds common in the area.

#29-5

Third, nitrogen deposition from burning fossil fuels in internal combustion engines on HWy280 are the primary cause of tall invasive grasses on serpentine soils in this particular landscape. They have shaded out native grasses and food sources extirpating species like the checkerspot butterfly. The solution is to remove nitrogen deposition from the landscape to control flammable grasses. At Edgewood Park in

Redwood City this is done by penned in goats and volunteers for the Native Plant Society. Making Highway 280 an electric vehicle only highway in these serpentine soil stretches would solve the invasive grass growth from exhaust nitrogen. The result would be that native plant species that make up the diet and habitat of the red legged frog, garter snake, dusty footed rat, nesting blue birds and raptors would be also improved.

#29-5

These lands - as written in the MND - "are some of the last remaining wildlands in San Mateo County". Elsewhere it's called a "biodiversity hotspot." Yet there is no indication how the controlled burn will support maintaining the wildlands status of these lands. If anything, the "pretreated by herbicide application and/or by cutting with chainsaws" and "Dozer lines are created by utilizing a bulldozer to remove all vegetation along the line, only allowing bare mineral soil to remain" further degrades the wildlands to desertified anthropocene landscapes. Increased human presence in once upon a time wildlands is a recognized cause of wildfires.

#29-6

Instead, the landscape is tending toward desertification - a problem that humans have worsened on the American landscape over the last 300 years. The MND states "Repeated short fire return intervals (<10 years) deplete the seedbank of these species without allowing them to grow to maturity where they can reproduce and replenish the seedbank. Over time, repeated short fire return intervals may result in extirpation of these obligate seeder shrub species if they occur in the project area." There is no indication how extirpation will be avoided for both the plants identified and the species that feed on them. Decreasing biodiversity in landscapes is a credible cause of wildfire intensity.

Controlled burns are being introduced when these species are in decline across this iconic landscape. The checkerspot butterfly for example has been extirpated in recent years in this area. Fire adds to already wobbly populations and could push the species into irreversible decline. If fire is regularly introduced to the landscape the deteriorated native plant population will be extirpated over the years. Species population maintenance or revival and their impact on reducing fire on a landscape is not addressed in the MND. Neither are invasive grasses. The MND does address relocating threatened species when encountered. Reducing biodiversity leads to increase desertification and dryer conditions that attracts fire.

#29-7

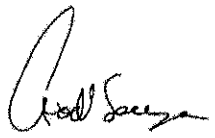
The MND discusses endangered species such as the red legged frog and San Francisco garter snake but doesn't say how their resident population will be aided by the controlled burns. Larger species such as the grey fox and California cougar and the deer that are its primary diet aren't mentioned. The MND does not discuss the present decline in these species and how the continued decline will be aided or benefited from the controlled burn. Instead, the MND offers a hypothetical statement "By returning fire to the landscape, this project may also positively impact organisms that are adapted to fire". There is no evidence supplied here to gauge the value of this statement though history unfortunately would lead us imply otherwise.

Sierra Club says we need to restore native grasslands, wetlands, and forests **to remove carbon from the atmosphere**. We also claim that controlled burns have their place in an ecology where the hydrologic cycle maintains the fog belt and the permeability of the living soil on Peninsula hillside both of which are currently severely compromised along with the biodiversity of the landscape. Further desertification we claim expands the problem. Controlled burns cannot be looked as one tool solution to the many facets of fire from the deteriorating climate. #29-7

To summarize, the result of these burns will be to extirpate native species while allowing invasive fire-spreading-grasses to proliferate because of the unaddressed nitrogen deposition, from HWY 280, thus increasing risk in the corridor. These controlled burns do not address the issue of risk mitigation for homeowners east of the SFPUC property because wind driven fires in CA have jumped man made barriers and burned home that haven't been hardened or located within defensible spaces. After considering the questions raised by the MND the prospect of wildfires does not appear to be diminished. In particular this controlled burn threatens the uniqueness of a view shed that is controlled by the 1969 Scenic Easement attached. An EIR recognizing the Scenic Easement would help answer these questions and concerns. Please undertake one. #29-8

Thank you for extending the time for comments.

Regards,



Gladwyn d'Souza
Chair, Conservation Committee, Sierra Club Loma Prieta Chapter
650-804-8225

https://www.sierraclub.org/loma-prieta/conservation
The bay will be saved when we can eat from it.

Cc: James Eggers, Director, Sierra Club Loma Prieta Chapter

From: Sonya Foree [mailto:outlook_DC7B7D13737D6A85@outlook.com]
Sent: Monday, April 5, 2021 3:47 PM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Subject: SFPUC Prescribed Burn Project MND SCH # 2021020321 Comments on MND

PLEASE CONSIDER THE FOLLOWING CHANGES TO THE MND TO PROTECT FEDERALLY ENDANGERED MISSION BUE BUTTERFLY HABITAT ON THE CRYSTAL SPRINGS WATERSHED

Page 25

Mitigation Measure #6: Survey for and Avoid Occupied Mission Blue Butterfly Host Plants.

If host plant locations are documented inside proposed burn areas, they will either be avoided or surveyed. For locations that are avoided no project activities shall occur within 25 feet of the outer perimeter of the host plants. For locations that are surveyed these locations will be thoroughly surveyed once every two weeks for the presence of Mission blue butterfly eggs and larvae (including evidence of larval feeding) March thru June. Surveys shall be conducted by qualified biologists with demonstrated field experience identifying all MBB life stages. If no eggs or larvae are found at a given host plant location, the location shall be considered unoccupied for that year and project activities may commence in the fall without implementing avoidance measures. All unoccupied locations must be resurveyed for Mission blue butterfly eggs and larvae in subsequent burn years (i.e., the "unoccupied" status is only valid for the year in which the survey is conducted). Host plant locations at which eggs and/or larvae are found shall be considered occupied for that year and no project activities shall occur within 25 feet of the outer perimeter of the location. This distance is expected to be large enough to protect larvae because second instar larvae diapause in leaf litter at the base of larval food plants and last instar larvae pupate on or near the base of food plants (USFWS 2010).

#30-1

25 feet – Mission Blue Butterflies

For locations that are avoided no project activities shall occur within 25 feet of the outer perimeter of the host plants.

Comment: For locations that are avoided no project activities shall occur within 50 feet of the outer perimeter of the host plants.

Mission Blue Butterflies are not good fliers and typically disperse an average of 150-167 meters of their lupine patch. Many of these Mission Blue sites are on the edge of open grassland and

the nectar plants are typically on the inside of those grasslands. They need to find resting areas and nectar plants close by to feed during their short life. Scarcity of forage and refugia post-burn can stress an already depleted, endangered population. A 12-ft control line would likely be within that the grassland area and bulldoze or hand clear down to mineral soil. This would create a barren edge within 25-ft of lupines and then a large patch of burnt earth; this could force next years' butterflies to forage farther than would have occurred had a 50-ft buffer been implemented. A prescribed burn within 25 feet will impact nectar plants for the following year; it may create a flush of forbs or it may not especially if it is a drought year. Leaving a 50-foot buffer would leave a greater chance of some nectar plants surviving to the next flight season.

#30-1

For locations that are surveyed these locations will be thoroughly surveyed once every two weeks for the presence of Mission blue butterfly eggs and larvae (including evidence of larval feeding) March thru June.

Comment: All host plant locations equal to or greater than five host plants and less than 550 feet from other host plant locations will be avoided.

#30-2

The National Parks Conservancy built their own burn boxes to test the effect of fire on Mission Blue lupines and found that burning did not result in increased lupine recruitment.

Two points from a recent study on Mission Blue habitat

1) *Even small number of host plant occurrences aid in preventing extinction in metapopulations. In a study model that eliminated all small patches of host plants (<15 host plants), the survival rate for Mission Blue butterflies went down to 40% in that scenario.*
2) *Overall average patch occupancy is 40% and is even lower in small patches. Checking small patches of host plants even at this frequency for Mission Blue occupancy can give false negative results. In the study area the largest patch was 828 lupine plants. This patch is far greater than any of the Peninsula Watershed patches, making even the 5+ lupine plant patches more critical to Mission blue butterfly continued long-term survival.*

Thank you for your consideration,

Sonya Felman Foree, Biologist

From: M Cohen [mailto:mbc404@gmail.com]
Sent: Sunday, April 4, 2021 9:31 AM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Cc: commission@sfwater.org
Subject: Comments on Initial Study-Mitigated Negative Declaration for the proposed SFPUC Prescribed Burn Project San Mateo County, California

I am adamantly against the CalFire plan to burn 385 acres next to Belmont Heights in Belmont (SITES 4 and 6), part of the proposed SFPUC prescribed burn project in San Mateo County.

For the following reasons, please abandon your plan for SITES 4 and 6:

1. You have neglected to address the fact that there is a large area of residential homes nearby SITES 4 AND 6, including many homes that are actually adjacent to these sites. #31 -1

2. You have not indicated how and when you will inform these residents of your proposal. They need to know at least 2 or 3 days in advance so that they can prepare for and/ or evacuate the area in order to avoid effects of harmful air pollution and possible fires that might burn their homes down! #31 -2

3. SITE 4 is adjacent to an elementary school with over 300 hundreds students and you have not informed the school district of this proposal, nor addressed the health concerns of these children of these proposed repeated burns and possible need for evacuations as well. #31 -3

4. Your plan included the possibility of using herbicides to kill vegetation prior to burning. I believe that herbicides are dangerous to our health and the possible burning of these herbicides will likely create even more dangerous air pollution. #31 -4

5. These sites include many non native plants, including Eucalyptus trees that are highly flammable. We saw in the Oakland fire (1991) that Eucalyptus trees were the major source of flying embers that landed on nearby houses and caused the largest dollar fire loss in United States history. How will you prevent these trees from catching fire during your prescribed burns? #31 -5

6. Rather than use dangerous, possibly uncontrollable burns to create a fire break, you should mechanically remove (i.e. cut down) all of the Eucalyptus and other non native #31 -6

plants. Then continue the existing plowing plan on these sites which have been effective firebreaks for many years #31-6

7. Having lived in this area for over 30 years, I know that weather conditions can shift quickly. Our area is often very windy. How will you extinguish your prescribed burn if the wind conditions change rapidly as it often does. I am extremely concerned that embers will be flying and land on my home. #31-7

For these reasons, I urge you to abandon SITES 4 and 6 from your proposed project and find a more suitable area far away from residential areas and schools. #31-7

Michele Cohen

2601 Wakefield Dr

Belmont, CA 94002

From: January [mailto:january@jaffe-nice.com]
Sent: Friday, April 2, 2021 4:29 PM
To: Sacramento Public Comment@CALFIRE <SacramentoPublicComment@fire.ca.gov>
Subject: Belmont controlled burn communication

To whom it may concern:

I am writing to express concerns about planned Spring vegetation burning near Belmont Heights homes here in San Mateo County. A neighborhood association meeting pointed out a lack of communication with residents in addition to errors, omissions and assumptions in the proposed plan. We were given to understand that:

#32-1

- The project description does not set any limit on the number of acres in a single burn. Buried under another topic is the mention *"we aim to burn approximately 200 acres a year"* but this is **not binding** since it is **not included in the Project Description**.
- The plan fails to mention Fox School, the Cross Country Course (an estimated 30,000 users per year) and 500 residences within ¼ mile of the sites. **Air quality impacts during and *lingering after* the burn are thus dismissed.** As a family with asthma issues, we are left to wonder if health concerns have been adequately addressed since there has been little notification.
- Though the report states that the burn's purpose is to *limit the spread of wildfire*, it indicates that existing mowing and roads are adequate fire breaks.
- The plan is to replace native chaparral with grass, which is *proven to be more flammable*. More flammable grass will regrow within the year.
- Residents—even those sharing a property line—will NOT receive direct notification of the burn day(s).

Thus I am adding my voice to my neighbors' in requesting a more thoughtful plan to include these changes:

#32-2

- Reissue the MND with CORRECT AND COMPLETE information, including air-quality protection for Fox School, the Cross Country Course, and hundreds of adjacent homes.
- In the Project Plan, COMMIT to burning no more than 10 acres of Site 6 (Cross Country Course) per year—equivalent to 7.5 football fields or 40 home lots.
- DELETE the objective of converting shrub to more-flammable grassland, and provide a controlled, enforceable program to ensure the return of chaparral and native plants instead of more invasive species.
- Establish an E-MAIL NOTIFICATION list for residents to receive notice 24 hours before scheduled burn days.

Thank you; I appreciate your agency's kind attention to this matter.

January Nice

April 2, 2021

Sarah Collamer
VMP Coordinator, Forester I
California Department of Forestry and Fire Protection
CZU Resource Management
6059 Highway 9
Felton, CA 95018

RE: Crystal Springs Cross Country Course and the "Initial Study - Mitigated Negative Declaration" dated February 16, 2021

Dear Ms. Collamer and others whom it may concern:

I am writing to express concern about the prescribed burn process apparently planned for the area that contains the Crystal Springs Cross Country Course, a significant recreational facility within "Burn Plot #6" in the *Initial Study - Mitigated Negative Declaration* dated February 16, 2021.

#33-1

Fire Protection Background

To share my background, I was employed by Cal Fire many years ago as a Foreman in charge of a "Range Improvement" crew that specialized in backfires on large forest fires and in controlled burns in several Northern and Central California counties. As a former fire professional, I appreciate the need for fire protection and support the mission of Cal Fire to protect our communities.

Crystal Springs Cross Country Course

After my Cal Fire career, as Head Coach of Cross Country and Track teams at College of San Mateo (CSM), I designed and built Crystal Springs Cross Country Course. The Course has been operated continuously by CSM for 50 years under a permit from the San Francisco Public Utilities Commission. I have personally maintained the Course and managed nearly all competitive events throughout its history.

The Course has a rich 50-year history in which hundreds of thousands of high school, college and middle school athletes have competed and created memories. The carefully designed 3-mile course is known for its rigor, safety, and scenic beauty, a combination that is unmatched in Northern California. Each year it hosts over two dozen large competitions, including championship events for around ten leagues (totalling roughly a hundred schools) and a few other events that have become traditions for local athletic programs. Over these 50 years, most high school cross country athletes between San Francisco and Monterey have competed on the Course. The Course even hosted the 1974 National Cross Country Championship.

In addition to hosting formal competitions, the course is used for running and hiking by dozens and sometimes hundreds of people virtually every day.

Recreational Resource to be Protected

The Course is a valuable and frequently used recreational facility that should be protected. Burning the Course would diminish its aesthetic appeal and the experience of young athletes that compete there. In addition, the Course area contains two structures and numerous markers used for events, all of which

#33-2

could be destroyed by fire. The Course is not an unused open space and it should not be burned in the manner that an unused open space might be burned.

#33-2

As a former Cal Fire professional, I also value fire prevention and I understand the prescribed burn process. I don't dispute that fire protection, perhaps including some prescribed burning in areas near the course, may be appropriate. However, I am also very familiar with the terrain and believe that sufficient protection can be achieved through measures that do not include extensive burning.

Suggestions

I suggest the following steps to improve fire safety and protect this valuable recreational resource:

#33-3

- Establish a fire break southwest of the course to mitigate risks presented by fires originating on or near Highway 280. This could involve prescribed burning between the freeway and up to points near the Course.
- Remove, as needed, dead vegetation within the Course area through means other than burning.
- Continue to maintain the fire break on the northeast edge that already provides distance for the neighborhood homes and accessibility for fire equipment.

Please Visit the Site

#33-4

My hope is that you will recognize that this area is different from largely unused nearby open spaces. The Course is a valuable recreational resource that would be degraded by a large scale prescribed burn.

I invite you to personally visit the Course to enable more precise and informed planning. I would be pleased to show you around the Course at your convenience. Please contact me by phone or email if you would like to do this, or if you have any questions. I would appreciate an opportunity to hear your thoughts on the information presented above and to exchange ideas on how to control fire risk while also protecting this unique community resource.

Sincerely,

Bob Rush
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