



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."

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.

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.

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.

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.

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.

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.

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.

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.

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