



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

July 30th, 2021

Via email to: sacramentopubliccomment@fire.ca.gov

Cc: Kevin Mullin's office via: Elena.Ortiz@asm.ca.gov

Subject: Comments on the revised Mitigated Negative Declaration for the proposed SFPUC Prescribed Burn Project

The Response to Comments, page 11 says: 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).

Reply- This statement is conjecture and indefinite. The IS-MND does not propose any before-burn data collection, followed by an after-burn data set, to validate this statement. In this serpentine grassland environment, given the nitrogen fertilizing from the adjacent freeway, we don't know if "prescribed burning for habitat improvements for the species discussed below" will be beneficial to the natives and the environment and the goal of fuel reduction. This is because invasive grasses are just as likely to return and expand into the resulting clearing as happens everywhere, including on the road edge. Invasives will increase fuel load on the landscape; thus, resulting in an annual cycle of fuel reduction burns that would end up destroying the native grassland.

Pre and post data collection should be a minimum outcome of this project. Before-and-after vegetation surveys show that a single fire kills millions of native plants, and millions of weeds grow in their place- more on invasive recolonization below. Like goats, fire is non-discriminate but unlike goats, fire can burn the soil too as California is currently experiencing. And where the natives were replaced by the weeds, the fire-fuel on that spot increases by 2,000 percent thus negating the goals of this project.

The IS-MND says the project is a native species rich grassland which will prescribed burned and then the SFPUC will manage if for invasive species. This is backward. Why would you burn out low fuel natives and then proceed to manage high fuel invasives creating a fire hazard that must be managed? How does introducing invasive for the SFPUC to manage meet the stated goals of fuel reduction and species revival? Wouldn't it make more sense to strategically remove the few invasive and expand natives on their habitat?

Repeated burns as projected on page 31 of the IS-MND will be a major impact on the scenic resources of the landscape. The response states with regard to the scenic easement,

“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.” Note that the SFPUC is in violation of its own EIR which says that prescribed burns result in toxic runoff that will contaminate water. And that these burns have not been noticed within the scenic easement by the general public- none of your commenters said that they had seen it already. What this project proposes to do is to infringe on the scenic resources of the general public and should not be permitted until the goal outlined can be shown to be effective. The SFPUC is a malicious partner in the project who cannot be trusted to even follow their own EIR.

The SFPUC serpentine grasslands around the Crystal Spring reservoirs has the most concentrated square mile of rare and endangered species in California according to Craig Dremann in Woodside a grassland restoration authority and maybe unique in North America. The response also says on page 12 that “Ten special-status wildlife species are known to occur or could potentially occur in the project area.” We should follow Muir and Leopold’s advice to do the least harm in this area. However, the IS-MND does not look at alternatives so there is no way of evaluating what would cause the least harm to this species rich landscape.

There are examples of grassland restoration in the area such as the highland portion at Edgewood and the Dremann project in Woodside. Neither involves fire. They involve considerable volunteer effort and show what can be feasibly done under CEQA to achieve the goals of this project without fire. The long-term trend in CA grasslands is extinction of the native species many of which are more successful getting on the Endangered Species List characterization than achieving restoration status. This project needs to say how a landscape that experiences fire rarely will be restored under the current goals of fuel reduction, grassland restoration and personal training.

The project could be beneficial- if done rarely or occasionally. That link to the paper from Berkeley doesn’t go to a paper so I was not able to browse and evaluate the boundary conditions of the study. Until Calfire can show how invasive will NOT dominant the charred landscape, requiring repeated burns, there is no data presented in this IS-MND, or pre and post burn sampling called for in this IS-MND, to arrive at another conclusion. Most examples of natural fire on the landscape show expansion of invasive fuel loading. USDA forest service and other outlets report this phenomenon. See for example <https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.461.7645&rep=rep1&type=pdf> where species, such as those that occur here on serpentine grasslands, “are adapted to a particular temporal and spatial pattern of burning”, not fire adapted in general as this IS-MND implies.

The precipitation pattern has changed in California because of climate change. We have heavier downfalls and longer dry periods which compacts the soil and increase runoff. Following recent fires including the Rim Fire we have seen toxic runoff from the recent burn contaminating the water. Murphy's Law states that the landscape would see a massive downpour following a prescribed burn impacting the water quality that this project seeks to protect. Alternatives such as excluding native serpentine grasslands from treatment zones would be beneficial to the stated goal of fuel reduction and native regeneration.

Calfire's stated goal for the project has changed in this reissued IS-MND from preventing wildfires to reducing fuel load so as to protect water quality; and helping grassland restoration of native species. Note that if you cannot prevent wildfires given the scale of fires today in CA there is no way to protect the water. And fire may be a poor choice for restoration. When Area H in Redwood Shores was restored, 900 goats were utilized, so that the endangered species could move out of the way of the foraging goats at the slow pace of the goat's foraging movement. Fire with its rapid progression in a controlled burn is a poor choice for species preservation.

Cities are using goats to reduce fuel load and control wildfires according to NPR and they work best on steeper terrain. <https://www.npr.org/2020/01/05/792458505/california-cities-turn-to-hired-hooves-to-help-prevent-massive-wildfires> The NPR article doesn't say anything about native restoration just fuel reduction. In Kenya and Sudan, the goats have to be moved or they will strip the bark off adjacent shrubs and trees killing the entire landscape by munching it into a denuded mudscape. They will browse down and eat the roots too if left untended. Indiscriminate browsing is resulting in the loss of semi-arid Savanah to desertified Sahara landscapes a process that is reappearing in California with cow-wrecked landscapes. Herders with spears protect the goats at night from foraging lions and leopards within popup acacia thorn enclosures. In Half Moon Bay at Beechwood goats are penned in steel enclosures that have foregone electrification. The response stating that goats do not consume woody stems is not correct- it only holds if the goats are allowed to move to new pasture. The goats are as indiscriminate as fire but with their slower pace can be managed over the landscape including sweeping up their droppings, similar to wood pellets, for cooking fires, to prevent reseeding of invasives.

Goats are also lighter on the landscape than the heavy "trucks and mechanized" diesel equipment that Calfire will be using where possible on the "small patches of leafy bushes" that occur here. They are also able to access hilly locations that the equipment cannot, and they provide an alternative to herbicides that Calfire is considering.

This project's goals are to reduce fuels to prevent the spread of wildfire and to help natives on the landscape. Only one method exists for the grasslands to achieve these two purposes simultaneously: in this part of California--"Craig Carlton Dremann's Monthly Hand-mowing Method at 8 inches high, with Echo 225 2-cycle String Trimmers, fueled

with 100 octane gas, and stung with Ace hardware professional string”. Dremann says it’s “very easy to do (i.e., restore a CA grassland), if you have the dormant native seeds still in the soil. Just cut the weeds monthly so they never produce any more viable seeds--always cut them green, never brown. Then, whenever necessary, add the nutrients that were removed during the Spanish Rancho Grant days, and "Oui-la!" you have unearthed a native grassland, as if you were unearthing an ancient civilization--having the exact plants grow on the exact spots where they last grew, maybe one or two centuries ago.” Repeated burning would result in the loss of the dominant seeds in the soil, forever denuding the landscape. This may be why Mid-Peninsula Open Space District denied Calfire a permit to continue burning on the southern portion of Russian Ridge and that decision process should be included in this IS_MND.

The project should look at an alternative to MOVE the project to a grassland where NO rare and endangered species exist in order to preserve the scenic resources, conserve natives on the landscape, and reduce fuel loading with natives. The remaining 90% of California's grasslands do not have this concentration of rare and endangered species, adapted to a particular temporal and spatial pattern of burning, so why weren't other locations that contain zero rare and endangered species, looked at in this document as alternatives? This is where an EIR is necessary since it requires alternatives. A no burn alternative that preserves the scenic easement and reduces fuel loads, by say mowing, before invasive set their seeds, is a proven method for reducing fuel load and reestablishing natives on the land. Managed goat herding is another alternative that should be looked at in view of the stated goals. Moving the project to a site without natives is a third relevant alternative to the stated goals. An alternative to exclude native serpentine grasslands from treatment zones would be beneficial to the stated goal of water quality protection. These are all feasible alternatives under CEQA. The result of this minimal range of alternatives is that the impacts associated with them can be evaluated simultaneously giving policy makers the information to make an informed decision under CEQA.

Sincerely,



Gladwyn d'Souza
Conservation Committee Chair
Loma Prieta Chapter Sierra Club