



Protecting Marin Since 1934

April 10, 2019

San Rafael City Council  
1400 Fifth Avenue, Room 203  
San Rafael, CA 94901  
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Honorable City Council Members:

The Marin Conservation League's Fire and Environment Working Group (FEWG) has reviewed San Rafael's Wildfire Prevention and Protection Action Plan. The plan is comprehensive, ambitious, and well-reasoned. It comprises the current state of knowledge regarding best practices. We applaud the town council and staff for their diligence on this important issue. We submit the following questions and comments for your consideration:

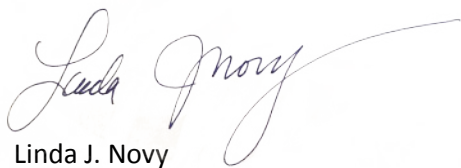
1. The Wildfire Prevention and Protection Action Plan identifies many actions contemplated on City-owned open space, mostly fuel breaks behind houses abutting open space, fire road clearing for emergency access, ridge top shaded fuel breaks, and goat grazing areas. Although in all cases vegetation removal is generally well-intended to reduce risk of wildfire igniting human structures, it is important to recognize that vegetation serves a number of important functions in the environment. Therefore, these activities also can have some negative environmental impacts (e.g., expand invasive plant populations, impact rare native plants, harm nesting birds and other wildlife, and alter storm runoff patterns leading to erosion, sedimentation, and downstream flooding). These impacts largely can be mitigated by using best management practices such as bird and rare plant surveys in advance of removal work, avoidance of changes in storm runoff, and monitoring of post-removal invasive plant conditions and regular follow-up maintenance. What is the overall strategy and commitment for city staff to assess site specific impacts and to implement these environmental mitigations over time?
2. Fuel breaks should be shaded whenever possible, and need to be permanent facilities with a commitment to maintenance over the long run, especially where broom species and other invasive plants are present. To our knowledge, the City has only a limited history of maintaining its open space areas, and some of that was funded by private donations of landscape expertise and contract labor. What is the City's plan to fund long term maintenance of fuel treatment areas?
3. Clearing vegetation for fuel reduction can cause invasive weeds to spread in natural areas. Does the City plan to use the full range of integrated pest management (IPM) techniques and tools, including hand-pulling, mechanical means, and/or chemical follow-up and monitoring, in order to be effective and reduce maintenance costs? Such IPM methods were employed with private funding in past years, in cooperation with the San Rafael Fire Department, to remove invasive plants from city lands in the Dominican, Gold Hill, and Peacock Gap areas. Limited use of herbicide under the guidance of a landscape architect was cost-effective in follow-up work maintenance.



4. How does the City prioritize road side vegetation clearing on key public roads and escape routes Vs. ridge top road clearing on open space lands?
5. Goats, although an expedient means of reducing fuel in the short-term, can have negative impacts to native vegetation. For instance they girdle and kill madrones, and they do not kill broom plants; rather, they strip the bark and leaves allowing the plants to re-sprout the following year. Over the long-term, goats may not be cheaper than hand labor. Will the city coordinate with Marin County Parks (MCP) and Marin Municipal Water District (MMWD) staff, who have experience in monitoring the effectiveness of goat grazing on their lands? Will the City consider using human labor such as North Bay Conservation Corps as an alternative to goats, or use both goats and labor in a sequential manner, as MCP has done?
6. The City owns considerable acreage of open space. Although not addressed by the action plan, other actions could be taken in open space to reduce wildfire hazard. For instance, closing open space to public use during red flag warning days, and investing in or converting a Eucalyptus forest to natural plant communities with lesser fuel hazards could achieve wildfire protection goals. How will the City manage natural habitats and public use to achieve multiple benefits.
7. Wildfire disasters are being exacerbated by climate change. Action plan initiatives could include measures that improve carbon storage and soil moisture retention in homeowner landscapes by putting chipped material back on site or insuring that chipped material gets recycled through green waste processors for future use. How can San Rafael residents learn more about this approach when considering reducing vegetation on their property? Can the city take an active role in managing green waste resulting from fuel reduction?

Thank you for your great work on this project. We are eager to support the City of San Rafael in its efforts to reduce hazards to life and property from wildfire and at the same time to conserve environmental benefits such as native plant communities, wildlife and wildlife habitats, and water quality through better management of the City's open space lands.

Sincerely,



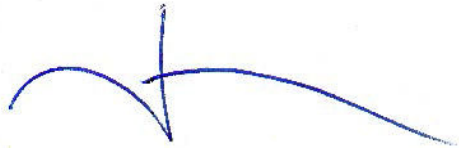
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