

December 9th, 2020



Christie Neal
Battalion Chief
Marin County Fire Department
Vegetation & Fuels Management Program
33 Castle Rock Avenue
Woodacre, CA 94973

Subject: Comments on the Community Wildfire Protection Plan (CWPP)

Dear Battalion Chief Neal,

Thank you for giving us the opportunity to comment on the revised Marin County Community Wildfire Protection Plan (CWPP). Quoting from the plan “The CWPP provides a scientifically based assessment of wildfire hazard and threats to homes in the wildland urban interface (WUI) of Marin County,” and “The purpose of the CWPP is to provide fire agencies, land managers, and other stakeholders in Marin County with guidance and strategies to reduce fire hazard and the risk of catastrophic wildfires in the WUI, while promoting the protection and enhancement of the county’s economic assets and ecological resources.” The County of Marin received a FEMA grant to revise the 2016 CWPP, which had been adopted by the Board of Supervisors.

The Marin Conservation League (MCL) finds the revised document improved over its 2016 predecessor. We applaud Marin County for the framing of the environmental issues and the collaboration we have with Christie Neal, the project lead. MCL supported Measure C and the formation of the Marin Wildfire Prevention Authority (MWPA) Joint Powers Authority (JPA). We have been working with MWPA through the Ecologically Sound Practices Partnership to develop best environmental practices for fire prevention work. We offer these remarks to further refine the Plan's approach to enhancing fire safety in an environmentally sensitive way. Thank you for considering the following:

A. MAJOR OMISSION:

1. A post-fire recovery/management plan (Attachment 1)

175 N. Redwood Dr., Ste. 135, San Rafael, CA 94903 | 415.485.6257 |
mcl@marinconservationleague.org

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B. COMMENTS BY SECTION (RED ARE ACTUAL SUGGESTIONS FOR CHANGES IN TEXT):

Recommendation for all maps to: Include live links for readers to review the maps in more granular detail. Citizens will be interested in looking more closely at their towns and neighborhoods.

SECTION 2.6. NATURAL RESOURCES PAGE 13:

Page 13. Paragraph 1. Add the red section: *Marin wildlands areas of the Golden Gate Biosphere Reserve in 1988, recognizing the global significance of its **habitats and biodiversity** (UNESCO 2002). **The California Floristic Province, including Marin, is recognized by Conservation International as one of the 26 biological hotspots in the world. This is the only area with this designation in the United States, and represents one of the greatest opportunities for restoration of declining habitats in the world.***

Page 13. Paragraph 2 – change the first part of the paragraph to the following:
*Fuel reduction projects are able to either **enhance or detract from** biological diversity and natural resources of Marin. For example, removing invasive exotic plants as potential fuel can restore native plant community structure and ecological function. **On the other hand, over grazing or removal of soil protective plants can lead to more invasive exotics, thus damaging ecological functions.*** (keep the rest of the paragraph as is).

SECTION 2.7. ENVIRONMENTAL CONSIDERATIONS PAGE 15:

Add the following bullets to the first list of environmental considerations:

- ***Excessive use of grazing to reduce fuel in native plant communities can change species composition, commonly called type conversion, and can also increase non-native species on the site. As an example, a presentation on Marin County Open Space land displayed post grazing in grasslands resulted in higher yellow thistle presence.***
- Add to bullet 5 – ***mammals, reptiles, amphibians, special status species.***
- Add to bullet 6 -***Changing the aesthetics or ecological integrity of the natural environment.***

Last paragraph of environmental considerations:

*All agencies developing vegetation management projects should consider resource protection, **monitoring, mitigation, and adaptive management** measures and compliance in project planning. Additional time and budget are generally required to ensure that sensitive natural and cultural resources are protected.*

SECTION 2.7.1 ENVIRONMENTAL COMPLIANCE PAGE 16:

Add: The recently passed California Assembly Bill No. 3074 (Fire prevention: wildfire risk: defensible space: ember-resistant zones) requires that the State Board of Forestry and Fire Protection develop guidelines that provide “regionally appropriate vegetation management suggestions that preserve and restore native species that are fire resistant or drought tolerant, or both, minimize erosion, minimize water consumption, and permit trees near homes for shade, aesthetics, and habitat”.

SECTION 3.2. VEGETATION SECTION PAGE 24:

Add paragraph at the end of the main section on wildlife:

This multitude of plant communities attracts a rich wildlife diversity that depends upon the vegetation for life cycle requirements. Maintaining the habitats for invertebrates, both above and below ground level, birds, mammals, reptiles and amphibians will ensure a healthy future to explore and experience nature in the Marin parks and open spaces. Many species have special status as rare and/or endangered and thus are of interest to science. A collaborative of public agency partners have joined together to create One Tam to enable Marin citizens to share a deep experience in nature on Mt. Tamalpais and its surroundings.

SECTION 4.1.1 ECOLOGICALLY SOUND PRACTICES, PAGE 36

Change to the following:

The coalition is led by the *ESP Steering Committee which advises fire professionals, defining best practices to guide the implementation of wildfire prevention plans and provides expertise and recommendations on specific projects.*

SECTION 4.5. COMMUNITY STAKEHOLDERS, PAGE 39

Add bullet: *Combat climate change by reducing GHG emissions and sequestering carbon*

8.0. MITIGATION MEASURES AND STRATEGY PAGE 73:

Add to first bullets in 8.0:

- *Reducing ignition sources in collaboration with PG&E and others*
- *Implement Environmentally Sound Practices (ESP).*

SECTION 8.1 – PUBLIC EDUCATION AND COMMUNITY OUTREACH. PAGE 74

Page 74: Add bullet to Living with Fire program (or a separate bullet if it doesn't belong there):

- *Environmentally Sound Practices will be introduced into the Living with Fire program, or by another means, to ensure the protection of natural Marin while protecting it from wildfire.*

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8.4.2. DEFENSIBLE SPACE Page 82

Page 82: Figs 30, 31:

For better readability, move this footnote with live link to the FSM website from pg. 81 to pg. 82. Also note it applies to Fig. 31 as well. *(It looks like the pages shifted down one but the footnote did not follow.)*

Page 83 paragraph 1: *Delete the sentence “Any fuel modification within 100-200 feet of a structure could be considered an improvement of Defensible Space.”* The reason being that the California defensible space definition is only to 100 feet. An alternative would be to call it additional fuel break space.

Page 83. Recommend Enhancement of Defensible Space: Change as follows to ensure public understands the difference in legal approach:

Some properties at the boundary of large parcels of open space (private or public) should be encouraged to maintain up to 200 feet of fuel break. This is no longer considered under the categorical exemption for defensible space and so will need additional environmental review. Where property lines are closer than 200 feet, refer to the recommendations under “Open Space and Common Space Area”.

SECTION 8.5– NON-RESIDENTIAL VEGETATION MANAGEMENT PAGE 87:

Page 87 - Add bullet to Prescribed fire benefits:

- *Consistent with the ecological processes in most plant communities and therefore more able to conserve biological diversity.*

SECTION 8.5. OPEN SPACE AND COMMON SPACE VEGETATIVE MANAGEMENT PAGE 88:

Page 89: *Grazing to Reduce Fuels* - Add a final sentence as identified below, to ensure readers understand the context.

Since 2016, herds of goats and sheep have been used to graze in open space areas as part of a large-scale fire hazard reduction project spearheaded by local landowners. The goat grazing program has been a collaborative effort to address key locations for fuel reduction to reduce the impact of wildfires in Marin communities. Over the past three years, this multi-agency project has successfully reduced hazardous fuels on hundreds of acres of high-hazard grassy woodlands throughout Central Marin. Some grazing practices are known to import and/or expand non-native plant species. Grazing practices should be monitored for impacts to native plant diversity and other ecological impacts and managed to avoid these impacts where needed.

SECTION 9.0. RECOMMENDATIONS AND ACTION PLAN PAGE 95:

9.1.1 Continue to support public support and community outreach (Page 95) – *Add bullet 1.4: Support and promote efforts to educate the public on environmentally sound practices and their implementation.*

9.1.3: Continue to improve defensible space (Page 96)

9.1.3.1.- Add *Improve defensible space around all structures applying ecologically sound practices.*

Page 96 – *Add bullet 3.11: Encourage use of native plants in landscapes in accordance with Assembly bill 3074*

9.1.4 Continue to improve vegetation management practices (page 96)

9.1.4.1 Encourage and support roadside vegetation management (page 96) - include resources required to develop a model to project future removal, associated costs, and making results trackable with site specificity for accurate planning and reporting to the Citizens Oversight Committee of the MWPA. For example, each year XX miles in these zones are slated for treatment.

Add bullet 9.1.4.7 – Use Environmentally Sound Practices in all vegetation management activities as identified by the Environmentally Sound Practices Partnership (ESP) for MWPA.

9.1.5.9. Specific Roadside Recommendations. This section goes deeper than others on treatment strategies and seems inconsistent with the details of other action items. It is recommended that other areas go into the same detail or delete the detail here. If added in other areas, ensure that ecologically sound practices are included. Also see comment above for 9.4.1.

9.1.6. Add a 6th Recommended Action Page 97.

9.1.6: Use Environmentally Sound Practices and Imbed Climate Mitigation to Planning and Operations

9.1.6.1 Lower GHG emissions, sequester carbon

9.1.6.2 Support green resource management

9.1.6.3 Include biomass recovery solutions

9.1.6.4. Conserve biological diversity

9.1.6.5. Decrease invasive non-native plants

9.1.6.6. Restore structure and diversity of native plant communities

9.1.6.7. Protect critical habitat and special status species

9.1.6.8. Prevent erosion and effects of actions on watersheds

SECTION 9.2. CONTINUE TO IDENTIFY WILDFIRE HAZARDS: Add a phrase at the end:
*Maintain an accessible online GIS portal to store and share the multi-AGOL maps and data developed throughout this CWPP process and **allow public and educational access as part of the process.***

APPENDIX B:

- Identify what a blank space mean. Every blank space should be filled (even w not needed, or not known), or it will lead to uncertainty and inconsistency.
- Add the following columns to the spreadsheet: approximate acreage, Ecological Sound Practices, and distance from structures.

MCL appreciates the CWPP team addressing these comments and looks forward to further collaboration.

Sincerely,



Robert Miller
President



Mike Swezy
Chair, Fire and Environment Working Group

Enclosure: Attachment 1

CC: Jason Weber, Chief Marin County and Ross Valley Fire Departments
Bill Tyler Chief, Novato Fire District
Mark Brown, Executive Officer Marin Wildfire Prevention Authority
Bruce Goines, Board President Marin Wildfire Prevention Authority
Rich Shortall, FireSafe Marin

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ATTACHMENT 1: Post-Fire Recovery Planning & Implementation

Since the CWPP is a protection plan, it appears not to have post-fire responsibility. Significant environmental damage can occur after a major fire. We could lose numerous plant species that are not adapted for fire recovery and the wildlife that depend on them. Denuded hillsides are unable to absorb heavy rains, leading to erosion and downstream sedimentation, landslides, and the release of toxins into the Bay from burned homes, businesses, vehicles and their contents. Planned processes and mitigations for post-fire recovery could potentially save billions of dollars and years in Bay clean-up costs and reduction of environmental impacts.

Such a plan would be a companion Post-Fire Recovery Plan (MPFRP) to the CWPP and would include but not be limited to items such as:

- A survey of the major land management agencies, and planning already in place.
- A plan for emergency on-the-ground help from the CCNB, CCC, CalFire or similar agencies.
- The emergency response process to act from day one of a fire event.
- The decision makers, likely funders, and implementers.
- Best strategies for maximizing carbon sequestration.
- Identification of toxic waste disposal options and steps to prevent contamination.
- A plan to collect, store and maintain native seed stock, and to make it available for revegetation to minimize erosion and reestablish biological diversity.
- Creation of a native plant nursery for revegetation efforts that could include revegetation of fuel breaks, assist with carbon sequestration efforts, and post fire recovery.