

From: [REDACTED]
To: Clerk; General Information
Subject: All Board Members - Board Contact Form
Date: Saturday, May 16, 2020 7:40:23 AM

EXTERNAL

Name * Craig Dremann

Select a Choice * All Board Members

Email *

Location: (i.e. City, Address or District Ward) East Palo Alto

Daytime Phone Number (if you wish to be contacted by phone)

Comments: *

THREE VERY IMPORTANT ISSUES, your Board needs to address:

1.) NON-FUNCTIONAL ombudsman? Why do you even have an Ombudsman, if they never response to questions from the public? I sent a question to your District Ombudsman five months ago, on the web-form on December 15, 2019--And never any reply, not even an acknowledgement of receipt? Topic was "Your District is still not monitoring the effectiveness of any of the grassland management tools you have been testing for the last 40 years?"

I would like a response from your Ombudsman sometime this year, please? And the Board should take a look at that issue too?

2.) NON-FUNCTIONAL EIR Comment Submission Form on website for the "Wildland Fire Resiliency Program" this week, that never exist on the server? When I discovered the missing form on Sunday May 10 at 10AM, the first reply I received from Elizabeth Storey, was that the form really did exist.

Then, when I emailed the evening of Tuesday May 12, "Website Still Not Functional" and added in that email, missing links on the District's domain did not stop at this single website?

The problem about missing webpages and missing links is a widespread problem at your District, with one out of every ten of the District's websites are MIA--and in that Tuesday email, I copied a partial report of the 45 broken links I found when I ran a scan of your domain at <https://www.brokenlinkcheck.com/>

Then, at your meeting the other night, when my wife Sue asked, will the Board going to extend the time that the public can submit their EIR comments, because the website form was not available until now.

The form only appeared on your website on Wednesday afternoon of May 13, when I got an email saying that "Our webmaster found the problem and the link you mentioned should be working now." That means that link never existed until 3:03PM on May 13, so the Board should do their duty under CEQA and legally extend the EIR scoping comment period until 3PM on June 13, so the public gets the full 30 day comment period?

I heard at the webcast of your meeting this week, an unidentified woman assumedly working for the District, told the Board that the EIR comment link had only been down since last Friday, but that is not true at all-- that link was never up, ever since that website was first put on your server, to start the legal 30-day EIR comment period.

The public EIR comment submission form was only put up after I had to insist twice that it was not there in the first place? Just like the dozens of other missing links that your IT person still does not even know, were not functional as of Wednesday? Your District's website was falling down around your ears, and then to have the woman lie about the failure, does not give the public any confidence that the Board is keeping a close enough eye on the functioning or lack of functioning of the management?

To add insult to injury, when I ran a new scan Saturday May 16, the website --<<https://www.openspace.org/public-comment>> has a missing link for the "openspace.org/public-comment" that originates from the <https://www.openspace.org/about-us/meetings/20-09> website--so that is why you may not have received any public comments for that meeting, because the form was missing from that website also?

And the <https://www.openspace.org/our-work/projects/wildland-fire-management> page has a missing link for "Defensible Space Program details". Plus you still have at least 28 other missing link, but that was only after scanning 1,300 or your webpages containing over 1,700 links, so the odds ARE getting better.

And that is especially important when you are trying to follow CEQA, and the form that people are supposed to use to send you CEQA comments, does not even exist, and then someone lies to the Board that it was only down for a few days, when it never existed during the length of the ongoing legal comment period?

3.) Part of your EIR process for the "Wildland Fire Resiliency Program" must take a break right now, until all of the alternatives have been analyzed and included, so that the Board and the public can choose CEQA-required least environmental-damaging alternatives, to meet the District's objectives when they conduct project to implement the grassland weed management portion of the fire program?

And, what I call "Craig Dremann's Meadow-Whisperer Method" is the least environmentally damaging method, to manage grassland weed, and convert those areas into the most fire-safe wildflower and perennial native grass meadows. And your District has known about my method for at least 18 years, and Cindy went and visited the 70 acres at 300 Byers Lane in La Selva Beach that is currently the best restored grassland-oak woodland habitat in the State at 95% native cover when we started with only 1% in 1992.

However, your District has resisted on never trialing my method, even on a small scale, so that its effectiveness could be compared to the other alternatives that potentially can cause a huge amount of environmental damages, and are much slower to achieve your purposes or goals, of fire safety and natural resource management?

Over a decade ago, two of your Board members went out with me to Russian Ridge, so I could show them what my method could achieve. The second Board member was Yoriko Kishimoto—about noon, we had lunch at Alice's Restaurant, then drove and walked up Russian Ridge, and then on the drive back to Skylonda, she suggest that I do my method as a volunteer on that 100 acres of

grasslands for free? —While the last consultant working on the same preserve a few years earlier and achieving nothing using the old methods of burning and grazing, was paid \$300,000 for those damages to the grassland resources?

And right now, when this EIR is being put together, unless the Board steps in right now, my method will probably not appear in the EIR as an alternative.

Plus, when my method does not appear as an alternative in your EIR, then the Board and the public will never know, that there exists a method that can achieve the project's goals, with close to zero environmental damages? Especially important to know, when all of the other alternatives can potentially destroy the very resources the District is supposed to be protecting--as my comments to the Board for their meeting this week, outlined the details of the potential damages?

So, until your District has done a trial of my method at least on a small scale, I do not see how your EIR would be able to compare my alternative with your other alternatives, and so your document would end up being inadequate under CEQA and the law?

Perhaps, one of the District's grassland preserve, like Monte Bello Ridge or one of the others where you already have grazing occurring on it, could be used as a test area for the various grassland management methods?

If the District could set aside that portion of the EIR, that covers any grazing or burning of the grasslands, and then establish test plots and try burning and grazing and my method, and any other potential alternatives that any other professionals might have available?

Then, when your managers write your EIR for the grassland management portion of your fire management program, you will have compared them all at the same time at the same place? And then, you and the public can make the best-informed decision as to which method or methods work the best to achieve your projects goals, and cause the least amount of environmental damages?

Sincerely, Craig Dremann

DRAFT RESPONSE FOR BOARD CONSIDERATION

Dear Mr. Dremann,

Thank you for bringing your concerns to the attention of the Midpeninsula Regional Open Space District Board of Directors. Please find our responses to the issues you raised below:

District Ombudsperson

Regarding your ombudsperson inquiry, the ombudsperson(s) is an appointee of the Midpeninsula Regional Open Space District (District) Board of Directors (Board) whose role is to follow-up on resident and neighbor inquiries or complaints and work with all parties to resolve any misunderstandings or conflicts that have not been satisfactorily addressed by District staff. The ombudsperson works independently and objectively to assist in maintaining positive relations with residents and neighbors.

Per our procedures, the current ombudsperson appointees were notified of your inquiry as staff attempted to resolve the issue. Staff have dedicated significant time to help resolve your concerns and communicate directly with you regarding your questions and suggestions on the proposed Wildland Fire Resiliency Program (Fire Program) and the management of invasive, non-native plant species on District lands. Senior Resource Specialist Coty Sifuentes-Winter responded to your proposal regarding grassland management on April 23 and recently replied to your follow-up questions. The ombudsperson will contact you independently to discuss the matter directly with you. The ombudsperson will then report back to the Board with the details of the conversation and any possible resolution or suggested next steps.

Fire Program Comment Submission Web Link

Regarding your statement that the Fire Program comment submission form was missing from the website, staff has investigated the matter and determined that the form was available on the Fire Program web page beginning on April 27. Unfortunately, a secondary link to the same form was broken on a separate Wildland Fire Overview page. That link was repaired on May 13. Given this finding, the District is extending the public comment period by the number of days the link was broken and adding an additional five days of comment. The comment period will now end on June 18, 2020. Thank you for raising this issue to us.

Defensible Space Program Web Link

Regarding your concern about the link to access details on the Defensible Space Program, the District has redirected the URL to the [Wildland Fire Overview](#) page for greater visibility and accessibility, particularly by members of the public who are seeking information related to the Fire Program.

EIR Alternatives Review

In your comment letter, you request that the EIR process for the Wildland Fire Resiliency Program be suspended until all of the alternatives have been analyzed and included. Please note that the project is currently in the scoping process. Part of the EIR scoping process is to

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obtain public input so that an appropriate range of alternatives can be formulated and analyzed in the EIR. Input collected can include suggestions on the range of alternatives that should be considered. The EIR will evaluate a reasonable range of alternatives that feasibly attain the project objectives and avoid or lessen any of the proposed project's significant effects.

In your letter, you describe the "*Craig Dremann's Meadow-Whisperer Method*" as the "*least environmentally damaging method to manage grassland weed and convert those areas into the most fire-safe wildflower and perennial native grass meadows.*" The letter also mentions the 70 acres that you restored at 300 Byers Lane in La Selva Beach using this method. The District appreciates your efforts in restoring grasslands at other sites. We have indicated our interest in issuing you a research permit to conduct a pilot project using your methods on District lands to evaluate their effectiveness and suitability for expanding the methodology on vast acreages of grasslands that the District manages. Such a pilot project is critical given that there is insufficient published scientific literature to confirm our ability to reach desired outcomes and to replicate the methodology across thousands of acres with current staffing capacity and funding resources. For the District to invest public tax dollar funds on such a method, we need to ensure due diligence that the investment is sound, can be replicated across vast acreage, and can be accomplished with current staffing capacity and funding constraints.

Another option that has been discussed with you previously is our Grant Program. You are welcome to apply for grant funds to conduct the research work and publish the findings in peer-reviewed scientific literature, which would help further disseminate the information to a broader audience including multiple land management agencies.

The methods proposed for the Fire Program are based on the District's Integrated Pest Management Program (IPM), the best available science, and industry standards. The mitigation methods and Best Management Practices (BMPs) are protective of the environment. The District is happy to report that these methods and BMPs were recently recognized by the State of California when it awarded the District with the 2018 IPM Achievement Award for Leadership in IPM.

According to CEQA, an EIR must describe a *reasonable* range of alternatives to a proposed project that could *feasibly* attain most of the basic project objectives and avoid or substantially lessen any of the proposed project's significant effects. Based on preliminary information, your methodology would require multiple annual mowing of all grasslands, equating to 216 hours per acre. With 9,000 acres of grasslands, this methodology would require 1,944,000 hours of mowing per year, equating to more than \$87 million in annual costs. Neither the time requirement nor the costs appear feasible or reasonable.

Pilot Research Project

Again, we highly encourage that you consider pursuing a pilot research project on District lands to test your methodology and evaluate the effectiveness in meeting the performance goals, per acre cost, and ability to feasibly replicate the approach at a larger scale across hundreds or

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thousands of acres. This can be done at a smaller scale on District land and the findings could be of great benefit to not only the District, but also to many other land management agencies across the nine-county Bay Area. The findings may also be substantial enough to merit publishing them in a scientific journal for broader outreach and awareness. As discussed before, we are open to working with you on issuing a research permit, and you can also apply for funding for such an endeavor through our Grant Program. Thank you for your interest in the District's grassland management practices and the Wildland Fire Resiliency Program.

Sincerely,

Board President Karen Holman

CC:

Board of Directors

General Manager Ana Ruiz

Senior Resource Management Specialist and Project Manager Coty Sifuentes-Winter

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