From: Jennifer Woodworth
To: Kirk Lenington; Brian Malone; Coty Sifuentes-Winter
Cc: Ana Ruiz
Subject: FW: All Board Members - Board Contact Form
Date: Friday, June 5, 2020 9:43:49 AM

From Mr. Dremann

From: [redacted] <no-reply@wufoo.com>
Sent: Thursday, June 4, 2020 5:58 PM
To: Clerk <clerk@openspace.org>; General Information <info@openspace.org>
Subject: All Board Members - Board Contact Form

EXTERNAL

Name *	Craig Dremann
Select a Choice *	All Board Members
Email *	[redacted]
Location: (i.e. City, Address or District Ward)	East Palo Alto
Daytime Phone Number (if you wish to be contacted by phone)	[redacted]

Comments: *

Sent to District Land Management, to get data, in order to make comments on EIR--

I want to send another Public Comments for your Wildland Fire Resiliency Program EIR, and have run into a paradox about the District's management for the past 25 years, and see if there is any before-and-after project data, to support any more grazing or fires?

1.) FIRES BEFORE-and-AFTER cover transects? -- For Russian Ridge or any of the other Preserves where the District has intentionally had fire set in grasslands, do you have any before-and-after vegetation transects, that show that fire really does improve the natives?

Why I am asking that question, is because the vegetation-cover transects that I have conducted at Russian Ridge from 2003 to date, have measured that the burn conducted there in July 2007 CalFire illegal burn destroyed 2 million native plants, and the burn created empty spots, where 3 million weeds moved in to fill those spots? Any before-and-after vegetation cover transect data, available for the illegal burns conducted in 1998, 1999, 2002, 2007 or 2009?

The fire-killed environmental native plant resources that existed at Russian Ridge before the fires, included 200,000 Sitanion grass plants, 156,000 Nassella pulchra plants that were lost in the fires, 32,000 Melica grasses, 20,000 Festuca grasses, 20,000 Koeleria grasses, 500,000 annual tarweeds, 500,000 owls clover plants, 400,000 Layia wildflowers, 224,000 White Yarrow plants, 160,000 Amsinckia plants, 52,000 lupines, 40,000 native Plantago, 40,000 miners lettuce, 40,000 coyote mint plants, 40,000 California poppy plants, 40,000 blue eyed grasses, 12,000 popcorn flowers, 12,000 buttercups, and 10,000 Farewell to Springs!

From my Russian Ridge transect cover data, the weeds that were spread by the CalFire illegal burns at were, 808,000 Italian thistle plants, 527,622 Harding grass plants, 152,000 yellow star thistles plants, and 2 million wild oats plants.

2.) GRAZING BEFORE-and-AFTER cover transects? -- For any of the Preserve with grasslands that have been grazed in the past, or are currently being grazed, do you have any before-and-after vegetation cover transects, to show that those grazing projects are actually improving the native plants instead of destroying them? Without that before-and-after data from your own grazed preserves, it will be very difficult for your District to justify continued grazing until you do those studies, and it would be premature to include grazing in your EIR as an alternative that has any environmental track records supporting its use?

3.) ANY GRASSLAND cover transects available from your agency, so you can analyze the "NO PROJECT" alternative? -- In order to include the CEQA required "No Project" alternative, the District should have done like I have, and measured vegetation cover year-after-year to determine what happens in your grassland preserves without any projects, so that a proper "No Project" alternative analysis can be conducted.

The paradox that I have encountered at Russian Ridge, is for many years after the July 2007 CalFire illegal burn, the grassland native species that were damaged by the fire continued to decline, for four more year. But since no projects have been done at the north end of Russian Ridge since 2007, then, starting in 2011 and in the last nine years, the native plants in the grasslands are recovering on their own.

So the paradox is that, every method your District used in the past to manage grasslands, that you want to continue to use like fires and grazing, destroys the natural resource--whereas the "No Project" method has been the most successful method to manage the native plants and the fire-fuel weeds in those grasslands?

However, if my "Special Mowing method to Unearth Dormant Native seeds" is included in your EIR as an alternative, that works about 5 times faster to restore the grasslands and eliminate the fire fuel, than the "No Project" alternative already does?

So if you could please send any copies of any before-and-after vegetation cover transects (1.) Fires conducted on the Preserves? or (2.) Grazing projects?

Look forward to your reply.

Sincerely, Craig CELL [redacted]

From: Jennifer Woodworth
To: Kirk Lenington; Coty Sifuentes-Winter; Brian Malone
Cc: Ana Ruiz
Subject: FW: All Board Members - Board Contact Form
Date: Friday, June 5, 2020 10:12:02 AM

Email from Mr. Dremann

From: [redacted] <no-reply@wufoo.com>
Sent: Friday, June 5, 2020 10:10 AM
To: Clerk <clerk@openspace.org>; General Information <info@openspace.org>
Subject: All Board Members - Board Contact Form

EXTERNAL

Name *	Craig Dremann
Select a Choice *	All Board Members
Email *	[redacted]
Location: (i.e. City, Address or District Ward)	East Palo Alto
Daytime Phone Number (if you wish to be contacted by phone)	[redacted]

Comments: *

In order for your EIR to be adequate, for the proposed "Wildland Fire Resiliency Program", and to justify the continued and/or future use of grazing or prescribed fires for grassland management on ANY of your preserves, a minimum amount of management data needs to be provided to you and to the public in the EIR.

That way, we can ALL (including your management team) see what the use of the dozen or so fires has done to the resources, and has the use of domesticated animal grazing, damaged or improved the native plant resources to date?

Fortunately, I have been producing some of that data independently since 2003 at Russian Ridge regarding the impact of prescribed fires on the native grass natural resources, and it has been extremely damaging--to the point that certain species of native grasses were so damaged by the July 2007 fire, that they went extinct--Which I hope that everyone on the Board will agree, THAT is the worst way to manage a resource, when your management project causes the resource to go extinct?

You can see my chart at https://www.ecoseeds.com/1-mid-pen-nativegrass-trends.png -- And your land management team should be able to produce the exact same kind of charts, to show the before-and-after effects on all of the dozen or so burns that have been conducted over the past 25 years on your preserves, along with the CEQA required data that shows the "cumulative effects" of the fires.

Likewise, this kind of chart should be able to be produced for the EIR, to show the before-and-after

effects of grazing on the grassland habitat of EVERY preserve where any domesticated animal grazing projects have been conducted in the last 25 years?

Also, your EIR should be able to provide, for every preserve that has grassland natural resources, a vegetation cover censuses that were done at least every 5-10 years, so that the Board members and the public can see what the trends are, regarding the native grasses and wildflowers, and also show the different important grassland weeds and how they may be increasing over time.

You can see a grassland vegetation cover survey that I did in August, 2006 on nine of your District's grassland preserves, at https://www.ecoseeds.com/1-mid-pen-preserve-surveys.png
and measured the percentage native grasses, wildflowers, Harding grass and Yellow star thistle.

14 years ago in the areas of the preserves where I did my surveys, three of the preserves had good wildflower cover--Foothills Open Space had 39% cover in wildflowers, and Windy Hill 36% and Skyline Ridge 26%. But Fremont Older and Rancho San Antonio had zero, and Long Ridge, Monte Bello and Los Trances preserves my transects measured at 3-5% wildflower cover.

So, included in the EIR should be detailed grassland vegetation cover surveys, ideally that have been done once a year for the past 20-25 years, on every preserve with grassland habitat that currently needs to be managed for fire-fuel safety.

Without a significant amount of data showing the before-and-after data for the effects of the various prescribed burns that have been conducted over the last 25 years, or before-and-after vegetation cover data, for the preserves that have been grazed, then you and the public will not have enough information to determine if fires and grazing can legally be included as a fire-fuel management program in the future?

Since native grasslands and wildflower fields are our most Endangered ecosystems in California, your District needs to take much more care, and have enough data, so that you take special care of that resource, and stop making mistake like burning and grazing, that has caused the death of millions of native plants, and in some cases, cause parts of that rare resource, go extinct?

Without that extremely important "before-and-after data" plus periodic vegetation survey of your grassland resources, your agency could make the same mistakes over and over again, as was made in July 2007, when the burn at Russian Ridge cause the destruction of 2 million native plants, and they are only recovering now, 13 years later, picture of the burn, then the weeds swamping the wildflower the next spring at https://www.ecoseeds.com/1-mid-pen-2007-burn.png

Respectfully Submitted, Craig Dremann

From: Brian Malone
To: Brian Malone
Subject: FW: All Board Members - Board Contact Form
Date: Friday, July 10, 2020 9:34:37 AM

From: [redacted] <no-reply@wufoo.com>
Sent: Thursday, June 18, 2020 10:31 AM
To: Clerk <clerk@openspace.org>; General Information <info@openspace.org>
Subject: All Board Members - Board Contact Form

EXTERNAL

Name *	Craig Dremann
Select a Choice *	All Board Members
Email *	[redacted]
Location: (i.e. City, Address or District Ward)	East Palo Alto
Daytime Phone Number (if you wish to be contacted by phone)	[redacted]

Comments: *

Recently, I requested from the District managers, copies of all of the supporting "before-and-after" documents for the analysis of the effects of burns that have been conducted since 1996 on the District's grasslands, AND all of the supporting "before-and-after" environmental effects of grazing projects that have been done on the district's grasslands, and received only one document so far.

I requested these documents, so I could comment, if the district has sufficient data to be able to analyze those alternatives.

It is a very important part of CEQA, whenever a project is conducted that may have a negative impact on a resource, and that could cause severe and cumulative damages, that before-and-after monitoring is done for each project of that type, like fires in grasslands and grazing in grasslands.

Apparently the "Russian Ridge 2014 Pilot Vegetation Data" is the only supporting document for the Program to consider the alternative of using fires, to produce a goal of wildfire fuel reductions in the grassland portions of the district's preserves, but it is such a inadequate document, that it cannot be used to support that alternative.

The reasons are as follows: 1.) MOWING ALTERNATIVE NEVER INVESTIGATED but was PHOTOGRAPHED on page 21. The difference between where the areas had been burned in 2009 and not burned were insignificant when the study was done five years later, and the only area that was significantly improved, was the third alternative that has not been considered yet.

The photo on page 21 "Figure 14 shows LAYPLA and other forbs (including nonnative Erodium) persisting in a mowed road verge." And other than that photo, there is no other mention in the report, that the mowing produced the best results to produce a practically fire-fuel-free result! The results of the mowing shows that the flammable weed grasses are gone,

the wildflowers have returned, and essentially zero fire fuel, isn't that the whole goal of this program?

When you evaluate the 19 burned plots, the average amount of total exotic cover in the burned plots was 68% whether it had been seeded or not, whereas in the seven unburned plots, the average amount of flammable exotic cover was 71%, which are statistical dead-heats, and these comparisons were not disclosed anywhere in the report. Any burning in District grasslands, may temporarily rearrange the vegetation components in those grassland, but within five years or less, those grassland ecosystems resettle back to their original exotic cover conditions—because the fires never impact on the weed seeds already in the soil.

What was not evaluated is the best alternative, the mowing, that was fortunately photographed, producing dramatic and successful results. When you compare the unmowed are in the photo, it visually matches what the report is indicating, about an average of 80-85% exotic tall-growing fire-fuel plant cover, and you can see struggling in the weeds, the 15-20% wildflower and native grass component.

However, in the mowed area, close to zero fire-fuel weed grasses are seen, plus a lot of bare soil that is going to stop fires, then the low growing exotic Filaree and a lot of tidy tips that when they dry out for summer, produce close to zero fire fuel?

2.) Nothing in the report evaluates the POUNDS of FIRE FUEL per acre. The comparison was never made in the report, of any changes in the amount of pounds of fire fuel--only looked at the percentage of cover of each kind of plant. In terms of using this report for a fire-fuel reduction program, it is completely useless, as the picture on page 21 "Figure 14 shows LAYPLA and other forbs (including nonnative Erodium) persisting in a mowed road verge," is clearing showing the managers, the Board and the public.

The difference in the photograph of the cover of the low-growing filaree in the mowed area surrounded by wildflowers and bare soil, is very close to the lowest fire fuel you can produce in district grassland.

And when compared to the unmowed are in the photo's background are 2-3 foot tall flammable wild oats, and those wild oats are adding ONE TON of fire fuel per acre for every foot tall they grow each spring. The difference is close to zero for mowing—compared to burning or not burning, producing one ton of fire fuel per acre for every foot tall the exotics grow?

3.) EIR must be shelved, until fire-fuel per acre data is available for each alternative. Under CEQA a study is legally needed to be completed by the District, on the amount of FIRE FUEL per acre is produced by the different alternatives, before this EIR can legally move forward. This study only looks at changes in cover, which the burn really did not significantly change, and did not look at changes in the amount of fire-fuel per acre.

Currently, the district has ZERO studies that can be used to evaluate ANY alternatives that could be used to reduce fire fuels in the district's grasslands. And without the data to do the analysis of the alternatives, this EIR must be shelved, until the managers, Board and the public have that data, so the various alternatives can be fairly evaluated.

4.) NO GRAZING before-and-after DATA? Since the district apparently does not have any before-and-after grazing data, the public should assume that grazing will NOT be included as an alternative to fire-fuel reductions, because it cannot be fairly evaluated. And without that data, the current grazing projects may be illegal under CEQA, because no monitoring is being done each year, to see if the project is improving the native grass and wildflower resources, or severely damaging them.

And there have been no studies by the district, to measure in their grasslands, the amount of robbing of soil nutrients that the grazing is doing-- like soil organic matter, nitrogen, phosphorus and calcium-- When the cows uptake those nutrients to build their bones and muscles, could deplete the soil below the levels needed for native seedling survival, or potentially make damaging changes in the soil pH?

5.) Out of the 10 conclusions on pages 16-17 of the 2014 Russian Ridge report, only ONE of those, #8 can be used by the District for ANY grassland management projects, because there is no data presented in the report, and no references to data that exists elsewhere, to support any of the other management-action conclusions.

Conclusion #2 “Fire has provides higher quality grassland based on native species cover.” Not true, based on the data presented in this report, no significant statistical changes between burned and unburned.

Conclusion #3 “Seeding native perennial grasses in the early 2000s worked well, and had long-lasting effects (more than a decade). BROCAR and ELYGLA did the best.” However, no before-and-after data presented for those seeded area, whereas my vegetation transects in the north end of the preserve 2003-2020 indicate the original wildflower fields that existed were permanently damaged wherever those aggressive native grasses were sown. This is a case where massive environmental damages are being done, when the wrong native seeds are sown, to destroy the original resource that the District is supposed to not destroy under CEQA.

Conclusion #4 “For slopes too steep for drill seeding, hand seeding may be appropriate.” Once again, no CEQA analysis or before-and-after data, to show that native seeding of these aggressive native grasses are destructive to the very resource that the district is supposed to preserve and protect?

Conclusion #6 “Native annuals cannot effectively compete with non-native annual grasses without continual disturbance by fire and/or mowing, or the presence of naturally bare soils.” Absolutely ZERO supporting data for this conclusion, and since any evaluations of “Craig’s Special Mowing Method to Unearth Dormant Native Seeds” was not included in this report, then this conclusion is inadequate, because Craig’s Method DOES have native annuals compete with non-native annual grasses, WITHOUT continual disturbance by fire and/or mowing.

Conclusion #8 is the only management-action conclusion of this report that is correct, “Small-scale trials with mowing should be designed and executed, as this method can target non-native annual grasses and give suppressed perennials opportunities to expand and occupy more space.” This is one of the key features of “Craig’s Special Mowing Method to Unearth Dormant Native Seeds” that is able to unearth dormant native seeds still in the soil underneath the weeds, so they sprout up and take the place of the weeds, usually at 10-20 seedlings per square INCH.

Conclusion #9 “Hydromechanical obliteration (HMO) is an effective method for enhancing native perennial grasses and forbs where they are already present.” Not true, and no data presented here, plus no reference to data outside of the report. Measuring the results of the company writing this report, on their hydro-mechanical project at Edgewood Preserve, they could have presented that data to support this conclusion. However, when they conducted two plots in spring 2012, and within three years, the conditions went back to the same amount of exotic cover, 80-88%.

Any successful grassland management project in Central California should be producing a 20-25% increase in native plant cover each year, until you achieve between 90-98% native cover within 4-5 years. And when you get to that performance standard of 90-98% native cover, you essential have very close to zero fire-fuel that way.

10.) “In the long run, the only way to continually control non-native annual grasses is grazing, especially by cattle that selectively graze high nutrient annual grasses.” This is the most outrageous unscientific statement and conclusion I have ever read in any study, since I have been a professional restoring 800 acres of native grasslands in California since 1992?

No data is presented to support this massively sweeping conclusion. And, since I did not receive any before-and-after vegetation studies from the district for any of the grazing projects they have in progress right now, that indicates to the public that the district is not following CEQA in doing any before-and-after vegetation monitoring transects, to evaluate the successes or failures for those projects to achieve their goals, and to monitor the effects of grazing on the district’s resources?

Plus, the Conclusion #10 does not check for changes that grazing can produce in the soil nutrients and soil pH.

So MY conclusion for this EIR comment, is that the entire EIR process should be shelved, and the district conduct the proper studies for each of the alternative methods they want to utilize to achieve the goal of measured pounds-per-acre fire-fuel reduction in the native grasslands and wildflower fields of their preserves. Plus, there needs to be an analysis of the different methods, along with reduction of fire fuel, which ones produce the least damage to the native wildflower and native grass resources?

And the goal of this project, when it is conducted in any grassland habitat in the various preserve, should be stated as the recovery of the original wildflower fields and native grass cover, and as low as possible the percentage cover of exotics? That goal, or whatever goal this project is trying to achieve in district's grassland habitats, should be put up front. And then, the alternatives analyzed and the best method chosen, that will achieve the goal in the shortest amount of time, with the least amount of native resource damages?

Respectfully submitted, Craig Dremann CELL [redacted]

From: Jennifer Woodworth
To: Kirk Lenington; Coty Sifuentes-Winter; Brian Malone
Cc: Korrine Skinner; Ana Ruiz
Subject: FW: All Board Members - Board Contact Form
Date: Monday, June 29, 2020 8:49:57 AM

From: [redacted] <no-reply@wufoo.com>
Sent: Friday, June 26, 2020 3:39 PM
To: Clerk <clerk@openspace.org>; General Information <info@openspace.org>
Subject: All Board Members - Board Contact Form

EXTERNAL

Name *	Craig Dremann
Select a Choice *	All Board Members
Email *	[redacted]
Location: (i.e. City, Address or District Ward)	East Palo Alto
Daytime Phone Number (if you wish to be contacted by phone)	[redacted]

Comments: *

My reply to Coty's letter this week, who was replying to my Ombudsman email from six months ago, and I never heard from the district's ombudsman, ever---

Dear Coty,

Thank you for your six-page reply, to my questions that I submitted to your ombudsperson six months ago, and instead of writing those six pages, you could have answered in a single sentence—

"Our District does not have ANY Before-and-After measured data from any of our grassland management projects from any of our grassland preserves, which is a huge violation of CEQA, to be able to evaluate any of the various grassland weed management alternatives, for our Wildland Fire Resiliency Program EIR—Even though we have been conducting burning and grazing projects for 25 years without ever gathering any before-and-after measurements, to evaluate if those methods are working or could be potentially destroying, or having a cumulative negative effect on the very native grass and wildflower resources we are supposed to be protecting?"

Fortunately, since 2003, I have been gathering that data along the northern portion of Russian Ridge, that shows the Before-and-After effect of the illegal burn conducted by CalFire, that killed two million native plants, that were then replace by two million weed! And Mid-pen has no data to confirm or deny what I measured after that burn?

If your district does not have any before-and-after data for the past burn and grazing projects, how can you follow the CEQA guidelines at Cal. Code Reg. Title 14, Section 15355, where you are supposed to look at your projects and their "Cumulative impacts", which refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

I will reply to your different letter headings:

Reduction in California Grasslands – None of those items listed have been confirmed with scientific experiments and measured data, and are only speculations as to the reasons why there has been a 99.9% spatial extinction of the California grasslands and wildflower fields in California, and is now the most endangered habitat in our State.

The only way you determine what reasons actually did the destruction, is by restoring a grassland-wildflower field back to 95% or better native cover with diversity, then, you see why most of those reasons that you listed do not apply.

Midpen's Land Management – A lot of abstract words, but no on-the-ground before-and-after measured data or results of any grassland or wildflower field management.

Monitoring of Treatment Sites – Once again, you do not provide any on-the-ground and before-and-after measured data here? When I say that the burns caused the "extinction" of plants within my measured transect at Russian Ridge, I mean that within the transect route, native plants that existed before the burn, were killed within that route, and the fire causing the spatial extinction of that species in that area, that have never recovered since the illegal burns over the last 13 years.

Use of Prescribed Fire and Conservation Grazing – Once again, you are only presenting abstract theories on the effects of fires and grazing? Apparently you cannot supply any before-and-after data to support that these projects are improving the resources, even though your District has been conducting burns and grazing on your preserves for 25 years, may your district forgot to monitor those projects? Your district does not know, after 25 years of projects, if the burns and grazing have been destroying the resources, or as my before-and-after measured data is showing for the burns at Russian Ridge, is destroying the wildflower and native grass resources by the millions of plants?

Effect to Ecosystems due to Treatment – I am not generalizing on the effects of grazing, only that your district has no clue one way or another, because after 25 years of projects, have not even started to do the CEQA required before-and-after detailed vegetation transects, to determine what the results are?

And Mid-pen SHOULD expect to convert the weeds in the grasslands, back to the original wildflower fields and native grasses, because dormant native seeds exist under every square foot of your grassland preserves that were never plowed in the past, and in massive amounts, about 200 pounds per acre, that will come up and replace the weeds at 10-20 native seedlings per square inch.

That conversion is happening right now in the north end of Russian Ridge this summer, where I have been conducting my transects since 2003, native seedlings sprouting up because the wild oats seedlings could not sprout during the February-mid-March drought this spring.

Soil Nutrients – Once again, no before-and-after soil nutrient studies done before and after grazing, PLUS no before-and-after burn soil tests done either on any of the Mid-pen preserves, even though you have been conducting projects for 25 years?

It is a huge stretch in your letter, to refer to studies in Kansas—we are not in Kansas anymore--I started working on grasslands in Kansas last year, and there is ZERO comparisons with California grasslands for nutrient, soil organic matter, plant species, and rainfall patterns. Now, if your district repeats that Kansas experiment and had some measured data, that might mean something, but pulling that Kansas data out of thin air, does not mean anything until it has been tested on your district's grasslands.

Seed Bank – Referring to a 1997 study was written before my paper was the first ecological restoration project in the nation, to discover over 100 dormant native species in June 2002 for the cover article of the Ecological Restoration journal

at https://www.ecoseeds.com/shaw.pdf -- and we estimated those native seeds were between 100 and 250 years old—including two that were unknown to science.

Plus, we discovered there was a massive amount of those dormant seeds in the soil---enough on Michael Shaw's 70 acres at 300 Byers Lane in La Selva Beach—that the whole property went from 99%-weed covered to 95% native covered in only a few years, without sowing a single seed? All of the projects I have done since Shaw's in grassland and former wildflower fields in California, ALWAYS have dormant native seeds in the soil, and the seedlings in places will be as thick as 10-20 seedlings per square inch.

Fuel Levels – Once again, not a single measurement from any of your grassland and wildflower field areas of what the different areas produce in terms of fire fuel?

If you go out and measure the wild oats on any of your preserves right now, after for every foot tall they grow, produces 2,000 pounds of fire fuel per acre. Whereas, a field of tidy tips and native grasses, will only produce 100 pounds of fire fuel per acre. So, at Russian Ridge wherever you allow the wild oats to grow three feet tall, you have 3 TONS of fire fuel per acre vs. only 100 pounds if you still have the wildflower fields instead.

And, your district has never done any measurements with a recording pyrometer—Where you remove an intact square foot of the different grassland vegetation in summer, and set it on fire in a safe place, and record the duration and temperatures that the different fire fuels produce? Then, you can accurately, compare the higher temperatures and durations produced by the exotics vs. the very fire-safe natives?

Tubbs fire – The fire was initially spread by the weed grasses within the oak woodlands, and my cousin Mitch saw that weed grass straw--that had been cut earlier in the year but still laid on the ground--burn his neighbor's home to its foundation in the Bennett Ridge subdivision east of Santa Rosa.

Next Steps – "Although you have indicated that you do not desire to provide the District the necessary information on your land management technique" --- that is completely untrue. We have been in discussions for two years, to try my method on a small scale, but the answer has always been, that you do not have the money—Then, usually about a week after you tell me that, I get a post card that you are giving a $450,000 contract to another company?

You have also only last month, put up more barriers to ever trying my method, and here are the comments I wrote to the Board, about Mid-pen putting up barrier to getting a license and testing my special mowing methods—

Your District managers, have intentionally kept my method out any of the CEQA alternative analyses, whenever you review all of the alternatives for grassland management projects.

In the May 21 letter from Coty Sifuentes-Winter wrote, "As new science, technologies, and/or methodologies become available, Midpen staff reviews data and analysis to determine whether it can be applied to Midpen's land management."

But the District managers know that this statement is completely false, because my method has never been reviewed or tested, ever since your District managers learned about the method and visited the Shaw project site over 20 years ago?

Now, the District is placing new barriers, to exclude my method in the current analysis, when Coty wrote in his May 21 letter, "The science needs to be reproducible, scalable, and practically applied uniformly by District staff, contractors and partners" and that is no problem, because my methods have been used to restore 800 acres of California grasslands so far, and within ten years or less able to bring those grasslands back to close to 100% native cover?

And, the other arbitrary barrier that the District is placing, to not include my method in the EIR analysis, is when Coty wrote, "Midpen..can only broadly adopt new management techniques once they reach a level of general scientific

acceptance.”

That is not any excuse, for not including my method within the current EIR analysis—there are 800 restored acres worth of my projects in California today? And any ecological restoration professional, could quickly compared each of those projects, with the unrestored weed patches that exist just beyond the borders of those projects—and see within the boundaries of the projects the excellent and diverse native cover that was produced, using my alternative methods?

As a comparison, none of the operating systems and none of the computer programs and none of the apps that any of the Mid-Pen land managers have loaded into any of your agency computers or any of your smart phones--none of those needed to jump over that arbitrary barrier, of being “broadly adapted, only after they reached a level of scientific acceptance.”

You loaded all of those operating systems, and programs, and apps., and you agreed to a licensing agreement, and then, you run those systems, programs and apps, because they worked. You did not need any scientist to sprinkle any holy water on those computer items, before you accepted them for use?

And then, in the May 21 letter, Coty put up a third barrier between my alternative method, and your District--in that someone ELSE must sprinkle scientific holy water on my method, before your District will consider it or include it as an alternative?

Coty wrote: ”Once demonstrated to be scientifically accepted and reproducible by others proven techniques may then be eligible for increased funding based on Midpen budget priorities.” (I added the underlines).

CONCLUSION—Your district, your EIR currently MUST be shelved, because you do not have any data, to in order to evaluate the different alternative methods for grassland and wildflower for your proposed Wildland Fire Resiliency Program.

Your district MUST start producing their own before-and-after burn and grazing project-measured results. That data should have been collected over the last 25 years of conducting those projects, as CEQA requires, so if you start now, you might be able to continue with this EIR in 3-4 years.

And when you continue with your EIR, your district absolutely must include my method as one of the alternatives when you do your review, but I do not see any movement by you district to negotiate to obtain a license to test my method now or in the future? Only last month, three arbitrary barriers was put up by you, that my method must be scientifically accepted and reproduced by others, before your district will test it? And then for the last two year, your district has been broke?

Sincerely, Craig Dremann CELL [redacted]

Midpeninsula Regional OpenSpace | Midpeninsula Regional Open Space District

GENERAL MANAGER
Ana M. Ruiz

BOARD OF DIRECTORS
Pete Siemens
Yoriko Kishimoto
Jed Cyr
Curt Riffle
Karen Holman
Larry Hassett
Zoe Kersteen-Tucker

July 22, 2020

Dear Mr. Dremann,

Thank you for contacting the Midpeninsula Regional Open Space District (Midpen) Board of Directors (Board) numerous times in June. This letter is in response to emails you submitted to the Midpen Board on June 4, June 5, June 18, and June 26, 2020.

On June 4, 2020, Midpen received and fulfilled your request for before-and-after cover transect data for grassland management work (see Attachment 1). Within Midpen's written response, staff also noted as a reminder that data on past projects was previously provided to you over the years dating back to 2003. Additionally, staff has requested clarification on your most recent request for new transect cover data, which you have not yet provided. To help us provide you with the correct additional information, please clarify whether you are requesting additional new records or another copy of the prior data we have previously provided to you in prior years. Please notify the District Clerk with the specific types of documents that you are seeking to ensure delivery of the documents of interest. In further response to your inquiries on Midpen's grassland monitoring efforts, Senior Resource Management Specialist Coty Sifuentes-Winter has prepared an informational memorandum to the Board regarding the *Inventory and Monitoring of Vegetation on Midpeninsula Regional Open Space District Lands*, which is also attached to this response for additional relevant context (Attachment 2).

Please note that Midpen staff forwarded your Board correspondence on June 5, 2020, June 18, 2020, and June 26, 2020 (in addition to the May 24, 2020 correspondence) to the Project Manager for the Wildland Fire Resiliency Program to be included in the compilation of public comments received on the Notice of Preparation for the Environmental Impact Review (EIR) process. Staff is reviewing all comments received from the public related to the EIR and responding appropriately as part of the California Environmental Quality Act (CEQA) process. Of particular note, Midpen respectfully disagrees with your statement that it should not proceed to analyze the Wildland Fire Resiliency Program because of how Midpen has analyzed monitoring data on its own lands. It is clearly established under California law that Midpen's EIR must evaluate *a range of alternatives that will <u>feasibly</u> meet the project objectives*. CEQA does not establish any absolute legal imperative as to the scope of alternatives to be analyzed in an EIR. Midpen will consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation as part of the EIR that is under preparation.

Furthermore, while your request to include your "Special Mowing method to Unearth Dormant Native seeds" in the EIR as an alternative has been noted, please be aware that the EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative. Rather, the range of alternatives required to be evaluated in an EIR is governed by a "rule of reason" -- the EIR will evaluate a range of alternatives to permit a reasoned choice. What constitutes a "reasonable range" will be guided by the purpose of evaluating those alternatives that confer substantial advantages over the project proposal while meeting the project objectives (including resource enhancement to fire dependent species), which may be "feasibly accomplished in a successful manner" considering the economic, environmental, social and technological factors involved (See California Pub. Res. Code sections 21002, 21061.1 and CEQA Guidelines section 15364). Feasibility in the context of grassland management under the Program for Midpen must consider annual direct costs, annual staff resource requirements, net habitat benefits, and ability to effectively replicate the tools, practices, and approaches across more than 10,000 acres of grassland habitat on Midpen preserves.

Again, it should be clear that Midpen intends to fulfill its obligations to provide a thorough and legally robust evaluation of alternatives under CEQA, and its responses to public comment will be incorporated into the draft Program and CEQA documentation where appropriate.

Sincerely,

Board President Karen Holman

CC: Board of Directors
General Manager Ana Ruiz
Senior Resource Management Specialist and Project Manager Coty Sifuentes-Winter
Attachments

1. Staff Response to Public Record Act Request [Letter to Craig Dremann]
2. Board Informational Memorandum on the Inventory and Monitoring of Vegetation on Midpeninsula Regional Open Space District Lands

Midpeninsula Regional OpenSpace | Midpeninsula Regional Open Space District

June 15, 2020

RE: Request for "Cover Transects"

Dear Craig Dremann,

Midpen received your request for more information via the Board Contract Form on June 4, 2020. This letter serves as an initial response to inform you that we are compiling the records you requested, and to ensure that we provide the information that you are seeking. You requested data on before and after "cover transects" for sites where Midpen has conducted 1) prescribed fire, 2) conservation grazing, and 3) "no project".

Please note that Midpen provided you the data on Russian Ridge on July 29, 2009 per your request from July 20, 2009. Let me know if you would like us to provide that data again.

Since that time, we have collected additional data via a contract with Creekside Center for Earth Observation (https://creeksidescience.com/). This report is attached.

Annual transects are only one of many ways to monitor grasslands. Among other things, Midpen also prepares an annual Integrated Pest Management Report to the Board of Directors. Please see this link for the latest report available on the District's website: https://www.openspace.org/sites/default/files/Midpen_IPM_Annual_Report_2018.pdf.

I will review Midpen's electronic files and provide all records of cover transect data, but I do not believe Midpen has this data in electronic form. Midpen's older documents maybe in paper form and are not available electronically. Request for copies of document is subject to a charge of $0.10 per standard letter page and I will let you know in advance of the costs of reproduction. I will contact you within two weeks with any electronic records as well as the costs for reproduction of documents.

Respectfully,

Coty Sifuentes-Winter, Sr. Resource Management Specialist

csifuentes@openspace.org
Pronouns: he, him, his
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A greenbelt system in the San Francisco Bay Area comprised of over 60,000 acres in 26 preserves
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