



October 12, 2020

Dear Midpeninsula Regional Open Space District,

Wildfire Resiliency is a challenge to which the entire community must respond. The Woodside Fire Protection District's and the Town of Portola Valley's shared goal is to bring the community together by educating, facilitating communication, conducting code enforcement, and assisting in the implementation of mitigations to improve wildfire resiliency. The Midpeninsula Regional Open Space District is a stakeholder in the community.

Prevention must be proactive, and we are thankful MROSD is pivoting some of its energy into creating an internal wildfire resiliency plan for its lands. However, the Town of Portola Valley, its residents, and the WFPD recognize that such long-range planning must be accompanied by regular, annual basic hazardous fuel maintenance efforts within its preserves. It is our collective sense that the lack of such maintenance is being held up, in part, by MROSD's insistence that the wildfire resiliency plan and its accompanying EIR work be completed first. Maintenance of fuels is exempt from CEQA. Acting on this issue will help decrease the rate of spread and intensity of a fire if an ignition occurs and gives our emergency crews a fighting chance to stop the fire before it gets into Portola Valley.

Dead and dying vegetation along trails, roads, and perimeters, has accumulated over many years into an overwhelming amount of hazardous fuel in the preserves and lands owned and operated by MROSD in Portola Valley. This accumulation can only intensify and increase the rate of spread of any ignited wildfire. The community of Portola Valley is making valiant efforts to harden their homes and property. The town has been engaged in roadside vegetation fuel reduction for many years, and has over the last two years greatly increased these efforts, and is currently preparing to strengthen its building codes and local ordinances to battle the challenges of the new normal for California's wildfires. The WFPD is initiating new fuel reduction and shaded fuel break projects every month and our neighborhood chipping program is larger than ever.

MROSD has been entrusted with the stewardship of its preserves, and by not performing these basic maintenance efforts, jeopardizes this land as well as the neighboring residential communities in which it collects its revenues. Quantity of land has taken priority over the quality of care for much too long. Instead of incorporating basic best practices and fire prevention orientated protocols such as removing canopies of downed trees, fallen limbs or removing dead vegetation near roads and structures, it appears that MROSD has simply pushed this material to the side or watched it fill in and amass to something we consider extremely hazardous.

The WFPD has the duty to enforce the adopted fire code and to remedy any fire hazards in which public or firefighter safety is an issue. The last few years have been a sad awakening to all Californians of the immense vulnerability to wildfire in our communities. The consequent liabilities seem immense as we continue to see structures and lives lost each year from massive conflagrations.

MROSD has received written notification from WFPD and Cal Fire as well as from the Town of Portola Valley Conservation Committee regarding lack of maintenance in Windy Hill. It is our perception that MROSD has not heeded these requests in a timely manner, and appears (as described above) to be conflating such efforts with its wildfire resiliency plan. In the meantime, the community continues to voice criticisms and complaints.

We felt it necessary to write this letter jointly as previous attempts to highlight these risks have not been followed up with concrete action. Additionally, we share the concerns raised by residents of the Sequoias assisted living facility over the dense vegetation that envelops Windy Hill, which is closely adjacent to them. The Sequoias is a fragile and high priority facility within our community.

Instead of debating time and time again why MROSD cannot do the hazardous fuel maintenance and code-required defensible and perimeter space fuels mitigation, the Town of Portola Valley, the community, and WFPD requests that MROSD provide us with a plan to begin such annual maintenance as soon as possible. Now is the time to be proactive and engage in regular, necessary fuel maintenance mitigation work, and any further delay by MROSD will only increase the intensity and rate of spread of any fire ignited within the preserve and will spread the fire to the private and public lands within Portola Valley.

The areas of concern, based on our observations and from conversations with many community residents, are the Windy Hill trail head at the Sequoias; maintenance on Windy Hill perimeter property lines adjacent to Alpine Rd and PV Ranch; Betsy Crowder trail maintenance including the reduction of coyote brush and scotch broom; the limbing up of trees and removal of sprouted nonnative vegetation near Willowbrook and Alpine; maintenance work along the access road behind the Sequoias all the way to Alpine Rd. We all know the fire-prone traits that eucalyptus possess, and removal of such trees usually provides a substantial benefit in ember control and radiant heat intensity.

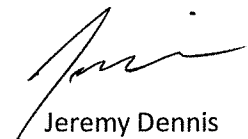
We hope this letter will help MROSD initiate these maintenance mitigation measures and become compliant with the regulations for defensible space and perimeter clearing.

Sincerely,

Don Bullard



Fire Marshal  
Woodside Fire Protection District



Town Manager  
Town of Portola Valley

cc: MROSD, Board of Directors  
MROSD, General Manager  
PV Conservation Committee  
PV Emergency Preparedness Committee  
PV Wildfire Preparedness Committee  
PV Town Council  
Sequoias Director



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

October 28, 2020

To: Woodside Fire Protection District and Town of Portola Valley

Re : Vegetation Management at Windy Hill Open Space Preserve (Windy Hill)

Dear Fire Marshal Bullard and Town Manager Dennis,

Midpeninsula Regional Open Space District (Midpen) is in receipt of the joint letter by your two entities dated October 12, 2020, that raises concerns for which Midpen would like to take the time through this response to ensure that the Woodside Fire Protection District (WFPD) and Town of Portola Valley (Town) are well informed regarding Midpen's vegetation and fuel management programs. Through this letter, we also offer opportunities for our organizations to work more closely together on these activities. Working with fire agencies and surrounding communities to strengthen the prevention of, preparation for, and response to wildland fires for enhanced ecosystem resiliency and public safety is one of Midpen's strategic plan objectives. Protection and restoration of the natural environment is a central principle to the mission of Midpen. Through sound science, interagency coordination and cooperation, engaging with neighbors and adjacent communities, and assessing needs and priorities, Midpen implements its mission to steward the land in its care on behalf of the public.

Midpen has a strong history of ecologically-sensitive vegetation management activities that meet the fuel maintenance objectives requested by both WFPD and the Town:

- Annually mowing the meadow north of the Sequoias along Portola Road (usually in May of each year after the grass has cured).
- Clearing 100 feet around the northern and eastern boundary of the Sequoias buildings (per Fire Marshall Don Bullard), while also maintaining a buffer to Sausal Pond
- Mowing and masticating along Spring Ridge Trail (south of the Sequoias buildings) to the junction with the Sequoias Trail (20-30 feet on each side of the trail).
- Extending work completed by the Sequoias on their southern boundary by mowing grassland south of the boundary to the Sequoias Trail.
- Roadside brushing (10 feet on either side) along over 2.5 miles of the Spring Ridge Trail all the way to Skyline Boulevard.
- Installing and maintaining a series of three disc lines that intersect the Spring Ridge Trail (these are planned to be converted to a non-shaded fuel break per the WFPD in future years).
- Maintaining a disc line along Highway 35 in grasslands.
- Maintaining the Old Ranch Road/Lauriston Road by repairing landslides and clearing 10 feet on either side of the road to provide access for emergency vehicles.
- Clearing a firebreak and staging areas at the Hawthorns property, mowing along access roads (20 feet on either side), removing dead trees, installing disc lines around 1/3 of the perimeter, maintaining defensible space around structures, and internal mowing to remove invasive, non-native yellow star thistle.

- Roadside brushing (15 feet on either side) of the access road from Alpine Road at Willowbrook Drive to the Spring Ridge Trail.
- Closing preserves during recent red flag events.

In addition to the ongoing fuel and vegetation treatment work that is completed each year, Midpen is finalizing a comprehensive Wildland Fire Resiliency Program (Fire Program) that covers nearly 60,000 acres of Midpen-managed lands to equitably prioritize and distribute fire and fuel treatments across its 26 open space preserves. I am happy to report that work on our comprehensive Fire Program has not delayed any of Midpen's annual vegetation management work. To the contrary, the work done in Windy Hill Preserve as detailed above has increased in the last two years. Through the new Fire Program, Midpen is pursuing a science-based effort that incorporates input from a vast number of stakeholders to identify and prioritize site specific treatments across all Midpen lands.

It is important to note that Midpen's jurisdiction is quite vast, with lands located within three counties, many multiple fire districts and agencies (including WFPD, Santa Clara County Fire Department, Los Altos Hills County Fire District, CALFire, Palo Alto Fire Department, Menlo Park Fire Protection District), two fire safe councils, and countless communities, towns, cities, and neighborhood associations (including 17 cities). As you can surmise, with this number of stakeholders interested in Midpen's fuel management activities, Midpen must work closely with all stakeholders to prioritize its limited funding, staffing, and contracting resources. This has been the approach taken in preparing the Fire Program's draft Vegetation Management Plans for each preserve, including the plan for Windy Hill (see Chapter 4 [Vegetation Management Plan](#)). As you may recall, the prioritization criteria used in this analysis to set the framework for ongoing discussions was provided to WFPD for review during development of the Fire Program. Application of these science-based and publicly vetted criteria resulted in the priority treatments that are now shown within the draft Vegetation Management Map for Windy Hill (Attachment 1) and Treatment Prioritization Map for Windy Hill (Attachment 2).

For priorities not reflected in the draft Vegetation Management Plans, the Fire Program describes an annual process by which communities, fire agencies, and other key stakeholders can propose additional work. As such, we will continue to depend on all stakeholders coming together annually to review the Vegetation Management Plans in light of existing, changing conditions to further prioritize the highest needs and risk areas across Midpen lands. We urge you to be active and engaged participants in these ongoing and future stakeholder discussions – the next meeting of which is being scheduled in Spring 2021 to develop the vegetation treatment workplan for 2021/22. The best outcomes can only be achieved when all the key people come together, evaluating the various levels of risks and need areas to determine those that annually rise to the highest priorities.

Recognizing that Midpen has a finite level of annual resources to pursue vegetation treatments, we will also be seeking grant funding opportunities and partnerships to accomplish more of this work. We hope that both the WFPD and Town are willing partners in accomplishing this work and see opportunities ahead to leverage our combined staffing and funding resources. And at the same time, we also know that this work requires everyone's participation, particularly for lands in the wildland-urban interface. Just as it is critical for Midpen to protect its natural resources from catastrophic fire damage, private property owners also play a significant role in protecting their private properties from fires through structures hardening and defensible space clearance. Local jurisdictions, like the Town and WFPD, are also key in preventing, preparing, and responding to potential fires by ensuring proper roadside clearance, designating and maintaining evacuation routes, and ensuring proper levels of suppression capacity. We are all in this together.

A recent and excellent example of a Midpen-community partnership is a current project underway that was initiated by the Sequoias. They reached out to Midpen expressing interest in removing eucalyptus trees in proximity to their private property. A portion of the trees are situated within a priority area for fuel treatment under the draft Fire Program. Midpen had already done an initial evaluation of the environmental impacts of this tree removal and is scheduled to complete this work in November of 2020. Additional eucalyptus removal that lies outside the Fire Program's priority fuel treatment area are currently being reviewed and when feasible will also be removed with the assistance of a generous private donation (certain details are being addressed, including neighbor permission to access the trees). We are thankful for the opportunity to partner with local community residents to accomplish more of this work and meet mutual goals. As you know, Midpen as a public agency must

remain mindful of how public tax dollars are utilized. We are careful to spend tax dollar funds on high priority projects that further Midpen's mission for protecting the natural resources; and much of this work also has the secondary benefit of improving fire protection and response for local communities. We do, however, rely on partnerships and outside funds when the primary benefit for the work is to protect private property.

Midpen is appreciative of the recent Town and WFPD effort to "ban the flammable five", and encourages the Town to request all property owners to remove these trees when in proximity to structures, as well as to provide grant opportunities for both private and public entities to do so. To further the goals of fire protection, Midpen also looks to the Town to regulate new construction, requiring new structures or additions to be sufficiently set back from property lines to allow private property owners to complete their defensible space requirements within their own parcel. Nonetheless, Midpen continues to provide its long standing [Defensible Space Permit Program](#), allowing neighbors to enter Midpen lands to complete up to 100 feet of defensible space clearance from their private occupied structure, and encourages the Town and WFPD to disseminate knowledge of our permit program to Town residents.

The draft Environmental Impact Report (EIR) for the Fire Program is scheduled to be released in January 2021 with EIR certification and adoption of the program in May/June. For the upcoming Spring 2021 interagency fire meeting to prioritize Midpen's fuel treatment work, we encourage the Town Wildfire Preparedness Committee to work with WFPD to bring forth your key priorities so that these can be evaluated amongst other regional priorities. We look forward in continuing to work with both the WFPD and the Town as we all move forward together to pursue this important work.

As a reminder, our Skyline Area Manager Craig Beckman is normally your primary contact for vegetation management work. However, if you have concerns that remain unresolved, please contact General Manager Ana Ruiz. We understand that specific concerns raised in your letter had not been directly communicated to Ms. Ruiz and ask that you please also reach out to her as needed.

We truly look forward to future partnerships and discussions as it is clear, with a changing climate and longer fire season, we all must elevate our fire prevention, preparedness, and response actions. Finally, I would like to leave you with a note of pride for our staff who actively worked to hold the recent CZU Fire from travelling further east and into the Towns of Portola Valley and Woodside. We are very appreciative that CALFire Division Chief Rich Sampson recently commended Midpen Rangers and Maintenance staff for successfully holding the northeastern fire line along the Old Haul Road near Pescadero Creek. Midpen is fully aware of its role as a regional partner in preventing, and in recent experience responding to, wildfires. Their courageous work protected countless homes and properties, as well as the vast acreage of critical sensitive habitat that we steward on behalf of the public.

Sincerely,

Karen Holman  
Board President

cc:

Midpen Board of Directors  
Ana Ruiz, General Manager  
Town Conservation Committee  
Town Emergency Preparedness Committee

Town Wildfire Preparedness Committee  
Town Council  
Sequoias Director

Attachment 1: Existing and Potential Treatments Windy Hill (from Fire Program)

Attachment 2: Treatment Priorities Windy Hill (from Fire Program)

Also refer to the complete Draft Vegetation Management Plan at:

[https://www.openspace.org/sites/default/files/Ch\\_4\\_VegetationManagementPlanrev.pdf](https://www.openspace.org/sites/default/files/Ch_4_VegetationManagementPlanrev.pdf)

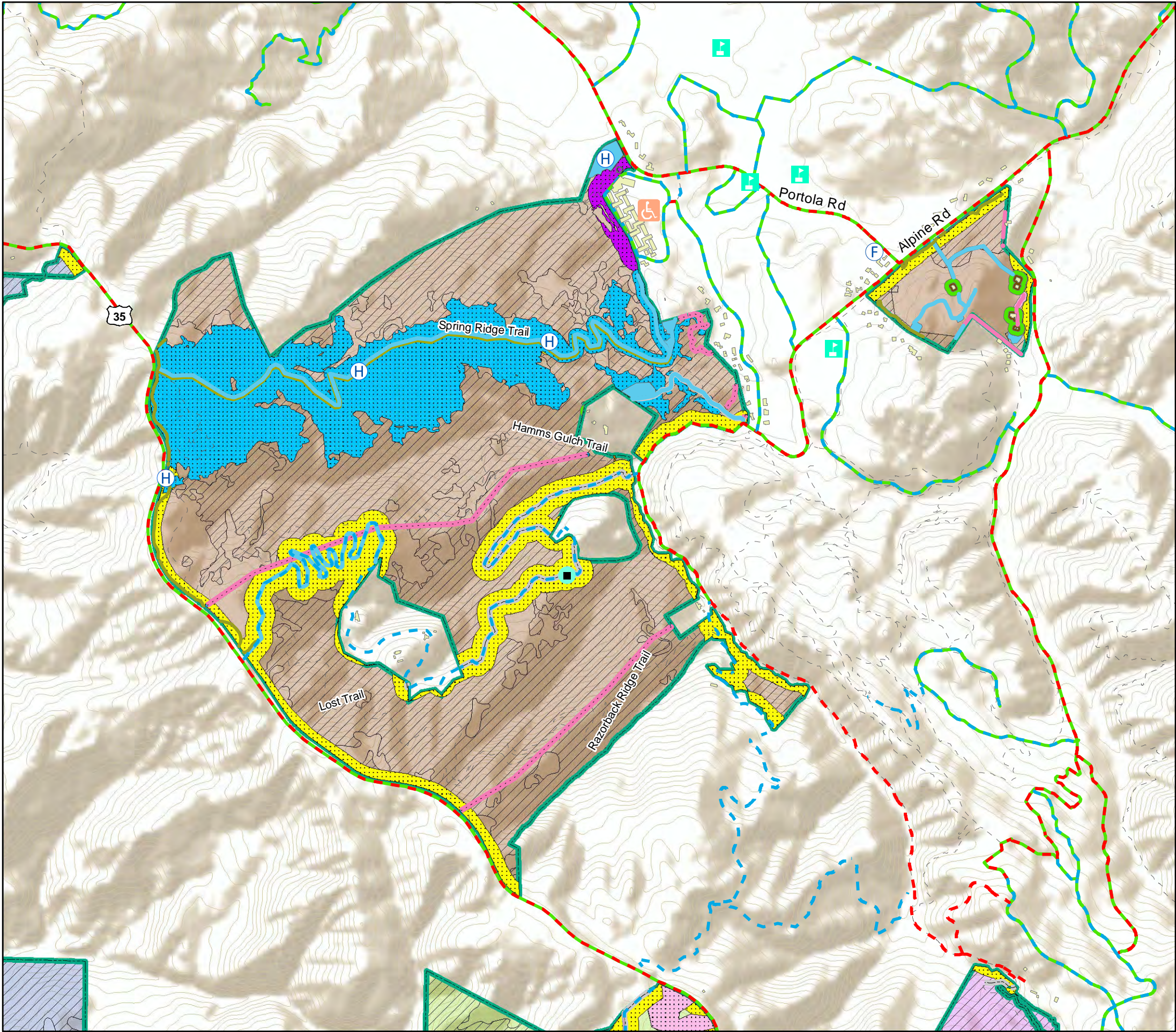
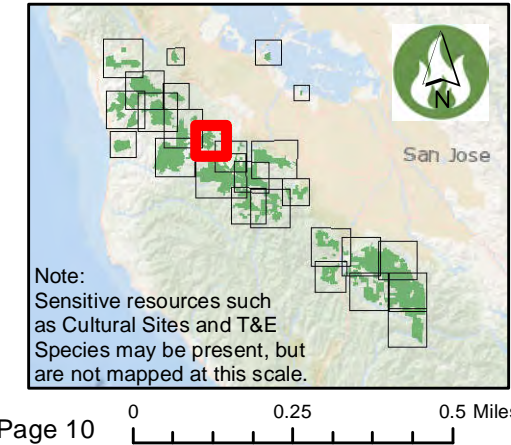


# Existing and Potential Treatments

## Windy Hill



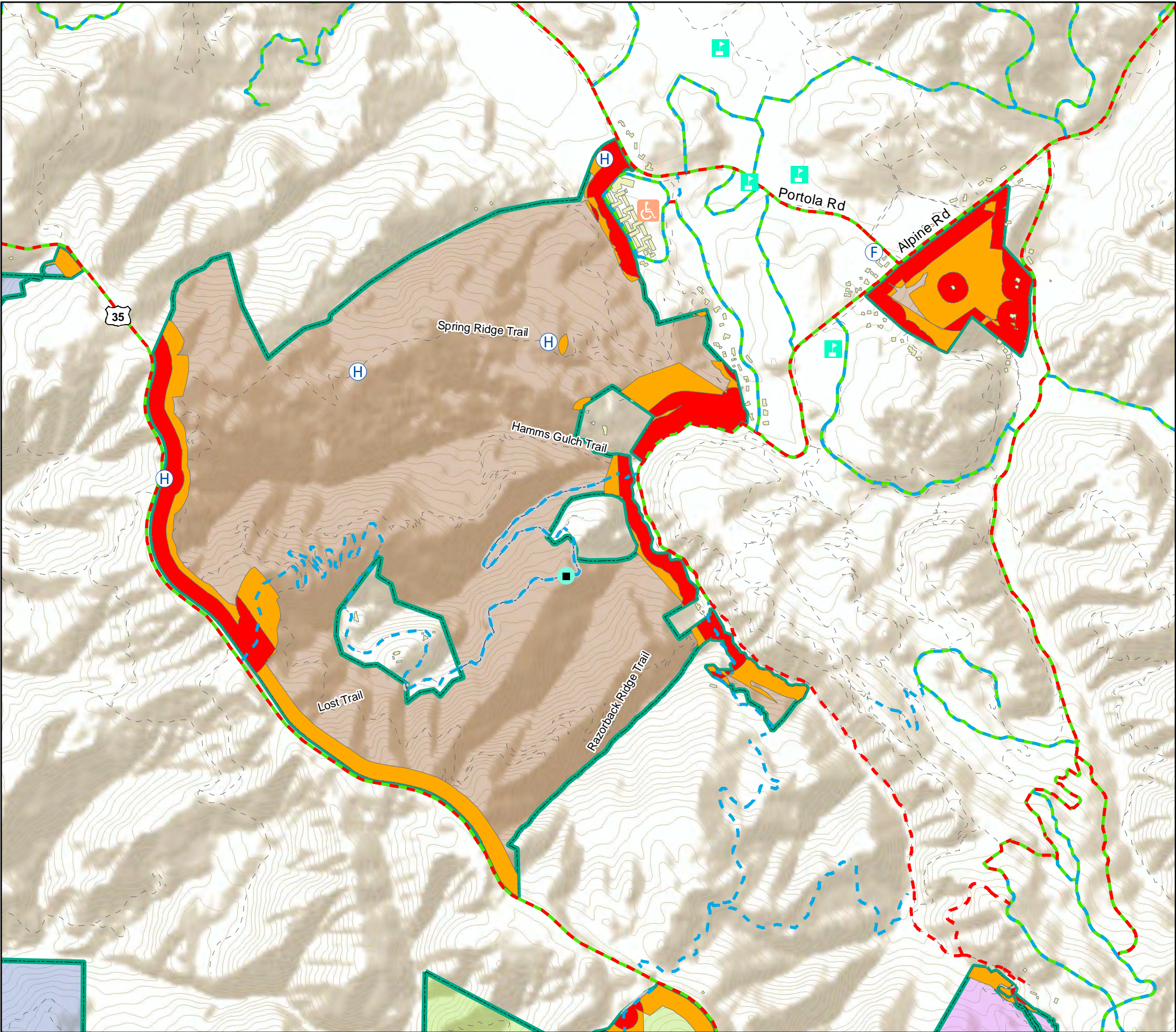
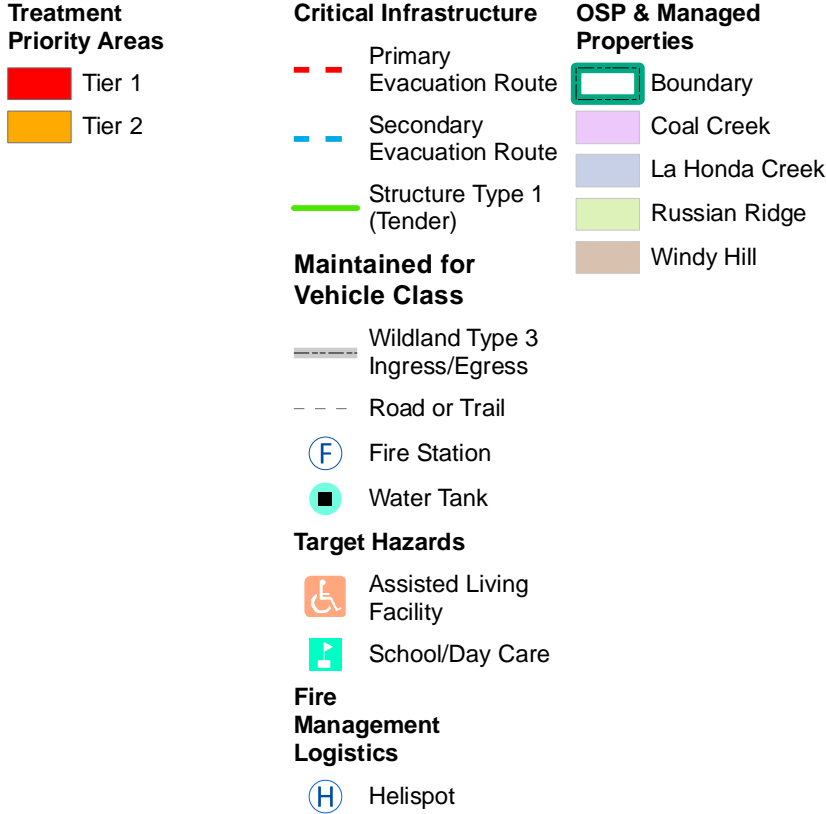
\* See Table of Contents page for additional symbology.  
\*\* Fuel break widths are maximums. Fuelbreaks may be constructed at any width up to the maximum width.





# Treatment Priorities

## Windy Hill



\* See Table of Contents page for additional symbology.  
\*\* Fuel break widths are maximums. Fuelbreaks may be constructed at any width up to the maximum width.

