

PRESCRIBED FIRE PLAN

3.6.3 Burn Planning and Design Requirements and Potential Measures

Prescribed burns are required to adhere to regulations and any Midpen-specific permits and environmental compliance, which will be noted in the Burn Plan. All stipulations relevant to prescribed burning in the latest Native Endangered and Threatened Species Recovery Permit (Recovery Permit) for California red-legged frog (CRLF) or San Francisco garter snake (SFGS) issued by the U.S. Fish and Wildlife Service (USFWS) are relevant. Relevant stipulations include but are not limited to required burn windows¹ when conducting a prescribed burn in suitable CRLF and SFGS habitat, reasonable attempts to leave refugia, and notification of USFWS prior to a burn. Midpen certified the Program Environmental Impact Report (PEIR) for the Program, which included the programmatic PFP, in May 2021 (Midpen, 2021). The certified PEIR consists of a variety of mitigation measures and Midpen best management practices relevant to burning that must be adhered to.

Burn Plans may incorporate additional unit-level best management practices (BMPs) as needed to address local resource protection or other concerns at the unit level. These BMPs include specific precautionary actions to minimize the potential for erosion following a burn, reduce smoke during a burn, control the burn, and preserve important ecological layers that exist at and below the ground surface. The following prescribed fire BMPs are examples that could be included in a Burn Plan (USEPA, 2019):

- Develop and implement a smoke management plan in accordance with current relevant local, CAL FIRE, and BAAQMD or MBARD guidelines;
- Develop and implement a firing plan that best meets unit-level resource objectives for vegetative cover;
- Utilize existing roads and trails for firebreaks where safe and feasible;
- Build waterbars and stabilize constructed control lines as needed to reduce direct erosion into streams;
- Limit the use of mechanical equipment for control line construction in riparian areas;
- Protect against excessive erosion or sedimentation to the extent practicable;
- Carefully handle and dispose of oil and fuel for equipment and vehicles. Spills, leaks, empty containers, and filters are potential sources of soil and water contamination if improperly managed;
- Develop and implement a spill contingency plan identifying all actions to be taken in the event of a chemical spill, including phone numbers for federal, state, and local agencies that must be notified; and
- Avoid constructing waterbars in control lines that divert surface runoff directly into streams.

¹ Burn windows are described as the period of time during which a prescribed burn may be scheduled for ignition.

