

1 Response to Comments

1.1 Introduction

Consultation and coordination with the Federated Indians of Graton Rancheria (the Tribe) have been conducted during the development of the PWP and are expected to continue during the development of projects to be authorized under the PWP (refer to Section 1.3 and Exhibit C of the PWP for a summary of the consultation processes). The PWP was revised to reflect input from the Tribe received after Board of approval for the PWP on September 18, 2025. Changes made to the PWP since Board approval are reflected in the PWP document as friendly modifications via grey highlighted ~~strikethrough~~ for removals and grey highlighted underline for additions. The page numbers and sections referenced in the responses to comments in this document refer to the version of the PWP with the strikethrough and underline friendly modifications included.

1.2 Public Comments

The Draft Public Works Plan (PWP) was circulated for a 6-week review period from July 18, 2025 to August 29, 2025. Email notice of the availability of the Draft PWP was sent to 273 interested members of the public and relevant agency or government contacts as well as 7 media agencies and libraries. These included the Marin Independent Journal, Community Media Center of Marin, Point Reyes Light, Point Reyes Free Library, Stinson Beach Free Library, Bolinas Free Library, and Inverness Free Library. Hard copies of the Draft PWP were provided to the Point Reyes Free Library, the Stinson Beach Free Library, the Bolinas Free Library, the Inverness Free Library, and the Marin Wildfire Prevention Authority (Marin Wildfire) office. A public meeting was held on August 5, 2025 at the Dance Palace Community & Cultural Center in Point Reyes Station. A presentation was also given to the Marin Conservation League on August 14, 2025. Materials provided during the public comment period and the public meeting are available here: <https://www.marinwildfire.org/project/draft-marin-county-forest-health-and-fire-resilience-public-works-plan>.

1.3 Comments Received

Marin Wildfire received 29 organization and individual letters from the public as well as comments from 13 individuals during the public meeting on the Draft PWP. The commenters are listed in Table 1.2-1. In addition to these letters, approximately 9,921 form letters were received. These are summarized in Section 1.4.4.

RESPONSE TO COMMENTS

Table 1.2-1 Comment Letters

Letter	Commentor	Letter Date
Organization		
A-1	Tomales Bay Forest Keepers	8/4/2025
A-2	Western Alliance for Nature	8/26/2025
A-3	Watershed Alliance of Marin	8/27/2025
A-4	Tomales Bay Foundation	8/28/2025
A-5	Marin Conservation League	8/28/2025
A-6	Inverness Ridge Association	8/28/2025
A-7	Ecologically Sound Practices Partnership	8/28/2025
A-8	ENVIRO-SPORTS Productions, Inc.	8/29/2025
A-9	Fire and Environment Resilience Network	8/29/2025
A-10	Marin Audubon Society	8/29/2025
A-11	TreeSpirit Project	8/29/2025
Individuals		
B-1	Suzanne Gooch	7/21/2025
B-2	Loura Richmond	8/3/2025
B-3	Robert Raven	8/4/2025
B-4	Karin Lease	8/4/2025
B-5	Lonna Richmond	8/4/2025
B-6	Andy Bunnell	8/5/2025
B-7	Kris Cedar	8/5/2025
B-8	Susan Dent	8/8/2025
B-9	Cheryl Higgins	8/14/2025
B-10	Steve Merlo	8/25/2025
B-11	Jinesse Reynolds, Tim Walch, Barbara Bogard, Nancy Okada, John Fernsell, Sharon Farrell, Abby Cunningham, Susan Hopp, Jean Harris	8/27/2025
B-12	Carolyn Hintz	8/29/2025
B-13	Christopher Anthony	8/29/2025
B-14	Cheryl Cormia	8/29/2025
B-15	Ginny Felch	8/20/2025

RESPONSE TO COMMENTS

Letter	Commentor	Letter Date
B-16	Yarrow Schley	8/22/2025
B-17	Karin Lease	8/29/2025
B-18	Abby Cunningham	8/29/2025
Public Meeting		
C-1	Andy Bachich	8/5/2025
C-2	Nancy Binzen	8/5/2025
C-3	Karin Lease	8/5/2025
C-4	Ken Levin	8/5/2025
C-5	Jack Gescheidt	8/5/2025
C-6	Kris Cedar	8/5/2025
C-7	Andy Bunell	8/5/2025
C-8	Fionna Mitchell and Gordon Mitchell	8/5/2025
C-9	Abby Cunningham	8/5/2025
C-10	Sashia Achilles	8/5/2025
C-11	Emily Bartlett	8/5/2025
C-12	Jennifer Howard	8/5/2025
C-13	Felix Chamberlain	8/5/2025

1.4 Response to Comments

1.4.1 Comment Group A – Organizations

Comment Letter A1: Tomales Bay Forest Keepers

----- Forwarded message -----
From: KPLease <wildflower@sonic.net>
Date: Mon, Aug 4, 2025 at 9:06 PM
Subject: PWP Draft Proposal
To: <info@marinwildfire.org>
CC: KPLease <wildflower@sonic.net>

Please tell me where your data is regarding the risks of your specific “management” protocol.

I’m interested in having access to research and data on the climate impacts of years of proposed mastication, the creation of new roads, loss of habitat and biodiversity, chain sawing and loss of living and dead standing trees and the application of thousands of gallons of herbicides that would be applied in the coastal zone.

I could find only one sentence that even mentioned climate and it was some superficial statement about how the loss of trees due to wildfire has impacted the climate, but nothing on the climate implications for this draft deforestation project.

A1.1

Without this data, no one can make an informed decision about the value of the proposal. We need this kind of study and data to know if this project inflicts more damage than it prevents. You can’t just use peoples’ fear of fire to justify such a far reaching project.

Does access to this study/data exist? If so, where can I find it? And if this hasn’t been done, I advise you to do it.

I applaud you for wanting to keep yourselves and your citizens safe and I found the home hardening section well done.

By the way, the website has many broken and empty links where the public might access important information. Kind of frustrating to use. The entire website seems like a giant advertisement for your proposed deforestation project with cherry picked data, but not what I am looking for.

Thank you,
Karin Lease
Tomales Bay Forest Keepers

RESPONSE TO COMMENTS

Response A1.1

The PWP is meant to provide a single document that establishes a framework for comprehensive planning, reviewing, and permitting of activities that would otherwise trigger the need for individual Coastal Development Permits. Proposed projects under the PWP may include mastication or use of other mechanical tools or removal of dead and dying limbs of trees or use of herbicides. Specific effects of any individual project will be disclosed in the future environmental compliance documents, which will include a discussion of cumulative impacts across the PWP Program Area as applicable. Refer to Response A3.5 for information regarding greenhouse gas emissions and carbon sequestration.

Projects proposed under the PWP would not create new roads. The types of projects and activities that would be proposed under the PWP are described in Section 3.4 Types of Projects and Activities to be Covered.

The commentor states that thousands of gallons of herbicides would be applied within the Coastal Zone. As described in the PWP, herbicides would only be applied to target invasive and non-native species when other methods of treatment are not feasible. Herbicides would be applied in a targeted manner, and the amount of herbicides used would be limited. The Coastal VTS requires herbicide use to be avoided to the maximum extent feasible and may only be used if such treatment activities are the least environmentally damaging feasible alternative and would not result in significant adverse impacts to sensitive ecological resources.

RESPONSE TO COMMENTS

Comment Letter A2: Western Alliance for Nature Comments on the Draft Marin County Forest Health and Fire Resilience Public Works Plan (PWP) in Coastal Marin County

René Voss <renepvoss@gmail.com>
To: marinwildfire-pwp@panoramaenv.com

Tue, Aug 26, 2025 at 9:28 PM

To Whom it May Concern:

The Marin Wildfire Prevention Authority (MWPA) was created by Measure C with a narrowly defined mission: to reduce wildfire risks and improve public safety through coordinated prevention, detection, evacuation planning, public education, and vegetation management. The measure was never intended to authorize or fund broad-based ecological restoration or forest health programs. Accordingly, any benefits to "forest health" must be incidental to wildfire prevention—not a primary or standalone purpose.

We are concerned that the Draft PWP strays from these limitations.

1. Measure C Does Not Authorize Forest Health as a Standalone Purpose

The text of Measure C is unambiguous. It states:

"It is the purpose and intent of this ordinance to impose a special parcel tax for fire protection and prevention services, including but not limited to vegetation management; wildfire detection; evacuation plans and alerts; grants; public education; defensible space and fire-resistant structure evaluations; and local-specific wildfire prevention efforts."

A2.1

This language is repeated in the implementing provisions, and the ballot argument reinforced the same intent, emphasizing:

"coordinated wildfire prevention including early detection, warning and alerts; reducing vegetation; ensuring defensible space around homes, neighborhoods and critical infrastructure; and improving disaster evacuation routes/procedures."

Nowhere does Measure C authorize projects whose primary or exclusive purpose is "forest health" or "ecological restoration." Forest health benefits may arise as a byproduct of properly designed fire prevention projects, but Measure C does not permit diversion of tax proceeds to projects that are not fundamentally about wildfire prevention.

2. MWPA's Expertise is in Fire Prevention, Not Ecological Restoration

We question whether MWPA has the professional capacity or scientific expertise to manage large-scale ecological restoration or forest health projects in the coastal zone. While the draft PWP accurately describes the ecological character of coastal Marin, MWPA is not an ecological agency and should not attempt to assume that role. Expanding its scope risks straying from its voter-approved mandate, duplicating the work of existing resource agencies, and creating confusion about accountability.

A2.2

The statement on page 3-33 is particularly troubling:

"To ensure that benefits to the environment are maximized through forest health and ecological restoration planning in the PWP Program Area, the majority of the total acreage of covered projects will be forest health projects."

This is a direct inversion of Measure C's intent. MWPA was not established to maximize ecological restoration acreage but to reduce wildfire danger to communities. A commitment to make "the majority" of projects forest health projects is both beyond MWPA's statutory authority and contrary to the will of the voters.

3. Risk of Forest Damage Under the Guise of "Restoration"

Because MWPA's mission is fire reduction, there is a danger that ecological claims will be used to justify vegetation removal or other interventions that may in fact harm forests and ecosystems. Without a clear fire-prevention nexus, such

A2.3

RESPONSE TO COMMENTS

projects could degrade the very resources they claim to restore. MWPA should avoid this mission drift and focus exclusively on projects with demonstrable wildfire prevention benefits.

A2.3

4. Recommendation

We urge both MWPA and the California Coastal Commission (CCC) to restrict the PWP in the coastal zone to projects that are clearly and primarily wildfire prevention measures. Any ecological or forest health benefit must be incidental, not the primary goal. To do otherwise would exceed MWPA's authority under Measure C, misallocate taxpayer funds, and undermine public trust.

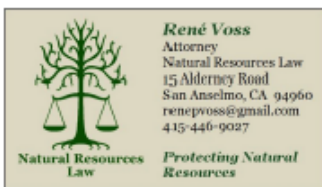
A2.4

René Voss

Executive Director - Western Alliance for Nature (wanconservancy.org)

Attorney - Natural Resources Law

415-446-9027



Response A2.1

All projects proposed under the PWP and funded by Marin Wildfire would be designed to be consistent with Measure C. Page 3-34 of the PWP states that projects include “necessary fire resiliency objectives”, which indicates that fire resiliency is essential to all projects. Direct or indirect ecological benefits are not a requisite objective and would be achieved “to the greatest extent feasible” (page 3-34). Refer to page 3-31 for a diagram of the types of treatments that are specifically proposed. All forest health projects, which are described as ecological restoration projects on pages 3-31 and 3-32 of the PWP, would address wildfire resiliency objectives through the following: moderating uncharacteristic wildland fuel conditions to reflect historic vegetative composition, structure, and habitat value; and the removal of weedy and invasive species and the removal of diseased vegetation, with an emphasis on moderating uncharacteristic fuel build-up due to the deprivation of natural fire regimes. These projects would continue to reduce wildfire risk in accordance with the language in Measure C. Note that other project types listed, such as wildland-urban interface (WUI) fuel reduction and fuel breaks, may also address forest health objectives indirectly but would primarily address wildfire risk. Studies have shown that fuel reduction activities can have beneficial effects on understory vegetation, species richness, invasive species reduction, and native plant communities (Dodson et al. 2008). Vegetation treatments can be beneficial for fuel reduction as well as facilitating stand structure resilience to wildfires (Stephens et al. 2012). Understory species diversity and richness can increase following prescribed burn and vegetation thinning treatments (Dodson et al. 2008; Odland et al. 2021).

RESPONSE TO COMMENTS

Response A2.2

The PWP was developed in coordination with Marin County, fire agencies, technical advisors, scientists, the California Coastal Commission (CCC), California Department of Parks and Recreation (California State Parks), and other partners. Future projects would also reflect the input from these agencies and partners where necessary. Furthermore, over the last 5 years, Marin Wildfire has worked with its member agencies to conduct more than 40 different projects across Marin County. Because of this experience as well as Marin Wildfire's ongoing coordination with additional agencies, partners, and technical advisors, Marin Wildfire has the capacity and expertise to conduct projects that increase wildfire resiliency and promote forest health.

Response A2.3

Marin Wildfire's mission is to lead "the development of fire adapted communities using sound scientific, financial, programmatic, ecological practices, vegetation management, community education, evacuation and warning systems with the support of its member and partner agencies." The project types and analysis contained in the PWP—including WUI fuel reduction, fuel breaks, and ecological restoration—reflect this mission and, by extension, the language in Measure C in Marin County.

Response A2.4

As discussed in Response A2.1, all projects and project types that would be proposed through the PWP would clearly address wildfire risk but would also address forest health objectives because the two goals are overlapping rather than mutually exclusive.

Comment Letter A3: Watershed Alliance of Marin

Please find our comment letter on Draft Marin County Forest Health and Fire Resilience PWP.

Laura Chariton, President, Watershed Alliance of Marin

446 Panoramic Hwy.
Mill Valley, CA 94941
415 234-9007
cell 415 855-5630

 Cmts on Marin County PWP 8-14-25 (1).pdf
384K

RESPONSE TO COMMENTS

August 14, 2025

To: MWPA Executive Board of Directors, MarinWildfire PWP
Re: Comments on Draft Marin County Forest Health and Fire Resilience Public Works Plan (PWP)

We are writing to express serious concern about the PWP draft's plan to fast-track ten more years of reliance on Cal Fire's California Vegetation Treatment Program (CalVTP). This approach is increasingly out of step with current fire science and field data from institutions like UC Irvine, UCLA, Cal Poly, and the U.S. Forest Service, which show that the most effective wildfire protections are structure hardening, Zone Zero defensible space, and community preparedness. Large-scale vegetation treatments including thinning, understory removal, and remote fuel breaks have repeatedly failed to stop wind-driven wildfires—and often worsen the problem by degrading ecosystems, releasing carbon, and diverting funds from proven strategies.

We respect MWPA's mission and leadership, especially its focus on Zone Zero and supporting transparency. But the foundation of this plan warrants closer scrutiny. The Cal Fire 2024–2025 case studies cited on the "PWP Draft" notice page are vague, possibly incomplete, and fail to reflect major legal and scientific developments from the last five years. **Before proceeding, we owe it to both our communities and our ecosystems to pause, reassess, and course-correct.**

A3.1

The evidence is clear: up to 90% of homes lost in wildfires ignite from wind-blown embers. ***"To slow fire spread, neighborhoods must function as fuel breaks rather than fuel sources. Primarily, they must resist ember attacks as wildfire approaches. Then the structures and the space between must also serve to break the chain of fire spreadthrough flame contact and radiant heat. Unfortunately, the lessons of past conflagrations in urban settings have not been applied to our residential neighborhoods in materials and design."*** ([The Return of Conflagration in Our Built Environment](#) Giammanco et al., 2023)

The PWP must be revised to reflect the latest, data-driven insights—not vegetation management strategies that are no longer effective. Marin has a responsibility to lead with a smarter, more targeted approach—one that directs resources toward what actually reduces risk: structure hardening, defensible space, and community preparedness. It's time to stop wasting funds on the ineffective vegetation treatments outside the 100' defensible space zone and invest in the solutions that truly protect lives, homes, and ecosystems.

Community Protection - A New Perspective is Needed

"All such projects and reforms must recognize an important truth: The current wildfire management approach has inverted the wildfire problem. Wildland fires do not, per se,

RESPONSE TO COMMENTS

encroach on communities. Rather, it's communities that have impinged on wildlands, where fires play an important ecological role. Predominant strategies continue to apply limited, risk-averse reactions that emphasize community protection at the expense of both resilient landscapes and safe, effective wildfire responses. Forward-looking ecological and practical thinking would help move communities away from continually degrading fire-adapted ecosystems and underinvesting in community resilience. Instead, this change in thinking will move toward a sustainable approach that consistently promotes ecological and human ecosystem benefits." (December 2023, PNS, [Wildland-urban fire disasters aren't actually a wildfire problem](#))

A3.2

Yet, the PWP still prioritizes wide-scale vegetation removal in wildlands, a strategy that has shown little benefit in wind-driven wildfires while degrading ecosystems and diverting funds from high-impact solutions.

Reducing Fuels - Two Different Strategies

The PWP conflates two very different goals: reducing fuels to protect communities and promoting long-term forest and ecosystem health. **In reality, these goals often require very different strategies, and when they are lumped together under the same plan, it can lead to unintended consequences—namely, habitat degradation, soil disruption, and ineffective wildfire protection.** ([When Active Management of high conservation value forests may erode biodiversity and damage ecosystems](#)", 2025, David Lindenmayer, *Philip Zylstra, Chad T. Hanson, Diana Six, Dominick A. DellaSala):

A3.3

- **Soil health loss:** Pile burns of prescribed fires exceeding 600°C, kill mycorrhizal fungi, microbial life, and seedbanks for years. **Mechanical thinning, mastication, and bulldozing of compact soil**, disrupt hydrology, and **destroy the mycorrhizal networks and fungal hyphae** that regulate water and nutrient flows and support tree and understory regeneration (Beyers et al., [USDA 2018](#)).
- **Wildlife impact:** Brush piles provide critical nesting, shelter, and foraging habitat for birds, reptiles, and small mammals—yet many are incinerated without adequate wildlife protection, even after so-called "careful" inspections by biologists or hand crews. In reality, these checks often miss hidden nests and den sites, resulting in the silent destruction of countless non-target species.
- **Carbon loss:** The Draft Plan echoes Cal Fire's claim that removing vegetation through thinning and prescribed burning preserves carbon by preventing wildfires. However, this assertion is based on a **critical and well-documented miscalculation**. According to Cal Fire's own **Fire and Resource Assessment Program (FRAP)**, the **annual probability of wildfire in most forested regions of California is just 0.5% to 1.5%**, even in high fire severity zones projected through 2050. This means that in over **98% of forested areas**, the fuel wouldn't have burned at all in any given year—so the carbon stored in those trees and shrubs would have remained intact.

A3.4

A3.5

RESPONSE TO COMMENTS

- Even more troubling, research published in *Ecological Applications* and by forest carbon modelers such as [Buchholz et al. \(2021\)](#) reveals that **any short-term carbon benefits from preventing fire can be quickly erased** by what's called "carbon reversal risk"—when fire still occurs, or when the treatment itself releases more carbon than it prevents. This flaw has been exposed in **California's forest carbon offset market**, where credit assumptions have collapsed under scrutiny due to **inflated risk models and real-world reversals** (CarbonPlan, 2022; Minnesota Forest Resources Council, 2021).

A3.5

By removing vegetation that is unlikely to burn—then counting it as a carbon savings—is not only scientifically flawed, it's fiscally irresponsible. These claims do not account for carbon losses from cutting and soil disturbance, nor do they factor in the high probability that treated areas will not burn at all within the next several decades. Instead of spending millions to degrade carbon-rich ecosystems under the guise of "wildfire protection," Marin County should prioritize **structure hardening, near-home defensible space, support landscape stewardship**, which deliver both climate and community resilience benefits that are **measurable, durable, and grounded in real risk.** [Beverly Law's 3/9/22 The Status of Science on Forest Carbon Management to Mitigate Climate Change and Protect Water and Biodiversity](#)

- **Type conversion:** In fire-adapted ecosystems like chaparral, mechanical thinning and repeated disturbance break natural regeneration cycles and open space for invasive grasses and weedy shrubs. This shift—known as type conversion—replaces complex, carbon-rich native plant communities with highly flammable, fast-burning vegetation, increasing fire frequency and intensity while eroding biodiversity, soil health, and watershed stability. Once this conversion occurs, it is often irreversible.

A3.6

"Resilient Environments - Requires Healthy Ecosystems

- **High biodiversity, healthy soils, and layered habitat complexity**—the foundation of resilient, self-sustaining ecosystems that support native species, pollinators, and long-term ecological health.
- **Natural fire cycles**, not artificial openness created by thinning and vegetation clearance—which disrupt ecological balance, fragment wildlife corridors, and increase vulnerability to invasive species and erosion.
- **Carbon storage**, maintaining living trees, shrubs, and undisturbed soils—not accelerating carbon loss through cutting, pile burning, and soil disturbance that release stored carbon and undermine long term climate goals.

A3.7

Instead of reducing risk, these treatments often create new vulnerabilities—including erosion, invasive species, and habitat fragmentation. By relying on CalVTP's fuel-first approach, the PWP risks turning carbon-rich, biodiverse landscapes into degraded ecosystems with reduced fire resilience and climate benefits.

Herbicide Use is Unnecessary and Harmful

The PWP is extremely vague in its language on the use of herbicides. Exhibit A, “h”, pg A-5 states; **Limit Herbicide Use.** *“Herbicides shall be avoided to the maximum extent feasible and may be used only if such treatment activities are the least environmentally damaging feasible alternative, while still achieving project objectives, and will not result in significant adverse impacts to sensitive ecological resources (e.g., when used to control invasive species). Dab or paint methods of herbicide application shall be preferentially used over wand or other targeted spray methods of application, where feasible.*

According to CalVTP guidelines—and confirmed by MWPA public warning signs—highly toxic herbicides like glyphosate, and triclopyr are actively being used in vegetation management. These are systemic chemicals, designed to be absorbed into the entire plant, all the way to the roots. But they don’t stop there. An estimated 20% seeps into the surrounding soil, where they destroy vital microbial life that plants, trees, and entire ecosystems depend on. **These herbicides don’t just kill weeds and invasives—they unravel the living systems these plans are supposed to protect.**

The danger goes far beyond the target weeds and invasive plants. Scientific studies show that herbicides pose **serious health risks** to humans and wildlife—even at extremely low doses. Glyphosate, for example, is a known endocrine disruptor and was added to California’s Prop 65 list of carcinogens in 2017. Unlike traditional toxins, endocrine disruptors don’t follow the rule that **“the dose makes the poison”**—they can be harmful even in minuscule concentrations. Herbicides also contaminate waterways, bioaccumulate in the food chain, and harm pollinators and other non-target species through drift, runoff, and erosion.

A3.8

The environmental and health risks of herbicide use include:

- **Acute and chronic toxicity**—eye, skin, respiratory, and gastrointestinal harm.
 - **Damage to non-target species**—via drift, overspray, and runoff into aquatic ecosystems.
- Endocrine disruption and bioaccumulation**—including effects from so-called “inert” ingredients, which are often unregulated but highly toxic.

Given the proven success of herbicide-free vegetation management by MMWD—who steward 22,000 acres, including fire-prone forests on Mt. Tamalpais—there is no justification for MWPA to continue using toxic chemicals. The PWP must reject CalVTP’s outdated herbicide allowances and instead commit to ecologically sound, non-toxic practices that prioritize public and environmental health. MMWD’s approach shows that effective, fire-resilient land management without herbicides is not only possible—it’s already happening. MWPA should follow their lead and explicitly prohibit herbicide use, abandoning the permissive frameworks of CalVTP and Integrated Pest Management.

RESPONSE TO COMMENTS

Legal and Scientific Incompatibility

In 2025, [The Chaparral Institute v. Board of Forestry ruling](#) (2024) declared CalVTP inadequate under CEQA because it failed to **analyze ecological impacts of vegetation conversion** and lacked **evidence of efficacy** in reducing fire risk.

- **No demonstrable evidence of effectiveness** in reducing wildfire risk or protecting communities
- **Neglect of cumulative and site-specific ecological impacts**, including harm to native habitats and biodiversity
- **Systematic misuse of CEQA exemptions**, allowing large-scale vegetation clearance to bypass environmental review and permits

A3.9

The current PWP, as written, risks repeating many of these vulnerabilities. Marin residents deserve that MWPA seriously considers these findings to rethink the reckless PWP 10 year fast track of fuel reduction treatments that need updating.

A Better Path Forward

We urge MWPA and the Executive Board to:

1. **Update the PWP by aligning with the latest fire science, accurate carbon accounting, and up-to-date post wildfire data and empirical studies**—not outdated treatments that no longer reflect on-the-ground realities.
2. **Prioritize more funds and more [financial support for structure hardening](#) and Zone Zero defensible space** especially in high priority fire prone areas.
3. **Reduce the reliance on CalVTP- guided fuel reduction practices, which have been repeatedly shown to offer negligible protection during high-intensity, wind-driven wildfire events**, while causing significant ecological degradation and carbon loss.
4. **Separate forest health from wildfire suppression objectives**, and reject one-size-fits-all approaches that ignore ecological variability and site-specific fire behavior.
5. **Adopt MMWD's herbicide-free standard** to protect public and environmental health.

Marin's PWP must be updated to reflect the latest fire science and on-the-ground outcomes—not outdated strategies that are failing to keep pace with today's escalating wildfire risks. The evidence is clear: smarter, more effective approaches are needed to truly protect both our communities and the wildlands we rely on. We've documented the impacts of MWPA vegetation/fuel reduction projects firsthand, attended wildfire forums

RESPONSE TO COMMENTS

at the state and local level, and reviewed the latest post-fire data and research. What we've seen confirms it's time to shift course. We're ready to provide additional data and resources to support this change—because public safety, ecological health, and responsible use of taxpayer dollars depend on a strategy that actually works.

Respectfully,

Jinesse Reynolds, San Anselmo
Tim Walch, Corte Madera
Barbara Bogard, Mill Valley
Nancy Okada, San Anselmo
John Fernsell, San Anselmo
Sharon Farrell, San Rafael
Abby Cunningham, San Anselmo
Susan Hopp, Mill Valley
Jean Harris, Novato

cc Mark Brown
Anne Crealock

Additional References:

1. UC Irvine – Field Experiments on Ember Behavior

Researchers at UC Irvine conducted detailed field studies in the Sierra Nevada to analyze how embers (firebrands) travel and ignite structures. They confirmed that embers can carry long distances into landscaping and buildings—and that home hardening features like ember-resistant vents and noncombustible materials directly mitigate this risk [CalMatters+2Inside Climate News+2San Francisco Chronicle+2NIST+1The Guardian+1](#).

2. UCLA – Post-2025 Los Angeles Fires Analysis

UCLA's report following the January 2025 Los Angeles wildfires made clear that **large-scale shrubland fires are generally unstoppable during high winds**, and that landscape-scale fuel reduction had little effect on limiting overall damage. Importantly, the study emphasized three proven protection strategies:

1. **Home hardening**—resistant building materials (e.g. shingles, vents, siding),
2. **Zone Zero defensible space**—near-home vegetation management, and
3. **Community preparedness** [arXivThe Guardian+2ResearchGate+2AP News+2](#).

3. Infrastructure & Ember Risk Studies

Multiple investigations—by UCI, USFS, NIST, IBHS, and FEMA—have consistently shown that **embers are the primary ignition source for structures in wind-driven wildfires**, not surface fuels. They highlight that **ember-resistant vents, non-flammable landscaping within 5–20 ft**, and improved building codes dramatically reduce structure loss [engineering.uci.edu+2US Forest Service+2ibhs.org+2](#).

4. US Forest Service & USGS Research – Wind vs. Fuel Fires

Jon Keeley (USGS) and Alex Syphard (USFS) categorize modern California wildfires into two types. Most of the most destructive fires are “wind-driven,” not fuel-driven—meaning that **thinning and fuel removal in wildlands offer little protection when Santa Ana or Diablo winds are igniting homes miles away** [ResearchGate+2USGS+2SpringerOpen+2](#).

5. Camp Fire Analyses & Defensible Space Findings

Studies like Mockrin et al. (USFS) and Syphard et al. (Cal Poly) consistently show that **homes with 5–20 ft defensible space and high-quality materials survive at much higher rates than those with fuel treatments farther away**. Defensible space beyond 100 ft is shown to add little additional protection, even on steep slopes [ibhs.org+3US Forest Service+3ResearchGate+3](#).

RESPONSE TO COMMENTS

6. Photos after the Los Angeles fires in January 2025 show many yards where vegetation didn't burn while neighboring houses did. AP Photo/Chris Pizzello
California's plan to ban most plants within 5 feet of homes for wildfire safety overlooks some important truths about flammability. [UC Santa Barbara, UC San Diego, 2025 study](#).

Response A3.1

The PWP does not preclude implementation of home hardening and defensible space through other programs and projects. Marin Wildfire understands that no single tool will resolve high wildfire risk in Marin County and therefore pursues a multi-pronged approach to wildfire resilience that incorporates large-scale home hardening and defensible space inspections, grants (particularly to support work in Zone Zero), and chipper services; public education; alerts and evacuations; and other programs in addition to targeted vegetation management activities. Refer to the Marin Wildfire website for information about other types of projects and programs similar to those identified by the commenter (<https://www.marinwildfire.org/>). Furthermore, as discussed in Response A3.2, the PWP is based on the most recent, widely-accepted literature regarding wildfire risk and the influence of vegetation treatments on this risk. Several useful case studies and peer-reviewed studies are available on the Marin Wildfire website (<https://www.marinwildfire.org/collaborations/science-and-research>).

Response A3.2

The determination that treatments referenced in the PWP would achieve the purpose of reducing wildfire risk and severity is supported by a substantial amount of research. A comprehensive meta-analysis shows that surface fuel treatments have a large and substantial effect on fire behavior, including reductions in canopy volume scorch, scorch height, and reductions in flame length (Martinson and Omi 2013). Residual tree diameter – the retention of large trees with the removal of smaller ones and surface fuels – is a primary predictor of treatment effectiveness, which is a typical strategy for projects proposed by Marin Wildfire. Under both modeled conditions and in analysis of real wildfires, reducing surface fuels followed by prescribed fire and/or pile burning have been shown to reduce flame lengths and burn severity (Moghaddas et al. 2018). Shaded fuel breaks specifically reduce surface and ladder fuels while retaining upper canopy and large trees (Low et al. 2023), and surface and ladder fuels are a driving force of severe wildfire as crown fires require heat and fuel sources from surface fires to be sustained (Thomas and McAlpine 2010). Shaded fuel breaks have been shown to reduce wildfire char, improve post-burn vegetation health relative to untreated areas, and decrease probability of torching (i.e., crown fire) of trees (Bajjnath-Rodino et al. 2023; Low et al. 2023). Although thinning of the understory may marginally increase wind turbulence in the understory itself, it does not affect turbulence in the canopy (Russell et al. 2018) and open wind speed at 10 meters above canopy height is generally predictive of wildfire rate of spread (Cruz and Alexander 2019). General reductions in fuel loading, decreases in probability of

RESPONSE TO COMMENTS

torching, and associated lack of increases in canopy wind speed would decrease the risk of severe wildfire such as a crown fire. Furthermore, fuel breaks can occur in concert with other treatments, such as defensible space and home hardening, to reduce fire severity and structure loss (U.S. Forest Service 2014). A more recent meta-analysis of 220 research papers concludes that treatments that include a reduction in surface fuels (i.e., thinning and removal of surface fuels via prescribed burning, pile burning, or manual/mechanical removal) reduce wildfire severity within treated areas by over 60 percent on average (Davis et al. 2024).

Response A3.3

As discussed in Response A2.1, projects would include “necessary fire resiliency objectives” while forest health projects would also be achieved “to the greatest extent feasible.” Page 3-2 of the PWP states that “while forest health projects are explicitly designed to directly improve both ecosystem health and the provisioning of other essential ecosystem services, fuel reduction projects should, where practicable, also be designed to directly improve ecosystem conditions (e.g., removal of exotic invasive plant species, management that mimics natural disturbance regime).” As further described in Response A2.1, the two goals of fuels reduction and forest health are not mutually exclusive and vegetation treatment projects can result in benefits to forest health. Furthermore, fuel reduction projects that cannot be designed to directly improve or restore ecosystems or ecosystem processes are expected to provide indirect ecosystem benefits by reducing the severity of future wildfires on ecosystems and the ability of those ecosystems to recover more quickly. Refer to pages 3-3 through 3-5 of the PWP for additional information on the approach of the PWP for balancing fuels reduction and forest health objectives. As noted on page 3-2 of the PWP, fuel reduction projects are designed based on the latest science to improve resiliency and emulate the effects of and allow for the opportunity to reestablish historic fire regimes.

Response A3.4

Chapter 6 of the PWP describes the procedures for reviewing and authorizing each individual project once proposed to confirm whether it is as consistent with the Marin Wildfire’s Forest Health and Fire Resilience PWP for vegetation treatment in the Coastal Zone that is carried out pursuant to the Board of Forestry and Fire Protection’s (Board of Forestry) final Programmatic Environmental Impact Report (PEIR) for the California Vegetation Treatment Project (CalVTP) or a different environmental compliance process. Specific environmental effects of projects considered through the PWP, such as to soil health and wildlife, will be disclosed in future environmental compliance documents. Section 6.3 provides the list of activities required prior to approval of each individual project which includes additional notification of nearby landowners and other interested parties which will provide the specific acres and rationale for each project as requested in the comment.

Note that all projects proposed under the PWP would be subject to the Coastal Vegetation Treatment Standards (Coastal VTS) in Exhibit A and the CalVTP Standard Project Requirements (SPRs) in Exhibit B.

RESPONSE TO COMMENTS

Response A3.5

As discussed in Response A3.4, specific environmental effects of projects considered through the PWP will be disclosed in future environmental compliance documents. For projects considered through the CalVTP PEIR, the CalVTP PEIR concluded that annual GHG emissions generated under the CalVTP would be potentially significant and unavoidable as part of the CalVTP PEIR's conservative analysis. Proposed projects, whether considered through the CalVTP or another compliance pathway, may affect carbon sequestration and the appropriate compliance document would disclose any of these effects to greenhouse emissions and carbon sequestration as relevant.

Marin Wildfire notes that wildfire risk in Marin County is "very high" or "high" as documented by the Fire Hazard Severity Zones in the Local Responsibility Area, as identified by the State Fire Marshal (Marin County 2025). Furthermore, the "coast is particularly vulnerable to catastrophic wildfires due to historic development patterns in [WUI] areas, departure from natural fire return intervals, long response times for first responders, strong winds, and resource management patterns" (page 2-3). Refer to pages 2-1 through 2-4 of the PWP for a discussion of the purpose and need as it relates to the PWP.

In addition, Marin Wildfire notes that there is evidence that treatments can improve carbon sequestration in forests. Recent research indicates that vegetation treatments improve carbon sequestration in remaining forests (Zhang et al. 2024) and that both younger and older trees increase growth rates after thinning (Marshall 2013; Latham and Tappeiner 2002). Even after considering the removal of thinned material as a loss of carbon, plots accumulate live tree carbon stocks similar to pre-treatment levels within 6 to 10 years and thinned stands accumulate aboveground live tree carbon at a faster pace (Mantgem et al. 2025). In addition, because future projects would reduce wildfire risk, they would reduce the likelihood of a severe wildfire burning carbon stocks in areas beyond any one specific project site.

Response A3.6

Chapter 6 of the PWP describes the procedures for reviewing and authorizing each individual project once proposed to confirm whether it is as consistent with the Marin Wildfire Forest Health and Fire Resilience PWP for vegetation treatment in the Coastal Zone that is carried out pursuant to the Board of Forestry's final PEIR for the CalVTP or a different environmental compliance process. Specific environmental effects of projects considered through the PWP, such as the likelihood of type conversion from a proposed project, will be disclosed in future environmental compliance documents. Furthermore, Coastal VTS 7.a.iii requires project proponents to "maintain vegetation cover and composition to comply with the standards (membership rules) set forth in the online edition of the Manual of California Vegetation (MCV) to avoid unintended habitat conversion; and provide for an appropriate mosaic of native plants by age, size, and class that support the specific habitat being treated" (page A-3).

RESPONSE TO COMMENTS

Response A3.7

As discussed in Responses A3.6 and A3.4, specific environmental effects of projects considered through the PWP, such as the likelihood of type conversion from a proposed project, will be disclosed in future environmental compliance documents. Changes to erosion rates, invasive species, and habitat fragmentation would also be disclosed in these documents and would be reduced through use of measures described in Exhibits A, B, and C of the PWP.

Response A3.8

The PWP allows the consideration of targeted herbicide application to address resprouting of invasive species when other methods are not feasible due to their costs, effectiveness, or potential environmental impacts. As discussed by the commenter, Coastal VTS 7.h states that herbicides “shall be avoided to the maximum extent feasible and may be used only if such treatment activities are the least environmentally damaging feasible alternative, while still achieving project objectives, and will not result in significant adverse impacts to sensitive ecological resources (e.g., when used to control of invasive species)” (page A-5). The treatment specifications and associated effects of this herbicide use will be disclosed in the future environmental compliance document. Marin Wildfire may, for example, dab herbicide onto a cut eucalyptus stump consistent with other land management agencies in Marin County to reduce regrowth. Section 6.3 provides the list of activities required prior to approval of each individual project, which includes additional notification of nearby landowners and other interested parties.

Response A3.9

The comment regarding the CalVTP PEIR legal challenge is noted. For informational purposes and as stated on the Board of Forestry webpage, on June 30, 2025, the Court of Appeal held that substantial evidence did not support the Board of Forestry’s findings that the CalVTP would avoid adverse effects of native chaparral and coastal sage scrub type conversion, including a potential increase in flammability of non-native grasses invading project sites after treatments. The appellate court remanded the case back to the Superior Court with directions to grant the writ and describe requirements for an adequate analysis of type conversion and its adverse effects. The appellate court also directed the Superior Court to decide if any specific vegetation treatment projects should be suspended pending the analysis directed by the writ. The Board of Forestry is preparing an update to the CalVTP Program EIR. With the current CalVTP PEIR Update underway, the Board of Forestry is planning to incorporate analysis directed by the writ into the PEIR Update, as stated on the following webpage: <https://bof.fire.ca.gov/projects-and-programs/calvtp-homepage-and-storymap/calvtp-update>. The Court has further directed that proposed CalVTP projects that would treat chaparral or coastal sage scrub may not proceed while the CalVTP PEIR Update is underway, except for certain critical safety projects falling within a limited set of treatment categories described on the Board of Forestry website. For proposed projects, until the CalVTP PEIR Update is complete and the writ is discharged, the 2019 CalVTP PEIR may not be used for CEQA compliance for proposed vegetation treatment in chaparral or coastal sage scrub, with certain exceptions for specific categories of treatment the Court found to be severable from the writ’s prohibitions (i.e., treatment may not proceed in

RESPONSE TO COMMENTS

chaparral and coastal sage scrub except as provided in the specific, limited allowances directed in the writ and listed below).

The court's decision only applies to projects being carried out under the CalVTP and relying on the CalVTP PEIR (i.e., projects in or adjacent to SRA for which a PSA and Addendum would be prepared). The ruling does not prohibit or limit all fire fuel reduction projects that may be carried out in sage scrub or chaparral. Additional environmental analysis documentation may be used to review and authorize proposed projects, such as a categorical or statutory exemption, Initial Study/Mitigated Negative Declaration or Environmental Impact Report.

Comment Letter A4: Tomales Bay Foundation



Dear Marin Wildfire Protection Agency (MWPA),

Thank you for your diligent work in both implementing on-the-ground initiatives and developing an administrative process that facilitates community wildfire hazard reduction. We recognize the importance of establishing shaded fuel breaks around coastal communities that are vulnerable to wildfires, especially where vegetation is dense and flammable.

We fully support the approaches outlined in the Public Works Plan (PWP) that the MWPA has thoughtfully prepared. The plan identifies a variety of excellent locations where communities will benefit from fuel reductions through manual and mechanical treatments, prescribed fire (both pile and broadcast burning), herbivory, and limited herbicide applications.

The Tomales Bay Foundation supports the PWP as a crucial step toward creating resilient forests and significantly reducing the risk of wildfire in West Marin.

Sincerely,

Tomales Bay Foundation Board

Tom Gaman, President & Registered Forester #1776

Tomales Bay Foundation
PO Box 447
Point Reyes Station, CA 94956

steward@tomalesbayfoundation.org

www.tomalesbayfoundation.org

A4.1

Response A4.1

The comment is acknowledged in support of the PWP.

RESPONSE TO COMMENTS

Comment Letter A5: Marin Conservation League



Marin Wildfire Prevention Authority
1600 Los Gatos Drive, Suite 335
San Rafael, CA 94903
By email MarinWildfire-PWP@panoramaenv.com

Subject: Marin Wildfire Prevention Authority (MWPA) Forest Health and Wildfire Resilience Public Works Plan

Marin Conservation League appreciates the opportunity to comment on and express our support for MWPA's Draft Forest Health and Wildfire Resilience Public Works Plan (PWP). It is our understanding that the Final PWP will be submitted to the California Coastal Commission (CCC) to serve as a programmatic environmental compliance and approval document ("streamlined vehicle") for implementing future vegetation treatment projects ("coastal development projects") within the program area over the next ten years.

We commend you for a thorough and well-written document! It is, however, a highly complex document, even for a public seasoned in the acronyms and procedures of environmental compliance. We have reviewed the draft PWP and have the following comments and suggestions for you to consider in a final version that is understandable and useful to the reviewing public.

1. In general terms, the purpose of the PWP is to conduct forest health and wildfire prevention treatments, using principles, strategies, and best management practices that align fire risk reduction planning with protection of coastal resources. These include Coastal Vegetation Treatment Standards (VTS), Environmentally Sensitive Habitat Areas (ESHAs), and other Coastal Act requirements.

As an overlapping and integrated purpose, the PWP will also cover projects intended to accomplish ecological restoration, fuel reduction in the WUI, and strategic fuel breaks, including standard project requirements and mitigation measures articulated in the California Vegetation Treatment Environmental Impact Report (CalVTP PEIR). The integration of purposes is shown in the Venn diagram (Page 3-30). To better illustrate these dual purposes and address other complexities mentioned below, MCL suggests that you consider graphing in matrix or linear-path form how the document will be used by the Coastal Commission (as well as the MWPA's interested public) to ensure that future projects comply with PWP and VTP standards over a period of 10 years.

A5.1

2. The purpose and types of projects and actions described in the PWP are consistent with Marin Conservation League's Policy Statement for Vegetation Management to Reduce Wildfire Risk. MCL's Policy recognizes that MWPA's approach is designed to restore and protect important ecological values of Marin's coastal native habitats at the same time that the risk of catastrophic wildfire to habitats, communities, and infrastructure is being reduced.

RESPONSE TO COMMENTS



3. The 44,000-acre area covered by the PWP in the Coastal Zone supports a complex mosaic of ^{3.4} land uses and interspersed forest, woodland, shrub land, and grassland plant communities.
 4. Substantial areas also have been taken over by invasive non-native plant species. MCL recognizes that the PWP will provide much needed active management towards the stewardship of these coastal resources. As we understand the process, the PWP framework will be supported by a Project Specific Analysis (PSA) to be produced by MWPA under the CalVTP, which will provide a high level of environmental protection during project implementation. The combination of Coastal Commission's VTS Standards and the CalVTP standard project requirements and mitigation measures and monitoring associated will ensure protection of the special ecological values within the program area.
 5. MCL is encouraged that prescribed burning is included in the PWP as a potential management tool and hopes that the method becomes a long-term tool for maintenance of treated forest stands as well as other habitats. We concur that the judicious application of herbicides to otherwise intransigent invasive species is on occasion the least environmentally damaging alternative treatment. This is consistent with principles of IPM, which MCL approves as it is currently applied by some local land managers. A5.2
 6. MCL believes there is need for a consistent approach across the county to monitoring and measuring, post-project, the effectiveness of vegetation treatments, especially to note any shifts in habitats or impacts on sensitive species, determine the threat of introducing invasive species in the wake of treatment, and to estimate treatment recurrence intervals. We believe WMPA has already demonstrated a high degree of cooperation with land managers, districts, and communities to develop and carry out informative monitoring protocols. A5.3
- Finally, MCL has deep interest in the health of forests, woodland, shrub land, and grassland communities of Coastal Marin. We also recognize the need for wildfire resilience and defensible space work in and around the small communities that dot the West Marin landscape. These communities contribute to the cultural fabric of the county. Therefore, we urge MWPA to provide the interested local public, as well as the broader environmental community, with regular updates on the PWP approval process and subsequent projects – their accomplishments, lessons learned, and future innovations. MCL would be happy to assist with providing a forum for interested public through our monthly online/in-person hybrid Parks and Open Space Committee meetings or other special speaking events. A5.4

Thank you for considering our comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Suggs".

A handwritten signature in dark ink, appearing to read "Ron B. Dennis".

RESPONSE TO COMMENTS

Response A5.1

Sections 6.3 and 6.4 of the PWP detail the process for reviewing and authorizing projects under the PWP, including development of a Project Specific Analysis or similar compliance document, preparation and submittal of Notice of Impending Development (NOID), CCC review of all prepared materials at a scheduling public hearing, and subsequent determination of consistency with the PWP. Refer to those sections for additional information on the review process.

Response A5.2

Prescribed burning, including pile burning and broadcast burning, as well as herbicide application are included as activities that may be used to implement projects and meet project goals and objectives. Refer to Response A3.8 for a discussion of herbicide applications.

Response A5.3

Section 6.5 summarizes the monitoring requirements for projects considered through the PWP. Marin Wildfire would provide monitoring reports in accordance with the requirements (i.e., SPRs and Mitigation Measures) of the CalVTP PEIR or similar compliance document.

Response A5.4

The project review process for projects reviewed under the PWP will include a variety of opportunities for public engagement through comment periods, public meetings, and Marin Wildfire Board of Directors meetings. Updates on the PWP process will be provided at the project website here: <https://www.marinwildfire.org/project/draft-marin-county-forest-health-and-fire-resilience-public-works-plan>. Future projects with specific environmental compliance documents will be posted on the Marin Wildfire website as well.

Marin Wildfire conducts a variety of education and outreach activities such as tabling at events or leading public field trips to project sites, identifies future projects in their annual work plans, and has regular meetings of the Marin Wildfire Board of Directors that the public can attend as well as other committees.

RESPONSE TO COMMENTS

Comment Letter A6: Inverness Ridge Association

The Inverness Ridge Association is a community organization representing the residents of Paradise Ranch Estates (PRE).

PRE is a community of approximately 150 homes in Inverness with one main artery for ingress and egress, Drakes View Drive. Forty-five homes in PRE were lost in the Mt. Vision Fire. PRE was under an evacuation warning during the Woodward Fire. Thanks to Marin Wildfire, residents are increasingly educated about wildfire behavior, defensible space, and Zone Zero, and have held evacuation drills twice in recent years with the participation of Marin County Fire Department, The Marin Office of Emergency Services, the CHP, County Sheriff and the Humane Society. We have very high participation in Marin Wildfire Chipper Days. Paradise Ranch Estates is a Firewise community.

The following are comments endorsed by the Association.

The Inverness Ridge Association recognizes the value of the vegetation management that Marin Wildfire proposes and the added safety that it will provide for our community. We endorse the approval of the Public Works Plan by the CCC to streamline the efforts of Marin Wildfire over the next decade.

The Inverness Ridge Association has two comments to clarify language in the PWP.

1. Amend PWP Purpose and Need (page 2-2) to read:

This PWP also creates a clear and agreed upon process for approval of individual projects submitted under the PWP that includes: Early consultation among applicable parties including Coastal Commission staff, Marin Wildfire staff, registered foresters or qualified professionals, fire agencies, local landowners and land managers, Firewise Committees, local communities, and tribal entities.

A6.1

2. Amend Program Description Section 3.7 (page 3-35) to read:

Marin Wildfire, including member agencies, will work with local landowners, CAL FIRE, technical advisors, fire safe councils, Firewise committees, tribal entities and local communities, Coastal Commission staff, Marin County planners and other partners to prioritize and develop projects that will be implemented over the life of this PWP. Marin County planners and other partners to prioritize and develop projects that will be implemented over the life of this PWP.

A6.2

Jennifer Howard, Chair Firewise Committee, Inverness Ridge Association
Leah Light, Chair, Inverness Ridge Association

RESPONSE TO COMMENTS

Response A6.1

Page 2-4 of the PWP has been revised to state “[e]arly consultation and/or coordination among applicable parties including Coastal Commission staff, Marin Wildfire staff, registered foresters or qualified professionals, fire agencies, local landowners and land managers, Firewise committees and local communities, and the Tribe.”

Project Standard 7 on page 4-5 of the PWP has also been revised to state “Firewise committees shall also be engaged to the extent feasible.”

Response A6.2

Page 3-37 of the PWP has been revised to state “Marin Wildfire, including member agencies, will work with local landowners, CAL FIRE, technical advisors, fire safe councils, Firewise committees, the Tribe and any other interested California Native American Tribes, and local communities, Coastal Commission staff, Marin County planners and other partners to prioritize and develop projects that will be implemented over the life of this PWP.”

Project Standard 7 on page 4-5 of the PWP has also been revised to state “Firewise committees shall also be engaged to the extent feasible.”

RESPONSE TO COMMENTS

Comment Letter A7: Ecologically Sound Practices Partnership

August 28, 2025

Dear Mark, Anne and Caitlin:

Thank you for the opportunity to comment on the Draft Marin County Forest Health and Fire Resilience Public Works Plan.

I appreciate the types and levels of documentation made available: Notice of Availability, presence on MWPA website and the consultant's report "Marin Wildfire Prevention Authority Marin County Forest Health and Fire Resilience Public Works Plan" (100 pages plus). This is excellent and facilitates understanding the Coastal Zone context, proposals, and project limitations. I was fortunate to attend the August 5 public session getting to listen to public comment and see your team in action.

My response has several parts: 1) suggesting reasons that this PWP should be looked upon favorably by the environmental and climate community; 2) shedding light on the MWPA and Ecologically Sound Practices Partnership (ESP) collaboration and 3) proposing ways ESP could be of help going forward.

Comments on Public Works Plan (PWP). We draw entirely from the MWPA website and the consultant's report, using your language in headings and explanations. Attached are the Reasons with brief explanations.

1. Coastal Marin is in need of the PWP
2. PWP makes sense for the Coastal zone, requiring a single document and a framework for comprehensive planning, permitting and review.
3. PWP responds to an urgent need for a coordinated, responsible and forward-thinking approach
4. Effective collaboration and coordination taking place at all stages of development and implementation
5. PWP provides a process for careful selection of future projects, especially important since the treated project area will be small.
6. PWP focuses on the range of fire prevention policies for making communities and landscapes wildfire resilient
7. The PWP enables project partners to design and implement multiple critical forest health, ecosystem restoration, and fire prevention projects throughout the PWP Program area
8. The range of proposed activities are intended to provide ecological benefit, either directly or indirectly, to the greatest extent feasible.
9. Common and distinct goals of forest health and fire resilience programs are acknowledged

A7.1

Confidence in MWPA

RESPONSE TO COMMENTS

I have confidence that implementation of the PWP will succeed viz. because of the high standards of the MWPA team, their collaborative prowess, adherence to the best science, thorough accountability, community orientation, and, or me, most importantly, a commitment to sustaining ecologically sound practices.

Ecologically Sound Practices Partnership (ESP)

As chair of the ESP Partnership, I have worked closely with MWPA leadership in meeting the goal of ESP to mitigate the risk of wildfires, as wisely as possible. In the process we have learned what it takes to reach consensus- mutual trust. We are grateful for these productive working relationships.

As a collaboration between the fire authorities and climate and environmental organizations of Marin, ESP advises Marin's fire professionals, defines best practices to guide the implementation of the wildfire prevention plans, and offers expertise and recommendations on specific projects.

The ESP has three areas of focus: Vegetation Management and Habitat Protection, Defensible Space and Carbon Resource Management, the latter growing out of concern for climate change and biodiversity impacts. We have developed best management practices for reducing carbon emissions and sequestering carbon, and for managing green waste, biomass and other issues related to conserving carbon.

How ESP Can Help

Given the complexity of the PWP, the likely demand for many types of expertise and the experience of ESP, the following might be possible:

- Providing expertise during the implementation of a project
- Consultation on curbing greenhouse gases and sequestering carbon
- Organizing a forum on key coastal zone issues
- Helping to organize a field trip that informs the community and involves ESP specialists.

Please realize that these thoughts about the PWP could be enlarged, modified and analyzed. I have much to learn and simply didn't have time to investigate much of the Plan.

Congratulations on a job well done..

Belle Cole

ESP Partnership, Chair

415-847-8479

RESPONSE TO COMMENTS

ATTACHMENT

REASONS PWP LOOKED UPON FAVORABLY

1. Coastal Marin needs the PWP

Coastal Marin has a long history of frequent low intensity fire, both cultural burning and wildfire. These low intensity frequent fires are catastrophic wildfires. And now, we learn when conditions are right for fire, Coastal Marin is at risk of an ignition becoming a catastrophic wildfire. The 1995 Vision Fire served as an example of the vulnerability of coastal Marin communities.

2. PWP makes sense for the Coastal Zone requiring a single document and framework for comprehensive planning

It will be efficient, without loss of standards, providing an alternative to “project by project review.” The PWP, as a single document, establishes a framework for comprehensive planning, reviewing and permitting that saves money through use of a comprehensive permit vehicle that avoids the need for individual Coastal Development Permits (CDPs).

3. PWP responds to the urgent need for a coordinated, responsible and forward thinking approach.

The framework over the long term assures that individual vegetation PWP management will align wildfire risk reduction planning with the protection of coastal resources. These Coastal Vegetation Treatment Standards (Coastal VTS) were developed to provide additional guidance and clarity for projects to be implemented within the Coastal Zone and within and/or in proximity to Environmentally Sensitive Habitat Areas.

4. Extensive collaboration and coordination taking place at all stages of development and implementation

PWP has been designed in consultation with staff from the California Coastal Commission (CCC), Marin County Community Development

RESPONSE TO COMMENTS

Agency, Marin Wildfire and its member agencies, biologists, forest health experts, fire officials, and major land management agencies including the Department of Parks and Recreation (California State Parks..

5. PWP provides a process for careful selection of future projects

While the PWP program area is quite large, the entire program area would NOT be treated. Future projects would include projects along the edges of communities and areas that would be critical for slowing fire spread on the landscape. Raises question about- what is planned for the non-treated areas and those other areas outside of the PWP jurisdiction (federal lands, State Parks and Recreation).

6. PWP focuses on the range of fire prevention policies for making communities and landscapes wildfire resilient

The road to wildfire resilience is dependent on action on all these fronts: strategic vegetation management, home hardening, defensible space, and public outreach.

7. PWP enables project partners to design and implement multiple critical forest health, ecosystem restoration, and fire prevention projects throughout the PWP Program area

PWP creates, as well, a clear and agreed upon process for approval of individual projects Including a process for monitoring, enforcement, and programmatic review.

8. The range of proposed activities are intended to provide ecological benefit, either directly or indirectly, to the greatest extent feasible

Removing excess understory plants acts as a surrogate for fire that would otherwise occur naturally. These activities help create landscape conditions that more closely resemble those before widespread fire suppression and invasion of non-native species.

9. Common and distinct goals of forest health and fire resilience programs are acknowledged

RESPONSE TO COMMENTS

A healthy forest or ecosystem is one that possesses the ability to sustain naturally the unique species composition and processes that exist within it. This encompasses a system's biodiversity.

Fuel reduction, while often supporting forest or other ecosystem health, is focused on the type, arrangement, and quantity of flammable materials found in the landscape. By modifying any of these attributes, fuel reduction projects seek to alter fire behavior, typically reducing intensity, rate of spread, or flame length, to assist in control of wildfires or prescribed fires.

Response A7.1

The comment is acknowledged in support of the PWP.

RESPONSE TO COMMENTS

Comment Letter A8: ENVIRO-SPORTS Productions, Inc.

To Whom It May Concern:

I support the Public Works Plan (PWP) for vegetation management in Coastal West Marin County.

Because there has been very minimal control burning in our forested area, dangerous levels of vegetation have built up, putting homes, forests, and lives at risk. Fire suppression has disrupted our natural balance, leaving communities in Coastal Marin vulnerable.

While protecting sensitive areas, the PWP allows proactive, coordinated action to reduce wildfire risk and they have been doing a fantastic job. However, this plan focuses only on small, high-priority areas near homes, roads, and community edge, not the entire coastal zone. A8.1

Removing dead, diseased, and invasive plants both reduces wildfire danger and supports native species, improving forest health and water availability. Vegetation management is undeniably where it all begins. The best example of a piece of land out of control is the parcel of NPS (GGNRA) land in the northeast corner at the intersection of Highway One and Panoramic Highway. It is a fire waiting to happen with a beautiful collection of dead and dying trees, non-native plants and non-native trees, choked with impenetrable undergrowth. This parcel sits right on the edge of our beautiful town of Stinson Beach, and it is beside a major evacuation route for many if not all residents of town. One spark and it would go up in an instant. A8.2

Another area of concern is the GGNRA and Mt Tamalpais State Park property above the Panoramic Highway neighborhood where the non-native, invasive, and VERY flammable *Helichrysum Petiolare* has been allowed to grow out of control. We need to hold the stewards of our forests and open space accountable for managing their properties that surround our vulnerable communities. A8.3

Defensible space, home hardening, and education, are so important to help us withstand future wildfires. But forests that surround us also need to be managed by the entities that oversee them. A8.4

I trust the ecological practices of MWPA and Stinson Beach Fire will continue and will include looking at the BIG picture including the areas surrounding the communities of West Marin.

We must balance community safety with environmental care. This plan is a vital step toward protecting our community AND environment.

Sincerely,

Wendy Hunt and David Horning

7000 Panoramic Highway

Stinson Beach, CA 94970

Wendy Hunt Horning
ENVIRO-SPORTS Productions, Inc.
Executive Producer
PO Box 1040
Stinson Beach, CA 94970
wendy@envirosports.com
415-868-1829 office

Response A8.1

The PWP analyzes approximately 44,210 acres where potential future project activities could take place in the Coastal Zone. Future project activities would include targeted treatment in small portions of the program area. Other areas within the Coastal Zone are in the process of being treated, such as through the Coastal Fuel Reduction Network project (available at: <https://www.marinwildfire.org/project/coastal-fuel-reduction-network-project>). Refer to the Marin County website for projects in the West Marin zone for other projects that may occur in the Coastal Zone: <https://www.marinwildfire.org/projects-by-location?tab=westmarin>.

RESPONSE TO COMMENTS

Additional areas on lands within the Coastal Zone owned or managed by the National Park Service (NPS) may be treated under separate project proposals and environmental compliance documents because projects on federal land or with a federal lead agency can continue to comply with the Coastal Zone Act through coordination with the CCC's Federal Consistency Office in San Francisco.

Response A8.2

As discussed in Response A8.1, additional areas on lands within the Coastal Zone owned or managed by other entities such as the NPS may be treated under separate project proposals and environmental compliance documents. Marin Wildfire and its member agencies collaborate with NPS staff to support work on federal lands through other regulatory pathways. Lands owned or managed by the NPS are not included in the PWP program area and therefore this comment is beyond the scope of the analysis.

Response A8.3

Refer to Response A8.2 for a discussion on project activities on NPS lands.

The PWP covers the Marin County's Local Coastal Program jurisdiction area, the Mount Tamalpais State Park, and a small portion of Tomales Bay State Park. As discussed on page 3-7 of the PWP, "California State Parks is a major land manager partner for the PWP but will not fund, implement, or maintain any projects under this PWP. Any projects proposed by Marin Wildfire and member agencies under this PWP that overlap with State Park lands would require coordination with State Parks during planning, implementation, and maintenance."

Response A8.4

The comment in support of the PWP is acknowledged. Marin Wildfire will continue to pursue a multi-pronged approach to wildfire resilience that incorporates large-scale home hardening and defensible space inspections, grants (particularly to support work in Zone Zero), and chipper services, public education, alerts and evacuations, and other programs in addition to targeted vegetation management activities.

As discussed on page 2-4, Marin Wildfire would also engage in "[e]arly consultation and/or coordination among applicable parties including Coastal Commission staff, Marin Wildfire staff, registered foresters or qualified professionals, fire agencies, local landowners and land managers, Firewise committees and local communities, and the Tribe" for approval of individual projects submitted under the PWP.

RESPONSE TO COMMENTS

Comment Letter A9: Fire and Environment Resilience Network

We submit the following recommendations on the Draft PWP. MWPA should be required to greatly increase outreach to Coastal Zone residents and spend at least one dollar on home hardening and work in Zones 0 and 1 for low-income residents for each ten dollars spent on vegetation clearing in other areas. It's important to prioritize and incentivize home hardening in addition to other vegetation management methods, as this has been shown to protect homes and communities.

A9.1

Related to clearing and burn piles, piles of debris prepared for burning will become habitat for many animals. The piles should be broken up and re-piled before burning, to give the animals a chance to escape.¹ If published scientific literature shows that other methods of getting animals to flee the piles work well, we would accept those methods. Hearsay evidence from other practitioners regarding other methods, especially unpublished, cannot be relied upon.

A9.2

We see nothing in HAZ-e (Pile burning) in the Project Design Implementation Features (PDIF) document that says anything about a requirement to chase wildlife from the piles using any method at all. We find this concerning related to the potential significant loss to local biodiversity.

Monitoring of small mammal populations and invasive plant populations must be implemented both before project implementation and for at least three years after treatment. We understand the difficulty of finding sites and control sites elsewhere, but we are confident these sites can be found in the Coastal Zone. We are prepared to help MWPA find these sites. We also understand the expense of monitoring small mammals, but these are critical to the threatened Northern Spotted Owl (NSO) survival, and we believe monitoring is required to fully determine the effect on NSO.

A9.3

Woodrats are a critical part of the diet of NSO, which are common in West Marin. MWPA must agree to count and record all woodrat nests in treated areas and preserve corridors of understory leading from the woodrat nest for at least 20 feet. Bare land outside the 3-foot preservation zone could cause nests to be abandoned. NSO 4 of the PDIF only requires preservation of habitat within 3 feet of the nest but does not require preserving movement corridors to neighboring habitat. We also recommend only very limited and targeted use of herbicides, and only when necessary.

A9.4

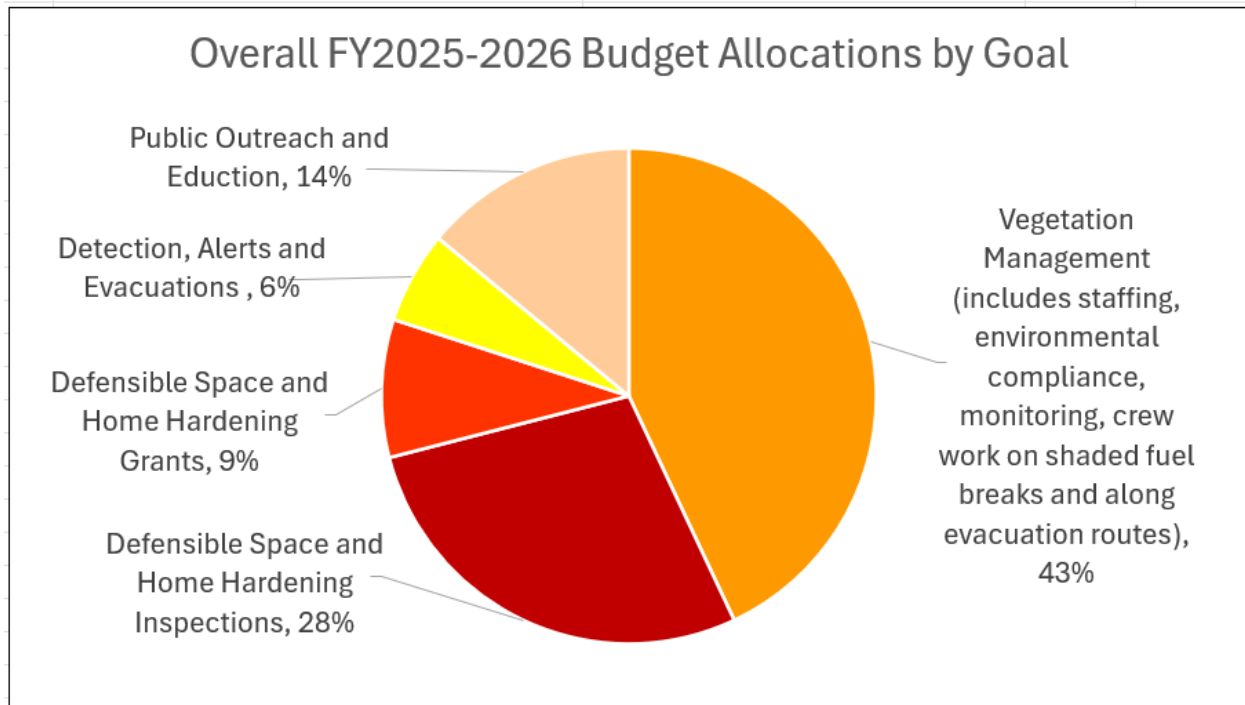
All woodrat nests must be preserved. We oppose the "where feasible" language in NSO 4, which allows woodrat nest destruction.

Response A9.1

Marin Wildfire understands that no single tool will resolve wildfire risk in Marin County and therefore pursues a multi-pronged approach to wildfire resilience that incorporates large-scale home hardening and defensible space projects and programs, grants (particularly to support work in Zone Zero), chipper services, public education, alerts and evacuations, and other programs in addition to targeted vegetation management activities. As is documented on the Marin Wildfire grant matching program webpage (<https://www.marinwildfire.org/project/home-hardening-matching-grant-program>) and resident grant webpage (<https://www.marinwildfire.org/resident-info/resident-grants>), a variety of grants are available to assist with home hardening and defensible space to residents of Marin County. Approximately 37% of Marin Wildfire's fiscal year 2025-2026 budget is allocated to home hardening and defensible space inspections, grants, and other programs and 43% is allocated for vegetation management, including staffing, environmental compliance and

RESPONSE TO COMMENTS

monitoring, as well as vegetation management along evacuation routes and adjacent to communities. Refer to the chart below for the overall budget allocations by goal for fiscal year 2025-2026. This support for home hardening and defensible space is higher than the 10:1 ratio suggested by the commenter. In addition, adjusting the proportion of funding for vegetation treatment projects relative to defensible space work is beyond the scope of this PWP.



Response A9.2

Not all projects proposed under the PWP will include pile burning. For projects proposed under the PWP that do include pile burning, the effects of pile burning will be disclosed in the relevant environmental compliance document. In addition, projects would be required to adhere to SPR BIO-2 which requires biological resource training for workers and states that the “training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician.”

Response A9.3

Monitoring of all small mammal populations and invasive plants species in all potential PWP areas across Marin County is beyond the scope of this PWP and would not be feasible while still addressing the purpose and need of the PWP for efficient implementation to address risk of catastrophic wildfire. Refer to Response A9.4 for a summary of literature related to the effect of vegetation treatments on woodrats. Further analysis of specific effects to woodrats would be disclosed in project-specific environmental compliance documents.

The dusky-footed woodrat is a Species of Least Concern in California, meaning that they are common and widespread within their range. Activities proposed by Marin Wildfire and its

RESPONSE TO COMMENTS

member agencies include thinning understory vegetation; however, native grasses, forbes, and other small understory plants are not the target of removal and continue to provide cover for small animals after understory shrubs are thinned. Additionally, only a small fraction of the program area would be treated in any given year and throughout the lifetime of the PWP meaning there would be a variety of untreated habitat adjacent to project treatment sites at any one time.

For monitoring of invasive plant populations, SPR BIO-9 requires the identification of invasive plants and noxious weeds as well as measures to prevent their spread. This includes the identification of “significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities” (SPR BIO-9, pages B-17 and B-18). Specific treatments related to invasive plants, as well as any monitoring or maintenance activities for invasive plants, would be identified in future project-specific environmental compliance documents.

Response A9.4

The dusky-footed woodrat is common and widespread within their range. Marin Wildfire continuously reviews the scientific evidence regarding how vegetation treatments may affect woodrats and, by extension, northern spotted owls. There have been no documented declines in woodrat abundance in project sites and Marin Wildfire relies on published research to inform expected effects to woodrats. Recent literature has found that removal of downed woody debris can adversely affect woodrat populations (Smyser et al. 2024) while other literature found that mammal abundance was observed to decrease with increased understory vegetative cover; which may be due to the species’ reliance on fungi and pine (Kalies and Chambers 2010). Preliminary research from Stanford University published in 2024 on the impacts of fuel reduction treatments on woodrats indicates that treatments may temporarily disturb some woodrats and result in abandonment of nests (approximately one-fifth of nests present in treatment areas were abandoned) but that the majority of nests abandoned were active again nine months post treatment (Gomez and Hernandez 2024). Because of the varied nature of expected project areas, there are likely to be undisturbed areas available adjacent to treated areas that would provide habitat for woodrats that are disturbed during treatment.

Research consistently finds that woodrats and spotted owls benefit from landscape heterogeneity (i.e., areas with a more even mixture of open, young, and mature forest of differing patch sizes; Kuntze et al. 2025; Kalies and Chambers 2010). Kuntze et al. (2023) specifically found that woodrat abundance was 2.5 times higher in owl home ranges with more heterogeneous mosaics that include young patches versus consistent mature forest. Hamm and Diller (2009) found that woodrat abundance is promoted by growth of understory vegetation but declines as the forest stand matures, which may be due to the change in the understory reducing available food, limiting suitable nest sites, and increasing predator vulnerability. Another study found that dusky-footed woodrats also tend to nest in highest densities in riparian areas (Bravo 2016), which are typically not targeted by the types of vegetation treatments that could disturb woodrats.

RESPONSE TO COMMENTS

Recent research supports the assumption that heterogenous forests promote woodrat abundance as modeling found that woodrats were more likely to occupy sites with a greater quantity of canopy cover, understory cover, hardwoods, and smaller patches of young forest (Kuntze et al. 2025). Although vegetation treatments may reduce some components of woodrat habitat (e.g., understory cover), they would reduce the homogenous nature of vegetation in areas of high density currently common in the Coastal Zone of Marin County and would remove invasive species to allow native plants and shrubs to regrow. This would help facilitate the growth of existing trees, such as hardwoods, and small patches of young forest. Therefore, it is expected that there would be some beneficial effects of the potential future projects to woodrats. Additional specific effects to woodrats would be disclosed in project-specific environmental compliance documents.

Because Marin Wildfire already engages in minimizing possible impacts to woodrats (including preservation of nests where feasible) and because woodrat nests are abundant in and around much of Marin County, requiring the counting and recording all woodrat nests in treated areas, preserving corridors of understory leading from the woodrat nest for at least 20 feet, and preservation of all nests is excluded from further consideration.

Refer to Response A3.8 for a discussion of herbicide use.

RESPONSE TO COMMENTS

Comment Letter A10: Marin Audubon Society

August 29, 2025

Anne Crealock, Planning and Program Manager
Marin Wildfire Prevention Authority (MWPA)
1600 Los Gatos Drive, Suite 345
San Rafael, CA 94903
marinwildfire-pwp@panoramaenv.com

RE: Comments on Marin County Public Health and Fire Resilience Public Works Plan

Dear Ms. Crealock:

The Marin Audubon Society appreciates the opportunity to comment on the Public Health and Fire Resilience Public Works Plan (PWP). A PWP is described by the Coastal Commission as *“land use planning document that sets a framework for implementing a specific public works project or array of public-works related activities.”* We have the same issues with this Plan as we did with the PWP for Tomales Bay State Park. While we support many of the treatment methods, the plan contains insufficient information upon which to base ongoing specific projects. It's lack of clarity and specificity has the potential to lead to inconsistent treatment, and unnecessary habitat loss. A10.1

The PWP document itself discusses the approach, types of projects and treatment activities, as well as standard requirements for projects. The Exhibits contain the more specific information related to Marin County; however, they too are vague, incomplete and contain errors. We have no major problems with many of the treatment activities, but we have the following particular concerns about treatments:

- Ongoing loss of native plant understory. Many species feed on the ground and depend on low growing plants for cover from predators, and for nesting for some species such as hummingbirds. Low growing branches provide important cover and refugia to escape from predators, as well as for foraging. Extensive areas will be treated. One-hundred feet defensible space around houses is an extremely wide area. How much understory habitat will remain in a natural condition, i.e. not be treated, and will it be sufficient to maintain ecosystem integrity? A10.2
- Loss of burn-piles. The focus should be on collecting sticks, branches, and small limbs (see discussion under #7 below) in piles for burning later. These piles become cover and refugia habitat for small creatures including lizards, snakes, small birds, and larger animals hiding from avian and mammalian predators. We have even seen a skunk hiding in one! The PWP should describe the recommended pre-treatment for the piles that will ensure all A10.3

A Chapter of the National Audubon Society

RESPONSE TO COMMENTS

animals hiding in them will escape burning. Whether it is dismantling the pile or using another more effective process, the preferred protocol should be stated in the PWP while allowing for change based on new scientific data.

EXHIBITS

Exhibit A

1. #7 Item b. contains Standards to protect wetlands, ESHAs, and ecosystems. The ESHAs and wetlands should be mapped and presented in this document so the public and decision-makers can understand the overall picture. Further, this discussion appears to allow the removal of wetland vegetation and other sensitive habitats if to “maintain ecological goals would result in an unacceptable fire risk.” Who would be making this decision? It should not be made by practitioners working on-the-ground. Carefully-crafted criteria should be developed to guide such decisions. A further concern is that there are no standards in this list that include protecting wildlife species.

A10.4

2. #7 Item c. (page A4) sets forth a Vegetation Removal Hierarchy. Number 2 is the removal of invasive vegetation, which is critical to maintaining healthy ecosystems as well as reducing fire risk. It should be Priority #1, instead of #2. Number 1 is currently the removal of dead trees and logs; however, they serve an important function in the woodland ecosystem. Many species depend on snags for nesting in holes and broken tops and feeding on the insects that are attracted to the decaying wood. Insects assisting with their decomposition and the decomposing wood enhances the fertility of the soil. While the discussion of snags recognizes that dead trees have ecological value, the recommendation for retention of snags does not reflect that value. The number allowed to remain should be substantially higher. MWPA’s approach has recognized that large logs are not particularly flammable and allows them to remain in place. Why is this approach not reflected in the PWP?

A10.5

On the other hand, the current Number 2, the removal of invasive vegetation, is essential to restoring and maintaining ecosystem health and reducing fire risk, as most invasive plants that occur in the treatment area are highly flammable. The focus should be on collecting sticks, branches and small limbs as the more flammable.

Exhibit C,

1. C9 There are errors in this Exhibit:

- a. Northern Spotted Owl (NSO) Habitat Requirements should note that in Marin County NSO habitat includes oak woodlands, not just old growth redwoods. Potential for Occurrence is listed as LOW. The project area contains large expanses of woodland habitat that appear to be suitable habitat for NSO. As noted In Marin County they inhabit not only old growth forests. The PWP should discuss any surveys that have been done in the project area. We find it hard to believe that there are no NSOs in the area. If no surveys have been done, PWP should ensure the areas are surveyed for nesting owls in advance of treatment. Nests and Activity Centers should be avoided.
- b. California Clapper Rail and California Ridgway Rail – These are the same species. The name was changed from Clapper Rail to Ridgway Rail in 2014. Interestingly, the

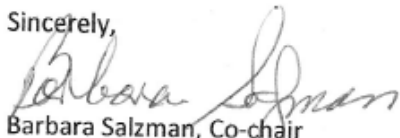
A10.6

RESPONSE TO COMMENTS

- Potential for Occurrence discussion is different for the two species names, with one having LOW and the OTHER Moderate potential. Ridgway Rail (formerly Clapper Rail) is a San Francisco Estuary dependent species. Any occurrence on the coast would be highly unusual. A10.7
2. There are no standards to ensure the protection of any wildlife species.
- a. For protecting NSOs, a fully-protected species, protective actions should include: no treatment within NSO Activity Centers which are a quarter mile around each nest. Surveys will be an important function is assuring NSO nests, and nests for any species, are protected. Allowing surveys to be conducted three weeks before initiating treatment is too long. Nests can be established within that period of time. A10.8
- b. Woodrats are an essential part of the diet of NSO. MWPA should record all woodrat nests in treatment areas. In addition to preserving three feet of natural habitat around nests, movement corridors of grasses and other understory vegetation extending from the woodrat nest to the closest untreated area should be preserved. Removing vegetation so that woodrats must enter an unvegetated zone leaves them particularly vulnerable to predation and could result in nest abandonment. A10.9
- c. Other special status species of concern include Black Rail, Salt-Marsh Common Yellowthroat, Osprey, and Northern Harrier. Standards should be included to protect these species as well. Other bird species are unlikely to occur in the treatment area. A10.10
3. Monitoring should not just include recording whether the treatment is carried out in a satisfactory manner. Monitoring should collect data on the impact on the ecosystem and wildlife species. Monitoring should be conducted just prior to treatment to determine current conditions, as well as after treatment so that the impacts of the treatment can be evaluated. Data should be collected on all of the wildlife species present, particularly special status species, small mammal populations, and invasive plant populations. Monitoring should occur for five years after treatment, and could be every other year. A10.11
- We note that non-West Marin residents and organizations are also interested in the PWP and participating in public hearings. To encourage broad participation, we request that future in-person meetings should provide for participating electronically, not just in-person. A10.12

Thank you for considering our comments.

Sincerely,



Barbara Salzman, Co-chair
Conservation Committee



Mary Jane Schramm, Co-chair
Conservation Committee

RESPONSE TO COMMENTS

Response A10.1

The PWP provides a framework for implementing a specific public works project or array of public works-related activities. This allows for increased consistency, reduced environmental effects, and more efficient implementation by providing boundaries on: a) the types of projects to be covered; b) the range of proposed activities; c) the measures that would be included to reduce effects of future projects; and d) and the approval process for future projects under the PWP. Future project-specific environmental compliance documents (e.g. Project-Specific Analysis, Initial Study/Mitigated Negative Declaration, etc.) will provide additional details on treatment methods, treatment locations, and the expected environmental effects.

Response A10.2

As discussed in other responses, the specific effects of projects to understory habitat will be disclosed in future environmental compliance documents. In general, projects proposed by Marin Wildfire focus on the following:

- removal of much of the accumulated dead and down woody material (while leaving some for wildlife habitat such as "snags" that do not pose a hazard to nearby homes);
- removal of non-native, invasive, fire hazardous vegetation (particularly French broom and other broom species as well as gorse);
- pruning the lower branches of trees; and
- thinning of fire hazardous native vegetation (such as small diameter, tightly packed trees or diseased trees) where necessary.

Note that the entirety of the understory is generally not removed and that treatments promote an appropriate mosaic of native vegetation types that support diverse native floral, faunal, and fungal assemblages.

Pages 3-2 through 3-5 of the PWP summarize a variety of literature on the effects of vegetation treatments on understory biodiversity. This includes that understory species diversity and richness can increase following prescribed burn and vegetation thinning treatments (Dodson et al. 2008; Odland et al. 2021) and that fuel reduction treatments that open the forest canopy to provide increased light to the understory can increase understory production and diversity similar to the effects of low- to moderate-intensity fires (Bartuszevige and Kennedy 2009).

Marin Wildfire also notes that "untreated" areas do not represent the conditions that have historically occurred in California. Forest structure in California over the past 50 to 100 years has generally shifted to be denser, with less large trees and more small trees (McIntyre et al. 2015). At the same time, landscapes have become more homogenous: forested areas in northern California and Marin County specifically have expanded while herbaceous plant communities and shrublands have reduced in size, which reduces the pattern of mosaiced vegetation that occurred previously (Startin 2022; Fertel et al. 2023). This altered landscape has also altered public perception around what a "healthy" or "normal" landscape looks like, including quantity and distribution of understory vegetation. In addition, according to the California Department of Fish and Wildlife, "[t]he removal of natural fire from an ecosystem can lead to

RESPONSE TO COMMENTS

excess fuel buildup and changes in vegetation composition, which can increase the risk of uncharacteristically large high-severity fires" (California Department of Fish and Wildlife 2025).

CalVTP SPRs would be included in all projects to reduce effects to nature resources, such as SPR BIO-5 which requires projects to have treatment activities designed to avoid type conversion where native coastal sage scrub and chaparral are present.

Response A10.3

Refer to Response A9.2 for a discussion of burn piles and measures that apply to reduce the risk of wildlife species that may use burn piles as habitat.

Response A10.4

Delineation and mapping of wetland and Environmentally Sensitive Habitat Area (ESHA) will occur during the environmental compliance process for future site-specific proposed projects. The delineation and mapping ESHA across the approximately 44,210-acre PWP Program Area is not necessary because no specific project treatments are proposed on the ground as part of the PWP. Future environmental compliance documents will define what treatments are proposed to occur as required to identify effects to these resources. In addition, defining these areas generally requires reconnaissance surveys, which would be incorporated as part of future project-specific analyses.

Note that CalVTP SPRs (Exhibit B) as well as Coastal VTS (Exhibit A) apply concurrently and contain a variety of measures to reduce effects to wetlands and ESHAs. As required by Coastal VTS 7.b, proposed projects would "limit treatment activities within wetland boundaries to those that would restore ecological benefits to the wetlands or would maintain wetland habitat quality while improving surrounding ecosystem." Marin Wildfire acknowledges that as stated in Coastal VTS 7.c, "[f]or Fire prevention projects, additional vegetation removal may be allowed if maintaining such vegetation consistent with project ecological goals would result in an unacceptable fire risk to existing structures and infrastructure, and the removal is the minimum necessary to protect existing structures and infrastructure." However, it is expected that this would only occur near to existing structures (such as within 100 feet of houses or infrastructure) and that any such additional removal shall be clearly explained and identified in the PSA or equivalent document.

Measures to specifically address wildlife species and habitat are included in SPRs BIO-10 through BIO-12.

Response A10.5

The Coastal VTS represent a significant collaboration between Coastal Commission staff and technical advisors and Marin Wildfire over the past many months to develop a set of agreed upon vegetation treatment standards. These standards reflect up-to-date science and policy regarding vegetation treatments, wildfire risk, and habitat retention. Modifying these standards is beyond the scope of this analysis. Marin Wildfire notes that while the two items are prioritized distinctly in the Coastal VTS, they are often the same objective during treatment (i.e., thinning and removal of dead and dying invasive plant species).

RESPONSE TO COMMENTS

As noted by the commenter, the Coastal VTS requires some snags to be retained for wildlife shelter. In addition, while all snag retention is not required, Marin Wildfire-funded core projects, including future PWP projects, typically retains some snags in project areas for habitat for wildlife provided that the snags retained do not present a hazard to nearby structures (generally homes) or evacuation routes. Any specifications regarding snag specification would be provided in the future environmental compliance document.

Response A10.6

The row for northern spotted owl in Table D-2 has been modified to state that northern spotted owl “[p]refers old growth and coastal redwood forests with large snags, open space beneath the canopy, and heavy woody debris accumulation on the forest floor but also uses oak woodlands with similar characteristics.”

Response A10.7

The row for California clapper rail in Table D-2 has been removed and the row for California ridgway rail has been updated to state “Low potential. Last documented CNDDDB observation in 1994. Suitable habitat exists in the program area.”

Response A10.8

The projects proposed under the PWP would be required to comply with the Coastal VTS and CalVTP SPRs and Mitigation Measures that include measures to avoid impacts to wildlife species. SPRs BIO-1 and BIO-2 require a data review and reconnaissance level survey prior to treatment as well as a biological resource training for workers to identify work practices necessary to implement biological SPRs, respectively. SPR BIO-10 requires surveys for special-status wildlife and nursery sites, which could include northern spotted owl, if SPR BIO-1 determines suitable habitat for special status wildlife. SPR BIO-8 requires projects to prevent loss or type conversion of habitat and vegetation types that define ESHA, or loss of special-status species that inhabit ESHA. In addition, SPR BIO-12 requires the protection of common nesting birds, including raptors, including pre-treatment surveys, establishment of appropriate buffers around nest sites, and modification or deferral of treatments to avoid disturbance of active nests. Modifying the time period for biological surveys required by the CalVTP is beyond the scope of the PWP.

Response A10.9

Refer to Response A9.4 for a discussion of woodrats and woodrat monitoring.

RESPONSE TO COMMENTS

Response A10.10

As discussed in A10.8, the projects proposed under the PWP would be required to adhere to Coastal VTS and CalVTP SPRs and Mitigation Measures. Future project-specific environmental compliance documents will identify special status species of concern that could occur in the specific project site proposed and would identify anticipated environmental effects to these species.

Response A10.11

Refer to Response A5.3, Response A9.3, and A10.8 for a discussion of monitoring and survey requirements. Note that SPR BIO-9 includes the identification of “significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities” (SPR BIO-9, pages B-17 and B-18). SPR BIO-1 also requires a data review and reconnaissance level survey prior to treatment. SPR BIO-10 requires surveys for special-status wildlife and nursery sites, which could include northern spotted owl, if SPR BIO-1 determines suitable habitat for special status wildlife. These surveys would document the existing conditions (i.e., presence/absence) of various species of concern.

Response A10.12

The PWP was available to review and comment on for a 6-week period as required by Cal. Code Regs. Tit. 14, § 13515. Materials that were discussed and/or presented on during the public meeting were available and remain available for the public to review on the project website located here: <https://www.marinwildfire.org/project/draft-marin-county-forest-health-and-fire-resilience-public-works-plan>. The availability of these materials as well as the public comment period in general provide the opportunity for all members of the interested public, including non-West Marin residents and organizations, to participate in the PWP process.

RESPONSE TO COMMENTS

Comment Letter A11: Tree Spirit Project

August 29, 2025

To: MWPA Executive Board of Directors, MarinWildfire PWP

Re: Comments on Draft Marin County Forest Health and Fire Resilience
Public Works Plan (PWP)

We are writing to express our serious and numerous concerns about the PWP draft's plan to fast-track ten more years of reliance on Cal Fire's California Vegetation Treatment Program (CalVTP). This is flawed for two interrelated reasons:

1) First, the CalVTP approach intentionally bypasses the purpose of stringent CEQA (California Environmental Quality Act) regulations which require detailed and site-specific environmental reviews. This intentional 'end-run' around these state-implemented environmental safeguards is even alluded to in MWPA communications, but euphemistically described as increasing "efficiency" of the approval process. But the CEQA laws were designed and are implemented not to be "efficient" or speed approvals of projects like this one, but, to the contrary, to protect the environment and all animals, both human and non-human, who are dependent upon healthy ecosystems for survival.

A11.1

A coastal grassland near Dillon Beach is not the same habitat, or weather, or hydrology or wildfire prone as a stand of cypress trees in Point Reyes Station, or stand of eucalyptus trees in Bolinas. I understand the *desire* to speed the approval process for replacing multiple site-specific ecological assessments (e.g., EIRs) on a project of this scope and scale — but entirely object to this one-habitat-fits-all *implementation*. To put it simply and bluntly, the CalVTP that this project relies on is, on its face, deeply flawed; in effect, an attempt to bypass CEQA laws which protect Marin County and California state citizens.

2) The current sciences of biology, ecology and fire, contradict most of the underlying assertions of this project, including that "vegetation management" — including the use of chainsaws, masticating machines, out-of-season controlled burns and extensive herbicide applications — beyond 100 ft. from houses and structures — are woefully outdated as wildfire protection treatments.

A11.2

Even current fire science and field data from county, state and federal agencies and institutions including Cal Fire, Fire Safe Marin, the NFPA, UC Irvine, UCLA, Cal Poly, and the U.S. Forest Service, all profess that the most effective wildfire protections are

RESPONSE TO COMMENTS

making houses and structure “ignition-resistant” with hardening treatments and preparation; defensible space treatments not more than 100 feet from structures and mostly within 30 feet, plus community preparedness like coordinating evacuation routes.

Massive, multi-thousand-acre “vegetation management” projects, including this one, are in reality just a euphemism for forest-reduction or deforestation. Meaning they literally reduce the amount of trees and plants; shrubs and other productive understory vegetation. This project barely even acknowledges that most of these plants targeting for death-by-mastication, are even alive. This reveals an astonishing lack of ecological and scientific awareness, and calls into serious question the scientific knowledge of the project’s advising biologists and ecologists.

A11.3

If all plants, both living and dead, are only taken into account from a firefighter’s extremely limited perspective, as “fuel,” how could this project be, as advertised, a “forest health initiative.”

Today’s forest biologists and ecologists know that there is no such thing as an “overgrown” forest. There is no waste in a wild forest; nothing to clean up, or “thin” or “remove” or “treat.” Every one of the proposed project treatments mentioned – chainsaws, masticators, chippers, herbicides and artificially forcing fire onto a landscape – are biologically and ecologically destructive.

Worse, these treatments in most cases leave a forest of other wildland habitat sunnier, hotter, drier, and windier. All of which mean the wild areas subjected to these “treatments” are rendered more, not less, flammable and dangerous to the surrounding human communities. Killing — also called “removing” — literally thousands of plants and trees means fewer plants to trap, condense fog, produce shade, all which cools the immediate environment and *reduce* the likelihood of wildfire ignition.

A11.4

Which means the very same industrial “treatments” sold to the public as methods that will reduce wildfire danger do exactly the opposite – they *increase* wildfire danger.

Yet even this is not a full accounting of the damage this project will do. Massive amounts of carbon will be released by all these plant-killing, deforestation “treatments.” More than if some of these areas beyond 100 feet from houses were to burn in a wildfire!

A11.5

And compounding the problems, millions of dollars spent on destroying vegetation will be diverted from expenditures which would make people safer, and their homes less likely to ignite in any nearby wildfire. Namely, the aforementioned, proven, effective

A11.6

RESPONSE TO COMMENTS

treatments of creating defensible space and home hardening.

The foundational assumption of this plan warrants independent, third-party assessment, as opposed to consultants with a financial interest in its implementation as is. The Cal Fire 2024–2025 case studies cited on the “PWP Draft” notice page are unacceptably generalized and vague, incomplete, and fail to reflect major legal and scientific developments from the last 5-10 years.

Our human communities, wild animal populations, and our vulnerable life support systems — the surrounding undeveloped lands which are staring down the barrel of this plan’s destructive assault — all merit more thought, more care, *more thorough, precise and detailed and site-specific* impact analysis, long before the first masticating machines fire up.

The scientific evidence is overwhelming and damning of this PWP’s assumption, assertions and thus its prescriptions: **up to 90% of homes lost in wildfires ignite from wind-blown embers.**

A11.6

*“To slow fire spread, neighborhoods must function as fuel breaks rather than fuel sources. **Primarily, they must resist ember attacks as wildfire approaches.** Then the structures and the space between must also serve to break the chain of fire spread through flame contact and radiant heat. Unfortunately, **the lessons of past conflagrations in urban settings have not been applied to our residential neighborhoods in materials and design.**”* (The Return of Conflagration in Our Built Environment Giammanco et al., 2023)

The PWP must be revised to reflect the latest, data-driven conclusions — not ineffective and counter-productive vegetation management strategies. Marin County should and must lead with a smarter, less destructive, more thoughtful approach, one with expenditures that actually reduce wildfire danger: home and structure hardening, defensible space within 100 feet from houses and structures, and community preparedness.

This PWP plan will waste precious community funds on destructive, ineffective, even counterproductive vegetation treatments outside the 100’ defensible space zone, which should instead be spent on programs and treatments — to houses, not forests and other wildland habitats — that actually protect homes, ecosystems, and the lives of countless thousands of human and non-human animals.

Community Protection: From the House-Out, Not the Forest-In

RESPONSE TO COMMENTS

*"All such projects and reforms must recognize an important truth: **The current wildfire management approach has inverted the wildfire problem. Wildland fires do not, per se, encroach on communities. Rather, it's communities that have impinged on wildlands, where fires play an important ecological role.** Predominant strategies continue to apply limited, risk-averse reactions that emphasize community protection at the expense of both resilient landscapes and safe, effective wildfire responses. Forward-looking ecological and practical thinking would help **move communities away from continually degrading fire-adapted ecosystems and underinvesting in community resilience.** Instead, this change in thinking will move toward a sustainable approach that consistently promotes ecological and human ecosystem benefits."* (December 2023, PNS, [Wildland-urban fire disasters aren't actually a wildfire problem](#))

A11.6

Tragically, this PWP does the opposite of the above prescription for effective wildfire resilience; it instead uses the ineffectual playbook of the past, focusing on **widespread vegetation destruction in wildlands, which does not stop wind-driven wildfires**, but only degrades ecosystems, and diverts funds from the proven solutions, which even the agencies driving this plan acknowledge to be effective.

Reducing Fuels - Two Different Strategies

The PWP conflates two very different goals: reducing fuels to protect communities and promoting long-term forest and ecosystem health. In reality, these goals often require very different strategies, and when they are lumped together under the same plan, it can lead to unintended consequences—namely, habitat degradation, soil disruption, and ineffective wildfire protection.

[\(When Active Management of high conservation value forests may erode biodiversity and damage ecosystems"](#), 2025, David Lindenmayer, *Philip Zylstra, Chad T. Hanson, Diana Six, Dominick A. DellaSala):

A11.7

To paraphrase the above citation:

The PWP confuses and attempts to conflate two entirely different goals:

1) killing plants and trees — referred to only from a firefighter's perspective as "fuels" which means it ignores biological realities and impacts — in the hopes of protecting communities, and;

RESPONSE TO COMMENTS

2) promoting long-term forest and ecosystem health.

The result is a massive betrayal of the public trust by failing at both goals; meaning the result will be habitat degradation, soil disturbance, degradation and compaction; surface and ground water contamination, net greenhouse gas emissions, an increase in local temperature, a reduction in local humidity — and an increase in the likelihood of wildfire ignition.

- **Soil health loss:** Pile burns of prescribed fires exceeding 600°C, kill mycorrhizal fungi, microbial life, and seedbanks for years. **Mechanical thinning, mastication, and bulldozing of compact soil**, disrupt hydrology, and **destroy the mycorrhizal networks and fungal hyphae** that regulate water and nutrient flows and support tree and understory regeneration (Beyers et al., [USDA 2018](#)).
- **Wildlife impact:** Brush piles provide critical nesting, shelter, and foraging habitat for birds, reptiles, and small mammals—yet many are incinerated without adequate wildlife protection, even after so-called “careful” inspections by biologists or hand crews. In reality, these checks often miss hidden nests and den sites, resulting in the silent destruction of countless non-target species.
- **Carbon loss:** The Draft Plan echoes Cal Fire’s claim that removing vegetation through thinning and prescribed burning preserves carbon by preventing wildfires. However, this assertion is based on a **critical and well-documented miscalculation**. According to Cal Fire’s own **Fire and Resource Assessment Program (FRAP)**, the **annual probability of wildfire in most forested regions of California is just 0.5% to 1.5%**, even in high fire severity zones projected through 2050. This means that in over **98% of forested areas**, the fuel wouldn’t have burned at all in any given year—so the carbon stored in those trees and shrubs would have remained intact.
- Even more troubling, research published in *Ecological Applications* and by forest carbon modelers such as [Buchholz et al. \(2021\)](#) reveals that **any short-term carbon benefits from preventing fire can be quickly erased** by what’s called “carbon reversal risk”—when fire still occurs, or when the treatment itself releases more carbon than it prevents. This flaw has been exposed in **California’s forest carbon offset market**, where credit assumptions have collapsed under scrutiny due to **inflated risk models and real-world reversals** (CarbonPlan, 2022; Minnesota Forest Resources Council, 2021).

A11.8

A11.9

RESPONSE TO COMMENTS

By removing vegetation that is unlikely to burn—then counting it as a carbon savings—is not only scientifically flawed, it's fiscally irresponsible. These claims do not account for carbon losses from cutting and soil disturbance, nor do they factor in the high probability that treated areas will not burn at all within the next several decades. Instead of spending millions to degrade carbon-rich ecosystems under the guise of “wildfire protection,” Marin County should prioritize structure hardening, near-home defensible space, support landscape stewardship, which deliver both climate and community resilience benefits that are measurable, durable, and grounded in real risk.

A11.9

[Beverly Law's 3/9/22 The Status of Science on Forest Carbon Management to Mitigate Climate Change and Protect Water and Biodiversity](#)

- **Type conversion:** In fire-adapted ecosystems like chaparral, mechanical thinning and repeated disturbance break natural regeneration cycles and open space for invasive grasses and weedy shrubs. This shift—known as type conversion—replaces complex, carbon-rich native plant communities with highly flammable, fast-burning vegetation, increasing fire frequency and intensity while eroding biodiversity, soil health, and watershed stability. Once this conversion occurs, it is often irreversible.

A11.10

Wild Ecosystems are Wildfire-Resilient; Managed Ecosystems Are Degraded and Flammable

- **Dense, moist, shaded soils, habitats and forests are wetter, lusher, healthier and more biodiverse. “Opened-up,” exposed, sunnier forests cut to become more unnaturally “park-like” are less healthy, drier, less complex** — denuded of the very foundation of resilient, self-sustaining

A11.11

RESPONSE TO COMMENTS

- ecosystems that support native species, pollinators, and long-term ecological health.
- **Natural fire cycles**, not artificial “open” forest and wildlands which are the result of “thinning” and vegetation “clearance” — more euphemisms for deforestation designed to fool the public — disrupt ecological balance, fragment wildlife corridors, and increase vulnerability to invasive species and erosion which they falsely purport to protect.
 - **Carbon storage** is increased by maintaining living trees, shrubs, and undisturbed soils. Cutting, pile burning, and disturbing soils with machinery and workers releases stored carbon and undermines long term climate goals.

A11.11

Instead of reducing risk, these treatments create new vulnerabilities — including erosion, invasive species, and habitat fragmentation. By relying on CalVTP’s fuel-first approach, the PWP will turn carbon-rich, biodiverse landscapes into degraded ecosystems with increased likelihood of wildfire ignition and rapid combustion, both of which puts human communities and wild animal populations at greater risk.

Herbicide Use is Both Harmful and Unnecessary

The PWP is extremely, and one must assume intentionally, vague in its language on the use of herbicides. Exhibit A, “h”, pg A-5 states; **Limit Herbicide Use.**

“Herbicides shall be avoided to the maximum extent feasible and may be used only if such treatment activities are the least environmentally damaging feasible alternative, while still achieving project objectives, and will not result in significant adverse impacts to sensitive ecological resources (e.g., when used to control invasive species). Dab or paint methods of herbicide application shall be preferentially used over wand or other targeted spray methods of application, where feasible.

A11.12

According to CalVTP guidelines—and confirmed by public warning signs — highly toxic herbicides like glyphosate, and triclopyr are actively being used in vegetation management projects, including this one, *unless stated otherwise in writing.*

These are toxic, systemic chemicals, designed to be absorbed into the entire plant, all the way to the roots. And they don’t stop there. **An estimated 20% of these poisons seeps into the surrounding soil, where they destroy vital microbial life** that plants, trees, and entire ecosystems depend on. **These herbicides don’t just kill weeds and invasives—they damage, degrade and kill the living systems these plans are**

RESPONSE TO COMMENTS

supposed to protect.

The damage and the danger goes far beyond the target weeds and invasive plants. Scientific studies show that herbicides pose serious health risks to humans and wildlife — even at extremely low doses. Glyphosate, for example, is a known endocrine disruptor and was added to California's Prop 65 list of carcinogens in 2017. Unlike traditional toxins, endocrine disruptors don't follow the rule that **"the dose makes the poison"**—they can be harmful even in minuscule concentrations. Herbicides also contaminate waterways, bioaccumulate in the food chain, and harm pollinators and other non-target species through drift, runoff, and erosion.

The environmental and health risks of herbicide use include:

- **Acute and chronic toxicity**—eye, skin, respiratory, and gastrointestinal harm.
- **Damage to non-target species**—via drift, overspray, and runoff into aquatic ecosystems.

Endocrine disruption and bioaccumulation—including effects from so-called "inert" ingredients, which are often unregulated but highly toxic.

Given the proven success of herbicide-free vegetation management by MMWD — which stewards 22,000 acres, including fire-prone forests on Mt. Tamalpais — **there is no justification for MWPA to continue using toxic chemicals.**

The PWP must reject CalVTP's outdated herbicide allowances and instead commit to ecologically sound, non-toxic practices that prioritize public and environmental health. **MMWD's approach shows that effective, fire-resilient land management without herbicides is not only possible—it's already happening.** MWPA should follow their lead and explicitly prohibit herbicide use, abandoning the permissive frameworks of CalVTP and Integrated Pest Management.

A11.12

Legal and Scientific Incompatibility

In 2025, [The Chaparral Institute v. Board of Forestry ruling](#) (2024) declared CalVTP inadequate under CEQA because it failed to **analyze ecological impacts of vegetation conversion** and lacked **evidence of efficacy** in reducing fire risk.

- **No demonstrable evidence of effectiveness** in reducing wildfire risk or protecting communities
- **Neglect of cumulative and site-specific ecological impacts**, including harm to

A11.13

RESPONSE TO COMMENTS

native habitats and biodiversity

- **Systematic misuse of CEQA exemptions**, allowing large-scale vegetation clearance to bypass environmental review and permits

A11.13

The current PWP, as written, repeats many of these vulnerabilities. Marin residents deserve that MWPA seriously considers these findings and rethink its reckless PWP 10-year fast track of fuel reduction treatments which demands an update.

A Better Path Forward

We urge MWPA and the Executive Board to:

1. **Update the PWP by aligning with the latest fire science, accurate carbon accounting, and up-to-date post wildfire data and empirical studies**—not outdated treatments that no longer reflect on-the-ground realities.
2. **Prioritize more funds and more [financial support for structure hardening](#) and Zone Zero defensible space** especially in high priority fire prone areas.
3. **Reduce the reliance on CalVTP- guided fuel reduction practices, which have been repeatedly shown to offer negligible protection during high-intensity, wind-driven wildfire events**, while causing significant ecological degradation and carbon loss.
4. **Separate forest health from wildfire suppression objectives**, and reject one-size-fits-all approaches that ignore ecological variability and site-specific fire behavior.
5. **Adopt MMWD’s herbicide-free standard** to protect public and environmental health.

Marin’s PWP must be updated to reflect the latest fire science and on-the-ground outcomes — not outdated strategies which fail to take into account today’s escalating wildfire risks — and improved, proven preventative treatments, from house-out, not the forest-in.

The evidence is clear: targeted, more effective approaches that focus on houses, not on vegetation beyond 100 feet from houses and structures are what effectively protect human communities, wild animal populations, and the wildland habitats we all rely on.

We’ve documented the impacts of MWPA vegetation/fuel reduction projects

RESPONSE TO COMMENTS

firsthand, attended wildfire forums at the state and local level, and reviewed the latest post-fire data and research. It's time to align these programs with the latest biological, ecological and wildlife science.

We're eager to provide additional data and resources to support this change — because public safety, ecological health, and responsible use of taxpayer dollars depend on a strategy that actually works, which is not evident in this current MWPA PWP.

Respectfully,

Jack Gescheidt, San Rafael
Fleur Dawes, San Anselmo
Lisa Levinson, Topanga

Additional References:

1. UC Irvine – Field Experiments on Ember Behavior

Researchers at UC Irvine conducted detailed field studies in the Sierra Nevada to analyze how embers (firebrands) travel and ignite structures. They confirmed that **embers can carry long distances into landscaping and buildings**—and that **home hardening features like ember-resistant vents and noncombustible materials directly mitigate this risk** [CalMatters](#)+2[Inside Climate News](#)+2[San Francisco Chronicle](#)+2[NIST](#)+1[The Guardian](#)+1.

2. UCLA – Post-2025 Los Angeles Fires Analysis

UCLA's report following the January 2025 Los Angeles wildfires made clear that **large-scale shrubland fires are generally unstoppable during high winds**, and that landscape-scale fuel reduction had little effect on limiting overall damage. Importantly, the study emphasized three proven protection strategies:

1. **Home hardening**—resistant building materials (e.g. shingles, vents, siding),
2. **Zone Zero defensible space**—near-home vegetation management, and
3. **Community preparedness** [arXiv](#)[The Guardian](#)+2[ResearchGate](#)+2[AP News](#)+2.

3. Infrastructure & Ember Risk Studies

Multiple investigations—by UCI, USFS, NIST, IBHS, and FEMA—have consistently shown that **embers are the primary ignition source for structures in wind-driven wildfires**, not surface fuels. They highlight that **ember-resistant vents, non-flammable landscaping within 5–20 ft**, and improved building codes dramatically reduce structure loss [engineering.uci.edu](#)+2[US Forest Service](#)+2[ibhs.org](#)+2.

4. US Forest Service & USGS Research – Wind vs. Fuel Fires

RESPONSE TO COMMENTS

Jon Keeley (USGS) and Alex Syphard (USFS) categorize modern California wildfires into two types. Most of the **most destructive fires are “wind-driven,” not fuel-driven**—meaning that **thinning and fuel removal in wildlands offer little protection when Santa Ana or Diablo winds are igniting homes miles away** [ResearchGate+2USGS+2SpringerOpen+2](#).

5. Camp Fire Analyses & Defensible Space Findings

Studies like Mockrin et al. (USFS) and Syphard et al. (Cal Poly) consistently show that **homes with 5–20 ft defensible space and high-quality materials** survive at much higher rates than those with fuel treatments farther away. Defensible space beyond 100 ft is shown to add little additional protection, even on steep slopes [ibhs.org+3US Forest Service+3ResearchGate+3](#).

6. Photos after the Los Angeles fires in January 2025 show many yards where vegetation didn’t burn while neighboring houses did. AP Photo/Chris Pizzello
California’s plan to ban most plants within 5 feet of homes for wildfire safety overlooks some important truths about flammability. [UC Santa Barbara, UC San Diego, 2025 study](#).

Response A11.1

Analysis of the compliance of the CalVTP with the California Environmental Quality Act is beyond the scope of this PWP. Refer to Response A3.9 for a discussion of the current status of the CalVTP PEIR.

As disclosed in the PWP, the PWP “provides a planning framework to review and authorize individual vegetation management projects in Marin County over the next 10 years or until dissolution of Marin Wildfire, whichever occurs sooner, using principles, strategies, and best management practices that align wildfire risk reduction planning with the protection of coastal resources” (page 1-2). The PWP does not authorize implementation as suggested by the commenter. It “creates a clear and agreed upon process for approval of individual projects submitted under the PWP” and therefore future environmental compliance documents will analyze and authorize specific projects across the PWP Program Area as required by CEQA. The PWP itself does not authorize any projects. Refer to Chapter 6 of the PWP for a summary of this approval process.

Response A11.2

Refer to Response A3.2 for a discussion of the effectiveness of vegetation treatments in reducing wildfire risk and severity.

RESPONSE TO COMMENTS

Response A11.3

As disclosed on page 3-5 of the PWP, future projects would “primarily [focus] on removal of invasive and non-native, fire hazardous vegetation, removal of dead and dying vegetation, and limbing up of native trees to mimic conditions that might have existed if wildfires were allowed to occur.” Future project specific environmental compliance documents will disclose specific project locations and the specific treatments and vegetation removal that would occur.

Marin Wildfire notes that vegetation treatments can benefit native forest species through the removal of invasive species like broom to help prevent the establishment of an invasive plant fire cycle, which can create a self-perpetuating decline of native species (Brooks et al. 2004; Chambers et al. 2019). Additional activities would likely also address the buildup of unnatural densities of vegetation that has occurred after exclusion of wildfire and cultural burning on the landscape. In these cases, vegetation management acts as a fire surrogate to bring landscapes closer to what they would have been before colonization and fire suppression policies. California Department of Fish and Wildlife states that “[t]he removal of natural fire from an ecosystem can lead to excess fuel buildup and changes in vegetation composition, which can increase the risk of uncharacteristically large high-severity fires” (California Department of Fish and Wildlife 2025).

Treatments would promote an appropriate mosaic of native vegetation types that support diverse native floral, faunal, and fungal assemblages. Refer to Response A10.2 for a discussion of the departure of current vegetation conditions for historical conditions.

Response A11.4

Refer to Response A3.2 for a discussion of how vegetation treatments influence wildfire risk and severity.

Lesmeister et al. (2019) indicates that thinning in wet, dense forests may increase fire behavior; however, the study area occurred in northwestern California and southwestern Oregon where the annual precipitation ranged from 1,500 to 3,000 millimeters (59 to 120 inches) and elevation range from approximately 1,800 to 5,500 feet above mean sea level. In contrast, most of Marin County (as part of the San Francisco Bay hydrologic region) receives an average of 20 to 25 inches of rain per year and elevation ranges from 0 to approximately 2,500 feet above mean sea level at Mount Tamalpais. This represents a different and much drier and lower ecosystem type (California Department of Forestry and Fire Protection (CAL FIRE) 2019, page 3.11-8).

Lesmeister et al (2019) concludes that in the driest forest types, fire exclusion converts open forests with grassy understories to dense forests with high fuel loads, and the increased fuel continuity can result in larger patches of high-severity fire than would have occurred historically. Other research indicates that this process is occurring in Marin County and therefore the PWP Program Area, as shrub and forestland has decreased as forests have expanded and herbaceous plant communities and shrublands have decreased (Startin 2022; Fertel et al. 2023). As a result of this transition, fuel loading and associated fire risk has increased across the PWP Program Area.

RESPONSE TO COMMENTS

The treatments that would be proposed would primarily involve thinning of understory vegetation and small or hazard trees in a predominantly young forest (where treatments occur in woodland or forest communities) thereby retaining canopy cover, which would reduce wildfire risk without changing the character of the forest stands (i.e., from closed to open). This is supported by research referenced in the Lesmeister et al. (2019), which showed that on Forest Service-managed lands that included thinning smaller trees (less than 20 inches), prescribed fire, and otherwise no active management, these practices resulted in forests with more resilience to high-severity wildfire as opposed to management on private lands, which had a management objective to produce revenue through commercial timber production (Charnley et al. 2017).

Response A11.5

Refer to Response A3.5 for information regarding greenhouse gas emissions and carbon sequestration.

Response A11.6

Refer to Response A3.1 and Response A9.1 for a discussion of the multi-pronged approach that Marin Wildfire takes to wildfire resilience. As discussed in those responses, Marin Wildfire supports home hardening and defensible space initiatives throughout Marin County. Refer to Response A3.2 and Response A11.4 for relevant literature that Marin Wildfire has reviewed as part of the PWP process that document the effectiveness of vegetation treatments at reducing wildfire risk and severity. Future project-specific environmental compliance documents will review and consider additional applicable and up-to-date literature to support the conclusions drawn in those documents.

Refer to the Marin Wildfire website for additional information on organization governance, budget, and processes: <https://www.marinwildfire.org/>.

Response A11.7

Refer to Response A2.1 and Response A3.3 for a discussion of the overlap of the goals of forest health projects and fuels reduction projects.

Response A11.8

Refer to Response A3.4 for a discussion of the disclosure of project-specific effects to soil health and wildlife.

Response A11.9

Refer to Response A3.5 for information regarding greenhouse gas emissions and carbon sequestration.

Response A11.10

Refer to Response A3.6 for a discussion of the disclosure of project-specific risk of type conversion.

RESPONSE TO COMMENTS

Response A11.11

As discussed in Responses A3.6 and A3.4, specific environmental effects of projects considered through the PWP, such as the likelihood of type conversion from a proposed project, will be disclosed in future environmental compliance documents. Changes to erosion rates, invasive species, and habitat fragmentation would also be disclosed in these documents and would be reduced through the use of measures described in Exhibits A, B, and C of the PWP.

Response A11.12

Refer to Response A3.8 for a discussion of herbicide use.

Response A11.13

Refer to Response A3.9 for a discussion of the CalVTP PEIR legal challenge.

1.4.2 Comment Group B – Individuals

Comment Letter B1 – Robert Raven

Do not cut down healthy trees and bushes! They are fire resistant, and absorb CO2.
Healthy trees and bushes are habitat and food sources for many species.
Even dead trees are crucial habitat and food sources.
Let Nature be as natural as possible!
Protect only buildings.

B1.1

Response B1.1

The comment in opposition to cutting trees and bushes is acknowledged. Please see Response A3.2 for information on how vegetation treatments reduce wildfire risk. For work beyond 100 feet of structures, proposed treatment areas would generally be wider than 100 feet on a slope where burning vegetation preheats upslope vegetation and creates more intense, faster moving wildfires, therefore necessitating a wider treatment area. Additionally, Marin Wildfire is working with experts to model locations where fire would move the fastest across the landscape due to vegetation, topography and wind. These are called fire pathways and may be recommended for future projects. Coastal Commission staff may recommend project locations to improve forest health while also reducing wildfire risk. Therefore, flexibility in terms of project width is needed when developing an overall project area in which future projects would take place. Recent research supports Marin Wildfire's efforts and has shown that fuel treatments across landscapes (including beyond 100 feet of structures) reduce the negative outcomes of wildfires such as a structure loss and, importantly, enhance suppression opportunities (Jain et al. 2021). Alcasena et al. (2022) specifically found that a combined landscape and home ignition zone treatment scenario resulted in the highest reduction in structure loss.

RESPONSE TO COMMENTS

Comment Letter B2 – Karin Lease

I am writing to request that the hearing scheduled for Aug. 5th be postponed or rescheduled. It isn't listed on the MWPA website and it's also too early for a hearing as the draft plan was just released. This does not allow enough time for the public to read, consider and respond to the proposal, which is an important part of the democratic process. I know it's hard lately to remember that we strive to uphold democratic principles, but it is absolutely essential, especially now! And we are talking about the commons, so giving the public proper notification and meaningful ways to respond is the ethical thing to do. B2.1

I'd like to remind you all that the Mount Vision Fire was started by an illegal campfire, not a build-up of fuel loads. Though this fire was large, it had ecological benefits. So this notion that preventing fire will heal the environment is completely false. Look where fire suppression has gotten us thus far. So now, why does it make sense to do MORE fire suppression? B2.2

This broad ranging PWP "framework" is inadequate for the various microclimates and ecosystems in the proposed treatment area; each should be assessed separately. B2.3

The firescale vegetation map is inadequate, and doesn't represent the actual forest conditions (it's not all eucalyptus). It doesn't provide enough detail to envision the actual condition of these forests. B2.4

The data provided on the MWPA website is outdated and doesn't outline any of the significant risks associated with this project. At least I couldn't find that. B2.5

I suggest we use the vast amounts of money slated for more fire suppression for a home hardening program for all residents, not in a misguided attempt to prevent wildfire that will lead to hotter, more frequent fires, making Marin County hotter, drier and less safe. B2.6

One of the most treasured aspects of Marin County are it's beautiful, world renowned forests. We can protect them by leaving them alone. They don't need "managing". I really think nature is smarter than we are and we should be guided by that intelligence, B2.7

not by fear of nature. We have a lot to lose and this misguided management idea puts us all at risk of losing everything we value.

Response B2.1

The meeting on August 5, 2025 was not a hearing. It was a public meeting on the draft PWP which is required as part of the PWP process. The public review period was 6 weeks as is required by the PWP process from July 18 to August 29, 2025. The first decision on the PWP will occur at the Marin Wildfire Board of Director's meeting on September 18. All meetings regarding the PWP have been made public as noted in Section 1.2 and have been made public on the Marin Wildfire project website and their calendar.

RESPONSE TO COMMENTS

Response B2.2

Chapter 2 of the PWP does not discuss the cause of the Mount Vision fire because it is beyond the scope of the PWP. The PWP in Section 2.1 acknowledges that much of the native vegetation species and communities of coastal Marin County have adapted to tolerate or, in some cases, require fire to propagate. The PWP does not address fire suppression efforts or treatments. The PWP is meant to provide a single document that establishes a framework for comprehensive planning, reviewing, and permitting of activities that would otherwise trigger the need for individual Coastal Development Permits. Section 3.5 of the PWP provides a description of the range of activities that could be proposed under the PWP.

Response B2.3

Chapter 6 of the PWP describes the procedures for reviewing and authorizing each individual project, once proposed, to confirm whether it is as consistent with the Marin Wildfire's Forest Health and Fire Resilience PWP for vegetation treatment in the Coastal Zone that is carried out pursuant to the Board of Forestry's Final PEIR for the CalVTP or a different environmental compliance process. Specific environmental effects of projects considered through the PWP will be disclosed in future environmental compliance documents. This includes additional review of the specific habitat where the vegetation treatment would occur, including potential reconnaissance survey to support the environmental review.

Response B2.4

Please refer to Response B2.3.

Response B2.5

Please refer to Response A3.2 regarding the scientific literature supporting the PWP.

Response B2.6

Please refer to Comment A9.1 for information regarding funding for home hardening.

Response B2.7

The comment's opposition to managing forests is acknowledged.

Comment Letter B3 – Lonna Richmond

By far the most effective wildfire risk reduction “treatments” (so-called home “hardening”) are to houses and structures, not to forests and wildlands. | B3.1

Killing plants and trees beyond 100 ft. from houses and structures is pointless; does not accomplish anything but killing more desirable plants and trees. | B3.2

You want to live in a desert, they already exist. stop killing our beautiful forests. we need them now more than ever | B3.3

Response B3.1

The commenter's support for home hardening is acknowledged. Please refer to Response A9.1 for information regarding funding for home hardening.

RESPONSE TO COMMENTS

Response B3.2

Please see Response A3.2 for information on how vegetation treatments reduce wildfire risk and Response B1.1 regarding vegetation treatments beyond 100 feet of structures.

Response B3.3

The commenter's opposition to killing forests is acknowledged. The PWP would not kill forests. Please see Section 3.5 of PWP for the range of proposed activities.

Comment Letter B4 – Andy Bunnell

I am deeply concerned about the proposed “ Forest Health and Fire Resilience Plan”.

Firstly why are we just finding out about it now and why rush the process?

B4.1

Perhaps you already know that when enough citizens of Marin, and other counties, become aware of this draft proposal there will be concerted opposition for how you plan to kill trees and other interconnected life! This is an outrage! The meeting on Tuesday is not even listed on the MWPA website!! Really?

Mt Vision was started by an illegal campfire, not fuel build up!!

B4.2

The sweeping PWP “framework” does nothing to account for the very diverse microclimates of coastal Marin. Each ecosystem deserves and needs specific attention.

B4.3

The MWPA website has outdated and biased research.

B4.4

Please show real, sincere leadership and slow down this process down so that there is time to work on it as a engaged community!

B4.5

Response B4.1

Please see Section 1.2 for information regarding public outreach. All meetings regarding the PWP were published on the Marin Wildfire website both on the project-specific page as well as on the calendar.

Response B4.2

The start of the Mount Vision fire is beyond the scope of the PWP.

Response B4.3

Chapter 6 of the PWP describes the procedures for reviewing and authorizing each individual project, once proposed, to confirm whether it is as consistent with the Marin Wildfire's Forest Health and Fire Resilience PWP for vegetation treatment in the Coastal Zone that is carried out pursuant to the Board of Forestry's Final PEIR for the CalVTP or a different environmental compliance process. Specific environmental effects of projects considered through the PWP will be disclosed in future environmental compliance documents. This includes additional review of the specific habitat where the vegetation treatment would occur, including potential reconnaissance survey to support the environmental review.

Response B4.4

Please refer to Response A3.2 regarding the scientific literature supporting the PWP.

RESPONSE TO COMMENTS

Response B4.5

Please see Section 1.2 for information regarding public outreach. The PWP was drafted in consultation with staff from the CCC, Marin Wildfire and its member agencies, and major land management agencies including (California State Parks over a period of several years. The public outreach process is dictated by the PWP process and in addition, each project proposed under the PWP will have additional public outreach as required.

Comment Letter B5 – Kris Cedar

It is a huge mistake, and shortsighted to assault our beautiful and healthy State Parks and forests with chainsaws, chippers, masticating machines, and HERBICIDES.

There are better ways to mitigate risk of wildfires without killing forests flora and fauna.

Home hardening to start with. Please be respectful to the environment. We have few protected wild places. The more wild places we harm, the more we harm ourselves.

Thank you,

B5.1

Response B5.1

The commenter's opposition to use of mechanical equipment and herbicides is acknowledged. Please refer to Response A9.1 for information regarding funding for home hardening.

Comment Letter B6 – Susan Dent

I find this will endanger wildlife, obviously dry out the forests and make the areas more susceptible to fire.

B6.1

Please cancel this plan and stop using deforestation as an excuse to waste tax dollars. Instead encourage and fund people to protect their own homes by insisting on hardscaping their areas.

B6.2

Fires have been caused by arson and I want to know why officials of the California counties and State are not serious about ARSON.

10-15% of fires in California in the past were from arson.

85% of woodland fires are caused by human action (according to the National Park Service.

When hundreds of acres of forests and property are destroyed the maximum sentence seems to be only 9 years imprisonment. This is intentional destruction of habitat and the trees needed to absorb carbon. It increases the killing of our planet. Arson should be a capital crime. Not a slap on the wrist.

B6.3

Response B6.1

Please refer to Response A3.2 and Response A11.4 regarding vegetation treatment and forest temperature.

Response B6.2

The comment in opposition to the PWP is acknowledged. Please refer to Response A9.1 for information regarding funding for home hardening.

Response B6.3

This comment is beyond the scope of the PWP.

RESPONSE TO COMMENTS

Comment Letter B7 – Cheryl Higgins

I am very appreciative of the PWP which will provide the structure for future vegetation management projects in the Coastal zone.

I am very impressed with the science used by Cal-Fire and MWPA. We are incredibly fortunate to have Mark Brown as director of MWPA. He has the perfect credentials to head up fire prevention efforts. I have the utmost respect for him and confidence in the vegetation management projects going forward. I live on Sunshine Court in Inverness Park and have watched a pilot project on Sunnyside Drive, which is beautifully done. If future projects are so carefully and expertly done, we will be in much better shape at wildfire mitigation on West Marin. Please continue to work the the (federal) Park on joint projects.

B7.1

Response B7.1

The comment is acknowledged in support of the PWP.

Comment Letter B8 – Steve Merlo

I attended the Aug. 5 meeting at Pt. Reyes Station for the public comment period for the Marin Wildfire JPA. I listened to many comments from the public that were very emotional but lacking in scientific facts. So I am going to speak for Fire. I have been around since before you two legged creatures walked on this ground. Your predecessors embraced me and respected me and learned to use me to our mutual advantage. I am the predator of the vegetative community. I harvest the sick and weak and recycle the nutrients they contain. The first people used my services to keep the plant community healthy and open for the game they harvested to sustain themselves. Over time, in your haughty ignorance, you decided you know better than me and decided I was no longer your ally. You quashed me for generations and now blame me for the devastation you brought on yourselves. Since you choose to eliminate me from the ecological web, you have no choice but to replace my function with an alternative. Mechanical vegetation removal is your best alternative. Pile burning of the residual and chipping seems an acceptable disposal method. Broadcast burning near your homes seems dangerous. Even your best broadcast burning advocates have had several mishaps and years of no burn advocacy at this time seems to take broadcast burning off the table. I have tried to be your friend but now you must go it alone. I am still here to help if you need me. Fire

B8.1

Response B8.1

The comment is acknowledged. The support for mechanical vegetation removal is acknowledged.

RESPONSE TO COMMENTS

Comment Letter B9 - Jinesse Reynolds, *et al*

We are writing to express serious concern about the PWP draft's plan to fast-track ten more years of reliance on Cal Fire's California Vegetation Treatment Program (CalVTP). This approach is increasingly out of step with current fire science and field data from institutions like UC Irvine, UCLA, Cal Poly, and the U.S. Forest Service, which show that the most effective wildfire protections are structure hardening, Zone Zero defensible space, and community preparedness. Large-scale vegetation treatments including thinning, understory removal, and remote fuel breaks have repeatedly failed to stop wind-driven wildfires—and often worsen the problem by degrading ecosystems, releasing carbon, and diverting funds from proven strategies.

We respect MWPA's mission and leadership, especially its focus on Zone Zero and supporting transparency. But the foundation of this plan warrants closer scrutiny. The Cal Fire 2024–2025 case studies cited on the "PWP Draft" notice page are vague, possibly incomplete, and fail to reflect major legal and scientific developments from the last five years. **Before proceeding, we owe it to both our communities and our ecosystems to pause, reassess, and course-correct.**

B9.1

The evidence is clear: up to 90% of homes lost in wildfires ignite from wind-blown embers. ***"To slow fire spread, neighborhoods must function as fuel breaks rather than fuel sources. Primarily, they must resist ember attacks as wildfire approaches. Then the structures and the space between must also serve to break the chain of fire spreadthrough flame contact and radiant heat. Unfortunately, the lessons of past conflagrations in urban settings have not been applied to our residential neighborhoods in materials and design."*** ([The Return of Conflagration in Our Built Environment](#) Giammanco et al., 2023)

The PWP must be revised to reflect the latest, data-driven insights—not vegetation management strategies that are no longer effective. Marin has a responsibility to lead with a smarter, more targeted approach—one that directs resources toward what actually reduces risk: structure hardening, defensible space, and community preparedness. It's time to stop wasting funds on the ineffective vegetation treatments outside the 100' defensible space zone and invest in the solutions that truly protect lives, homes, and ecosystems.

Community Protection - A New Perspective is Needed

"All such projects and reforms must recognize an important truth: The current wildfire management approach has inverted the wildfire problem. Wildland fires do not, per se,

encroach on communities. Rather, it's communities that have impinged on wildlands, where fires play an important ecological role. Predominant strategies continue to apply limited, risk-averse reactions that emphasize community protection at the expense of both resilient landscapes and safe, effective wildfire responses. Forward-looking ecological and practical thinking would help move communities away from continually degrading fire-adapted ecosystems and underinvesting in community resilience. Instead, this change in thinking will move toward a sustainable approach that consistently promotes ecological and human ecosystem benefits." (December 2023, PNS, [Wildland-urban fire disasters aren't actually a wildfire problem](#))

B9.2

Yet, the PWP still prioritizes wide-scale vegetation removal in wildlands, a strategy that has shown little benefit in wind-driven wildfires while degrading ecosystems and diverting funds from high-impact solutions.

RESPONSE TO COMMENTS

Reducing Fuels - Two Different Strategies

The PWP conflates two very different goals: reducing fuels to protect communities and promoting long-term forest and ecosystem health. **In reality, these goals often require very different strategies, and when they are lumped together under the same plan, it can lead to unintended consequences—namely, habitat degradation, soil disruption, and ineffective wildfire protection.** ([When Active Management of high conservation value forests may erode biodiversity and damage ecosystems](#)”, 2025, David Lindenmayer, *Philip Zylstra, Chad T. Hanson, Diana Six, Dominick A. DellaSala):

B9.3

- **Soil health loss:** Pile burns of prescribed fires exceeding 600°C, kill mycorrhizal fungi, microbial life, and seedbanks for years. **Mechanical thinning, mastication, and bulldozing of compact soil, disrupt hydrology, and destroy the mycorrhizal networks and fungal hyphae that regulate water and nutrient flows and support tree and understory regeneration** (Beyers et al., [USDA 2018](#)).
- **Wildlife impact:** Brush piles provide critical nesting, shelter, and foraging habitat for birds, reptiles, and small mammals—yet many are incinerated without adequate wildlife protection, even after so-called “careful” inspections by biologists or hand crews. In reality, these checks often miss hidden nests and den sites, resulting in the silent destruction of countless non-target species.
- **Carbon loss:** The Draft Plan echoes Cal Fire’s claim that removing vegetation through thinning and prescribed burning preserves carbon by preventing wildfires. However, this assertion is based on a **critical and well-documented miscalculation**. According to Cal Fire’s own **Fire and Resource Assessment Program (FRAP)**, the **annual probability of wildfire in most forested regions of California is just 0.5% to 1.5%**, even in high fire severity zones projected through 2050. This means that in over **98% of forested areas**, the fuel wouldn’t have burned at all in any given year—so the carbon stored in those trees and shrubs would have remained intact.

B9.4

B9.5

B9.6

- Even more troubling, research published in *Ecological Applications* and by forest carbon modelers such as [Buchholz et al. \(2021\)](#) reveals that **any short-term carbon benefits from preventing fire can be quickly erased** by what’s called “carbon reversal risk”—when fire still occurs, or when the treatment itself releases more carbon than it prevents. This flaw has been exposed in **California’s forest carbon offset market**, where credit assumptions have collapsed under scrutiny due to **inflated risk models and real-world reversals** (CarbonPlan, 2022; Minnesota Forest Resources Council, 2021).

B9.6

By removing vegetation that is unlikely to burn—then counting it as a carbon savings—is not only scientifically flawed, it’s fiscally irresponsible. These claims do not account for carbon losses from cutting and soil disturbance, nor do they factor in the high probability that treated areas will not burn at all within the next several decades. Instead of spending millions to degrade carbon-rich ecosystems under the guise of “wildfire protection,” Marin County should prioritize **structure hardening, near-home defensible space, support landscape stewardship**, which deliver both climate and community resilience benefits that are **measurable, durable, and grounded in real risk**. [Beverly Law’s 3/9/22 The Status of Science on Forest Carbon Management to Mitigate Climate Change and Protect Water and Biodiversity](#)

RESPONSE TO COMMENTS

- **Type conversion:** In fire-adapted ecosystems like chaparral, mechanical thinning and repeated disturbance break natural regeneration cycles and open space for invasive grasses and weedy shrubs. This shift—known as type conversion—replaces complex, carbon-rich native plant communities with highly flammable, fast-burning vegetation, increasing fire frequency and intensity while eroding biodiversity, soil health, and watershed stability. Once this conversion occurs, it is often irreversible.

B9.7

“Resilient Environments - Requires Healthy Ecosystems

- **High biodiversity, healthy soils, and layered habitat complexity**—the foundation of resilient, self-sustaining ecosystems that support native species, pollinators, and long-term ecological health.
- **Natural fire cycles**, not artificial openness created by thinning and vegetation clearance—which disrupt ecological balance, fragment wildlife corridors, and increase vulnerability to invasive species and erosion.
- **Carbon storage**, maintaining living trees, shrubs, and undisturbed soils—not accelerating carbon loss through cutting, pile burning, and soil disturbance that release stored carbon and undermine long term climate goals.

B9.8

Instead of reducing risk, these treatments often create new vulnerabilities—including erosion, invasive species, and habitat fragmentation. By relying on CalVTP’s fuel-first approach, the PWP risks turning carbon-rich, biodiverse landscapes into degraded ecosystems with reduced fire resilience and climate benefits.

Herbicide Use is Unnecessary and Harmful

The PWP is extremely vague in its language on the use of herbicides. Exhibit A, “h”, pg A-5 states; **Limit Herbicide Use.** *“Herbicides shall be avoided to the maximum extent feasible and may be used only if such treatment activities are the least environmentally damaging feasible alternative, while still achieving project objectives, and will not result in significant adverse impacts to sensitive ecological resources (e.g., when used to control invasive species). Dab or paint methods of herbicide application shall be preferentially used over wand or other targeted spray methods of application, where feasible.*

According to CalVTP guidelines—and confirmed by MWPA public warning signs—highly toxic herbicides like glyphosate, and triclopyr are actively being used in vegetation management. These are systemic chemicals, designed to be absorbed into the entire plant, all the way to the roots. But they don’t stop there. An estimated 20% seeps into the surrounding soil, where they destroy vital microbial life that plants, trees, and entire ecosystems depend on. **These herbicides don’t just kill weeds and invasives—they unravel the living systems these plans are supposed to protect.**

RESPONSE TO COMMENTS

The danger goes far beyond the target weeds and invasive plants. Scientific studies show that herbicides pose **serious health risks** to humans and wildlife—even at extremely low doses. Glyphosate, for example, is a known endocrine disruptor and was added to California's Prop 65 list of carcinogens in 2017. Unlike traditional toxins, endocrine disruptors don't follow the rule that **"the dose makes the poison"**—they can be harmful even in minuscule concentrations. Herbicides also contaminate waterways, bioaccumulate in the food chain, and harm pollinators and other non-target species through drift, runoff, and erosion.

B9.9

The environmental and health risks of herbicide use include:

- **Acute and chronic toxicity**—eye, skin, respiratory, and gastrointestinal harm.
- **Damage to non-target species**—via drift, overspray, and runoff into aquatic ecosystems.
- **Endocrine disruption and bioaccumulation**—including effects from so-called "inert" ingredients, which are often unregulated but highly toxic.

Given the proven success of herbicide-free vegetation management by MMWD—who steward 22,000 acres, including fire-prone forests on Mt. Tamalpais—there is no justification for MWPA to continue using toxic chemicals. The PWP must reject CalVTP's outdated herbicide allowances and instead commit to ecologically sound, non-toxic practices that prioritize public and environmental health. MMWD's approach shows that effective, fire-resilient land management without herbicides is not only possible—it's already happening. MWPA should follow their lead and explicitly prohibit herbicide use, abandoning the permissive frameworks of CalVTP and Integrated Pest Management.

Legal and Scientific Incompatibility

In 2025, [The Chaparral Institute v. Board of Forestry ruling](#) (2024) declared CalVTP inadequate under CEQA because it failed to **analyze ecological impacts of vegetation conversion** and lacked **evidence of efficacy** in reducing fire risk.

- **No demonstrable evidence of effectiveness** in reducing wildfire risk or protecting communities
- **Neglect of cumulative and site-specific ecological impacts**, including harm to native habitats and biodiversity
- **Systematic misuse of CEQA exemptions**, allowing large-scale vegetation clearance to bypass environmental review and permits

B9.10

The current PWP, as written, risks repeating many of these vulnerabilities. Marin residents deserve that MWPA seriously considers these findings to rethink the reckless PWP 10 year fast track of fuel reduction treatments that need updating.

Response B9.1

This letter is the same as the letter provided by Watershed Alliance of Marin. Please refer to Response A3.1.

Response B9.2

Please refer to Response A3.2.

RESPONSE TO COMMENTS

Response B9.3

Please refer to Response A3.3.

Response B9.4

Please refer to Response A3.4.

Response B9.5

Please refer to Response A3.4.

Response B9.6

Please refer to Response A3.5.

Response B9.7

Please refer to Response A3.6.

Response B9.8

Please refer to Response A3.7.

Response B9.9

Please refer to Response A3.8.

Response B9.10

Please refer to Response A3.9.

Comment Letter B10 – Carolyn Hintz

I oppose the large-scale vegetation management element of your draft plan for coastal wildfire resilience. Cutting down trees and shrubs over 100 ft. from houses does nothing to protect homes. It will make forests hotter and drier, and will, tragically, increase wildfire danger. B10.1

Response B10.1

The comment opposing vegetation management is acknowledged. Please see Response A3.2 for information on how vegetation treatments reduce wildfire risk and Response B1.1 regarding vegetation treatments beyond 100 feet of structures. Please refer to Response A3.2 and Response A11.4 regarding vegetation treatment and forest temperature.

RESPONSE TO COMMENTS

Comment Letter B11 – Chris Anthony

A key strength of the Draft PWP is its innovative, streamlined permitting framework. Rather than requiring separate Coastal Development Permits for each individual fuel reduction project, the PWP provides a single comprehensive plan developed in coordination with the California Coastal Commission to cover multiple projects over the next decade. This programmatic approach will expedite the implementation of urgently needed forest health and fuel management work while maintaining strong environmental protections for coastal resources.

B11.1

The PWP reflects current scientific understanding of forest health and fire behavior, ensuring that projects carried out under its framework will both reduce fire hazards and promote ecological resilience. By working closely with environmental and fire science experts, the plan has struck an appropriate balance between urgent wildfire safety needs and the stewardship of habitat, water, and wildlife.

I also want to emphasize the ecosystem benefits of the vegetation management activities facilitated by the PWP. In my experience, well-planned fuel reduction treatments (removing dead/down woody debris, invasive brush like broom and gorse, and other ladder fuels) greatly mitigate wildfire intensity and improve firefighter safety. Just as importantly, these treatments can help restore healthier forests. Thinning out aggressive invasive plants and overly dense undergrowth allows mature native trees to thrive with less competition for water and nutrients, trees become more vigorous, sequester more carbon, and are more resilient to drought and disease. Removing excess brush and small trees effectively acts as a surrogate for the historic low-intensity fires that used to cycle nutrients and maintain open forest structure. As a result, the forest can regain a more natural balance, with improved biodiversity and reduced risk of pest outbreaks, while also being far less susceptible to extreme wildfire. The PWP will facilitate these kinds of strategic, ecologically minded fuel reduction projects, helping to create landscapes that resemble the fire-adapted conditions that existed prior to a century of fire suppression.

B11.1

In conclusion, I fully support the Marin County Forest Health and Fire Resilience PWP as a critical and timely initiative.

Thank you very much for your consideration of my comments. Please feel free to contact me if you have any questions. I look forward to seeing the PWP approved and put into action for the benefit of Marin County's residents and ecosystems.

Response B11.1

The comment is acknowledged in support of the PWP.

RESPONSE TO COMMENTS

Comment Letter B12 – Cheryl Cormia

I attended the meeting and was startled to hear the people speaking who opposed the PWP as presented. We live on one acre in Inverness and it is a lot of work to try to keep our home safe from wildfire. The hotter a fire is by the time it reaches our neighborhood, the less chance we have to save our homes, despite the work we have done to clear around it.

B12.1

My partner and I know that we need the help of your organization to help clear the underbrush from the forested areas surrounding our neighborhoods. We heartily SUPPORT the Public Works Plan to help clear the accumulation of underbrush and dead trees/branches in order to reduce the severity of wildfires when they occur. Thank you for your help!

Response B12.1

The comment is acknowledged in support of the PWP.

Comment Letter B13 – Ginny and Will Felch

Without regular low-intensity fire, dangerous levels of vegetation have built up, putting homes, forests, and lives at risk. Our region has a long tradition of cultural burning and natural wildfire that once supported healthy, resilient ecosystems. Fire suppression has disrupted this balance, leaving communities vulnerable, as the 1995 Vision Fire made clear.

The PWP allows proactive, coordinated action to reduce wildfire risk while protecting sensitive resources. Developed with fire agencies, biologists, ecologists, State Parks, and the Coastal Commission, the plan focuses only on small, high-priority areas near homes, roads, and community edge, not the entire coastal zone.

B13.1

Removing dead, diseased, and invasive plants both reduces wildfire danger and supports native species, improving forest health and water availability. Vegetation management, combined with defensible space, home hardening, and education, gives us the best chance to withstand future wildfires.

Stinson Beach and environs are a GO TO destination and have always provided and supported a widespread population of visitors from around the world. Our community is dedicated to do everything we can to embrace the safety and survival of this precious area, our home.

I trust the ecological practices of MWPA and Stinson Beach Fire, whose work has consistently balanced community safety with environmental care. This plan is a vital step toward protecting our community and environment.

Response B13.1

The comment is acknowledged in support of the PWP.

Comment Letter B14 – Yarow Schley

Without regular low-intensity fire, dangerous levels of vegetation have built up, putting homes, forests, and lives at risk. Our region has a long tradition of cultural burning and natural wildfire that once supported healthy, resilient ecosystems. Fire suppression has disrupted this balance, leaving communities vulnerable, as the 1995 Vision Fire made clear.

The PWP allows proactive, coordinated action to reduce wildfire risk while protecting sensitive resources. Developed with fire agencies, biologists, ecologists, State Parks, and the Coastal Commission, the plan focuses only on small, high-priority areas near homes, roads, and community edge, not the entire coastal zone.

B14.1

Removing dead, diseased, and invasive plants both reduces wildfire danger and supports native species, improving forest health and water availability. Vegetation management, combined with defensible space, home hardening, and education, gives us the best chance to withstand future wildfires.

I trust the ecological practices of MWPA and Stinson Beach Fire, whose work has consistently balanced community safety with environmental care. This plan is a vital step toward protecting our community and environment.

Response B14.1

The comment is acknowledged in support of the PWP.

RESPONSE TO COMMENTS

Comment Letter B15 – Suzanne Gooch

Please focus your efforts on ~~Zero~~
Zone 0 vegetation management and help
make this financially possible for those whose
resources are limited.
Please don't butcher healthy trees &
vegetation by masticating and removal.

B15.1

Response B15.1

Please refer to Response A9.1 for information regarding funding for home hardening. The PWP is meant to provide a single document that establishes a framework for comprehensive planning, reviewing, and permitting of activities that would otherwise trigger the need for individual Coastal Development Permits. Section 3.5 of the PWP provides a description of the range of activities that could be proposed under the PWP. Impacts to vegetation would be addressed at the project-specific level.

Comment Letter B16 – Louna Richmond

Please focus your efforts on Zone 0
vegetation management and help make this
financially possible by providing grants for
those with limited resources.
Please don't remove/butcher healthy trees
and vegetation by masticating and removal
leaving ugliness ~~in~~ where beauty
once was.

B16.1

Response B16.1

Please refer to Response A9.1 for information regarding funding for home hardening. The PWP is meant to provide a single document that establishes a framework for comprehensive planning, reviewing, and permitting of activities that would otherwise trigger the need for individual Coastal Development Permits. Section 3.5 of the PWP provides a description of the range of activities that could be proposed under the PWP. Impacts to vegetation would be addressed at the project-specific level.

RESPONSE TO COMMENTS

Comment Letter B17 – Karin Lease

Intact forests provide essential services and habitat for all of us, not just humans. Opening up forests will only make them hotter, drier and more prone to winds that blow embers into neighborhoods, causing them to burn! | B17.1

If you really want to create positive change in the wildfire prevention world, go after the source of climate heating... Like animal agriculture, burning fossil fuels and development. | B17.2

And create resilient human neighborhoods with home hardening etc. | B17.3

Don't punish the forests, wild animals and other life forms including humans by destroying this vital, interconnected and vastly intelligent system. | B17.4

Response B17.1

Please refer to Response A3.2 and Response A11.4 regarding vegetation treatment and forest temperature.

Response B17.2

Animal agriculture, burning fossil fuels, and development are beyond the scope of the PWP which focuses on vegetation management within the coastal zone as it is a permit process.

Response B17.3

Please refer to Response A9.1 for information regarding funding for home hardening.

Response B17.4

The comment is acknowledged. The PWP is meant to provide a single document that establishes a framework for comprehensive planning, reviewing, and permitting of activities that would otherwise trigger the need for individual Coastal Development Permits. Impacts to wildlife would be addressed at the project-specific level.

RESPONSE TO COMMENTS

Comment Letter B18 – Abby Cunningham

I am writing to oppose the Marin County Forest Health and Fire Resilience Public Works Plan. Rather than approve this sweeping proposal, the Marin Wildfire and Prevention Authority (MWPA) should instead pause and focus on home hardening, safe evacuation routes, and defensible space within 100 feet of all adjacent homes in this project area.

B18.1

I do not believe this project (or “framework”) will achieve its purpose of protecting communities, but could in fact *increase* the likelihood of a wind-driven fire event occurring in the adjacent neighborhoods. The proposal does not focus enough on [human-caused ignition risk](#), (the [main cause](#) of wildfires), but instead gives the MWPA the green light to subjectively log and clear healthy, mature forests. Under this proposal, the MWPA could cut trees and remove understory habitat **outside** of evacuation routes and defensible space corridors close to structures—virtually anywhere it wants in the Marin County Coastal Zone. This includes popular parks such as Muir Woods, Tomales Bay State Park, and Mount Tamalpais State Park.

B18.2

The logging and pesticide provisions in the PWP are not only counter-productive, but could actually increase the likelihood of a wind-driven fire event devastating neighboring homes. The proposal could also subject both neighbors and the general public to noise, disruption, air pollution, and potentially to [toxic dust](#) from the possible future on-site production of biochar, bio oil, and/or bio gas (syngas).

B18.3

This proposal asks the wrong questions about what will protect communities, restore ecosystems, and/or provide ecological benefits, appearing to rely mainly on industry priorities rather than the best available, peer-reviewed science.

For example, the question of whether or not logging might theoretically reduce fire behavior under certain conditions is irrelevant to the questions of what actually causes wildfire (human-caused ignition sources); what will save lives (safe evacuation routes); what does protect homes (home hardening); and *whether or not the proposed treatment has untenable public safety risks that negate its purported benefits*.

B18.4

In assessing alternatives, the MWPA has apparently failed to take a more disciplined approach, which would focus the majority of taxpayer resources on safe evacuation

B18.5

routes, defensible space, and home hardening—three things that must be done *first before a wildfire event*. Logging, clearing and/or substantially altering the structure of mature and old-growth forests (MOG forests) would irreparably harm these fragile ecosystems and damage our coastline for generations.

B18.5

RESPONSE TO COMMENTS

Current Legal Challenges

Given the written neighbor complaints and concerns about other “fuel reduction” projects by the MWPA in Marin County, I think it would be inappropriate for the California Coastal Commission to simply green-light this proposal. It would also be imprudent to proceed on legal grounds.

The California Attorney General is expected to issue guidance to all state agencies to pause vegetation treatments of chaparral ecosystems until the Cal VTP is updated, based on a recent court case, [Cal. Chaparral Institute v. Bd. of Forestry & Fire Protection](#).

B18.6

In that case, a panel of impartial appellate court judges determined that “...*Plaintiffs argue the lack of a findings leave the public with no understanding of how type conversion will actually be evaluated, mitigated, avoided, or monitored. We agree this error is significant given that it could leave decision makers and residents alike unaware that measures they believe are being taken to reduce fire risk are actually increasing the threat that wildfires will ignite and spread.*”

The Marin County Forest Health and Fire Resilience includes the rare Marin Manzanita, a species that is [dependent on wildfire](#). The PWP also includes Bishop Pine forest, and references the PWP for the Tomales Bay State Park Forest Health Project, which is currently being challenged in court and will not be resolved until at least October of 2025.

This One-Size-Fits All PWP Is Inappropriate

The Marin County Forest Health and Fire Resilience PWP does not indicate with enough precision how it will protect or restore Bishop Pine forest at Tomales Bay State Park and elsewhere. Instead the PWP indicates that the project might use “...portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity.” This is unsuitable for public parks, including Tomales Bay State Park. If the PWP relies on the same management assumptions made by [California State Parks](#) (in their PSA and PWP for Tomales Bay State Park), for example, reducing canopy to 10% in places, I am concerned that the Marin County Forest Plan might be out of compliance with CEQA.

B18.7

There are many varying microclimates and wildlife habitats within the proposed treatment area. Any reasonable course of action would include multiple project proposals that address these differences, focusing primarily on evacuation routes and distressed areas. It would also emphasize defensible space within 100 feet of homes in the project area, as well as safe evacuation routes and low-cost loans to home owners to harden their homes. Finally, it would have guardrails in place to re-assess as needed and closely monitor the work of contractors. Instead, the MWPA insists on submitting a proposal that includes mature and old-growth redwood forest and known habitat for many wildlife species, including Northern Spotted Owls.

B18.7

RESPONSE TO COMMENTS

Inaccurate and/or Incomplete Description of Impacts

Page 6 of the Marin County Forest Health and Fire Resilience PWP states that “To date, one other PWP has been developed in coastal Marin. The PWP was certified on May 9, 2024, for the Tomales Bay State Park. The Tomales Bay State Park PWP only includes ecological restoration treatments, mainly to preserve and improve resilience of the Bishop pine forest, whereas this PWP includes ecosystem health and fire prevention project types and treatments focused on enhancing natural habitats around communities.” I think this is misleading, as there are multiple fuel reduction projects happening simultaneously throughout the county, and near this specific treatment area.

B18.8

The Marin County Forest Health and Fire Resilience PWP appears to be inaccurate about the possibility of species such as Northern Spotted Owls in the large treatment area. Page 146 states “Low potential (for presence of Northern Spotted Owls). No CNDDDB documented occurrences. Program location does not overlap designated final critical habitat. Suitable habitat exists in the program area.” Yet there are as many as 88 Northern Spotted Owl (NSO) nesting sites. located in the future [Greater Mill Valley Shaded Fuel Break](#) as well as documented Northern Spotted Owl nesting sites in the treatment area of Tomales Bay State Park, according to the [PSA](#) and the [project website](#) for the Tomales Bay State Park Forest Health and Wildfire Resilience Project.

B18.9

I am very concerned about the expert testimony submitted via email by wildlife biologist Maya Khosla on August 14, 2025, which states that “...The PSA (for the Greater Mill Valley Shaded Fuel Break) makes incorrect inferences about the current science on spotted owls, cites Lesmeister et al 2018 (book chapter) in ways that are misleading and incorrect, and ignores key findings in Lesmeister et al 2019 and 2021, also referenced in Cormier et al 2024.”

B18.10

Limited Public Engagement

Although this proposal was evidently years in the making, it was released to the public in the middle of summer when many families are on vacation. The public hearing for the

B18.11

project was available only in person with no Zoom option, and, on the National Night Out when there was a BBQ and Live Music right down the street in Point Reyes.

B18.11

- The use of before/after photographs presented by the MWPA that residents thought were unrepresentative of actual conditions in the field; B18.12
- The use of toxic pesticides; B18.13
- The deforestation of mature forest lands adjacent to private property where residents have lived for years; B18.14
- The risk of higher wind speeds, and higher fire danger that might result from opening the mature forest canopy; B18.15
- Neighbor complaints about slash, debris, and flammable material left on site at other “restoration” and “fuel reduction” sites managed by the MWPA B18.16
- The possible danger to wildlife and loss of habitat.

RESPONSE TO COMMENTS

Ecological Benefits of Mount Vision Fire Ignored

Most, if not all, of the treatment area is outside the Wildland-Urban interface. The PWP presents the Mount Vision fire as a problem of wildfire. However, The Mount Vision Fire was started by [an illegal campfire](#), not a build-up of fuel. As large as the fire was, however, its ecological benefits are well-documented and wholly ignored in this PWP. Our native trees, plants, and wildlife have co-evolved with local species depend on wildfire, and these have been well documented here and elsewhere:

B18.17

- [Mt Vision Fire, Lessons Learned](#)
- [Post-Fire Vegetation Response in the Bishop Pine Forest at Point Reyes National Seashore](#)

Potential Dangers to Public Not Addressed

As mentioned early, this sweeping PWP appears to ignore the best available science, which indicates that home hardening and defensible space within 100 feet of the home or structure is the [most effective way to protect the community](#) against wildfire danger. The fastest-growing and most destructive fires in the US between 2001 to 2020 [were fast fires](#), according to an article published in *Science*. Furthermore, there are many reputable, peer-reviewed studies suggesting that fuel-reduction logging such as that suggested in the PWP can actually put communities at [greater risk of wildfire danger](#).

B18.18

There are other possible dangers as well. This proposal ignores the potentially significant air pollution that might result from the production of biochar – a valuable industrial product – as well as bio oil, bio gas and biomass energy.

B18.19

The Solid Organic Waste Disposition Plan specifically mentions the possibility of material being “...transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting).” On page 135 the PWP states that “Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity.”

B18.19

I believe this proposal will **not** reduce greenhouse gas emissions in any way, especially if carbon-sequestering trees are logged to produce biomass energy. According to [Bartowitz et al \(2022\)](#) “...harvest of mature trees releases a higher density of carbon emissions (e.g., per unit area) relative to wildfire (150–800%) because harvest causes a higher rate of tree mortality than wildfire.”

B18.20

RESPONSE TO COMMENTS

[A recent position stand by the Sierra Club](#) also states that "...forest biomass is not clean or renewable energy but rather is dirty energy that pollutes communities, exacerbates the climate crisis, and threatens native biodiversity...We note the alarming proliferation of forest biomass energy facilities, and new proposals for facilities of all sizes, and recognize that the cumulative impacts on the climate, communities, and biodiversity from a larger number of smaller facilities can be the same as from a smaller number of larger facilities (e.g., ten 3-megawatt facilities compared to one 30-megawatt facility)."

B18.21

It is interesting to note that an FAQ posted to the Greater Mill Valley Shaded Fuel Break project website as of 8/15/24 stated that "...Marin Wildfire is participating in the Marin Biomass Project to identify long-term, high-value solutions for managing domestic green waste and biomass produced by wildfire hazard reduction activities throughout the County over the *next ten to twenty years* (emphasis added)."

Local Context of Project Area Ignored or Minimized

The Marin County Coastal Zone isn't an island unto itself. The surrounding area is a magnificent ecosystem of continuous habitat, and one of the most biologically rich in the State of California, if not the entire world. Fire is an important part of this ecosystem, and trees do not have to be logged to engage in prescribed fire, cultural burning, or controlled wildland fire—if one should occur.

The California Coastal Commission should be aware that this project is one of many industrial-scale vegetative "thinning" or logging projects happening throughout the county. Two additional new projects have been approved in the past month alone, including the [Greater Mill Valley Shaded Fuel](#) project and the [San Rafael Hill and Deer Valley Fuel Reduction Project](#). All told, there are a stunning number of projects that

B18.22

RESPONSE TO COMMENTS

have already happened or are in the works in the [San Rafael Zone](#), the [Southern Marin Zone](#), the [Central Marin Zone](#), the [Novato Zone](#), and [the West Marin Zone](#).

The proposal is unclear about the number of trees that could be logged, how big, where, or how old. With so many projects happening simultaneously, it's hard to imagine that the proposed mitigation measures in the Marin County Forest Health and Fire Resilience Public Works Plan will be enough to protect Northern Spotted Owls and other wildlife; carbon-sequestering mature and old-growth redwoods; fire-resistant native plants; and pollinating insects on which all life depends.

The attached documentation provides links and resources to the best available science regarding forest health, fire prevention, and protection for important native species like Northern Spotted Owls. Also included is an expert comment letter about the [Tomales Bay State Park Forest Health Project](#), which was provided to the California Coastal Commission in October of 2024.

Many of the same issues raised for that project also apply to Marin County Forest Health and Fire Resilience Public Works Plan. I urge the MWPA to withdraw this proposal and focus our tax dollars instead on what the science suggests is most effective—home hardening, defensible space within 100 feet of structures, and safe evacuation routes. This approach provides a more rational and efficient framework for protecting the public while safeguarding our priceless natural treasures.

B18.22

RESPONSE TO COMMENTS

Response B18.1

The commenter's opposition to the PWP is acknowledged.

Evacuation routes are a large part of the projects implemented by Marin Wildfire. Information regarding the West and Southern Marin Zones Coastal Evaluation Routes Projects can be found on the Marin Wildfire website at: <https://www.marinwildfire.org/project/west-marin-evacuation-route-core>.

Please refer to Response A9.1 for information regarding funding for home hardening.

Please see Response A3.2 for information on how vegetation treatments reduce wildfire risk and Response B1.1 regarding vegetation treatments beyond 100 feet of structures.

Response B18.2

Please refer to Response A3.2 regarding the determination that treatments referenced in the PWP would achieve the purpose of reducing wildfire risk and severity and the substantial amount of research supporting that determination. Projects proposed under the PWP do not include logging. Please see Response A3.9 regarding herbicide use.

Response B18.3

As discussed in Response A3.4, specific environmental effects of projects considered through the PWP will be disclosed in future environmental compliance documents, which would include review of noise, air pollution, and toxicity of emissions. As noted in Section 3.5 of the PWP, biomass disposal methods approved under the CalVTP include hauling, chipping and hauling, chipping and broadcasting, mulching using a tracked masticator, and pile burning. If biochar, bio oil, or biogas were proposed for any individual project, they would need to be analyzed under that specific project.

Response B18.4

One of Marin Wildfire's primary goals is education and outreach, which will help reduce human-caused fires; however, fire is a natural part of California's ecosystems and will continue to occur throughout the State. Please refer to Response B18.1 regarding evacuation routes and home hardening. The PWP does not identify specific vegetation management projects. Rather, it provides a planning framework to review and authorize future individual vegetation management projects in Marin County's Coastal Zone. Each individual project will be reviewed under the PWP including for public safety risks.

Response B18.5

PWPs are drafted specifically to comply with CCC requirements in the Coastal Zone of California. PWPs are meant to provide a single document that establishes a framework for comprehensive planning, reviewing, and permitting of activities that would otherwise trigger the need for individual Coastal Development Permits (CDPs). The only feasible alternative to the PWP is an individual CDP for a specific project because it is a framework for a permit, not a specific project. Please refer to Response B18.1 regarding evacuation routes, home hardening, and defensible space. The projects proposed under the PWP would not include logging,

RESPONSE TO COMMENTS

clearing, and/or substantially altering the structure of mature and old-growth forests. Section 3.4 of the PWP describes the types of projects and activities to be covered under the PWP.

Response B18.6

Please refer to Response A3.9 regarding the CalVTP PEIR legal challenge. The commenter is correct that the PWP includes potential work in Bishop Pine forest. Any projects proposed within that habitat would review potential environmental effects of a proposed project under a separate and project-specific environmental review.

Response B18.7

The language included in this comment refers to Mitigation Measure GHG-2 of the CalVTP PEIR which includes biooil as one potential method to reduce GHG emissions caused by prescribed burns. It is not a required method. This PWP does not include treatment assumptions that would reduce canopy to 10%. Each individual project would propose site-specific vegetation treatments based on the habitat and goals of that individual project.

The PWP does not identify specific vegetation management projects. Rather, it provides a planning framework to review and authorize future individual vegetation management projects in Marin County's Coastal Zone. Each individual project will be reviewed independently under the PWP with specific-project environmental review as recommended in this comment. Please refer to Response B18.1 regarding evacuation routes and home hardening. The CalVTP SPRs require monitoring the work of contractors.

Response B18.8

Section 5.2 of the PWP addresses the cumulative planning context of the PWP. The statement quoted in the comment was part of the introduction of the PWP to provide context for the overall PWP.

Response B18.9

The Greater Mill Valley Shaded Fuel Break is not within the PWP Program Area. The commenter is correct that Marin County as a whole has numerous documented northern spotted owl nesting sites and as noted in the table referenced, suitable habitat exists in the PWP Program Area so any individual project proposed under the PWP would complete additional environmental review, which would include review of any potential northern spotted owl nesting sites. Refer to Response A10.8 for a summary of survey requirements related to northern spotted owl.

Response B18.10

Lesmeister et al. (2018) provides a comprehensive overview of that status and threats to northern spotted owl habitat and population. This includes that vegetation treatments that remove canopy connectivity can reduce forest cover elements for spotted owls and their prey and that allowing shrubs and hardwood trees to develop in early-seral stands can benefit a variety of wildlife species associated with non-coniferous vegetation such as northern spotted owls. Lesmeister et al. (2021) also finds that thinning forest stands of all ages by increasing canopy base height, reducing crown contiguity and bulk density, and reducing forest fuels can

RESPONSE TO COMMENTS

degrade the suitability of forests for nesting. Cormier et al. (2024), which is specific to Marin County, identified habitat loss (from urban development and fuels management) as one of the lowest relative threats but acknowledged that there may be trade-offs from vegetation treatments in terms of the reduction in wildfire risk to owl habitat in the long term versus potential adverse effects to habitat or prey from treatments in the short term. Cormier et al. (2024) also references various modeling exercises that have found that while fuels treatments may reduce suitable roosting and nesting habitat in the short term, they substantially reduce habitat loss from wildfire and that untreated areas retain the highest potential fire risk. Projects under the PWP would typically negligibly affect canopy connectivity because they would focus on the removal of understory material and not large, mature trees that provide canopy cover. Additionally, the CalVTP SPR BIO-1 requires surveys to identify and document sensitive resources and to assess the suitability of habitat for special-status plant and animal species, such as northern spotted owl. If an area is determined to be suitable, potentially occupied habitat for northern spotted owl, the area would be physically avoided or additional review and surveys would be conducted to determine presence/absence of the species, when appropriate to minimize impacts on the species. In addition, CalVTP MM BIO-2a requires that canopy be retained at a percentage preferred by the species in tree canopy areas where existing suitable foraging habitat is present.

Based on research conducted to date, effects on northern spotted owl from the types of treatments included in the PWP are expected to be marginal in accordance with the conclusions above and that there could even be beneficial effects. Lesmeister et al. (2018) concludes that “disturbance processes (e.g., low- and mixed-severity wildfire, light to moderate thinning) that increase stand or landscape heterogeneity can have long-term benefits for spotted owls, as long as enough suitable forest cover for nesting and roosting remain within the territory.” As discussed previously, suitable forest cover in treated and non-treated areas would remain as a result of the incorporated CalVTP SPRs and MMs. The continued use of treated forested stands by northern spotted owls is supported by literature, as Irwin et al. (2015) found that spotted owls continued to use recently thinned stands. Marin Wildfire also notes that a consistent recommendation among this literature is to create a mosaic of structural conditions through multiple spatial scales to provide habitat for northern spotted owls post-treatment, which the proposed project would either maintain or improve.

Although the applicability to northern spotted owl of studies related to California spotted owl (a subspecies of the northern spotted owl) are uncertain, the availability of research on California spotted owl responses to vegetation treatments may provide some insight into how northern spotted owls respond. Overall, the research indicates that vegetation treatments can have mixed effects, both positive and negative, depending on how treatments change stand characteristics. Research has found that owl foraging behavior is negatively influenced by an increase in forest canopy gaps but that even areas with high canopy gaps receive some level of owl foraging, indicating that even treatments that reduce apparent foraging habitat do not entirely preclude this foraging (Gallagher et al. 2019). Research has also found that California spotted owls select for higher canopy base height, lower ladder fuel density, and lower canopy

RESPONSE TO COMMENTS

bulk density, which are the intended outcomes of the proposed project (Wright et al. 2023). Overall, recent modeled analysis of treatments and vegetation characteristics indicates that fuels reduction and forest restoration treatments are expected to benefit California spotted owls by improving the heterogeneity/mosaiced nature of forest stands and therefore improve nesting/roosting and foraging cover types (Jones et al. 2024; McGinn et al. 2025).

Response B18.11

Refer to Response A5.4 regarding project outreach.

Response B18.12

Refer to Response C6.1 regarding the before and after photos referenced by the commenter.

Response B18.13

Please refer to Response A3.9 regarding herbicide use.

Response B18.14

No deforestation of mature forest lands would be conducted as part of the PWP. Section 3.4 of the PWP describes the types of projects and activities to be covered under the PWP.

Response B18.15

Please see Response A3.2 regarding the determination that treatments referenced in the PWP would achieve the purpose of reducing wildfire risk and severity and a summary of the research supporting this statement.

Response B18.16

As noted in Section 3.5 of the PWP, biomass disposal methods approved under the CalVTP include hauling, chipping and hauling, chipping and broadcasting, mulching using a tracked masticator, and pile burning. If flammable material were to remain on site after treatment, specific parameters would be required to meet the CalVTP PEIR SPRs.

Response B18.17

Chapter 2 of the PWP does not discuss the cause of the Mount Vision fire and does not discuss the ecological result of the fire either positively or negatively. It discusses the loss of structures as a result of the fire in Inverness Park and that this loss of structures was destructive. The PWP in Section 2.1 acknowledges that much of the native vegetation species and communities of coastal Marin County have adapted to tolerate or, in some cases, require fire to propagate.

Response B18.18

As noted in Section 2.1 Marin Wildfire, in partnership with Marin County, member fire agencies, public and private landowners, technical advisors, the CCC, and other partners are leading a regional prioritization effort to identify, design, permit and implement multiple mission critical forest health and fuel load reduction projects within the Coastal Zone over the initial 10-year timeframe of this PWP. PWPs are meant to provide a single document that establishes a framework for comprehensive planning, reviewing, and permitting, allowing a suite of related activities that would otherwise trigger the need for individual Coastal

RESPONSE TO COMMENTS

Development Permits to instead be analyzed as an integrated and coordinated system, thus expediting the permitting process and saving money through use of a comprehensive permit vehicle. As such, it does not address home hardening because home hardening does not require a Coastal Development Permit.

Please refer to Response A9.1 for information regarding funding for home hardening.

Please see Response A3.2 for information on how vegetation treatments reduce wildfire risk and Response B1.1 regarding vegetation treatments beyond 100 feet of structures.

Response B18.19

As discussed in Response A3.4, specific environmental effects of projects considered through the PWP will be disclosed in future environmental compliance documents, which would include review of air pollution. As noted in Section 3.5 of the PWP, biomass disposal methods approved under the CalVTP include hauling, chipping and hauling, chipping and broadcasting, mulching using a tracked masticator, and pile burning. If biochar, bio oil, biogas, or biomass energy were proposed for any individual project, they would need to be analyzed under that specific project.

Response B18.20

Please refer to Response A3.5 regarding greenhouse gas emissions.

Response B18.21

The PWP does not include biomass projects. Section 3.4 of the PWP discusses the types of projects and activities covered under the PWP.

Response B18.22

The PWP in Section 2.1 acknowledges that much of the native vegetation species and communities of coastal Marin County have adapted to tolerate or, in some cases, require fire to propagate. The PWP does not include logging. While prescribed fire, cultural burning, and controlled wildland fire for wildfire risk reduction do not involve logging, broadcast burns, which may include cultural burns, are carried out with appropriate preparation, such as creating a fire line by removing fuels that will prevent the fire's spread outside of the target area, or by using existing abiotic features, such as fire roads.

The PWP acknowledges other nearby vegetation management projects in Section 5.2, Cumulative Planning Context. Logging is not proposed under the treatment activities for the PWP. Dead and dying or invasive trees may be removed on a specific project; however, the treatment for each individual project would be described in the environmental review document for that project. Each individual project would be required to comply with CalVTP SPRs which include protection for NSO and other wildlife, as well as other sensitive forests and native plants. Pre-implementation surveys for sensitive plants, wildlife, and nesting birds are required as part of these measures.

Please refer to Response A9.1 for information regarding funding for home hardening.

RESPONSE TO COMMENTS

Please see Response A3.2 for information on how vegetation treatments reduce wildfire risk and Response B1.1 regarding vegetation treatments beyond 100 feet of structures.

Response B18.23

Compliance of projects proposed under the PWP with Bay Area Air District (BAAD) requirements will be disclosed in the future environmental compliance documents. The PWP is not a Project-Specific Analysis, as alluded to by the commenter.

RESPONSE TO COMMENTS

Marin Wildfire also notes that BAAD Regulation 2, Rule 5: New Source Review of Toxic Air Contaminants is unlikely to apply to vegetation treatment projects due to low emission levels. Air curtain burning, kiln burning, carbonators, and other forms of incineration are regulated under BAAD Regulation 5, which requires the preparation of a Smoke Management Plan (BAAQMD 2019). Similar to pile burning and broadcast burning, a Smoke Management Plan would be submitted to the BAAD at least 30 days in advance of an air curtain burning, kiln burning, or carbonator use in accordance with BAAD Regulation 5 for open burning.

1.4.3 Comment Group C – Public Meeting

Comment Letter C1 – Bachich

6	a lot here tonight, I came for a little bit different	
7	reason than I thought would be here, but I'm a big	
8	advocate for the Marin Wildfire Prevention. But I'm	
9	in a little bit of a quandary with the, I think	
10	National Park Service, which -- NPS, which I have a	
11	property below the parking lot at Stinson Beach.	
12	And I bought it five years ago in the drought	
13	of 2020, and it is just full of snag trees. It's	
14	probably the tinderbox of Marin, and the westerly	C1.1
15	winds blow there up the hill, and will burn all of	
16	Marin County.	
17	And I cannot get the attention of the	
18	National Park Service other than they're worried about	
19	you walking down their trail. So I'm here to just put	
20	it out there that if anybody can help me with the	
21	National Park Service, because it's really creating a	
22	dangerous spot in Marin County and I feel like they	
23	kind of march to their own drum, you know, or band.	
24	And so I'm trying to figure out a little bit	
25	more about fire prevention and what I can do, and I'm	

Response C1.1

NPS lands are not included in the PWP program area. This comment is outside of the scope of the PWP.

RESPONSE TO COMMENTS

Comment Letter C2 – Binzen

15 I'm not a fire ecologist, nor an indigenous
16 person, but what I can do is share some of their
17 wisdom and generational experience of what it truly
18 means to be in right relationship with fire.

19 I'm going to start by quoting a few of
20 California's first people and some that California has
21 partnered with. Dee (indiscernible), "Traditional
22 fire practices involve the proprietary knowledge,
23 prayers and practices of our people."

24 The Karg, "It is impossible as well as
25 unethical to attempt to remove traditional ecological

C2.1

RESPONSE TO COMMENTS

Page 4

1 knowledge from its original context. Efforts to
2 extract knowledge are a form of cultural
3 appropriation."

4 The North Mono, "Agencies tend to focus on
5 acreage and fuel reduction. We're burning to thrive
6 on the land. We look to our grandchildren's
7 grandchildren."

8 The decisions we make and practices we do
9 today affect generations down the road. Perhaps we
10 need to pause and refocus. Instead of reacting from
11 fear, we need more respect, humility and wisdom. We
12 need to make decisions that bring us into right
13 relationship with the gift of fire.

14 I turned to some fire experts on this.
15 California Chaparral Institute. "Deforestation is not
16 only ineffective but can increase the chances of home
17 ignition. Trees are fire suppressing wind breaks and
18 block the heat of a wildfire. They can ignite
19 houses."

20 George Wuerthner, who's the author of 38
21 books on environmental issues and policy. "Rather
22 than reduce a wildfire's reach, thinning can sometimes
23 actually increase a fire's spread."

24 The Sierra Club. "What the tens of millions
25 of Americans living in rural communities within

C2.1

RESPONSE TO COMMENTS

Page 5

1 fire-adapted ecosystems really need, is for federal
2 and state lawmakers to focus on directly protecting
3 homes and lives from wildland fire, clearing
4 vegetation away from larger distances than 60 to 100
5 feet from homes offers no added benefit for home
6 protection, research shows."

C2.1

Response C2.1

Marin Wildfire acknowledges the statements quoted from some of California's indigenous communities. Marin Wildfire works with the Federated Indians of Graton Rancheria and other indigenous communities of the areas where work is ongoing, as required by the appropriate environmental compliance process, to ensure they are aware of the projects and have an opportunity to coordinate on any proposed methods of work. Marin Wildfire has consulted and coordinated with the Federated Indians of Graton Rancheria on the PWP and requested input on the methods and treatments. Refer to Section 1.3 of the PWP for a summary of tribal consultation and to Exhibit C for the Tribal Cultural Resource project standards.

Please see Response A3.9 regarding The Chaparral Institute and fire ignitions.

Please see Response A3.2 for information on how vegetation treatments reduce wildfire risk and Response B1.1 regarding vegetation treatments beyond 100 feet of structures.

Comment Letter C3 – Karin Lease

17 I really approve of the other three, but what
18 I wanted to say was other than the ocean, intact,
19 unmanaged forest provides the majority of services,
20 this low climate disruption, heating and loss of
21 biodiversity, intact forest, even standing dead or
22 burned trees request a significant amount of carbon,
23 attract and store water, create oxygen, and provide
24 habitat for thousands of interconnected species.
25 Applying herbicides, chainsaws and

C3.1

RESPONSE TO COMMENTS

Page 6

1 masticators will lead to much hotter, drier forests
2 and more wind that are actually more likely to burn,
3 it occurs to me. I'm not an expert. And the animals
4 that depend on the plants and trees for food, shelter
5 and cover would be killed and/or displaced, which
6 leads to death.

C3.1

7 In light of our impending eco collapse, I
8 just don't see how we would consider doing anything to
9 our forest that would create more heat. I understand
10 the fear, but we must be more intelligent than that
11 and preserve whatever intact forests that remain.

12 And the part that I think I'm really
13 concerned about is using herbicides in the forests,
14 that just horrifies me, that whole idea.

C3.2

15 So what would be the impacts of hundreds of
16 gallons of herbicides applied to coastal forests in
17 Marin? I have this funny quote, and it's not meant to
18 insult or put down anyone, but I like it.

Response C3.1

The types of projects and activities that would be proposed under the PWP are described in Section 3.4 Types of Projects and Activities to be Covered. Please see Response A3.2 regarding the determination that treatments referenced in the PWP would achieve the purpose of reducing wildfire risk and severity and a summary of the research supporting this statement.

Response C3.2

Please see Response A3.9 regarding herbicide use.

RESPONSE TO COMMENTS

Comment Letter C4 – Levin

1 the boundary of the PWP, and while I understand your
2 general plan tonight presented is you're trying to be
3 clear, I have a concern about how the individual
4 projects that are actually going to be chosen and
5 done, how they're going to be chosen. And nothing in
6 this presentation has addressed that.

C4.1

7 And so basically somebody is going to have
8 cart blanche to go ahead and do this plan, make it
9 reality, and I think that we need to know more about
10 how the specific acreages are going to be chosen and
11 why.

12 And I have similar concerns about
13 clear-cutting and using herbicides. I also question
14 the basic premise that protecting human habitat is
15 more important than protecting natural habitat. Thank
16 you.

C4.2

Response C4.1

The commenter is correct that the PWP does not determine which specific acres or projects would be treated as the PWP is a framework for comprehensive planning, reviewing, and permitting projects. Chapter 6 of the PWP describes the procedures for reviewing and authorizing each individual project once proposed to confirm whether it is as consistent with the Marin Wildfire's Forest Health and Fire Resilience PWP for vegetation treatment in the Coastal Zone that is carried out pursuant to the Board of Forestry's Final PEIR for the CalVTP or a different environmental compliance process. Specific environmental effects of projects considered through the PWP will be disclosed in future environmental compliance documents. Section 6.3 provides the list of activities required prior to approval of each individual project which includes additional notification of nearby landowners and other interested parties which will provide the specific acres and rationale for each project as requested in the comment.

Response C4.2

The types of projects and activities that would be proposed under the PWP are described in Section 3.4 Types of Projects and Activities to be Covered and do not include clear-cutting trees. Please see Response A3.9 regarding herbicide use.

RESPONSE TO COMMENTS

Comment Letter C5 – Jack Gescheidt

Page 0

1 thing which as the gentleman just before me said,
2 going into the forest beyond a hundred feet from
3 houses is not necessary. Thinning and treating
4 forests, forests beyond a hundred feet from the houses
5 makes them sunnier and hotter, drier, windier, and
6 more flammable.

C5.1

8 Project, also representing Independence of Animals,
9 25,000 members in California alone. Treat houses, not
10 wildlands. Home harden defensible space, not
11 chainsaws and herbicides. That is the main point.
12 Beyond a hundred feet leave wildlands alone.
13 This applies beyond a hundred feet. Beyond a
14 hundred feet.

C5.2

Response C5.1

Please see Response A3.2 for information on how vegetation treatments reduce wildfire risk and Response B1.1 regarding vegetation treatments beyond 100 feet of structures and the determination that treatments referenced in the PWP would achieve the purpose of reducing wildfire risk and severity and a summary of the research supporting this statement.

Response C5.2

Please refer to Response A3.1 regarding home hardening.

Comment Letter C6 – Cedar

22 MS. CEDAR: Hi there. I just want to first
23 address your before and after pictures. I live in
24 Fairfax, really close to open space, and your team
25 went through and decimated a huge area by where I live

C6.1

RESPONSE TO COMMENTS

1 and it looked like a bomb went off after you did your
2 work.

3 So the before and after pictures that you
4 show are nothing of what is the reality of what
5 happens when your team goes in. It was -- it brought
6 me to tears. I go on a regular hike up there and it's
7 just so sad to see it.

C6.1

8 So now what I prepared. We humans, when will
9 we learn to leave nature alone. It's in our best
10 interest to leave nature alone. A forest's eco system
11 is a community of living organisms, plants, animals
12 and micro organisms, interacting with each other in
13 their physical environment, sun, soil, air, water,
14 it's characterized by the dominant trees performing a
15 closed canopy, creating a unique environment for high
16 biodiversity that is crucial for ecological balance.

17 These eco systems play vital roles in
18 regulating climate, storing water and supporting life.
19 The work being proposed doesn't make sense. You're
20 going to kill healthy, natural eco systems to protect
21 against wildfires? I think that's ridiculous.

C6.2

Response C6.1

The commenter did not reference which specific project she described in Fairfax and Marin Wildfire has completed limited work in that area so is not able to respond directly to the effects of the project Ms. Cedar referenced. The before and after photos shared with the community during the presentation represent recent and varied Marin Wildfire work and are typical of what would be completed under the PWP. Additional details and photos of recent work completed by Marin Wildfire are available on the website at <https://www.marinwildfire.org/vegetation-management>. Marin Wildfire regularly organizes fieldtrips to visit worksites and invites the interested public to participate and ask questions.

RESPONSE TO COMMENTS

Response C6.2

Please refer to Response A.1.1 regarding loss of biodiversity and the role of vegetation management.

Comment Letter C7 – Andy Bunnell

7 However, and this is a huge however, I do not
8 appreciate the forest management mania that has
9 infested Marin County. Keep wild wild. Not
10 masicated, chainsaw, herbicide. Okay. I first became
11 concerned about this when I was shocked to learn that
12 there was a deforestation plan for the Tomales Bay
13 park. I love that place, I discovered it fairly
14 recently.

C7.1

15 I was like, oh, my God, it's wild. It needs
16 to stay wild, it's a wild eco system and why the rush
17 to manage, there's no defensible spaces around there,
18 oh, my God.

19 I'm not as familiar with the other areas, but
20 I was even more alarmed to find out that there's plans
21 to do more, and I'm not sure if it's 39,300 acres,
22 which I found somewhere, or 44,000.

23 How am I doing? Uh-oh. So the human plan,
24 control of the natural eco system will make it more
25 drier, hotter, sunnier, and windier, seems like a

C7.2

Page 12

1 perfect storm for destructive wildfires.

C7.2

RESPONSE TO COMMENTS

8 Okay. (Indiscernible) did not want to die
9 through manmade mismanagement, so leave it alone.
10 Preserve habitat with habitat recess Yen's, how about
11 that concept? How are the killed trees going to be
12 managed? Are they going to be chipped? And isn't
13 that going to be a fuel load? Right? Chips to go
14 where or are they going to stay on the forest floor?

C7.3

Response C7.1

As noted in Section 3.3, the program area for the PWP is approximately 44,210 acres. This is the total area where work could occur; however, the acres of work completed would be much smaller than the total acres and would undergo additional environmental review for each proposed project prior to implementation. The types of projects and activities that would be proposed under the PWP are described in Section 3.4 Types of Projects and Activities to be Covered. Details and photos of recent work completed by Marin Wildfire which would be similar to what would be proposed under the PWP are available on the website at <https://www.marinwildfire.org/vegetation-management>.

Response C7.2

Please refer to Response A3.2 and Response A11.4 regarding vegetation treatment and forest temperature.

Response C7.3

As noted in Section 3.5 of the PWP, biomass disposal methods approved under the CalVTP include hauling, chipping and hauling, chipping and broadcasting, mulching using a tracked masticator, and pile burning. The method used to dispose of biomass would depend on each projects proposed vegetation treatments, access to existing, nearby roads, and other project-specific details. If chipping and broadcasting were used as a biomass disposal method for a project, fuel load would be taken into consideration when planning the individual project.

Comment Letter C8 – Fianna Mitchell

4 I have two concerns, mainly. One of which
5 you may or may not have gone over, is that is there
6 any way to stop the fires from starting in the first
7 place, I just wanted to point that out.

C8.1

RESPONSE TO COMMENTS

18 (indiscernible). No disrespect, but I do not agree
19 with some of the ways you guys are doing this, those
20 pile burnings can start fires, and I don't know if
21 there something you can do besides the pile burns.
22 You might not take me seriously but I'm
23 someone that is involved with climate change, I keep
24 track of it. Is there something you can do to, like,
25 clear them, like clear the forest, clear some of the

C8.2

Page 14

1 forest without doing the pile burnings, and clear some
2 vegetation without doing pile burnings, because pile
3 burnings can make smoke, they can cause fires. That's
4 all I'm going to say. Thank you for your time.

C8.2

Response C8.1

As noted in Section 2.2 of the PWP, the Marin coast is particularly vulnerable to catastrophic wildfires due to historic development patterns in Wildland Urban Interface (WUI) areas, departure from natural fire return intervals, long response times for first responders, strong winds, and resource management patterns. One of Marin Wildfire's primary goals is education and outreach, which will help reduce human-caused fires. Fire is a natural part of California's ecosystems and will continue to occur throughout the State.

Response C8.2

Pile burning, if done incorrectly, can start fires. However, pile burning with careful planning, including coordination with the local air district, can be a safe and effective way to address excess biomass. Section 3.5.1 of the PWP describes the requirements needed prior to pile burning. Additionally, each project-specific environmental analysis would review the potential effects of pile burning, if proposed as a vegetation treatment method, and require measures to reduce any potential effects, including the risk of fire starts.

RESPONSE TO COMMENTS

Comment Letter C9 – Abby Cunningham

17 I think that given the project executions in
18 the past of some of the things that you've done and
19 the community concerns that have been raised about the
20 slash everywhere, the fires look hotter, drier, more
21 susceptible to flames, I don't think that each of
22 these projects is going to go through an additional
23 level of compliance, and I don't think the biomass air
24 burners are the answer, and I think Marin
25 unfortunately is being target by biomass industries

C9.1

C9.2

Public Works Department
Page 19

1 for feedstock utilization.

2 And I think what we need to do is leave our
3 forests wild, we need to focus on safe evacuation
4 routes, I appreciate the home hardening inputs, I
5 think what we need to do is provide low cost loans for
6 people who can't afford to retrofit their homes,
7 because not everybody in Marin can.

C9.3

8 And finally, I just want to say that it's
9 unfortunate that this meeting wasn't provided over
10 Zoom so that more people could participate.

11 There's also another event going on where
12 people are kind of involved in that, and so there's
13 less opportunity for public participation, and to have
14 it only in person and in a small place on the coast
15 doesn't seem appropriate given the level of treasures
16 that we will lose as a result of these shortsighted
17 programs.

C9.4

RESPONSE TO COMMENTS

18 And finally, I would like to know how you are
19 going to differentiate in the sweeping PWP the
20 different eco systems, because I don't think your maps
21 have the level of fidelity that they need to really
22 give a clear picture of what it looks like on the
23 ground and which assets are being used.

C9.5

6 issues since the very beginning, I haven't really felt
7 heard about my pesticide concerns, nor about the
8 industry focus frankly of pulling biomass out of Marin
9 to produce an industrial product because biochar,
10 which would be part of this program, likely is a
11 valuable commodity with a variety of industrial
12 applications.

C9.6

13 That's all that I have to say, so please
14 focus more on helping seniors and people with limited
15 income harden their homes, and enough of this
16 vegetation management stuff, because it's not working
17 and it looks terrible.

C9.7

Response C9.1

Please refer to Response A3.2 and Response A11.4 regarding vegetation treatment and forest temperature.

Chapter 6 of the PWP describes the procedures for reviewing and authorizing each individual project once proposed to confirm whether it is as consistent with the Marin Wildfire's Forest Health and Fire Resilience PWP for vegetation treatment in the Coastal Zone that is carried out pursuant to the Board of Forestry's Final PEIR for the CalVTP or a different environmental compliance process. Specific environmental effects of projects considered through the PWP will be disclosed in future environmental compliance documents. Section 6.3 provides the list of activities required prior to approval of each individual project which includes additional notification of nearby landowners and other interested parties which will provide the specific acres and rationale for each project as requested in the comment.

RESPONSE TO COMMENTS

Response C9.2

As noted in Section 3.5 of the PWP, biomass disposal methods approved under the CalVTP include hauling, chipping and hauling, chipping and broadcasting, mulching using a tracked masticator, and pile burning. If air curtain burners were proposed for any individual project, this tool would need to be analyzed under that specific project.

Response C9.3

Please refer to Response A9.1 for information regarding funding for home hardening.

Response C9.4

Marin Wildfire held an in-person public meeting in Point Reyes because the PWP process requires a meeting on the PWP to be held within the Coastal Zone to provide opportunity for public comment by the communities who would be most impacted. Additional comment may be provided at the Marin Wildfire Board of Directors Public Meeting in San Rafael in person or virtually.

Please refer to Section 1.2 regarding outreach conducted by Marin Wildfire for the PWP. Additional outreach is required for each individual project proposed under the PWP as described in Chapter 6 of the PWP.

Response C9.5

Chapter 6 of the PWP describes the procedures for reviewing and authorizing each individual project once proposed to confirm whether it is as consistent with the Marin Wildfire's Forest Health and Fire Resilience PWP for vegetation treatment in the Coastal Zone that is carried out pursuant to the Board of Forestry's final PEIR for the CalVTP or a different environmental compliance process. Specific environmental effects of projects considered through the PWP will be disclosed in future environmental compliance documents. This includes additional review of the specific habitat where the vegetation treatment would occur, including potential reconnaissance survey to support the environmental review.

Response C9.6

Please refer to Response A1.1 regarding use of herbicides. As noted in Section 3.5 of the PWP, biomass disposal methods approved under the CalVTP include hauling, chipping and hauling, chipping and broadcasting, mulching using a tracked masticator, and pile burning. If biochar were proposed for any individual project as a biomass disposal method, it would need to be analyzed under that specific project.

Response C9.7

Please refer to Response A9.1 for information regarding funding for home hardening.

RESPONSE TO COMMENTS

Comment Letter C10 – Achilles

1 job to protect our homes from fires and there are more
2 fires now due to climate change. I resist the word
3 manage, it's a very male way of going about things and
4 where did that get us, where did this whole male we're
5 going to manage it, we're going to fix it, we're going
6 to cut it, we're going to just -- where did that get
7 us in the country, where did that get us? So I'm
8 resisting that for that reason.

C10.1

17 encroachment, protecting ourselves like the previous
18 woman said, get the (indiscernible) to deal with your
19 houses, do whatever amount of hardening, defensible
20 space, but leave these animals alone, you guys don't
21 understand ecosystems, you have no clue about the deep
22 equality, and the deep (indiscernible) and the
23 ecosystems, we have no idea of the high intelligence
24 nature, we're stupid dumb fucks as humans. Thank you.

C10.2

Response C10.1

Please refer to Response A9.1 for information regarding funding for home hardening. Chapter 3 of the PWP describes the types of projects and activities that would be covered under the PWP and the range of proposed activities.

Response C10.2

Please refer to Response A9.1 for information regarding funding for home hardening. Chapter 6 of the PWP describes the procedures for reviewing and authorizing each individual project once proposed to confirm whether it is as consistent with the Marin Wildfire's Forest Health and Fire Resilience PWP for vegetation treatment in the Coastal Zone that is carried out pursuant to the Board of Forestry's final PEIR for the CalVTP or a different environmental compliance process. Specific environmental effects of projects considered through the PWP will be disclosed in future environmental compliance documents.

RESPONSE TO COMMENTS

Comment Letter C11 – Emily Bartlett

8 I don't know if you know about Bolinas.

9 Bolinas has one road, basically, from the mesa down
10 to -- to get out of town. That particular area has
11 been a challenge for our community, it's an area that
12 has been a hot topic, for those of you who don't know
13 I just want to say that I appreciate the work that's
14 being done here by the individuals who are taking the
15 time to figure out how to make the laws work, how to
16 work within the structures that exist today.

17 We talk about the human problem and as
18 someone that lives on the mesa that has one road to
19 leave if there's a fire, I get excited if there's an
20 opportunity for trees that may harm us will be
21 removed.

22 I know there are a lot of concerns about
23 butterflies and there's a lot of concerns about a lot
24 of different things, and a lot of people with a lot of
25 different opinions, but one thing I do know is that

C11.1

1 this project does seem like an opportunity for our
2 community to have a chance to survive if there is a
3 catastrophic traffic fire.

4 I watched lines of people trying to leave
5 town during the Woodward fire. So for all the
6 concerns that everyone seems to have, I'm just
7 commenting on the fact that this project does appear
8 to have an opportunity to solve that for us, so I am

C11.1

Response C11.1

The commenter's support for the PWP and associated roadwork is acknowledged.

RESPONSE TO COMMENTS

Comment Letter C12 – Jennifer Howard

5 everyone, if we were really not interfering with fire,
6 we would let it burn. And I don't think that's good
7 for the eco system. If we let our houses burn they
8 emit a lot of poison into the atmosphere. If we let a
9 breathing hot fire burn, it destroys the earth.

10 I really trust the science that Marin
11 Wildfire is following, and I think that a lot of the
12 comments come from a real lack of study of what
13 they're planning to do.

14 As was said earlier, it's not a deforestation
15 process, it's a very careful process to protect homes

C12.1

Response C12.1

The commenter's support for the project is acknowledged.

RESPONSE TO COMMENTS

Comment Letter C13 – Felix Chamberlain

1 The home hardening thing is extremely
2 important as I just think everybody on any side of the
3 argument has said tonight, the problem with home
4 hardening is you -- the program is up and running,
5 they're getting their language straight and they're
6 making some mistakes, but overall the program is up
7 and running, the problem is getting the people in the
8 homes to react to either the suggestions PWP is making
9 about defensible space, or do something on their own.

C13.1

10 And of course we know when organizations or
11 agencies step in and either suggest or mandate action,
12 then that's an invasion of privacy and Americans hate
13 that. So getting people to do stuff isn't as easy as
14 just asking them to do it.

15 Second of all, there is a tremendous amount
16 of knowledge about forestry and the forests in this
17 room, it isn't a (indiscernible), what they're doing
18 isn't wrong. If you don't approve of it or agree with
19 it, that's one thing. But there does need to be some
20 sort of a plan.

21 If the Woodward fire hadn't been addressed,
22 if it had just burned, that's a big question to me.
23 So anyway, I'm very supportive of your efforts, thank

Response C13.1

Please refer to Response A9.1 for information regarding funding for home hardening.

The commenter's support for the project is acknowledged.

RESPONSE TO COMMENTS

1.4.4 Form Letters

Approximately 9,921 form letters were received. Minor variations were present among a minority of the letters, but all provided comments on similar topics. An example form letter is provided below alongside responses to the comments within the letter.

“Vegetation management” in the Marin County coastal plan increases wildfire danger

Barbara Zingg <bzingger@everyactioncustom.com>
Reply-To: bzingger@aol.com
To: MarinWildfire-PWP@panoramaenv.com

Fri, Aug 29, 2025 at 5:50 PM

Dear Panorama Environmental,

I am writing to you with an urgent plea to amend your draft coastal wildfire resilience plan (“Draft Marin County Forest Health and Fire Resilience PWP”).

Your project contains some home hardening measures, defensible space treatments, grants for these, and emergency evacuation preparedness planning, which are all commendable. These are the proven, effective treatments to protect houses and structures, from the house-out, not from the forest-in. D1.1

I strongly oppose and object to all the pointless, ineffective “vegetation management” beyond the 100 ft. home defensible space zone.

Wild forests do not need to be, and should not be “thinned” or “managed.” Chainsaws, toxic chemical herbicides, industrial masticating machines, and controlled burns make forests and wildlands more, not less, prone to wildfire risk. D1.2

In addition, thousands of wild animals will die when their homes are destroyed in the process of vegetation management with machines and chemical poisons. D1.3

Precious coastal Marin wildlands and forests are the most fog-drenched areas of the county. Cutting down thousands of trees and grinding up tens of thousands of smaller wild plants will make our neighborhood forests hotter, drier, windier, and even *more* flammable. D1.4

I strongly urge you to reallocate the “vegetation management,” “thinning,” and “fuel reduction” expenditures in this draft plan to protect Marin County coastal communities. Spend public tax dollars making houses ignition-resistant with home hardening and defensible space treatments close to houses, mostly within 30 feet and not over 100 feet away. D1.5

These are the only proven, effective methods for protecting houses in the uncontrollable, wind-driven wildfires that have destroyed entire communities in recent years. Cutting into wild forests and other undeveloped wildlands will only make forests more fire-prone and increase life-threatening danger to the public.

In addition, countless thousands of wild animals — including foxes, owls, woodrats, mice, bats, opossums, raccoons, hawks, woodpeckers, rabbits, and many more- will be driven from their homes for no good reason. Their homes will be destroyed so they can never return, which is both cruel and pointless. D1.6

I do support the other community-protecting components of the draft plan, including emergency preparedness and allocating funds to help residents treat their houses. I would support this project, rather than oppose it, if you removed all “vegetation management” beyond 100 feet from homes, and spent money wisely on the plan’s other, effective components. D1.7

Thank you for your attention to this urgent matter.

Sincerely,
Ms Barbara Zingg
Prescott, AZ 86305-4560

Response D1.1

Refer to Response A3.1 and Response A9.1 for a discussion of the multi-pronged approach that Marin Wildfire takes to wildfire resilience.

RESPONSE TO COMMENTS

Response D1.2

Refer to Response A3.2 and Response A11.4 for relevant literature that Marin Wildfire has reviewed as part of the PWP process that document the effectiveness of vegetation treatments at reducing wildfire risk and severity.

Response D1.3

Refer to Response A3.4 for a summary of the project process that would disclose site-specific effects to wildlife species. Note that all projects proposed under the PWP would be subject to the Coastal VTS in Exhibit A and the CalVTP SPRs in Exhibit B.

Response D1.4

Refer to Response A3.2 and Response A11.4 for relevant literature that Marin Wildfire has reviewed as part of the PWP process that document the effectiveness of vegetation treatments at reducing wildfire risk and severity.

Response D1.5

Refer to Response A3.1 and Response A9.1 for a discussion of the multi-pronged approach that Marin Wildfire takes to wildfire resilience.

Response D1.6

Refer to Response A3.4 for a summary of the project process that would disclose site-specific effects to wildlife species. Note that all projects proposed under the PWP would be subject to the Coastal VTS in Exhibit A and the CalVTP SPRs in Exhibit B.

Response D1.7

The commenter's support for home hardening and defensible space work is acknowledged. Refer to Response A3.1 and Response A9.1 for a discussion of the multi-pronged approach that Marin Wildfire takes to wildfire resilience.

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