

1. FOUNDATION OF THE FMP

Federal agencies that manage large tracts of public land having vegetation capable of sustaining wildland fire are required by federal policy to develop FMPs and to ensure that the FMPs be updated to keep current with periodic changes to federal wildland fire management policy and must undergo NEPA and other environmental regulatory requirements. The GGNRA FMP develops the implementation strategy selected by the NPS Pacific West Regional Director at the conclusion of a multi-year EIS process involving public and regulatory agency consultations. The Operational FMP provides a framework for all fire management activities and the management of wildland fire and prescribed fire as a tool to safely accomplish protection and resource management objectives on NPS lands.

The ROD that concluded the NEPA process is Appendix C to this FMP; the Mitigation Measures adopted through the ROD are Appendix D. Together these documents summarize the findings of the EIS regarding the selected strategy, describe the decision taken and the decision-making process and list the specific procedures to protect the environment the NPS will follow when implementing FMP projects. The Operational FMP which provides specific implementation detail is grounded in the goals, objectives and implementation strategy developed in the NEPA process and is circumscribed by the park's commitment to the public and regulators to abide by the mitigation measures adopted through the ROD.

1.2 RELATIONSHIP TO FEDERAL FIRE MANAGEMENT POLICY

NPS fire management actions must conform to adopted plans and policies of the Department of the Interior and the National Park Service. These include the Federal Wildland Management Policy, NPS Management Policies (2006), Director's Order #18 (2005) and Reference Manual #18 (2006b), the guidance documents for wildland fire management in the NPS, as well as the General Management Plan and resource management plans for GGNRA.

1.2.1 Federal Wildland Fire Management Policy (2001)

In 2001, the Interagency Federal Wildland Fire Policy Review Working Group revised and updated the Federal Wildland Fire Management Policy (NIFC 2001), which applies to all federal land management agencies. The key element of the policy is that firefighter and public safety is the first priority. In addition, the policy states that fire, as a critical natural process, will be integrated into land and resource management plans and activities on a landscape scale, and across agency boundaries. The policy also directs that fire management plans and programs will be based on a foundation of sound science. Research will support ongoing efforts to increase our scientific knowledge of biological, physical, and sociological factors.

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1.2.2 National Park Service Management Policies (2006)

NPS adopted revised Management Policies on August 31, 2006 which update the 2001 Management Policies under which the FMP NEPA process was conducted. In Section 4.5, the 2006 Management Policies expand the scope of issues that specifically need to be addressed in FMPs to include:

- “determining in which situations natural regeneration of a burned ecosystem is appropriate and when management actions are needed to restore, stabilize, or rehabilitate an area following wildland fire”,
- “addressing the need for adequate funding and staffing to support the planned fire management program”,
- address[ing] strategies for preventing the accumulation of hazardous fuels *in specific areas* and for eliminating hazardous conditions that may have developed over time due to past fire suppression programs or ongoing development activities. These strategies will entail strategic planning, interdisciplinary coordination, and inter-organizational collaboration as needed to provide appropriate treatment using adaptive management practices that range from site specific to landscape level. “
- Measures to protect or rescue cultural resources in the event of an emergency, disaster, or fire will be developed as part of a park’s emergency operations and fire management planning processes (Section 5.3.1.1.)

The Management Policies direct each park to carefully consider the option of wildland fire use based on the specific environmental, safety and logistical conditions of each wildland fire. GGNRA carefully considered the option of wildland fire use in developing the FMP EIS and concluded that GGNRA will be a full suppression park employing Minimum Impact Suppression Tactics (MIST) to the extent possible and a flexible suppression strategy that permits the appropriate approach to be used to suppress a fire (confine, contain or control) based on input from park staff, suppression forces, and adjacent landowners.

All fire management plan requirements in the revised Management Policies that are not currently addressed in the FMP will be developed and adopted in subsequent FMP Annual Review processes. It is conceivable that the development of new park procedures may require additional NEPA and/or Endangered Species Act (ESA) compliance. More details on wildland fire management, including interagency and Department of the Interior policies and requirements, are contained in Director’s Order #18: Wildland Fire Management. These documents provide the detail necessary to develop the components of Fire Management Plans and other companion plans, such as monitoring or communication plans.

Excerpts from 2006 Management Policies, Section 4.5, Fire Management

Regarding Fire Management Plans: “Parks with vegetation capable of burning will prepare a fire management plan that is consistent with federal law and departmental fire management policies, and that includes addressing the need for adequate

funding and staffing to support the planned fire management program. The plan will be designed to guide a program that:

- responds to the park's natural and cultural resource objectives;
- provides for safety considerations for park visitors, employees, and developed facilities;
- addresses potential impacts on public and private neighbors and their property adjacent to the park; and
- protects public health and safety.

Regarding Overall Strategy: "All fires burning in natural or landscaped vegetation in parks will be classified as either wildland fires or prescribed fires. All wildland fires will be effectively managed through application of the appropriate strategic and tactical management options. These options will be selected after comprehensive consideration of the resource values to be protected, firefighter and public safety, and costs."

Regarding Wildland Fire Suppression: "All wildland fires will be effectively managed through application of the appropriate strategic and tactical management options as guided by the park's fire management plan. These options will be selected after comprehensive consideration of the resource values to be protected, firefighter and public safety, costs, availability of firefighting resources, weather, and fuel conditions. "

"All parks will use a systematic decision-making process identified in their fire management plans or other documents to determine the most appropriate management strategies for all unplanned ignitions and for any naturally or management-ignited fires that are no longer meeting resource management objectives."

1.2.3 Director's Order #18, Wildland Fire Management (2005)

Director's Order #18, Section 5(2)(a), builds on the requirement from the Federal Wildland Fire Management Policy and reiterated in the NPS Management Policies that, "Every park area with burnable vegetation must have a fire management plan approved by the Superintendent." Director's Order #18 (NPS 2005) specifically addresses the direction and content expected in the FMPs prepared for NPS units.

The FMPs will:

1. Reinforce the commitment that firefighter and public safety is the first priority.
2. Describe wildland fire management objectives that are derived from land, natural, and cultural resource management plans and address public health issues and values to be protected.
3. Address all potential wildland fire occurrences and consider the full range of wildland fire management actions.

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4. Promote an interagency approach to managing fires on an ecosystem basis across agency boundaries and in conformance with the natural ecological processes and conditions characteristic of the ecosystem.
5. Include a description of rehabilitation techniques and standards that comply with resource management plan objectives and mitigate immediate safety threats.
6. Be developed with internal and external interdisciplinary input and reviewed by appropriate subject matter experts and all pertinent interested parties, and approved by the park superintendent.
7. Comply with the NEPA and any other applicable regulatory requirements.
8. Include a wildland fire prevention analysis and plan.
9. Include a fuels management analysis and plan.
10. Include procedures for short and long term monitoring to document that overall programmatic objectives are being met and undesired effects are not occurring.

Director's Order 18 requires that a Reference Manual be prepared to "help NPS managers and field staff understand and implement Departmental and NPS policies applicable to fire management. The reference manual will contain detailed procedures emphasizing personnel safety, the use of wildland fire for beneficial purposes, monitoring of smoke behavior and the concept of risk management." The Reference Manual for DO #18 is published only online and is available at http://www.nps.gov/fire/fire/fir_wil_pla_reference18.cfm.

1.3 RELATIONSHIP OF FMP TO GGNRA PLANNING

1.3.1 GGNRA General Management Plan and General Management Plan Update

In 1980, GGNRA and PRNS collaborated on a joint planning and NEPA process that produced a joint General Management Plan (GMP) and Environmental Assessment. The GMP EA (NPS 1980) recognized the need to incorporate prescribed burning into research programs designed to enhance ecosystem management in the park. The GMP defined a series of land management zones to guide the strategy for "how the park will be managed and developed in the future based on legislative and administrative requirements, resource studies, and public preferences." This zoning approach allows for the treatment of specific resources, while relating them to an overall approach to the park as a whole. Fire management actions for different areas of the park need to respect and reflect this current zoning, to minimize visitor, user, and resource management conflicts.

The park is currently in the initial stages of preparing a new general management plan to replace and update the 1980 GMP. PRNS is undergoing a similar process. The new GGNRA GMP will address those lands directly administered by the park focusing on sites that do not have recent land use plans, such as Muir Woods National Monument and the San Mateo County lands that have been added to the park since 1980. Planning for Area A of the Presidio, Fort Baker, and lower Fort Mason Center will not be addressed in the GMP update as these sites have recently updated land use

management plans. Golden Gate lands north of the Bolinas-Fairfax Road will be addressed in the *Point Reyes National Seashore General Management Plan Update*; that process is ahead of the process at GGNRA and a Draft EIS will soon be released for public review.

1.3.2 GGNRA Natural Resource Management Plan

The Natural Resources Management Plan (1999) describes the status of GGNRA's natural resources and a park-wide program aimed at resource preservation, monitoring, maintenance, and restoration. A primary challenge identified by the plan is how the park will address the changes in ecosystem composition and accumulation of fuels resulting from the focus over the past century on suppression of all fires.

The Natural Resource Management Plan recognizes the benefits that can be gained through hazardous fuel reduction programs, including prescribed burning, geared towards preventing catastrophic losses of park resources from unplanned ignitions. Consistent with the GGNRA FMP in force at the time it was drafted, the Natural Resource Management Plan calls for prescribed fire to be used to revitalize fire-adapted communities and reduce the encroachment of fire-sensitive trees. Prescribed burning and fire effects monitoring is woven into strategies for protection of the endangered San Bruno elfin butterfly, Mission blue butterfly, Northern spotted owl, old-growth forest species, and a rare manzanita and ceanothus species found in GGNRA. Since habitat modification through prescribed fire and mechanical fuel reduction projects can have direct and indirect effects on wildlife and their habitats, the plan calls for careful interdisciplinary planning to protect existing habitat values and guide habitat enhancement.

1.3.3 GGNRA Cultural Resource Management Plan

The GGNRA Cultural Resource Management Plan (1998) is a prioritized listing of 128 cultural resource projects for the park providing a problem statement, description of the recommended project or activity, and an estimate of budget and staff needed to complete each project. The Cultural Resource Management Plan does not include overarching objectives for resource protection and does not address fire management planning as a strategy. A forthcoming update of this plan may incorporate objectives that integrate both fire and vegetation management as means to protect, restore, or rehabilitate cultural resources and landscapes within the park.

1.4 RELATIONSHIP OF FMP TO LOCAL FIRE MANAGEMENT PLANNING

1.4.1 Marin County Fire Department

1.4.1.1 Marin County Fire Management Plan

The Marin County Fire Department has developed a Marin County Fire Management Plan that addresses the threat and prevention of wildfires in Marin County.

1. To create wildfire protection zones that increase safety for firefighters and reduce risk to park neighbors.

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2. To assess all wildlands, not just the state responsibility areas. Analyses will include all wildland fire service providers: federal, state, local government, and private. It will identify high risk, high value areas, and develop information on and determine who is responsible, who is responding, and who is paying for wildland fire emergencies.
3. To identify and analyze key policy issues and develop recommendations for changes in public policy. Analysis will include alternatives to reduce the total losses by increasing fire protection system effectiveness.
4. To focus and monitor the wildland fire protection system in fiscal terms. This will include all public and private expenditures and economic losses.
5. To translate the analyses into public policies.

1.4.1.2 *Marin County Community Wildland Fire Protection Plan (CWPP)*

Adopted by the Marin County Board of Supervisors in July 2005, the CWPP provides guidance to the Marin County Fire Department (MCFD) in creating a more efficient fire-protection program focused on meaningful solutions to better protect Marin communities. The CWPP identifies areas where cost-effective, pre-fire management investments can be made to help minimize citizen losses and reduce costs from a major wildfire. With a CWPP approved and signed by the State Fire Marshall, MCFD may apply for National Fire Plan funding to complete the projects proposed in the CWPP.

The CWPP proposes a 5-part strategy to protect homes mapped as “at risk” by reducing fuel hazards using an integrated approach of the following elements:

- (1) Fuelbreak Network. MCFD has been working cooperatively with other local agencies and landowners to develop a 40-mile long system of fuel breaks (see Figure 2, Marin Co. CWPP Map) sited so as to take advantage of ridgetop roads and naturally occurring areas of lower fuels, such as grasslands. The fuel breaks will reduce the potential for a wildland fire to spread into the interface area from open space areas. The first several sections of the fuel breaks are proposed largely for GGNRA-managed lands (see Table 1, CWPP Fuelbreak Sections on GGNRA Lands).
- (2) Fire-Prone Forest Clearing. MCFD will continue clearing stands of flammable eucalyptus and Monterey pine that endanger residential communities.
- (3) Access Improvements. MCFD will continue to improve roadside fuel reduction and construct turnouts where needed.
- (4) Wildfire Awareness Campaign. MCFD will conduct community outreach to wildland-urban interface neighborhoods.
- (5) International Urban-Wildland Interface Code Adoption. The Board of Supervisors adopted a new County building code ordinance on 9/12/06, 2006 requiring each new residential project in the wildland urban interface zone (WUI) to have a fire protection plan. The Marin County WUI zone is shown in Figure 2, Marin Co. CWPP Map.

Figure 2 -- Marin County Community Wildfire Protection Plan Map

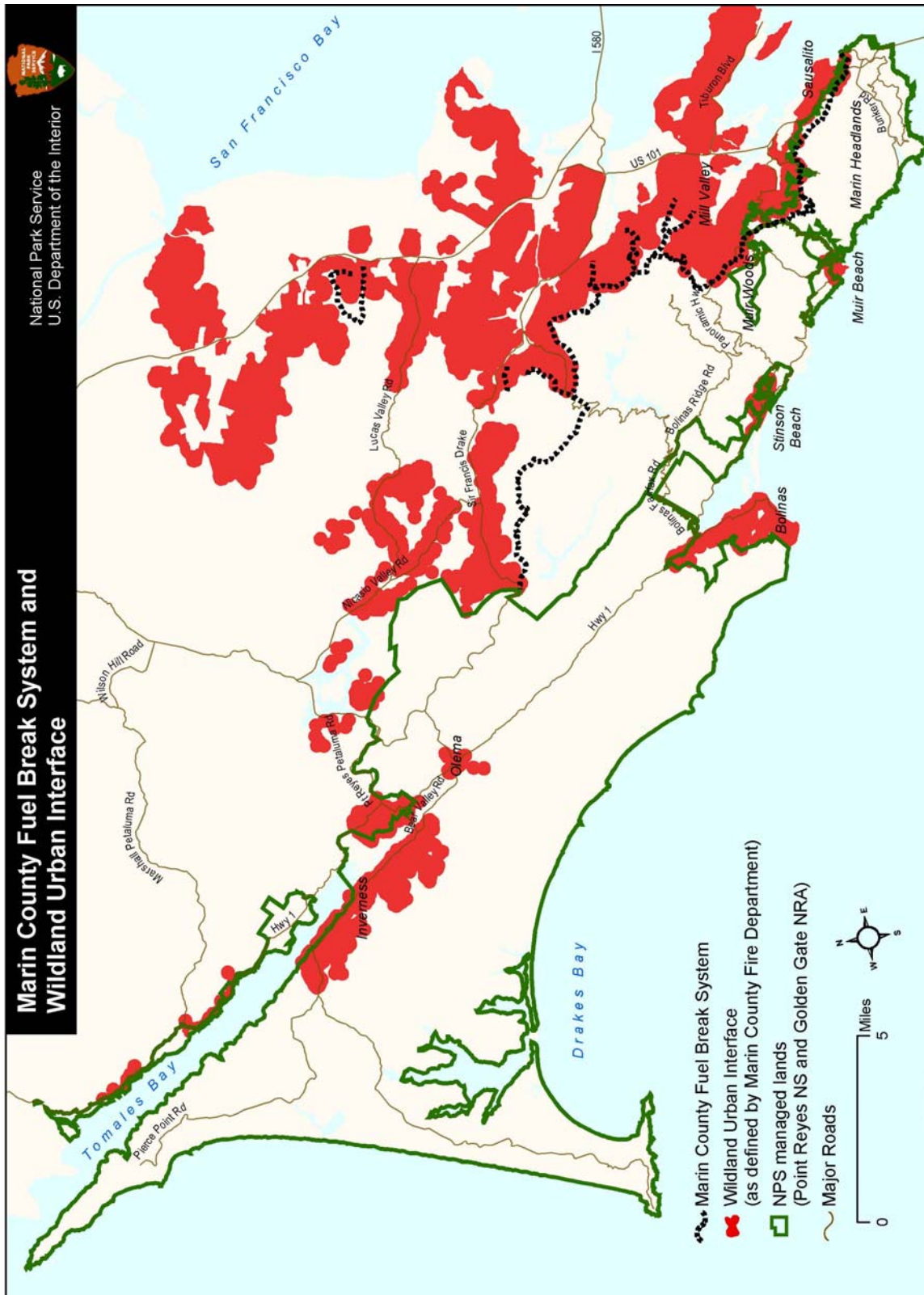


Table 1 – CWPP Fuelbreak Sections on GGNRA Lands

Fuelbreak Section	Description	Length (miles)	Miles Completed	Percent Complete
Sausalito	Shore of SF Bay over Waldo Tunnel to Alta Ave Fire Rd	2.3 mi	0	0%
Marin City	Alta Ave Fire Road to Tennessee Valley Rd	1.3	0.6	50%
Tamalpais Valley	Tennessee Valley Rd to 3 Corners (intersection of Highway 1 & Panoramic Hwy)	3.0	0.0	0%
Homestead Valley	3 Corners to Panoramic Highway to Mountain Home Inn	2.4	1.3	53%

Source: Marin Co. CWPP, 2006.

1.4.2 VEGETATION MANAGEMENT PLAN, PRESIDIO OF SAN FRANCISCO

The Vegetation Management Plan for the Presidio (VMP) (NPS 2001) was completed in 2001 as part of a collaborative planning effort between the NPS and the Presidio Trust for both Area A (under NPS management) and Area B (under Presidio Trust management) of the Presidio. The VMP addresses all vegetation resources and contains policies and actions that guide fire management activities as well as natural resources management activities, including efforts to test the efficacy, through research, of using fire to enhance and/or manage threatened and endangered plant species. Prescribed burns for resource benefit and fuel reduction projects in Area A or performed by NPS staff in Area B should conform to the resource objectives of the VMP and this FMP, meet any requirements for Section 7 consultations where habitat of listed plants is involved and be coordinated with the Presidio Trust.

1.4.3 Mt. Tamalpais Area Vegetation Management Plan

The Mt. Tamalpais Area Vegetation Management Plan (MTVMP), prepared in 1995, presents strategies for managing vegetation on the 19,000+ acres owned by the Marin Municipal Water District (MMWD) and an adjacent 1,150 acres owned by the Marin County Open Space District (MCOSD). The plan provides specific recommendations for reducing the risk of impacts from wildland fire and enhancing biodiversity, both primary goals of the plan. GGNRA lands are present in both MMWD watersheds (West Marin and Mt. Tamalpais) and have common boundaries with MMWD holdings. All jurisdictions in the MTVMP area face many of the same resource challenges such as high fuel accumulation, a complex and lengthy urban wildland interface, and the spread of highly flammable, nonnative plant species within the interface. Addressing the issues incrementally within each jurisdiction contributes to the overall success in combating these challenges.

The MTVMP called for a network of fuel breaks to help firefighters contain wildfires; both the MMWD and MCOSD have signed on as partners to the CWPP and its proposed fuelbreak system. The MTVMP also calls for prescribed burning of 100 to 200 acres per year (less than one percent of watershed land) to control nonnative plants, reduce fuels, and maintain natural habitats.

The FMP Final EIS anticipated that the NPS would continue to provide staff support and, when available, financial support, through the federal WUI funding program to support MTVMP projects. To qualify for federal funding under the National Fire Plan, projects should be included in the CWPP for that jurisdiction. Projects are selected by the California Fire Marshall following interagency consultation. The NPS would continue to seek opportunities to work cooperatively on projects with both agencies.

1.4.4 POINT REYES NATIONAL SEASHORE FIRE MANAGEMENT PLAN

The NEPA process for the PRNS FMP concluded with the signing of the ROD on 10/29/04. The Operational Strategy for the FMP describes the process PRNS will use in implementing the selected alternative in conformance with the commitments for environmental protection made in the ROD. The 18,000 acres of GGNRA lands included in the PRNS FMP are under the direct administration of PRNS through an agreement between the two parks. The alternative selected for implementation allows up to 2,000 acres of prescribed burning and 1,500 acres of mechanical treatment annually within the park. With the exception of smaller research burns, prescribed burning would not occur within the area currently leased for agriculture.

The GGNRA and PRNS FMPs share the same goals and a common boundary. The planning areas of the PRNS and GGNRA FMPs adjoin each other at the Bolinas–Fairfax Road, with PRNS managing lands north of the road and GGNRA managing lands to the south. In reference to this interface, the PRNS FMP states that “Prescribed burning in the southernmost portion of the ridge [Bolin Ridge] in coastal chaparral and mixed scrub habitats would also help achieve a natural resource benefit by simulative reproduction in the rare, fire adapted species Marin manzanita and Mason’s ceanothus” (NPS 2004). To the greatest extent possible, the San Francisco Bay Area Parks Network will work cooperatively to develop projects that address resource challenges common to the network parks and promote an efficiency of scale through joint staffing and/or funding of projects. The parks share a prescribed fire specialist position, duty stationed at PORE but serving both parks by developing a yearly program of work that includes prescribed fire and fuels planning, as well as project implementation

1.4.5 Cal Fire California Fire Plan

The California Department of Forestry and Fire Protection (Cal Fire) published the California Fire Plan (CFP) covering State Areas of Responsibility in July 2004. The goal of the CFP is the reduction of wildfire costs and losses through the protection of assets at risk by executing strategically sited vegetation management projects and a public education program stressing the homeowners responsibility to provide defensible space and use “fire safe” building materials. The implementation strategy of the CFP proposes:

- √ Creation of local forums to determine what the fire problem is through input from citizens, community groups, local agencies and other stakeholders.
- √ Identification of assets at risk, enabling the stakeholder forums and the Unit to set priorities for vegetation management project work. These assets include

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citizen and firefighter safety, structures, watersheds, wildlife and habitat, timber or unique areas of cultural or historic significance, and air quality.

- √ Development of wildfire protection zones through vegetation management projects that reduce the potential for large damaging wildland fires.
- √ Development and implementation of vegetation management projects cooperatively with stakeholder forums. Projects may include a combination of mechanical clearing or prescribed fire.

1.4.5.1 Cal Fire, San Mateo/Santa Cruz Unit

Cal Fire adopted a Fire Management Plan for its San Mateo/Santa Cruz unit in 2004 (<http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf136.pdf>). There is no mention of federal land management in the Plan nor are any of the individual national park units referred to or mapped. Battalion 1, consisting of Belmont Fire Station and Cordilleras Fire Station is responsible for the northern portion of San Mateo County including open space lands near Pacifica and the San Francisco Watershed lands adjacent to Sweeney Ridge. Battalion 5 serves the San Mateo portion of the Skyline Corridor with Fire Stations at Skylonda and Saratoga Summit.

GGNRA is in negotiation with Cal Fire with the objective of having that agency agree to accept GGNRA San Mateo lands as part of their Direct Protection Area (DPA). In conformance with the Master Cooperative Wildland Fire Management and Stafford Act Response Agreement between the State of California and federal land management agencies, the NPS would relinquish fire protection responsibilities to Cal Fire. As a result of turning over DPA responsibilities, the NPS would have only limited control over suppression actions at the time of a fire and would need to insert special resource protection instructions into the unit's Annual Operating Plan each April.

1.4.6 San Francisco Co., Recreation & Park Dept., Parks & Significant Natural Areas Program

The San Francisco Recreation and Park Department is responsible for managing the City's parks and "significant natural areas." The Natural Areas Management Plan was adopted in 1995 and the program staffed in 1997. It is a community-based habitat restoration program. San Francisco parks and natural areas adjacent to GGNRA lands include:

- Balboa Natural Area (1.8 acres) west of Sutro Heights and east across the Great Highway from Ocean Beach and the Cliff House,
- Lake Merced Park, east of Fort Funston, which has natural area designation for nearly half of its total acreage (395 acres out of a total of 814 acres),
- Mountain Lake Park, near Lake Street south of the Presidio is primarily within the jurisdiction of the Presidio Trust (13.1 of a total of the total 14.2 acres), includes a 1.1 acre section managed by City Recreation and Parks, and
- Sharp Park Golf Course in Pacifica bordered to the southwest by Mori Point and to the southeast and east by Sweeney Ridge. More than half of the golf course

lands (237.2 acres of the total 411 acres) are designated as a significant natural area.

Sharp Park is unique in the City's Significant Natural Areas Program in that it supports habitat for the federally-listed "endangered" San Francisco garter snake and "threatened" California red-legged frog; the common yellowthroat and the San Francisco fork-tailed damselfly, a federal bird of conservation concern; and possibly the bumblebee scarab beetle, a federal species of concern. Historic records indicate the park once supported the federally endangered Mission Blue Butterfly and the federally threatened Bay Checkerspot Butterfly.

Prescribed burning is included as a strategy for controlling the spread of nonnative plant species and encouraging the germination of native species in the San Francisco Recreation and Park Department's County Natural Areas Program (NAP). A principal management policy of the NAP is providing fire breaks where appropriate and maximizing indigenous vegetation for fire control. The management plan for Sharp Park calls for significant reduction in the cypress and eucalyptus stands on the eastern side of the park adjacent to Sweeney Ridge. There are opportunities here for GGNRA to work with City of San Francisco staff to reduce the expansion of and thin the density of existing groves along the common boundary.

1.4.7 San Francisco Peninsula Watershed Management Plan

The 23,000-acre San Francisco Peninsula Watershed, managed by the San Francisco Public Utilities Commission (SFPUC), shares a boundary with Sweeney Ridge on the north and the Phleger Estate on the south. The watershed lands are designated as a Hazardous Fire Area by the Cal Fire. As such, the area is subject to closure by the SFPUC, as necessary or as requested by Cal Fire, during times of high fire danger. A secondary goal of the Peninsula Watershed Management Plan (SFPUC 2002) is reducing the risk of wildland fire and potential adverse effects to the watershed, adjacent urban areas, and the public. Fire in the watershed would not only place nearby populated urban areas at risk but could also affect water quality, water supply to contract jurisdictions, and ecological and cultural resources within or near the watershed. A primary reason that the public has had restricted access to the watershed lands is to reduce the potential for the deliberate or accidental start of a wildland fire. Watershed Management Plan Policies call for the increased protection of watershed resources through the improvement of firefighting facilities and implementation of a fire management plan for the watershed.

In implementing the GGNRA FMP, the NPS will coordinate with the SFPUC Land and Resources Management Section to ensure that NPS actions conform to the Watershed Management Plan and FMP to the extent possible that allows NPS to its objectives. GGNRA staff meets annually with the SFPUC Land and Resources Management Section to discuss issues of joint interest and will inform SFPUC staff of proposed fire management actions at the Phleger Estate and Sweeney Ridge.

1.4.8 San Mateo County Parks and Recreation Department Documents

GGNRA shares common boundaries with two large parks managed by the San Mateo County Parks and Recreation Division of the Environmental Services Agency – San Pedro County Park and Huddart County Park.

The 974-acre Huddart County Park is on the southern boundary of Phleger Estate near the Town of Woodside in southern San Mateo County. Most visitors to Phleger park their cars in Huddart Park and hike in to Phleger on the connecting trail network. Huddart has similar vegetation community composition as is found in Phleger including redwood forest, mixed evergreen forest, oak woodlands and chaparral. Huddart itself is bordered to the west by Purissima Open Space Preserve and to the south by Teague Hill Open Space Preserve.

San Pedro Valley Park, south of Sweeney Ridge in Pacifica, encompasses 1,150 acres of coastal scrub, grasslands and riparian habitat that includes the middle and south forks of San Pedro Creek, which provides habitat for the federally threatened steelhead.

1.4.8.1 *Decision-Making Guidelines for Vegetation Management*

San Mateo County Parks recently completed this operational manual which presents clear and consistent guidelines and procedures for park staff to follow in conducting vegetation management activities and provides tools for selecting and prioritizing future vegetation management projects. The June 2006 document describes current fire management actions at County parks as limited to routine actions in and around developed areas of the parks using mowing, trimming overhead branches near fireplaces and herbicide use along fences, parking lots and to reduce non-native plants and poison oak.

The Guidelines recommend that County Parks come into compliance with Cal Fire requirements for a 100-foot wide fuel reduction zone between wildlands and developed areas. To meet with this requirement, the Guidelines recommend that parks with tracts of natural lands create and maintain the zone of reduced fuels on the parks' perimeters. Where the fuel reduction zone crosses forested areas, maintenance would be needed to treat small diameter trees and understory brush (pp. 46 and 74). Appendix A of the Guidelines contains the Department's procedures for conducting prescribed burns, flaming invasive non-native plants, grazing used for vegetation management, pile burning and establishing fuel breaks.

1.4.8.2 *Huddart and Wunderlich County Parks Draft Master Plan*

Released in May 2006, the draft plan includes a chapter prepared by Carol Rice of Wildland Resource Associates, dedicated to the reduction of risk of wildland fire in these two parks. Recommendations for Huddart Park, adjacent to the Phleger Estate include:

- Mowing grass to create 30-foot wide buffers along roads, park boundaries, parking and picnic areas and other areas with ignition potential.
- Restricting parking and vehicle use to paved surfaces.

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- Closing trails on Red Flag Days.
- Removing dead, downed material from roadsides, thinning forest understory and small diameter trees to create a vertical separation between the ground and canopy, thinning shrubs to form isolated groupings, and removing taller shrubs near trees.
- Providing a 100-foot radius of defensible space around structures by mowing, pruning, and removing flammable material from roofs, decks, and propane tanks.
- For newly landscaped areas, planting fire-resistant plants in groupings isolated by hardscape or mowed grass.
- Removing pyrophytic invasive, exotic plants and restoring habitat with less flammable native plants.
- Using goat and horse grazing to reduce fuels where appropriate.
- Assess hydrant siting, water pressure and volume and identify any needed improvements.
- Evaluate exterior construction features (e.g. roofing, siding) for ignition resistant construction.
- Improving the hairpin turn on Richards Rd. at McGarvey Gulch in Huddart Park to meet standards for Cal Fire and Woodside Fire Protection District vehicle weight and turning radii.
- Installing safety zones to make it safer for firefighters in order to increase the likelihood fire suppression resources will be committed to that location

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