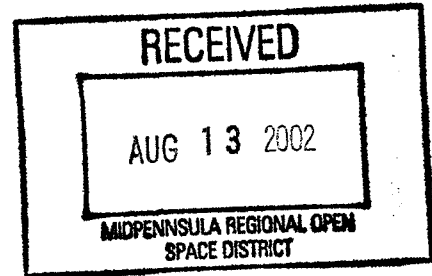


LA HONDA FIRE BRIGADE

8945 Hwy 84 • P.O. Box 97 • La Honda • California • 94020
Business Phone (650) 747-0381 • Fax (650) 747-0763

August 9, 2002

Ms. Cathy Woodbury
Planning Manager
Midpeninsula Open Space District
330 Distel Circle
Los Altos, CA 94022-1404



Re: San Mateo Coastal Annexation
Environmental Impact Report

Dear Ms. Woodbury:

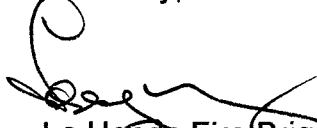
Enclosed please find the La Honda Fire Brigade's comments concerning the above referenced report. The La Honda Fire Brigade provides, as a part of the San Mateo County Fire Department, emergency services to La Honda and the surrounding area. As such, the Districts expansion to the San Mateo County South Coast will have an effect on our organization, and the service we provide to the public.

Our response is in accordance with a resolution of our board of directors approving it's sending. We reserve the right to modify our response for any reason should our board deem it appropriate, during the comment period.

After the District reviews our response, we will be pleased to answer any questions that may come about. Communications on this matter should be directed to the undersigned.

Thank you for the opportunity to make our thoughts known.

Sincerely,



La Honda Fire Brigade Inc.
Larry Whitney
Volunteer Chief

Midpeninsula Regional Open Space District

San Mateo
Coastal Annexation

Draft Environmental Impact Report

Response

August 1, 2002

La Honda Fire Brigade Inc.

8945 La Honda Rd. P.O. Box 97
La Honda CA 94020
650-747-0381. fax 650-691-0485

www.Lahondafire.org

Response to Midpeninsula Open Space District
Draft EIR by La Honda Fire Brigade Inc. August 1, 2002

Introduction:

Since 1953, the La Honda Fire Brigade (Brigade) and its predecessor the La Honda Canyon Society, has provided community services to the unincorporated town of La Honda. Today the Brigade counts 250 local households as members of our association. Starting in approximately 1965 this non-profit corporation commenced providing fire suppression services to the area and today is a part of the San Mateo County Fire Department (County Fire). The Brigades role is that of a Volunteer "Multi-Risk" Fire Company providing first due Structure and Wildland Fire Suppression, Rescue, Haz Mat and BLS Emergency Medical response to an approximately 56 square mile area of this county. The Brigade's response zone includes Hwy 84, from Hwy 35 to Hwy 1 and Alpine Rd. to Portola State Park Rd. There are approximately 1,583 permanent residents living here as well as several government institutions.

The purpose of this response is to set forth what we believe the impact of the Mid Peninsula Regional Open Space District's (District) planned Coastal Annexation may be on the Brigade and the service it provides. Our comments are based on the District's provided Draft Environmental Impact Report dated June 2002.

Issues:

Tax Loss as a result lands purchased for open space:

The District's EIR acknowledges that property acquired by the District as part of its Coastal Annexation, will result in a net reduction in the property tax base of San Mateo County. In addition to lands purchased directly by the District, other land trusts and non-profit organizations are purchasing or have purchased large parcels on the South Coast. The cumulative effect of these open space purchases will be a reduction in the tax base available to fund public services such as County Fire.

The Brigade's Volunteer Fire Company relies heavily on County Fire tax dollars for both capital equipment and operating costs. A reduction in tax base could result in a reduction of funds available to our program. This would result in a decrease in the level of service we provide, a matter of great concern to the community and our organization.

The EIR does attempt to quantify the dollars various agencies would lose based on certain assumptions. The Tax Revenue Estimation Methodology used in the EIR primarily reflects the loss of Tax Base as a result of private land purchased directly by the District.

We believe a better way to gauge the effect of open space expansion and the District's effects on public services would be to include the loss in Tax Base from:

- a) The sale of Private Land directly to the District.
- b) The sale of private land to other open space organizations (both recent and anticipated purchases) that the District may either have a relationship or partnership with.
- c) The estimated loss of Tax Base resulting from the failure of the County to reap the effects of a re-appraisal of the properties based on the new sale price in a private owner to private owner sale.
- d) The estimated loss of Tax Base as a result of some percentage of the properties being sold that would have otherwise been developed with property tax increasing improvements.

We ask the District to re-estimate the loss of tax base to the County. It should then develop a plan to compensate the County Fire program for its loss of tax dollars as a result of annexation.

Wildfire Threat:

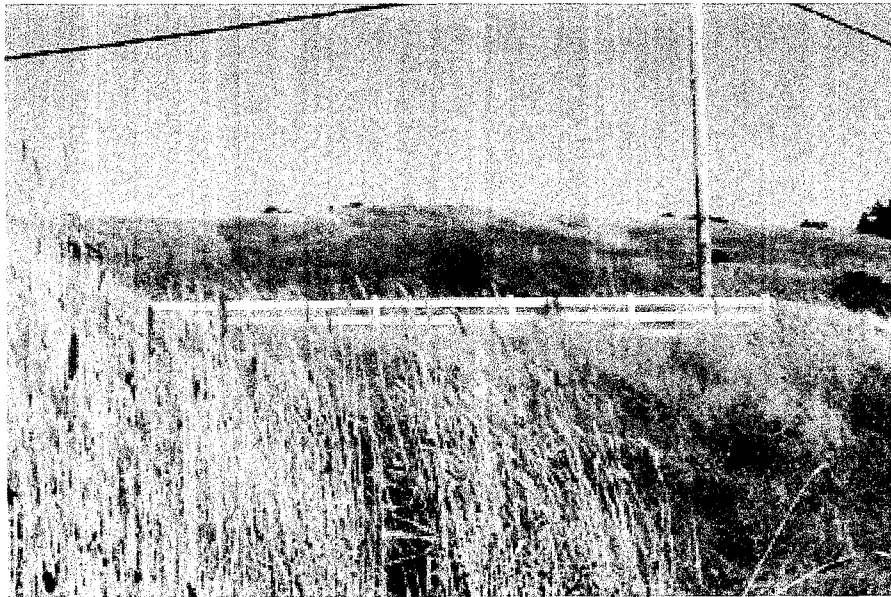
Over the last decade the San Mateo County South Coast, with two notable exceptions, has been virtually free of any sort of Wildland Fire. The combination of limited public access, especially in grassland areas, and the lands historical agricultural and grazing uses have help kept vast portions of the South Coast free from Wildfires.

The fire season on the South Coast tends to lag behind what is generally thought to be the most dangerous times of year in most parts of the state. Although a wildfire can start at any time of year, given the right set of circumstances, it's the typical fall weather patterns that pose the greatest threat. It has been during this period that most of the coasts large acreage fires (greater than five acres) have occurred. For the few fires that have occurred most have been after the close of the state budgeted fire season when the California Department of Forestry (CDF) is at its minimum staffing level.

With the Districts expansion comes a change in the formula that has helped protect this area. On lands that the District already owns within our response area there are now large tracts of grass that, in the summer and fall can easily ignite and rapidly carry fire. The introduction of people into such an area will clearly increase the possibility of ignition. It is important to note that the two largest Wildland Fires, both greater than twenty acres (1), which have occurred in this area over the last six years, have been on District lands.

We would recommend that the following be considered as mitigation measures for this increased threat:

- a) In addition to the measures listed in the EIR the District should consult with the CDF to develop a comprehensive program to minimize the effects of a Wildfire and to protect the South Coasts residential communities. The program should specifically address fuels modification around the perimeter of all lands acquired by the District. The purpose of this would be to hold wildfires originating on District Lands to District Land.
- b) Develop to CDF and the County Fire Marshals recommendations firefighting water supplies for all remote areas.
- c) Provide for reasonable deployment of Public Telephones (there is no cellular telephone service through out most of the South Coast) for prompt notification of fire emergencies
- d) We would highly encourage the District to equip County Fire with two four-wheel drive Type 3 Fire Engines. We recommend that these Engines be positioned at the County Fire Station in Pescadero and at the La Honda Volunteer Fire Station. These two engines would be available for service year around without regard to the state fire season or the draw down of state resources.



District lands adjacent to Highway 84
La Honda Creek Open Space Preserve

Increase in Volume and Complexity of Calls:

Perhaps the greatest burden that the District's annexation poses to the fire service will be an increase in EMS and Rescue call volume. Both County Fire and more specifically the Brigade's Volunteer Company have seen substantial growth in call volume over the last decade. Last year was an all time high for the Brigade which responded to 271 calls. Approximately eighty percent of these calls were to aid people who do not maintain a residence in the local community. The prospect for increased call volume even without the District's annexation is quite high.

To predict the number of calls that the District's Annexation might bring to this area, we consulted with the King's Mountain Volunteer Fire Brigade (KMFB), who does track calls generated on District lands within their response area. Over the ten year period from 1992 to 2001 emergency calls generated on District property amounted to just under nine percent of KMFB's total call volume.

EMS and Rescue calls generated on open space lands tend to be more complex than comparable calls occurring on a roadway or at a specific address. Locating and accessing victims can at times be difficult and time consuming. KMFB'S District responses take on average 79 minutes some 34 minutes longer than our current average EMS call.

A second concern of this increase in call volume is the draw down on Advance Life Support Engine Companies (ALS Engine). Whenever there is an EMS call within the Brigades response area one of the Brigade's BLS Engines or Rescue and a County Fire ALS Engine is dispatched. In accordance with the San Mateo County EMS plan and County Fire protocols, when a County Fire ALS Engine is dispatched it's station must be back filled by a cover ALS Engine. This creates a ripple effect of "move up and covers". For the area west of La Honda it takes 3 ALS Engines to fill this need, in the area to the east it takes two. Based on today's call volume most of these cover assignments are fill by existing County Fire resources.

With the District's expansion the propensity of more than one call occurring at a time will increase. As it does the need to draw ALS Engines from progressively further away stations will increase.

The EIR addresses a portion of the access problem by stating that helicopters can be used in some instances to remove a victim. It is important to remember that local air ambulance helicopters can only be used on clear days and nights. Even now, it is all too common for an air ambulance be requested and they are not able to arrive as a result of fog or other weather conditions.

As mitigation for the above we recommend:

- a) The District re-address the entire issue of the annexations impact on the call volume of County Fire Volunteer and Career resources.
- b) That upon the completion of this re-assessment that the District provide the necessary funds to County Fire, to off set the impact of this increase in responsibility.
- c) That the District assist the County with the development of a benefit plan for the Volunteer Companies within the annexation area. It is clearly in the public's, the District's, and the County's interest to maintain a strong and healthy Volunteer Fire Fighting force.

Impact on the Brigade:

Our all-volunteer Brigade depends upon the good will and generously of the community we serve. The community supports our mission by being involved and serving as Volunteer Firefighters, Neighborhood Emergency Service Team Members, or joining our Board of Directors. Its support is financial as well. We receive direct contributions from our dues paying members and through donations. We receive indirect dollars from the community's support of our many fund raising events. (Pancake Breakfasts, Crab Cioppino Dinner etc.)

The impact of the Districts expansion will mean there will be fewer private property owners in our response area. It is private property owners especially owners of large amounts of acreage that have a vested interest in our fire departments success. Reducing their ranks will have a direct effect on our ability to raise funds.

To mitigate this effect we ask:

- a) That the District itself becomes a dues paying member of our organization. We would suggest that the District take out a membership for each parcel it acquires just as we would ask of a private property owner.
- b) The District should make every effort to maintain the housing stock in this area. As properties are acquired the existing homes should be re- rented as soon as possible and maintained in a habitable condition.
- c) Whenever housing surplus to the Districts own needs becomes available, a plan to prioritize renting such to public service employees based in the area should be established. Priority should be given to existing Volunteer or Career Firefighters, Law Enforcement Personnel and Teachers.

- (1) Largest Wildland Fire within CDF/County Fire Battalion Five
1995-2001
Incident # CZU-3902, Apx. 20 acres, Nov.23, 1995
Incident # CZU-6430, Apx. 54 acres, Oct. 14, 2001

