

**CLAREMONT CANYON CONSERVANCY COMMENTS ON THE DRAFT OAKLAND
VEGETATION MANAGEMENT PLAN
June 8, 2018**

The Claremont Canyon Conservancy is a 501(c)(3) membership organization whose members mostly reside in or near Claremont Canyon in the East Bay Hills. The Conservancy was established in the aftermath of the 1991 “Tunnel Fire”, which destroyed or threatened many of its members’ homes. The Conservancy is focused primarily on protecting and enhancing the environmental values of Claremont Canyon. We work to protect native plant species, remove invasive ones, build and maintain trails and make the Canyon more fire safe.

The Conservancy was represented at the May 22nd public meeting by our Vice President Jon Kaufman, who made the following summary comments:

- The discussion of the eucalyptus fire hazard is excellent.
- The discussion of herbicide use is also excellent.
- In that light, it is curious that the Draft Plan emphasizes thinning rather than removal of eucalyptus especially in damaged stands in high-risk locations.
- Thinning does not work in critical areas and where it does it requires annual ongoing maintenance which the City cannot afford.
- We expect other effective options to be analyzed.
- The Draft Plan should be guided by fire and resource science, and not mythology or political expedience.
- The Draft Plan is welcomed by the Conservancy, and we wish it had been prepared five years ago.

The Conservancy also submits the following summary statements about both the Draft Oakland Vegetation Plan (Plan), and about ongoing agency efforts to mitigate fire hazards in the East Bay Hills (Hills).

1. The Draft Plan should provide a summary that includes the fire mitigation science and resource management science used by the consultant team in developing the Plan combined with a summary of the lessons learned during the 1923 Berkeley Fire, the 1970 Fish Ranch Road Fire, the 1991 Oakland Tunnel Fire, and the recent Tubbs and siege fires of Sonoma County.
2. The Draft Plan should describe what happened during the 1991 Tunnel Fire in a carefully written “official” narrative that will eliminate ongoing public confusion about how 1,520 acres of the Tunnel Intermix burned and why all Oakland city parks and other public and private lands in intermix areas must be managed to reduce the risk of similar fires. The only existing analysis reported that 43% of the acres were residential areas with dense landscapes, 31% of the acres were planted eucalyptus and pine forests, and 26% of the acres were unmaintained “natural” hill vegetation. (See point five below)

3. The Draft Plan should describe how recommended fire projects in the Plan will address future fire risks associated with global warming, extreme weather, and the new normal for more fires often described by Cal Fire Chief Pimlott, NOAA, numerous scientific publications, and in the media.
4. The Draft Plan should describe why Oakland and East Bay Hill fires are different than the fires in Southern California, the fires in forested areas of the Sierra, and why fire mitigation efforts must be site and vegetation specific to address this areas development and vegetation history that has contributed to recognized fire hazards in Hills.
5. The Draft Plan is based on fire behavior modeling that we find useful in understanding the relative differences in park vegetation flame lengths at the fire front of 0-4', 4-8', 8-11', 11-20', and above 20' followed by three levels of possible crown fire behavior. However, the Draft Plan should explain how these projected flame lengths relate to flames that are commonly seen that are 2 to 3 times the height of tall trees with embers expanding the fire area across valleys and ridges during a major fire. The flame front is important but planning and fuel management projects to limit the area of fire is critical at the urban/wildland intermix.
6. The Draft Plan should describe how embers from vegetation and residences in the 1991 fire spread fire up to 1/2 mile downwind and downhill into unprepared residential areas and public lands, along with recommendations about what must be done on city parklands to deal with the probability of burning embers in future Hill fires. Clearly, tall Monterey pine and Blue gum eucalyptus in both residential areas and along the cities Grizzly Open Space ridge produced the vast majority of embers that quickly expanded the fire making it impossible to control during the initial breakout period. In our opinion, both pine and eucalyptus trees should be removed along city hillsides and high-ridge areas above homes to be replacement by lower growing oaks and other manageable native vegetation. (see Attachment A)
7. The Draft Plan should address how it will resolve hotly debated controversial issues during earlier plans, including:
 - The number of trees to be removed during forest thinning treatments.
 - The differences in a clear cut and selective thinning for safety and tree health.
 - The differences in relative fire risks between planted trees (eucalyptus and pine) and native vegetation (oaks, willows and bays).
 - The safe use of herbicides.
 - The impacts of SOD in oaks, and how insect pests and pathogens impact eucalyptus and pine.
 - The false claim that it is not necessary to mitigate fire hazards and to accept the fact that fires are a part of living in the Hills.

- The desire for a “species neutral” approach that would result in little impact to the environment or the public.
 - The need to move quickly in mitigating Oakland Hill fire hazards because we are due for another fire and fires are now a year-round threat.
8. The Draft Plan should include a summary with specific information about the vegetation to be managed, at what cost, and at what environmental impact. Another 1,000-page plan without a clear summary will be not be useful to residents, the media, or to Oakland’s political leadership.
 9. The Draft Plan should explain how the Oakland Plan relates to the 1995 Hills Emergency Forum Joint Agency Plan, the 2010 Park District Plan/EIR, and the 2016 FEMA Plan/EIS.
 10. The Draft Plan should note that a comprehensive Environmental Impact Statement was prepared by FEMA that also covered Grizzly Peak Open Space and the Oakland Sports Complex Area. It should state that Oakland will explore the possibility of tiering off both the FEMA/EIS and its USFWS Biological Opinion for these two project areas saving both time, preserving options for project funding, and for obtaining required permits.
 11. The Draft Plan should focus on city lands and residential areas west of the high ridge giving early preference to fire mitigation projects in the high fire risk areas of the Strawberry/Claremont intermix and the Tunnel/Thornhill/Rockridge/Vicente intermix. Fire mitigation plans for these and other city intermix areas to the south (Joaquin Miller, Leona, Knowland, and Chabot) must be coordinated with planned firefighting strategies of the Oakland Fire Department which by state law is responsible for Local Responsibility Area (LRA) firefighting and fire code enforcement west of the ridge. (see Attachment B)
 12. The Draft Plan should note that fire hazard mitigation responsibility, for wild land vegetation management and ridge top interface fuel breaks east of the high ridge will be handled by agencies owning large areas of vegetation including the East Bay Regional Park District, UC Berkeley, and the East Bay Municipal Utility District. Fire mitigation projects must be coordinated with planned firefighting strategies of the Oakland Fire Department, and by Cal Fire which by state law is responsible for State Responsibility Area (SRA) firefighting and fire code enforcement east of the ridge.
 13. The Draft Plan currently implies that almost all city park vegetation will be managed in some fashion by the Fire Department. In the alternative, we believe the Draft Plan should zone priority fire mitigation efforts by using carefully designed fire management projects within numbered polygons while also identifying areas that do not require management or are necessary to preserve habitat for listed species. The computer-generated fire maps with 100’ and 300’ “fire impact

zones” and the listed species maps have not been integrated into simple maps that the public can understand for city parks and the city intermix areas noted in Attachment B. The complexity of the Draft Plan must be made simple and clear for the Fire Department, city staff, and the public.

14. The Draft Plan should describe how the city manages its parklands, and clarify the roles of Planning, Public Works, Parks and Recreation, Knowland Zoological Society, city tree crews, and the Fire Department in ongoing management and Plan implementation. The Draft Plan as currently written, assumes a level of land and resource management sophistication in the Fire Department that we believe does not currently exist. There are no licensed foresters or experienced restoration ecologists in the Fire Department that will be necessary for Plan implementation. The Draft Plan should note that city agencies are underfunded, and inadequately staffed and suggest recommendations for improvements necessary to ensure Plan implementation.
15. The Draft Plan should also identify and list which city agencies will be responsible for each polygon and include cost estimates with annual budget requirements and timetables for the first ten years of recommended project work.
16. The Draft Plan suggests that thinning of mature eucalyptus stands is a viable strategy for reducing fire hazards. The Draft Plan also must note that this strategy is unproven on ridgelines and steep hillsides above homes where tree canopies are impacted by Diablo winds periodically exceeding 40 mph. In our opinion, thinning of eucalyptus will not be effective in this environment. Thinning of pine forests in the Sierra and management of eucalyptus forests in Australia is also commonly combined with a program of regular prescribed burning which will not be possible in the Oakland Hills. Removal of highest-fire-risk trees in the Hills to reduce excessive fuels in city parks followed by treating eucalyptus stumps with an IPM approved herbicide is the only effective strategy here.
17. The Draft Plan should recommend removal of all second-growth eucalyptus trees, coppice suckers and seedlings in city parks and along evacuation roads allowing for the restoration of areas that were logged following the freeze of 1972 or burned during the 1991 fire. We specifically support removal of second-growth eucalyptus and pine seedlings at the Grizzly Peak Open Space and North Oakland Sports Field. So-called second-growth eucalyptus are from either the 1972 freeze logging (which left dense areas of 45-year old seedlings and coppice suckers on stumps with understory oaks and bays) or 25-year old coppice suckers on stumps when sucker bashing was unsuccessful after the 1991 fire. By removing the second-growth eucalyptus (which one could consider a selective form of thinning) the City can begin restoration of understory vegetation like what the University of California did at Signpost 29 along Claremont Ave on the south side of Claremont Canyon.

18. The Draft Plan should recommend removal of 20-year old Monterey Pine seedlings that were allowed to become established after the original pines burned and were killed in the 1991 fire and removed in a helicopter logging operation at a cost of \$1,000,000 along the steep hillsides of the Grizzly Peak Open Space and North Oakland Sports Field. The West side of Tunnel Canyon has been successfully managed by the Hiller Highlands Homeowner's association after the removal of an estimated 600 pine seedlings to create a managed oak/grassland hillside. The East side of Tunnel Canyon on both city and private land is another fire disaster waiting for an ignition with flammable pine seedlings and dense eucalyptus stands currently unmanaged. In our opinion, all pine and eucalyptus in Tunnel Canyon should be removed to release understory native vegetation. Eucalyptus and aging pine, cypress, and dense acacia trees should also be removed and replaced with redwoods and oaks in Shepherd Canyon Park and Joaquin Miller Park.
19. The Draft Plan should recommend the adoption of specific updated IPM policies and updated City policies that will allow appropriate and safe use of herbicides such as Garlon by trained and licensed employees, and by reliable and licensed contractors working on City vegetation management projects. Selective IPM approved herbicides can be used safely on stumps of newly felled eucalyptus with no danger of spread to other vegetation or cause harm to people, animals or wildlife.
20. The Draft Plan should provide for ongoing coordination with active environmental organizations whose members currently volunteer at city or regional parklands and have experience in vegetation management and resource protection, including the East Bay Chapter of the California Native Plant Society, the Golden Gate Chapter of Audubon, and existing volunteer and stewardship groups working in city parks like the Garber Park Stewards, Friends of Sausal Creek and others.
21. The Draft Plan should recognize the fact that no volunteer groups are currently involved with Oakland in managing its eucalyptus and pine forests. Apparently, volunteering to make pine and eucalyptus areas fire-safe and sustainable is not something that attracts organizations or individuals who are willing to participate in regular ongoing work projects to remove eucalyptus or pine seedlings in areas often intermixed with poison oak, to rake and remove tons of understory debris, or to remove invasive flammable vegetation below eucalyptus and pine trees.
22. The Conservancy's additional detailed comments, keyed to the Draft Plan, are being developed with the intent of meeting the 30-day, June 11, 2018 deadline. We also believe the City and its consultants should be willing to meet after the deadline with willing stakeholder groups like the Conservancy to discuss your reaction to our comments and the key remaining issues necessary to finalize the Draft Plan before the CEQA process begins.