



Response to UC Vegetative Fuel Management Initial Study
December 16, 2019

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The Conservancy is pleased to present this written response to the Initial Study to supplement the remarks our representatives presented at the scoping session on December 2nd.

We were pleased to learn that the Initial Study is not the complete plan that UC intends to make the subject of the environmental impact review. As was noted at the scoping meeting, the study is too vague and non-specific. As UC and its consultant develop the full plan, we urge that the following points be given careful consideration.

1. The plan prepared and submitted by Forestry Professor Emeritus Joe McBride (<http://www.claremontcanyon.org/fuel-management-proposal>) should be the basis of the UC Plan. It is comprehensive, it takes into account conditions created by global warming and it has the specifics necessary to make the Hill Campus as firesafe as possible while respecting the natural environment.
2. UC's plan should not be limited to the five projects noted in the Initial Study. Other areas of the Hill Campus require attention as well. If other areas are covered under separate approved plans, then those areas should be noted in this plan. For example, the area north of the East-West Fuel Break Project is ignored in the Initial Study. The era of global warming has created new conditions on the ground that must be considered. While this area is below the ridgeline, it is not out of danger. With hot winds in excess of 40 or 50 miles per hour occurring with greater frequency, flames originating in this area could reach canopies, ignite embers and blow great distances just like those on ridgelines.
3. As an institution of higher learning, UC's vegetation management plan must respect science and correctly apply it. It must avoid programs that respond to popular opinion but are not based on sound science. One such program is thinning. Thinning is a tool that foresters use in rural areas to ensure that trees grown for timber are given the room they require to grow straight and tall to maximize the harvest. This is not the goal of programs designed to limit wildfire in the wildland urban interface. Thinning is not a "compromise" solution. Thinning in the Hill Campus will leave fire-prone eucalyptus trees in place to cause the spread of future fires. Thinning would require extensive and expensive ongoing

maintenance and prevent more firesafe vegetation from growing. The safest and most financially viable option is to completely remove the dense eucalyptus groves.

4. UC has successful experience with complete removal rather than thinning in the Hill Campus in the area southeast of Claremont Avenue at Signpost 29. This area is not designated for treatment in the Initial Study because it was successfully treated years ago by the University and was maintained thereafter to the extent necessary. There the eucalyptus trees were felled, the stumps treated safely with very limited application of triclopyr and new sprouts were eliminated thereafter. With the exception of some redwoods planted by forestry students, no new vegetation was planted. More fire-safe native trees and brush replaced the fire-prone vegetation in short order. Felled eucalyptus trunks can be either chipped and used as fuel or spread out where they quickly decompose or they can be used as roadside barriers.
5. Maintenance is critical. Once an initial treatment has been completed, ongoing work is necessary to prevent the land from returning to a state where fire-prone vegetation is again difficult to manage. A correctly designed treatment program, such as elimination and not mere thinning of eucalyptus, will enable a cost-effective and time-limited maintenance program.
6. Vegetation management along evacuation routes must be completed over a wide enough area to keep the routes safe in emergency situations. A hundred feet may be insufficient if trees beyond a 100-foot perimeter are tall enough to fall across a route. This is especially important if the trees are on the upslope side of a route.
7. The UC plan must include habitat for the threatened and likely to become endangered Alameda Whipsnake. While the goal is fire safety, the need to build and protect whipsnake habitat with the vegetation management program can and must be included.
8. The Initial Study outlines the correct use of the herbicide triclopyr. However, the study also mentions but does not discuss using glyphosate. If this latter chemical is not going to be applied, then that should either be so stated or preferably no mention of it should be made.

The Conservancy looks forward to reviewing and commenting on UC's plan prior to the preparation of the EIR so that the plan might benefit from our input before it becomes subject to an environmental review.