APPENDIX A

NOTICE OF PREPARATION, INITIAL STUDY, SCOPING COMMENTS





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Notice of Preparation of Draft Environmental Impact Report for the Wildfire Hazard Reduction and Resource Management Plan and Notice of Fourth Public Meeting and Scoping Session

Lead Agency/Applicant:

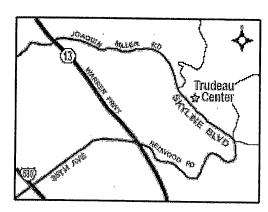
East Bay Regional Park District Brian Wiese, Chief of Planning and Stewardship 2950 Peralta Oaks Court Oakland, CA 94605-0381 Fax: (510) 635-3478

Consultant:

LSA Associates, Inc. Judith Malamut, Project Manager 2215 Fifth Street Berkeley, CA 94710 Fax: (510) 540-7344

The East Bay Regional Park District (EBRPD) will be the Lead Agency for and will prepare an Environmental Impact Report (EIR) for the Wildfire Hazard Reduction and Resource Management Plan (Plan), as described below, in compliance with the California Environmental Quality Act (CEQA). EBRPD needs to know your views as to the scope and content of the environmental information that is germane to statutory responsibilities in connection with the proposed project. The project description, location, and preliminary EIR scope are included with this notice; a copy of an Initial Study Environmental Checklist prepared for this project is available for review at EBRPD headquarters, Planning & Stewardship Department (510-544-2300), or may be downloaded from EBRPD's web site: www.ebparks.org/stewardship/fireplan.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 5 p.m. on May 22, 2008, 30 days after this Notice of Preparation is posted with the State Clearinghouse in the Office of Planning and Research. Comments on the proposed scope of the EIR may be sent by mail or fax to Brian Wiese (at the address above), or comments may be submitted at the fourth project meeting and scoping session scheduled for Wednesday, May 7, 2008 at 7:00 p.m. at the Trudeau Center, 11500 Skyline Blvd., Oakland (three blocks north of Redwood Road).



Project Title: Wildfire Hazard Reduction and Resource Management Plan

Project Location: The Study Area for the Plan consists of EBRPD park lands (approximately 19,000 acres) within the Measure CC zone in western Alameda and Contra Costa Counties. Bond Measure CC was passed in 2004 to provide funding for park maintenance, including the vegetation management and wildfire hazard reduction efforts undertaken for parks in this area. The 13 hillside parks within this zone, from north to south, are: Sobrante Ridge Regional Preserve; Kennedy Grove Regional Recreation Area; Wildcat Canyon Regional Park; Tilden Regional Park; Claremont Canyon Regional Preserve; Temescal Regional Recreation Area; Robert Sibley Volcanic Regional Preserve; Huckleberry Botanic Regional Preserve; Roberts Regional Recreation Area; Redwood Regional Park; Leona Canyon Regional Open

Board of Directors

Space Preserve; Anthony Chabot Regional Park; and Lake Chabot Regional Park. Seven shoreline parks are also included within the Study Area. From north to south, they are: Point Pinole Regional Shoreline; Miller/Knox Regional Shoreline; Brooks Island Regional Shoreline; Eastshore State Park; Middle Harbor Shoreline Park; Robert W. Crown Memorial State Beach; and Martin Luther King, Kr., Regional Shoreline. While the Study Area for the Plan includes the 13 hillside and 7 shoreline parks listed above, the primary focus of the Plan will be on the urban wildland interface (UWI) located at the western edge of the hillside parks and adjacent to the Point Pinole and Miller/Knox Regional Shorelines where high wildfire hazards and fuel loads are present. Figure 1 shows the project location.

Project Description: EBRPD is developing the Plan to guide ongoing vegetation management activities on EBRPD park lands along the UWI to reduce the likelihood of a catastrophic, wind-driven wildfire, such as the 1991 Oakland Hills Fire. EBRPD has determined that there are areas within its lands that are at high risk to produce or conduct a devastating wildfire, and that ongoing management is needed to reduce the risk of a fast-moving wildfire emerging from, or moving through, park lands and igniting residential neighborhoods and other structures and facilities within the UWI along these parks. Resource management considerations and best management practices (BMPs) for wildfire fuel reduction and vegetation management will be incorporated into the Plan to ensure that these activities are conducted in a manner consistent with protecting and enhancing environmental resources in EBRPD's park lands.

Specific goals have been established by EBRPD for the Plan and include the following:

- Reduce fire hazards on District-owned lands in the East Bay's UWI to an acceptable level of risk;
- Maintain and enhance ecological values for plant and wildlife habitat consistent with fire reduction goals;
- Preserve aesthetic landscape values for park users and neighboring communities; and
- Provide a vegetation management plan which is cost-effective to EBRPD on a continuous basis.

Scope of the EIR: The EIR will evaluate each of the environmental topics developed according to recommendations in the CEQA Guidelines, input from the lead agency and the consultant team, and the results of an Initial Study Environmental Checklist that was prepared for the project. Topics to be evaluated in the EIR include: Aesthetics; Air Quality; Biological Resources; Cultural Resources; Geology/Soils; Hazards and Hazardous Materials; Hydrology and Water Quality; and Noise.

Date: 4/16/08	Signature: Signature:
	Title: Chief, Planning and Stewardship

Reference: California Code of Regulations, Title 14 (CEQA Guidelines) Section 15082(a), 15103, 15375.

WILDFIRE HAZARD REDUCTION AND RESOURCE MANAGEMENT PLAN INITIAL STUDY

LSA

WILDFIRE HAZARD REDUCTION AND RESOURCE MANAGEMENT PLAN INITIAL STUDY

Submitted to:

East Bay Regional Park District 2950 Peralta Oaks Court Oakland, CA 94605-0381

Prepared by:

LSA Associates, Inc.
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510.540.7331
&
157 Park Place
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510.236.6810

LSA

WILDFIRE HAZARD REDUCTION AND RESOURCE MANAGEMENT PLAN INITIAL STUDY

A. SUMMARY INFORMATION

1. Project Title:

Wildfire Hazard Reduction and Resource Management Plan (Plan)

2. Lead Agency Name and Address:

East Bay Regional Park District (EBRPD or District) 2950 Peralta Oaks Court Oakland, CA 94605-0381

3. Contact Person and Phone Number:

Brian Wiese, Chief of Planning and Stewardship (510) 544-2321

4. Project Location:

The study area for the Wildfire Hazard Reduction and Resource Management Plan consists of EBRPD park lands (approximately 19,000 acres) within the Measure CC zone in western Alameda and Contra Costa Counties. Measure CC was the bond measure passed in 2004 that provided funding for the wildfire hazard reduction planning effort. The 13 hillside parks within this zone, from north to south, are: Sobrante Ridge Regional Preserve; Kennedy Grove Regional Recreation Area; Wildcat Canyon Regional Park; Tilden Regional Park; Claremont Canyon; Temescal Regional Recreation Area; Robert Sibley Volcanic Regional Preserve; Huckleberry Botanic Regional Preserve; Roberts Regional Recreational Area; Redwood Regional Park; Leona Canyon Regional Open Space and Preserve; Anthony Chabot Regional Park; and Lake Chabot Regional Park. The seven shoreline parks within the study area, from north to south, are: Point Pinole Regional Shoreline; Miller/Knox Regional Shoreline; Brooks Island Regional Shoreline; East Shore State Park; Middle Harbor Shoreline Park; Robert W. Crown Memorial State Beach; and Martin Luther King Jr. Regional Shoreline. The parks included in the study area are shown in Figure 1.

5. Plan Designation:

EBRPD has adopted specific land use development plans for the various parks under its jurisdiction. These land use plans identify land use designations, also known as unit designations, to indicate various levels of resource protection and recreational intensity associated with resources within the

parks. Land use designations include: Natural Units; Recreation/Staging Units; Special Protection Features; and Special Management Features. The Plan for which this Initial Study is being prepared will serve as a "system-wide" programmatic plan that includes activities and policies pertaining to a broader set of parks within EBRPD's jurisdiction; such activities may include managing vegetation, reducing wildfire risks, and protecting and managing wildlife corridors.

6. Zoning:

All of the parks are zoned to allow recreation and resource management uses.

7. Surrounding Land Uses and Setting:

The study area for the Plan includes the 13 EBRPD hillside parks and seven shoreline parks located in Contra Costa and Alameda Counties and listed previously. As shown in Figure 1, the hillside parks straddle the East Bay Hills in an elongated band of approximately 26 miles in length and up to 2.5 miles in width. Urban uses (primarily residential and institutional) are generally located along the western border of the parks; open space uses (such as lands owned and managed by the East Bay Municipal Utility District (EBMUD) and the University of California) are located to the east and north of the hillside parks. The shoreline parks are located along the San Francisco Bay within the City of Richmond in the north to Oakland in the south. The shoreline parks are generally more developed and managed for higher intensity recreational uses than the hillside parks, and the land uses adjacent to the shoreline parks are also more urban and built up and include industrial, office, commercial, and residential uses.

8. Other agencies whose approval may be required (e.g., permits, financing approval, or participation agreement.)

U.S. Fish and Wildlife Service
Federal Emergency Management Agency
California Department of Fish and Game
Bay Area Air Quality Management District
Regional Water Quality Control Board
San Francisco Bay Conservation and Development Commission
California State Historic Preservation Office
U.S. Army Corps of Engineers
University of California, Berkeley
East Bay Municipal Utility District

B. PROJECT DESCRIPTION

EBRPD is developing a long-range Wildfire Hazard Reduction and Resource Management Plan to guide ongoing vegetation management activities on EBRPD park lands along the urban-wildland interface to reduce the likelihood of a catastrophic, wind-driven wildfire, such as the 1991 Oakland Hills fire. EBRPD has determined that there are areas of high hazard fuels within the parks that have significant potential to produce or conduct a devastating wildfire, and action is needed to reduce the risk of a fast-moving wildland fire emerging from or moving through the parklands and igniting

residential neighborhoods and other structures and facilities adjacent to the parks. Similarly, the potential for fires starting on and moving from adjacent non-park lands and propagating through these high hazard fuels to cause unacceptable damage to EBRPD facilities and resources is great and warrants mitigation. Resource management considerations and best management practices (BMPs) to avoid or minimize environmental impacts will be incorporated into the Plan to ensure that fuel reduction treatment activities are carried out in a manner consistent with protecting environmental resources in the public parklands. While the study area for the Plan includes the 13 hillside parks and seven shoreline parks listed previously, the main focus of the Plan will be on the wildland-urban interface along the western edge of the East Bay hill parks and the shoreline parks of Point Pinole and Miller/Knox, where wildfire hazards and fuel loads are of great concern.

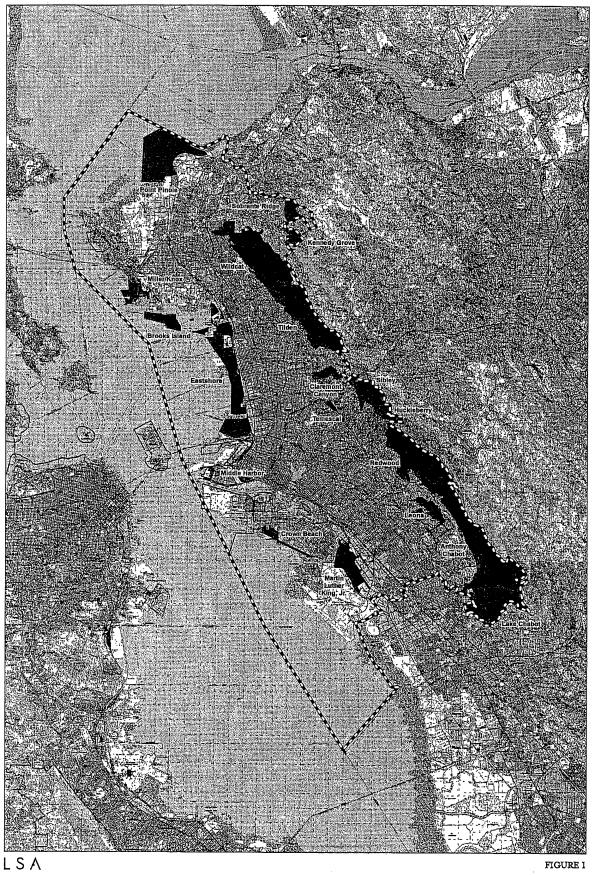
The objective of the Plan is to reduce the risk of a wildfire in identified high hazard areas through fuel reduction actions undertaken by EBRPD that are conducted in a manner that reduces adverse environmental effects and implements resource and habitat management goals. Specific goals that have been established by EBRPD for the Plan include the following:

- Reduce fire hazard on District-owned lands in the East Bay's UWI to an acceptable level of risk;
- Maintain and enhance ecological values for plant and wildlife habitat consistent with fire reduction goals;
- Preserve aesthetic landscape values for park users and neighboring communities; and
- Provide a vegetation management plan which is cost-effective to EBRPD on a continuous basis.

Actions that have been undertaken to date to inform the Plan include: describing and GIS mapping of the baseline environmental conditions within each park; identifying parklands and vegetation types with high wildfire hazards; evaluating the location and adequacy of EBRPD's existing fuel management areas; mapping potential fuel reduction treatment areas; and recommending fuel reduction methods and techniques, and identifying related resource considerations and best management practices (BMPs).

In addition to general policies and guidelines related to fire planning, the Plan will include the following elements:

- An introduction that describes the purpose, use of and need for the Plan, the history of East Bay wildfires, and the goals, objectives of the Plan.
- A description of fuel reduction methods that include: hand labor, mechanical treatment, chemical treatment, prescribed burning, grazing, and alternative methods. This Plan component will also describe considerations associated with implementing these treatment methods, including: the timing of the action, estimated costs, site condition constraints, performance standards; and BMPs to reduce adverse environmental effects. Implementation of the BMPs and performance standards will assist EBRPD in accomplishing successful fuel reduction and vegetation management projects that reduce wildfire hazards and achieve the highest environmental and public safety benefit for costs incurred.
- A vegetation management program that provides a blueprint for fuel management on District lands. This component of the Plan evaluates the following three major vegetation/fuel



STUDY AREA

East Bay Regional Park District

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Wildfire Hazard Reduction and Resource Management Flan

Study Area

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types for wildfire hazard conditions: Grasslands, Scrub, and Woodlands, and describes the primary resource values associated with each of these vegetation types; fuel reduction and resource enhancement goals; special considerations for treatment; potential treatment methods; and post-treatment performance standards. Implementation measures and guidelines will also be described including: pre-treatment surveys and reporting; preparation of fuel reduction action plans for individual treatment areas; and post-treatment maintenance, monitoring and record-keeping.

 Identification of potential treatment areas and strategic fire routes within each park and recommendations for specific fuel reduction projects and resource protection considerations for each area.

This Plan is a long-range programmatic document, and as such, site-specific conditions for the approximately 120 potential treatment areas totaling almost 3,000 acres can not be fully evaluated and identified within the framework of the Plan. However, the Plan will include a discussion of the environmental and resource values to be considered when identifying and implementing future fuel reduction management projects. These resource management considerations may not apply in all cases, but act as a general set of factors to evaluate for each treatment area based on the site-specific objectives and site conditions that will be identified prior to preparing a site-specific fuel reduction action plan. The Plan also will identify a process for ongoing feedback and incorporation of lessons learned from completed projects to enable EBRPD to adaptively manage their fuel reduction projects over time. By incorporating a feedback loop, the District will be able to create and implement increasingly successful and cost-effective projects as new information is learned about the effectiveness and long-term success of treatment techniques.

During the plan preparation process, EBRPD and consultant team have conducted a series of public meetings to inform agencies, stakeholders and interested members of the public of the progress on the Plan and CEQA assessment and to solicit public comment. The fourth meeting to be held in the spring of 2008 will also be a scoping meeting for the CEQA evaluation process.

C. DETERMINATION AND CHECKLIST

En	vironmental Factors Potentia	ally	Affected:		
The leas	e environmental factors checked st one impact that is a "Potential res.	belo ly S	ow would be potentially af ignificant Impact" as indic	fected ated b	by this project, involving at y the checklist on the followin
	Aesthetics Biological Resources		Agricultural Resources Cultural Resources Hydrology/Water Quality Noise Recreation Mandatory Findings of Significance		Air Quality Geology/Soils Land Use/Planning Population/Housing Transportation/Traffic
Det	termination. (To be completed b	by ti	ne Lead Agency.)		
On	the basis of this initial evaluation	n:			
a	I find that the proposed project NEGATIVE DECLARATION	t CC I wi!	OULD NOT have a signific	ant ef	fect on the environment, and a
	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.				
	I find that the proposed project ENVIRONMENTAL IMPACT	MΑ ΓRΙ	AY have a significant effec SPORT is required.	on th	e environment, and an
	I find that the proposed project significant unless mitigated" in adequately analyzed in an earli- been addressed by mitigation m sheets. An ENVIRONMENTA effects that remain to be address	npac er do neas L IN	t on the environment, but a pocument pursuant to applicate to based on the earlier and MPACT REPORT is required.	it leas able le alvsis	t one effect 1) has been egal standards, and 2) has as described on attached
3	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.				
	ature Brian Wiese	<u> </u>	Date	_4	1708
rinte	Chief, Planning	4	Stevardalip		

CHECKLIST

I.	AESTHETICS. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	a) Have a substantial adverse effect on a scenic vista?				
	b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				
	c) Substantially degrade the existing visual character or quality of the site and its surroundings?				
	d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				

a) Have a substantial adverse effect on a scenic vista?

Scenic views can be had both within and of the hillside and shoreline parks from many locations in the East Bay. Views of fuel reduction and vegetation management activities may be available from the public roads and highways that provide access to the parks. The potential that fuel reduction activities would have both substantial adverse and beneficial effects on views or scenic vistas will be addressed in the visual resources section of the EIR.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

The purpose of the Plan is to reduce wildfire hazards on EBRPD lands. There are no State scenic highways adjacent to the shoreline and hillside parks in the study area, and the vegetation management techniques would not directly affect rock outcroppings or historic buildings. However, the fuel reduction activities will affect trees, especially eucalyptus plantations. Therefore, the EIR will address whether implementation of the Plan would substantially damage scenic resources.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

The vegetation management activities to reduce fuel loads will be focused on the potential treatment areas that have been identified as part of the Plan. Changes in the type and density of vegetation in any particular location will occur as fuel loads and fire hazards are reduced. Whether these activities would substantially degrade the existing visual character and quality of the study area parks and their surroundings will be evaluated in the EIR.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The Plan does not include the construction or creation of any new structures or facilities that would contribute to a new source of light or glare.

			Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
п.	im car Ca Mo	GRICULTURAL RESOURCES. In determining whether pacts to agricultural resources are significant vironmental effects, lead agencies may refer to the lifornia Agricultural Land Evaluation and Site Assessment odel (1997) prepared by the California Dept. of inservation as an optional model to use in assessing impacts agriculture and farmland. Would the project:				
	a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to a non-agricultural use?		.		
	ъ)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
-4,	c)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?				

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to a non-agricultural use?

Although portions of some parks within the study area are currently categorized as Grazing Land by the Farmland Mapping and Monitoring Program, there are no areas of designated "Farmland" located in or adjacent to the study area. Implementation of the Plan would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

None of the parks within the study area nor any of the land adjacent to the parks is zoned for agricultural use; therefore, implementation of the Plan would not conflict with existing zoning for agricultural uses or Williamson Act contracts.

c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

The purpose of the Plan is to reduce the risk of wildfire in identified high hazard areas through fuel reduction activities to be undertaken by EBRPD. The proposed actions under the plan would not result in the conversion of Farmland to a non-agricultural use. See also responses to sections II.a and b.

ш.	AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	a) Conflict with or obstruct implementation of the applicable air quality plan?	•			
	b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				
	c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				
	d) Expose sensitive receptors to substantial pollutant concentrations?		□		
	e) Create objectionable odors affecting a substantial number of people?	•			

a) Conflict with or obstruct implementation of the applicable air quality plan?

The potential air quality effects associated with the vegetation management activities, including prescribed burning, recommended in the Plan and whether they would conflict with or obstruct the implementation of any air quality plans will be evaluated in the EIR.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

As stated above, prescribed burning is a vegetation management technique that may be recommended to reduce fuels or enhance other resource values in specific areas as part of the Plan. Prescribed burning requires the development and approval of a burn plan, cooperation with State and local fire protection districts, and receipt of a burn permit from the Bay Area Air Quality Management District

(BAAQMD). The BAAQMD allows prescribed burning to reduce fire hazards, for management of forest and rangelands, and to train fire protection personnel, but the implementation of this technique carries the potential for additional air pollution resulting from fuel combustion. A significant increase in vehicular traffic and associated air pollutant emissions would not occur after implementation of the Plan, as the activities associated with the proposed fuel reduction activities would not lead to an increase in recreational facilities and park visitors.

Because the potential exists for activities undertaken as part of implementation of the Plan to violate air quality standards or contribute to an existing or projected air quality violation, these potential impacts will be evaluated in the EIR.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The potential for activities undertaken as part of implementation of the WHRRM Plan to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard will be evaluated in the EIR. See also response to section III.b.

d) Expose sensitive receptors to substantial pollutant concentrations?

As stated previously, fuel load reduction activities are most likely to occur along the western edge of the hillside parks adjacent to the wildland-urban interface to reduce wildfire threats to residential neighborhoods and in the shoreline parks of Point Pinole and Miller/Knox, where wildfire hazards and fuel loads are present. The potential for activities undertaken to implement the Plan to expose nearby residents and other sensitive receptors (such as schools) to substantial pollutant concentrations will be evaluated in the EIR.

e) Create objectionable odors affecting a substantial number of people?

The proposed fuel reduction recommendations will be evaluated in the EIR to determine whether they might create objectionable odors that will affect a substantial number of people.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	•			

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	•			
đ)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or State habitat conservation plan?				
				-	

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The study area contains plant and animal species that are identified as candidate, sensitive, or special status species. The EIR will evaluate the potential for substantial adverse effects on these species either directly or through habitat modifications associated with implementation of the vegetation management strategies and BMPs identified in the Plan.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The study area contains riparian habitat and other sensitive natural communities. The EIR will identify and evaluate any potential substantial adverse effects on riparian habitats and other sensitive natural communities associated with implementation of the vegetation management strategies and BMPs identified in the Plan.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?

Wetlands, in the form of springs and seeps, are common on the north-facing slopes of the East Bay Hills and also occur in the shoreline parks. Generally areas containing wetlands have a very low fire hazard rating. Although, the Plan does not propose any direct removal, filling, or hydrological interruption of any wetlands in the study area, the EIR will identify and evaluate any potential substantial adverse effects on wetlands associated with implementation of the fuel reduction strategies and BMPs identified in the Plan.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The regional parks within the study area are used by native resident and migratory fish and wildlife species, and do contain wildlife corridors as well as native wildlife nursery sites. The EIR will identify and evaluate whether any of the fuel reduction activities proposed by the Plan would interfere substantially with the movement of any wildlife species or impede the use of native wildlife nursery sites.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Because all projects identified as a result of the Plan will be carried out on ERBPD parklands, EBRPD is the local jurisdictional authority. As a result, all projects that may result from implementation of the Plan will be conducted in accordance with local policies and ordinances, including those protecting biological resources.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or State habitat conservation plan?

No adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State habitat conservation plans are known to exist that affect parklands included in the Study Area. As a result, the Plan would not conflict with any of these types of conservation plans.

v.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?				
	b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	•	• .		
	c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				
	d) Disturb any human remains, including those interred outside of formal cemeteries?				

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Cultural resources, including historical resources, have been identified and are located within the study area. The Plan identifies fuel load reduction activities in the vicinity of listed historical resources. The EIR will evaluate whether actions taken to implement the Plan would cause a substantial adverse change in the significance of a historical resource.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Archeological resources have been identified within the study area. Because the Plan identifies fuel load reduction activities in the vicinity of listed archeological resources, the EIR will evaluate whether actions taken to implement the Plan would cause a substantial adverse change in the significance of a an archeological resource.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Unique paleontological resources (such as fossils) and unique geologic features have been identified within the study area. Because the Plan identifies fuel load reduction activities in the vicinity of known paleontological resources or areas that might contain them, the EIR will evaluate whether actions taken to implement the Plan would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

d) Disturb any human remains, including those interred outside of formal cemeteries?

During the course of conducting the vegetation management activities to reduce fuel loads, human remains that are interred outside formal cemeteries may be disturbed, and this potential impact will evaluated in the EIR.

			Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VI.	G	EOLOGY AND SOILS. Would the project:				
	a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
		i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	. 🗖			
		ii) Strong seismic ground shaking?				
		iii) Seismic-related ground failure, including liquefaction?			\	
		iv) Landslides?				
	b)	Result in substantial soil erosion or the loss of topsoil?				
	c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
	d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				
	e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			<u> </u>	•
a)	in	xpose people or structures to potential substantial ad ijury, or death involving: i) Rupture of a known earth ecent Alquist-Priolo Earthquake Fault Zoning Map is	quake fault,	, as delineate	ed on the n	iost

or based on other substantial evidence of a known fault? Refer to Division of Mines and

- Geology Special Publication 42; ii) Strong seismic ground shaking; iii) Seismic-related ground failure, including liquefaction; iv) Landslides?
- i) Earthquake Fault Rupture. The study area is located within the seismically active San Francisco Bay Area. The Hayward fault, trending northwest to southeast, parallels the East Bay Hills and intersects portions of several parks in the study area. The Hayward Fault has the potential to produce a maximum credible earthquake of an approximate magnitude of 7.5. Surface rupture occurs when the ground surface is broken due to fault movement during an earthquake, usually along an active major fault trace, such as the Hayward fault zone. Although the potential for fault rupture in the study area exists, the vegetation management activities being proposed under the Plan would not include the construction of facilities or buildings within which people or property would be exposed to potential substantial adverse effects, including the risk of loss, injury, or death, related to ground rupture from an earthquake. Therefore, implementation of the Plan would have a less-than-significant adverse impact related to earthquake fault rupture.
- ii) Strong Seismic Ground Shaking. Because EBRPD lands are located in a region of high seismicity, the entire area would experience strong ground shaking in the event of an earthquake. Low-lying areas underlain by soft soils would tend to have more intense shaking than areas underlain by bedrock. However, strong ground shaking is a substantial hazard throughout the region. The vegetation management activities being proposed under the Plan would not include the construction of facilities or buildings within which people or property would be exposed to potential substantial adverse effects, including the risk of loss, injury, or death, related to strong seismic ground shaking from an earthquake. Therefore, implementation of the Plan would have a less-than-significant adverse impact related to strong seismic ground shaking.
- iii) Seismic-related Ground Failure and Liquefaction. Liquefaction is the temporary transformation of loose, saturated granular sediments from a solid state to a liquefied state as a result of seismic ground shaking. In the process, the soil undergoes transient loss of strength, which commonly causes ground displacement or ground failure to occur. Since saturated soils are a necessary condition for liquefaction, soil layers in areas where the groundwater table is near the surface have higher liquefaction potential than those in which the water table is located at greater depths. Regional liquefaction hazard mapping indicates that the majority of the upland study area is rated very low for liquefaction hazard, the exception being some small areas near Wildcat and San Leandro Creeks. Low-lying areas near the shore of San Francisco Bay comprised of fill over Bay Mud and Point Reyes Clay are rated moderate to high for liquefaction potential. Earthquake shaking leading to liquefaction of saturated soil can result in lateral spreading where the soil undergoes a temporary loss of strength. The upland study area topography is gently rolling to steeply sloped and includes creeks or other open bodies of water. The study area is generally not susceptible to liquefaction hazards, and therefore, the risk of lateral spreading is considered to be potentially low in the upland areas. However, in the shoreline parks and those areas underlain by fill (Urban Land) and Bay Mud or Point Reyes Clay soils the lateral spreading hazard will mirror the liquefaction hazard, and open trenches or excavations may present an opportunity for a lateral spreading hazard to occur. Because the fuel reduction activities proposed in the Plan may include the removal of vegetation on slopes, thereby creating conditions for seismic-related ground failure, the EIR will evaluate potential impacts associated with this issue.

- iv) Landslides. Slope failure can occur as either rapid movement of large masses of soil ("landslide") or slow, continuous movement ("creep"). The primary factors influencing the stability of a slope are: 1) the nature of the underlying soil or bedrock, 2) the geometry of the slope (height and steepness), 3) rainfall, and 4) the presence of previous landslide deposits. The study area contains approximately 5,000 acres of terrain that is considered "mostly landslides." Areas categorized as "mostly landslides" consist of mapped landslides, intervening areas narrower than 1,500 feet, and narrow borders around landslides. Many of these are historical, however, any area that contains landslides constitutes a potential slope stability hazard. Because the fuel reduction activities proposed in the Plan may include the removal of vegetation on slopes with previous landslide deposits, thereby creating conditions potentially conducive for landslides, the EIR will evaluate potential impacts associated with this issue.
- b) Result in substantial soil erosion or the loss of topsoil?

The upland portions of the study area east of the Hayward fault are mostly on hillsides and near the tops of ridges. The soils in these areas are generally shallow, and the erosion hazard is generally high to very high. The presence of vegetation tends to reduce the potential for shallow erosion. The National Resource Conservation Service (NRCS) soil survey catalogues at least 30 different soil varieties within the study area plus variations within these based on slope steepness. The EIR will evaluate whether the fuel reduction activities would result in substantial soil erosion or substantial loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

More than 40 percent of the study area has been classified as having the potential for slope instability. The potential for fuel modification activities to result in landslides, lateral spreading, or liquefaction will be evaluated in the EIR. See also responses to VI.a.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Expansion and contraction of volume can occur when expansive soils undergo alternating cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of the soil changes markedly. As a consequence of such volume changes, structural damage to building and infrastructure may occur if the potentially expansive soils were not considered in project design and during construction. The hillside parks in the study area are located on steep slopes with shallow loam based soils. The soil types are generally noted to have low shrink-swell potential. Soils with a high clay content, such as those found in alluvial deposits near the Bay may be prone to expansion and shrinking in response to changing moisture levels. These changes tend to occur slowly enough so that catastrophic building failures are not likely, but can cause buckling or cracking in flatwork, and cracks in structure walls, as well as settlement of foundations. The focus of the Plan is on the modification of vegetation to reduce fuel loads in areas that have been found to have high hazard conditions for wildland fires. Therefore, the Plan does not propose the construction of any new structures, and potential impacts related to locating a building on expansive soils would be less-than-significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The Plan does not propose to develop any new facilities or structure that would require a septic tank or septic system, and no potential impacts associated with septic systems would occur.

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VII.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	•			
Ъ	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
. c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	•			
ď	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
f)	For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The Plan will identify a number of possible fuel reduction techniques including the use of vehicles and mechanical equipment that would require fueling and the use of herbicides. The potential for hazardous materials associated with these issues to crate a significant hazard to the public or the environmental will be evaluated in the EIR.

- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- The potential for reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment that would be associated with the fuel reduction actions identified in the Plan will be evaluated in the EIR.
 - c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The EIR will evaluate the potential for hazardous emissions associated with fuel reduction actions to be emitted within one-quarter mile of an existing or proposed school if such facilities are determined to exist.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The shoreline parks within the study area may contain or are adjacent to sites that contain hazardous materials related to landfills or past maritime or industrial uses. This issue will be evaluated in the EIR.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The study area is not located within an airport land use plan or within 2 miles of an airport. Implementation of the proposed Plan would not expose people working in the study area to airport-related hazards.

f) For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

The study area is not located within the vicinity of a private airstrip. Implementation of the proposed Plan would not expose people working in the study area to airport-related hazards.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Plan will consider and take into account the adopted emergency response plan or emergency evacuation plans of EBRPD and all adjacent emergency service districts and jurisdictions. The proposed Plan does not propose the development of infrastructure, facilities or structures that would impair or interfere with any emergency response plan or emergency evacuation plan.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The purpose of the Plan is to guide ongoing vegetation management activities on EBRPD park lands along the urban-wildland interface to reduce the likelihood of a catastrophic, wind-driven wildfire. As a result, exposure of people and structures to wildland fires is expected to decrease as a result of vegetation management and fuel reduction projects implemented as a result of the Plan.

	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Violate any water quality standards or waste discharge requirements?		-		
Ъ)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				

a)

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact			
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?							
e)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	*						
f)	Otherwise substantially degrade water quality?							
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?							
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?							
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding of as a result of the failure of a levee or dam?							
j)	Inundation by seiche, tsunami, or mudflow?							
V	iolate any water quality standards or waste discharge	e requireme	nts?					
***	reger and located throughout the state of the Complete Co							

Water resources are located throughout the study area in the form of perennial creeks, streams, springs, ponds, intermittent water sources, and reservoirs. These resources may be affected during vegetation management activities to reduce fuel loads. The EIR will identify the potential for implementation of the fuel reduction strategies and BMPs identified in the Plan to violate any water quality standards or waste discharge requirements.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

The Plan does not propose to use groundwater supplies as part of the fuel reduction activities nor does it propose the construction of infrastructure or facilities that would increase impervious surfaces leading to a substantial depletion of groundwater supplies or interference with groundwater recharge.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Water resources within the study area include a number of perennial creeks, streams, springs, ponds, intermittent water sources, and reservoirs. The EIR will identify the potential for implementation of the fuel reduction strategies and BMPs identified in the Plan to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

The EIR will identify the potential for implementation of the fuel reduction strategies and BMPs identified in the Plan to substantially alter the existing drainage pattern of the site or area, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The EIR will identify the potential for implementation of the fuel reduction strategies and BMPs identified in the Plan to create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

f) Otherwise substantially degrade water quality?

The EIR will identify the potential for implementation of the fuel reduction strategies and BMPs identified in the Plan to substantially degrade water quality.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

The Plan does not propose the construction of any residential housing and would not place housing within a 100-year flood hazard area.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

The Plan does not propose the construction of infrastructures, facilities or structures that would potentially impede or redirect flood flows.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding of as a result of the failure of a levee or dam?

See explanations VIII.g and VIII.h.

j) Inundation by seiche, tsunami, or mudflow?

A tsunami with a 200-year recurrence interval has an estimated run of up to 7 to 10 feet in the vicinity of the study area's shoreline parks. Because of the location of these parks on the San Francisco Bay shoreline, portions of parks within the study area may be affected by a tsunami. However, the project being evaluated is the WHRRM Plan the purpose of which is to reduce wildfire hazards. The Plan does not propose the construction of infrastructures, facilities or structures along the shoreline or in locations that would be affected by a tsunami, a seiche or a mudflow

IX.	L	AND USE AND PLANNING. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	a)	Physically divide an established community?				
	b)	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	=			
	c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?				

a) Physically divide an established community?

In general, residential and institutional uses occur to the west of the EBRPD hillside parks and undeveloped areas of Contra Costa County and Alameda County lie to the north, east and south. The San Francisco Bay lies to the west of the shoreline parks and industrial, office, commercial and residential development is located to the east. Because the study area of the Plan is confined to the parks owned and operated by the EBRPD, there are no established communities located within the study area. In addition, the development of infrastructure, facilities or structures that might physically divide a community is not proposed as part of the Plan. Therefore, implementation of the Plan would not divide an established community.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? The EBRPD¹ (Master Plan) defines the vision and mission of EBRPD and sets priorities for a 10-year period (1997-2007). The Master Plan provides policies and guidelines for achieving the highest standards of service in resource conservation, management, interpretation, public access and recreation. In addition, land use development plans have been developed and adopted by EBRPD for 11 parks in the study area. Each plan includes policies and objectives related to resource management and fire suppression and control for that particular park. The potential for the policies and guidelines of the Plan to conflict with any applicable land use plan or policy adopted for the purpose of avoiding or mitigating an environmental effect will be evaluated in the EIR.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No habitat conservation plans or natural community conservations plan exist with which the Plan could potentially conflict.

х.	MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	·No Impact
	a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				
	b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

The purpose of the Plan is to reduce the risk of wildfire in identified high hazard areas through fuel reduction activities to be undertaken by EBRPD. The vegetation management actions proposed as part of the Plan would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

¹ East Bay Regional Park District, 1996. *Master Plan 1997*, December 17. Note that the Master Plan map was updated in 2007.

The vegetation management actions proposed as part of the Plan would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. See also explanation X.a.

		•	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.		NOISE. Would the project result in:				
	a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
	b)	Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?				
	c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			•	•
	d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				
	e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			• · · · · · · · · · · · · · · · · · · ·	
	f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

The EIR will evaluate whether implementation of the fuel reduction strategies (such as the use mechanical equipment to remove vegetation) have the potential to expose persons to or generate noise levels in excess of standards established in the local general plans or noise ordinances, or applicable standards of other agencies.

b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?

The EIR will evaluate whether implementation of the fuel reduction strategies (such as the use mechanical equipment to remove vegetation) have the potential to expose people to excessive groundborne vibrations and noise levels.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Certain fuel reduction methods proposed by the Plan (such as the use of mechanical equipment to remove vegetation or the use of grazing animals) would result in the short-term generation of noise above ambient levels while vegetation management activities are taking place. However, the generation of noise would be of short duration and would not result in a substantial permanent increase in ambient noise levels in the project vicinity.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Certain fuel reduction methods proposed by the Plan (such as the use of mechanical equipment to remove vegetation or the use of grazing animals) would result in the short-term generation of noise above ambient levels. The EIR will evaluate whether implementation of the Plan would result in a substantial temporary or periodic increases in ambient noise levels in the project vicinity which results in a significant impact.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The study area is not located within an airport land use plan or within 2 miles of a public airport or a public use airport. Therefore, implementation of the Plan would not expose people working in the project area to excessive noise levels associated with airport operations.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The project site is not located within the vicinity of a private airstrip. Therefore, implementation of the Plan would not expose people working in the project area to excessive noise levels associated with airport operations.

XII.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Implementation of the Plan would occur solely on EBRPD lands and would not result in the construction of new homes or businesses, and the Plan does not propose the extension of public or private roads and other infrastructure into previously undeveloped areas. The Plan would not directly or indirectly induce population growth.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Although there are a very limited number of residences located within the parks within the study area (approximately 14 residences), implementation of the fuel reduction activities identified in the Plan would not displace the residents living within these structures. Rather, the purpose of activities undertaken as part of the Plan is to limit the future displacement of residents within and adjacent to the parks associated with a catastrophic wildland fire. Therefore, implementation of the Plan would not result in the displacement of substantial numbers of existing residents, necessitating the replacement of housing elsewhere.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

See explanation XII.b. above.

XIII. PUBI	LIC SERVICES.	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
impa phys or pl cons envi servi	ald the project result in substantial adverse physical acts associated with the provision of new or sically altered governmental facilities, need for new hysically altered governmental facilities, the struction of which could cause significant ronmental impacts, in order to maintain acceptable ice ratios, response times or other performance ctives for any of the public services:	<u> </u>			
Fire	protection?				
Polic	ce protection?				
Scho	pols?				
Park	s?				
Othe	er public facilities?				

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection, police protection, schools, parks, other public facilities?

The Plan does not propose the construction of new or altered government facilities, and no additional governmental facilities would be required in order to conduct the fuel management activities proposed by the Plan. Fire protection and emergency services are provided to the parks in the study area by EBRPD and surrounding fire protection districts. The purpose of the Plan is to manage vegetation to reduce the potential for a catastrophic wildfire; while EBRPD staff will manage and conduct the fuel management activities over time, the District has sufficient facilities and offices for the required personnel. EBRPD also will use other sources of labor, e.g., outside contractors, the California Conservation Corps, and volunteers. EBRPD provides standard contract language to ensure that staff or contractors undertaking fuel reduction projects would stop work when fire danger conditions warrant to reduce the potential for ignitions and to protect life and property. As such, implementation of the Plan would result in beneficial impacts to fire protection services.

EBRPD and municipal police departments provide police protection services to the parks in the study area and the surrounding vicinity. Implementation of the fuel reduction activities and resource

management projects identified in the Plan would not require additional police protection services such that acceptable service ratios and response times could not be maintained. Therefore, implementation of the Plan is expected to result in less-than-significant impacts to police services.

Because the Plan would not result in any local or regional population increase which would lead to a subsequent increase in student enrollment in public schools, implementation of the Plan would not require the construction of new schools or result in school capacity being exceeded.

The Plan would not result in a population increase or the construction of new recreation facilities that would adversely impact the provision of parkland to population ratios or goals. In addition, implementation of the Plan would not impact any other public facilities, such as libraries.

YIV I	RECREATION.	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
			_		
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?		/		
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The Plan does not propose to develop recreational infrastructure, trails, facilities or structures that might increase the use of the regional parks such that substantial physical deterioration of the facility would occur or be accelerated. The vegetation management activities proposed by the Plan would not in themselves cause an increase the number of visitors to the parks that would lead to significant adverse effects to the environment.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The Plan does not include proposals to construct any recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

XV.	TRANSPORTATION/TRAFFIC. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?			•	
ь)	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency or designated roads or highways?				
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
e)	Result in inadequate emergency access?				
f)	Result in inadequate parking capacity?				
g)	Conflict with adopted polices, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				I ,

a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

The Plan does not include any proposals to construct infrastructure, facilities or permanent structures that would cause an increase in the number of visitors at the park and a related increase in the vehicular trips and traffic. Therefore, implementation of the Plan would not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system. The fuel reduction activities proposed in the Plan may result in temporary circulation impacts while equipment and personnel are transported to and access locations where fuel reduction activities will occur; however, these disruptions would be short term in nature. Additionally, these temporary traffic impacts would be less than significant because fuel management activities would not occur throughout all the study area parks simultaneously, but would be temporary and occur in site-specific areas.

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

See explanation in Section XV.a.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Implementation of the Plan would not result in a change in air traffic patterns.

d) Substantially increase hażards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Plan does not include any proposals to change the design of roadways, intersections or parking areas, and does not include the construction of any infrastructure, facilities or permanent structures. Implementation of the Plan may result in temporary circulation impacts while equipment and personnel are transported to and access locations where fuel reduction activities will occur; however, these disruptions would be short term in nature and any potentially adverse impacts would be less than significant.

e) Result in inadequate emergency access?

Implementation of the Plan would not substantially alter roads or other infrastructure used or identified as emergency access routes. Rather, the Plan would include the identification of strategic fire routes to be used for emergency access and evacuation. The project would not result in inadequate emergency access.

f) Result in inadequate parking capacity?

The Plan does not include uses that would directly increase the amount of visitors to the parks in the study area. As such, the Plan would not result in inadequate parking capacity.

g) Conflict with adopted polices, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

The fuel reduction activities identified in the Plan would not conflict with any adopted policies, plans, or programs that support alternative transportation.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	. 🗖			

,		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
c)	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				
e)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			ā	
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				
g)	Comply with federal, State, and local statutes and regulations related to solid waste?				

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Implementation of the Plan would not result in the construction of any new permanent structures that would generate wastewater or require wastewater treatment. Therefore, implementation of the Plan would not exceed wastewater treatment requirements of the San Francisco Bay Area Regional Water Quality Control Board.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The fuel reduction strategies proposed under the Plan would not require large amounts of water or produce large amounts of wastewater. The Plan does not propose the development or planting of landscaped areas requiring irrigation or construction of facilities or uses that would use a large amount of water. Therefore, implementation of the Plan would not require or result in the construction of new water or wastewater treatment facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The Plan does not propose the construction of any infrastructure (including new storm water drainage facilities), facilities, structures or impervious surfaces. As such, the Plan would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Implementation of the Plan would not result in the use of substantial amounts of water. Existing water supplies would be sufficient to serve the proposed project. See also explanation XVI.a.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

See explanation XVI.a.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

EBRPD currently maintains a number of contracts for tree removal, vegetation clearance, and waste disposal. The majority of wastes produced at park lands within EBRPD's jurisdiction are considered green wastes, including wood chips, felled or fallen branches, and other types of slash. While EBRPD does not currently have a District-wide composting or green waste disposal policy, several parks have site-specific programs for the disposal of such wastes. All mowing activities at EBRPD parks result in the cutting and distribution of cut grasses and forbs onsite; when trees are felled by EBRPD staff they are cut to firewood length and distributed offsite. Slash chipped by EBRPD staff is left onsite or moved to larger piles within the park and used as mulch.

Materials collected and removed under existing contracts become the property of the contractor upon collection and are disposed of offsite. These contractors typically dispose of green wastes at area-wide landfills.² Within Alameda County, General Ordinance Code Title 6, Section 40.430 prohibits the use of organic wastes as part of the daily sanitary cover requirement; as such, green waste material disposed of in the Vasco Road Sanitary Landfill is counted toward the landfill's permitted capacity.³ Within Contra Costa County, the West Contra Costa County Landfill maintains an onsite composting facility for disposal of green and untreated wood wastes.⁴ Green wastes disposed at the Acme and Keller Canyon Landfills are used intermittently as alternative daily cover; in 2005 these materials

² Smothers, Steven, 2008. Personal Communication with LSA Associates, Inc. April.

³ Alameda County, 2008. Alameda County General Ordinance Code Title 6, Section 40.430. January.

⁴ Contra Costa County, 2008. Contra Costa County Reuse and Recycling Options. http://www.co.contra-costa.ca.us/depart/cd/recycle/options/v5126.htm. Accessed April 9, 2008.

comprised 27.7 percent and 9.6 percent of all wastes accepted at these landfills, respectively.^{5,6} Alameda County's Vasco Road Sanitary Landfill reported an estimated remaining capacity of 9.8 million cubic yards (30.9 percent) in 2000.⁷ Contra Costa County's Acme Landfill reported an estimated remaining capacity of 175,000 cubic yards (65.1 percent) in 2000, and Keller Canyon reported an estimated remaining capacity of 68.3 million cubic yards (91 percent) in 2000.⁸

Implementation of the proposed project would result in the planning and execution of a systematic vegetation management and fuel reduction program for park lands under EBRPD's jurisdiction. Activities included as a result of the Plan would include similar waste generation rates to those already realized by management efforts undertaken by EBRPD and its contractors. While these activities would result in the continued generation of timber and plant materials removed from treatment areas to reduce wildfire hazards and the likely disposal of these materials in existing landfills within Alameda and Contra Costa Counties, the use of green wastes as daily sanitary cover at two of these landfills and the operation of an onsite composting facility at one landfill would reduce the total amount of green wastes contributing to permitted capacity at these facilities. Estimated remaining capacities at area landfills are also sufficiently high to accommodate the disposal needs of EBRPD's contractors when removing materials as a result of wildfire hazard reduction activities. Because of these factors, the Plan would not result in increases to solid waste disposal needs exceeding the existing permitted capacity of receiving landfills; any potential impacts to landfill capacity resulting from implementation of the Plan would be less than significant.

g) Comply with federal, State, and local statutes and regulations related to solid waste?

The Plan would comply with all federal, State, and local statutes related to solid waste.

⁵ California Integrated Waste Management Board (CIWMB), 2008. Active Landfills Profile for Keller Canyon Landfill (07-AA-0032). http://www.ciwmb.ca.gov/Profiles/Facility/Landfill/LFProfile2.asp?COID=7&FACID=07-AA-0032. Accessed April 9, 2008.

⁶ CIWMB, 2008. Active Landfills Profile for Acme Landfill (07-AA-0002). http://www.ciwmb.ca.gov/Profiles/Facility/LandFill/LFProfile2.asp?COID=07&FACID=07-AA-0002. Accessed April 9, 2008.

⁷ CIWMB, 2008. Active Landfills Profile for Vasco Road Sanitary Landfill (01-AA-0010). http://www.ciwmb.ca.gov/Profiles/Facility/Landfill/LFProfile1.asp?COID=7&FACID=01-AA-0010. Accessed April 9, 2008.

⁸ CIWMB, 2008. Active Landfills Profiles for Acme and Keller Canyon Landfills. (see footnotes 5 and 6, above.) Accessed April 9, 2008.

XVII.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?				
Ъ)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)				
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

The Plan includes strategies to reduce fuel loads while maintaining and enhancing ecological values for plant and wildlife habitat and preserving aesthetic landscape values for park users and neighboring communities. The fuel reduction and resource management strategies included in the Plan are intended to result in long-term beneficial effects on the habitat of a fish or wildlife species, populations and communities, including special-status species. The Plan actions, policies and guidelines will be evaluated in the EIR to determine if implementation of the Plan would cause significant impacts that would degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The Plan actions, policies and guidelines will be evaluated in the EIR to determine if implementation of the Plan would have impacts that are individually limited, but cumulatively considerable.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Implementation of the Plan is not expected to have environmental effects which will cause substantial adverse effects on human beings. The objective of the Plan is to reduce the risk of a wildfire in identified high hazard areas through fuel reduction actions undertaken by EBRPD that are conducted in a manner that reduces adverse environmental effects and implements resource and habitat management goals. The Plan's actions, policies, and guidelines will be evaluated in the EIR, however, to accurately assess any potential adverse environmental effects on humans.

REPORT PREPARATION

A. REPORT PREPARERS

LSA Associates, Inc. 2215 Fifth Street Berkeley, CA 94710

175 Park Place Point Richmond, CA 94801

Malcolm Sproul, Principal-in-Charge
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Amy Paulsen, AICP, Planner
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Jennifer Morris, Graphics and Word Processing

East Bay Regional Park District Staff

Brian Wiese, Chief of Planning and Stewardship

Joseph DiDonato, Stewardship Manager

Ken Blonski, Fire Chief

John Swanson, Assistant Fire Chief

B. REFERENCES

Alameda County, 2008. Alameda County General Ordinance Code Title 6, Section 40.430. January.

- California Integrated Waste Management Board (CIWMB), 2008. Active Landfills Profile for Keller Canyon Landfill (07-AA-0032). http://www.ciwmb.ca.gov/Profiles/Facility/Landfill/LFProfile2.asp?COID=7&FACID=07-AA-0032. Accessed April 9, 2008.
- California Integrated Waste Management Board, 2008. Active Landfills Profile for Acme Landfill (07-AA-0002). http://www.ciwmb.ca.gov/Profiles/Facility/LandFill/LFProfile2.asp?COID=07&FACID=07-AA-0002. Accessed April 9, 2008.
- California Integrated Waste Management Board, 2008. Active Landfills Profile for Vasco Road Sanitary Landfill (01-AA-0010). http://www.ciwmb.ca.gov/Profiles/Facility/Landfill/LFProfile1.asp?COID=7&FACID=01-AA-0010. Accessed April 9, 2008.

- California Integrated Waste Management Board, 2008. Active Landfills Profiles for Acme and Keller Canyon Landfills. Accessed April 9, 2008.
- Contra Costa County, 2008. Contra Costa County Reuse and Recycling Options. http://www.co.contra-costa.ca.us/depart/cd/recycle/options/v5126.htm. Accessed April 9, 2008.
- East Bay Regional Park District, 1996. Master Plan 1997, December 17. Note that the Master Plan map was updated in 2007.

C. COMMUNICATIONS

Smothers, Steven, 2008. Personal Communication with LSA Associates, Inc. April.



May 19, 2008

Brian Wiese Chief of Planning and Stewardship EBRPD 2950 Peralta Oaks Court Oakland CA 94605-0381

Dear Brian:

The East Bay Municipal Utility District (EBMUD) owns and manages approximately 28,000 acres of land and water surface in the East Bay area, much of which is located in close proximity to large land parcels belonging to the East Bay Regional Park District (Park District). EBMUD and the Park District have a mutual interest in protecting human life and providing for public safety while enhancing the natural resources of the East Bay hills. Although wildfire can occur and cause damage anywhere, the risk is highest in interface areas. The spread of wildfire across shared property boundaries can be minimized through cooperative intra-agency planning. This approach will improve fire management efficiency and effectiveness.

EBMUD supports the Park District's Wildland Hazard Reduction and Resource Management Plan and continued multiagency cooperation to reduce the fire hazard in the East Bay hills.

Sincerely.

Scott Hill

Manager of Watershed and Recreation

CITY OF OAKLAND



250 FRANK H. OGAWA PLAZA, SUITE 3315 + OAKLAND, CALIFORNIA 94612-2032

Community and Economic Development Agency Planning & Zoning Services Division

(510) 238-3941 FAX (510) 238-6538 TDD (510) 238-3254

May 22, 2008

East Bay Regional Park District Brian Wiese, Chief of Planning and Stewardship 2950 Peralta Oaks Court Oakland, CA 94605-3478

Subject: Notice of Preparation of Draft Environmental Impact Report for the Wildfire Hazard Reduction and Resource Management Plan

Dear Mr. Wiese:

Thank you for the opportunity to comment on the above-referenced project. We offer the following views as to the scope and content of the forthcoming Environmental Impact Report (EIR):

- 1. The City is working with Caltrans to designate the Highway 13 corridor as a "Scenic Highway." The primary scenic quality of the corridor is greatly impacted by vegetation management practices, particularly in the areas around Temescal Regional Park. The EIR should address any potential impact of the proposed project vis-à-vis scenic considerations in the vicinity of Temescal Regional Park.
- 2. The EIR should indicate access requirements to vegetation management areas across City property, as there are many areas where both City and EBRPD park lands are adjacent to one another.
- 3. The EIR should also include discussion of habitat conservation plans for creeks that may cross between City and EBRPD park lands (e.g. Sausal Creek, Redwood Creek) and how the proposed project might be integrated with City of Oakland plans.
- 4. It is our understanding that EBRPD is subject to compliance with the City of Oakland's Tree Ordinance and Creek Protection Ordinance for lands that are within Oakland's city limits. The EIR should reference these and other ordinances as applicable.

Lastly, we request our department be added to the mailing list for receipt of subsequent documents related to the EIR project. Materials may be directed to the following persons:

Kerry Jo Ricketts-Ferris City of Oakland CEDA-- Planning Department 250 Frank Ogawa Plaza, Suite 3315 Oakland, CA 94612

Elois A. Thornton City of Oakland CEDA--Planning Department 250 Frank Ogawa Plaza, Suite 3315 Oakland, CA 94612

Should you have questions and/or need additional information please contact Mrs. Ricketts-Ferris at (510) 238-3944 or myself at (510) 238-6284.

Thank you again.

ELOIS A. THORNTON

Planner IV

Judith Malamut

From: Sent: Brian Wiese [bwiese@ebparks.org] Tuesday, May 27, 2008 10:19 AM

To:

Judith Malamut

Subject:

FW: [Website feedback] Wildfire Hazard Reduction and Resource Management Plan

----Original Message----From: EBRPD - Public Affairs

Sent: Tuesday, May 27, 2008 10:11 AM

To: Brian Wiese

Subject: FW: [Website feedback] Wildfire Hazard Reduction and Resource Management Plan

----Original Message----

From: mthomson@oaklandnet.com [mailto:mthomson@oaklandnet.com]

Sent: Thu 5/22/2008 11:17 AM

Subject: [Website feedback] Wildfire Hazard Reduction and Resource

Management Plan

Mitchell Thomson sent a message using the contact form at http://www.ebparks.org/contact.

To Brian Wiese,

As part of the Plan, the Tree Services Division of the City of Oakland encourages EBRPD TO remove Monterey pine and blue gum growing near the edge of roads, on public rights-of-way, adjacent to EBRPD property.



Ruth G. Coleman, Director

Diablo Vista District 845 Casa Grande Road Petaluma, California 94954

June 5, 2008

Brian Wiese East Bay Regional Park District 2950 Peralta Oaks Court Oakland, CA 94605

RE: Eastshore State Park – Wildlife Hazard Reduction and Resource Management Plan Notice of Preparation (NOP), SCH #2008042099

Dear Mr. Wiese,

State Parks received the Wildfire Hazard Reduction and Resource Management Plan NOP (SCH #2008042099) two days after the final comment period had closed. Therefore, State Park staff is sending you our comments directly. State Park staff looks forward to receiving a copy of the Draft Environmental Impact Report (DEIR) for review. Please send the DEIR to the address listed on this letterhead.

State Park staff were not notified of the four project meetings and scoping sessions regarding this project. In the future, please pre-notify State Park Diablo Vista District staff of such meetings for Robert W. Crown Memorial State Beach, Eastshore State Park, and for Lake Del Valle as these three properties are owned in fee by State Parks. While EBRPD operates these three parks, State Park planning and resource management staff remain very interested in what management strategies EBRPD proposes to implement within these park units.

State Park staff is concerned over any proposed vegetation removal within Eastshore State Park. Current vegetated areas are occupied by raptors and other sensitive plant and animal species. Any vegetation removal should only occur with concurrence by State Park Environmental Scientist staff. State Park staff fail to see how a vegetative fire in Eastshore State Park would be catastrophic in nature given that the area is surrounded by hardscape (asphalt and pavement areas).

Specific goals contained in the NOP indicate that EBRPD will reduce fire hazards on District-<u>owned</u> lands in the East Bay's UWI to an acceptable level of risk. As a reminder, EBRPD does not own Lake Del Valle, Robert W. Crown Memorial State Beach, or Eastshore State Park, and as such we highly encourage that EBRPD staff consult with State Park Environmental Scientist staff when implementing resource based projects within these three park units.

On page 3 of the NOP there is a statement that mentions maintaining and enhancing ecological values for plant and wildlife habitat that will be consistent with fire reduction goals. This is an action of concern as often times removing vegetation, for fire reduction purposes, can have direct and immediate impacts on plants and wildlife that use these vegetated areas for habitat, foraging and nesting, refuge, escape, migratory stop overs, and cover from predators. Again, it is essential that vegetation removal plans have the concurrence from State Park Environmental Scientist staff prior to implementation.

Please contact State Park Environmental Scientist staff as you go through the DEIR planning process, as State Park participation is essential in developing such plans that have the potential to significantly impact biological resources within these three State owned properties. We look forward to working with you throughout the planning process. If you have any questions please call me anytime.

Sincerely,

Stephen Bachman

Associate Park & Recreation Specialist



May 30, 2008

Mr. Brian Wiese Chief, Planning and Stewardship East Bay Regional Parks District 2950 Peralta Oaks Court Oakland, California 94605

SUBJECT: BCDC Inquiry File Nos. CC.MC.7305.1 & CC.PP.6602.2; Comments on Notice of Preparation (NOP) for the Wildlife Hazard Reduction and Resource Management Plan Draft Environmental Impact Statement, State Clearinghouse Number 2008042099

Dear Mr. Wiese:

This letter conveys the staff comments on the Notice of Preparation (NOP) for the Wildlife Hazard Reduction and Resource Management Plan draft Environmental Impact Statement, State Clearinghouse Number 2008042099, dated April 2008 and received in our office on April 23, 2008. The San Francisco Bay Conservation and Development Commission (BCDC or Commission) has not reviewed the NOP, but the following staff comments are based on the San Francisco Bay Plan (Bay Plan) as amended through February 2008, the McAteer-Petris Act, and staff review of the NOP. We hope that these comments are considered by the East Bay Regional Parks District (EBRPD) when preparing the draft environmental impact statement (DEIS).

The NOP states that EBRPD is developing a plan to guide ongoing vegetation management activities on EBRPD parklands along the Urban-Wildlife Interface (UWI) to reduce the likelihood of a catastrophic, wind-driven wildfire. The NOP states that there are areas within the EBRPD lands at high risk of producing or conducting a devastating wildfire. Ongoing management is need to reduce the risk of wildfire emerging from, or moving through, EBRPD lands and igniting residential neighborhoods and other structures and facilities within the UWI. The goals of the Wildlife Hazard Reduction and Resource Management Plan are:

- Reduce fire hazards on District-owned lands in the East Bay's UWI to an acceptable level
 of risk;
- Maintain and enhance ecological values for plant and wildlife habitat consistent with fire reduction goals;
- · Preserve aesthetic landscape values for park users and neighboring communities; and
- Provide a vegetation and management plan which is cost-effective to EBRPD on a continuous basis.

area between the shoreline and the line 100 feet upland and parallel to the shoreline, which is defined as the Commission's 100-foot "shoreline band" jurisdiction. The shoreline is located at the mean high tide line, except in marsh areas, where the shoreline is located at five feet above mean sea level. The DEIR should identify areas within the shoreline parks of Point Pinole and Miller/Knox that overlap with BCDC's jurisdiction.

Mr. Brian Wiese May 30, 2008 Page 2

The NOP identifies seven shoreline parks within the study area, which are, from north to south: Point Pinole Regional Shoreline, Miller/Knox Regional Shoreline, Brooks Island Regional Shoreline, East Shore State Park, Middle Harbor Shoreline Park, Robert W. Crown Memorial State Beach, and Martin Luther King Jr. Regional Shoreline. The NOP further states that, while the study area includes these seven shoreline parks, the primary focus of the Plan will be on the wildland-urban interface along the western edge of the East Bay hill parks and the shoreline parks of Point Pinole and Miller/Knox, where wildfire hazards and fuel loads are of great concern. These seven parks are designated for waterfront park priority use in the Bay Plan.

Water Quality. The Bay Plan policies on water quality state, in part that, "new projects should be sited, designed, constructed and maintained to prevent or, if prevention is infeasible, to minimize the discharge of pollutants into the Bay by: (a) controlling pollutant sources at the project site; (b) using construction materials that contain nonpolluting materials; and (c) applying appropriate, accepted and effective best management practices, especially where water dispersion is poor and near shellfish beds and other significant biotic resources... To protect the Bay and its tributaries from the water quality impacts of nonpoint source pollution, new development should be sited and designed consistent with standards in municipal stormwater permits and state and regional stormwater management guidelines, where applicable, and with the protection of Bay resources. To offset impacts from increased impervious areas and land disturbances, vegetated swales, permeable pavement materials, preservation of existing trees and vegetation, planting native vegetation and other appropriate measures should be evaluated and implemented where appropriate... Whenever practicable, native vegetation buffer areas should be provided as part of a project to control pollutants from entering the Bay, and vegetation should be substituted for rock riprap, concrete, or other hard surface shoreline and bank erosion control methods where appropriate and practicable. "

The DEIR should consider BCDC policies on water quality to ensure that the potential for polluted runoff or other impacts to water quality do not result from wildfire management techniques.

Bay Plan Policies on Tidal Marshes, Tidal Flats and Subtidal Areas. The Bay Plan policies on tidal marshes, tidal flats, and subtidal areas state, in part that, "projects should be sited and designed to avoid, or if avoidance is infeasible, minimize adverse impacts on any transition zone present between tidal and upland habitats. Where a transition zone does not exist and it is feasible and ecologically appropriate, shoreline projects should be designed to provide a transition zone between tidal and upland habitats."

The DEIR should evaluate any potential impacts from fuel reduction and vegetation management activities to tidal marshes and tidal flats, including wetland areas consistent with Bay Plan policies.

Bay Plan Policies on Fish, other Aquatic Organisms and Wildlife. The Bay Plan policies on fish, other aquatic organisms and wildlife state, in part that, "specific habitats that are needed to conserve, increase or prevent the extinction of any native species, species threatened or endangered, species that the California Department of Fish and Game has determined are candidates for listing as endangered or threatened under the California Endangered Species Act, or any species that provides substantial public benefits, should be protected, whether in the Bay or behind dikes... Not authorize projects that would result in the "taking" of any plant, fish, other aquatic organism or wildlife species listed as endangered or threatened pursuant to the state or federal endangered species acts, or the federal Marine Mammal Protection Act, or species that are candidates for listing under the California Endangered Species Act, unless the

Mr. Brian Wiese May 30, 2008 Page 3

project applicant has obtained the appropriate "take" authorization from the U.S. Fish and Wildlife Service, National Marine Fisheries Service or the California Department of Fish and Game...give appropriate consideration to the recommendations of the California Department of Fish and Game, the National Marine Fisheries Service or the United States Fish and Wildlife Service in order to avoid possible adverse effects of a proposed project on fish, other aquatic organisms and wildlife habitat."

The DEIR should evaluate any potential impacts to fish or other aquatic organisms and wildlife consistent BCDC's policies.

Appearance Design and Scenic Views. The Bay Plan policies on appearance design and scenic views state, in part that, "views of the Bay from vista points and from roads should be maintained by appropriate arrangements and heights of all developments and landscaping between the view areas and the water. In this regard, particular attention should be given to all waterfront locations, areas below vista points, and areas along roads that provide good views of the Bay for travelers, particularly areas below roads coming over ridges and providing a "first view" of the Bay (shown in Bay Plan Map No. 8, Natural Resources of the Bay)...vista points should be provided in the general locations indicated in the Plan maps. Access to vista points should be provided by walkways, trails, or other appropriate means and connect to the nearest public thoroughfare where parking or public transportation is available. In some cases, exhibits, museums, or markers would be desirable at vista points to explain the value or importance of the areas being viewed."

The NOP indicates that views of the fuel reduction and vegetation management activities may be available from public roads and highways. The DEIR should investigate any potential impacts to scenic views in accordance with Bay Plan policies.

Thank you for your consideration of these comments. If you have any questions regarding this letter, or any other matter, please do not hesitate to phone me at (415) 352-3647, or email adamp@bcdc.ca.gov.

Sincerely,

ADAM PARRIS

Coastal Program Analyst

AP/gg



California Native Plant Society

East Bay Chapter Conservation Committee

May 21, 2008

Brian Wiese East Bay Regional Park District 2950 Peralta Oaks Ct. Oakland, CA 94605

RE: Notice of Preparation for Environmental Impact Report (EIR) – East Bay Hills Wildfire Hazard Reduction and Resource Management Plan

The East Bay Chapter of the California Native Plant Society (EBCNPS) has a long and rich history in the Berkeley/Oakland hills (Berkeley hills¹). Our statewide organization was first formed here in the East Bay nearly 47 years ago, and continues to work in these hills collecting plant distribution information, helping local city governments develop sensitive fuels management plans, restoring habitat, helping focus awareness on and list rare plant species, and other educational and horticultural activities. EBCNPS is encouraged by the open and informative process that the EBRPD has initiated for creating a sustainable and effective fuels management plan. We hope that the dialogue will continue through the implementation process. The following are concerns and issues that we hope will be addressed in the upcoming EIR:

- 1. The conceptual plan laid out at the May 7th, 2008 meeting will require an enormous amount of collaboration and leadership. We imagine such a large-scale effort will require oversight and coordination by a full-time, trained natural resources professional. Given the work load of current employees, how will the EBRPD organize their efforts to ensure that the proposed plan is well executed and effectively monitored? Will the EBRPD hire a new full-time employee with associated staff and corresponding appropriate authority to implement this plan? How will separate departments such as Fire and Stewardship coordinate in support of the goals of maintaining native flora, including healthy plant communities?
- 2. Although there are a host of rare plants listed as endangered and threatened in the Oakland/Berkeley hills (Berkeley hills), much of the biological diversity of our area is maintained in the palate of native plants that are *locally* rare. Will the EBRPD provide special protections to locally rare and unusual plants of the Berkeley hills, as recorded in Dianne Lake's *Rare and Unusual Plants of the East Bay*?
- 3. Is native plant restoration an explicit goal of this process? Fuels management requires a strategy for addressing native flora, weed management, park aesthetics, and species management goals; we hope the nexus between all values and goals will be promulgated in the Plan and EIR.

¹ Geologically, the expanse of hills from Richmond to Castro Valley were historically labeled as the Berkeley hills. This moniker is used in this document based on this geological origin.

EBCNPS Conservation Committee

- 4. Sudden Oak Death (SOD), caused by the pathogen *Phytopthora ramorum*, has become more prevalent in the East Bay in the last few years, with one recent introduction in Redwood Regional Park² (one of the proposed management areas). Additionally, the pathogen is thought to be evolving³ unique genotypes in newly infested areas. Please address mitigation for the potential spread of this pathogen, which has decimated landscapes throughout California. How will such a mitigation plan be structured? Will there be a "cease and desist" option in the plan if there is an unacceptable spread of the SOD pathogen due to fuels management activities? What "best management practices" will be used regarding SOD?
- 5. An additional pathogen, *Phytopthora cinnamomi*, found on the federally listed pallid manzanita, *Arctostaphylos pallida*, is a serious threat to the persistence of the population of this rare plant, which is known to persist solely within the EBRPD treatment boundaries. Information was sent to the consultant, LSA Associates via email in early May, 2008⁴.
- 6. Northern coastal scrub is one of the dominant native plant communities in the East Bay Hills which has been targeted for fuels management. Disturbance of this plant community results in weed invasion and type conversion to annual grasses, invasive shrubs, and other flashy fuels of less quality for habitat. How will the EIR address a net type conversion of habitat from one Holland type to another, e.g. northern coastal scrub to annual grassland? Is there a goal of maintaining some semblance of vegetation types currently present, or attempting to recover proportions to another reference point? Will the EIR address both the practical aspect and logistics of attempting to maintain native flora given the reality of disturbed environments and will it address alternatives to type conversion?
- 7. It is often the case that the mitigation and monitoring reporting plan (MMRP) is incomplete at the time of the EIR approval. In maintaining the intent of CEQA review, will the EBRPD have the MMRP complete for review at the time of the EIR review?
- 8. Since many EBRPD potential fuel management areas are near private residences, how will various landowner interests be balanced as fuels management work ensues? Will a program be created for engaging local homeowners and resolving potential conflicts? What methods will be available to residents and other entities to communicate concerns, and how will those concerns be effectively heard and resolved?
- 9. Since a programmatic EIR is being developed, how will the Park District let the Board of Directors know about and review the annual work plan? What role will the Board have in guiding, approving, or commenting on the execution of the annual work plan? When will this work plan be ready for review?

http://kellylab.berkeley.edu/SODmonitoring/maps/PDF/RedwoodRegParkVicinity02-15-08page.pdf
 California Oak Mortality Task Force, 2008. Press Release 4.16.2008 for *Molecular Ecology* article. www.suddenoakdeath.org.

⁴ Please see http://www.apsnet.org/pd/searchnotes/2003/0911-02n.asp for more information.

EBCNPS Conservation Committee

Thank you for your time and consideration of our comments. Please contact me with any questions.

Sincerely,

77

Lech Naumovich
Conservation Analyst
California Native Plant Society
East Bay Chapter
conservation@ebcnps.org
510.734.0335

CC:
Afton Crooks, Sierra Club
Martin Holden, Claremont Canyon Conservancy
Mary Ann Showers, Dept. of Fish and Game
EBRPD Board of Directors



San Francisco Bay Chapter Serving Alameda, Contra Costa, Marin and San Francisco Counties

Reply to: 802 Balra Drive, El Cerrito, CA 94530 May 22, 2008

Brian Wiese, Chief of Planning and Stewardship East Bay Regional Park District Box 5381 Oakland, CA 94605

Re: Wildfire Hazard Reduction and Resource Management Plan Initial Study

Dear Mr. Wiese:

The Sierra Club has reviewed the Initial Study and applauds the Park District in its efforts so far in dealing with the issue of resource management and vegetation management for fire control. The Sierra Club makes the following comments for the purpose of improving a document and program that it in many ways excellent, but nevertheless could use some fine tuning.

First, the project description does not fully or accurately describe the project as it should be characterized and as the Sierra Club believes it was supposed to be. The project's focus was to be on both Vegetation Management for fire control purposes and Resource Management for the purpose of restoring and enhancing native habitat. The two were to be complementary goals operating in an integrated manner to create a program that produced a lower risk of fire in the area identified while also providing a return or improvement to habitat that produced a major removal or elimination of exotic plant species and a restoration of native habitat. The project as characterized in the report places the emphasis on fire control with the resource management component secondary to fire control and makes no reference at all to restoration of native habitats in the project area.

The Sierra Club is concerned that without a project description that clearly states that both resource management and fire control are equal in importance, the project will result in emphasizing ire control practices that may have significant adverse environmental impacts or which do not promote sound resource management over

practices that put the two goals in a complementary position. The Sierra Club believes that sound resource management is actually one of the best fire control practices because resource management promotes, or should promote habitat that is native in character and thus less prone to fire risk ignition and also less likely to produce high heat intensity fires that are harder to contain and stop. Thus, the project description should be recharacterized as noted above to reflect the equal and complementary nature of vegetation control and resource management.

Second, The Sierra Club certainly recognizes that one can engage in discussions about what is or is not a "native." This can devolve into a debate similar to the one about how many angels can fit on the head of a pin. But in the Sierra Club's experience on this issue, the way that discussion usually resolves is by identifying what people clearly consider exotic and undesirable from a fire and habitat standpoint. The project description should discuss the goal of native habitat restoration in a way that promotes a method for sound resource management so methods for achieving that goal can be evaluated.

Third, regardless of what is characterized as "native," an equally important issue to create habitat that is not single species or a mono-culture environment such as a concentrated area of broom or eucalyptus, Again, the project description should identify this aspect of resource management a goal.

Fourth, the Sierra Club reiterates its concern that this EIR not identify "preferred" alternatives, but instead evaluates all reasonable alternatives equally in a mosaic evaluation so that the decision maker and public understand how each approach will work to deal with fire control, promote or negatively impact resource management, and either provide beneficial environmental impacts or create significant adverse ones. In this regard the EIR should focus as much on what the beneficial environmental impacts will be as on the adverse ones.

Fifth, the EIR needs to address how each fire control measure will affect or be affected by global warming and increase or lessen global warming. The Park District proposes a long range plan that should last well into the next century. Therefore, it needs to deal as best it can with the issue of global warming.

Sincerely yours,

Signed Norman La Force, Chair East Bay Public Lands Committee First point: This "initial study" is an inventory of potential environmental impacts, but it does not define the actual mitigation techniques that are being proposed. It does not even discuss alternatives in any detail, so for those of us who want to know what specific techniques will be employed, the study is still almost too preliminary to comment on. I am concerned that the next step in this fire management plan will be a specification of mitigation techniques that will pre-empt our opportunity to comment.

Second point: In the Project Description, your intent is to "reduce the likelihood of a catastrophic wind-driven fire" but then you go on to discuss fuel management as if quantity of fuel is the primary issue for mitigation. We have heard and read Dr Jon Keeley's research that clearly defines the different characteristics between wind-driven fires (or climate-driven fires) and fuel-driven fires. In fuel-driven fires, the type and quantity of fuel is important – and that is what your study seems to be getting ready to address. But I agree with your initial statement – that the catastrophic wind-driven fire is what we fear most – and Dr Keeley's research demonstrates that the type and quantity of fuel is not critical – that a wind-driven fire will burn over areas where the fuel was already burned just a couple of years before. Therefore effective mitigation of the climate-driven fire must address issues beyond reduction or management of fuel load.

So I would hope to see the study address training and equipping fire crews for conflagrations, streamlined response and mutual aid, undergrounding of wires, closing off certain roads on red-flag days, well-publicized plans for fire access and neighborhood evacuation, zoning and building codes in the wildland interface, and so on. Concerning both types of fires, but climate-driven fires especially, the study should pay far more attention to ignition, or ignition-prevention, recognizing that most of our wildland interface fires are human-caused.

Third point: I take note again that the only species mentioned by name in this initial study is eucalyptus. And again I take exception to this apparent assumption, at least if we are talking about the trees themselves, as opposed to the litter underneath them. The experts we have consulted identify the eucalyptus as – like the redwood – inherently fire-resistant. EBRPD's literature, which implies that eucs are a problem, specifically excludes the standing trees, but addresses only the litter at their base. Emphirically, the Mountain Boulevard fire of two years ago demonstrated that although the 6 to 8' high brush and litter burned furiously, the eucs themselves, including low-hanging leaves, refused to ignite. Even in the '91 fire, mature eucs survived where everything else around them burned. In the hills, we are fortunate to have stands of eucalyptus approaching a hundred years old that provide a fine canopy that capture moisture from the fogs that sweep up our canyons, and shade the understory, maintaining a long-term, fire-resistant environment.

The Foresters we have consulted identify "high hazard fuels" – the fuel most likely to ignite, to burn furiously, and create a ladder to the crowns of the trees – as the 0-3" material on or near the ground. It seems obvious to us that wildfire hazard reduction – in terms of fuel – should be based on with removal of that material, possibly some thinning, and maintenance of the canopy.

At the last public meeting here, as I was leaving, after I had made my pitch in favor of the eucalyptus, John Sutter came over to me and said: "It seems the crowd here is divided into eucophiles and eucophobes." Yes I guess John is correct, but the thing I would like to stress is that all of us here have a fundamental agreement: We want to prevent — or at least mitigate — recurrence of the devastating conflagrations that are the natural result of the urban-wildland interface, so we need to continue to focus on the real issues, not the irrational phobias.

Additional points:

Trees are allies in terms of global warming
Removal of the trees involves heavy equipment that compresses the soil
Removal of trees dries out the understory and soil, and encourages weeds
Removal of the trees impacts native wildlife
Removal of trees encourages erosion
Poisoning of the stumps pollutes the area and storm drainage
Existing forests provide a windbreak for wind-driven fires
Existing forests are a cultural and aesthetic resource for the community
"Non-native" is a nonsense term; all flora and fauna is fundamentally non-native; the environment is a dynamic, constantly changing mix (Redwoods are non-native)
Any plan for wildfire mitigation and resource management ought to include new planting What is the next step? When?? Will there be response opportunity for public?

attn: Brean Wiese

> East Bay Regional Parks District managers,

We are writing to express our concerns about the maintenance of
 Tilden Fire Break that runs parallel to Summit Road. We understand
 that the Park District is willing to use a variety of methods for
 fire fuel reduction including controlled burns, manual labor and
 goats.

> We are well aware that the goats eat indiscriminately, Bill
> McClung, who advised your department several years ago, said that
> the poison oak, which the goats also ate, provided a safe haven for
> the local bird population. Our observation is that the birds also
> live quite happily in the thickets of coyote brush
> near where the poison oak grows, and the poison oak seems to come
> back every year regardless of how 'abused' it is in the p rior year.
> Additionally, those of us who have dogs or pet our neighbor's dogs

> have never been bothered when the dogs rummage around in the coyote > brush, but at least one of us has ended up in the hospital with a

> violent reaction to poison oak.

> Another of Bill's main concerns was the proliferation of the

euphorbia 'forest' that has grown between the lower and upper
 trails parallel to Summit Road and Golf Course Road. He said that
 the goats deposit their droppings from the plants - including
 euphorbia - they have eaten elsewhere, creating a fertile ground

> for the seeds of those plants to sprout anew. He explained that

> when auphorbia dries out it create a highly

flammable ladder up the hill leading to the houses on Summit Road.
 However, one of the main causes of this euphorbia overgrowth is
 simply that the District does not send out the crews in time t o cut
 them down before they go to seed. It seemed that last year the Park
 brought in laborers much later than in prior years.

> We would hope that the District managers would pay attention to the

> fire threat level sooner rather than later.

> Those of us who walk our dogs along the fuel break have spent a
> small fortune in veterinary bills when the overgrown foxtalls find
> their way into our animals ears and noses causing them tremendous
> distress. Taking the weeds down sooner would virtually eliminate
> this nightmare. There is also a huge field of non-native Italian
> Thistle that has not been touched since the tast time goats were
> brought in to graze in the area. It is also spreading rapidly

> throughout the fuel break, ripping at our ankles and legs when we

> walk the area in the spring and summer.

> Our other concern is that the laborers the Park District engages to > do the weed whacking are as indiscriminate as the goals, but at

Thursday, May 08, 2008 AOL: EFMUSSEN

they grows high

> least the goats eat what they take down. Several of us have nearly > slipped and failen on the trail after the weed-whacking was done in > the park. The laborers leave swaths of slippery, dry, straw-like > grass covering all the trails between the upper and lower trails. > One of our neighbors in his 80's actually slipped and fell on the > trail after the weed-whacking crew had come through.

We see no reason why we can't engage a combination of methods in
 our area. We can certainly have some TRAINED (and we emphasize that
 strongly) laborers to take down by hand the euphorbia on that steep
 hill between the two trails, and we can bring in the goats to take
 down the areas on the upper and lower trails in specifically
 delineated areas.

> We believe the Park would find the cost le se expensive than a > lawsuit for broken bones and hospital stays when one of our many > alderly local residents who walk those trails regularly slips on > the trail.

As homeowners, we can only do so much to keep the areas around our
 homes fire safe. The Park has to act in a timely fashion too. We
 look forward to your rapid action on this matter.

120 Hill Rd K

Tilden Fuel Break Neighborhood

>

From: Jhengbeck@aol.com

Subject: comment on East Bay Hills Wildfire Hazard Plan

Date: May 9, 2008 12:39:04 PM PDT To: cmiller@amphiondesign.com

Hello Cheryl Miller,

The plan seems to be coming along very nicely. And I think you did a great job of orchestrating the staff presentation and the ensuing question and answer period. I have one suggestion:

The public should be given opportunities to review "site-specific fuel reduction action plans" once they are developed and before they are implemented. A public notice mechanism of some kind should be built into the overall program in order to assure concerned groups and individuals that it will be possible for them to know which treatment measures are proposed for a given site before it is too late to comment on those measures. Periodic notice to the District's board of directors regarding upcoming "site-specific fuel reduction action plans" is probably the simplest and most reliable way to accomplish this objective.

Best regards, Joe Engbeck 510/841-0339

Wondering what's for Dinner Tonight? Get new twists on family favorites at AOL Food. (http://food.aol.com/dinner-tonight?NCID=aolfod00030000000001)

Page 1 of 2

FAX

May 9, 2008

TO: East Bay Regional Parks District managers Attention: Brian Wiese (510) 635-3478

FR: Jane B. Reece and Paul P. Ossa (510) 649-7174

East Bay Regional Parks District managers,

We are writing to express our concerns about the maintenance of Tilden Fire Break that runs parallel to Summit Road. We understand that the Park District is willing to use a variety of methods for fire fuel reduction including controlled burns, manual labor and goats.

We are well aware that the goats eat indiscriminately. Bill McClung, who advised your department several years ago, said that the poison oak, which the goats also ate, provided a safe haven for the local bird population. Our observation is that the birds also live quite happily in the thickets of coyote brush near where the poison oak grows, and the poison oak seems to come back every year regardless of how 'abused' it is in the prior year. Additionally, those of us who have dogs or pet our neighbor's dogs have never been bothered when the dogs rummage around in the coyote brush, but at least one of us has ended up in the hospital with a violent reaction to poison oak.

Another of Bill's main concerns was the proliferation of the euphorbia 'forest' that has grown between the lower and upper trails parallel to Summit Road and Golf Course Road. He said that the goats deposit their droppings from the plants—including euphorbia—they have eaten elsewhere, creating a fertile ground for the seeds of those plants to sprout anew. He explained that when euphorbia dries out it create a highly flammable ladder up the hill leading to the houses on Summit Road. However, one of the main causes of this euphorbia overgrowth is simply that the District does not send out the crews in time to cut them down before they go to seed. It seemed that last year the Park brought in laborers much later than in prior years. We would hope that the District managers would pay attention to the fire threat level sooner rather than later.

Those of us who walk our dogs along the fuel break have spent a small fortune in veterinary bills when the overgrown foxtails find their way into our animals ears and noses causing them tremendous distress. Taking the weeds down sooner would virtually eliminate this nightmare. There is also a huge field of non-native Italian Thistle that has not been touched since the last time goats were brought in to graze in the area. It is also spreading rapidly throughout the fuel break, ripping at our ankles and legs when we walk the area in the spring and summer.

Our other concern is that the laborers the Park District engages to do the weed whacking are as indiscriminate as the goats, but atleast the goats eat what they

Page 2 of 2

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We see no reason why we can't engage a combination of methods in our area. We can certainly have some *trained* (and we emphasize that strongly) laborers to take down by hand the euphorbia on that steep hill between the two trails, and we can bring in the goats to take down the areas on the upper and lower trails in specifically delineated areas.

We believe the Park would find the cost less expensive than a lawsuit for broken bones and hospital stays when one of our many elderly local residents who walk those trails regularly slips on the trail.

As homeowners, we can only do so much to keep the areas around our homes fire safe. The Park has to act in a timely fashion too. We look forward to your rapid action on this matter.

Yours truly,

Jane B. Reece and Paul P. Ossa

9 Ajax Place, Berkeley, CA 94708

Tilden Fuel Break Neighborhood

Andrew Thomas

From:

JKent58@aol.com

Sent:

Thursday, May 22, 2008 5:54 AM

To:

Brian Wiese

Subject: FYI

Hi Brian,

This is a paragraph from an e-mall sent by David Tam to several Sierra Club folks in support of Norman's scoping letter. I have also heard Michelle Miller say that she was infected by pesticideds at Redwood, but I was never able to trace her claim back to an actual District use of a pesticide. Nancy knows Michelle from the city of Oakland's attempt to use pesticides in its vegetation management program, which has been held up for lack of an EIR. We should expect David to bring out the environmentally hazardous folks during the District EIR process.

"I mentioned to Afton (who hadn't seen it) and Larry my ongoing concern for the 16% of California populations who are chemically sensitive. I do not consider EBRPD to be acting responsibly toward such human users of the Hill Park system. As you will recall, one of them, Michelle Miller (338-0099), became permanently vulnerable after running through a pesticided area in Redwood (I think) RP around 2001. Prior to that incident, she had been in robust good health. I am going to network this issue to her and seven other members of a Bay Chapter Environmentally Hazardous Substances Subcommittee I proposed forming so disingenuously labeled as a Toxic Materials Task Force by one of the chapter misleaders three years ago."

Cheers, JKent

Get trade secrets for amazing burgers. Watch "Cooking with Tyler Florence" on AOL Food. (http://food.aol.com/tyler-florence?video=4&?NCID=aolfod0003000000002)

Attn: Brian Wiese EB Regional Parks

May 15, 2008

Dear Brian,

Thank you so much for getting the weed-whacking crews to cut the over-grown and dead grasses in the area of Tilden Park that borders our Summit Road neighborhood.

As you know the entire neighborhood had been very anxious to get this weed-whacking done as our homes immediately border the park area. As the weather warms we get a lot of out-of-neighborhood people who come to the park in the evening to hang out, enjoy the views while drinking and smoking whatever. With the unusually high temperatures expected this week and increased fire danger, the weed-whacking was extremely timely.

I know all the other neighbors appreciate your attention to this matter, but I don't know how many will take the time to thank you. So on behalf of myself and our other neighbors along Summit Road, Hill Road, Ajax and Atlas Roads..."THANK YOU!"

Sincerely,

Olga Orloff 1415 Summit Road Berkeley, CA, 94708 May 14, 2008

Mr. Brian Wiese EBRPD VIA FAX: 510-635-3478



RE: Dry grass and brush clearing at west side of Tilden Park near Summit Road, EBMUD Water Tanks.

Dear Mr. Wiese,

We appreciate the jobs well done by EBRPD to maintain the beauty of Tilden Park and all your other parks, the trails, managing everything, it is challenging but for the most part I think you and your teams do a very good job.

Regarding the annual dry grass and brush clearing adjacent to the residential neighborhood of Berkeley at the 1300-1400 blocks of Summit Road and also Ajax Place, I would like to add my support to my other neighbors in urging EBRPD to immediately schedule the cutting down and removal of all the dried grass and brush along the trails on the ridge.

Due to the lack of rain these past few months, the grass is already dry, and while your crews have usually come around in May in the past, I hope you can get them up here right away before anything bad happens.

I liked the manual clearing by the teams of humans you had the past three years as they had managed to keep native plants intact while removing the invaders. I do not like the goats because they leave a lot of excrement and they also spread the weed seeds around worse than before.

I can show you in the park land across from my home how I have eliminated the Italian Thistle in this region by manual removal over the past three years. There are also a lot of wildflowers and some native grass here.

Thank you for your consideration and prompt attention to this matter.

Sincerely, Steve Beck 1350 Summit Road 510-843-4270 <u>sbeck123@aol.com</u>

Berkeley CA 94708

cc: Summit/Ajax/Atlas Neighborhood Association, Trudy Washburn

PS there continues to be a lot of motor vehicles illegally parking on EBMUD land on Grizzly Peak Blvd just south of Golf Course Road, despite the NO PARKING April 15 to November 15 signs. These cars are a serious public safety hazard because the hot catalytic converters on the underside of the motor vehicles can, and have in the past, ignited the dry grass and started fires. I have called both the Oakland Police and the UC

5/14/08 TT WAS DONE- 1

East Bay Regional Parks District managers and Tilden Fire Department,

We are writing to express our concerns about the maintenance of Tilden Fire Break that runs parallel to Summit Road. We understand that the Park District is willing to use a variety of methods for fire fuel reduction including controlled burns, manual labor and goats.

Bill McClung, who advised your department several years ago, said that the poison oak, which the goats also ate, provided a safe haven for the local bird population and that their droppings spread seeds to other areas, including the euphorbia 'ladder' that extends from the lower trail to the upper, and near our homes. He added that the goats eat indiscriminately.

Here are our concerns and responses:

- 1) We observe that the birds also live quite happily in the thickets of coyote brush near where the poison oak grows, and the poison oak seems to come back every year regardless of how 'abused' it is in the prior year. Also our dogs don't bring back poison oak to the neighborhood (which sent one neighbor to the hospital).
- 2) One of the main causes of the euphorbia overgrowth is simply that the District does not send out the crews in time to cut them down before they go to seed, it seemed that last year the Park brought in laborers much later than in prior years. We would hope that the District managers would pay attention to the fire threat level sconer rather than later.
- 3) The laborers the Park District engages to do the weed whacking are as indiscriminate as the goats, but at least the goats eat what they take down. The weed whackers leave vast swaths of slippery straw-like grass spread across the paths and trails. Several of us have nearly slipped and fallen on the trail after the weed-whacking was done in the park, and one 80-year old neighbor actually did fall. Fortunately he did not break any bones that time.
- 4) The spiky non-native Italian thistle has grown dramatically throughout the areas since the goats are no longer used. These unwanted plants rip at our legs and ankles when we walk the trails. In fact, there's an entire field of them where the Park has stopped managing the fuel break at all.
- 5) Those of us who walk our dogs along the fuel break have spent a small fortune in veterinary bills when the overgrown foxtails find their way into our animals ears and noses causing them tremendous distress. Bringing in the goats BEFORE the foxtails mature would go a long way to preventing this problem.

We see no reason why we can't bring in the goats to take down the areas on the upper and lower trails in specifically delineated areas. We believe the Park would find the cost less expensive than a lawsuit for broken bones and hospital stays when one of our many elderly local residents who walk those trails regularly slips on the trail.

As homeowners, we can only do so much to keep the areas around our homes fire safe. The Park has to act in a timely fashion too. We look forward to your rapid action on this matter.

(Name) Uga Orloff (address)	1415 Summit Road Berkeley
Tilden Fuel Break Neighborhood	Berkeley
Please give your signed copy, or email to one of the following nei	dhbors:
Trudy Washburn Trudwybrn@aol.com	1 La Brien Wiest
Colette Denton xcolette@pacbell.net	Faxed to Brian Kliese EB Regional Parks
Claire Stone clairst9@aol.com	26 Regional Parks
Our thanks to Andrea Pilaumer for writing this letter.	510 635-3478

Comment Card for East Bay Hills Wildfire Hazard Reduction and Resource Managment Plan and EIR May 17, 2008 Meeting LDWARD BENNETT Name: Address: 1719 MARIN AUG BERYELY, 94708 Phone Number/ email: 526-1260 Comment: CONCERN ABOUT HOW BALANCE Please continue any written comments on back of card

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GEOFFREY CARTER

Address:

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Phone Number/email: 510-568-58/2

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EAST BAY REGIONAL PARK DISTRICT

East Bay Hills Wildfire Hazard Reduction
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Comment Card for May 17, 2008 Meeting

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	2109 Eunice St. Redely CA 94709
	berlemail: 558-1992 margitrous collins@comcast.net
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East Bay Hills Wildfire Hazard Reduction and Resource Managment Plan and EIR	May 17, 2008 Meeting
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EAST BAY REGIONAL PARK DISTRICT

East Bay Hills Wildfire Hazard Reduction and Resource Managment Plan and EIR Comment Card for May 17, 2008 Meeting

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105 ARDMORE RD KENSINGTON CA 94707
Address: poterraberbeley. odn 5105268133
Phone Number/email:
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East Bay Hills Wildfire Hazard Reduction and Resource Managment Plan and EIR

JERRY BREIR - Hilly Conservation Medicals

Name:

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Phone Number/ email: (5/6) 918-1163

Comment: Speak on question of clear cutting versus Thinning and removing understory

Was any study done on fine movement their grass as confined to trees?

Who determined that lives were creating high Please continue any written comments on back of card

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EAST BAY REGIONAL PARK DISTRICT
Comment Card for East Bay Hills Wildfire Hazard Reduction May 17, 2008 Meeting and Resource Managment Plan and EIR
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Address: 40 Saddle 200k Ct Oaklad 7469
Phone Number/email: 500-580-5216(H) (Danne & Story SC)
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