



December 7, 2019

TO: Angela Robinson Pinon,
Ken Schwartz, Horizon Consulting

RE: Notice of Preparation of a Draft Environmental Impact Report for the Oakland Vegetation Management Plan

The Oakland Firesafe Council looks forward to the upcoming environmental impact report that will result in a comprehensive, scientifically-based 10-year Vegetation Management Plan (OVMP) for the Oakland wildland/urban interface. We have concerns, however, that the draft plan as it now stands does not achieve the goals set forth from the very beginning as it does not address the very real risk of crown fires ignited by flying embers that could sweep through city-owned property and wreak havoc with homes, lives and the city's long term recovery from a major wildfire.

The Environmental Impact Report (EIR) presents a real opportunity to correct this oversight. We respectfully request that the following items be incorporated into the EIR review:

1. Provide an **alternative to the standard forestry methodology** more appropriate to the densely populated wildland/urban interface of Oakland. The standard fuel models referenced in the Draft OVMP only model surface fuels and do not take into account the very real risk of crown fires or house-fire combinations which were substantive game changers in the California fires of 2017 and 2018. The forestry model is inappropriate to an urban wildland interface where residential structures with inhabitants close together add fuel and higher risk to the situation.
 - The EIR should provide an estimate of crown fire length in relation to tree height for the various vegetation types described in the plan i.e. redwood, Eucalyptus, Monterey pine & cypress, coast live oak, bay. Fire behavior suggested in Table 7 of the OVMP is not accurate for Tree/Woodland/Forests in urban/residential areas. Suggested flame lengths of 8' are deceptive for 150' tall eucalyptus, cypress, and Monterey pine trees.
 - The EIR should use this alternative approach in developing prescriptive treatments for specific parks/open spaces/properties where these conditions exist.
2. The EIR should review best practices/land management science concerning the **timing of treatment**. Timely clearance interrupts the seed cycle and creates not just more timely compliance in the current year, but also improves fire safety in future years, as the seed cycle of high fuel load invasives are interrupted. In addition, the growth cycle is interrupted while plants are smaller with early clearance, but later clearance typically means larger brush has grown and to the extent the cuttings need to be removed from the site, adding

expense. Removing some invasives, such as French and Scotch broom, by their roots prior to seeding will also improve long-term fire safety by eliminating the fire-prone vegetation in the first place. Though this has positive implications for fire safety, the environmental impact must be evaluated---both because of the erosion implications and also because of the long-term changes to the vegetation landscape.

3. The EIR should **contain best practices for maintenance** following treatment, as this is critical long-term reduction of the fuel load in the impacted areas.
 - The EIR should look at best practices and economic impact of thinning of second-growth eucalyptus and the practice of removing all but one stem on multi-stemmed trees. Complete removal of the second-growth eucalyptus should be reviewed as an alternative to avoid the issue of new sprouts forming on the groomed trees every year, adding expense and fuel to a high-risk area.
4. **Demographics:** The EIR should address the impact of a potential wildfire on the surrounding structures and populations. Most of the city-owned properties in the WUI are surrounding by neighborhoods of densely situated homes filled with people. A fire on city property impacts the ability of those residents to evacuate safely and creates real risk to life and property. The concept of a vegetation management plan for Oakland should be to create neighborhood fire breaks on city-owned property to keep small fires from starting and/or spreading to the populated neighborhoods abutting the city park/open space. This information is of utmost importance to setting priorities for implementation of the OVMP.
5. The EIR should take into consideration the **fuel load of properties adjacent to the city-owned sites**. The number of structures, which are also highly flammable, as well as the vegetative fuel load of non-city adjacent properties should be incorporated into the fuel load reduction strategies. While the purview of the OVMP is only on those properties which the City of Oakland controls, there are opportunities to create wider fuel breaks on city-owned properties to account for the greater fuel load as a whole in the neighborhood. And, of course, the OVMP itself should contain recommendations specific to each property about coordinating removal efforts with adjacent property owners.
6. The EIR should provide scientifically based justification for the use of **herbicide** when removing Eucalyptus, French broom and other fire-prone plant material that tends to multiply when cut. With the large number of second-growth Eucalyptus and large French broom needing treatment at the Sports Field, covering with plastic or having to go back year after year to cut the new growth is cost prohibitive and not as effective as treating the fresh cuts with herbicide applied in small quantities by knowledgeable, licensed contractors in accordance with current science.
7. The EIR should include recommendations for creating a more diverse ecology on city-owned properties.
 - **Geology/Soils**—Eucalyptus are extremely acidic and prohibit the growth of plants other than French Broom and poison oak. Removal of the Eucalyptus would encourage greater diversity while reducing fire risk.
 - **Agriculture and Forestry Resources**—in many situations, there is little room to create diversity among plant life because of the density of the vegetation. Furthermore, because of the types of trees currently growing, the soil conditions are not conducive to plant diversity (see above). The EIR should consider these

conditions and make recommendations for a more diverse, less fire-prone plant community.

8. The EIR should address the impact of a wildfire on:

- **Hazards and hazardous materials**--The area is riddled with poison oak, which is a hazard to hikers, first responders and to residents should a fire cause the poison oak to burn and get into the smoke and air. The issue of poison oak as a hazardous condition should be part of the analysis for each site where it is growing.
- **Air quality**—not only smoke and particulates in general, but where there is poison oak there is an additional human safety hazard. A major fire will result in spread of all kind of toxics in the air.
- **Green House Gas Emissions**—The EIR should take into account the impact of burning trees on gains made to reduce green house gas emissions. Unless we make progress on reducing the number of fire prone trees, the particulates from a fire will wipe out in one day all the progress made on reducing greenhouse gas emissions in one year.

We look forward to a thorough review of the environmental impacts of implementing a comprehensive Vegetation Management Plan for Oakland that will result in creating neighborhood fire breaks to improve first responder access, residents ability to evacuation safely, and will reduce the loss of life and property should a major wildfire occur in the Oakland hills.

Sincerely,



Susan Piper
Chair
Oakland Firesafe Council