Committee to Minimize Toxic Waste

RECEIVED
JUN 20 2013
BY:

Federal Emergency Management Agency (FEMA)
Region IX

Attn: Alessandro Amaglio
Regional Environmental Officer

P.O. Box 72379
Oakland, CA 94612-8579

June 14, 2013

Dear Mr. Amaglio,

Enclosed please find our comments on the Draft Environmental Impact Statement (EIS) for Hazardous Fire Risk Reduction, East Bay Hills, California - a proposed project.

We are resubmitting our comment letter of September 28, 2010, as comments for the above referenced Draft EIS and reiterate:

Do not fund any of the UCB (University of California, Berkeley) grant applications or any of the UCB portions of the City of Oakland grant application, totalling over a million dollars.

As stated before, UCB's 2020 Long Range Development Plan (LRDP) proposes several major development projects in the UC's Hill area's high risk fire zone. These same areas are now the subjects of the grant applications for FEMA funding.

In the fall of 2012 UC already did some clear-cutting in Strawberry Canyon, in a major landslide area, just below the Lawrence Hall of Science (See attachment 1.). No vegetation was left to hold the hillside intact, when the next rainy season arrives. The area was left as barren as a war zone, without any regard for aesthetics.

There is already 100s of 1000s of sq. ft. of new development being constructed in Strawberry Canyon, some of it privately funded - so we ask again that FEMA not fund fire protection for these privately funded commercial interests. They should and can provide the funding to protect their own enterprises.

In addition most of the proposed project areas of UCB's grant applications are in major Watershed lands, i.e. the Strawberry Creek and Claremont Canyon Watersheds (See attachment 2.) as well as in major landslide areas (See attachment 3.) criss-crossed by several earthquake faults and epicenters in Strawberry Canyon (See attachment 4.) So we request that FEMA adopt a NO ACTION ALTERNATIVE with regard to all UCB's grant applications.

Sincerely, Pamela Sihvola/CMTW
P.O. Box 9646
Berkeley, CA 94709

P. 1/11

Thinned eucalyptus (LBNL property) and clear cut eucalyptus (below LHS)

Clear cut eucalyptus grove below LHS (UC Property)

ATTACHMENT 1.

● = LHS (LAWRENCE HALL OF SCIENCE

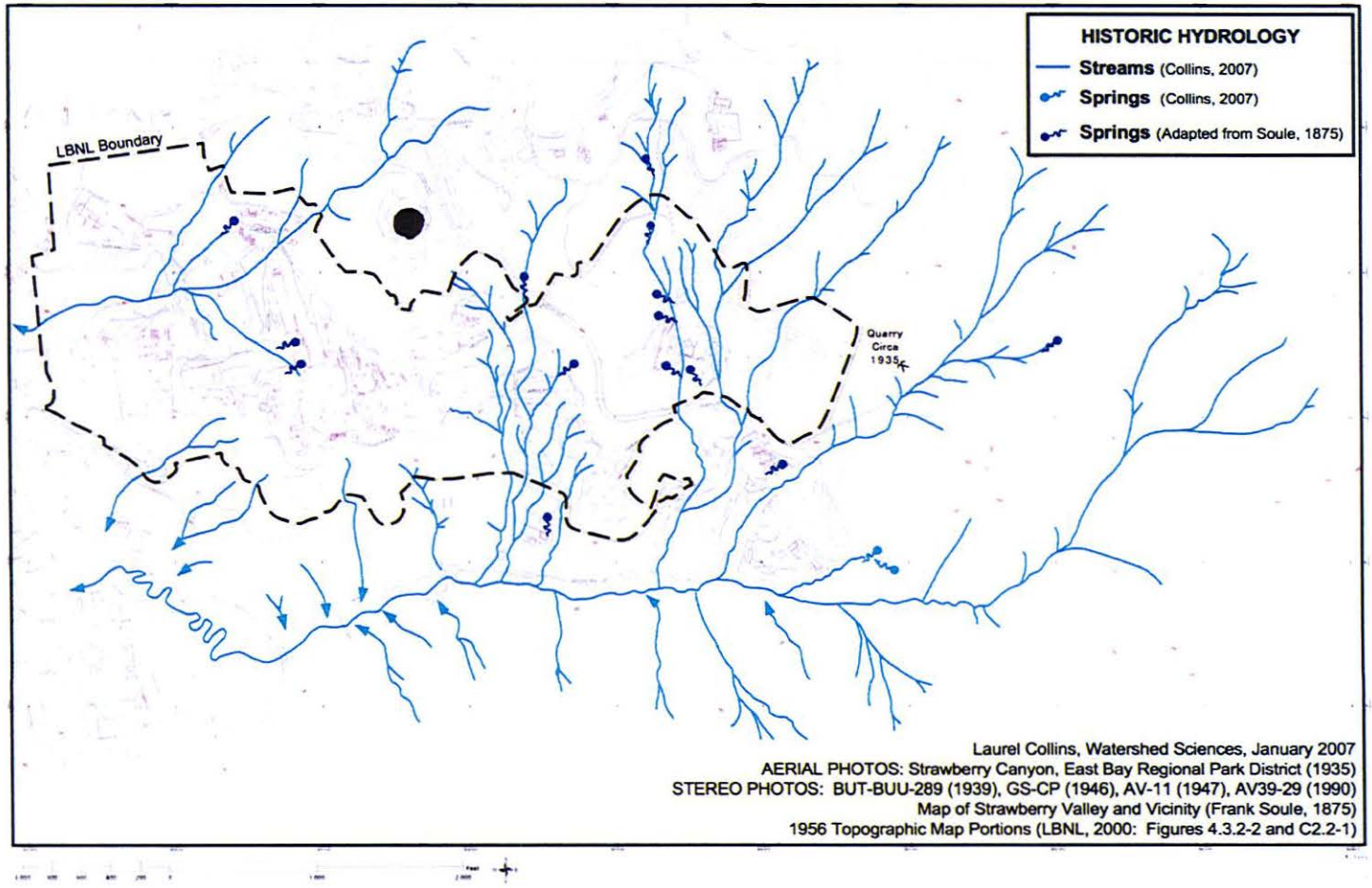

FIGURE 5. INTERPRETATION OF HISTORIC CHANNEL NETWORK AT LBNL IN STRAWBERRY CREEK WATERSHED

ATTACHMENT 2.

● = LHS (LAWRENCE HALL OF SCIENCE)

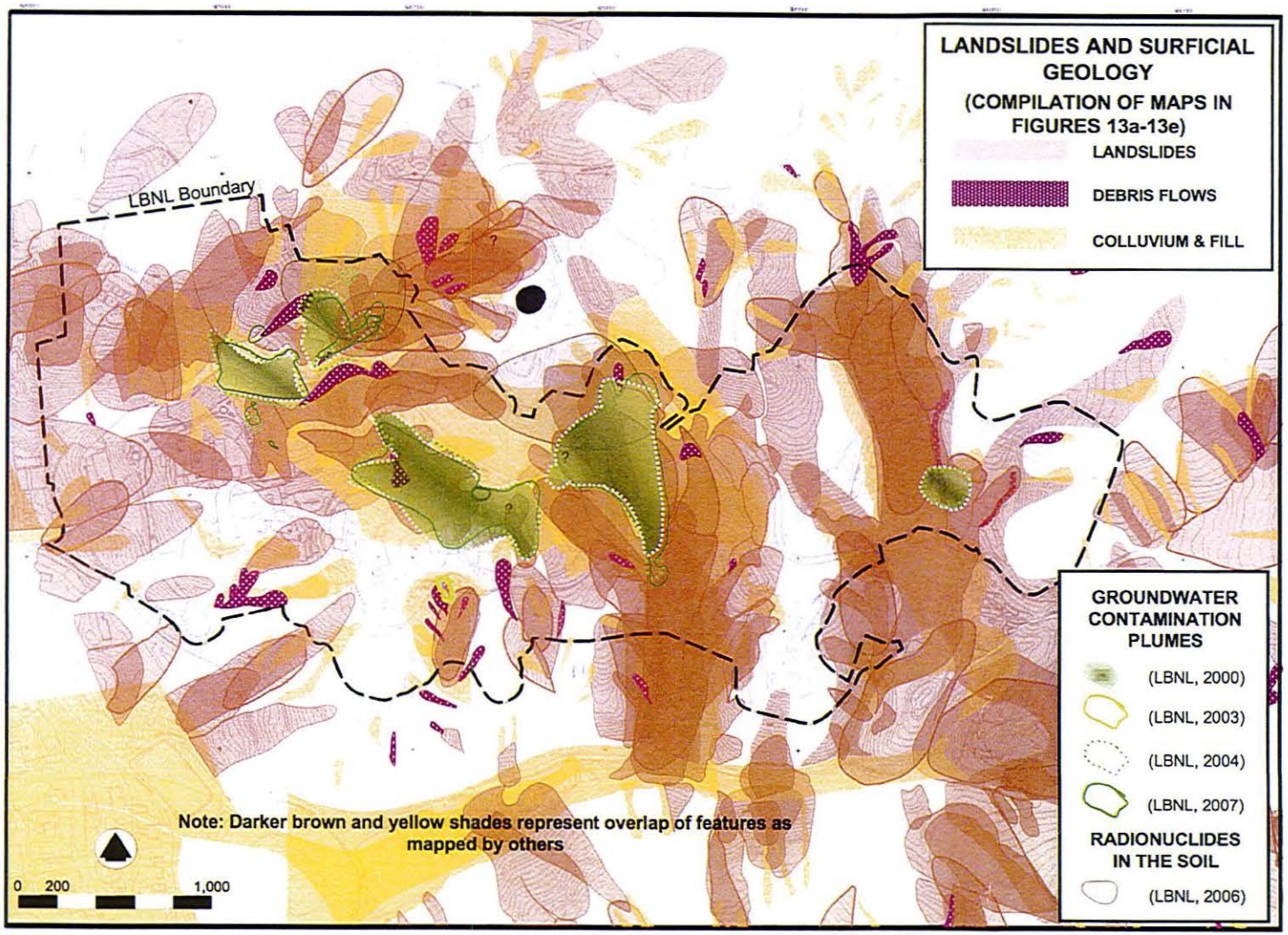

FIGURE 14. COMPILATION OF LANDSLIDE AND SURFICIAL GEOLOGY MAPS 13a-13f IN STRAWBERRY CANYON

ATTACHMENT 3.

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300_Sihvola_Pamela

● = LHS (LAWRENCE HALL OF SCIENCE)

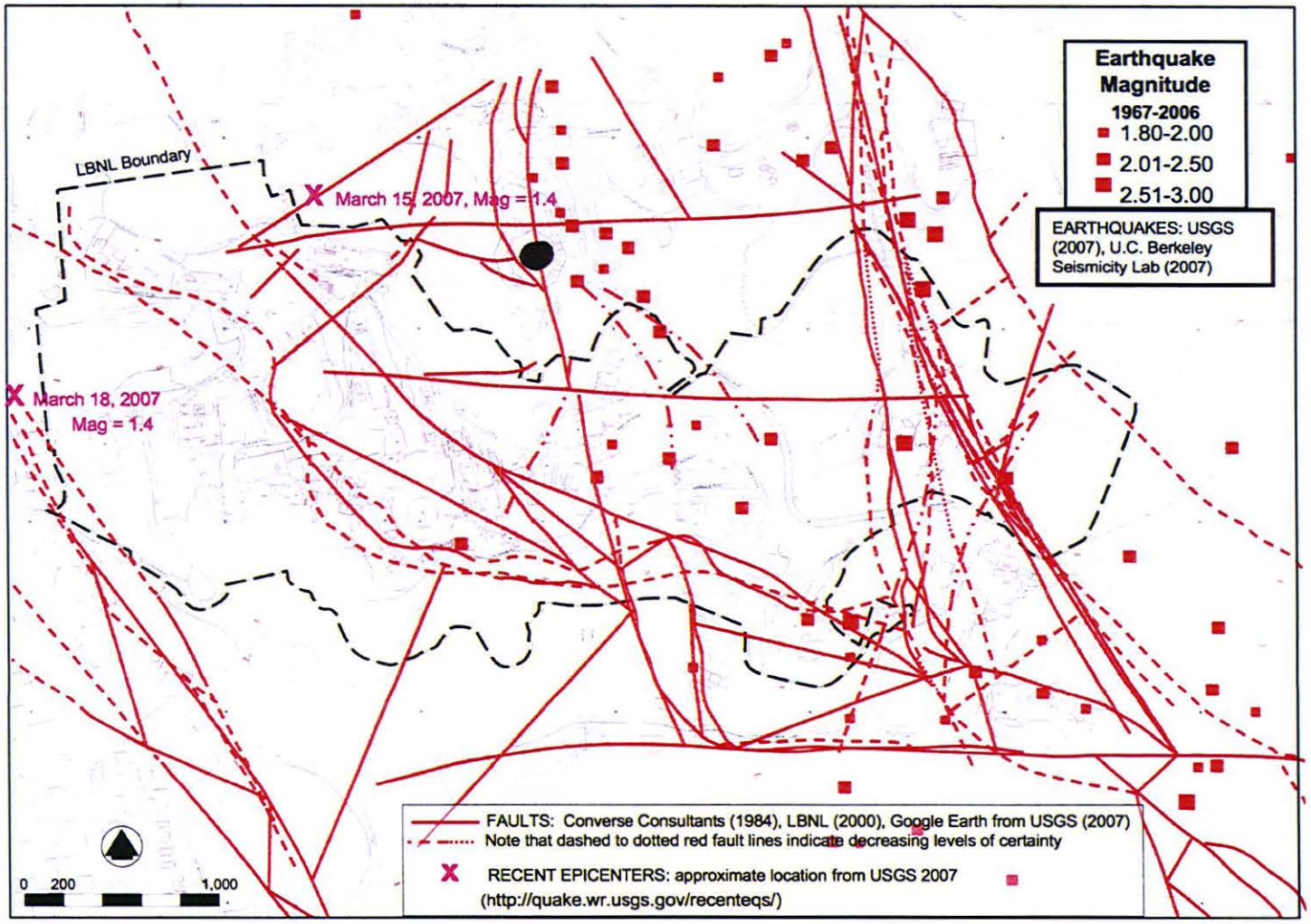

FIGURE 12a. EARTHQUAKE EPICENTERS AND FAULT COMPILATION AT LBNL IN STRAWBERRY CANYON 1967 - 2007

ATTACHMENT 4.

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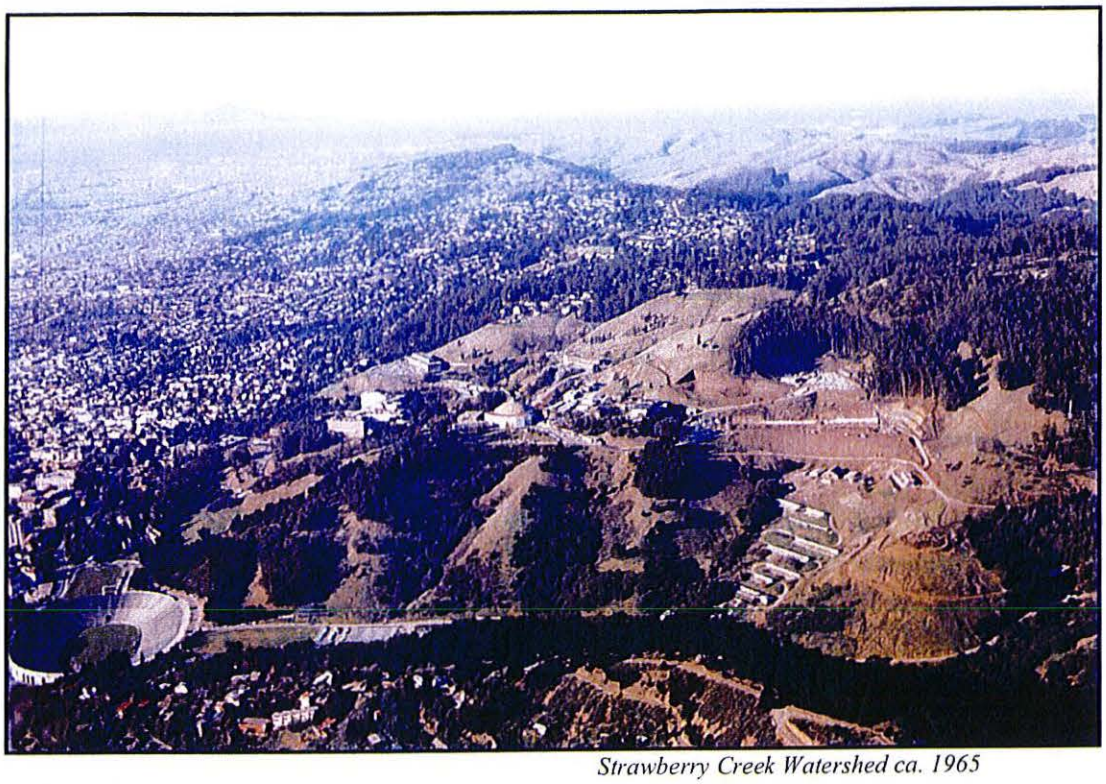
300_Sihvola_Pamela

PS. The source for maps in attachments 2-4 is a report titled: Contaminant Plumes of the Lawrence Berkeley National Laboratory and Their Interrelation to Faults, Landslides, and Streams in Strawberry Canyon, Berkeley and Oakland, California. (See attachment 5.) The report is available @ www.cmtwberkeley.org (See attachment 6.)

CONTAMINANT PLUMES OF THE LAWRENCE BERKELEY NATIONAL LABORATORY AND THEIR INTERRELATION TO FAULTS, LANDSLIDES, AND STREAMS IN STRAWBERRY CANYON, BERKELEY AND OAKLAND, CALIFORNIA

March 2007



Strawberry Creek Watershed ca. 1965

Laurel Collins, Geomorphologist
Watershed Sciences
1128 Fresno Ave
Berkeley, California 94707
collins@lmi.net

for

Pamela Sihvola, Project Manager
Committee to Minimize Toxic Waste
P.O. Box 9646
Berkeley, California 94709

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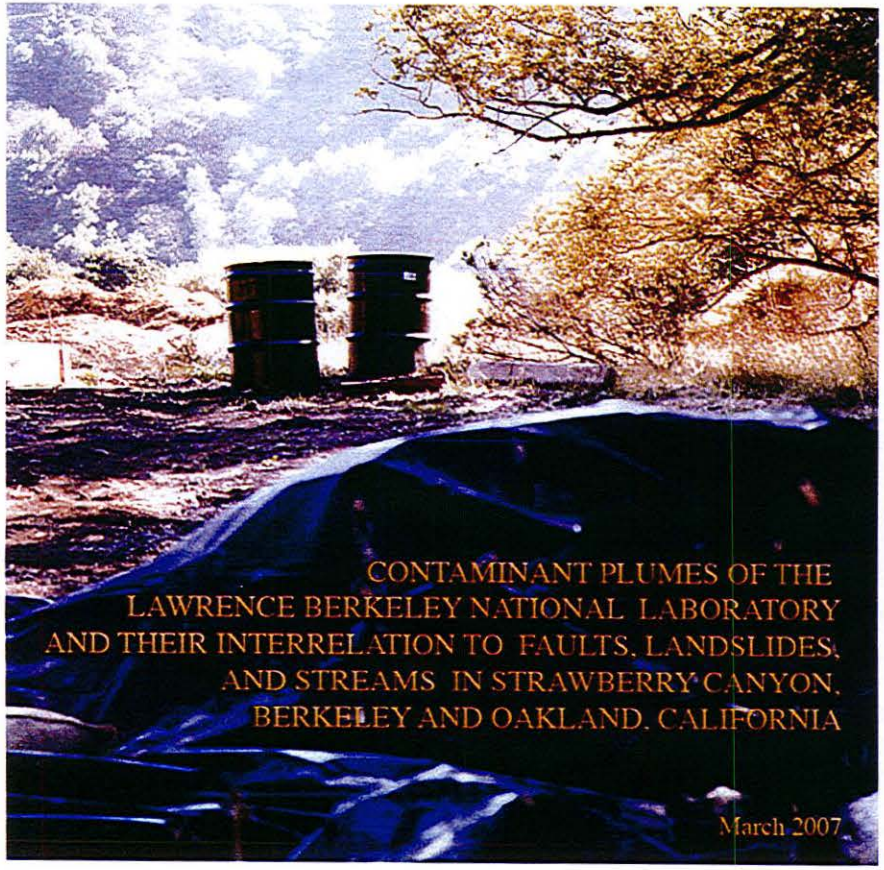
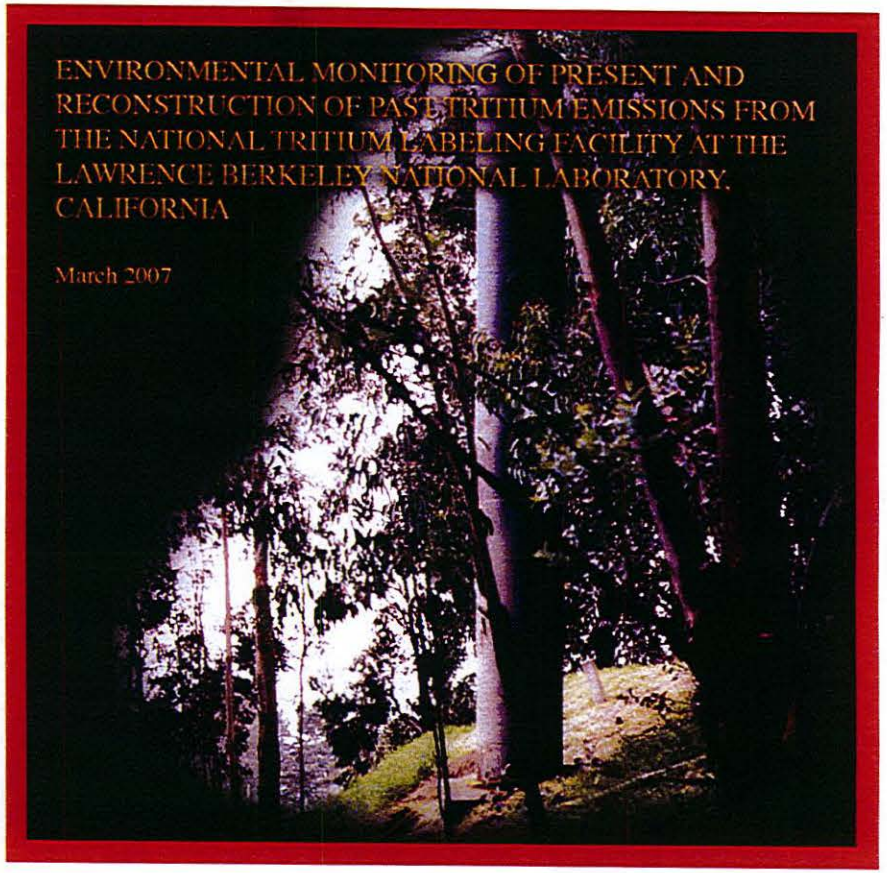
300_Sihvola_Pamela

ATTACHMENT 5.





These reports can be found on the web:
http://www.cmtwberkeley.org

or contact:
The Committee to Minimize Toxic Waste
Pamela Sihvola
P.O. Box 9646
Berkeley, California 94709

ATTACHMENT 6.

P. 8/11

URGENT

Committee to Minimize Toxic Waste

Federal Emergency Management Agency
Region IX
Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

September 28, 2010
Mailed via USPS:
to: EBH, P.O. Box 72391
Oakland, CA 94612

Attn: Mr. Alessandro Amaglio, Environmental Compliance Officer
via FAX: (510) 627-7270
Mr. David N. Kennard, H.I.R.A. Branch Chief, Mitigation Div.
via FAX: (510) 627-7147

RE: Scoping Comments on the Hazardous Fire Risk Reduction Environmental Impact Statement (EIS) East Bay Hills, California Project.

Dear Sirs,

These comments are specifically addressing 3 of the 6 components of the above referenced project, i.e.:

1. UC Berkeley (UCB), PDM-PJ-09-CA 2005-003
2. UC Berkeley (UCB), PDM-PJ-09-CA 2005-011
3. UC Berkeley (UCB), PDM-PJ-09-CA 2006-004

We are respectfully asking that you DO NOT FUND any of the 3 grant applications submitted by UC Berkeley for the following reasons:

In the UCB 2020 Long Range Development Plan (LRDP) EIR, all these 3 areas: the Northwest Promontory, Chapparal Hill and Claremont Canyon, were designated for Faculty (Family) Housing (100 units of 2,3, and 4 bedroom housing), a Campus Retreat Center for Conference Venues and continued expansion /construction of research facilities extending outward from the Silver Space Sciences Laboratory, the Mathematical Science Research Institute, the Field Station for Behavioral Research (a controversial Hyena project) etc., all along the narrow, winding Grizzly Peak Boulevard next to Tilden Regional Park to Claremont Canyon.

It is clear that UCB is intending to use FEMA funds for clearcutting these 3 areas in anticipation for future development and expansion, which is in direct opposition to the FEMA guidelines, as is the clearcutting, which the guidelines prohibit.

Continued development on the ridges of Strawberry and Claremont Canyons only increase the fuel load and FEMA should have NO part in facilitating UCB's ill-conceived plans!

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In addition, the headwater streams of both the North and South Fork of Strawberry Creek originate from the areas no. 2 and 3 (see above) of UCB's grant application. Clearcutting in these areas would create erosion, and the application of Garlon or any other herbicide must be absolutely forbidden near headwater streams!

UCB should continue the management and reduction of fire risk on their own lands with their own budgets, using goats, as has been the case in the past, eliminating tall grasses and underbrush.

All large trees should be left in place (no tree greater than 8" in diameter should be cut) so that the tree canopies can continue to prevent the growth of flammable, invasive weeds and shrubs! The spaces between large trees should be about 10 feet.

In conclusion, please DO NOT include any of the 3 UCB grant proposals in the EIS process. These funds ⟶ should be reserved in favor of other more deserving projects.

Sincerely,

Pamela Sihvola, Co-Chair
CMTW
P.O. Box 9646
Berkeley, CA 94709

PS. I am enclosing the text of a petition signed by hundreds of neighbors in 2004 fighting UCB's proposal to build 100 high-density (2, 3 and 4 bedroom) housing units in the Northwest Promontory (area 2, see above) of the current application for FEMA funds. As a result of the community opposition one section of the housing project was changed to "reserve" (for future development) and the other was changed to research (potentially for immediate development)

URGENT

SAVE SUMMIT ROAD/GRIZZLY PEAK BOULEVARD NEIGHBORHOOD FROM UC DEVELOPMENT/ENCROACHMENT

1. **STOP Further Destruction of the Upper Strawberry Creek Watershed. UC Berkeley is proposing to build 100 high-density (2,3 and 4-bedroom) housing units at the intersection of Grizzly Peak Boulevard and Centennial Drive, i.e. the cul-de-sac at the end of lower Summit Road, along Grizzly Peak Boulevard south of Centennial Drive (Site H1) and in the parking terraces across from Lawrence Hall of Science (site H2).**
2. **MAINTAIN adequate firebreak and buffer zone, ready access and egress at Grizzly Peak Boulevard and Centennial Drive, between the regional parklands, University of California property and our neighborhood – in the high-risk fire zone.**
3. **PREVENT more traffic congestion and loss of parking in our neighborhoods.**
4. **UTILIZE existing available housing, and research sites on and near campus to prevent further degradation to the community from increasing traffic gridlock, un-taxed use of city services (sewer, utilities, emergency, police and fire agencies), elimination of open space/ natural habitat.**

We, the undersigned, oppose the University of California Berkeley's 2020 Long-Range Development Plan as seriously flawed and harmful to our community safety and well being. We urge UC to work with the City of Berkeley, and its community organizations and stop further development in our neighborhoods and adopt the alternatives for expansion we have proposed in our May 24, 2004 comment letter to Jennifer Lawrence at UC's Facilities Services.

P. 11/11

300_Sihvola_Pamela

From: Laura Silberstein
To: EBH-EIS-FEMA-RIX
Subject: proposed clear cut, Berkeley Hills, re: fire hazard & native vs. non-native plants
Date: Monday, June 17, 2013 11:17:51 PM

RE:
Hazardous Fire Risk Reduction Environmental Impact Statement
East Bay Hills , California
Dated April 2013

The notion of clear-cutting entire forests, whether eucalyptus, native or non-native, is inherently destructive to the local and surrounding ecology, wildlife, & watershed. It also is moving in the wrong direction to mitigate global climate change.

Restoring an area to native habitat is a wonderful goal, but it must be done with some thought and commitment to replanting and care-taking while the native species establish in the new environment. None of this care or thought is evident in the current plan. Simply chopping, waiting and praying are not a substitute.

The use of pesticides must also be carefully monitored. It would appear that we are altogether using much too much pesticides at the moment. Cancer rates have been skyrocketing. Resistant strains are ever more present. Bee colony collapse has been pinned on pesticide use.

Frankly, we are all sick of Round-up monopolization and leaving our resources in ruins, along with the rest of Monsanto's diabolical schemes of mono-cropping, seed control, and harassing farmers. This compact with pesticides must be pursued with EXTREME CAUTION.

As for the fire danger, the following by David Maloney is quite relevant. It would appear the leaving blue gum eucalyptus in place makes the whole area much more fire SAFE than allowing native grasses to regenerate in the midst of our urban/suburban Bay Area with its highly combustible houses.

Sincerely,
Laura H. Silberstein, Ph.D, Biology
Berkeley resident 1963-1972; 2012-present

My Word: Task force report confirms trees are not primary fire hazard
By David Maloney
Posted: 07/30/2009 10:42:02 AM PDT

I retired from the Oakland Fire Department in 1988. In 1989 I began working for the Department of Defense as chief of fire prevention at the Oakland Army Base. In 1991 I was appointed to the Oakland-Berkeley Mayors' Firestorm Task Force. Our job was to investigate the causes of the 1991 Hills Fire and make recommendations to prevent its recurrence.
The Task Force Report concluded that the spread of the fire was mostly due to the

radiant heat generated by burning houses. A burning house has a sustained radiant heat transmission of 2,500-3,000 degrees. The spread of the fire was not due primarily to burning trees — eucalyptus or any other species.

The July 17 article failed to mention another crucial fact. There are two species of eucalyptus that predominate in the East Bay Hills: The blue gum, which is highly fire-resistant, and the dwarf blue gum.

The characteristics that determine the fire resistance of any tree are how high from the ground its branches begin and the thickness of the tree's bark. The blue gum has a very thick bark, enabling it to withstand fire, and its branches begin about 25 feet from the ground, — a ground fire will blow past it without catching its leaves on fire. An example of the blue gum is the copse of trees on the University of California campus close to Oxford Avenue.

The dwarf blue gum has a thick bark but its branches are low to the ground. A ground fire willtransmit relatively easily to its leaves, thereby causing the tree to burn. Many native California trees, such as oak, also have branches low to the ground.

In the late 1990s the federal government clear-cut blue gum eucalyptus from Angel Island. The eucalyptus canopies that provided shaded avenues for countless hikers and bikers were replaced by grass, brush and shrubs. In 2008 the worst fire in modern Angel Island history occurred, and consumed 400 of the island's 740 acres. It burned much of the grass, brush and shrubs that had taken the place of the clear-cut eucalyptus. Blue gum eucalyptus is a dominate species. It precludes grass, brush and shrubs from growing around it. If the blue gum eucalyptus had not been cut down, the grass, brush and shrubs could not have survived, and the fire would not have been as extensive as it was.

My experience on the task force was that many people who wanted only native California plants and trees on our hillsides seemingly deliberately ignored the facts of the major cause of the fire, and the difference between the blue gum and dwarf blue gum.

The Hills Conservation Network is correct in its support of thinning out the East Bay Hills wooded areas. It would be a waste of taxpayers' money to clear-cut the East Bay Hills of trees that are highly fire-resistant, and it could lead to another devastating fire. Because of our conclusions, new fire prevention codes relative to housing construction were promulgated by the State of California and various cities throughout California. There were no new fire codes promulgated relative to the species of trees that would populate the East Bay hills.

Laura Silberstein
lsilbers@gmail.com

From: Charmander Sky
To: EBH-EIS-FEMA-RIX
Subject: Please do not cut down Berkeley and Oakland trees!
Date: Tuesday, May 28, 2013 11:00:25 PM

I am submitting my vote AGAINST clear-cutting Berkeley and Oakland trees.
Please, and thank you! :)

http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees

http://milliontrees.me/2013/05/09/nearly-a-half-million-trees-will-be-destroyed-if-these-east-bay-projects-are-approved-revised/

From: Lorien Smyer
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction projects
Date: Friday, May 17, 2013 12:11:05 PM

While I understand the need to reduce fire hazards, I am strongly opposed to the use of herbicides. Please give strong preference to stump-grinding and the use of goats to eat the foliage. Animals and bees do not need to die from herbicides, please use less toxic methods. Thank you for reading.
Lorien Smyer
5923 Tehama Ave.
Richmond, CA 94804

From:	Phoebe Anne Thomas Sorgen
To:	EBH-EIS-FEMA-RIX
Subject:	Questions & public comment re East Bay Hill fire reduction plan to remove thousands of trees including Eucalyptus
Date:	Friday, May 17, 2013 2:08:43 PM
Importance:	High

Hello:

Please consider, and include in the record, the following public comment re East Bay Hill fire reduction plan to remove thousands of trees including Eucalyptus.

I am a Berkeley Commissioner for Disaster & Fire Safety, writing on my own behalf as a long-term resident of the Berkeley hills.

I am still researching this issue, but from what I know thusfar, I am in favor of removing highly flammable trees and shrubs, such as eucalyptus and hemlock, asap from areas that are at high risk of fires.

I am NOT in favor of using any chemical herbicides. Also, the trees and shrubs that are removed need to be replaced by non-flammable species to help prevent, erosion and other probs, and for esthetic reasons.

So many people are unemployed now. Instead of using herbicides to prevent regrowth from tree stumps, please consider hiring a cadre of unskilled laborers to regularly snip "starters" from the stumps while the starters are still thin enough to be easily clipped. They could also be equipped with small hand saws for the occasional starter that is too thick to remove with clippers. Please answer these questions asap, and consider expanding the FAQs on you website:

How many workers would re required to remove "starters" from stumps by hand before they grow thick using clippers (and occasional hand saws)?
How often would this need to be done (annually?)
How long would it take each time?
For how many years would this need to be done?
Could the Conservation Corps take this on?
Could FEMA fund this?
If multiple trees are indeed removed, could the methane from resulting decomposing wood chips be harvested as energy? Could FEMA fund that?

Sincerely,

Phoebe Sorgen of the BFUU Social Justice Committee

From: pbstark@gmail.com on behalf of Philip B. Stark
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Environmental Impact Statement
Date: Monday, May 27, 2013 8:05:45 PM

I am deeply concerned by the cursory and inadequate treatment of the risks of the herbicides that are part of the planned "mitigation."

To my knowledge, there has been no modeling of where the herbicides will end up in the watershed, the effect on terrestrial and aquatic flora and fauna, nor the long-term health effects on the workers who will apply the herbicides, the patrons of the parks, and the neighbors of the park. Studies supporting the purported safety of glycophosphate (nominally, the active ingredient in Roundup) have been shown to be fraudulent, and recent studies have demonstrated the toxicity of glycophosphate, e.g., http://www.sciencedirect.com/science/article/pii/S0278691512005637.

It is inevitable that the herbicides will be carried by runoff into local streams and lakes and storm sewers. But the extent of this problem, including the geographic dispersion of the herbicides and the long-term health consequences for local residents, seems to be unknown.

Fire is not the only risk faced by East Bay Hills residents: earthquakes are at least as large a risk, and deliberately applied herbicides could prove to be an even larger long-term health hazard. While there is such a thing as "firefighting" (and measures individual homeowners can do to reduce the risks to their lives and property), there is no such thing as "earthquakefighting." When there is a large earthquake in the Bay Area (an eventual certainty), reduced stability of the hillsides from wide-scale tree removal could prove catastrophic. Moreover, toxic herbicides in local lakes (e.g., Lake Anza, Jewel Lake) and streams (Strawberry, Codornices, ...) that might otherwise serve as a source of potable water after an earthquake would severely compromise the disaster-resilience of our community. Once the herbicide is in the watershed, the genie is out of the bottle: there is no way to remove it.

I spend more than 12 hours per week in East Bay Parks, and occasionally as many as 30 hours in a week. The proposed "mitigation" would make the parks unusable by me, as I would not want to risk direct exposure to the herbicides.

Moreover, I live quite close to Tilden Park, and I am deeply concerned about toxics in runoff water from the park, which could literally "hit me where I live." I have voluntarily assumed the risks of fire and earthquake by living where I do, but I did not and will not voluntarily assume the risk of exposure to large amount of herbicides, and the planned "mitigation" increases the risks I would face during and after an earthquake by reducing hill stability and poisoning emergency water sources. The measures would deprive me of the rightful enjoyment of my own property, put me in physical jeopardy, and reduce the value of my property.

Finally, I note that the EIS does not appear to give adequate weight to the loss of raptor habitat from removing eucalyptus groves. I have personally seen snowy owls nested in eucalypts in Claremont Canyon, and owls and hawks in eucalypts in Tilden Park.

I strongly oppose FEMA funding for the EBH fire mitigation as proposed.

Philip B. Stark
Berkeley, CA

--
Philip B. Stark | Professor and Chair | Department of Statistics | University of California
Berkeley, CA 94720-3860 | 510-394-5077 | statistics.berkeley.edu/~stark

From: Dan Stern
To: EBH-EIS-FEMA-RIX
Subject: Comment on East Bay Hills hazardous fire risk reduction project
Date: Tuesday, May 28, 2013 2:39:31 PM

Dear FEMA,

I am writing to express my opposition to the plan outlined at http://ebheis.cdmims.com/Home.aspx. It appears to be flawed in multiple ways; mainly:
1) There is no adequate plan to replace the downed trees with native vegetation. Instead the trees will be chipped and left, creating a greater fire hazard and the possibility of long-term erosion, which creates additional fire hazards.
2) The plan utilizes pesticides, which are dangerous to all life, including human life.

Certain select parts of Claremont Canyon have been restored to Native California habitat through the intensive use of manual labor. I recommend this practice rather than the methods the plan proposes.

Also, people built houses in a forest because they like being near a forest. It defeats the purpose of having a home there if the forest will be torn down.

Sincerely,
Daniel Stern

--
Dan Stern Data Systems
Databases For Good Causes
1904 Franklin St. Suite 903
Oakland, CA 94612
510-835-7842
www.dansternsystems.com
dan@dansternsystems.com

From: Stern, Lise S.
To: EBH-EIS-FEMA-RIX
Subject: Public Comment re: FEMA tree cutting/Berkeley/Oakland
Date: Friday, May 17, 2013 1:00:56 PM

To Whom It May Concern:

I am writing as a public citizen of the East Bay that I am strongly opposed to the clear cutting of thousands of trees in the Berkeley and Oakland Hills, including Stawberry and Clarmont Canyons; as well as the use of pesticides to control the spread of non-native plants. These canyons provide much needed green space for the urban areas around them and are much loved by the community. They are no more a fire hazard than all of the rest of our beloved park land. Given the trend towards climate change we should be planting more trees, not cutting thousands down. And we do not need to add to the environmental toxins already surrounding us with thousands of gallons of herbicide (Round up). This is a public health risk.

I oppose this project in the strongest terms. Do not do this.

Lise Stern, MFT
Mental Health Clinician
Solano County Mental Health

Home) 1502 Laurel Avenue
Richmond, CA 94805

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From: Keefe Stevernu
To: EBH-EIS-FEMA-RIX
Subject: Whom it may concern
Date: Monday, June 17, 2013 10:31:51 PM

Your plan to deforest the parks of the east bay, may create more of an fire hazard than it aims to prevent. Cutting down thousands of trees to be left as dry mulch, sounds to me like a plan to litter forests with kindling. Furthermore, if this plan had consistent fire management in mind, it would replant the tree's that were are set to be cut down with native tree's, as a dry grass plain is more prone to being lit on fire than a cooler wet forest. Additionally, the negative effects of widespread herbicide on the animal population use could be irreversible. The sparser forest left after the cutting would be less resistant to the wind and breezes would could potential spread wild fires. I hope that your department makes great revisions in this plan before it is carried out. A astounding amount of Berkeley residents are disheartened by the proposed plan. These residents have a tendency to carry out extensive fights in order to preserve the integrity of the local environment. they are notorious for having legal battle with the city in order to prevent single trees from being cut down in their neighborhoods. It would very unwise to upset these residents with a poorly orchestrated mass cutting.

Thank you for your time,

Keefe Stevernu

From: Arthur Stopes III
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: Hazardous Fire Risk Reduction Projects, East Bay Hills.
Date: Sunday, June 16, 2013 7:06:48 PM

To: Federal Emergency Management Agency (FEMA), Region IX.

From: Arthur Stopes, III.; Berkeley, California state. (Not “CA”).

Re: Hazardous Fire Risk Reduction Projects, East Bay Hills.

June 16, 2013.

I wish to bring to your corporate attention, the following:
The FEMA Draft Environmental Impact Statement (EIS) for the University of California at Berkeley (UCB),
the City of Oakland, and the East Bay Regional Park District (EBRPD) vegetation management projects in
the East Bay hills is unacceptable, because:

1. The EIS does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments
will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set
that was used to construct the EIS. This flame length is worse than what could be expected with the trees
that exist currently. I/we ask that you retract the EIS and rework it to develop a proposal that addresses the
problem.

2. The EIS does not adequately address the effects of these projects on Greenhouse Gas emissions and the
ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but
also fails to adequately consider the loss of ongoing carbon sequestration that will result from these
projects. I/we ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas
implications of cutting down 100,000 tall trees.

3. The EIS, as currently written, does not adequately address the cost or the risks associated with the
herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the
implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom,
thistle, and poison oak that will emerge as a result of the loss of shade canopy.

4. The EIS does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less
costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS
fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather
than simply dismissing them without any serious analysis.

5. The EIS does not adequately analyze the effects on air quality resulting from the proposed plan. I/we ask
that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air
quality.

6. The EIS relies on a fire model that is fundamentally flawed in that it compares the risk of the current
environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless
comparison, as the EIS does not specify any means by which the project proponents will maintain the
environment in this condition. Because of this, shortly after the projects are completed the fire danger will
begin to increase. I/we ask that you retract the EIS and rework it to include a fire model that analyses the
expected end result vegetation rather than an essentially irrelevant state.

7. Finally, your agency's proposed deforestation plan fails to consider the restitution of any redwoods.
I note that, in your list of "Acronyms and Abbreviations", both "RDWD redwood forest" and "SESE *Sequoia*
sempervirens (coast redwood)" are listed, but neither of those appear in the text. Is that an oversight?

Thank you for your due attention.

Arthur Stopes, III.

California Native Plant Society
East Bay Chapter P O Box 5597, Elmwood Station, Berkeley, CA 94705

June 17, 2013

Federal Emergency Management Agency
Department of Homeland Security
500 C Street, SW
Washington, DC 20472

RECEIVED
JUN 17 2013
BY:

Subject: Draft HFRR EIS for the East Bay Hills, California

Dear Sir/Madam:

The California Native Plant Society's East Bay Chapter appreciates the opportunity to comment on the 2013 Hazardous Fire Risk Reduction Environmental Impact Statement for the East Bay Hills of California.

The California Native Plant Society is a statewide non-profit organization that works to protect California's native plant heritage and preserve it for future generations. The Society's mission is to increase the understanding and appreciation of California's native plants and to preserve them in their natural habitat. We promote native plant appreciation, research, education, and conservation through our 5 statewide programs and 33 regional chapters in California. The East Bay Chapter (EBCNPS) covers Alameda and Contra Costa Counties and represents some 1100 members.

EBCNPS has been involved with protecting and conserving native plant resources in the East Bay Hills for some 47 years. Our members have worked in these parks and preserves in partnership with EBRPD and other entities over many decades. Our insights and suggestions are derived from first hand experience.

This comment letter was coordinated by the Conservation Committee of EBCNPS, with substantial contributions from our plant scientists on the Rare Plant, Vegetation, and Significant and Unusual Plants Committees. Additionally, included in this letter are comments written by chapter members who are local experts with special knowledge of two of the regional preserves where fuels management work will occur.

These East Bay Hills are rich with native vegetation and rare and unusual plants that often are found nowhere else in the two- county East Bay area. The East Bay Hills are home to a large number of endangered, threatened, and locally rare plants, which could be affected by fuels management projects. EBCNPS wants to ensure that the EIS will address potential impacts to these plants, as well as to other more common, yet habitat rich vegetation types. Appendix A provides a list of CEQA protected A-ranked plants, or plants that are locally rare, including federally listed and state listed plants.

We understand FEMA's overarching charge in funding projects covered in the DEIS for the East Bay Hills and the Richmond shoreline is to steward the public monies wisely by

funding work that will be effective in substantially reducing fire hazard, while protecting to the greatest extent possible the natural resources and native habitat values of these important wildlands.

FEMA has accepted the strategy of U.C. Berkeley and the City of Oakland to remove whole populations of exotic trees and exotic shrubs and other invasive exotic weeds in the native shrublands, while encouraging native plant communities to expand. Why then, does this FEMA document allow the East Bay Regional Park District to potentially perform actions that will have significant, irreversible and adverse impacts to native habitats? These actions include radical thinning and clearing of extensive native brushlands, scrublands, and riparian associations, while merely thinning, not removing the highest fire hazard vegetation of all: the exotic acacia, pine and eucalyptus plantations?

A key important element of the FEMA funding criteria is 'avoidance of impacts'. Yet the Park District, which has a mission of protecting and enhancing native habitat values, is the main entity in designing projects with serious impacts that will degrade native habitat values by replacing viable stands of native vegetation with exotic annual grassland, known for drying out the top layer of soil, and extending the fire season with dried out flashy surface fuel that can act like a fuse to ignite other areas. Is this model of vegetation management really going to produce a less hazardous condition in the East Bay Hills? Will this approach break up stands of more fire-resistant, and firebrand-absorbing plant communities, and replace them with hugely expanded acreages of more flammable exotic weed monocultures? We certainly support efforts to remove broom and other weeds from brush and scrublands. Does FEMA support the conversion of the biologically diverse and richer native brush and scrublands to weedy exotic annual grasslands with little native habitat value? Does FEMA support radical 'thinning' of shrub lands and converting 50-70% of the biomass to weedy annual grassland as a good management strategy? Would FEMA, in some cases where shrubland reduction is unavoidable, favor reducing the amount of dead plant material by hand trimming, and allowing the native scrub to regrow, in a younger and more lush iteration of that plant association (as noted in DEIS, appendix M, page 13).

The FEMA grants require monitoring and weed maintenance for years to come. Yet the FEMA grants do not supply funding for any of the follow up weed abatement. The East Bay Regional Park District, City of Oakland, and UC Berkeley have great trouble keeping up with acres of weedy species now in their stewardship purview. There just isn't money available for comprehensive management of weedy invasives. This is demonstrated by the many acres of weedy 'fuels managed' areas, including fire roads. What mechanism is being instituted by FEMA in this DEIS to guarantee a commitment of money and personnel for management of greatly increased acreages of newly created annual weedy grassland?

Native perennial grasslands are altogether more fire resistant than exotic annual grasslands, as the hardy native bunch grasses are deep rooted and hold moisture in their above ground parts much longer than their weedy annual counterparts. Can FEMA in this

DEIS require that funds be made available long term, for conversion of native shrublands into native perennial grasslands, where conversion to 'grassland' is deemed absolutely necessary? Alternatively, where such a strategy is not considered feasible for brush, scrub, and riparian associations, could FEMA in this DEIS, require hand thinning, removal of invasive exotics, and removal of all nearby high fire hazard exotic tree populations, as a more effective long term strategy?

This DEIS consistently lacks adequate vegetation naming, surveying and mapping, related to the proposed and connected project areas. Why was the current Manual of California Vegetation, Second Edition, not used in classifying the vegetation communities accurately? This is an important oversight that renders much of the document out of date and with questionable accuracy, regarding vegetation communities that will be negatively impacted by proposed fuels management work. The M.O.U. that established this requirement is appended to these comments.

In our EBCNPS letter prepared in response to the NOP for this DEIS on October 1, 2010 (Appendix B), we submitted a listing of Significant and Unusual Plants that we asked adequate field surveys for, and mapping of these resources be prepared as part of the resource assessment for this DEIS. Unusual and Significant Plants are those species that in the local biotic and geographic region of this Project Limits clearly meet defined standards for local rarity. These species should be considered in this DEIS; the concerned Project Applicants are required by California environmental regulation to consider these resources; projects potentially funded by FEMA should comply with local environmental regulations. Further justification for FEMA to consider both Federally and State Listed plants and plant communities together comes from the Memorandum of Understanding For Cooperative Vegetation Habitat Mapping and Classification which was signed in 2000 (Appendix C) by multiple agencies responsible for resource oversight in California, including both USFWS and CDFW.

Why has this document not included adequate survey and mapping data, assessments of potential impacts, and mitigations for these impacts? Please find appended, an updated listing of concerned species (Appendix A), as well as our original EBCNPS NOP response letter mentioned above.

General Comments:

Throughout the document and maps botanical nomenclature and taxonomy are out of date. This DEIS was released in 2013. The primary reference manual of the California Flora is *The Jepson Manual: Vascular Plants of California, Second Edition* published in January 2012. Therefore the DEIS should follow the accepted names used in California in the preparation of this document. Updated names should be used in the Final EIS. Will improper botanical names be revised before the final document?

Although mitigation measures are included for *Phytophthora cinnamomi* there are no mitigation measures for *Phytophthora ramorum* (Sudden Oak Death). Sudden Oak Death is known to occur in the East Bay hills and its spread should not be amplified through this

project's activities. Mitigation measures for addressing this serious threat to the integrity of our oak woodlands should include: surveys for the pathogen in project action areas, how trees with Sudden Oak Death infections are treated during risk reduction activities, and how tools are cleaned after Sudden Oak Death infected trees are cut.

New locations of individuals or small populations of pallid manzanita are most likely to occur deep in the understory of Eucalyptus or Pine stands where they are in shaded habitat. Because of their location in these understories, tree removal may result in sun shock, which may kill these understory occupants by a rapid increase in sun exposure and reduction in soil moisture. Trees in occupied pallid manzanita habitat should be removed at the appropriate time to reduce potential sun shock to these plants. Project actions should include the removal of the majority of the non-native and non-indigenous trees in the fall. The timing of the tree removal in late fall will allow existing pallid manzanitas to adjust to the increased exposure to light and heat during cooler seasonal temperatures before the following spring and summer.

CDFG protocols state: "A discussion of threats, including those from invasive species, to the plants and natural communities" must be included as part of the assessment of potential impacts in a project environmental document. This DEIS does not include a discussion of threats particular weed species may pose to existing populations of rare plants species and/or sensitive natural communities within project action areas. Without detailed information about the types of invasive weeds and the chemicals that may be used to treat them, an evaluation of real threats to rare plants and/or sensitive natural communities from weed species or herbicide application cannot be made. This document should include a detailed discussion of what weed/invasive species are of concern on site and what measures will be taken to protect rare plants and/or sensitive natural communities before, during, and after project related activities.

Specific Comments (Wording from dEIS document in *italics*):

<u>Use of MCV2</u>

Section 4.2.2.1.3 *Vegetation Mapping Classification Mapping was conducted in general accordance with the California Native Plant Society (CNPS)' A Manual of California Vegetation (Sawyer et al. 2008).*

Comments:

- The document says that MCV2 (referenced as Sawyer et al. 2008) was used to type the vegetation but the figures do not present MCV2 types. Why not?
- Utilizing the CNPS method, how many relevé or rapid assessment plots were used to characterize and classify the vegetation types within the project area? Can these data forms be appended to this document?

- We assume the CNPS/CDFG vegetation mapping/sampling methods (2011[1]) were used in order to type the vegetation based on MCV2. If so, how many relevé or rapid assessment plots were used to characterize and classify the vegetation types within the project area?
- Were the 'existing vegetation data' referenced on page 4.2-4 (including EBRPD EIR data [EBRPD 2010] and potentially FEMA 2006a, FEMA 2006b, and EBRPD 2006) collected to MCV2 vegetation types? If not, then the data needs to be cross-walked to MCV2 in order properly assess impacts to sensitive natural community types.
- Results presenting MCV2 types should be presented in a recirculated DEIS so the significance of any impacts to sensitive natural communities due to project activities can be evaluated and commented on by the public. This data should either (1) be presented as an appendix to the DEIS and provided with a cross-walk between the broader community types presented in the figures and each MCV2 type or (2) the vegetation community descriptions should be written as MCV2 types, at least to the Alliance level.

Sections Dealing With Sensitive Natural Communities

Section 4.2.3.1.1 Pages 4.2-25 and 4.2-26. *Database searches were conducted using the boundaries defined by the following USGS 7.5-minute quadrangles that overlap the proposed and connected project areas, hereafter known as "project quadrangles": San Quentin, Richmond, Oakland West, Oakland East, Briones Valley, Las Trampas Ridge, San Leandro, and Hayward,*
Page 4.2-5 *Table 4.2-2 lists the CDFW status of five locally distinct vegetation communities and their potential to occur in the proposed and connected project areas based on the California Natural Diversity Database (CNDDB 2012) and field surveys. Northern maritime chaparral is the only locally distinct vegetation community present in the project areas.*

Comments:

- According to CDFW guidelines (2009)[2], the database search for special-status plants and natural communities should include the quadrangles that the project is located on plus the adjacent quadrangles. This search would result in adding Coastal Brackish Marsh for consideration of the potential to occur in the proposed and connected project areas. This should be added to a recirculated DEIS.
- Sensitive natural communities are notoriously underreported. In addition, the data in CNDDB is only for Holland vegetation types; data for vegetation stands typed with MCV2 has not been entered into the system yet (the only MCV2 types that

[1] California Native Plant Society/Department of Fish and Game. 2011. Protocol for Combined Vegetation Rapid Assessment and Relevé Sampling Field Form. May 2011. http://www.cnps.org/cnps/vegetation/pdf/protocol-combined.pdf [Accessed June 13, 2013]
[2] Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. November 2009. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline=1 [Accessed June 13, 2013]

have been entered into CNDDB are those mapped under VegCAMP [approximately 1/3 of the State of California, but not yet including the San Francisco Bay Area] [Diana Hickson, CDFW, pers. comm. with East Bay CNPS 2013]). Consequently, some sensitive natural communities are much more prevalent in the proposed and connected project areas than is reflected in this document.

- The DEIS does not attempt to translate between the Holland types that were queried and MCV2 types which is the current standard. This results in some confusion of naming standards. For instance, Northern Maritime Chaparral is an outdated reference to what is Brittle leaf-Wooly leaf manazanita chaparral within the proposed and connected project areas; this alliance is more equivalent to Central Maritime Chaparral.
- Another reason for presenting the MCV2 types is that the list of mapped vegetation alliances should be checked against the most recent CDFW *List of Vegetation Alliances and Associations* (2013[3]) to determine if any of the types are considered sensitive natural communities (i.e., sensitive or special-status natural communities are vegetation types that have been identified on the most recent CDFW *List of Vegetation Alliances and Associations* as being critically imperiled [state ranking of S1], imperiled [S2], or vulnerable [S3]).

Page 4.2-6, Table 4.2-2 *Northern maritime chaparral: Present. There are two CNDDB occurrences present in the proposed and connected project areas at Sobrante Ridge and Huckleberry Botanic Regional Preserves.*
Section 3.4.2.3.1 *Sobrante Ridge Regional Preserve. Sobrante Ridge Regional Preserve contains proposed project area SO001, a 4.1-acre area on the western edge of the preserve, opposite the eastern end of Rain Cloud Drive. The dominant type of vegetation is oak-bay woodland. EBRPD would convert 0.56 acres of northern maritime chaparral to successional grassland to enhance growing conditions for pallid Manzanita, a federally designated threatened species (see Section 4.2.3). The oak-bay woodland would be preserved.*

Comments:

- Maritime chaparral is a particularly important community type as it is considered to be among the rarest of the remnant plant communities found in the East Bay hills (Dr. Keeler-Wolf, co-author of MCV2 and Senior Vegetation Ecologist with VegCAMP in the Biogeographic Data Branch of CDFW, pers. comm. with EBCNPS 2013; also see Vasey et al. 2012[4]). It is not only present at Sobrante Ridge and Huckleberry Botanic Regional Preserves but also in other areas within or adjacent to the proposed and connected project areas including within

[3] CDFW 2013. Natural Communities --Background Information. California Department of Fish and Game, Sacramento, California. http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp [Accessed June 13, 2013]
[4] Vasey, M.C., M.E. Loik, and V.T. Parker. 2012. Influence of summer marine fog and low cloud stratus on water relations of evergreen woody shrubs (Arctostaphylos: Ericaceae) in the chaparral of central California. Oecologia. October 2012. Volume 170, Issue 2, pp 325-337.

Knowland Park, near Canyon, near Briones Reservoir, Leona Heights (west, southwest, and south of Merritt College), and in the hills surrounding Upper San Leandro Reservoir (location data provided by Dr. Keeler-Wolf, CDFW, pers. comm. with EBCNPS 2013).

- There is a regulatory model for how to address potential impacts to rare maritime chaparral found within the California Coastal Commission (CCC):

  The CCC requires protection of maritime chaparral as an Environmentally Sensitive Habitat Area (ESHA) under Section 30240 of the Coastal Act. An ESHA is described as "Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." Protection of ESHAs is achieved by avoidance of impact: forbidding any development, including roads and structures, within the ESHA and within a buffer zone of 50-100 feet from any development (John Dixon, California Coastal Commission, pers.comm. with EBCNPS 2013). Depending upon individual circumstances, the CCC may also calculate any previous loss of chaparral habitat at a project site due to roads or other development and can require that these areas be counted in the total impacts. It can also require restoration where appropriate because of previous "taking". Staff biologists undertake extensive reviews of every development proposal, and decisions whether and what to permit are based on a firm understanding of the ecology of the ESHA.
- The statement in Section 3.4.2.3.1 that "EBRPD would convert 0.56 acres of northern maritime chaparral to successional grassland to enhance growing conditions for pallid Manzanita…" is nonsensical. Pallid Manzanita is a maritime chaparral species, not a grassland species. Converting maritime chaparral acreage to grassland will harm growing conditions for pallid Manzanita rather than "enhance" them. EBCNPS recommends avoiding impacts to maritime chaparral in order to preserve this rare and protected plant and habitat.

  The proposed fuels treatment of shrublands and scrublands (removal of 50-70% shrub cover or the conversion of shrublands to annual grasslands[5]) must be avoided in any sensitive natural community, including within maritime chaparral.

Page 4.2-6, Table 4.2-2 *Valley Needlegrass Grassland: No potential. The community is not present in the proposed and connected project areas. There were no observations of the community during field surveys, and there are no CNDDB occurrences in the proposed and connected project areas.*
Page 4.2-5 *Small patches of two other sensitive vegetation communities, serpentine bunchgrass and coastal terrace prairie, also occur as described below.*
Page 4.2-18 and 19 *In the Miller/Knox Regional Shoreline area, native grasses in coastal prairie patches include seashore bentgrass* (Agrostis pallens) *junegrass* (Koeleria

[5] Biological Opinion for the Proposed Federal Emergency Management Agency (FEMA) Hazardous Fire Risk Reduction Project in the East Bay Hills of Alameda and Contra Costa Counties, California (HMGP 1731-16-34, PDM-PJ-09-CA-2005-003, PDM-PJ-09-CA-2005-11, and PDM-PJ-09-CA-2006-004). May 10, 2013. p 16.

macrantha), *and red fescue* (Festuca rubra). *These areas of coastal prairie we not mapped because the patch sizes were much smaller than the minimum mapping area identified in the methods of this project.*

Page 4.2-21 *Scattered native grasses, including purple needlegrass, blue wild rye, and creeping wild rye (Leymus triticoides), occur sparingly in this community in the proposed and connected project areas.*

Comments:

- Areas of Purple Needlegrass (*Stipa pulchra*, formerly *Nassella pulchra*) Grassland, Valley Needlegrass Grassland, and Creeping Wildrye (*Elymus triticoides*, formerly *Leymus triticoides*), all considered sensitive natural communities, are present within the project area. Stating that these grasses occur sparingly is not enough information to indicate the cover values of these species within affected grasslands. Cover values determine if these patches qualify as distinct communities based on the membership rules for the subject community. Depending on the type, cover values can be as low as 20% for Purple Needlegrass Grassland. If the minimum mapping unit was 200 square feet (as described on page 4.2-4), there would certainly be some areas qualifying as these grassland types. Why were these areas not evaluated based on cover values, mapped, and included for impact analysis with this document? They should be included. In addition, numerous stands of purple needlegrass and creeping wildrye have been documented in other areas within or adjacent to the proposed and connected project areas including in the hills between Canyon and the southern edge of Upper San Leandro Reservoir (location data provided by Dr. Keeler-Wolf, CDFW, pers. comm. with EBCNPS 2013). These sensitive natural communities should be mapped and included for impact analyses.
- Coastal terrace prairie is not only present at Miller/Knox Regional Shoreline, but also in other areas within or adjacent to the proposed and connected project areas including Point Molate and Point Richmond. This sensitive natural community should be mapped and included for impact analyses.
- Other sensitive natural communities which exist in the proposed and connected project areas include Bay Woodland (which should be separated from Live Oak Woodland, particularly within the drainages) and Redwood forests. Need to ensure impacts to all potential sensitive natural communities are avoided.

4.2.3.1 *Methodology for Evaluating the Presence of Sensitive Biological Resources The evaluation of the sensitive biological resources in the proposed and connected project areas consisted of database searches, a literature review, and field surveys of vegetation communities.*

Comment:

This section does not include and evaluation of locally rare plant species. CEQA requires that impacts to "resources that are rare or unique to that region" be evaluated [CEQA Guidelines 15125(c)]. This includes botanical resources that

are, but not limited to, peripheral populations and disjunct subpopulations. These are informal terms that refer to those species that might be declining or be in need of concentrated conservation actions to prevent decline, but have no legal protection of their own. Also, CEQA Guidelines Section 15380 states "a species not included in any listing...shall nevertheless be considered to be rare or Endangered if the species is likely to become Endangered within the foreseeable future throughout all or a significant portion of its range and may be considered Threatened as that term is used in the Endangered Species Act." Locally rare species tracked by the East Bay Chapter of CNPS meet these criteria (Lake 2010[6]). Their status is based on their rarity and endangerment throughout all or portions of their range. Since the concerned Project Applicants are required by California environmental regulation to consider these resources; projects potentially funded by FEMA should comply with local environmental regulations.

Table 4.2-3

Comment:
The following comments address the inadequacy of determinations for potentially occurring rare plant species within the project areas.

- Choris' popcorn-flower (*Plagiobothrys chorisianus* var. *chorisianus*) = This species was determined as having no potential to occur within project areas. Based on specimen information included in the California Consortium of Herbaria[7] there are known records of this species from "Strawberry Canyon, Berkeley Hills" and Oakland". The potential to occur should be changed from "No Potential" to "Low Potential".
- Coastal triquetrella (*Triquetrella californica*) = based on information from our Rare Plant Committee Chairman This species' potential to occur should be changed from "No Potential" to "Moderate Potential". This is an often overlooked species that has been observed in new locations throughout the Bay Area in habitat resembling "successional grasslands" as described in this document. With little to know moss inventorying taking place in the East Bay it cannot be ruled out as not occurring within the project areas as there are historic records from Mount Diablo and new records from San Bruno Mountain (pers. comm. Bartosh 2013). Because there is abundant suitable habitat between these two localities this species should be considered as having a potential to occur within the project areas.
- Coast Iris (*Iris longipetala*) = This species was not addressed in the table. It should be treated as having a "Moderate Potential" to occur within the project areas based on herbaria records from the "top of the North Berkeley Hills" and "Point Isabel" (CCH 2013)

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[6] Lake, Dianne. 2010. *Rare, Unusual and Significant Plants of Alameda and Contra Costa Counties*. East Bay Chapter of the Caliornia Native Plant Society.

[7] Data provided by the participants of the Consortium of California Herbaria (CCH) (ucjeps.berkeley.edu/consortium/).

- Fragrant fritillary (*Fritillaria liliacea*) = The location Miller Knox should be added to the areas where this species has the potential to occur based on a collection from "Point Richmond" (CCH).
- Kellogg's horkelia (*Horkelia cuneata* var. *sericea*) = Herbaria records do exist for this species from the "Oakland" area (CCH 2013) and suitable habitat is present within the project areas, there for the potential for occurrence of this species should be changed from "No potential" to "Low Potential".
- Mount Diablo cottonweed (*Micropus amphibolus*) = This species is not addressed in the table though it should be based on numerous records appearing in the Consortium of California Herbaria from localities such as "Old Tunnel Road", "Strawberry Canyon", "North Berkeley Hills", and "Wildcat Canyon". This species should be treated as having a "High Potential" to occur within the project areas.
- Oakland Star-tulip (*Calochortus umbellatus*) = This species is not addressed in the table though it should be based on numerous records appearing in the Consortium of California Herbaria from localities such as "Grizzly Peak", "above Mills College", "East Oakland Hills", "Strawberry Canyon", "Wildcat Canyon", and near "Lake Temescal". This species should be treated as having a "High Potential" to occur within the project areas.
- Bristly leptosiphon (*Leptosiphon acicularis*) = This species was not addressed in the table. It should be treated as having a "Moderate Potential" to occur within the project areas based recent CNDDB records from the Oakland Hills and the fact that this species is often overlooked and underreported (pers. comm. Bartosh 2013).
- San Francisco Bay sunflower (*Chorizanthe cuspidata* var. *cuspidata*) = The infraspecific name for this taxon is misspelled in the table.
- Pallid manzanita (*Arctostaphylos pallida*) = It should be noted that this species can also occur as isolated individuals or small groups in the understory of Eucalyptus forest in the East Bay Hill as this species has been observed in low numbers within this habitat type in Redwood Regional Park. Rare plant surveys should focus on identifying and locating these individuals or small populations within this habitat type (pers. comm. Bartosh 2013).

5.1.6.3.2 Proposed and Connected Actions

<u>*Impacts during Implementation*</u>
This subsection states that special-status plant species "*could be directly impacted if they are present in treatment, staging, or access areas during implementation. Plants could be damaged or killed by workers or heavy machinery or indirectly impacted from loss of suitable habitat conditions.*"

Comment:

The purpose of an Environmental Impact Statement is to evaluate impacts on the environment, in this case special-status species, from a proposed action. Since

there have be no protocol-level rare plant surveys conducted in proposed action areas to date, the actual presence and distribution of special-status plant species and the affects of proposed project actions were not evaluated in this document. Without abundance and distribution information the potential significance of impacts to special-status plant species is inadequately evaluated in this document. Real impacts to rare plant species should be evaluated herein which can only take place after protocol-level rare plant surveys have been conducted, level of impacts based on proposed actions are evaluated, and this DEIS is recirculated with that information.

Impacts from Habitat Loss or Alteration

Temporary loss or alteration of habitat could result in impacts on special-status plants due to erosion or changes in soils from the placement of eucalyptus wood chips. During implementation of the proposed and connected actions, the best management practices described in Section 5.1.3.3.1 would be implemented to avoid potential impacts from soil erosion. In addition, MMPs would be implemented to restore and enhance native habitats in the long-term. An analysis of the potential for toxicity from eucalyptus wood chips indicates that short-term and localized effects on soil microbes, soil invertebrates, and terrestrial plant seedlings may result from exposure to fresh eucalyptus and possibly pine wood chips (see Appendix L).

Comment:

This evaluation and conclusive assumption that the effects of Eucalyptus and Pine wood chips are negligible on special-status plant species and their habitat is negligible is inadequate. This is based on a study produced out of Florida and assumes that allelopathic effects from Eucalyptus and Pine species last only three months. There is no data presented in this document, including Appendix L, on what species of Eucalyptus or Pine were studied. Are these the same species we have in California? This section also does not evaluate the potential affects of wood chip spreading to special-status plant species with differing life forms such as geophytes (bulbs), annuals, herbaceous perennials, and shrubs. Wood chips affect bulbs and herbaceous species in different ways that woody shrubs. An evaluation and action of how wood chip application is executed within occupied rare plant habitat based on life form should be included in this document.

Impacts From Herbicide Application

The application of herbicides could result in impacts on special-status plants if there is direct contact with chemicals that cause toxicity. Herbicide application is unlikely to affect pallid manzanita or Presidio clarkia because these species are not known to be present in the treatment areas proposed for herbicide application. However, if pallid manzanita, Presidio clarkia, or other special-status plants are present, they could be affected. Mitigation measures described in Section 5.1.6.3.3 would be taken to protect any special-status plants that could be present unexpectedly in or near the treatment areas.

Comment:

This mitigation measure as well as mitigation measure 5.1.6.3.3 are inadequate as it they do not address or mitigate herbicide application near occupied habitat for special-status plant species other than Presido Clarkia and Pallid Manzanita. This mitigation measure should address the timing and type of herbicide used based on the type of habitat and life form (annual, perennial, or shrub) of the subject rare plant.

5.1.6.3.3 Mitigation Measures

Protocol Surveys (BR-8)

As described in Section 5.1.6.2.3, a biological monitor would be made available to be on site and/or on call during implementation activities to avoid or reduce potential impacts on special status species under the proposed and connected actions such that impacts would not be significant. In addition, the following measure specific to special-status plants would be implemented:

> *Pre-implementation surveys would be conducted to determine the presence of special-status plants within the project areas where vegetation management activities would be conducted. Botanists would conduct a botanical survey for the listed species during the blooming period for each species before vegetation management activities start. All special-status plants would be clearly flagged with high visibility flagging and avoided.*

Comment:

Conducting surveys to locate special-status plant species after the release of this DEIS does not provide full disclosure of all rare plant species present within the project areas and allow for a full analysis of the significance of impacts resulting from this project. This mitigation measure is inappropriate to determine the significance of impacts to existing special-status plant populations or those yet unknown because of the lack of an evaluation of direct, indirect, and cumulative impacts to specific plant taxa throughout their overall range and within the region. This is also deferred mitigation. California Department of Fish and Game (CDFG) rare plant survey protocols[8] "meet California Environmental Quality Act (CEQA) requirements for adequate disclosure of potential impacts". These protocols indicate that Botanical Survey Reports should include the following to assess potential impacts:

- A discussion of the significance of special status plant populations in the project area considering nearby populations and total species distribution;
- A discussion of the significance of special status natural communities in the project area considering nearby occurrences and natural community distribution;
- A discussion of direct, indirect, and cumulative impacts to the plants and natural communities;

[8] Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. November 2009. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline=1

- A discussion of threats, including those from invasive species, to the plants and natural communities;

  While details of this information is provided for Pallid manzanita and Presidio clarkia, no information of this nature (bulleted items) is provided for any of the other rare plant species known to occur within or adjacent to project action areas. Rare plant surveys should be conducted and their results included in a recirculated DEIS so the significance of any impacts to rare plants due to project activities can be evaluated and commented on by the public.

Specific Comments Regarding EBRPD Sobrante Ridge Treatment from EBCNPS member Gudrun Kleist

I live within easy walking distance of Sobrante Ridge and have been hiking there daily since March 1987. While there are plenty of non-natives such as annual grasses, yellow star thistle, poison hemlock and others, there are essentially no non-native trees nor shrubs (including broom) growing on Sobrante Ridge (yet).

It appears from reading 81420-2010-F-0849-3 that the park service intends to convert the oak/bay forest at the West side to oak woodland and "California" annual grasslands, which are essentially non-native weed farms. There is no detailed close-up map of the exact area, so it is difficult to determine just where this work is to be done.

I find the section on the Alameda manzanita (*Arctostaphylos pallida*) particularly troubling, especially the removal of Madrone (*Arbutus menziesii*) and the other Manzanitas growing in the area. There are only a handful of Madrones growing in a very small area, one of them a majestic old tree. To cut down a mature hundred(s) year old native tree to "save" a couple of Manzanitas is absurd. The different Manzanitas and the Madrones bloom in succession over many months starting in December through April providing food for the native hummingbirds and bumblebees. The berries from all are consumed by birds and small mammals. (Rodents are an important food source for the Alameda whip snake). While I agree that the California Bay trees (*Umbellularia californica*) should be removed, decimating or damaging a sensitive vegetation community while considering the preservation of only one species in it is counterproductive. The same is true for only taking the Alameda whip snake and red-legged frog into consideration instead of all of the native fauna that are interrelated.

Ironically, one of the major reasons for the decline of A. pallida is **fire suppression**. *A. pallida* seeds need fire to germinate. The occasional fire in a Northern Maritime Chaparral also keeps undesirable (native) plants such as *Umbellularia californica* at bay (pun intended).

On Sobrante Ridge, many years of herbicide spraying and running large herds of goats unsupervised by a plant knowledgeable person to control the "California" annual

grasslands have resulted in a decline of the few native species and an invasion of even bigger weeds. Oaks have been gouged and their trunks buried in dirt by bulldozers "clearing" the fire roads. The chips of cut and pruned trees are blown into the woods, covering the understory and piling up against tree trunks.

All this leaves me with wondering how well the extremely valuable and rare park resources will be managed in regards to native flora and fauna.

-Gudrun Kleist

Specific Comments from EBCNPS Restoration Committee Chair, Janet Gawthrop Regarding EBRPD Huckleberry RP and Sibley RP Treatment

Unlike much other public land in the East Bay Regional Park District (EBRP), both Huckleberry and Sibley are regional preserves, not just parks. Both received the preserve designation because of their unusual natural resources, botanical as to Huckleberry, and mostly geological, with some botanical in Sibley.

Huckleberry and Sibley preserves share a boundary, as well as much indigenous flora. Much of this flora is unusual in the East Bay, not just pallid manzanita. Western leatherwood occurs in many locations in Huckleberry, but the US Fish & Wildlife Service (USFWS) discusses preservation measures for western leatherwood only in Redwood Regional Park. Along with this oversight, both the FEMA EIS and USFWS Biological Opinion omit all reference of the many rare taxa, including the population of locally rare shrub (Vaccinium ovatum) for which Huckleberry Botanic Preserve was named. While EBRP's goal of removing invasive plants is laudable, the district would only detract from its stated goal of fire prevention by disturbing the native plant communities that have been growing there.

FEMA should not grant funding to remove or thin "shrubland" vegetation in either of these preserves until EBRP conducts biological surveys of the preserves, using current protocols in the Manual of California Vegetation, 2nd edition (MCV2). "Shrubland", without more, does not designate a fire risk or a plant community. The FEMA EIS presents inadequate description of the preserves' flora to allow any contractor bidding on the work to save the flora that originally inspired creation of Huckleberry Botanic Preserve.

Both Huckleberry and Sibley preserves now have healthy stands of rare maritime chaparral, in which federally listed pallid manzanita grows. Disturbance and thinning of maritime chaparral communities will almost certainly open the way for invasive plants to establish themselves where the present, native vegetation now largely excludes them. Rather than "shrubland islands" or thinning, eradication of the Eucalyptus globulus grove next to the parking lot, with hand felling of individual Monterey pines in the preserve, will eliminate what little fire risk now exists in Huckleberry Botanic Preserve.

The maps and polygons included in the FEMA EIS lack sufficient detail even to distinguish the labyrinthine boundary of Huckleberry with various private property owners uphill of the park. It is possible to see PG&E towers in the EIS aerial photos, but impossible to find the low, yellow lane of dead exotic grasses seen easily at ground level. All the coastal scrub and maritime chaparral plants in surrounding parkland retain their moisture and remain green as ever into the summer. The exotic, annual grassland that grew in after PG&E "tree work" below their tower presents the most flammable vegetation in the area. The chapter's monthly restoration crew at Huckleberry has not found any perennial bunchgrasses in the PG&E clearance area, even though native, perennial bunchgrasses now grow only a few meters away in undisturbed areas.

EBCNPS is concerned that in the vegetation management goals[9] for the Huckleberry RTA's none of them mention the maritime chaparral as a management goal. The maritime chaparral is mentioned to exist there in the description of the RTA, but not as a vegetation management goal. Palid Manzanita is of course a plant worthy of protection, but it is important not to overlook its native habitat (maritime chaparral) when considering how to best preserve the species.

-Janet Gawthrop
Restoration Committee Chair, EBCNPS

EBCNPS appreciates the consideration of these comments and will look forward to following this project in the future. Please do not hesitate to contact us with questions at conservation@ebcnps.org or by phone at (510) 734 0335.

Sincerely,

Jean Robertson
Chair, Conservation Committee
East Bay Chapter,
California Native Plant Society

[9] Biological Opinion for the Proposed Federal Emergency Management Agency (FEMA) Hazardous Fire Risk Reduction Project in the East Bay Hills of Alameda and Contra Costa Counties, California (HMGP 1731-16-34, PDM-PJ-09-CA-2005-003, PDM-PJ-09-CA-2005-11, and PDM-PJ-09-CA-2006-004). May 10, 2013. pp 29-30.

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APPENDIX A: CEQA protected A-Ranked Plants known from the East Bay Hills - 2013

East Bay CNPS Rarity Rank	California Rarity Rank	Scientific Name	Common Name	Habitat
A1x	CEQA	Acmispon denticulatus	meadow trefoil	Riparian, Miscellaneous
A1x	CEQA	Acmispon junceus var. biolettii	rush lotus	Chaparral, Sand, Sandstone
A2	CEQA	Adiantum aleuticum	five-finger fern	Riparian
A1	CEQA	Agoseris apargioides var. apargioides	seaside agoseris	Forest, Grassland (Annual or Perennial), Scrub (Coastal or Interior), Sand, Sandstone
A1	CEQA	Agoseris apargioides var. unknown	seaside agoseris	Miscellaneous
A2	CEQA	Agrostis hallii	Hall's bent grass	Forest, Woodland
A2	CEQA	Allium amplectens	narrow-leaved onion	Open Dry Slope, Serpentine or Serpentine-derived soils, Woodland, Miscellaneous
A1	CEQA	Allium falcifolium	sickle-leaved onion	Rock, Tallus, Scree, Serpentine or Serpentine-derived soils
A2	CEQA	Alnus rubra	red alder	Riparian
A2	CEQA	Amaranthus californicus	Californian amaranth	Miscellaneous Wetlands
A2	CEQA	Amaranthus powellii	Powell's amaranth	Miscellaneous
A1	CEQA	Ammannia coccinea	long-leaved ammannia	Riparian, Miscellaneous Wetlands
*A1x	4.2 S3.2(CEQA) G3	Amsinckia douglasiana	Douglas' fiddleneck	Open Dry Slope, Rock, Tallus, Scree
A2	CEQA	Amsinckia eastwoodiae	Eastwood's fiddleneck	Grassland (Annual or Perennial), Miscellaneous
*A2	1B.2 S2(CEQA) G2?	Amsinckia lunaris	bent-flowered fiddleneck	Grassland (Annual or Perennial), Woodland, Miscellaneous
A2	CEQA	Amsinckia tessellata var. tessellata	desert fiddleneck, devil's lettuce	Grassland (Annual or Perennial), Miscellaneous
A1	CEQA	Anagallis minima	chaffweed	Vernal Pool, Miscellaneous Wetlands
*A2	4.2 S3.2?(CEQA) G5?T3T4	Androsace elongata subsp. acuta	California androsace	Open Dry Slope, Grassland (Annual or Perennial)
A2	CEQA	Anisocarpus madioides	woodland tarweed, woodland madia	Forest, Redwood Forest, Woodland
A1x	CEQA	Anthoxanthum occidentale	California sweet grass, vanilla grass	Forest, Redwood Forest
A2	CEQA	Apocynum cannabinum	dogbane, Indian-hemp	Freshwater Marsh, Riparian
A1x	CEQA	Arctostaphylos crustacea subsp. rosei	Rose's manzanita	Chaparral, Sand, Sandstone
*A1	1B.1 S1(CEQA) G1 CE FT	Arctostaphylos pallida	pallid manzanita	Chaparral, Sand, Sandstone
A2	CEQA	Asarum caudatum	wild-ginger	Forest, Redwood Forest
A1	CEQA	Asclepias cordifolia	purple milkweed	Chaparral, Grassland (Annual or Perennial), Rock, Tallus, Scree, Woodland
A2	CEQA	Asclepias speciosa	showy milkweed, milkweed	Miscellaneous
*A1	1B.2 S2(CEQA) G2T2	Astragalus tener var. tener	alkali milkvetch	Alkali Areas, Grassland (Annual or Perennial), Vernal Pool, Miscellaneous Wetlands

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*A2	1B.2 S2(CEQA) G2	Atriplex joaquinana	San Joaquin spearscale, San Joaquin saltbush	Alkali Areas, Grassland (Annual or Perennial), Miscellaneous Wetlands
A2	CEQA	Atriplex lentiformis	big saltbush	Alkali Areas, Scrub (Coastal or Interior)
*A1	1B.2 S2(CEQA) G3G4T2	Balsamorhiza macrolepis	big-scale balsamroot	Grassland (Annual or Perennial), Serpentine or Serpentine-derived soils
A1	CEQA	Berberis nervosa	Oregon grape	Forest
A2	CEQA	Brodiaea terrestris subsp. terrestris	dwarf brodiaea	Grassland (Annual or Perennial), Woodland, Miscellaneous Wetlands
A1?	CEQA	Calamagrostis koelerioides	tufted pine grass	Open Dry Slope, Grassland (Annual or Perennial), Miscellaneous
A1x	CEQA	Calamagrostis nutkaensis	Pacific reed grass	Coastal Strand, Freshwater Marsh, Forest, Redwood Forest
*A2	4.2 S3.2?(CEQA) G4	Calandrinia breweri	Brewer's calandrinia	Burns, Chaparral, Scrub (Coastal or Interior)
*A2	1B.1 S2(CEQA) G2	California macrophylla	round-leaved filaree	Grassland (Annual or Perennial), Scrub (Coastal or Interior)
*A2	1B.2 S2.1(CEQA) G2	Calochortus pulchellus	Mount Diablo fairy-lantern	Chaparral, Serpentine or Serpentine-derived soils, Woodland
*A2	4.2 S3.2(CEQA) G3	Calochortus umbellatus	Oakland star-tulip	Chaparral, Scrub (Coastal or Interior), Woodland
A1	CEQA	Calycadenia multiglandulosa	sticky calycadenia	Rock, Tallus, Scree, Scrub (Coastal or Interior), Serpentine or Serpentine-derived soils
A2	CEQA	Calystegia malacophylla subsp. pedicellata	woolly morning-glory	Chaparral, Serpentine or Serpentine-derived soils, Scrub (Coastal or Interior)
A2	CEQA	Calystegia sepium subsp. limnophila	hedge bindweed	Miscellaneous Wetlands
A2	CEQA	Camissoniopsis intermedia	small primrose	Burns, Scrub (Coastal or Interior)
A2	CEQA	Camissoniopsis micrantha	small primrose	Coastal Strand, Dry Wash, Sand, Sandstone
A1	CEQA	Carex aquatilis var. dives	Sitka sedge	Miscellaneous Wetlands
A1	CEQA	Carex brevicaulis	short-stemmed sedge	Rock, Tallus, Scree, Sand, Sandstone
A2	CEQA	Carex densa	dense sedge	Miscellaneous, Miscellaneous Wetlands
A1	CEQA	Carex globosa	round-fruited sedge	Miscellaneous
A1x	CEQA	Carex gracilior	slender sedge	Forest, Grassland (Annual or Perennial), Miscellaneous Wetlands, Miscellaneous
A1	CEQA	Carex harfordii	Harford's sedge, Monterey sedge	Miscellaneous Wetlands
A1	CEQA	Carex laeviculmis	smooth-stemmed sedge	Woodland
A1	CEQA	Carex lenticularis var. lipocarpa	few-ribbed sedge	Miscellaneous Wetlands
A1	CEQA	Carex leptopoda	slender-footed sedge, short-scaled sedge	Miscellaneous Wetlands, Miscellaneous
A2	CEQA	Carex multicostata	many-ribbed sedge	Miscellaneous
A2	CEQA	Carex obnupta	slough sedge	Miscellaneous Wetlands
A1	CEQA	Carex pellita	woolly sedge	Miscellaneous Wetlands
A2	CEQA	Carex senta	western rough sedge, rough sedge	Riparian, Miscellaneous Wetlands
A1	CEQA	Carex unilateralis	one-sided sedge	Miscellaneous

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*A1	4.2 S3(CEQA) G4T3T4	Castilleja ambigua subsp. ambigua	Johnny-nip	Coastal Bluff, Grassland (Annual or Perennial)
A2	CEQA	Castilleja applegatei subsp. martinii	wavy-leaved indian paintbrush	Chaparral, Scrub (Coastal or Interior)
A1	CEQA	Castilleja exserta subsp. latifolia	owl's-clover	Coastal Bluff, Sand, Sandstone
A1	CEQA	Castilleja subinclusa subsp. franciscana	Franciscan indian paintbrush	Chaparral, Scrub (Coastal or Interior)
A2	CEQA	Ceanothus thyrsiflorus var. thyrsiflorus	blue blossom, California lilac	Miscellaneous
*A2	1B.2 S2(CEQA) G4T2	Centromadia parryi subsp. congdonii	Congdon's tarplant	Alkali Areas, Grassland (Annual or Perennial), Miscellaneous Wetlands
A1	CEQA	Cheilanthes gracillima	lace fern	Rock, Tallus, Scree
A1	CEQA	Chenopodium rubrum var. unknown	red pigweed, red goosefoot	Alkali Areas
*A2	1B.2 S1.1(CEQA) G2T1 CR FE	Chloropyron molle subsp. molle	soft salty bird's-beak, soft bird's-beak	Brackish Marsh, Salt Marsh
A2	CEQA	Chorizanthe membranacea	pink spineflower	Chaparral, Open Dry Slope, Grassland (Annual or Perennial), Woodland, Miscellaneous
A1	CEQA	Chorizanthe polygonoides var. polygonoides	knotweed spineflower	Gravel, Sand, Sandstone
A2	CEQA	Chrysolepis chrysophylla var. minor	golden chinquapin	Chaparral, Forest, Sand, Sandstone
*A1	1B.2 S2.2(CEQA) G2	Cirsium andrewsii	Franciscan thistle	Freshwater Marsh, Serpentine or Serpentine-derived soils, Miscellaneous
A2	CEQA	Cirsium quercetorum	brownie thistle	Grassland (Annual or Perennial), Woodland
A1	CEQA	Cirsium remotifolium var. odontolepis	remote-leaved thistle	Forest, Grassland (Annual or Perennial), Serpentine or Serpentine-derived soils, Woodland
A2	CEQA	Clarkia biloba subsp. biloba	lobed godetia	Serpentine or Serpentine-derived soils, Woodland
*A1	4.3 S3.3(CEQA) G5?T3	Clarkia concinna subsp. automixa	Santa Clara red ribbons	Woodland
*A1	1B.1 S1.1(CEQA) G1 CE FE	Clarkia franciscana	Presidio clarkia	Serpentine or Serpentine-derived soils
A2	CEQA	Clarkia purpurea subsp. purpurea	purple clarkia	Grassland (Annual or Perennial)
A2	CEQA	Clarkia purpurea subsp. viminea	large godetia	Miscellaneous
A2	CEQA	Claytonia gypsophiloides	coast range montia	Rock, Tallus, Scree, Serpentine or Serpentine-derived soils
A1	CEQA	Clintonia andrewsiana	red clintonia	Redwood Forest
A1	CEQA	Collinsia bartsiifolia var. stricta	white Chinese houses	Sand, Sandstone
A2	CEQA	Collinsia parviflora	blue-eyed Mary	Miscellaneous
A1	CEQA	Collomia heterophylla	variable-leaf collomia	Rock, Tallus, Scree, Sand, Sandstone
A2	CEQA	Corallorhiza maculata var. maculata	spotted coralroot	Forest, Woodland
A1	CEQA	Corallorhiza striata	striped coralroot	Forest, Woodland
A1	CEQA	Cornus glabrata	brown dogwood	Riparian
A1	CEQA	Cryptantha clevelandii var. florosa	Cleveland's cryptantha	Chaparral, Rock, Tallus, Scree, Sand, Sandstone, Serpentine or Serpentine-derived soils

A1	CEQA	Cryptantha intermedia var. intermedia	common cryptantha	Forest, Rock, Tallus, Scree, Sand, Sandstone, Woodland
A1	CEQA	Cryptantha micromeres	minute-flowered cryptantha	Burns, Chaparral, Woodland
A1	CEQA	Cryptantha microstachys	Tejon cryptantha	Chaparral, Woodland
A2	CEQA	Cryptantha muricata var. unknown	prickly cryptantha	Rock, Tallus, Scree, Sand, Sandstone
A2	CEQA	Cryptantha torreyana var. pumila	Torrey's cryptantha	Forest, Open Dry Slope
A2	CEQA	Cuscuta californica var. californica	California dodder	Chaparral, Grassland (Annual or Perennial), Miscellaneous
A2	CEQA	Cyperus erythrorhizos	red-rooted cyperus	Riparian
A2	CEQA	Cyperus niger	black sedge	Miscellaneous, Miscellaneous Wetlands
A1	CEQA	Cyperus odoratus	coarse cyperus	Miscellaneous Wetlands
A2	CEQA	Datisca glomerata	durango root	Dry Wash, Riparian
A2	CEQA	Deinandra corymbosa	coast tarweed	Coastal Bluff, Grassland (Annual or Perennial)
A2	CEQA	Delphinium californicum subsp. californicum	coast larkspur, California larkspur	Chaparral
A2	CEQA	Dendromecon rigida	bush poppy	Burns, Chaparral, Scrub (Coastal or Interior)
A2	CEQA	Deschampsia cespitosa subsp. holciformis	tufted hairgrass	Miscellaneous Wetlands
A2	CEQA	Dicentra formosa	Pacific bleeding heart, bleeding heart	Forest, Redwood Forest, Miscellaneous
A1?	CEQA	Dichelostemma volubile	twining brodiaea, snake lily	Scrub (Coastal or Interior), Woodland
*A2	1B.2 S2S3(CEQA) G2G3	Dirca occidentalis	western leatherwood	Forest, Riparian, Scrub (Coastal or Interior)
A1	CEQA	Dudleya cymosa subsp. cymosa	spreading dudleya	Rock, Tallus, Scree, Woodland
A1	CEQA	Dudleya farinosa	bluff lettuce, powdery dudleya	Rock, Tallus, Scree
A2	CEQA	Echinodorus berteroi	burhead	Freshwater Marsh
A1	CEQA	Eclipta prostrata	false daisy	Miscellaneous Wetlands
A2	CEQA	Ehrendorferia chrysantha	golden ear-drops	Burns, Open Dry Slope, Miscellaneous
A1	CEQA	Elatine brachysperma	waterwort	Freshwater Marsh, Miscellaneous Wetlands
A1	CEQA	Elatine californica	waterwort	Freshwater Marsh
A2	CEQA	Elymus elymoides var. elymoides	squirreltail	Grassland (Annual or Perennial)
A2	CEQA	Elymus stebbinsii	Stebbins' wheat grass, Parish's wheat-grass	Chaparral, Open Dry Slope, Forest
A2	CEQA	Elymus xhansenii	Hansen squirreltail	Grassland (Annual or Perennial)
A2	CEQA	Emmenanthe penduliflora var. penduliflora	whispering bells	Burns, Chaparral, Rock, Tallus, Scree, Scrub (Coastal or Interior), Serpentine or Serpentine-derived soils, Sand, Sandstone
A1	CEQA	Eragrostis mexicana subsp. virescens	Orcutt's eragrostis	Riparian, Sand, Sandstone, Miscellaneous
A2	CEQA	Ericameria arborescens	golden-fleece	Chaparral, Forest, Woodland
A2	CEQA	Erigeron petrophilus var. petrophilus	rock daisy	Rock, Tallus, Scree, Serpentine or Serpentine-derived soils
A2	CEQA	Eriogonum angulosum	angle-stem wild buckwheat, angle-stemmed eriogonum	Sand, Sandstone, Miscellaneous
A2	CEQA	Eriogonum fasciculatum var. foliolosum	leafy California buckwheat, California buckwheat	Open Dry Slope
*A1	1B.2 S2(CEQA) G5T2	Eriogonum luteolum var. caninum	Tiburon buckwheat	Grassland (Annual or Perennial), Serpentine or Serpentine-derived soils
A2	CEQA	Eriogonum luteolum var. luteolum	golden-carpet wild buckwheat, golden carpet	Gravel, Serpentine or Serpentine-derived soils, Sand, Sandstone
A2	CEQA	Eryngium armatum	coastal button-celery, coast coyote-thistle	Vernal Pool, Miscellaneous Wetlands

A2	CEQA	Eschscholzia caespitosa	tufted poppy	Chaparral
A1	CEQA	Euonymus occidentalis var. occidentalis	burning bush	Riparian
A2	CEQA	Festuca elmeri	Elmer's fescue	Riparian
A2	CEQA	Fraxinus dipetala	California ash, flowering ash	Chaparral, Woodland, Miscellaneous
*A2	4.2 S3.2(CEQA) G3	Fritillaria agrestis	stinkbells	Alkali Areas, Grassland (Annual or Perennial)
*A1	1B.2 S2.2(CEQA) G2	Fritillaria liliacea	fragrant fritillary	Grassland (Annual or Perennial), Serpentine or Serpentine-derived soils, Vernal Pool
*A2	4.2 S3.2(CEQA) G5T3	Galium andrewsii subsp. gatense	phlox-leaf serpentine bedstraw, serpentine bedstraw	Chaparral, Serpentine or Serpentine-derived soils, Woodland
A1	CEQA	Galium trifidum subsp. columbianum	trifid bedstraw	Miscellaneous Wetlands
A1	CEQA	Gaultheria shallon	salal	Forest, Redwood Forest
A2	CEQA	Gilia achilleifolia subsp. unknown	California gilia	Miscellaneous
A2	CEQA	Gilia capitata subsp. unknown	blue field gilia	Rock, Tallus, Scree, Sand, Sandstone
A2	CEQA	Githopsis diffusa subsp. robusta	southern bluecup	Burns, Miscellaneous
A1	CEQA	Glaux maritima	sea-milkwort	Alkali Areas, Salt Marsh, Miscellaneous Wetlands
A1	CEQA	Glyceria leptostachya	narrow manna grass, Davy's mannagrass	Freshwater Marsh, Riparian
A2	CEQA	Glyceria xoccidentalis	western manna grass	Miscellaneous Wetlands
A2	CEQA	Helenium bigelovii	Bigelow's sneezeweed	Brackish Marsh, Freshwater Marsh
A1	CEQA	Helianthella californica var. californica	California helianthella	Grassland (Annual or Perennial), Woodland
*A2	1B.2 S2(CEQA) G2	Helianthella castanea	Diablo helianthella	Chaparral, Grassland (Annual or Perennial), Woodland
A2	CEQA	Hesperevax acaulis var. ambusticola	fire evax	Burns, Open Dry Slope, Miscellaneous
*A2	4.2 S3.2(CEQA) G3	Hesperevax caulescens	hogwallow starfish	Vernal Pool
A2	CEQA	Hesperolinon californicum	California dwarf flax	Grassland (Annual or Perennial), Rock, Tallus, Scree, Serpentine or Serpentine-derived soils
A1x	CEQA	Hesperomecon linearis	narrow-leaved meconella	Dry Wash, Grassland (Annual or Perennial), Sand, Sandstone
A2	CEQA	Heterocodon rariflorum	heterocodon	Miscellaneous Wetlands
A1	CEQA	Heterotheca oregona var. scaberrima	Oregon goldenaster	Dry Wash
A1x	CEQA	Hoita orbicularis	round-leaved psoralea	Riparian, Miscellaneous
*A1x	1B.1 S2(CEQA) G2	Hoita strobilina	Loma Prieta hoita	Chaparral, Woodland
*A1	1B.1 S1.1(CEQA) G1 CE FT	Holocarpha macradenia	Santa Cruz tarplant	Grassland (Annual or Perennial)
A1	CEQA	Holozonia filipes	whitecrown, holozonia	Dry Wash, Riparian
A1	CEQA	Horkelia californica var. californica	California horkelia	Grassland (Annual or Perennial), Scrub (Coastal or Interior)

A2	CEQA	Horkelia californica var. elata	tall horkelia	Riparian, Miscellaneous Wetlands
A1?	CEQA	Hosackia oblongifolia var. oblongifolia	narrow-leaved lotus	Freshwater Marsh
A1	CEQA	Hosackia stipularis var. stipularis	stipulate lotus	Chaparral
A1	CEQA	Hypericum scouleri	Scouler's st. john's wort, Scouler's St. John's wort	Freshwater Marsh, Riparian
A2	CEQA	Iris douglasiana	Douglas iris	Miscellaneous
*A1	4.2 S3.2(CEQA) G3	Iris longipetala	coast iris	Miscellaneous
*A1x?	1B.1 S1.1(CEQA) G1	Isocoma arguta	Carquinez goldenbush	Brackish Marsh
A2	CEQA	Isoetes howellii	Howell's quillwort	Miscellaneous Wetlands
*A2	1B.1 S1.1(CEQA) G1	Juglans hindsii	northern California black walnut, Northern California black	Riparian
A2	CEQA	Juncus articulatus subsp. articulatus	jointed rush	Miscellaneous
A1	CEQA	Juncus oxymeris	pointed rush	Scrub (Coastal or Interior), Miscellaneous
A2	CEQA	Juncus phaeocephalus var. unknown	brown-headed rush	Miscellaneous Wetlands
A1	CEQA	Kopsiopsis strobilacea	California ground-cone	Chaparral, Sand, Sandstone, Woodland
*A2	1B.2 S2.2(CEQA) G5T2	Lathyrus jepsonii var. jepsonii	delta tule pea, Delta tule pea	Brackish Marsh, Freshwater Marsh
A2	CEQA	Layia chrysanthemoides	smooth layia	Grassland (Annual or Perennial)
A2	CEQA	Layia gaillardioides	woodland layia	Scrub (Coastal or Interior), Woodland
A1x	CEQA	Layia glandulosa	white layia	Sand, Sandstone
A2	CEQA	Layia hieracioides	tall layia	Miscellaneous
A2	CEQA	Lepidium dictyotum	alkali pepper-grass	Alkali Areas
A1x	CEQA	Lepidium oblongum	wayside pepper-grass	Miscellaneous
*A1	4.2 S3.2(CEQA) G3	Leptosiphon acicularis	bristly leptosiphon, bristly linanthus	Chaparral, Grassland (Annual or Perennial), Woodland
*A1	4.2 S3.2(CEQA) G3	Leptosiphon grandiflorus	large-flowered leptosiphon, large-flowered linanthus	Grassland (Annual or Perennial), Gravel, Scrub (Coastal or Interior), Sand, Sandstone
A1	CEQA	Leptosiphon liniflorus	flax-flowered linanthus, flax-flowered leptosiphon	Scrub (Coastal or Interior), Serpentine or Serpentine-derived soils, Woodland, Miscellaneous
A2	CEQA	Leptosiphon pygmaeus subsp. continentalis	pygmy linanthus, pygmy leptosiphon	Miscellaneous
A1	CEQA	Leptosyne stillmanii	Stillman's coreopsis	Chaparral, Grassland (Annual or Perennial), Serpentine or Serpentine-derived soils, Woodland
A1	CEQA	Ligusticum apiifolium	Pacific lovage	Coastal Bluff, Grassland (Annual or Perennial), Scrub (Coastal or Interior), Woodland
A2	CEQA	Lilium pardalinum subsp. pardalinum	leopard lily	Freshwater Marsh, Riparian
A1	CEQA	Limnanthes douglasii subsp. douglasii	meadowfoam	Vernal Pool, Miscellaneous Wetlands
A2	CEQA	Limosella acaulis	southern mudwort	Miscellaneous Wetlands
A2	CEQA	Lithophragma bolanderi	Bolander starflower	Miscellaneous
A1?	CEQA	Ludwigia hexapetala	uruguayan primrose-willow, ludwigia	Miscellaneous Wetlands
A1	CEQA	Lupinus affinis	lupine	Miscellaneous

A2	CEQA	Lupinus arboreus	yellow bush lupine	Coastal Bluff, Coastal Strand, Sand, Sandstone
A1	CEQA	Lupinus luteolus	butter lupine	Miscellaneous
A1	CEQA	Lupinus variicolor	bluff lupine	Coastal Strand, Grassland (Annual or Perennial), Sand, Sandstone
A2	CEQA	Malacothrix floccifera	woolly malacothrix	Burns, Chaparral, Woodland, Miscellaneous
A1	CEQA	Meconella californica	California meconella	Rock, Tallus, Scree
*A2	1B.1 S1.1(CEQA) G2G3	Meconella oregana	Oregon meconella	Grassland (Annual or Perennial), Miscellaneous
A1?	CEQA	Melica bulbosa	onion grass	Forest, Rock, Tallus, Scree
A2	CEQA	Mentzelia lindleyi	Lindley's blazing star	Rock, Tallus, Scree, Scrub (Coastal or Interior), Woodland
*A1	3.2 S3.2?(CEQA) G3	Micropus amphibolus	Mount Diablo cottonseed, Mt. Diablo cottonweed	Open Dry Slope, Grassland (Annual or Perennial), Rock, Tallus, Scree
A1x	CEQA	Micropus californicus var. subvestitus	slender cottonweed	Open Dry Slope, Miscellaneous
A1x	CEQA	Microseris bigelovii	coast microseris	Coastal Bluff, Coastal Strand, Sand, Sandstone
A2	CEQA	Microseris campestris	San Joaquin microseris	Grassland (Annual or Perennial), Vernal Pool
A2	CEQA	Microseris elegans	elegant microseris	Grassland (Annual or Perennial), Vernal Pool
*A2	4.2 S3.2(CEQA) G3	Microseris sylvatica	sylvan microseris	Grassland (Annual or Perennial), Woodland
A2	CEQA	Mimulus douglasii	Douglas monkeyflower	Chaparral, Gravel, Rock, Tallus, Scree, Serpentine or Serpentine-derived soils, Woodland
A2	CEQA	Minuartia californica	California sandwort	Chaparral, Open Dry Slope, Grassland (Annual or Perennial), Rock, Tallus, Scree, Sand, Sandstone, Serpentine or Serpentine-derived soils
A2	CEQA	Minuartia pusilla	annual sandwort, least sandwort	Chaparral, Forest
A2	CEQA	Moehringia macrophylla	large-leaved sandwort, big-leaf sandwort	Forest, Rock, Tallus, Scree, Serpentine or Serpentine-derived soils, Woodland
*A1	3 S3?(CEQA) G4T3Q	Monardella antonina subsp. antonina	San Antonio hills monardella	Chaparral, Rock, Tallus, Scree, Woodland
A2	CEQA	Monardella douglasii	fenestra monardella, Fenestra monardella	Chaparral, Grassland (Annual or Perennial), Serpentine or Serpentine-derived soils, Woodland
A1	CEQA	Monardella sheltonii	Shelton's monardella	Chaparral, Forest, Rock, Tallus, Scree, Serpentine or Serpentine-derived soils, Woodland
*A2	1B.2 S2.2(CEQA) G5T2	Monardella villosa subsp. globosa	robust monardella	Chaparral, Woodland
*A1	1B.2 S2S3(CEQA) G2G3	Monolopia gracilens	woodland woollythreads, woodland monolopia	Chaparral, Grassland (Annual or Perennial), Serpentine or Serpentine-derived soils, Woodland
A1x	CEQA	Montia linearis	linear-leaved montia	Grassland (Annual or Perennial), Scrub (Coastal or Interior), Woodland
A2	CEQA	Morella californica	wax myrtle	Forest, Redwood Forest, Scrub (Coastal or Interior)
A2	CEQA	Myosurus minimus subsp. minimus	common mouse-tail	Freshwater Marsh, Vernal Pool
A1	CEQA	Navarretia leucocephala subsp. leucocephala	white-flowered navarretia	Vernal Pool
A1	CEQA	Navarretia viscidula	sticky navarretia	Freshwater Marsh, Grassland (Annual or Perennial), Sand, Sandstone, Vernal Pool
A2	CEQA	Orobanche vallicola	California broom-rape	Forest, Woodland
A1	CEQA	Oxalis oregana	redwood sorrel	Redwood Forest
A1	CEQA	Oxalis pilosa	hairy wood-sorrel	Chaparral, Grassland (Annual or Perennial), Scrub (Coastal or Interior)

A2	CEQA	Papaver californicum	fire poppy	Burns, Woodland
A1	CEQA	Pediomelum californicum	indian breadroot	Chaparral, Woodland
A2	CEQA	Penstemon heterophyllus var. purdyi	foothill penstemon	Chaparral, Forest, Grassland (Annual or Perennial)
A2	CEQA	Pentachaeta alsinoides	tiny pentachaeta	Grassland (Annual or Perennial)
A1	CEQA	Pentachaeta exilis subsp. exilis	meager pentachaeta	Grassland (Annual or Perennial)
A2	CEQA	Perideridia oregana	yampah	Open Dry Slope, Rock, Tallus, Scree, Woodland, Miscellaneous
A1	CEQA	Petasites frigidus var. palmatus	western sweet coltsfoot, coltsfoot	Riparian, Redwood Forest
A1	CEQA	Petunia parviflora	wild petunia	Dry Wash
A2	CEQA	Phacelia divaricata	divaricate phacelia	Chaparral, Grassland (Annual or Perennial), Woodland
A1	CEQA	Phacelia douglasii	Douglas' phacelia	Sand, Sandstone
A1x	CEQA	Phacelia egena	phacelia	Chaparral, Riparian, Woodland
A2	CEQA	Phacelia malvifolia	stinging phacelia	Gravel, Sand, Sandstone
A2	CEQA	Phacelia ramosissima	branching phacelia	Open Dry Slope, Dry Wash, Grassland (Annual or Perennial), Miscellaneous
A1x	CEQA	Phalaris angusta	narrow canary grass	Miscellaneous Wetlands
A2	CEQA	Phalaris arundinacea	reed canary grass	Riparian, Miscellaneous Wetlands
A1x	CEQA	Phalaris californica	California canary grass	Grassland (Annual or Perennial), Woodland
A1	CEQA	Phalaris lemmonii	Lemmon's canary-grass	Miscellaneous
A2	CEQA	Pinus attenuata	knobcone pine	Burns, Chaparral, Forest, Sand, Sandstone
A2	CEQA	Pinus coulteri	Coulter pine	Chaparral, Forest
A2	CEQA	Piperia elongata	chaparral orchid, wood rein-orchid, elongate piperia	Forest, Scrub (Coastal or Interior)
*A2	4.2 S3.2(CEQA) G3	Piperia michaelii	Michael's rein-orchid	Forest, Scrub (Coastal or Interior), Woodland
A1	CEQA	Piperia unalascensis	Alaska piperia, slender-spire orchid	Forest, Scrub (Coastal or Interior), Woodland
*A1x	1B.2 S2.2(CEQA) G3T2Q	Plagiobothrys chorisianus var. chorisianus	Choris' popcornflower	Chaparral, Grassland (Annual or Perennial), Scrub (Coastal or Interior)
*A1	1B.1 S1.1(CEQA) G1Q CE	Plagiobothrys diffusus	San Francisco popcornflower	Grassland (Annual or Perennial), Miscellaneous Wetlands
A2	CEQA	Plagiobothrys tenellus	Pacific popcornflower, slender popcornflower	Miscellaneous
A1	CEQA	Plagiobothrys undulatus	wavy-stemmed popcornflower, coast allocarya	Vernal Pool, Miscellaneous Wetlands
A1	CEQA	Plantago maritima	Pacific seaside plantain	Salt Marsh
A1x	CEQA	Platanthera dilatata var. leucostachys	white-flowered bog-orchid	Freshwater Marsh, Riparian
A2	CEQA	Plectritis congesta subsp. congesta	sea blush	Coastal Bluff, Woodland
A2	CEQA	Poa howellii	Howell's bluegrass	Chaparral, Rock, Tallus, Scree, Woodland
A1x	CEQA	Pogogyne douglasii	Douglas' beardstyle, Douglas pogogyne	Vernal Pool
*A1	2.2 S1(CEQA) G4	Polemonium carneum	Oregon polemonium, great polemonium	Miscellaneous
A1	CEQA	Polygala californica	California milkwort	Chaparral, Forest, Redwood Forest
A1	CEQA	Polypodium scouleri	leather-leaf fern	Coastal Bluff, Miscellaneous

A1	CEQA	Polystichum californicum	California sword fern	Miscellaneous
A1	CEQA	Polystichum imbricans subsp. imbricans	rock sword fern	Miscellaneous
A1	CEQA	Potentilla anserina subsp. pacifica	Pacific silverweed	Miscellaneous Wetlands
A1?	CEQA	Prosartes smithii	large-flowered fairy bell	Forest, Woodland
A1	CEQA	Prunella vulgaris var. lanceolata	selfheal	Forest, Riparian, Woodland, Miscellaneous Wetlands
A2	CEQA	Pseudognaphalium biolettii	Bioletti's cudweed	Open Dry Slope, Sand, Sandstone
A2	CEQA	Pseudognaphalium microcephalum	white everlasting	Chaparral, Open Dry Slope
A1	CEQA	Psilocarphus chilensis	round woolly marbles, round woolly-marbles	Vernal Pool, Miscellaneous Wetlands
A2	CEQA	Quercus chrysolepis	maul oak, canyon live oak, shrubby canyon oak	Chaparral, Scrub (Coastal or Interior)
A2	CEQA	Quercus durata var. durata	leather oak	Chaparral, Serpentine or Serpentine-derived soils
A1	CEQA	Quercus garryana x dumosa	Oregon oak x scrub oak	Scrub (Coastal or Interior), Woodland
A1	CEQA	Quercus garryana x durata	Oregon oak x leather oak	Chaparral, Woodland
A2	CEQA	Quercus palmeri	Palmer's oak	Rock, Tallus, Scree
A2	CEQA	Quercus parvula var. shrevei	island scrub oak	Chaparral, Woodland
A1	CEQA	Quercus xjolonensis	blue oak x valley oak	Forest, Woodland
*A2	4.2 S3.2(CEQA) G4	Ranunculus lobbii	Lobb's aquatic buttercup	Vernal Pool, Miscellaneous Wetlands
A2	CEQA	Ranunculus occidentalis var. occidentalis	western buttercup	Grassland (Annual or Perennial), Woodland
A1	CEQA	Ranunculus orthorhynchus var. bloomeri	Bloomer's buttercup	Miscellaneous Wetlands
A1x	CEQA	Ranunculus orthorhynchus var. orthorhynchus	straight-beaked buttercup	Forest, Miscellaneous Wetlands, Miscellaneous
A2	CEQA	Ribes amarum	bitter gooseberry	Chaparral
A1	CEQA	Ribes aureum var. gracillimum	golden currant	Riparian, Miscellaneous
A2	CEQA	Ribes quercetorum	oakwoods gooseberry, oak gooseberry	Chaparral, Woodland
A1	CEQA	Ribes speciosum	fuchsia-flowered gooseberry	Chaparral, Scrub (Coastal or Interior)
A2	CEQA	Rorippa curvisiliqua	yellow cress	Freshwater Marsh
A1	CEQA	Rorippa palustris subsp. palustris	marsh yellow-cress	Miscellaneous Wetlands
A1	CEQA	Rosa nutkana subsp. nutkana	Nootka rose	Miscellaneous
A1	CEQA	Rubus spectabilis	salmonberry	Riparian
A2	CEQA	Rumex californicus	willow dock	Miscellaneous Wetlands
A2	CEQA	Rumex crassus	willow dock	Coastal Bluff, Coastal Strand, Miscellaneous Wetlands
A2	CEQA	Rumex fueginus	golden dock	Brackish Marsh, Salt Marsh
A2	CEQA	Rumex transitorius	willow dock	Miscellaneous Wetlands
A1	CEQA	Sagittaria latifolia	arrowhead	Freshwater Marsh
A2	CEQA	Salix scouleriana	Scouler's willow	Miscellaneous Wetlands
A1	CEQA	Sambucus racemosa var. racemosa	red elderberry	Riparian
A1x	CEQA	Sanicula arctopoides	footsteps of spring, yellow mats	Coastal Bluff
A2	CEQA	Sanicula laciniata	coast sanicle	Chaparral, Scrub (Coastal or Interior), Woodland
A1x	CEQA	Scoliopus bigelovii	fetid adder's tongue, slink pod	Redwood Forest
A2	CEQA	Scutellaria californica	California skullcap	Scrub (Coastal or Interior), Woodland, Miscellaneous
A2	CEQA	Selaginella bigelovii	spike-moss	Miscellaneous
A1	CEQA	Senecio hydrophilus	water ragwort, alkali-marsh ragwort, alkali-	Miscellaneous Wetlands

			marsh butterweed	
A2	CEQA	Sesuvium verrucosum	western sea-purslane, sea-purslane	Alkali Areas
A2	CEQA	Setaria parviflora	knotroot bristle grass, perennial foxtail	Chaparral, Grassland (Annual or Perennial)
A2	CEQA	Sidalcea diploscypha	fringed checkerbloom, fringed sidalcea	Grassland (Annual or Perennial), Woodland
A1	CEQA	Sisyrinchium californicum	golden-eyed-grass	Freshwater Marsh
A1?	CEQA	Solanum xanti	purple nightshade	Forest, Scrub (Coastal or Interior), Woodland
A2	CEQA	Spergularia macrotheca var. macrotheca	large-flowered sand spurry	Alkali Areas, Coastal Bluff, Rock, Tallus, Scree, Miscellaneous Wetlands
A1	CEQA	Spiranthes porrifolia	western ladies' tresses	Miscellaneous Wetlands
A1	CEQA	Spiranthes romanzoffiana	hooded ladies' tresses	Coastal Bluff, Freshwater Marsh
A2	CEQA	Stachys ajugoides	bugle hedge nettle	Miscellaneous Wetlands
A1?	CEQA	Stachys bullata	California hedge nettle	Open Dry Slope, Miscellaneous
A2	CEQA	Stephanomeria elata	stephanomeria	Open Dry Slope
*A2	1B.2 S2.2(CEQA) G2T2	Streptanthus albidus subsp. peramoenus	most beautiful jewel-flower	Chaparral, Open Dry Slope, Grassland (Annual or Perennial), Serpentine or Serpentine-derived soils
*A1	2.2 S1S2(CEQA) G5	Stuckenia filiformis subsp. alpina	slender-leaved potamogeton	Freshwater Marsh, Riparian, Miscellaneous Wetlands
A2	CEQA	Stylocline gnaphaloides	everlasting neststraw, nest-straw	Sand, Sandstone, Miscellaneous
A2	CEQA	Symphyotrichum lanceolatum var. hesperium	marsh aster	Miscellaneous, Riparian, Miscellaneous Wetlands
A2	CEQA	Tetrapteron graciliflorum	hill sun cup	Open Dry Slope, Grassland (Annual or Perennial), Scrub (Coastal or Interior), Woodland
A1x	CEQA	Thermopsis californica var. californica	santa ynez false-lupine, false-lupine	Chaparral, Grassland (Annual or Perennial), Woodland
A2	CEQA	Thysanocarpus radians	ribbed fringe pod	Miscellaneous
A1	CEQA	Tolmiea diplomenziesii	pig-a-back plant	Riparian
A1	CEQA	Trianthema portulacastrum	horse purslane	Miscellaneous Wetlands
A2	CEQA	Trifolium barbigerum	bearded clover	Miscellaneous
A2	CEQA	Trifolium lilacinum	Gray's clover	Miscellaneous
A1	CEQA	Trifolium macraei	Macrae's clover, double-headed clover	Sand, Sandstone, Miscellaneous
A2	CEQA	Trifolium olivaceum	olive clover	Miscellaneous
A2	CEQA	Trifolium wormskioldii	cow clover	Miscellaneous Wetlands
A2	CEQA	Triglochin striata	three-ribbed arrow-grass	Salt Marsh
A2	CEQA	Trillium ovatum subsp. ovatum	white trillium	Forest, Redwood Forest
A2	CEQA	Triodanis biflora	Venus' looking-glass	Burns, Miscellaneous
A2	CEQA	Triphysaria versicolor subsp. faucibarbata	smooth owl's-clover	Grassland (Annual or Perennial)
A2	CEQA	Trisetum canescens	tall trisetum	Forest, Miscellaneous
A1x	CEQA	Vancouveria planipetala	redwood ivy, inside-out flower	Forest
*A2	2.3 S2.3(CEQA) G5	Viburnum ellipticum	oval-leaved viburnum	Chaparral
A2	CEQA	Vicia hassei	slender vetch	Grassland (Annual or Perennial), Scrub (Coastal or Interior)
A1	CEQA	Viola adunca subsp. adunca	western blue violet	Forest
A2	CEQA	Viola glabella	stream violet, smooth yellow violet	Forest, Riparian

A1	CEQA	Viola sempervirens	evergreen violet, redwood violet	Redwood Forest

NOTE: Some of these plant species are only known from the area historically and have not been reported for quite some time. It should not necessarily be assumed, however, that they no longer exist here as they may be on private land or hard-to-reach areas where surveys have not been done for a long time, if ever. In recent years, several plant species have been rediscovered in the East Bay that had not been reported in the area since the late 1800's or early 1900's.

Dates indicated for historical species in the species name column refer to the last known record in the Alameda-Contra Costa Counties area, not necessarily the area described in the title.

Explanation of Ranks

***A1 or *A2**: Species in Alameda and Contra Costa counties listed as rare, threatened or endangered statewide by federal or state agencies or by the state level of CNPS.

A1x: Species previously known from Alameda or Contra Costa Counties, but now presumed extirpated here.

A1: Species currently known from 2 or less regions in Alameda and Contra Costa Counties.

A2: Species currently known from 3 to 5 regions in the two counties, or, if more, meeting other important criteria such as small populations, stressed or declining populations, small geographical range, limited or threatened habitat, etc.

A1?: Species with taxonomic or distribution problems that make it unclear if they actually occur here.

Appendix B

EBCNPS Comment Letter RE: Notice of Intent for the Environmental Impact Statement on **FEMA–2010–0037, Hazardous Fire Risk Reduction, East Bay Hills, CA. October 2010**

California Native Plant Society
East Bay Chapter
Conservation Committee

October 1, 2010

Office of Chief Counsel, Federal Emergency
Management Agency, 500 C Street, SW.,
Room 835, Washington, DC 20472–3100

RE: Docket ID: FEMA–2010–0037, Hazardous Fire Risk Reduction, East Bay Hills, CA

Dear Sir/Madam:

The East Bay Chapter of the California Native Plant Society (EBCNPS) appreciates the opportunity to comment on the Notice of Intent for the Environmental Impact Statement on **FEMA–2010–0037, Hazardous Fire Risk Reduction, East Bay Hills, CA**. The California Native Plant Society (CNPS) is a non-profit organization of more than 10,000 laypersons, professional and academic botanists organized into 33 chapters throughout California. The mission of the CNPS is to increase the understanding and appreciation of California's native plants and to preserve them in their natural habitat through scientific activities, education, and conservation.

The East Bay Chapter of CNPS (EBCNPS) has been involved with protecting and conserving native plant resources in the East Bay Hills for some 47 years now. These East Bay Hills are rich with native vegetation and rare and unusual plants that often are found nowhere else in the two-county East Bay area. The East Bay Hills are home to a large number of endangered, threatened, and locally rare plants which could be affected by fuels management projects. EBCNPS wants to ensure that the EIS will address potential impacts to these plants. Appendix A provides a list of CEQA protected A-ranked plants, or plants that are locally rare, including federally listed and state listed plants.

We recognize that there is a frightening wildfire potential each fall for some residents living in the East Bay Hills. This potential exists because of the combination of extreme weather events (Diablo winds), the pattern of residential development in the hills, the proximity of flammable homes to fire-prone vegetation, and the lack of adequate preparation to the urban infrastructure, including defensible space [excerpted from our paper, "Managing the East Bay Hills WUI to Preserve Native Habitat and Reduce the Risk of Catastrophic Fire", Appendix B].

This paper, co-authored with Sierra Club and Golden Gate Audubon, was submitted to the East Bay Park District during their Fuels Management EIR process. We believe that it is applicable to this project and helps provide insight and information from three environmentally motivated organizations. In addition to providing this paper and other letters to responsible parties, EBCNPS continues to be in contact with landowners and land managers in the East Bay Hills, including the City of Oakland and EBRPD, helping ensure that the fuels management plans for these hills will not negatively impact native vegetation. In fact, in many cases we're working

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together to produce a win-win situation wherein both fuel reduction goals are met while native plant habitat is maintained and even improved in some situations.

EBCNPS supports many of the concepts presented in the Sierra Club (SC) letter (Norman LaForce, September 12th, 2010) submitted during this project scoping process. EBCNPS has been working assiduously with a number of local conservation groups, including the Sierra Club, Golden Gate Audubon Society, Friends of Sausal Creek, and the Claremont Canyon Conservancy, to help identify resources and educate the public and decision-makers about the ecological value of these resources. We firmly agree with the second (2) point in the SC letter that the EIS needs to be grounded in "verifiable wildfire science, reliable resource protection/management science, and expert opinions".

The role of FEMA, as a potential funder of these wildfire reduction plans, should be to review the documents submitted not only for the quality of the project presented, but also for the foundation upon which the proposals were written. We hope that FEMA would uphold grantees to an extremely high standard and require the projects to explicitly state their assumptions and the background information they have used to inform the proposed project. Although we understand that all of the projects highlighted in the scoping session (e.g., City of Oakland, University of California, EBRPD) have already submitted proposals, we believe that it is not too late to assess the quality of these projects for the following parameters:

1. What type of fuel model is used to create the recommendations for fuels treatment? Is the model generalized from another area or is it based on vegetation found in the East Bay Hills and on an understanding of local weather phenomena?

2. Was the project proposal written with a demonstrated knowledge of the *site-specific* natural resources and land conditions for each project? Did the project proposal team include an ecologist, biologist, and botanist in order to help ensure that the project will not create additional impacts to the environment? Was vegetation mapped at the appropriate scale for each project? Since many projects will occur on a small scale, it should be required that vegetation is mapped to the standards of the *Manual of California Vegetation – 2nd Edition*, so that resources and impacts to resources can be assessed at the proper scale.

3. Do the proposals mention that they are working in "living landscapes"? Do these proposals take into account the fact that the living environment will "respond" to the changes proposed in each fuels management plan? The response of a living landscape to perturbation isn't always easy to predict, therefore, does the proposed project include a number of possible scenarios that will occur 1, 5, and 10 years after the initial fuels treatment? Does the project proponent have access to stable funding that will be able to deal with costs of additional contingencies (i.e., erosion, invasive species spread, etc.) that might arise after the FEMA funds are spent? How are these additional funds to be spent if everything proceeds as planned?

4. Does the project proponent offer a clear and complete maintenance and monitoring plan that will be initiated once the initial treatment is concluded?

5. Each project should have an approved Environmental Impact Report, or similar duly prepared legal document, that has been properly noticed to the public and approved by the proper agencies. The completion of the environmental review process, by the applicant, should be a requirement before any project commences.

6. What is the track record of the applicant to finish projects as proposed? Since all of the applicants have some history with fuels management work, how will past performance be assessed for each applicant?

7. Does the applicant have an informed program for contending with weed and invasive species that may colonize the site after fuels treatment?

8. Does the applicant have a technical advisory committee that would be helpful when potential problems arise with fuels treatments or follow up monitoring?

General Considerations

FEMA's EIS is required to consider all potential impacts that may occur from the act of FEMA funding fuels reduction projects in the East Bay Hills. Given the history of fire in the East Bay Hills, fear is a strong motivator for action that will help minimize the risk of catastrophic fire. Although we agree that FEMA should act as quickly as possible, it does serve public safety or our ecological heritage to act too quickly without considering the long-term consequences of this scale of environmental manipulation. There are many associated impacts that could be exaggerated with a poor fuels management plan, including but not limited to, flooding, erosion, deterioration of water quality, deterioration of habitat for native flora and fauna, increased land slides, and most importantly, increased risk of fire. We hope that FEMA clearly understands its responsibilities if a fuels project has unintended consequences. We would like the document to clearly outline FEMA's actions after a project is approved, from contracts to reporting to follow-up and enforcement.

FEMA's EIS should include information on cumulative impacts to habitat. Since this project will fund several million dollars of fuels work in the East Bay Hills, we believe that the funder of this work should be required to take a landscape scale perspective of the greater proposed project area. In this case, it seems likely that almost all of the impacts will fall upon a relatively small area – the Berkeley and Oakland "Hills" areas where the urban areas are carved into steep hills and lie adjacent to wildlands (parks, preserves, watershed lands). EBCNPS asks that the EIS clearly state the acreage of each habitat type that will be affected and what habitat types will replace these. We request that vegetation mapping be done at a fine scale and that vegetation be reported as a vegetation type in accordance with the *Manual of California Vegetation - 2nd Edition.*

FEMA's EIS should include an impact analysis on the increase of the spread of invasive plants from the proposed action. In addition, to help minimize the potential of increasing weed invasion, we hope the EIS will clearly outline Best Management Practices as mitigation for all grantees and contracts and enforce penalties if those BMPs are not implemented as agreed. At least two mechanisms, with regard to invasive species spread, will be at play when a fuels reduction project is undertaken. First, the actual act of bringing in machinery for fuels treatment purposes poses a risk to the site. The equipment may be contaminated with seeds or vegetative plant parts from another site and deposit weeds that were previously not known from the immediate site. Second, the process of soil disturbance is one of the major factors in increasing weed populations, as well as introducing new colonizers. Barren soil or soil that has been disturbed by machinery or mechanical tools is more likely to be colonized by invasive species than soil which remains intact. Most of our invasive plants thrive in disturbed soils, and fuels management work therefore provides a vector by which weeds can spread. In some cases, the implications of increased weed biomass can be significant. Many weeds are extremely competitive and produce large amounts of biomass that crowd out native plants. As a result, often the weeds can be as great or greater a fire hazard than the native vegetation that was managed for fuel load. EBCNPS believes that this scenario needs to be addressed in the EIS and FEMA should be clear about monitoring requirements over the course of 2-5 years to ensure that this will not be the outcome of the proposed projects. We believe FEMA should require annual project reports for 3 to 5 years and require that the grantee make these reports easily available to the public.

FEMA's EIS should require monitoring for all projects that it approves and funds. As stated in the above points, monitoring will help ensure that projects are compliant with FEMA standards, and even more importantly, that environmental conditions have not been degraded for resources, people, or wildlife at the cost of fuels management. Although FEMA has clearly stated that its funding cannot go towards monitoring and follow-up activities, it should require that an agency has matching funding at a rate of 1:3 or 1:4 for monitoring and follow-up activities that are needed for a successful project. Projects that lack monitoring and follow-up often produce less desirable results and can negatively impact the project site. FEMA's EIS should clearly state that the funding for any approved project has the appropriate matching funds (at a reasonable ratio) so that monitoring and follow-up tasks can make FEMA-funded projects successful and accountable to the community in which they take place.

Thank you for your consideration of the above comments. Please do not hesitate to contact me with questions at (510) 734-0335.

Sincerely,

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

APPENDIX A: CEQA protected A-Ranked Plants known from the East Bay Hills

East Bay Rarity Rank	Species Name	Common Name	Habitat
A1	Acer negundo var. unknown (var. californicum is the most common)	box-elder	Riparian
A2	Adiantum aleuticum (A. jordanii is more common)	five-finger fern	Riparian
A1	Agoseris apargioides var. apargioides	seaside agoseris	Forest; Grassland; Scrub; Sand or Sandstone
A2	Allium falcifolium	sickle-leaved onion	Rock, Tallus or Scree; Serpentine
A2	Alnus rubra (A. rhombifolia is more common)	red alder	Riparian
A1	Ammannia coccinea	long-leaved ammannia	Riparian areas; Misc. Wetlands
A1x	Amsinckia douglasiana (historical-1938)	Douglas' fiddleneck	Dry Open Slopes; Rock, Tallus or Scree
*A2	AMSINCKIA LUNARIS	bent-flowered fiddleneck	Grassland; Woodland; Misc. habitats
A1	Anisocarpus madioides (Madia madioides in Jepson Manual)	woodland madia	Forest; Redwood Forest; Woodland
A2	Apiastrum angustifolium	wild celery	Chaparral; Scrub
A2	Arctostaphylos glandulosa ssp. glandulosa	Eastwood manzanita	Chaparral
*A1	ARCTOSTAPHYLOS PALLIDA	pallid manzanita	Chaparral; Sand or Sandstone
A2	Asclepias speciosa (A. californica is more common)	milkweed	Misc. habitats
A2	Aster lanceolatus ssp. hesperius	marsh aster	Riparian areas; Misc. Wetlands; Misc. habitats
*A1	ASTRAGALUS TENER VAR. TENER	alkali milk-vetch	Alkali areas; Grassland; Vernal Pools; Misc. Wetlands
A1x	Atriplex patula ssp. obtusa (historical-1897)	spear saltbush	Alkali areas
*A1	BALSAMORHIZA MACROLEPIS VAR. MACROLEPIS	big-scale balsamroot	Grassland; Serpentine
A1x	Calamagrostis nutkaensis (historical-18??)	Pacific reed grass	Coastal Strand; Freshwater Marsh; Forest; Redwood Forest
*A2	CALOCHORTUS UMBELLATUS	Oakland star-tulip	Chaparral; Scrub; Woodland
A1	Calycadenia multiglandulosa	sticky calycadenia	Rock, Tallus or Scree; Scrub
A2	Camissonia graciliflora	hill sun cup	Dry Open Slopes; Grassland; Scrub; Woodland
A1	Carex brevicaulis	short-stemmed sedge	Rock, Tallus or Scree; Sand or Sandstone areas
A2	Carex densa	dense sedge	Misc. Wetlands; Misc. habitats
A1	Carex deweyana ssp. leptopoda	short-scaled sedge	Misc. Wetlands; Misc. Habitats
A1	Carex dudleyi	Dudley's sedge	Misc. Wetlands
A1	Carex globosa	round-fruited sedge	Misc. habitats

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A1x	Carex gracilior (historical-1939)	slender sedge	Forest; Grassland; Misc. Wetlands; Misc. habitats
A2	Carex multicostata	many-ribbed sedge	Misc. habitats
A1	Carex obnupta	slough sedge	Misc. Wetlands
A1	Castilleja ambigua ssp. ambigua	Johnny-nip	Coastal Bluff; Grassland
A2	Castilleja subinclusa ssp. franciscana	Franciscan Indian paintbrush	Chaparral; Scrub
A2	Ceanothus thyrsiflorus var. thyrsiflorus	blue blossom; California-lilac	Misc. habitats
A1	Chorizanthe polygonoides var. polygonoides	knotweed spineflower	Gravel; Sand or Sandstone
A2	Chrysolepis chrysophylla var. minor	golden chinquapin	Chaparral; Forest; Sand or Sandstone
A2	Cirsium quercetorum	brownie thistle	Grassland; Woodland
*A1	CLARKIA FRANCISCANA	Presidio clarkia	Serpentine
A2	Clarkia purpurea ssp. viminea (ssp. quadrivulnera is more common)	large godetia	Misc. habitats
A1	Clintonia andrewsiana	red clintonia	Redwood Forest
A2	Collomia heterophylla	varied-leaved collomia	Rock, Tallus or Scree; Sand or Sandstone areas
A2	Corallorhiza maculata fma. maculata (forma immaculata is more common)	spotted coralroot	Forest; Woodland
A1	Corallorhiza striata (C. maculata is more common)	striped coralroot	Forest; Woodland
A1	Coreopsis stillmanii	Stillman's coreopsis	Chaparral; Grassland; Serpentine; Woodland
A1	Cryptantha micromeres	minute-flowered cryptantha	Chaparral; Woodland
A2	Cryptantha muricata	prickly cryptantha	Rock, Tallus or Scree; Sand or Sandstone areas
A2	Cryptantha torreyana	Torrey's cryptantha	Dry Open Slopes; Forest
A2	Cyperus erythrorhizos	red-rooted cyperus	Riparian
A2	Deinandra corymbosa ssp. corymbosa (Hemizonia corymbosa in Jepson Manual)	coast tarweed	Coastal Bluff; Grassland
A2	Dendromecon rigida	bush poppy	Burns; Chaparral; Scrub
A2	Deschampsia cespitosa ssp. holciformis	tufted hairgrass	Misc. Wetlands
A2	Dicentra formosa	bleeding heart	Forest; Redwood Forest; Misc. habitats
A1?	Dichelostemma volubile(?)	twining brodiaea	Scrub; Woodland
*A2	DIRCA OCCIDENTALIS	western leatherwood	Forest; Riparian; Scrub
A1?	Disporum smithii(?) (D. hookeri is more common)	large-flowered fairy bell	Forest; Woodland
A2	Echinodorus berteroi	burhead	Freshwater Marsh
A2	Elymus glaucus ssp. jepsonii (ssp. glaucus is more common)	blue wildrye	Grassland
A2	Elymus X hansenii	Hansen squirreltail	Grassland
A1	Eragrostis mexicana ssp.	Orcutt's eragrostis	Riparian areas; Sand or Sandstone

	virescens		areas; Misc. habitats
A2	Ericameria arborescens	golden-fleece	Chaparral; Forest; Woodland
A2	Erigeron petrophilus var. petrophilus	rock daisy	Rock, Tallus or Scree; Serpentine
*A1	ERIOGONUM LUTEOLUM VAR. CANINUM	Tiburon buckwheat	Grassland; Serpentine
A2	Eriogonum luteolum var. luteolum	golden carpet	Gravel; Sand or Sandstone; Serpentine
*A2	ERODIUM MACROPHYLLUM	round-leaved filaree	Grassland; Scrub
A2	Festuca elmeri	Elmer's fescue	Riparian
*A1	FRITILLARIA LILIACEA	fragrant fritillary	Grassland; Serpentine; Vernal Pools
*A2	GALIUM ANDREWSII SSP. GATENSE	serpentine bedstraw	Chaparral; Serpentine; Woodland
A1	Gaultheria shallon	salal	Forest; Redwood Forest
A2	Githopsis diffusa ssp. robusta	southern bluecup	Burns; Misc. habitats
A2	Gnaphalium bicolor	Bioletti's cudweed	Dry Open Slopes; Sand or Sandstone
A2	Gnaphalium canescens ssp. microcephalum	white everlasting	Chaparral; Dry Open Slopes
*A2	HELIANTHELLA CASTANEA	Diablo helianthella	Chaparral; Grassland; Woodland
A2	Hesperolinon californicum	California dwarf flax	Grassland; Rock, Tallus or Scree; Serpentine
A1x	Hierochloe occidentalis (historical-198? but not seen since)	vanilla grass	Forest; Redwood Forest
A2	Hoita macrostachya	California hemp	Freshwater Marsh; Riparian
A1x	Hoita orbicularis (historical-1936)	round-leaved psoralea	Riparian areas; Misc. habitats
*A1x	HOITA STROBILINA (HISTORICAL-1865)	Loma Prieta hoita	Chaparral; Woodland
A2	Hordeum jubatum	foxtail barley	Misc. habitats
A1	Horkelia californica ssp. californica	California horkelia	Grassland; Scrub
*A1x	HORKELIA CUNEATA SSP. SERICEA (HISTORICAL-1894)	Kellogg's horkelia	Grassland; Scrub; Sand or Sandstone
A1	Hypericum formosum var. scouleri	Scouler's St. John's wort	Freshwater Marsh; Riparian
A2	Iris douglasiana	Douglas iris	Misc. habitats
A1	Iris longipetala	field iris	Misc. habitats
*A2	LATHYRUS JEPSONII VAR. JEPSONII	Delta tule pea	Brackish Marsh; Freshwater Marsh
A2	Layia gaillardioides	woodland layia	Scrub; Woodland
A1x	Layia glandulosa (historical-1983 but not seen since)	white layia	Sand or Sandstone
A2	Layia hieracioides	tall layia	Misc. habitats
A1x	Lepidium oblongum var. oblongum (historical-1937)	wayside pepper-grass	Misc. habitats
A1	Ligusticum apiifolium	Pacific lovage	Coastal Bluff; Grassland; Scrub; Woodland
A2	Lilium pardalinum ssp.	leopard lily	Freshwater Marsh; Riparian

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	pardalinum		
*A1	LINANTHUS ACICULARIS	bristly linanthus	Chaparral; Grassland; Woodland
A1	Linanthus liniflorus	flax-flowered linanthus	Scrub; Serpentine; Woodland; Misc. habitats
A2	Lithophragma bolanderi	Bolander starflower	Misc. habitats
A2	Lomatium caruifolium var. caruifolium	caraway-leaved lomatium	Grassland; Vernal Pool; Misc. habitats
A1	Lotus stipularis var. stipularis	stipulate lotus	Chaparral
A1	Lupinus affinis	lupine	Misc. habitats
A1	Lupinus bicolor var. tridentatus (var. umbellatus is more common)	miniature lupine	Misc. habitats
A1	Lupinus variicolor	bluff lupine	Coastal Strand; Grassland; Sand or Sandstone
A2	Madia elegans ssp. vernalis (ssp. densifolia is more common)	common madia	Grassland
A1x	Meconella linearis (historical-1983 but not seen since)	narrow-leaved meconella	Dry Washes; Grassland; Sand or Sandstone
*A2	MECONELLA OREGANA	Oregon meconella	Grassland; Misc. habitats
A1?	Melica bulbosa var. bulbosa(?)	oniongrass	Forest; Rock, Tallus or Scree
*A1	MICROPUS AMPHIBOLUS	Mt. Diablo cottonweed	Dry Open Slopes; Grassland; Rock, Tallus or Scree
A1x	Micropus californicus var. subvestitus (historical-1930) (var. californicus is more common)	slender cottonweed	Dry Open Slopes; Misc. habitats
A1x	Microseris bigelovii (historical-1891)	coast microseris	Coastal Bluff; Coastal Strand; Sand or Sandstone
A2	Mimulus douglasii	Douglas monkeyflower	Chaparral; Gravel; Rock, Tallus or Scree; Serpentine; Woodland
A2	Monardella douglasii ssp. douglasii	Fenestra monardella	Chaparral; Grassland; Serpentine; Woodland
A1	Monardella sheltonii	Shelton's monardella	Chaparral; Forest; Rock, Tallus or Scree; Serpentine; Woodland
*A2	MONARDELLA VILLOSA SSP. GLOBOSA (ssp. villosa is more common)	robust monardella	Chaparral; Woodland
A1	Monolopia gracilens	woodland monolopia	Chaparral; Grassland; Serpentine; Woodland
A2	Myrica californica	wax myrtle	Forest; Redwood Forest; Scrub
A2	Oxalis albicans ssp. pilosa	hairy wood-sorrel	Chaparral; Grassland; Scrub
A1	Oxalis oregana	redwood sorrel	Redwood Forest
A1	Perideridia oregana	yampah	Dry Open Slopes; Rock, Tallus or Scree; Woodland; Misc. habitats
A2	Petunia parviflora	wild petunia	Dry Washes
A2	Phacelia divaricata	divaricate phacelia	Chaparral; Grassland; Woodland
A2	Phacelia tanacetifolia	tansy phacelia	Gravel; Sand or Sandstone
A1x	Phalaris angusta (historical-1912)	Narrow canary grass	Misc. Wetlands

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A2	Phalaris arundinacea	reed canary grass	Riparian areas; Misc. Wetlands
A1x	Phalaris californica (historical-1943)	California canary grass	Grassland; Woodland
A1	Phalaris lemmonii	Lemmon's canary-grass	Misc. habitats
A2	Pinus attenuata	knobcone pine	Chaparral; Forest; Sand or Sandstone
A2	Piperia elongata	elongate piperia	Forest; Scrub
A1	Piperia unalascensis	Alaska piperia	Forest; Scrub; Woodland
*A1x	PLAGIOBOTHRYS CHORISIANUS VAR. CHORISIANUS (historical-1890)	Choris's popcorn flower	Chaparral; Grassland; Scrub
*A1	PLAGIOBOTHRYS DIFFUSUS	San Francisco popcorn flower	Grassland; Misc. Wetlands
A2	Plagiobothrys tenellus	slender popcornflower	Misc. habitats
A1	Polypodium scouleri	leather-leaf fern	Coastal Bluff; Misc. habitats
A1	Polystichum californicum	California sword fern	Misc. habitats
A1	Polystichum imbricans var. imbricans	rock sword fern	Misc. habitats
*A1	POTAMOGETON FILIFORMIS	slender-leaved potamogeton	Freshwater Marsh; Riparian; Misc. Wetlands
A1	Prunella vulgaris var. lanceolata (var. vulgaris is more common)	selfheal	Forest; Riparian; Woodland; Misc. Wetlands
A1	Psilocarphus tenellus var. globiferus (var. tenellus is more common)	round woolly-marbles	Vernal Pools; Misc. Wetlands
A1	Quercus parvula var. shrevii	island scrub oak	Chaparral; Woodland
A1	Ranunculus orthorhynchus var. bloomeri	Bloomer's buttercup	Misc. Wetlands
A1	Ribes amarum	bitter gooseberry	Chaparral
A1	Ribes speciosum	fuchsia-flowered gooseberry	Chaparral; Scrub
A2	Rorippa palustris var. occidentalis	marsh yellow-cress	Misc. Wetlands
A1	Rosa nutkana var. nutkana	Nootka rose	Misc. habitats
A2	Rumex maritimus	golden dock	Brackish Marsh; Salt Marsh
A2	Rumex salicifolius var. denticulatus	willow dock	Misc. Wetlands
A1	Sagittaria latifolia	arrowhead	Freshwater Marsh
A2	Salix scouleriana	Scouler's willow	Misc. Wetlands
A1	Sambucus racemosa var. racemosa	red elderberry	Riparian
A1x	Sanicula arctopoides (historical-19??)	footsteps-of-spring	Coastal Bluff
A2	Sanicula laciniata	coast sanicle	Chaparral; Scrub; Woodland
A1x	Scoliopus bigelovii (historical-18??)	fetid adder's tongue; slink pod	Redwood Forest
A2	Scutellaria californica	California skullcap	Scrub; Woodland; Misc. habitats
A2	Spergularia macrotheca var. macrotheca	large-flowered sand spurry	Alkali areas; Coastal Bluff; Rock, Tallus or Scree; Misc. Wetlands
A1	Spiranthes porrifolia	western ladies' tresses	Misc. Wetlands
A1	Spiranthes romanzoffiana	hooded ladies' tresses	Coastal Bluff, Freshwater Marsh
A1?	Stachys bullata(?) (S.	California hedge nettle	Dry Open Slopes; Misc. habitats

	ajugoides var. rigida is more common)		
A2	Stephanomeria elata	stephanomeria	Dry Open Slopes
*A2	STREPTANTHUS ALBIDUS SSP. PERAMOENUS	most beautiful jewel-flower	Chaparral; Dry Open Slopes; Grassland; Serpentine
A1x	Thermopsis macrophylla var. macrophylla (historical-1929)	false-lupine	Chaparral; Grassland; Woodland
A2	Thysanocarpus radians	ribbed fringe pod	Misc. habitats
A1	Tolmiea menziesii	pig-a-back plant	Riparian
A2	Trifolium macraei	double-headed clover	Sand or Sandstone; Misc. habitats
A2	Trifolium wormskioldii	cow clover	Misc. Wetlands
A2	Trillium ovatum ssp. ovatum	white trillium	Forest; Redwood Forest
A2	Triodanis biflora	Venus' looking-glass	Misc. habitats
A2	Triphysaria versicolor ssp. faucibarbata	smooth owl's-clover	Grassland
A2	Trisetum canescens	tall trisetum	Forest; Misc. habitats
A2	Tropidocarpum gracile	slender tropidocarpum	Alkali areas; Grassland
A1x	Vancouveria planipetala (historical-1898)	inside-out flower	Forest
A2	Vicia hassei	slender vetch	Grassland; Scrub
A1	Viola adunca	western blue violet	Forest
A2	Viola glabella	stream violet	Forest; Riparian
A1	Viola sempervirens	evergreen violet	Redwood Forest

NOTE: Some of these plant species are only known from the area historically and have not been reported for quite some time. It should not necessarily be assumed, however, that they no longer exist here as they may be on private land or hard-to-reach areas where surveys have not been done for a long time, if ever. In recent years, several plant species have been rediscovered in the East Bay that had not been reported in the area since the late 1800's or early 1900's.

Dates indicated for historical species in the species name column refer to the last known record in the Alameda-Contra Costa Counties area, not necessarily the area described in the title.

Explanation of Ranks

***A1 or *A2**: Species in Alameda and Contra Costa counties listed as rare, threatened or endangered statewide by federal or state agencies or by the state level of CNPS.

A1x: Species previously known from Alameda or Contra Costa Counties, but now presumed extirpated here.

A1: Species currently known from 2 or less regions in Alameda and Contra Costa Counties.

A2: Species currently known from 3 to 5 regions in the two counties, or, if more, meeting other important criteria such as small populations, stressed or declining populations, small geographical range, limited or threatened habitat, etc.

A1?: Species with taxonomic or distribution problems that make it unclear if they actually occur here.

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APPENDIX B: Green Paper on Fuels Management in the East Bay Hills

Managing the East Bay Hills Wildland/Urban Interface to
Preserve Native Habitat and Reduce the Risk of Catastrophic Fire

An Environmental Green Paper- March 27, 2009

Sierra Club, California Native Plant Society, Golden Gate Audubon Society

This paper has been prepared by the San Francisco Bay Chapter of the Sierra Club (Sierra Club), East Bay Chapter of the California Native Plant Society (CNPS) and the Golden Gate Audubon Society (Audubon) to document our point of view about how best to meet the twin goals of managing the urban wildland interface to enhance and preserve habitat for native plants and wildlife species while reducing the threat of catastrophic fire at the interface.

This topic is of timely importance because of the pending release of the environmental review documents being prepared by the East Bay Regional Park District, FEMA grants for vegetation management, and other agency documents that are to follow. This paper contains the major guiding principles, which are further elaborated on in the attached background paper and appendix.

It is important to note at the outset that we embrace an Integrated Fire Management (IFM) approach to this issue. An IFM approach addresses the total scope of fire hazard both from problems with the human infrastructure and those from wildland vegetation.

We apply this theme at both the landscape level as well as at individual sites, whether they are homes at the interface or public parks and open space. While the human infrastructure including roads, water supply, defensible neighborhoods, etc., is expensive to maintain or improve, only well-planned infrastructure can assure safety from catastrophic fire. Without that fundamental understanding, vegetation management projects are doomed to fail in meeting the twin goals of fire safety and conservation of native habitat.

GUIDING PRINCIPLES

Background

We recognize that there is a frightening wildfire potential each fall for some residents living in the East Bay Hills. This potential exists because of the combination of extreme weather events (Diablo winds), the pattern of residential development in the hills, the proximity of flammable homes to fire-prone vegetation, and the lack of adequate preparation to the urban infrastructure, including defensible space.

Natural wildfire in wildland areas can be viewed as an event without serious consequences to humans, but at the wildland/urban interface where man has altered natural conditions, it can lead to a disaster. There are natural cycles that are unavoidable that we must pay attention to, prepare for, and be ready to respond to appropriately and sometimes quickly. As an example, during the 21st century the East Bay Hills will not be lucky enough, even with exceptional fire fighting, to get by with zero uncontrollable wildfires and zero extremes in weather. Diablo winds in the fall months are the key environmental factor for extreme fire behavior, and it will be impossible to know the exact location, source, and timing of an ignition that will transform high winds into a raging wildfire.

During some Diablo Wind wildfires there will not be enough firefighters, fire trucks, helicopters, or aircraft to save every house or even control the fire until the winds slow. Unlike "normal" fires that can be fought, to a certain extent on the ground, Diablo Wind fires prevent the placement of firefighters on steep slopes or other hazardous locations due to the speed of wind-driven fire. Under these circumstances, quick evacuation and homeowners insurance will be the only protection for residents who have lost property.

Recent reports compiled by firefighters and researchers in "lessons learned" from other catastrophic wildland/urban interface fires in California have shown that the most important factor in preventing homes from burning in wildland fires is hardening of structures and the creation of defensible space. Conversely, unprepared residential areas will likely not be saved during a wind-driven wildfire and will contribute to the rapid spread of wildfire into adjacent residential areas as happened during the 1991 Oakland/Berkeley Tunnel Fire.

The 1995 Hills Emergency Forum Plan did not receive full acceptance from the environmental community because it contained insufficient field collected data to support the designations of fuel characteristics of our local vegetation, did not take into account the importance of conserving native habitat, and did not include a legally required environmental document along with the Plan.

The 1995 HEF Plan recommended that public agencies and large acreage landowners create and maintain two different types of areas managed for fuel reduction in the East Bay Hills. The first are the ridgetop fuelbreaks that were begun after the freeze of 1972 by removing freeze damaged eucalyptus to achieve a 300' wide zone of managed vegetation where firefighters could attempt to stop a fire that started in wildland areas to the east, before it could race over the ridge into residential areas. The second type of management was created after the 1982 Blue Ribbon Report and the 1995 HEF Plan. The 1982 Report recommended fuelbreaks designed to provide a minimum of 100 feet of managed vegetation (including what the homeowner is required to do for defensible space) at the wildland/urban edge. The 1995 HEF Plan recommended fuelbreaks within a 500 foot study area, that in itself became controversial and confusing, designed to provide an area of managed vegetation with less than eight-foot flame lengths at the wildland/urban edge where firefighters could safely work to protect homes.

The Sierra Club, CNPS, and Audubon have not been satisfied with the Park District's approach for maintaining its fuel-managed areas. We know that fuelbreaks constitute a combined area of more than 20 miles and 500 acres, often covered by weedy species, mowed below 4" of height, or over-grazed by goats, with little concern about species or habitat values. Also several eucalyptus management, thinning, or conversion projects exist that need attention. We are concerned that the Park District's consultants and its staff have yet to articulate a clear vision about how they intend to maintain these areas while favoring and increasing the percentage of native plants over weedy, fuel-rich non-natives.

The debate about wildfire risks attributed to non-native eucalyptus trees has been a controversial topic for years. In our opinion, there is ample evidence to show that eucalyptus and pine trees in dense unmanaged groves are both a wildfire threat and an environmental dilemma that requires attention. Non-native eucalyptus and pine groves can exceed 120' in height and can be prone to dramatic fire behavior. When wind- driven wildfire reaches tree crowns, flames above 150' can be expected with burning embers blowing downwind well beyond one half mile. The capacity to spot new fires that overwhelm firefighting forces during Diablo Wind conditions means these species must receive high priority for treatment.

Selected and representative quotes, articles, and reports that provide additional information and perspective about the fire hazards and the environmental dilemmas posed by eucalyptus and pine plantations in the East Bay Hills can be found in the Background to the Environmental Green Paper.

Recommendations and Solutions

In our opinion, decisions about how best to manage our east bay hill vegetation on the wildland side should be based on the twin goals of reducing the risk of catastrophic fire and maintaining the fragile native habitat found in the wildland/urban interface. To accomplish these goals, agencies should formulate well-conceived plans that integrate natural resource sciences and fire science.

All plans to reduce vegetation on the wildland side must be site specific, taking into account a range of critical variables that result in an individual profile for each site. We do not endorse generic fuel prescriptions because they do not take into account the unique threats and values of each site. In order to accomplish the twin goals of reducing the risk of catastrophic fires and of maintaining sustainable native habitat, agencies must recognize that effective management of live fuels is a subset of sound land management (and not the other way around) primarily because of the high degree of variability of living landscapes.

We urge the Hills Emergency Forum (HEF) and its member agencies to prepare updated mapping systems for the East Bay hills that identify wildland plant communities in site-specific detail as well as the type and density of vegetation intermixed with home landscapes.

Native vegetation communities, including our native woodlands, are generally below 40' in height, and are less prone to unmanageable fire behavior. These communities are comprised predominantly of plants that are native to the East Bay and form more than 80% of today's wildland vegetation in the hills. The recommended strategy for protecting residential areas from wildfire coming from native vegetation is to establish an understanding of the ecology and fire-behavior of the fuels site-specific to each individual wildland/residential edge, and then manage these edges to provide safe access for firefighters defending structures that are able to resist burning embers and to hopefully stop fire before it enters residential areas.

As each agency prepares their individual plans and environmental documents, they will be required to address the cumulative impacts of wildland fire hazard reduction projects by all agencies. This will require active cooperation and long range planning by HEF member agencies. We will reserve our final opinion about how each agency handles these matters as we review their plans and environmental documents.

EBCNPS Conservation Committee

Enhancing and Preserving our Natural Environment
While Reducing the Risk of Catastrophic Fire
Background to the Environmental Green Paper

This Background Paper has been prepared by the Sierra Club (Sierra Club), East Bay Chapter of the California Native Plant Society (CNPS) and the Golden Gate Audubon Society (Audubon) to document our positions on several of the issues that are important to us as we explore options for meeting the twin goals of enhancing and preserving native plants and wildlife while reducing the threat of catastrophic fire at the Wildland Urban Interface in the East Bay Hills.

This topic is of timely importance because of the pending release of the environmental review documents being prepared by the East Bay Regional Park District, FEMA grants for vegetation management, and other agency documents that are to follow.

We would have preferred working with and commenting on a single draft wildfire hazard reduction plan and environmental document for the East Bay Hills with a free exchange of ideas, concepts, and details presented to and discussed with experts and stakeholders who have been involved in these matters for the past 15-years. This would have provided for an Integrated Fire Management approach at all levels, both in content and process, and among all-important stakeholders. This was the type of process that we expected after the Park District's Temescal workshops of 2000, and is consistent with our understanding of how the Park District Plan/EIR/EIS should have been developed. With that understanding, we supported Measure CC in 2004 including the $10 million for District projects and a joint fire hazard mitigation plan that was to involve Hills Emergency Forum (HEF) agencies.

Thus, we were disappointed that the HEF decided three years ago that each agency should proceed with individual plans and environmental documents. The East Bay Municipal Utility District and the University of California had already completed their Land Use Master Plans, with Berkeley, Kensington, and El Cerrito not contemplating plans for their residential areas. The next to emerge will be the Park District's Plan/EIR that has been under development during the past two years. The consultant's draft Plan is currently being reviewed by Park District staff that will recommend several changes in the draft, followed by a public review document that is nearing completion. We also understand that Oakland intends to prepare its plan and environmental document following completion of the Park District Plan/EIR.

In our opinion, staff and consultants have developed the Draft Park District Plan in relative isolation instead of taking more time to "get specific" with recognized experts and stakeholders. True, there were four informational meetings at the Trudeau Center with consultant and staff presentations, and time for public comment. However, the District's Plan/EIR process to date, has offered little detail, so it's anyone's guess about what will be in the draft documents soon to be released for public review. We have seen very little in the way of detailed resource information, and have not been informed about which federal agency the District will use to obtain required biological opinions necessary to make its Plan/EIR complete. In the event the draft, which we have not seen, requires substantial changes or additions, we support the use of additional Measure CC funds, District funds, or use of grant funds to complete a Plan/EIR document that will be useful and supported by the environmental community and other stakeholders.

In the meantime, the District has proceeded with fuels management based on very little oversight by its own stewardship department and with a FEMA EA that covered only federally listed plant and animal species. The result has been fuels management executed without the benefit of clearly derived policy.

Meanwhile the actual vegetation management projects taking place in some areas have been fraught with controversy. We also are aware that three Federal Emergency Management Agency (FEMA) competitive grants have been awarded to the University (Strawberry and Claremont Canyons), to the City of Oakland (Frowning Ridge), and to the Park District (East Bay Hills Area) for fire hazard reduction projects. These grants will require three different project level FEMA Environmental Assessments. As with EBRPD, one of the consequences of this kind of haphazard approach has been the creation of de facto policy on the part of UC, the City of Oakland, and various stewardship groups in terms of on-the-ground management of vegetation. These policies have not had the benefit of public, scientific vetting and in some cases have now found their way into federal policy. Without proper vetting, these activities have resulted in mixed results.

It is important to note at the outset that an Integrated Fire Management approach means that the total scope of fire hazard (both from human infrastructure and from vegetation) will be considered as a first step, both in the wide scope of the East Bay Hills Wildland Urban Interface and in individual sites that are identified for some form of action. While vegetation management is surely an important part of the total picture, it must not be the tail that wags the dog as it has been in the past, particularly after the '91 fire. While the human infrastructure including roads, water supply, defensible neighborhoods, etc., is expensive to maintain or improve, only well-planned infrastructure can assure safety from catastrophic fire. The National Firewise Communities program has made that clear. By its very nature, the living landscape involves far more variability and therefore attempting to manage it means a certain lack of predictability. Without that fundamental understanding, vegetation management projects are doomed to fail in meeting the twin goals of fire safety and conservation of native habitat.

It is clear to us that the approach taken by HEF agencies will result in duplication of effort as well as an understandable level of confusion as agencies work through fire hazard and resource management plans that address their unique situations. However, in the spirit of moving forward, we offer the following guiding principles for consideration by agencies and others interested in these issues.

GUIDING PRINCIPLES

1. **We recognize that there is a frightening wildfire potential each fall for some residents living in the East Bay Hills.** Our local wildfire history suggests that there are different levels of risk faced by hill residents depending on their location. Of the approximately 30,000 homes in the hills, the actual number of homes that have been lost or families personally threatened by a wildfire has been relatively small. However, agencies and residents should not be apathetic because wildland/urban interface wildfires are becoming all to common during the past two decades, and global warming with its extremes of weather will make this century even more risky.

a) Too many homes were lost during the Berkeley Fire of 1923, the Fish Ranch Road Fire of 1970, and the Oakland/Berkeley Tunnel Fire of 1991. These three Diablo Wind Fires destroyed homes, took lives, and caused substantial property and economic damage, and played a role in massive weed invasion of East Bay Hill native habitat. Seven other Diablo Wind Fires and many West Wind Fires have also occurred in the past along the 30-mile hill corridor without significant property loss, many before residential developments were fully extended into the hills. The above three Diablo Wind mega-fires destroyed a total of 3,600 homes during less than seven hours of rapid expansion for each fire. Wind driven fires can be impossible to control at the fire head, leaving firefighters to only work on a fires flanks until the winds slow. The 1991 fire destroyed 700 homes in one hour, a total of 3,000 homes in seven hours, and 26 lives were lost, mostly during the first hour of the fire.

b) Predictions about what might happen in the way of wildfire, weather extremes, and climate change during the 21st century should be part of the public discussions leading to agency planning processes that will ensure appropriate preparation for wildfire and appropriate planning for wise management of natural resources. As an example, during this century the East Bay Hills will not be lucky enough to get by with zero mega-fires and zero extremes in weather. Diablo Winds in the fall months are the key environmental factor, and it will be impossible to know the exact location and timing of an ignition that will transform high winds into a frightening wildfire. The events of the 20th Century suggest that it would not be unreasonable to forecast something like three Diablo Wind mega-fires, seven "normal" Diablo Wind fires, possibly as many as 150 "normal" West Wind fires, four El Nino events, four extended freezes, and four drought cycles that will all impact wildland vegetation and residential areas during the 21st century. Agency and homeowner preparation or lack of preparation will be directly related to the amount and extent of damage that these events can cause.

2. **Natural wildfire in wildland areas can be viewed as an event without serious consequences to humans, but at the wildland/urban interface where man has altered natural conditions, it can lead to a disaster.** When wildfire is in control, all involved vegetation and residential areas that lie in its path can be taken back to an earlier stage, to start all over again. Wildfires are different in scope and impact than controlled burns, but their potential for weed invasion can be the same. Given the level of weed invasion that is directly related to disturbance--whether it's fire or vegetation removal--, it is unlikely that native vegetation will re-set to "an earlier stage." Rather, we are likely to see an increase in weed invasion and a disruption of our East Bay Hill native habitat unless appropriate steps are taken to control invasive weeds.

   In the hills, wind driven wildfire will not distinguish between vegetation and unprepared residential structures. Virtually all development in the East Bay Hills occurred during a 100-year period when agencies and homeowners did not understand or respect the potential wildfire danger created by Diablo Winds. The patterns of residential development combined with the hills unique natural features have increased the potential for home loss during wind driven wildfire.

   a) Roads are on steep hillsides, narrow, and usually congested.

b) Homes are in dense residential areas, mostly constructed of wood, and often surrounded by other potentially flammable homes and vegetation.

c) Homes are on steep hillsides with limited access for fire fighters.

d) Public agencies and large acreage landowners have allowed non-native vegetation to develop "unnaturally" with little maintenance, and with increasing levels of flammability.

e) Above ground power lines are common in the hills and water supply for firefighting is less than desirable.

These are all recognized aspects of unsophisticated residential development in the hills, in comparison with today's standards. Public officials and fire safety activists, all to often, want to focus on fixing the "vegetation problem" without fixing the "residential problem". Both need short and long term attention and fixing.

3. **During some Diablo Wind wildfires there will not be enough firefighters, fire trucks, helicopters, or aircraft to save every house or even control the fire until the winds slow. Unlike "normal" fires that can be fought, to a certain extent on the ground, Diablo Wind fires prevent the placement of firefighters on steep slopes or other hazardous locations due to the speed of wind-driven fire.** Under these circumstances, quick evacuation and homeowners insurance will be the only protection for residents who have lost property.

   a) We believe that cities and area fire departments must develop more reliable fire-fighting strategies for combating Diablo Wind wildfire with more attention paid to identifying and expanding predetermined areas in both wildland and residential areas where wildfire might be stopped.

   b) Cities through their police departments must develop neighborhood evacuation plans, known to all residents and agencies, that recognize the potential for rapid spread of wildfire moving through hill residential areas with narrow and congested streets.

   c) Insurance is also necessary and critical for homeowners choosing to live in high-risk settings; however, having insurance should not be a reason for not appreciating and preparing for the actual risks being faced.

It is surprising to hear some resident's say they like the hills and their homes just the way they are, and that they accept the risk of wildfires. This sentiment is not usually shared by most, but remains one of the more important concerns if it threatens future stability of fire hazard reduction efforts. If true and persuasive, further efforts in wildland vegetation management may not be supported during tough economic times, and less substantial efforts will result in marginal wildfire risk reduction benefit. If the status quo condition for the hills were followed, future fire losses for both large and small wildfires would be a matter for insurance coverage if it can be obtained.

Fortunately, residents have recently voted to support two significant measures that will improve their fire safety. Oakland's Wildfire Prevention District and the Park District's Measure CC have provided funding to address fire risks by two of the largest landowning public agencies in the hills. **During these funding measures, the Sierra Club, CNPS and Audubon have supported strategic vegetation management programs in our neighborhoods, regional, and local parklands that reduce wildfire risks while conserving, recovering, and sustaining native habitats.**

4. **Recent reports compiled by firefighters and researchers in "lessons learned" from other catastrophic wildland/urban interface fires in California have shown that the most important factor in preventing homes from burning in wildland fires is hardening of structures and the creation of defensible space. We concur that the best way to protect homes from wildfire is for cities to make sure that all homes and all structures have 100' of defensible space, and that homes can resist burning embers. We strongly encourage and support programs by agencies and homeowners on local and private lands that will protect homes from wildfire.** The recently revised State Standards for defensible space and home construction can be relatively easy to inspect and achieve in rural areas, but not so easy in our densely occupied hill residential areas. Cities should determine how best to apply these standards for both individual homes and groups of homes, especially at the wildland/urban interface where property ownership is complex.

   Too often, homes are permitted and constructed within 15' or less of the property line without enough space to comply with the intent of state law that homeowners should create and maintain their own defensible space. Cities must continue to ramp up their inspections to get compliance and continue their inspections even in times of economic difficulty.

   Further, building codes must be updated to cover the construction and maintenance of fire safe structures that can resist burning embers. Waiting 50 years for remodels to bring new codes into force is unacceptable. Unprepared residential areas will likely not be saved during a wind-driven wildfire, and will contribute to the rapid spread of wildfire into adjacent residential areas.

   As a very important matter of public policy, cities and counties should make sure that homes and other structures are not built within an indefensible distance from public-park and open space without appropriate mitigation, nor from the open space borders of other public lands. Cities should also prioritize for inspection and compliance those structures already located within an indefensible distance from public parklands. Public agencies should not have to use their limited funds and staff resources to create and maintain defensible space for new homes constructed too close to park boundaries or other public lands.

5. **In our opinion, decisions about how best to manage our east bay hill vegetation should be based on the twin goals of reducing the risk of catastrophic fire and maintaining the fragile native habitat found in the wildland/urban interface. To accomplish these goals agencies should formulate well-conceived plans that integrate natural resource sciences and fire science.** Very little of today's East Bay

Hill wildland vegetation is truly pristine because of the dramatic landscape changes that have occurred during the past 200 years. Returning to the vegetation of 1800 or 1900 is not realistic or even remotely possible with today's population of 2.5 million east bay residents and the extensive hill residential areas that were developed during the past 100 years.

Existing native plants and habitat are the result of the unique and complex history of plant species and habitat evolution in this geographical area. Most of today's East Bay Hill public land vegetation (by counting numbers of species represented in that vegetation) is composed of "truly native" species. However, most of the plant communities, in their current locations and size, are relatively young and will continue to change. As change occurs, we believe that today's natively-evolved local species and their tendencies to aggregate into recognized "native habitats" can persist very well if allowed and assisted by dedicated land managers. These persistent, recognized habitats will indeed not remain static, and will go through stages of succession, development and rebirth during the next 200 years.

We know that "exotic" vegetation in the hills has experienced four major freezes that have killed or damaged eucalyptus trees, and that many fires have killed pine trees. Since the spread of both blue-gum eucalyptus and Monterey pines is assisted by fire, the presence of these trees pose a growing threat. We also know that global warming will result in further extremes in weather that will make the 21st century even more risky. The best we can say at this point is that we do not really know how native-like wildland plant communities will respond in detail to future climate change. However, we prefer to limit the possibilities to changes brought about by our natively evolved regional flora, and to not intermix or include species of distant exotic origins that will complicate the process and remain as potential fire hazards.

6. **Any and all fuels management plans must be site specific, not simply vegetation and fire risk specific. In order to accomplish the twin goals of reducing the risk of catastrophic fires and of maintaining sustainable native habitat, agencies must recognize that effective management of live fuels is a subset of sound land management (and not the other way around) primarily because of the high degree of variability of living landscapes. Each site is unique and is constantly undergoing multiple processes of change and evolution. Agency plans must be based on sound environmental concepts and not just the developing science of wildfire behavior in wildland/urban interface settings.** This is the issue that caused us the most concern during the discussions following the 1995 HEF plan. We are not so sure about how much useful fire science there is that will really apply to our unique wildland/urban setting since to date very little science has been based on field collected data. Instead, there has been heavy reliance on modeling which is subject to error based on sometimes-incorrect assumptions.

   We suspect that the Plan will be based on a combination of relevant local and statewide experiences with wildland/urban fire, and with some adapted fire science. However, we doubt that it will take into account detailed field-collected data on the unique characteristics of our local vegetation types. The application of sound environmental concepts will be especially important for any vegetation management program

undertaken by the Regional Park District where informed knowledge about the environment must guide what it can and should do to reduce fire risks.

Since 1995 we have consistently urged the Park District to seek solutions that will be effective with minimum impacts on the park environment in managed areas that are designed to sustain native habitat. We have also urged that a comprehensive Resource Management and Fire Hazard Reduction Plan be prepared, along with its legally required environmental document.

7. **We urge the HEF and its member agencies to prepare updated mapping systems for the East Bay hills that identifies wildland plant communities as well as the type and density of vegetation intermixed with home landscapes.** Since vegetation is a key factor in wildfire behavior, we should have accurate information about the type of vegetation that exists in both wildland and residential areas. We do not currently have a good mapping system with data on the fire-prone vegetation that is intermixed with home landscapes. If we are expected to reduce the risks associated with wildland vegetation, we should definitely be reducing the risks of vegetation to be found in residential areas.

   The 1995 HEF Plan is the only mapping system (other than the Park District vegetation maps of 2006 that only cover Regional Parks) available today that attempted to describe the type of wildland vegetation found throughout the 18,500 acres of undeveloped property in the Oakland/Berkeley hills (the 1995 acreage numbers do not include wildland vegetation in Kensington to Richmond residential areas or Wildcat Canyon Regional Park). The Behave computer wildfire modeling of the 18,500 acres of wildland vegetation predicted that 43% would burn with flame lengths of 8' or less that could theoretically be fought and controlled by firefighters on the ground. The other 57% of wildland vegetation would burn with flame lengths between 9' and 60', with fire fighters unable to control wind driven wildfires in these areas until the winds abate. Polygons were developed for each plant community, and the summary acreage of each type of plant community is organized in this paper as follows:

Acres	Native-like Plant Communities (mostly natives by species count)
4,100	Oak/Bay Forest- Mixed
3,847	Grassland (mostly areas that are grazed)
3,309	Dry North Coastal Shrubland
1,418	Redwood Forest
918	Successional Shrubland
855	Oak/Bay Woodland- Mixed
332	Wet North Coastal Shrubland
79	Chaparral- Mixed
71	Riparian Forest
10	Oak Savannah
14,940	Subtotal (81% of wildland vegetation)

Acres	Non-Native Plant Communities (dominated by trees with few species)
1,379	Eucalyptus- 20-year old stump sprouts (now 30-years old)
859	Pine Forest- Mature
836	Eucalyptus Woodland- Mature

233	Pine/Eucalyptus Mature, Mix
222	Eucalyptus- 5-year old seedlings (now 15-years old)
47	Pine Forest- Plantation
6	Acacia
6	Cypress
1	Other
3,590	Subtotal (19% of wildland vegetation)

This initial attempt to map and classify vegetation in the East Bay Hills has proved to be inadequate for the task because it did not accurately describe our diverse local vegetation types in site-specific detail, as well as for their individual and community fuel characteristics. There are newer mapping and classification protocols developed by the State Vegetation Program of the California Native Plant Society and adopted by the National Park Service and other government agencies that can be utilized to map and describe the vegetation in these areas accurately.

However, this is only one of several important factors to be taken into account when developing a management strategy for any given polygon. Location within a watershed, slope, aspect, wind mapping (under "normal" and Diablo conditions), live fuel moisture field sampling, description of understory (not only of woodlands but of shrublands as well), soil type, soil moisture, utilization by wildlife, type and degree of weed invasion, and proximity to structures. These are the important factors that go into understanding how best to manage a given area.

We are aware that the Park District's mapping project for Hill parks between Lake Chabot and Wildcat Canyon (and all Measure CC Parks) was finished in 2006, and that fire modeling has been completed for these parks. We will be particularly interested in reviewing the data, mapping results, assumptions used, and the fire attributes for park vegetation. We understand that the District's 13,818 acres of hill park vegetation have been grouped into the following park plant communities, and we have organized these groups into two major classes as follows:

Acres	Native-like Plant Communities (mostly natives by species count)
3,675	Oak/Bay Woodland
2,439	Woodland Succession
1,688	Grassland (mostly areas that are grazed)
1,505	Shrubland
1,022	Shrub Succession
474	Redwood
110	Willow
30	Riparian/Wetland
11,034	Subtotal (80% of park vegetation)

Acres	Non-Native Plant Communities (dominated by trees with few species)
1,862	Eucalyptus
363	Developed Park Areas and Turf
341	Pine
30	Mowed Annual Grass
5	Acacia

2,784 Subtotal (20% of park vegetation)

It appears that the fuels management done by the HEF agencies and EBRPD to date has been conducted in accordance with the old Behave (flammap) fuel models that are untested at the wildland/urban interface. If so, it has driven management decisions in ways that cannot support the goals of either achieving safer fuel loads or maintaining native habitat. If the old classification of maintaining an 8-foot flame length in all vegetation is adhered to, very little but mowed or grazed annual grassland can qualify as "safe" to maintain. The empirical result of following that prescription has often meant that the type conversion of native shrublands, such as Baccharis-dominated north coastal scrub, has created their replacement with fuel-rich French broom and light flashy fuels such as thistle, which also have poor habitat value.

On the other hand, field-collected data, including sampling for live fuel moisture, might indicate that, in some instances it's wiser to leave vegetation in place rather than to remove it. One example would be to contemplate leaving Baccharis, which contains relatively high levels of moisture, in some sites where it acts as a green sponge, holding moisture within the plant as well as within the soil.

It is critical that if fuel modeling is to be used, it contain accurate inputs from our local vegetation under differing conditions. We do not know what the current models are that are being used to inform the conclusions of the EIR or what information is being used as input to the models.

8. **The 1995 HEF Plan did not receive full acceptance from the environmental community because it contained insufficient field collected data to support the designations of fuel characteristics of our local vegetation, did not take into account the importance of conserving native habitat, and did not include an environmental impact report as required by state law.** However, the 1995 HEF Plan identified the specific wildfire threats faced by homeowners in the hills, and recommended a mitigation program for agencies and private property owners based on the following concepts.

   a) The Plan recommended that homeowners fully comply with state law that currently requires a minimum of 100 feet of defensible space surrounding structures, and that all homes in high risk areas should be constructed or renovated and maintained to resist burning embers.

   b) The Plan recommended that public agencies continue maintenance of ridgetop fuelbreaks, and create a new type of managed area at the residential edge, that will involve both public and private lands. The width for residential edge buffer zones has been a topic of ongoing controversy for the past 15 years. Currently, most research suggest that a maintained zone of vegetation 100' to 200' from structures (including homeowner defensible space) is appropriate, depending on slope, type of vegetation, and site conditions. These maintained areas will not necessarily stop all wildfires, but will be essential for providing safe locations for firefighters defending homes at the wildland/urban interface.

c) The Plan recommended that public agencies and large acreage land owners manage or convert their eucalyptus and pine groves to reduce the chance of burning embers being blown into residential areas.

9. **The 1995 HEF Plan recommended that public agencies and large acreage landowners create and maintain two different types of areas managed for fuel reduction in the East Bay Hills.** The first are the ridgetop fuelbreaks that were begun after the freeze of 1972. These fuelbreaks were created along the west boundary of regional parks with some sections along Skyline and Grizzly Peak Boulevards on city or other agency lands. Ridgetop fuelbreaks were created by removing freeze damaged eucalyptus to achieve a 300' wide zone of managed vegetation where firefighters could attempt to stop a fire that started in wildland areas to the east, before it could race over the ridge into residential areas. Public agencies that currently manage ridgetop breaks are now creating even wider resource management areas that are intended to look "natural on the ridge" without strict adherence to width criteria, usually with a roadway as the primary anchor line.

   The second type of management was created after the 1982 Blue Ribbon Report and the 1995 HEF Plan. The 1982 Report recommended fuelbreaks designed to provide a minimum of 100 feet of managed vegetation (including what the homeowner is required to do for defensible space) at the wildland/urban edge. The 1995 HEF Plan recommended fuelbreaks within a 500 foot study area, that in itself became controversial and confusing, designed to provide an area of managed vegetation with less than eight-foot flame lengths at the wildland/urban edge where firefighters could safely work to protect homes.

   While there is no mystery about the reason for reducing live fuels when residential areas are located at the edge of large public parks or other areas of dense natural-like vegetation, there is as yet no clear understanding of what management should be on specific sites since prescriptions have been generic or non-existing. Nonetheless, most park agencies are using some form of vegetation management on public lands at their residential edge to reduce the chance of wildfire moving from public lands into residential areas.

10. **The Sierra Club, CNPS, and Audubon have not been satisfied with the Park District's approach for maintaining its fuel-managed areas. We know that fuelbreaks constitute a combined area of more than 20 miles and 500 acres, often covered by weedy species, mowed below 4" of height, or over-grazed by goats. Also several eucalyptus management, thinning, or conversion projects exist that need attention.** We are concerned that the Park District's consultants and its staff have yet to articulate a clear vision about how they intend to maintain this interface while favoring and increasing the percentage of native plants over weedy, fuel-rich non-natives. This topic will be a subject for further comment and focus by our members and experts during agency Plan/EIR processes.

    From the Park District's perspective, focusing vegetation management efforts in the immediate area adjacent to homes means that larger areas of native-like park vegetation can remain unaffected. Most of the required District fuelbreaks are already in place with missing sections to be identified in the Plan/EIR. However, because very little

attention has been paid to maintaining healthy native habitat, these sections will need to be reviewed for site-specific sustainable practices as part of the vegetation management plan.

a) New fuelbreaks recommended for park grassland areas are either currently grazed or are on sites where brush succession has yet to occur. Continued grazing or mowing should be sufficient to maintain relatively narrow areas of grassland as fuelbreaks. Maintenance to reduce exotics and to increase native flora that will be sustainable should be the prime objective, so close attention must be paid when using goats or personnel unfamiliar with both exotic and native vegetation.

b) Shrublands are another matter requiring intensive management of wider fuelbreak widths when shrub species are retained because of their potential flame heights and rate of spread. Prescriptions usually call for shrub "islands" with about 30% of shrub cover (with retained shrubs pruned at four feet in height and cleared of flammable wood debris), with 70% open areas that are usually mowed. An alternative option for existing shrubland areas is to convert to a narrower fuelbreak width of grassland with regular mowing in the spring and summer.

c) Oak/bay woodlands are a relatively fire-safe plant community, with periodic clearing of ladder fuels being the only maintenance near homes.

d) In areas of non-native vegetation, conversion to the adjacent native-like plant community can be the best solution with over seeding of local ecotypes of native grasses and associated flora when soils are disturbed or left bare during conversion.

e) However, many of the District's earlier fuelbreaks involved a more destructive conversion during logging of eucalyptus and pine groves in the 1970s, followed by 30-years of mowing or goat grazing resulting in weed problems and broom invasion. These areas will require a different approach to re-establish natives, and a maintenance program that will pay attention to the removal of weedy plants and to increase the overall percentage of natives.

11. **Non-native eucalyptus and pine groves can exceed 120' in height and can be prone to dramatic fire behavior. When wind drive wildfire reaches their crown, flames above 150' can be expected with burning embers blowing downwind well beyond one half mile. The capacity to spot new fires that overwhelm firefighting forces during Diablo Wind conditions means these species must receive high priority for treatment.** Non-native plant communities in the hills are today's remnants of the tree planting efforts of two Oakland businessmen who forested the hills for future residential development and for hardwood lumber production. Frank Havens and Borax Smith formed the Realty Syndicate in 1895 to sell lots and homes to new residents who would also buy tickets to ride their trains. They launched a massive tree-planting program to beautify their 13,000 acres of hill land, and a few years later Havens formed the Mahogany Eucalyptus and Land Company to plant gigantic plantations of blue gum eucalyptus on his privately owned water company lands to meet the state's growing demand for hardwood lumber. Both enterprises could not be repeated today, but have

created increasingly significant environmental impacts that residents and agencies must now address that will be increasingly expensive in the future.

We have used "non-native" as the appropriate term for describing Havens bluegum (and redgum) eucalyptus trees from the Island of Tasmania Australia, and for describing pines and cypress from the coastal regions of central California. It is not only the "appropriate term" to use, but it carries broadly significant meaning in terms of the impacts these non-native species created and continue to present to the locally-evolved native biodiversity. It is not sufficient to consider these several non-native species as isolated occupants of the land. They each have large contextual, negative impacts that must be factored into any equation regarding protection and preservation of native resources in areas of locally diminished open space acreage.

Non-native eucalyptus and pine are some of the most dense and flammable plant communities in the hills. Un-maintained eucalyptus groves can have 400 to 900 trees per acre with fuel ladders into the canopy and 30 to 100 tons of flammable fuel on the ground. Wind driven wildfire in these groves can be expected to produce flame lengths and ember throws that will quickly overcome firefighters and significantly reduce evacuation time for homeowners.

Unmaintained pine groves are also extremely flammable with deep needle duff on the ground and dense pine seedling growth within and around the grove. The presence of Monterey pines intermixed with native coastal scrub also provides a source of tinder that contributes to crown fires since the needle duff can be ignited by embers and can burn off the live fuel moistures of species like Baccharis.

The recommended strategy for eucalyptus and pine groves is to manage or remove trees and groves that are close to residential areas that could throw burning embers long distances (including over fuelbreaks, natural barriers, and manmade barriers) into residential areas.

12. **Native-like vegetation and our native woodlands are generally below 40' in height, and are less prone to unmanageable fire behavior. Native-like plant communities form 81% of today's wildland vegetation in the hills comprised of mostly plants that are truly native to the East Bay.** The recommended strategy for protecting residential areas from wildfire coming from native-like vegetation is to establish an understanding of the ecology and fire-behavior of the live fuels site-specific to each individual wildland/residential edge, and then manage these edges to provide safe access for firefighters defending structures to hopefully stop fire before it enters residential areas.

    Most areas offer a range of small to large acreage (sometimes in a mosaic and sometimes as a single type community) of grassland, shrubland, oak/bay woodland, or redwood forest. These plant communities are rather young, achieving their current location, size, and form as a result of both human impacts and plant succession over the past 200-years. Photos at the turn of the 20th century show the hills dominated by grasslands (many of which were maintained by cattle grazing) with smaller areas of shrubs, oaks, redwoods, and riparian vegetation.

Recent research involving the analysis of phytoliths concluded that the historic plant community for well over 1000 years was baccharis-dominated coastal scrub. Thus, the jury is still out in terms of extent and distribution of the true historical vegetation types.

The density and distribution of today's native-like plant communities in the hills are unique to the 20th century and provide excellent habitat for wildlife and other species that make up today's diverse ecosystems. At many locations there are also endemic animals, birds, or plants that have legal standing. These listed species require individual monitoring, protection, and careful management.

Each native-like plant community behaves differently in wind-driven fire. Grassland fires are flashy and move quickly, but are relatively controllable. However, they provide a faster means of ignition and spread of fire into other vegetation, particularly upslope. Shrubland fires can also move quickly and some shrubs can produce flame lengths above 30 feet and, once ignited, are more difficult to control. Unfortunately, there has been little research into the important factors that affect ignition in the unique and various East Bay Hill shrub communities and they are thus far poorly understood. Because of the lack of specific field-conducted studies that would help elucidate both the ecological and fuel-related behaviors of individual species and shrub communities, they have been collapsed into the generic category of "brush," assigned fuel characteristics from other more fire-prone species, and been targeted for aggressive fuels management. Fire in native woodlands produces lower flame lengths but can also crown and produce burning embers under extreme conditions.

13. **The debate about wildfire risks attributed to non-native eucalyptus trees has been a controversial topic for years. In our opinion, there is ample evidence to show that eucalyptus and pine trees, in dense unmanaged groves, are both a wildfire threat and an environmental dilemma that requires attention.** Individuals who love eucalyptus trees aggressively defend the tree, arguing that it has been naturalized to this area, it provides habitat for wildlife, and it is not an unusual fire threat. Narratives about both the threat and the environmental dilemma can be found in the statements, articles, papers and reports contained in Appendix A.

14. **We are most concerned with the process by which decisions will be made about the most flammable and potentially controversial plant communities in today's parklands. We don't endorse generic options but favor site-specific analysis that is grounded in the best possible science. In practice, that means that any one given eucalyptus or pine grove will be managed for its unique characteristics to achieve fire safety, conversion to native plant habitat, or made safe for public use.** However, the threat factor is now relatively clear and can't be denied.

15. **The subject of eucalyptus and pine grove management remains controversial among people of good will. In the interim, the Sierra Club, CNPS, and Audubon offer the following statements for consideration when reviewing agency plans and environmental documents.**

    a) Agencies and private landowners should focus their efforts on removing eucalyptus and pine groves on or near the high ridges and on leeward slopes

(West facing) above homes to allow these spaces to convert to native-like vegetation that is less prone to spectacular wildfire behavior.

b) Eucalyptus areas that were logged between 1972 and 1974 should be revisited to remove all 30-year old stump sprouts and seedlings that will not form good park woodlands, and to allow these areas to convert to native-like vegetation.

c) Groves that are thinned to retain mature eucalyptus trees should keep 30 to 50 trees per acre with shrubs removed and ground fuel maintained at less than two tons per acre. However, everyone should understand that single-age stands do not usually make good permanent park forests because the stand will eventually reach its natural stage of decline and become a hazard that should be removed. At that time conversion to native-like vegetation should take place.

d) When eucalyptus and pine trees are removed, the areas they occupy should be managed to convert without planting new trees and shrubs to a fire-safe native-like vegetation that blends with and expands adjacent plant communities. The type of replacement vegetation and any required maintenance depends on site conditions and the type of plant community desired.

When a healthy understory of oaks, bays, and associated trees are present under the eucalyptus or pine canopy, they should be saved during logging and allowed (without additional tree planting) to become the replacement tree canopy.

When an understory of native trees is not present (especially on ridge tops and dry slopes), grassland and shrubland plant communities should be allowed to re-establish and succeed by appropriately controlling broom, thistle, and other invasive, fuel-rich species. Native shrubland will sometimes reestablish after the eucalyptus canopy is gone if invasive weed species are held in check.

When there is sufficient native grass cover and/or seedbank in areas to allow for establishment of good quality grasslands, these can be carefully restored and managed by grazing or mowing to prevent re-succession of shrublands. However, in the absence of a native grass seedbank, weeds will dominate the resulting "grassland". In this case, re-succession by native shrubs can help restore quality habitat.

e) Thinning young eucalyptus woodlands of suckers and sprouts to create a temporary managed grove is less desirable and may be untrustworthy on our steep and windy hillsides when the goal should be to convert to native vegetation. Thinning eucalyptus and waiting 30-years for native plant establishment under the canopy will allow ladder fuels to become established, and repeated costly logging projects will double environmental impacts.

f) We support efforts to keep mature eucalyptus trees in groves that can be thinned and maintained as a mature tree canopy for existing and future recreational activities, or as a historic tree grove to be retained pursuant to a park's adopted Land Use Plan.

g) We will be particularly interested in the policies that guide when to thin and retain a grove, and when to achieve a conversion to native-like plant communities that are appropriate to the site. As an example, for a grove with 300 trees per acre, it might be short sighted to take out 250 trees per acre to keep a grove when conversion to native vegetation could achieve multiple goals. This would be especially true for areas in parks where native vegetation should the objective.

h) In all cases, logged eucalyptus stumps must be treated and killed to prevent sucker growth.

i) Control of weed species such as broom, euphorbia, and eucalyptus seedlings is essential during all maintenance and conversion projects.

j) Non-native trees (such as eucalyptus and pine) that are small but will become large and are not part of the designed park landscape should be removed at the earliest time possible to keep costs low, minimize resource damage, and allow native-like vegetation to develop as soon as possible.

k) Tree removals (logging) can be very controversial, and the immediate appearance of logged areas can be dramatic, triggering public protest from people who have not responded during the planning process but are motivated to speak out once logging begins. Often the public is unaware of the costs and tradeoffs of large-scale projects such as logging. As a result, tree-logging projects must be made to be very visible during the entire public process. Before logging projects are presented to the Board for approval to seek bids, staff should ensure that the tree project has specific Plan/EIR clearance with a notice posted in the park before the Board meeting and "left posted" until project completion. After the Board approves a contract, District managers and Board members must be ready to support the tree removal project through to the end. After the contract is awarded and the work begins (sometime months later), experience has shown there will always be a member of the public who sees what's happening, pleads to save trees, and will lobby to stop all work.

16. **As each of the East Bay Hills Emergency Forum agencies prepares their individual plans and environmental documents, they will be required to address the cumulative impacts of wildland fire hazard reduction projects by all agencies. This will require active cooperation and long range planning by HEF member agencies.** The HEF will need to provide sufficient coordination to make sure that potential cumulative impacts are clearly described, and that significant cumulative impacts can be avoided. We urge all agencies to consult with their legal advisors for guidance in developing plans that will address the cumulative impact issue. Of course, we will reserve our final opinion about how each agency handles these matters as we review their plans and environmental documents.

a) Agencies should commit that cumulative impacts will be avoided while converting high-risk eucalyptus and pine groves to native vegetation, and that they will consider their projects to be self-mitigating projects that complete the work begun in 1973/74. Most of the involved public agency acreage was logged after

the 1972 freeze. The removal of multiple stump sprouts and dense seedlings in already logged areas is ongoing work that needs to be completed. Sprouts and single age stands of seedlings are unsuitable for forming safe and healthy woodlands.

b) Agencies should commit that cumulative impacts will be addressed and avoided by their projects, when considered separately or together, and that they will involve relatively small acreage dispersed along a 30-mile long wildland corridor that totals more than 18,500 acres of similar vegetation

c) Agencies should commit that cumulative impacts will be avoided by their projects that are coordinated on lands separated by time and space from other agency projects. Coordination will be used to ensure that work will be scheduled over a reasonable period of time, and that there will be no cumulative impacts from overlapping work on the same or adjacent lands.

d) Agencies should commit that cumulative impacts will be avoided when their projects are coordinated to have sufficient distance between projects by others in location and time, and ensure that there will not be significant cumulative unmitigated impacts on common resources such as wildlife and keystone habitat.

e) Agencies should agree that they will not allow vegetation management projects to have a significant cumulative impact on sensitive species or habitat because of existing environmental regulations that will be followed, and because of the biological opinions and mitigations that will be required by state and federal resource agencies.

Appendix A

The following quotes, articles, and reports provide additional information and perspective about the fire hazards and the environmental dilemma posed by eucalyptus and pine plantations in the East Bay Hills.

a) In March of 1973, H.H. Biswell, Professor of Forestry and Conservation at the University of California, Berkeley made this prophetic statement. "When eucalyptus waste catches fire, an updraft is created and strong winds may blow flaming bark for a great distance. I think the eucalyptus is the worst tree anywhere as far as fire hazard is concerned. If some of that flaming bark should be blown on to shake roofs in the hills we might have a firestorm that would literally suck the roofs off the houses. People might be trapped".

b) James Roof, Director of the Tilden Botanic Garden, in his detailed paper of February 1973, made observations about the areas wildfire risks, about eucalyptus tree risks and impacts on native flora, and offered his recommendations following the freeze of 1972.

c) Professor Robert Stebbins, Professor of Zoology at UC Berkeley and the curator of the UC Museum of Vertebrate Zoology has been a long-time advocate for retaining eucalyptus groves because of the habitat they provide for local wildlife especially amphibians and birds, and prepared several papers on this subject during the 1995 HEF plan review period.

d) The Temescal EIR Advisory Group in 2000, listed the following guidelines for eucalyptus and pine forests: "Eucalyptus Forest – This introduced forest community is highly controversial because of the extreme fire behavior that it can generate and because a significant number of native species that have adapted to it. It is a high priority for management, particularly in areas where it has the potential for involvement in wildland fires. Management plans must also take into account impacts on those species that have adapted to Eucalyptus. A number of native raptor species including the Turkey Vulture, Red-tailed Hawk and Great Horned Owl seem to prefer Eucalyptus to native forests in a variety of circumstances. Nest and roost trees should be identified and accommodated with appropriate buffers, where feasible, in fuel-break planning. Monterey/Bishop Pine Forests – This transplanted California native plant community occurs in dense stands and as individual specimens in several areas within the study area. Although less widespread than Eucalyptus, these coniferous forest species are also preferentially used by native raptors including the Golden Eagle. As with Eucalyptus, nest and roost trees should be identified and accommodated with appropriate buffers, where feasible, in fuel break planning."

e) The Vegetative Management Plan for the Eucalyptus Freeze Affected Areas in the Berkeley-Oakland Hills was prepared to guide the efforts of agencies working to reduce the potential for wildfire after the freeze of 1972. The Plan was prepared after the hills were declared a disaster area by the State's Governor, and was adopted before the California Environmental Quality Act was amended to include public agencies.

f) The Ubiquitous Eucalyptus article, by Bill O'Brien in the fall 2005 BayNature magazine describes the history of eucalyptus trees in the East Bay as well as statements and opinions by local "experts" about both positive and negative aspects of eucalyptus trees.

g) Respect for the flammability of our hill's dense eucalyptus groves is common knowledge among local fire chiefs. Fire departments have not been willing to use prescribed fire (with prescriptions set for when fire control is theoretically possible) to reduce the flammability of groves by clearing the 50 to 100 tons of ground fuel that can be found under unmaintained eucalyptus groves. Fires in native-like vegetation will not burn well in the hills during most of the year, but fires under eucalyptus with its shredding bark and oily leaves can move to the treetops during almost any season. Professor Biswell tried unsuccessfully, in the 1970's to establish prescribed fire as a local maintenance practice in eucalyptus, as is done in Australia. Regional Park Fire Chiefs have wavered, and remain unwilling to use this technique even today because of the risk of escaped fire, and because of smoke impacts on the air basin.

h) The 1995 HEF Plan (in its final Report and Technical Appendices) determined that eucalyptus and pine trees and the burning embers that they can produce in a wind driven wildfire are an important factor in the wildfire risks faced by hill residents.

i) Javier Trelles, and Patrick J. Pagni UC Berkeley Professors analyzing the role of wind patterns during the 1991 fire, described the Sunday morning fire start as follows. On October 20, at 6:00 a.m., the normal weather pattern was interrupted as winds in excess on 10/ms arose from N 35 degrees E and the relative humidity dropped below 10%. This strong, dry convective current began to dramatically lower the moisture level of the previously soaked burn area of the Saturday fire. The ambient temperature climbed to 90 degrees. The few embers that remained buried overnight were by 10:45 a.m. spotting to new areas of dry fuel. Between 11:15 and 11:30 a.m., extremely rapid fire spread in windward direction overwhelmed fire crews called in to help. The initial brand material came primarily from Monterey pine, Pinus radiata. About 650 meters from the fire origin, the fire engaged a 35-meter high stand of Eucalyptus globules that quickly became an inferno releasing copious brands. Once structures became involved, the shakes and shingles they liberated further exacerbated the flaming brand problem.

j) The East Bay Hills Oakland-Berkeley Fire that was investigated by J. Gordon Outlay. His report was conducted under contract to the United States Fire Administration, Federal Emergency Management Agency. The following excerpts are taken from his report.

"Fire has been a part of the history of the Oakland-Berkeley Hills area throughout its history. As with many other marine climates, fuel moistures are such that during most periods, fires do not cause dramatic damage but rather help maintain a balance of fuel types and reduce fuel loads. The

native flora and fauna had adapted correspondingly with the natural occurrence of fire in the area."

"Additionally, the introduction of vegetative species which are not native to the area has dramatically impacted fuel loading. This is particularly true of the introduction of eucalyptus. Fuel accumulations in some areas under eucalyptus plantations have been estimated between 30 and 40 tons per acre. Monterey Pine was also introduced into the area and contributed significantly to the fuel loading."

"Additionally, eucalyptus is susceptible to freeze damage, as occurred in 1972, when large numbers of eucalyptus were killed due to an extended period of below freezing temperatures, and again in December of 1990. The dead trees and limbs added a significant amount of dry fuel in the area. Also, eucalyptus sprouts back from the stump and this sprouting after freezing or after logging operations has also increased fuels in some areas."

"Between 1986 and 1991 most of California experienced drought conditions. This situation was recognized as creating more and more critical fire risk conditions each year. The unprecedented drought was accompanied by an unusual period of freezing weather, in December of 1990, which killed massive quantities of the lighter brush and eucalyptus."

Appendix C

MEMORANDUM OF UNDERSTANDING
For Cooperative Vegetation and Habitat Mapping and Classification
June 1, 2000

MEMORANDUM OF UNDERSTANDING
For Cooperative Vegetation and Habitat Mapping and Classification

June 1, 2000

I. Preamble

In keeping with the policies and principles of the California Biodiversity Council, the signatories mutually agree by this Memorandum of Understanding (MOU) to establish a cooperative vegetation and habitat mapping initiative which will facilitate statewide joint data collection and processing, establish common mapping and classification standards across all ownership, and provide timely response to both State and Federal information and analytical requirements.

II. Background

Vegetation is among the most important characteristics of California's natural environment. Vegetation provides food and shelter for the State's terrestrial animal species, aids in the maintenance of aquatic habitats and is the larger community that supports our many unique plant species. Vegetation acts as a filter for the state's watershed lands, provides valuable forest products, economic benefits, and recreational opportunities to the citizens of California. High quality data are critical for the preservation, management and risk assessment of California's ecosystems and the vegetation upon which we all depend.

Agencies involved in this MOU have intermingled responsibilities and often produce vegetation, habitat maps and classification systems in their ongoing activities in different ways. Such maps help to pinpoint habitat and species likely to be affected in any given planning area by management decisions. They also provide critical information necessary to identify and prioritize vegetation and habitat conservation activities. Coordinating efforts across the state will improve the efficiency in the use of public funds to meet our shared responsibilities. This combined effort will improve access to data, provide greater consistency in how data are developed, and meet the on-the-ground needs of field staff. A statewide effort to facilitate more standardized mapping, and classification of vegetation and habitat will produce more compatible data across administrative boundaries.

III. Goals, Strategies and Objectives

The goals of this MOU are to establish and maintain statewide vegetation and habitat data layers of known accuracy in compliance with the National Vegetation Classification System (NVCS).

The strategies consist of collaboration with data sub committees, and others in the following areas:

- Sharing of and access to vegetation information and technical expertise.
- Identification and implementation of classification and mapping priorities, including accuracy assessments.
- Cost sharing and/or in-kind services to implement identified priorities.

Specific objectives include:

- Develop common standards for data content, data capture methods, field procedures, accuracy assessment and documentation.
- Complete a hierarchical vegetation classification system adaptable to varying goals of the signatories and improve vegetation and habitat classification and crosswalks between systems
- Complete and maintain a vegetation map of all public and private lands in California on a regional basis through interagency cooperative efforts as the basis for vegetation inventories and assessments of habitats, including detection of changes.

IV. Principles of Agreement

Agency staffs agree to participate in a Core Group to coordinate implementation of the goals and objectives of this MOU. Agency staffs also agree to communicate through periodic meetings of the Science Coordinating Committee for Vegetation.

V. Authority

This MOU does not modify or supersede existing statutory direction of the signatories.

VI. Modifications

This Memorandum is to remain in effect until modified by the parties in writing. It is negotiable at the option of any of the parties.

VII. Termination

Any party may terminate their participation in this MOU at any time when all parties are notified in writing.

VIII. Non-Binding Obligations

This MOU is a declaration of policy and represents the intent of the parties in principle only. It is not binding on the parties. In the event the parties to this MOU desire to formalize the principle intent of this MOU, they will enter into a fully integrated agreement at a later time.

IX. Completion Date

This MOU is effective for each participating agency upon signature date shown below.

MEMORANDUM OF UNDERSTANDING
For Cooperative Vegetation and Habitat Mapping and Classification

Mary D. Nichols — Date 9/12/00
Mary D. Nichols
Secretary for Resources
The Resources Agency

Andrea E. Tuttle — Date 7-19-00
Andrea E. Tuttle
Director
California Department of
Forestry and Fire Protection

Robert C. Hight — Date 8-17-00
Robert C. Hight
Director
California Department of
Fish and Game

for Bertha C. Gillam — Date 9/20/00
Brad Powell
Regional Forester
Pacific Southwest Region
USDA Forest Service

Lester A. Snow — Date 9-7-00
Lester A. Snow
Regional Director
Mid-Pacific Region
Bureau of Reclamation
U.S. Department of the Interior

Al Wright — Date 7/6/00
Al Wright
State Director
Bureau of Land Management
U.S. Department of the Interior

MEMORANDUM OF UNDERSTANDING
For Cooperative Vegetation and Habitat Mapping and Classification

Date 9/18/00

Rusty Areias
Director
Department of Parks and Recreation

Date 7/21/00

Daryl W. Young
Director
Department of Conservation

Date 9/19/00

Mike Spear
Manager
California/Nevada Operations
U.S. Fish and Wildlife Service

Date 2-5-01

W. R. (Reg) Gomes
Vice President -- Agriculture and Natural Resources
University of California

Date 31 October 2001

Susan Britting
President
California Native Plant Society

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JUN 17 2013
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Environmental Protection Information Center
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June 17, 2013

Allesandro Amaglio, Regional Environmental Officer
Region IX
Federal Emergency Management Agency
P.O. Box 72379
Oakland, CA 94612-8579
EBH-EIS-FEMA-RIX@fema.dhs.gov

Regarding: Hazardous Fire Risk Reduction Draft Environmental Impact Statement, East Bay Hills, California

Dear Mr Amaglio or Who it May Concern,

These comments are written on behalf of the membership of Californians for Alternatives to Toxics, aka CATs, and the Environmental Protection Information Center, aka EPIC. Many of CATs' members live, work, recreate, study and otherwise participate in activities in the communities of the East San Francisco Bay. CATs is a public interest organization with membership throughout northern California, including many who live in the East Bay communities. The members of CATs are concerned about the negative effects of toxic chemicals in the environment. CATs has a history of 35 and more years of opposition to harmful herbicide use in forestry operations, the issue that brought about the formation of CATs. Our members are concerned about the effects of the use of toxic chemicals, as described for the proposed and related projects, on the environment on which they are dependant for health, home, work, recreation and culture.

EPIC is a non-profit public interest organization formed to promote environmental values and environmental protection. While EPIC's office is located in Humboldt County, its membership is from throughout the State of California and beyond, including in the East Bay area. Members of EPIC live and enjoy and recreate in the East Bay Hills near the project areas. EPIC members live and or travel within the East Bay hills region for personal, aesthetic and recreational pursuits, including hiking, bird watching and enjoying this region's incredible natural beauty. EPIC members derive professional, scientific, aesthetic, spiritual, recreational, economic, and educational benefits and well-being from the project area and its resources.

Project Purpose and Need

We understand the purpose of the proposed project is to reduce wildfire hazard by removing certain vegetation and recruit native vegetation. While the EIS provides information as to the removal of vegetation, there is scant evidence as to how the agencies intend to recruit native vegetation. The EIS provides a general statement at outset advises that native vegetation will be preserved and encouraged to expand, but no details are provided. 1.1.1. While the EBRPD apparently intends to protect native vegetation, 3.4.2.3, there are no standards identified as to how that will happen.

The MMPs rely on "recruitment of native vegetation," yet provides no detail as to how that will happen. Hydroseeding is be used as erosion control method, "if severe erosion is occurring at a site," 5.3.2.4, but is not proposed to recruit or establish native vegetation. While the EIS states that seed sources of native grasses, shrubs and trees are regionally abundant and would be used "to assist in the recovery of the areas," 5.1.2.2.1, we did not find a requirement or information to detail how and when those sources would be used.

It is clear that the proposed activities will damage existing vegetation, including non-target species. 5.1.5.1. It is also clear that the understory of existing eucalyptus stands support native shrubs and plants. 4.2.2.2.2. This vegetation will be damaged, if not entirely eliminated, as consequence of project activities. Yet no articulated standards and protocols are in place to ensure recruitment of native vegetation.

As an example, UCB intends to cut nearly 50,000 trees, yet has no protocol for restoration of the three areas (Strawberry Canyon, Claremont, Frowning Ridge). Its project will take upwards of 2-3 years, with an estimate that "success" will occur within 7-10 years. But in the absence of any defined plan to actually plant and ensure growth of native vegetation, the "success" may simply be a denuded landscape with struggling native species. The project purpose and need is not justified in the absence of clearly enforceable and defined protocols to ensure native species protection and development. There is no long term effectiveness in the absence of a rigorous replanting program.

An additional concern about the project is the disclosure that Timber Harvesting Plan(s) (THPs) may be required by the California Department of Forestry and Fire Protection. That regulatory regime has extensive information requirements, many of which are not met through this EIS. Moreover, typically THPs are required for commercial operations, or where the landowner intends to do logging operations to advance a commercial operation. Hazard removal typically does not require a THP. In this instance, from what we read in the EIS, there is one commercial operation disclosed – UCB's plan to use the Claremont Canyon project area for development of faculty housing and a campus retreat center. 5.12.2.4. Given this disclosure those project elements should be fully disclosed and examined.

Alternatives

A core defect in the Hazardous Fire Risk Reduction Environmental Impact Statement , aka EIS , is its failure to consider a range of viable alternatives.
The very "heart" of a NEPA procedure is the range of alternatives. The FEMA EIS fails this central requirement. The Council of Environmental Quality (CEQ) makes it clear :

The phrase "range of alternatives" refers to the alternatives discussed in environmental documents. It includes all reasonable alternatives, which must be rigorously explored and objectively evaluated, as well as those other alternatives, which are eliminated from detailed study with a brief discussion of the reasons for eliminating them. Section 1502.14. [NEPA 40 Questions http://www.bing.com/search?q=CEQ+NEPA+40+Questions&FORM=QSRE6]

What's more, eliminating, ignoring or simply not exploring viable alternatives severely limits FEMA's ability to modify its funding conditions that might be required to secure a better alternative. The EIS here actually presents only one alternative that could be modified, as "no action" can't be modified. This in large part eliminates any possibility that a reasonable and viable alternative "would evolve through the EIS process." 3.3.

Because *[a] decisionmaker must not consider alternatives beyond the range of alternatives discussed in the relevant environmental documents. Section 1505.1(e). [NEPA 40 Questions],* the lead agency, in this case FEMA, must provide a range of alternatives or there can be no substantial changes made by the decisionmaker. The FEMA EIS as currently drafted limits FEMA's ability to undertake its obligation to present a range of alternatives, as FEMA is limited to merely adopting or deleting whole or parts of the one modifiable alternative as presented in the FEMA EIS. To be valid, based on the project, the FEMA EIS cannot stand on just two alternatives, with one being unmodifiable, as the "no action" alternative, and the other is simply inadequate. The EIS fails to comply with NEPA as it presents just one alternative that may be in parts eliminated or reduced but to which no new or different alternative can be added despite what FEMA may learn during the evolution of this EIS process.

The public, too, must know what significant alterations might become part of the Record of

Decision in advance of its publication. When the public is deprived of knowing what may be chosen as the final project description, the NEPA process has failed. The FEMA EIS cannot hold itself above the public by informing decisions for which the public has no opportunity to provide input at the end of the process.

Just how many alternatives need to be discussed is not set by the CEQ, but certainly more than two are necessary, especially for a complicated proposal with many significant environmental effects as are analyzed for the proposed and connected projects in the FEMA EIS.

When there are potentially a very large number of alternatives, only a reasonable number of examples, covering the full spectrum of alternatives, must be analyzed and compared in the EIS...What constitutes a reasonable range of alternatives depends on the nature of the proposal and the facts in each case. [Ibid]

We believe the facts support the development of several alternatives; examples of reasonable alternatives are described below but should not be limited to these examples or even those proposed by the public during scoping. Science and the development of information where it is currently limited should be a primary determining factor for the development of alternatives.

A significant failure in development of alternatives is that FEMA did not prepare an Integrated Vegetation Management, or IVM, alternative. Professors and researchers at UCB have a long history of developing Integrated Pest Management (IPM), of which IVM is a subset. Oakland and EBRPD have both adopted IPM programs. Another local jurisdiction, the City of Berkeley, has adopted IPM guidelines. Given that the proposed and connected projects are so wide in scope, an IPM alternative of greater scope than Oakland's, Berkeley's or EBRPD's should be developed.

A true combined alternative, as part of a "range of alternatives" would offer a less intensive and environmentally damaging alternative. The EIS at 3.3.1.4 rejects a "combined alternative program." by entirely rejecting actions, instead of requiring them as part of the overall project as a means to reduce use of herbicides and clearcutting.

It is clear from the EIS that the EBRPD uses, and has been successful in using, an integrated vegetation removal program that incorporates removal of underbrush, surface fuels, lower limbs and small trees, and restricts the use of herbicides. For example, the EIS discloses that the EBRPD will thin dense eucalyptus stands, favoring retention of large trees to create an open eucalyptus stand with minimal understory. 3.4.2.2.6. This is a viable alternative, which can and should be incorporated by all agencies. It is less damaging than UCB's intention to remove 50,000 trees.

A "combined alternative" of greater scope than the local IPM policies referenced in the FEMA EIS should be further developed as an Integrated Vegetation Management alternative

that would encompass some of the alternative proposals for maintenance eliminated from review. For example, regarding resprouts --for which applying herbicides is the solution provided in the one proposed action alternative – a combination of manual removal, covering stumps with plastic – both proven methods of preventing resprouting of targeted tree species – and other options not discussed in the FEMA EIS, including prescribed burning, the most effective alternative, could be instituted in parts if the proposed project was extended over a greater period of time and if funds were spent not to clearcut and eradicate but rather to reduce and gradually change species content. An IVM maintenance plan would embrace these rejected alternatives, none of which should be seen as a fully complete alternative but constitute components of a complete alternative, to be utilized in certain areas to reduce dependence on herbicides.

Another alternative, or another part of a more comprehensive, integrated alternative, would be to develop an Integrated Fire Management (IFM) alternative. For this proposal, other alternatives eliminated in the current FEMA EIS could become components of an integrated comprehensive plan. Firefighting agencies reduced in effectiveness due to budget shortfalls of recent years would be strengthened, not as a stand-alone alternative but to provide one component of an IFM alternative. FEMA could "lean on" local governments to demonstrate enforcement of residential clear and defensible space areas, as required by California law, to condition funding for fire hazard reduction by entities owning wildlands where vegetation may threaten residences of those communities. FEMA could fund infrastructure improvements such as water storage for firefighting in residential areas. Hardening of residences most vulnerable to wildfire could be provided directly or in low-cost loans. FEMA could fund undergrounding of utility lines in the most vulnerable areas. Developing integrated alternatives would provide viable alternatives to the "bare earth" strategies envisioned for large parts of the project areas and enable landowners to take a slower, more environmentally benign approach to converting the landscape, thus reducing environmental impacts such as the reliance on herbicides for a decade or more.

None of these components have been shown to be impossible or not viable by the FEMA EIS except if used as complete alternatives unto themselves. We concede this point but believe the FEMA EIS fails until integrated practices and other potentially viable, but perhaps not "preferred," alternatives are provided as part of "the range of alternatives" required by NEPA.

California Environmental Quality Act

Although FEMA has chosen to be lead agency, several agencies organized under the State of California are significantly more than cooperating agencies in the implementation of the FEMA EIS. For example, while the U.S. Forest Service is clearly a cooperating agency, the same is not entirely true of EBRPD, Oakland or UCB, each of which have written distinctly different plans and will implement them, thus making these actually lead agencies. With the burning component of EBRPD's program where carbon monoxide levels are expected to exceed California Air Resources Board thresholds and with the potential for Timber Harvest

Plans to be obtained from the California Department of Forestry/CalFire, a concurrent CEQA procedure in the form of an Environmental Impact Report must be undertaken.

California Environmental Quality Act (CEQA) requires coordination of federal and state environmental review documents. Here, there is no effort to combine an environmental impact report (EIR) with this EIS, thereby undermining CEQA's goals, as well as its more rigorous substantive requirements.

Project Impacts

Herbicides are not clearly nor adequately described or analyzed

The EIS must explain or summarize methodologies or research and modeling, and the results of research that may have been conducted to analyze impacts and alternatives. CEQ. 40 Questions

A plain language summary of the analysis and conclusions of that technical discussion should go in the text of the EIS. Ibid

The EIS fails to inform regarding the number of trees that will be treated with herbicides. For example, 12,000 eucalyptus, pine and acacia trees will be cut down in Strawberry Canyon and herbicide applied to all but the pine trees. 3.4.2.1.1

However, the EIS does not identify how many trees into which herbicides will be applied, the rate of application, or the gross amount per year of herbicide projected to be used in Strawberry Canyon and other sites. Not providing these critically important descriptions renders analysis of the impacts of herbicides a failure. If 10,000 of 12,000 trees are treated, and some are sprayed and others painted, depending on distance to waterways, it takes a wild guess to know how much herbicide will be introduced to the canyon watershed. Year two and on could involve significantly more herbicide as sprouts could reach 6 feet in height, requiring more herbicide application higher into the air, potentially increasing adverse impacts. The Garlon 4 label at http://www.cdms.net/LDat/ld0B0013.pdf, for example, directs that higher rates of Garlon 4 be applied later in the summer and fall season. The EIS fails to evaluate the impact of late season application on the level of use rates of Garlon 4. These gaps in the herbicide analysis render analysis unreliable.

Neither eucalyptus nor acacia are listed as susceptible species on the Garlon 4 label. What evidence is there that either species will be adequately susceptible to the chemical? What impact will susceptibility or lack of it have on total herbicide use and environmental impact?

Herbicides will be applied twice a year to control sprouts, but fails to disclose when those applications will occur, and what effects may be associated with that seasonal application.

Eucalyptus seedlings will be "managed." It is not clear if management will be with herbicides or other means, as this is not defined. Herbicides are to be applied by a licensed pesticide applicator, but it is unclear whether this means that each individual applying herbicide will be licensed or that they will be under the supervision of a licensed applicator, who may not be on site.

Herbicide active ingredients are mixed with other compounds in the formulation. Impacts of these mixtures is not adequately described or analyzed in the EIS.

Garlon 4's active ingredient is triclopyr and 38.4% other ingredients. 72.3 % of Stalker is "other ingredients." Up to 31% of Garlon 4 formulation is kerosene. What impact on fire risk might the addition of kerosene, combined with oil, have on increased fire risk? Which formulation of "Roundup" will be used? POWERMAX, PRO, ProDry, QuikPRO, Ultra Dry, Ultra Weathermax? The differences in these formulations will have differing environmental impacts. For Roundup Pro, "other ingredients" make up 59% of the formulation. Roundup PowerMAX "other ingredients" are 51.3 % of the formulation. The active ingredient of PowerMAX is a potassium salt of glyphosate. Roundup Ultra is an isopropalamine salt; various formulations may have varying environmental impact. For Roundup Ultra, "other ingredients" make up 59% of the formulation. These differences translate into varying environmental impacts which are not evaluated in the FEMA EIS. Nor does the EIS evaluate the impact that these varying "other ingredients" will have on the environment.
For example, Roundup formulations include polyethoxylated tallowamine (POEA), isopropylamine, and diethanolamide. Each of these compounds has been shown to exhibit toxicity at much higher levels than glyphosate alone. POEA has been shown to be three times as acutely toxic to humans as glyphosate alone.
http://www.thelancet.com/journals/lancet/article/PIIS0140-6736(88)90379-0/fulltext

One surfactant commonly used in Rodeo (similar to Roundup) was found to be 100 times more toxic to aquatic invertebrates than glyphosate alone.
http://www.ncbi.nlm.nih.gov/pubmed/3607312

Other inert ingredients have been shown to be genotoxic, carcinogenic, teratogenic and disruptive to reproductive function in both humans and animals.
http://www.ncbi.nlm.nih.gov/pubmed/12821000

These environmental variables are not adequately described in the EIS and may have significant impacts on the environment. This gap and others described in these comments render herbicide analysis inadequate for NEPA compliance.

While the EIS states that spraying of herbicides will be allowed with 60 feet of water, to stumps, but not foliage, it later indicates that spraying will occur on returning vegetation 3 to 6 feet in height, for up to 10 years. This means there will be spraying of foliage within 60 feet of water, as no other proposals are identified.

The rate of application of herbicides – within 60 minutes of the felling of each tree –

indicates an intensity of application that must be evaluated, particularly as to safety to workers as well as concentration of the herbicides used. And while no herbicides are to be "intentionally" applied to nontarget species, 5.4.4.2, there is little consideration of what to do in the event that nontarget species are exposed to herbicides.

A key failure is the lack of analysis of the toxicity of surfacants and adjuvants to be used in conjunction with the disclosed herbicides. While some mention is made in the Appendices F and L, there is no analysis provided, even though the EIS admits that surfactants can likely be more toxic than the herbicides themselves. 5.10.2.3.1. Indeed, surfactants are not even mentioned in the impacts analysis Section 5. The EIS is lacking in the absence of this disclosure and analysis.

The Garlon 4 and Stalker http://www.cdms.net/LDat/ld01R013.pdf labels provide directions for use. For cut stumps, oil is to be mixed with the herbicide formulation and a surfactant emulsifier is also projected for use. The EIS fails to identify the full tank mixture of surfactants and adjuvants that will be used, nor is their environmental impact discussed and analyzed in the EIS. Whether tank mix is projected to be the same throughout the proposed and connected project area or vary with implementing landowner is not disclosed. The environmental impact of tank mix and variations is not considered in the EIS.

Marking dye is not analyzed for impacts in the EIS though it can have toxic impacts to susceptible nontarget organisms. Marker dyes commonly used are Colorfast Purple or Hi-Light. Colorfast Purple may contain acetic acid, dipropylene glycol, gentian violet and other ingredients. The Material Safety Sheet for Colorfast Purple http://www.beckerunderwood.com/media/products/resources/Colorfast_Purple_MSDS_64D2DC206E76C.pdf indicates that the liquid is expected to be corrosive and to cause burns and permanent injury if eye contact occurs.

According to the MSDS of another spray dye, Colorfast Red, http://www.beckerunderwood.com/media/products/resources/Colorfast_Red_MSDS_B43F5A0C7EE42.pdf the compound contains acetic acid but does not have the corrosive and injurious characteristics of Colorfast Purple. This indicates that another, trade secret ingredient may have greater toxicity in one formulation but is not present in another. The effect Colorfast Purple may have on frogs and other herps, particularly remnant populations of the endangered Red Legged frog is not considered in the EIS. As no analysis is made of surfactants, dyes and other adjuvants that may be added to tank mixes used in the proposed and connected projects, potentially significant adverse environmental impacts are not assessed in the EIS.

EBRPD proposes to use herbicide on "noxious weeds, such as poison oak, [which] would be treated by spraying their leaves if this could be done without affecting nontargeted plants." First, by no authority has poison oak been determined a "noxious weed." It is not listed by California. http://plants.usda.gov/java/noxious?rptType=State&statefips=06
In fact, poison oak is an important California native plant. FEMA's cooperating agency, the U.S. Forest Service has this to say about its benefits to the environment:

IMPORTANCE TO LIVESTOCK AND WILDLIFE :
Black-tailed deer and all classes of livestock browse Pacific poison-oak [53]. It is the most important black-tailed deer browse in some areas of California [5,6]. Birds eat Pacific poison-oak fruits [53].

PALATABILITY :
Pacific poison-oak palatability is rated good to fair for horses and deer; and fair to poor for cattle, sheep, and goats [53].

NUTRITIONAL VALUE :
Percent crude protein in Pacific poison-oak foliage collected throughout California averaged 24.2 in March, 20.6 in May, 10.1 in July, and 6.5 in September [5]. Pacific poison-oak is relatively high in phosphorus, sulfur, and calcium as compared to other browse species [24]. The following mineral content (percentage basis) was reported for the foliage [54]:

Ca	P	K	Mg	S
1.00	0.23	1.13	0.59	0.19

COVER VALUE :
The federally endangered least Bell's vireo uses Pacific poison-oak for nest sites in oak woodlands [25].

Fremont cottonwood (Populus fremontii)/Pacific poison-oak woodlands contribute to bird diversity and density in California [28]. A rare colony of ringtail was found inhabiting a Fremont cottonwood/Pacific poison-oak woodland on the Sacramento River [3].

VALUE FOR REHABILITATION OF DISTURBED SITES :
Pacific poison-oak has been recommended for use in restoration projects. Information on propagation and handling methods to "minimize risks" to planting crews is available [23]. Having worked on field crews in the Sierra Nevada foothills, however, this author recommends using native shrubs other than Pacific poison-oak for restoration.

OTHER USES AND VALUES :
Urushiol has been found to mediate DNA strand scission. This activity may have application in DNA sequence studies [70].

Native Americans used the stems to make baskets and the sap to cure

ringworm [15,60]. Chumash Indians used Pacific poison-oak sap to remove warts, corns, and calluses; to cauterize sores; and to stop bleeding. They drank a decoction made from Pacific poison-oak roots to treat dysentery [60].
Index of Species Information. US Forest Service.
http://www.fs.fed.us/database/feis/plants/vine/toxdiv/all.html

The EIS fails to disclose if other "noxious weeds" or otherwise undesirable plants are targeted for herbicide application nor does it describe what herbicides would be used. The use of herbicides to destroy poison oak is not part of a fire fuels plan. This should be clarified in the EIS.

At 5.1.3.3.1 Best Management Practices, to require as BMPs the application of herbicides during dry weather and low wind conditions fails as a mitigation as these are already regulatory requirements of California and the U.S. Environmental Protection Agency and cannot be considered mitigations. Mitigations must provide relief in addition to regulatory requirements.

The same use of regulatory requirements to substitute for mitigation is found at 5.1.3.3.2, where regulation and court orders are relied on in large part to substitute for mitigation. Labels for the herbicides proposed for use REQUIRE that herbicides not be applied when rainfall is expected or winds are greater than 10 mph, that their application be directly to stumps or not be allowed to drift into surface water. Once the already established regulatory requirements are removed from the mitigations presented for herbicide use in the EIS, there is little left to mitigate potential harm. This is another failure of the EIS to comply with the requirements of NEPA.

Impacts from chipping and leaving material on site

The EIS discloses that all material will be left on site, either through chipping to create up to 24 inch deep layer of wood chips between 1 and 4 inches long, or placement of trunk cut into 20-30 feet lengths. The EIS lacks an adequate discussion of the environmental effects associated with this, particularly in terms of fire potential, spread of disease, killing of undergrowth, and prevention preventing natural regeneration. The EIS indicates it will take up to 5 years for this material to decompose, and there is no mention of replanting native vegetation. What will be the effects of this treated material decomposing into the soil? What impact on soil nutrient composition and soil microorganism populations will be the result of the application and decomposition of wood chips? Can nutrients be discharged to water bodies from the decomposing chips, and what effect would this have? These are significant environmental impacts for which analysis is missing from the EIS.

As the EIS discloses, the wood chip mulch application may lead to a substantial reduction in tree growth in some sites. 5.3.2.2.2. While this may be advantageous in efforts to eliminate eucalyptus and Monterey Pine, it likely will restrict natural vegetation. The EIS extrapolates

from other studies, indicating that decomposition for eucalyptus in the East Bay Hills could take up to 10 years. In the absence of site specific study, the effects of this use of wood chip mulch could further undermine the recruitment of native vegetation, defeating a project purpose.

Impacting native vegetation

In addition, as noted above, the EIS acknowledges that existing and native vegetation will be harmed during project implementation due to use of heavy machinery and pruning. The use of herbicides will further exacerbate this impact.

Impacts to species

The EIS dismisses potential impacts to migratory birds, by claiming that "work during avian nesting and fledging season (February through July 31) would only be undertaken if the treatment areas was cleared by an avian biologist." 5.1.4.3.1. Yet, the EIS states that the work is to be done between August and November, which is a different time frame, and out side of the nesting and fledging season. Thus, it appears that project work can occur between February through July 31. This must be fully disclosed and analyzed, as it is not within the so-called "work window[]" referenced.

The EIS also attempts to dismiss potential impacts to the CRLF, by assuming herbicide application will occur during the dry season, at a time when it is unlikely that the CRLF would be present. 5.1.6.2.2. But the EIS states that the projects will go forward between August through November (3.4.2.1), which clearly includes more than just the "dry" season. Further analysis and consideration of impacts on the CRLF is required given this discrepancy.

Carbon impacts

Removing tens of thousands of trees will remove valuable carbon sinks, in an urban which needs this growth for our health. Indeed, 80% of carbon currently stored by vegetation in the project area is stored in the eucalyptus vegetation. 4.7.3.1. Decomposition of the tree material will also create CO2. This will have a long term impact that is not evaluated. Again, in the absence of a rigorous program to replant, the East Bay Hills will lose a valuable resource. While we understand the need to address wildfire hazard, what is being proposed — and particularly by UCB — is literally overkill, in that there are more constrained and environmentally sensitive means, as EBRPD has illustrated, which can achieve the same purpose without the dramatic impacts associated with clearcutting mature eucalyptus stands and using an intensive herbicide regime.

In addition, removing trees will remove vital summertime fog drip, making these areas hotter and drier. This will make it even more difficult for seed generation. 5.6.2.3.2. The

EIS's reliance on the Caspar Creek study, which focuses on a high rainfall forested watershed in Northern California, is inappropriate, as the site conditions are not at all similar.

We request that FEMA amend the draft EIS and present it again for public review, providing an adequate range of alternatives and informed by an analysis that complies with the requirements of NEPA.

Sincerely,

Patty Clary

Andrew Orahoske

Patricia Clary
Executive Director
Californians for Alternatives to Toxics

Andrew Orahoske
Conservation Director
Environmental Protection Information Center

Claremont Canyon Firestorm

RECEIVED
JUN 17 2013
BY:

Wednesday, June 19, 2013

The Hills Conservation Network's Alternative???

On the 12th of June, I attended a public meeting at the Hillside Club where two members of the HCN presented false narratives and gave specious answers to questions from an issue friendly audience.

I was given opportunity to ask two questions.

I asked if there was an EIS for the HCN alternative proposal?

Dan Grassetti assured me there was.

My second question was; What happens to the native and/or non-native species, living in the thousands of tons of duff and tinder that would need be raked up and removed every year?

I didn't wait for the answer. I had read enough of the milliontrees blog to assess a high probability that the HCN answer would be... *unreliable*.

If there actually was an EIS for the HCN alternative, I would find the answers there. So I walked out of the meeting, and began looking for the evidence.

The Dov Sax paper, which the HCN touts as proof that eucalyptus are not evil destroyers of native habitat, (just friendly developers come to upgrade the neighborhood) does not specify specific species (tongue twister) except to point out that the type and composition of species, varies greatly between the eucalyptus sites and the bay/oak sites. The Dov Sax research is a study of species adapting to changing environments, not a challenge to the consensus opinion that eucalypti destroy native habitat.
All available field research and evidence over the past few centuries, (not to mention the evidence before ones own eyes) concludes; eucalyptus are allelopathic, tend to develop into mono-cultures, and are destructive to the native environment and habitat in the East Bay Hills.

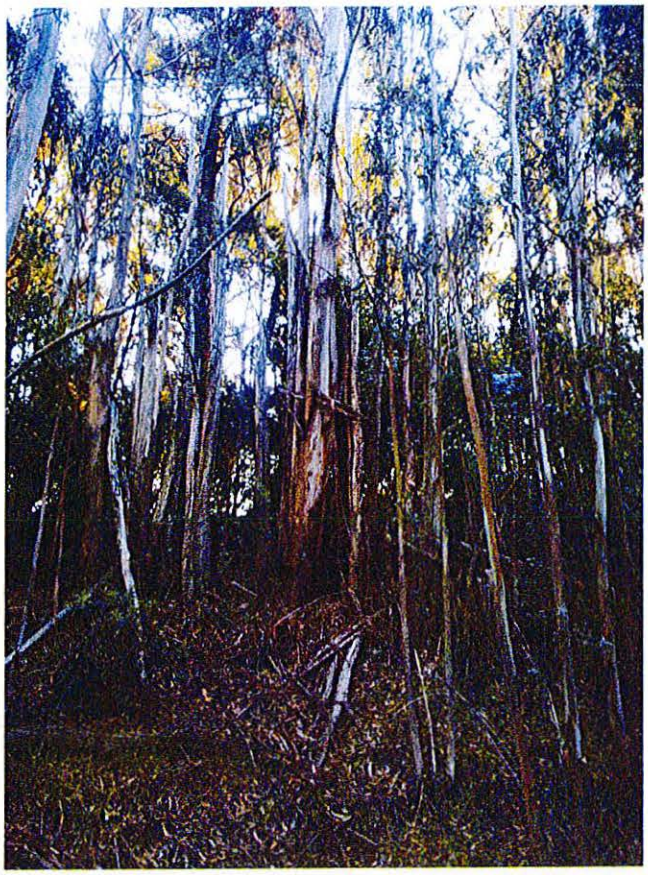
Blog Archive

- 2013 (16)
  - June (16)
    - The Hills Conservation Network's Alternative???
    - My comment to FEMA
    - Lower Big Springs Quarry Trail
    - Eucalyptus Merry-Go-Round
    - Berkeley Hillside Club HCN Public Meeting
    - Manage -vs- Eradicate
    - Follow up photos to Deane Rimerman's Eucalyptus Fo...
    - Ecologic Study Area at Sign Post 25
    - Deane Rimerman's Eucalyptus Fog Drip Myth
    - Here is a BBC documentary of a eucalyptus fire in ...
    - Mid-Canyon Forest
    - Area 29 Restoration
    - The Rispin Grove.
    - I wanted to share this video of the 1991 firestorm...
    - The Claremont/Alvarado Eucalyptus Grove.
    - There is a firestorm building in the Claremont Can...

About Me

Bob Strayer

View my complete profile



The HCN plan calls for removing even the sub-standard habitat provided by the eucalyptus litter on the ground. Eradication of the eucalypti would allow the stunted riparian woodland to recover.

I don't accept the specious interpretation of the Dov Sax study being propagated by the HCN.

My interpretation is; loss of habitat is forcing more and more species to adapt to the more extreme and competitive environment, created by the presence of the eucalyptus forest.

Comparable to bulldozing your home and replacing it with a yurt. Some may find the yurt more desirable, but try and take out a second mortgage. All habitats are not equal.

Some species are learning to make use of the otherwise barren litter on the forest floor, which is comparable to rats, cockroaches, and pigeons, adapting to human monocultures, IE cities.

Is it a surprise to the HCN, that life struggles to adapt to whatever environments exist?

(Might be, judging by their reaction, to the reaction, to their actions ;-)

Why construct an argument in defense of eucalyptus, using the fact that eucalyptus ground fuel provides habitat for many species???

And then propose to remove the very same ground fuels you argued were necessary for creating wildlife habitat???

(I am eager to see how they overcome the cognitive dissonance.)

The HCN alternative proposal, from a wildlife perspective, is a complete non-starter. The eucalyptus trees are already destroying native habitat. Removing the eucalyptus litter from the forest floor would be removing what little habitat is left; leaving many critters homeless. And right about the time some of them begin to recover, the HCN plan calls for the process to be repeated. And it would need to be repeated endlessly because eucalyptus trees drop a lot of litter and eucalyptus sprouts can grow 80 feet tall in 10 years!

The UC Berkeley, eradicate and liberate plan restores the lost habitat from the eucalyptus invasion, by allowing the native woodland to emerge from beneath the oppressive alien canopy.

The HCN calls this a clear-cut pesticide doused hillside

The HCN has characterized the liberation of the native forest as clear-cutting the canyon and dousing it with pesticides. They have misled thousands with a 15 year disinformation campaign to save the eucalyptus.

And for the record, here is what the EIS says about HCN "Alternative"

3.3.1 Alternative Hazardous Fuel Reduction Program Considered But Not Carried Forward for Additional Study

Taken as a whole, a substantial group of public scoping comments suggested the following measures as part of an alternative approach to hazardous fuel reduction:

- Removal of brush and surface fuels
- Removal of lower tree limbs In areas where trees are thick, species-neutral removal of small trees and in some cases understory trees to remove ladder fuels and to create space between trees while maintaining shade to suppress growth of shrubs and grass
- Removal of eucalyptus debris that falls off the trees after a freeze
- Keeping grass short by mowing or grazing, especially along roads

You can read consideration in the EIS, but here I am skipping to the evaluation and reason given for not studying the idea further.

3.3.1.4 Combined Alternative Program

The alternative hazardous fuel reduction program outlined at the beginning of this Section 3.3.1
has two fundamental weaknesses, as illustrated by the discussions of its components in Sections
3.3.1.1 through 3.3.1.3. First, its species-neutral approach does not adequately address the special
characteristics of eucalyptus and Monterey pine trees that can make wildfires difficult or even
impossible to control (see Section 3.3.1.1). Second, its reliance on continuous removal of ladder
fuels under tall trees on steep slopes would likely be prohibitively expensive and increase

erosion
by disturbing soils. **For these reasons, this alternative fuel reduction program would not meet the**
purpose and need and was eliminated from further study.
(emphasis mine)

http://ebheis.cdmims.com/Libraries/Site_Documents/1_2_3.sflb.ashx

The FEMA EIS says the HCN plan is unworkable. So the HCN plans to sue any agency who refuses adopt it.

Something is seriously wrong with this logic.

Posted by Bob Strayer at 10:50 AM 2 comments

+2 Recommend this on Google

Monday, June 17, 2013

My comment to FEMA

June 17, 2013

East bay Hills EIS
Federal Emergency Management Agency
PO BOX 72379
Oakland, CA 94612-8579

Dear FEMA Staff Members,

As a concerned citizen an resident of Claremont Canyon, I feel strongly about eradicating the eucalyptus from the East Bay Hills. These trees are suppressing a riparian woodland, stunted by the overhead eucalyptus canopy, increased soil pH, and poisoning native soil microbes.

I have recently photographed the managed and unmanaged eucalyptus groves, as well as the post eradication recovery areas. All the photos, numbering in the hundreds, are publicly available via my blog. ccfirestorm.blogspot.com

These photos document the immediate threat these trees pose to the community, and the unfeasibility of routinely thinning, limbing and clearing literally tons of ground fuel every five years. This procedure is very disruptive, destroys habitat, kills wildlife and causes erosion.

Any sensible fire mitigation strategy undertaken should have as it's long range goal the eradication of eucalyptus in the East Bay Hills, particularly the Tazmanian Blue Gum. The tremendous amount of ground fuel they create, the rugged and inaccessible terrain they inhabit, and the extreme fire danger they pose, all make keeping these trees an unacceptable risk.

After eradication, the entire ecosystem begins healing, the native microbes migrate back into the soil, and the native habitat returns. Once reestablished, the riparian woodland of the East Bay Hills is far less dangerous and easier to manage without major environmental disruption. The Sign Post 29 post eradication recovery area is clear evidence that the concerns of 2009, that the native woodland would not recover, were and are unfounded.

Clearly, the safest, most economic, environmentally sound, and sensible solution to the dire threat posed by the Eucalyptus trees in the East Bay Hills is eradication and restoration.

WE CAN TURN THIS . . .

× Inline image 1

INTO THIS . . .

Inline image 2

AND THIS . . .

Inline image 3

OR,

A FIVE-TEN YEAR ROTATION BETWEEN THIS

Inline image 4

AND THIS.

× Inline image 2

The choice is clear and obvious. Eradication, then managed recovery of the native habitat is the sensible solution to long term fire risk management in the East Bay Hills.

Sincerely,

Bob Strayer,
Resident, Claremont Canyon, East Bay Hills
blog: http://ccfirestorm.blogspot.com/

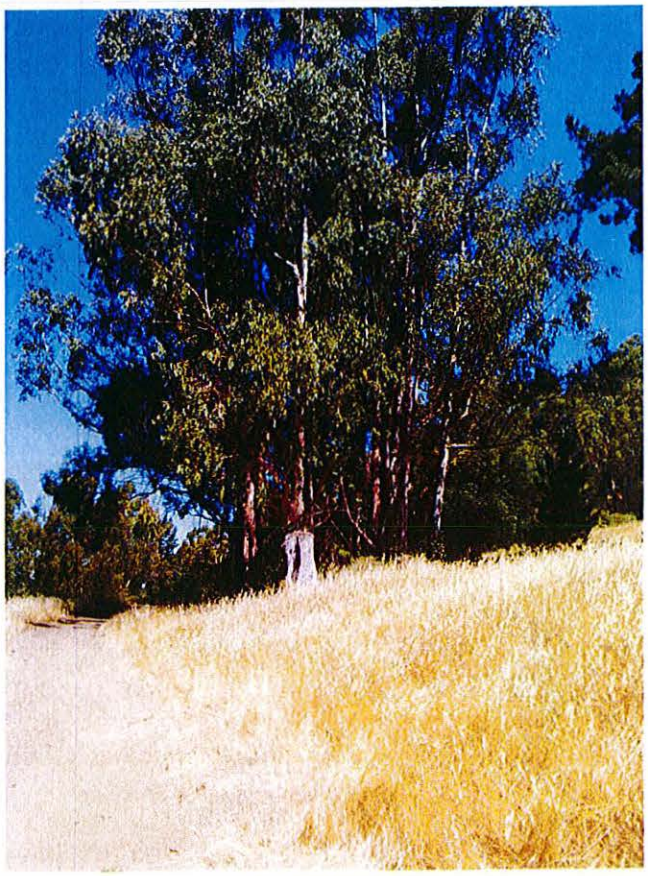
Posted by Bob Strayer at 10:37 PM 1

+1 Recommend this on Google

Lower Big Springs Quarry Trail

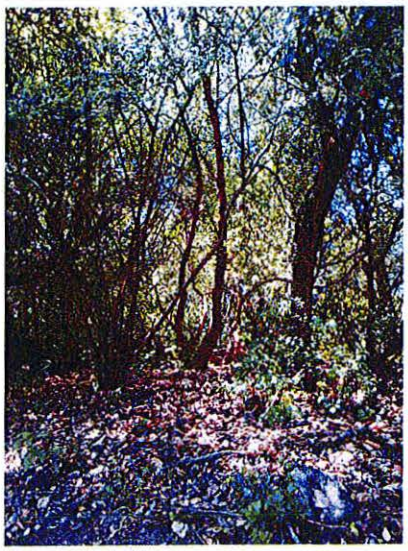
Here are the photos I took from the fire trail across from the golf course.

Bay and oak at the trail head.



The first grove near the trail

Not terribly attractive up close.



Native woodland with a west coast manzanita

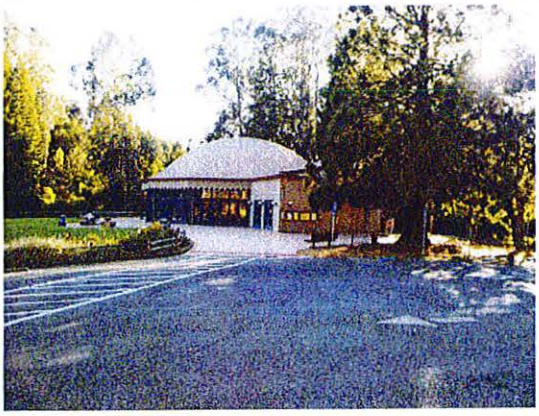
Posted by Bob Strayer at 2:12 PM 1

+1 Recommend this on Google

Friday, June 14, 2013

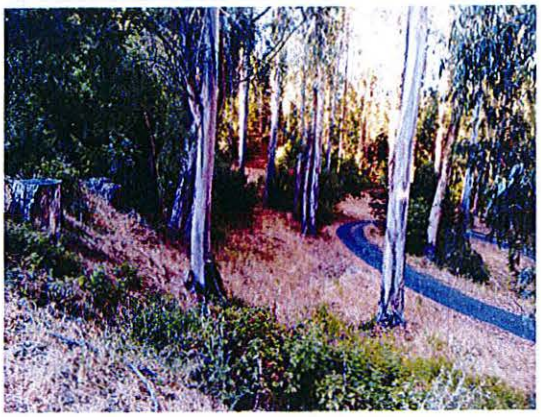
Eucalyptus Merry-Go-Round

Here are the pictures I took of the Merry-Go-Round.



Merry-Go-Round in Tilden Park

There are two nearby picnic areas. Here are the trees near one area.
Note the stunted native trees.

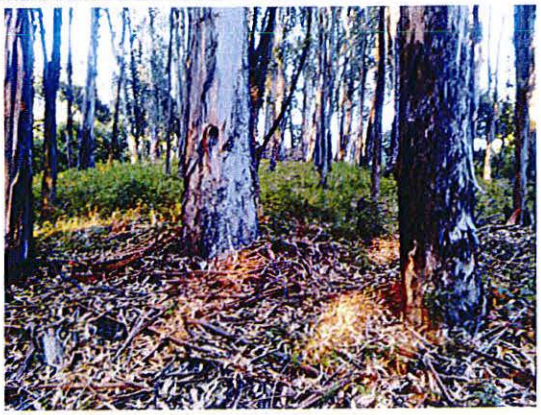


This is a managed grove near modern infrastructure

Here is the other picnic area.

Behind these trees is a eucalyptus grove with a poison oak floor.

Here is the eucalyptus grove behind the native picnic area.



Poison oak mono-crop under eucalyptus.

Where should we put the picnic table?

In my opinion, the environment surrounding the native trees is much more inviting and enjoyable than the eucalypti. But that is a subjective argument, which varies with the subject making the argument. Since this area is developed, used by many people, and the trees are easily accessible. It is not comparable to the rugged, undeveloped areas that are the primary focus of the FEMA grant.

I would argue that the methodology used here on a few small groves is not practical for an entire forest. The process is as harmful to the native species, as the full eradication, and

would have to be repeated on a regular basis. A riparian woodland is much easier to manage, less dangerous, and from my perspective, creates a more pleasing environment.

Hopefully I will get to captions on the pictures by this evening.

Posted by Bob Strayer at 8:09 AM 1

+1 Recommend this on Google

Thursday, June 13, 2013

Berkeley Hillside Club HCN Public Meeting

I went to the HCN meeting tonight. I was a few minutes late, but caught the part of the introduction where they announced that the evidence they would be presenting was based on published scientific research, not anecdotes.

During the anecdotal recital of trying to light eucalyptus leaves on fire, being presented as evidence debunking the commonly held myth by Australian firemen, that eucalyptus spot fires downwind... (must be some other cause for all the spot fires up to 10 kilometers downwind of the fire line in the 2011 fire.) ...I interrupted saying; "IT'S THE BARK NOT THE LEAVES!" The speaker then added that he had also tried lighting the bark.

I could contain myself no longer. I stood up, said; "YOU'RE TELLING ME YOU TORCHED A 150' TREE AND ANALYZED IT'S EMBER DRIFT! Snorted in disgust, and started walking out.

Someone told me we all must wait our turn to speak. I said I was done speaking. Tired of listening to lies, and walked on out. I went around the corner, unlocked my bike, and realized I had to go back in for my coffee cup.

Maybe 4 shots of Peet's before the meeting wasn't the best idea I've had recently, but I was very tired.

When I came back to get my cup, some of the people there asked me to stay and speak, that they were very interested in hearing what I had to say.

So I went back to the greeting table at the entrance and listened for awhile. The gentleman manning the table engaged me in whispered conversation. I gave him a link to my blog.

I then interrupted another anecdotal story, about fires on Angel Island.

The speaker began the narrative by saying never in history had there been a fire on Angel Island. Which is not true, there have been multiple building fires. Humans are the constant in all the fires, not vegetation.

If the eucalyptus groves on Angel Island were anything resembling the ones in the Claremont Canyon. Humans would only venture into them with protective gear. They definitely would not be hiking, or camping, or having a picnic on a carpet of eucalyptus bark and leaves, intertwined with poison oak rhizomes. Without humans in the forest, it is far less likely to burn. IMO, on Angel Island it is worth the risk of introducing human vectors, for the recreational value alone.

The FEMA grant has no bearing on Angel Island, so telling anecdotal stories about fires there is a red herring fallacy, a distraction. Since it was the very people running the meeting who kept making these these specious and fallacious statements, I felt compelled to speak out, just like at their milliontrees blog, the narrative was being very tightly controlled. I wanted no part of it because I experienced how they use dissenters on their blog. The difference here was, the moderator could not censor me from speaking out, all he could do was respond with another fallacy and move on. Any rebuttal would be considered "repetitive". Since he controlled the meeting, it would not be a fair discussion and I wanted no part of it. If they want an open discussion, they should engage in open dialogue, and get beyond these controlled narratives.

The room asked that I be allowed to speak out of turn. They gave me 2 minutes. I went up to the mike, asked my questions; Is there an EIS covering the other agencies plans, and what is the impact of removing all that debris that native species are using because their native habitat has been taken over by eucalyptus?

I then told the crowd that I had pictures of the restoration site published on my website that show the narrative being presented by HCN and their claim that the restoration site is a disaster to be a lie.

I told them; I am a massage therapist. I will give anyone who goes up the restoration site, takes a picture before the 17th, and shares it with me on Google+, $30 off a massage, or a free 30 minute massage.

All they need to do is go and look for themselves, walk the trails, and take a picture that I can share on my blog.

At least they will have seen the site in person before making their comment to FEMA, or signing any petition. Or if they already have signed or commented, they can change their comment, and/or sign a different petition.

I will make good on this offer to anyone. Limit one per person.

I believe that once people see the difference for themselves, they will back the gradual eradicate and restore option, over the thin and remove every 5 years option.

Restoration is what is in store for the mixed growth eucalyptus forest across the road from the restoration site. It will undergo the same transformation from eucalypti forest into stunted riparian woodland, and eventually into a mature woodland. In the coming decades the canyon will be a safer, more accessible, and more enjoyable than the current weed invested tinder box.

So as I turned to walk out, The primary speaker wanted to answer my question about how the species that rely on the eucalyptus litter, since there is little else under a eucalyptus aside from litter and poison oak for habitat, were going to fare when the proposed thin and remove plan removes their habitat every 5 years.

I said I had heard enough and continued on my way out the door.

Posted by Bob Strayer at 12:17 AM 1

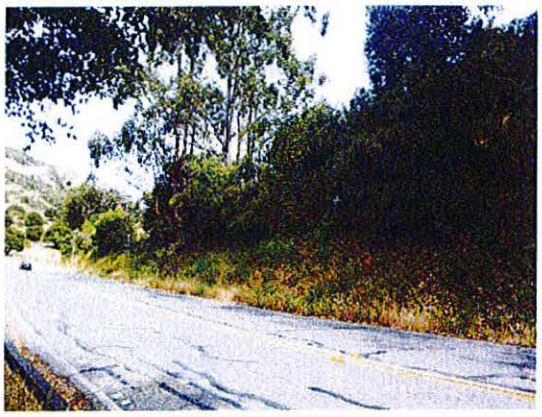
+1 Recommend this on Google

Wednesday, June 12, 2013

Manage -vs- Eradicate

The proposal being put forth by the HCN, and apparently being adopted by the City of Oakland and the East Bay Regional Parks District, is to thin the groves and remove tons of duff and tinder on a five year rotation.
Traumatizing the ecosystem every five years may be acceptable along the highways, but definitely not in the forest.

I would argue that based on the photos I took of the various methods employed along the highway... eradication provides superior long range results.



Grizzly Peak South of 4 Corners

This was the most favorable light I could cast on the eucalyptus side of the road.

This is the other side of the road.

I invite everyone to view the entire album.

[edit] I added more previous photos of the roadside, taken earlier this month [/edit]

Posted by Bob Strayer at 11:13 AM 1

+1 Recommend this on Google

Monday, June 10, 2013

Follow up photos to Deane Rimerman's Eucalyptus Fog Drip Myth

As promised, I went up to restoration area to see how well the ground beneath the trees is faring moisture wise. Here are all the photos.

Well, there wasn't much fog drip to begin with, so no big surprise here.

Most of it evaporated here as well.

Or maybe not. Here is clear evidence that the ground is still moist from the fog drip from the coast live oak canopy above.

The ground under the redwoods would still be moist of course. These future giants produced enough fog drip to saturate the ground and create a little surface runoff. Redwood fog drip can penetrate the ground up to 35cm.

Posted by Bob Strayer at 1:00 PM 5 comments

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RECEIVED
JUN 17 2013
BY:

Sonia Diermayer
12721 Brookpark Rd.
Oakland, CA 94619

FEMA, Region IX
P.O. Box 72379
Oakland, CA 94612-8579

June 17, 2013

(Submitted as email attachment sent to: EBH-EIS-FEMA-RIX@fema.dhs.gov)

Re: FEMA East Bay Hills Hazardous Fire Risk Reduction EIS – OPPOSE

Dear Officials at FEMA, Region IX,

I strongly oppose the conclusions of the EIS covering a suite of tree and vegetation removal projects along the East Bay Hills urban-wildlands interface, proposed by UC Berkeley, City of Oakland and the East Bay Regional Parks District. Cumulatively, this draconian intervention would make the East Bay hills a hotter, dryer, more slide-prone, less healthy, comfortable and less safe environment for human habitation and recreation, and would drastically impact local ecosystem and watershed values.

While stands of eucalyptus, acacia and monterey pine--the main targets of the projects—may be non-native to our area, they have come to fulfill innumerable useful roles for people and the environment. For wildlife they provide direct cover, food, roosting and nesting habitat. And the aesthetic, recreational and property-enhancing values of trees and forested groves on the UC Campus, along the hills and in the East Bay Regional Parks are obvious and indisputable. The long-term or permanent impacts to these values are poorly described and not mitigated in the EIS and there is no way to mitigate the damage, which will be inflicted at the proposed scale.

However there are innumerable other serious flaws in the EIS and its basic assumptions, which I will elaborate on below. These center around devastating effects on Water Resources, Air Quality, and Climate and Microclimate, and Cumulative Effects, as well as the flawed assumptions about reduction of fire hazards.

Cumulative Impacts on Water Resources, Air Quality, and Climate and Microclimate insufficiently addressed

The trees, groves and forests targeted by these projects fulfill extremely important physical and watershed functions in the environment. The detrimental cumulative impacts on Water Resources, Air Quality, and on Climate and Microclimate that would result from the loss of such ecosystem services, and the accompanying consequences for

environmental and human health and safety are not sufficiently analyzed and acknowledged by the EIS.

Factors which would be very significantly impacted on a continuous basis by the proposed tree and vegetation removal include ground shading, temperature reduction, fog capture and drip, soil enrichment and moisture retention, carbon absorption, oxygen production, precipitation-slowing, erosion control, runoff filtration, hillside stabilization, and wind protection. Cumulatively, these factors provide a tremendous amount of water-retention and air quality improvement in the environment, ensuring cooler, moister, more comfortable, and safer climatic conditions for residents, wildlife benefits, and more pleasant, healthier conditions for recreational users of public lands.

These climatic and watershed benefits in turn provide economic and health benefits for business and private property owners through improved property values, greater climate comfort, lower water and energy use, translating into smaller carbon and water use "footprints" as the shade, moisture and cooler temperatures allow them to forgo air conditioning and landscape irrigation.

The promise of native species spontaneously replacing the removed trees is repeatedly held out as mitigation in the EIS. But the projects do not include significant planting of native oaks, bays or other trees, and even if they did, it would take many decades before those would mature sufficiently to provide anything approaching replacement of the lost ecosystem cumulative services.

Water Resources

Specifically, Water Resources are defined far too narrowly in the EIS. Only impacts on water *quality* are considered—not on water quantity or seasonal timing. The importance of fog drip for the entire watershed and water cycle is mentioned but not taken seriously. The fact that more precipitation immediately hits the ground during winter rain events after tree removal in no way helps the watershed compensate for the loss of summer fog drip and summertime moisture retention in the landscape due to shading!

The massive logging operations that will be needed to carry out the proposed work will in themselves cause immeasurable harm to the affected watersheds. Similar to logging in the Sierra Nevada, even with good faith attempts at mitigation there will be vehicle and equipment pollution, groundcover damage, soil erosion and compaction, and herbicide runoff from cutting, loading, chipping and hauling operations.

Likely leaching of eucalyptus or pine resin from chipped wood into ground or surface water with potential effects on aquatic habitat is mentioned, but impacts are not addressed.

BMP's to protect surface water from herbicides (50 foot buffer, etc) do not prevent herbicides from percolating into groundwater (5.4.2.3).

Air Quality

Specifically, CO2 emissions under the No Action Alternative would not only be negligible, they would be NEGATIVE due to carbon sequestration by the vegetation. So they MUST be compared to the Project emissions, because it means that the effects of project emissions are relatively greater than stated.

The Project Alternative mostly addresses air quality impacts of vehicle and equipment use and burning of slash. The EIS fails to quantify the CO2 that is removed from the atmosphere yearly by the current forest and vegetation, which would further reduce the emissions under No Action Alternative. The loss of that sequestration capacity needs to be accounted for under Proposed and Connected Actions (EUC=327 metric tons/acre, Mont Pine=185 m tons/acre; project total= 78,600 m tons). Yearly additional CO2 sequestration is not quantified and included in the comparison.

Carbon emissions from decomposing wood chips are NOT included in this section.

Climate and Microclimate

This portion of the EIS relies on very questionable reasoning. Again, significant CO2 emissions are listed for the No Action Alternative, based on a highly improbable cataclysmic fire event. But the definite known carbon sequestration resulting from the yearly activity of tens of thousands of large mature trees is not considered. This is a serious misrepresentation of the climate change calculus.

Under the Project Alternative projected emissions from decomposing wood chips total 1,500 m tons/yr and are totally discounted by claiming it will be absorbed by new vegetation. Also the total anticipated emissions of 2,050 m tons/yr does not include those caused by burning, due to a claim that new vegetation will absorb them. New vegetation will not grow while the chips are covering the ground and certainly not before the burning occurs! (Not to mention that fast-growing new vegetation would be invasive species which will be herbicided away!)

The reasoning for no significant climate impacts also claims that while microclimate will have more extreme daily swings, the daily "average will be unaffected". People and the environment do not live by averages, but by rather realtime conditions. According to the EIS, those will be hotter and dryer during the day. That already means more likelihood of fire, decreased comfort for residents and recreational users.

The EIS fails to consider that the cooler, moister ambient conditions resulting from current tree cover indirectly do a great deal to stave off the increasing effects of climate change. The current project will create dryer, hotter ambient conditions in soil and air on more days along a wide swath of the East Bay ridgeline, on the UC Berkeley Campus and on Oakland hillsides. Additional projects envisioned by the City Of Oakland on public and private lands will compound these harmful effects. Vegetation removal on the scale

proposed will magnify the impact of two very dry winters and hasten and increase the detrimental impacts of global climate change. These impacts have secondary human health, safety and economic repercussions.

In conclusion, the loss of the services that the targeted trees and groves currently provide—particularly in the areas of Water Resources, Air Quality, and Climate and Microclimate—are not sufficiently described and accounted for under the specific topic areas nor under Cumulative Impacts, and these issues cannot be adequately corrected through mitigations in the current EIS.

Fire Danger – Flawed Comparisons, Assumptions

The conclusion that favorably compares the ES.7.2 Proposed and Connected Actions with the ES 7.1 No Action Alternative is based on fundamentally flawed logic. The damage from logging operations and the lost watershed and ecosystem services under the ES.7.2 Proposed and Connected Actions would definitely occur within the 10 years of the project, and would last many decades. The harmful effects listed under No Action across many of the environmental impact categories, are based on the assumption of an equally definite single fire event simultaneously devastating the entire project area. In fact, *disastrous wildfires have a relatively small statistical likelihood of occurring, and practically no likelihood of affecting the entire project area within the same 10-year span.*

So, while under the No Action Alternative *qualitatively* fire might cause significant damage to the environment at a given location *if and when it occurred*, the multi-agency vegetation removal proposal will *quantitatively* far exceed them in absolutely certain, immediate, long-lasting detrimental implications for the entire East Bay ridgeline environment from Richmond to Oakland. The purported comparison of effects from two scenarios with completely different probabilities is misleading and inappropriate. This flawed comparison invalidates the conclusion favoring ES.7.2 Proposed and Connected Actions over ES.7.1 No Action Alternative.

Another major flaw is that the EIS assumes that the draconian changes to the East Bay Hills will actually reduce property damage or loss of life. Rare wildfires are a natural part of California's landscape. Any desire to alter that regimen is unrealistic. Fire will undoubtedly continue to shape the East Bay ecosystem, with somewhat unpredictable ignition points and burn patterns. Burns may well ignite within urbanized areas of the hills, where the proposed vegetation reduction will have no benefits.

In fact the proposals cannot offer any guarantees of lessening the danger, and in fact may contribute in multiple ways to raising the fire danger. Many work teams using diesel fueled and mechanized equipment to remove vegetation in and of itself represents a hazard. Deep layers of chipped wood could spontaneously combust during the decomposition process. And the reduced moisture levels and higher temperatures resulting from removal at this scale will undoubtedly worsen fire hazard.

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It would be utterly foolhardy to voluntarily destroy vast portions of the well-established natural system that provides the East Bay Hills with free air conditioning, moisture, slope stabilization, living watersheds and attractive, healthy recreational opportunities, and in doing so worsen the effects of climate change and fire danger, all under an *assumption and a hope* that it might prevent wildfire losses.

I strongly urge FEMA to adopt the ES.7.1 No Action Alternative and reject the funding application, and I urge all the agencies involved to immediately abandon their implementation plans and seeking of funds for the proposed environmentally damaging suite of projects presented under ES.7.2 Proposed and Connected Actions!

Respectfully submitted,

Sonia Diermayer
Homeowner

RECEIVED
JUN 17 2013
BY:

2915A Wheeler Street
Berkeley, CA 94705
15 June 2013

Re: EIS for FEMA's proposed fire-reduction projects in the East Bay Hills of the San Francisco Bay Area.

With reservations, I generally support the proposed plan as outlined in the EIS. I believe the EIS is deficient, however, in its lack of a realistic plan to respond to a particular and very significant problem that will result from the project as described.

Maintenance for 10 years may result in elimination of large-stature trees that are especially fire-prone, but a much longer-term program will be needed to ensure that the proposed project doesn't result in low-value, broom-dominated environments that remain at extreme risk of fire. The various land-management entities should consider a staged implementation of the overall project (having identified the most fire-prone priorities) to avoid being immediately overwhelmed in the maintenance phase.

For almost 20 years, I have been involved in wildlands weed management, mostly as a volunteer. I have worked with professional land managers, using mapping to identify and track weed populations, and using a variety of methods to control exotic and invasive plants. This work has included mass removals of large, long-standing French broom infestations, along with careful---and sometimes not careful enough---programs of post-removal follow-up. During this same 20 years, I have regularly visited various East Bay Regional Parks and UC Berkeley land, spending most of my time in the area of Claremont and Strawberry Canyons. I am an inveterate weeder.

In many areas (e.g., the generally south-facing slopes of Claremont-PDM) where Eucalyptus and other exotic trees will be eliminated, there will be an explosion of French broom that will be extremely difficult to control. Eliminating eucalyptus and other exotic sprouts and re-sprouts will be comparatively easy IF the monitoring and maintenance is regular and thorough for 10 years. That job will be severely hampered, however, by the surging growth of scrub species (native or not) when competition for light is reduced.

Seeds of French broom remain viable for many decades. In Claremont Canyon-PDM, for example (much of which was already logged decades ago) large, mature broom have been flowering for years, deep in the understory. There is an enormous volume of seeds waiting to explode. These sprouts will probably begin producing additional seed in as few as two years. If this is not diligently and thoroughly controlled, the long-term problem of this particularly troublesome species will grow out of control.

The results will be 1) the mass displacement of numerous native species that the proposed plan supposedly favors; 2) long-term establishment of broom monocultures that are of low biological value; and 3) very significant fire risk, as broom is highly flammable and fast burning.

This likely scenario belies the statement on p. 5.1-2 of the EIS, that "[t]hrough eradication of non-native, invasive, and fire-prone species (eucalyptus, Monterey pine, and acacia), native vegetation communities would experience long-term beneficial effects." How can this be so if the result is a broom monoculture?

It would be a terrible shame for the proposed project---which I generally support---to result in the explosion of broom. Yet, the proposed plan's 10-year monitoring and maintenance plan will surely have this result in numerous parts of the project area, especially if implementation of follow-up measures is inconsistent or ineffective.

The draft MMPs (see Section 5.1), which are cited by the EIS to describe the different proposals for follow-up control of exotic invasive species, do not inspire confidence when viewed in the context of some landowners' present methods. While it would be unreasonable to expect the reviewing agencies to attempt to analyze and implement a 60-year program for the elimination of broom, we all need to recognize, for example, that EBRPD and UC Berkeley already lack the resources and/or organization to deal with the most damaging exotic-species infestations in an effective manner. Trailside broom thickets (and hemlock, milk thistle, Italian thistle, mustard, euphorbium, etc.) are allowed to grow in Strawberry Canyon, for example. Then, they are either cleared with bulldozers (with resulting soil disturbance that exacerbates infestations) or sprayed with foliar herbicides and left standing. In the latter instance, some dead broom thickets have remained for years, preventing access to control living broom farther from the roads---and just waiting to be ignited.

The sensible policy would be to implement the fuel-reduction program in steps to ensure that no more land is cleared each year than the amount for which a systematic, thorough, long-term (20 years) can be initiated. Under the proposed plan, completion of the tree removal within just a few years will almost assuredly leave us with horrendous broom infestations that are biologically impoverished---and still dangerously flammable.

Thank you for considering my comments.

Sincerely,

Philip Batchelder

From: stuart phillips
To: EBH-EIS-FEMA-RIX
Subject: DO NOT CUT ANY TREES IN OAKLAND/BERKELEY CA EVER!
Date: Friday, May 17, 2013 10:02:30 AM

DO NOT CUT ANY TREES WHATSOEVER IN BERKELEY, OAKLAND, OR ANYWHERE IN THE BAY AREA OF CALIFORNIA, EVER!! THESE MISGUIDED PROJECTS WOULD ACTUALLY EXACERBATE FIRE BY DRYING OUT SOIL, CREATING MORE FLOOD & MUDSLIDE PRONE AREAS WHERE CUT, INCREASING HEAT TO AREA.
TREES SHADE, MOISTEN SOIL, KEEP WATER FROM RUNNING AWAY, KEEP SOILS INTACT, PROVIDE WILDLIFE & QUALITY OF LIFE HABITAT, SHADE ENVIRONMENT, CLEAN AIR.
DO NOT CUT ANY TREES IN OUR BAY AREA, EVER, THIS IS A HUGE WASTE OF MONEY THAT DESTROYS OUR LOCAL ENVIRONMENT TOTALLY AT BEST!
stu lips, oakland, ca

From: Catherine Sullivan
To: EBH-EIS-FEMA-RIX
Subject: the killing of 85,000 trees.
Date: Thursday, May 23, 2013 4:40:41 PM

I strongly oppose this and I am utterly shocked that this would be considered. Quoting an article: "The trees in Strawberry and Claremont Canyon have been there for decades and hardly constitute a "hazard." But pouring 1400 gallons of herbicide on the currently pristine hills will create a real hazard, and UC Berkeley even plans to use the highly toxic herbicide "Roundup" to squelch the return of non-native vegetation."-Randy Shaw

How can you do this? I will pass this on to every Berkeley environmental graduate I know. Destroy the beauty of our hills? Why not use the money to hire extra park/enviromental service people. You'd be surprised at how many citizens would volunteer weekend time to help abate the non-native plants by hand. Try Americorp, for Pete sake, but don't use poison.

Catherine Sullivan

From: Roberta Suronen
To: EBH-EIS-FEMA-RIX
Subject: Eucalyptus Removal in East Bay Hills
Date: Saturday, May 18, 2013 9:36:07 PM

To whom it may concern,

As long time residents in the Oakland hills, we are in support of removing eucalyptus from the hillsides. This species of tree is a fire hazard and nonnative. It also rather invasive. While the Mediterranean climate of the Oakland hills is naturally prone to fire, it is important to effectively manage fuels at the wildland-urban interface; the eucalyptus are only making our hillsides more flammable.

If the trees are removed, we would encourage you to consider vegetating the hillsides with "climate smart" planting. This term was coined by Point Blue (Pt. Reyes Bird Observatory) to describe planting designs that include a variety of species that would supply wildlife with resources year round and include drought tolerant species (in preparation for predicted climate shifts). These plans would include redwoods trees but also a mosaic pattern of other species to allow for variation.

Sincerely,

The Suronen family

Sent from my iPad

From: Susan Schickman
To: EBH-EIS-FEMA-RIX
Subject: Berkeley tree cutting in Strawberry canyon
Date: Sunday, May 19, 2013 1:11:02 PM

Dear FEMA:
I wish to register my strong protest against this plan. This is a wonderful hiking and nature area used constantly by UC Berkeley students and Berkeley residents. Removing the trees, spraying with a known carcinogen Round up and added flammable woodchips is a ridiculous way to reduce fire danger. It is environmentally and ecological unsound and may, in fact, increase fire danger and erosion.
FEMA needs to consult with environmentally savvy professionals and come up with a more appropriate plan than destroying and poisoning an entire eco structure in the midst of our community.
I rarely protest but I can guarantee that this plan will get me and my neighbors actively involved in stopping this short sighted and scientifically unsound plan.
Sincerely,
Susan Schickman
Berkeley Resident and property owner
1019 Euclid Avenue
Berkeley, CA 94708
510-524-0909

J A N I C E T H O M A S

37 Mosswood Road
Berkeley, CA 94704

June 16, 2013

Sent via electronic mail EBH-EIS-FEMA-RIX@fema.dhs.gov

California Emergency Management Agency (Cal EMA)
Federal Emergency Management Agency

Re: Strawberry Canyon PDM-PJ-09-CA-2005-011

To Whom It May Concern:

I live in Strawberry Canyon and should have every reason to be pleased about the proposed fire fuel mitigation projects in Strawberry Canyon, Claremont Canyon, and Frowning Ridge. However, rather than being pleased, I am struggling with my impression that the Strawberry Canyon project is too radical.

The Strawberry Canyon portion of this FEMA-funded project removes virtually every tree in a 56 acre wilderness area (22,000 trees in 56.3 acres in Strawberry Canyon), a fact that I think might raise concerns among people everywhere who care about wildlife. Instead we constrain ourselves out of a naïve appreciation that this project is undertaken for our benefit and having been seduced by the false belief that it will save our lives, our homes, our precious constructed world, which I mean sincerely and not sarcastically.

But there is enough scientific argument and criticism of this project to convince me that I will not be any safer and will instead have lost the preciousness of a place that is bigger than my home and neighborhood.

A recent article in the East Bay Express
http://www.eastbayexpress.com/oakland/is-uc-berkeleys-plan-to-cut-down-54000-trees-necessary/Content?oid=3577198 cites a critique
http://www.eastbayexpress.com/general/pdfs/URSCorpLetter.pdf
of the proposed project that was written by the global consulting firm URS Corporation. This is the same corporation that served as project management consultants for the Southeast Campus Integrated Projects, otherwise known as the stadium rebuild and ancillary buildings construction project. URS is a conservative group whose former director was UC Regent Richard Blum. Yet even URS criticized the Strawberry Canyon project, citing numerous unsupported assumptions which if false would lead to errors and disappointing outcomes. The URS letter explains that, among other problems, a 24 inch pile of eucalyptus mulch will itself pose a fire hazard. It will not provide a suitable medium for the return of natives and will instead create conditions for faster growing, more aggressive, exotic, non-native species which pose their own fire hazards. But

many of us have been convinced that we will be both safer as well as be creating a more sustainable natural landscape, which is the opinion of no less than the California Native Plant Society's East Bay Chapter.

And in response to public fears of future development in the area and public understanding of UCB's Regent-approved Long Range Development Plan which proposes building in its "Hill Campus," Tom Klatt, project manager of the FEMA project is quoted as saying, "Frankly, if we wanted to develop the area, why would we turn it into a pristine native forest?" So that is the promise: The return of natives and a forest of another kind.

Many people have taken the bait and believe that coastal live oaks will populate the area, while at the same time they believe that the area was "treeless" in the 1800's. These two ideas are wholly contradictory. If natives had not volunteered by the 1800's, how might they volunteer in the 2000's? Coastal live oaks proliferate on the north-facing slope of Strawberry Canyon and in riparian areas on the south-facing slop of Strawberry Canyon, but that is not to say they will proliferate in sunnier, non-riparian locations where eucalyptus thrive, e.g. the slope where the Strawberry Canyon project is located.

In the past, the University of California at Berkeley has not lived up to its promise in the post-treatment phase of tree cutting. This is evident from the exotic weeds that took over the Lower Jordan Fire Trail after the Monterey Pine thinning on Panoramic Hill in the 1990's. Is it possible that instead of a "pristine native forest," 56 acres will be overrun by rodents (there being fewer raptors who roost in the area) and invaded by weeds?
The promise of natives seems more like a public relations ploy than an outcome that can be guaranteed.

And to what extent is the return to natives an essential element of fire fuel mitigation? If it is not guaranteed, then it is not a mitigation.

And to what extent will the "treatment" work? What if the two foot high piles of eucalyptus compost chips do not decay in a five years but instead 10 years as the URS critique suggests? And what are the risks posed by dried out eucalyptus lumber from 22,000 trees lying around in Strawberry Canyon? And from the potential spontaneous combustion from mulch heating up in order to decay? And from the French broom which happily proliferates? And what about the synergistic effects of all of these?

It is sheer speculation that the maintenance phase of this project will lead to increased native vegetation and therefore improved conditions for the various species, some of which are endangered. It seems more likely that piles of compost two feet high, heavy equipment, tree skidding, and application of herbicides will lead to less native vegetation and therefore less habitat for biological resources.

Already, we have seen the disappearance of the Alameda whipsnake at the mouth of Strawberry Canyon after Lawrence Berkeley National Laboratory (LBNL) extended their

perimeter for purposes of fire safety. The LBNL perimeter is now a safer area, but also an obviously unnatural place.

We are led to believe that the natural environment will change but will also be improved habitat after the 56 acres of trees are removed. The southside of Claremont Avenue above signpost 29 is used as a fine example of native plants being restored as a result of removing eucalyptus. However, according to Jon Kaufman, Stewardship Chair of the Claremont Canyon Conservancy, the restoration of native plants was facilitated by the help of numerous volunteers who were organized through the Claremont Canyon Conservancy. "Our work has been to remove invasive plants including the occasional eucalyptus stem and nurture the regrowth of oaks, bays and willows and native scrub," he wrote in a treatise titled "Myths about the EIS."

The Strawberry Canyon project site in contrast is a more remote location, more difficult to access, and therefore more difficult to maintain. The Claremont Canyon Conservancy has been promulgating this project in Strawberry Canyon. So, should this project go forward, I hope they at least provide the volunteer help needed to reduce the growth of weeds and to protect natives which might otherwise volunteer.

I suppose I'm wondering at what point we will cease and desist? At what point will the fire fuel mitigation interventions stop? Which measures might be considered too great? For example, if UC Berkeley removes 56 acres of trees in Strawberry Canyon for purposes of our collective safety, might they finish the job and remove the aged and diseased Monterey Pines on Tightwad Hill which are located at the mouth of Strawberry Canyon? Wouldn't spotting be a concern at this tree plantation as much as at any other? http://upload.wikimedia.org/wikipedia/commons/thumb/6/69/Tightwad_Hill.jpg/220px-Tightwad_Hill.jpg I am not sentimental about this particular location, but I have sympathy for those who are.

This particular fire fuel mitigation project will inevitably go down in history. We are at another point in time; there has been a vast shift in values; and this is a far cry from the creation of the Ecological Study Area. Of the three different public agencies submitting projects for this FEMA grant, it is UC Berkeley's which is most aggressive. I would have preferred if public agencies had promulgated less draconian measures before pursuing this approach in the name of public safety. I would feel safer if the East Bay Municipal Utility District were compelled to repair frozen fire hydrant valves in the residential areas surrounding the canyon lands. I would feel safer too if there were more fire trails to provide egress in the event of a catastrophe. I would like it if there was less construction at the urban-wildland interface and would prefer that UC Berkeley not build new housing in the Hill Campus given their stated concerns in the EIS about imminent catastrophe. And I would appreciate UC Berkeley leadership should it at long last actively address the problem of homeless campers who live in the woods.

In short, the EIS underestimates impacts to biological resources because it assumes improved conditions for native vegetation and native wildlife. The EIS underestimates water quality impacts by not adequately considering downstream users, by minimizing

the project location in the Strawberry Creek watershed, and by ignoring the implications of applying potent herbicide to 22,000 tree stumps in a steeply sloping canyon over a 10 year time period. Finally, the analysis in this EIS is insufficient because it underestimates the impact to climate change. Cutting down 22,000 trees in Strawberry Canyon will increase carbon dioxide.
http://www.scientificamerican.com/podcast/episode.cfm?id=can-trees-save-us-from-climate-chan-09-04-24

In closing, the EIS for the proposed project in Strawberry Canyon does not show that felling all of the 22,000 eucalyptus, acacia, and Monterey pines in a 56 acre area will make us any safer than other less radical alternatives, e.g. thinning trees and clearing understory. Other alternatives might be equivalent in costs if the proposed project would factor in the cost of proactively weeding the site, which is needed to help the natives compete with the invasive exotics. Without proactive selectively weeding, project outcomes cannot be guaranteed. I join those who ask UC Berkeley to revise their assumptions, retest their model, and come up with a viable analysis of outcomes that is not based on a plan that depends too heavily on the return of native plants.

Yours sincerely,

Janice Thomas

FEMA

May 31, 2013

It sickens and disheartens my family and me that you are even considering the removal of 85,000 trees from the East Bay hills. The previous removal of over 24,000 trees was very difficult to witness. The above project, if approved, will certainly devastate the area. There were serious regrets for the removal of trees on Angel Island. Won't anyone read the facts. There are grave consequences for the environment and wildlife. If you insist on leaving only oak trees that will only increase the spread of sudden oak death, then we will be left with nothing.

Pat Thompson, Dan Thompson

Pat and Dan Thompson

40 year residents of Montclair District

5757 Balboa Drive
Oakland, CA 94611

Task force report confirms trees are not a primary fire hazard

DAVID MALONEY
My Word

I RETIRED FROM the Oakland Fire Department in 1988. In 1989, I began working for the Department of Defense as chief of fire prevention at the Oakland Army Base. In 1991, I was appointed to the Oakland-Berkeley Mayors' Firestorm Task Force. Our job was to investigate the causes of the 1991 Hill's Fire and make recommendations to prevent its recurrence.

The conclusion of the Task Force Report was that the spread of the fire was mostly due to the radiant heat generated by burning houses. A burning house has a sustained radiant heat transmission of 2500 to 3000 degrees Fahrenheit. The spread of the fire was not due primarily to burning trees — whether eucalyptus or any other species.

The July 17 article ("Hills fire prevention not clear cut") failed to mention another crucial fact. There are two species of eucalyptus that predominate in the East Bay Hills: The blue gum, which is highly fire resistant, and the dwarf blue gum.

The two characteristics that determine the fire resistance of any tree are how high from the ground its branches begin and the thickness of the tree's bark. The blue gum has a very thick bark, which enables it to withstand fire, and its branches begin about 25 feet from the ground, which means a ground fire will blow past it without catching its leaves on fire. A beautiful example of the blue gum is the copse of trees on that part of the University of California campus that is close to Oxford Avenue.

The dwarf blue gum is different. It has a thick bark but its branches are low to the ground. A ground fire will transmit relatively easily to its leaves, thereby causing the tree to burn. Many native California trees, such as oak, also have branches low to the ground.

In the late 1990s, the federal government clear cut blue gum eucalyptus from Angel Island. The beautiful eucalyptus canopies, which provided shaded avenues for countless hikers and bikers, were replaced by grass, brush and shrubs.

In 2008, the worst fire in modern Angel Island history occurred. It consumed 400 of the island's 740 acres. It burned much of the grass, brush and shrubs that took the place of the clear cut eucalyptus, pouring smoke all over southern Marin County.

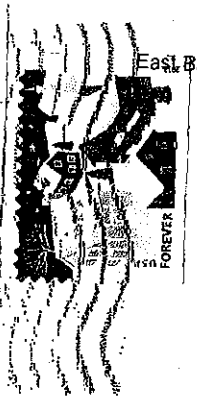
Blue gum eucalyptus is a dominate species. It precludes grass, brush and shrubs from growing around it. If the blue gum eucalyptus had not been cut down, the grass, brush and shrubs could not have survived, and the fire would not have been as extensive as it was.

My experience on the task force was that many people who wanted only native California plants and trees on our hillsides were seemingly deliberately ignoring the facts of the major cause of the fire, and the difference between the blue gum and dwarf blue gum.

The Hills Conservation Network is correct in its position of supporting thinning out the wooded areas of the East Bay Hills. It would be a waste of taxpayers' money to clear cut the East Bay Hills of trees that are highly fire resistant, and it could lead to another devastating fire.

Because of our conclusions, new fire prevention codes relative to housing construction were promulgated by the state and various cities throughout California. No new fire codes were promulgated relative to the species of trees that would populate the East Bay hills.

David Maloney now lives in San Francisco.



Pat and Dan Thompson
5757 Balboa Drive
Oakland, CA 94611

Tree Removal Project
P.O. Box 72379
Oakland, CA 94623-8579

ccnmontclarion@bayarea newsgroup.com

From: Tamara Thompson
To: EBH-EIS-FEMA-RIX
Subject: Draft EIR comment
Date: Monday, June 17, 2013 6:16:59 PM

Dear Sirs,

I am writing to comment on the Draft Environmental Impact Report for the FEMA-funded fire-reduction and native plant restoration project in the hills of the East Bay in the San Francisco Bay Area.

For the record, I generally agree with the concept of removing and thinning non-native eucalyptus to reduce fire danger in the East Bay hills, but what I see planned here is extensive clear cutting of an extreme magnitude. This is a massive number of trees (roughly half a million), and most areas are not actually slated for replanting; the assumption is that natives will naturally repopulate the areas after a number of years. The plan is not just to removing hundreds of thousands of eucalyptus, but all acacia and Monterey pines too, and this raises a variety of concerns, such as:

- Destroying the wind-break
- Destroying habitat for birds and mammals
- Converting living trees into dead fuel on the ground
- Releasing carbon emissions on a huge scale
- Reducing the amount of oxygen produced
- Reducing landscape moisture from fog drip during the summer
- Encouraging the growth of more-flammable plants

This proposal will also use thousands of gallons of toxic pesticides on steep hillsides where they can get into the watershed. This chemical application is my primary concern. When my dog Riley was diagnosed with fatal lymphoma in 2008, the very first question the vet asked me is whether I use Roundup in my yard. To think that thousands of gallons of it will be sprayed in areas that are frequented by people, dogs and horses is quite disturbing -- but the stump-killer Garlon is even worse. It causes cancer, kidney and liver damage and birth defects. It is toxic to ducks, fish and frogs, and because it persists in the environment for several months after application it is prone to contaminating water. Garlon's planned use in proximity to creeks and bodies of water such as Lake Chabot is of deep concern to me, as is the grazing and transit of deer, cows and other animals (including dogs) in and around treated areas. Additionally, according to the plan, repeated applications will be required to effectively kill stumps, so we will be looking at several years of treatments.

Cutting hundreds of thousands of trees all at once and poisoning the stumps may be the cheapest and easiest thing, but clear-cutting and chemicals are not the only answer here. A non-chemical alternative called the "cut and tarp" method is also effective to eradicate eucalyptus stumps, something I think should be duly investigated and properly considered.

This project is not only environmentally destructive, it is a waste of funds that should be used to actually reduce hazards, not increase them. I urge you to deny funding for this project. Selective thinning of the eucalyptus fuel load is essential, but we must be better environmental stewards than to exchange problem trees for problem chemicals and wide-scale habitat destruction.

Sincerely,

Tamara Thompson
8040 Winthrope St
Oakland, Ca 94605
(510) 562-7708
penandsword1@earthlink.net

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

Oakland, CA 94619

2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Damon Tighe

CONTACT INFO (optional):

COMMENTS:

I am happy to see efforts being made to protect against wildfires and remove invasive species, but I am concerned about the use of herbicides and the speed of the succession plan to natives plants. It seems we may be opening ourselves up to a higher possibility of soil slides + other non-natives that are much quicker at taking over disturbed lands (Scotch Brooms etc)

Laetiporus Gilbertsonii could be used insted of Roundup to Target Eucalyptus

Signature and Date: 5/18/2013

326_Tighe_Damon

From: Carolyn Tipton
To: EBH-EIS-FEMA-RIX
Subject: oppose clear-cutting
Date: Saturday, June 08, 2013 12:26:41 PM

Dear FEMA,

Please oppose petitions demanding the clear-cutting of trees in the East Bay Hills. I am a native of Berkeley. I am particularly concerned about Tilden Park, which I have enjoyed all my life. I go there at least 3 times a week. There are no residences in Tilden Park. People go there because of its trees, which provide beauty, oxygen, respite; we now live in a very crowded and dense urban area. People hike, picnic, walk their dogs in Tilden; they enjoy being up in the trees. The clear-cutting of trees would utterly destroy Tilden Park as we now know it--and the spraying of herbicide is the final insult: for years, we would be unable to enjoy our park--and this park is the only one of its kind; we all would have nowhere to go. You would be destroying a lovely park and leaving us with stumps, chips, and poison.

In addition to considering the people who actually live in this area and use the park, I think you should consider the disastrous consequences of clear-cuttinhg and poison-spraying on the environment. Think of what it will do to the animals and the birds, to the air we breathe, and to the water in Tilden's streams.

Why don't you consider a less drastic plan? Why don't you consider thinning a few trees, taking out undergrowth, having goats eat the dry grasses, etc.? There are other less drastic means to attain fire safety!

Please do not destroy our trees!

Sincerely,

Dr. Carolyn L. Tipton

As I've previously written [Letters, May 24], after first mixing the glyphosate pesticide with a chemical "surfactant" to increase its toxic effectiveness, MMWD plans to spray the mixture over and over again--onto our Marin watershed, the source of most of our drinking water. Their proposed maximum *annual* glyphosate use amounts to 750 lbs, the equivalent of *thousands of gallons* of the 2.5% dilution in which the common glyphosate product Roundup is typically sold.

What about primary manufacturer Monsanto's claim that glyphosate is safe? The majority of research supposedly demonstrating that has been far from independent--done by the corporation itself or those with financial ties to it. MMWD's scientific consultant acknowledged that "the toxicity of glyphosate when used in conjunction with different surfactants remains largely unexplored" and claimed that "no information is available on AMPA [glyphosate's primary breakdown product]'s carcinogenicity, reproductive and developmental toxicity, neurotoxicity, immunotoxicity or endocrine disrupting ability"--hardly a ringing safety endorsement. Actually, independent scientific studies have shown that carcinogenic formaldehyde *is* a breakdown product of AMPA.

Other independent research has demonstrated that glyphosate (and its breakdown products) can persist in heavy clay soils (typical of our watershed) for *many* months after spraying. Any unexpected rain can wash them down (above ground and below) toward our drinking water supply. And plants—once killed by glyphosate--preserve its poison in their dead roots, stems and leaves, from which it can be reactivated as this plant matter decays. How can this enormous volume of hazardous dead broom stalks be safely disposed of, post-spraying? (For safety's sake, they shouldn't be composted or burned.)

There are also numerous risks of other unintended consequences: The research of an emeritus professor of plant pathology found that glyphosate kills a great many soil microbes—so the surviving ones create a highly unbalanced soil ecology, causing pathogens to thrive that affect both plants and animals; this can make it virtually impossible for native plants to thrive, even in the unlikely event that the repetitive spraying ultimately eliminates the broom—so, forget about increasing plant biodiversity! And ecologists have warned that glyphosate's acknowledged toxicity to amphibians can lead to a proliferation of the mosquito larvae they normally eat, inadvertently increasing our exposure to mosquitoes carrying West Nile virus.

Besides its other dangerous attributes, recent independent research indicates that glyphosate is also an "endocrine disruptor", likely an even stronger one in mixtures with surfactants. Public health scientists have become very alarmed about human exposure to "endocrine disruptor" chemicals, including many pesticides. Even *extremely-tiny* amounts of these substances can make people, particularly fetuses and young children, vulnerable to dangerous consequences—including eventually developing hormone-related cancers, diabetes, attention deficit disorders, problems, thyroid disorders, damaged reproductive function (including fertility), even obesity. And they're also dangerous to other animal life.

My next letter will present viable alternatives to pesticide spraying.

From: VQL
To: EBH-EIS-FEMA-RIX
Subject: East BAy Hills Fire Hazards
Date: Friday, May 17, 2013 4:07:09 PM

Yes there is a hazard and yes Eucalyptus is especially hazardous and should be removed. No, Strawberry and Claremont Canyons should not be clearcut. Not only is the watershed destroyed and wildlife habitat destroyed but clear cutting will create an equally problematic hazard by destabilizing the soil.

I vote no on the clearcutting plan.
Victoria Q. Legg
293 Fairlawn
Berkeley, CA 94708

From: Pete Villasenor
To: EBH-EIS-FEMA-RIX
Subject: Tree removal UC Berkeley
Date: Sunday, June 16, 2013 3:25:22 PM

I DO NOT SUPPORT the removal of the trees. I also think it's dangerous and irresponsible to add the controversial herbicide Roundup to the ground afterwards.

Please do not go ahead with this action and instead explore alternative means of reducing the fire danger such as removing ground debris and low hanging branches.

Sincerely,

Pete A. Villasenor
Resident of San Francisco, CA
Full-time Oakland employee since 1996

Sent from my iPhone

RECEIVED
JUN 12 2013
BY:

To: FEMA IX (Hazardous Fire Risk Reduction East Bay Hills Projects)
FEMA, Region IX, P.O. Box 72379, Oakland, CA 94612-8579

From: Scott Wachenheim, Berkeley, California

re: Hazardous Fire Risk Reduction Projects, East Bay Hills

June 7, 2013

This letter submits needed revisions to the "Hazardous Fire Risk Reduction" Projects (East Bay Hills) applied for by UCB, the City of Oakland, and the EBRP (4/2013) . THE UNDERLYING PROBLEM is that canyon hillsides covered with flammable non-native vegetation, such as Eucalyptus and Monterey Pines, have been developed with narrow winding streets, closely built houses, and UCB structures that may lack defensible surrounding space. This is complicated by UCB's plans to continue to add buildings and facilities in Strawberry Canyon.

Fema states, "The projects would reduce the amount of vegetation available to fuel wildfires. **However, the projects need revision because they do not adequately address how defensible space and fuel zones could be utilized, both to preserve wildlife in open space areas and to help protect lives and property in built areas.**

Revision of UCB's projects in Strawberry Canyon, Claremont Canyon and Oakland's project in Frowning Ridge is needed to create fuel zone guidelines and procedures that define defensible space where agency lands border properties with built structures. For example, within 50 feet of a building or significant structure all fuels would be removed other than ornamental and food gardens (Zone 1). Removal would be timed around nesting and migration times of birds, newts, amphibians, reptiles, Western Pond Turtles, etc. Zone 2 would extend approximately 50-200 feet from buildings and significant structures. In this zone fuels would be reduced by thinning and pruning horizontally and vertically . All agency land greater than 200 feet from buildings would be managed as a gradual transition zone back to native plants (Zone 3). **These fuel zones have proven effective in all fire severity zones. (FEMA).**

Outside of the defensible zone , more than 200 feet from buildings, NON -NATIVE TREES IN SMALL AREAS (e.g.. 1 acre at a time) WOULD BE THINNED, PRUNED, or cut. Then the small areas would be replanted with natives including bunch grasses, annuals, live oak trees and redwoods, in appropriate habitats. The process would be timed to allow the native trees, plants and wildlife to re-establish and re- adapt to the changed environment. LOCAL JOBS would be created for ongoing maintenance over a five-ten year period, such as removing unwanted resprouts. This would replace the need for and **use of toxic herbicides** which would **not be permitted**. Maintenance workers would also care for the planted saplings of redwoods and oak trees. Local homeowners and UCB would be trained to maintain the defensible zones.

Compared with the proposed projects, this revision would avoid many potential problems by having no herbicide use, no prescribed burns; fewer displaced wildlife (including nesting raptors, owls); less impact on the UC Botanical gardens and pond, better quality hiking, biking, jogging, concerts, education programs, other public use, and less impact on the Strawberry Creek and Claremont Creek watersheds. Money saved by eliminating the vast clear -cutting would be used to pay the workers who will be restoring the native ecology. I urge you not to turn your back on this winning plan for every being.

Scott J Wachenheim

From: Lisa Wahl
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills tree cutting ok, Round-up not
Date: Monday, June 17, 2013 3:52:54 PM

I'm personally fine with a phased removal of non-native species. I don't agree with ten years of Roundup application. I agree that using the funds to employ people to do thoughtful thinning and pruning would be a better use of the money.

L. Wahl
Berkeley resident

From: walter@ratcliffconsultants.com
To: EBH-EIS-FEMA-RIX
Subject: Comments: Hazardous Fire Risk Reduction Environmental Impact Statement East Bay Hills, California April 2013
Date: Monday, May 20, 2013 12:25:23 PM

Gentlemen;
With regard to the plan for removing eucalyptus, Monterey pine and acacia trees from the Berkeley/Oakland Hills area, I would like to state my qualified support. This is a unique area that is close to cities, so precautions should exceed what the plan states. In particular, herbicides should be avoided except where physical alternatives are ineffective:

1. Substitute grazing and manual clearing for foliar application of herbicide. Use herbicides exclusively for killing tree stumps.
2. Increase the distance from herbicide use to watercourses from 60 to 120 feet.
3. Increase the no-pesticide use rule to 48 hours of a forecast rain event (or enough time to ensure degradation of the active ingredients).
4. Remove Monterey pine only when the tree is dangerous, dying or dead. These are slow-growing trees that provide forest cover while adding minimally to fire load.
5. Use the Oakland Creeks 50 foot buffer from watercourses in the Berkeley Hills area as well. Tracked equipment and skidders should be avoided in watercourses, even dry ones, because turbidity kills fish and amphibians. Residents have been trying to bring back fish and amphibians to urban creeks for years. FEMA shouldn't be working at cross-purposes.

In summary, litigation can be as costly as major fires. Litigation resulting from mass herbicide use close to urban areas is not a risk; it's guaranteed. Since litigation is a known consequence of this strategy, the budget should cover it explicitly. As a resident of the Oakland Hills and a taxpayer, I would far prefer that honest labor be substituted for litigation.

Sincerely,
Walter Ratcliff

Ratcliff Consultants, Inc.
510.658.0583 (office)
510.220.4525 (cell)

www.ratcliffconsultants.com

From: Joan Waranoff
To: EBH-EIS-FEMA-RIX
Subject: Strawberry Canyon and Claremont Canyon tree removal
Date: Saturday, May 18, 2013 11:55:31 AM

What provision is being made to protect birds and other wildlife in these areas - not just endangered species? For example, there are several nesting horned owls in the Claremont Canyon eucalyptus groves. Consider a phased approach ie gradual reduction of eucalyptus groves over time as native groves replace them, allowing transition of nesting from eucalyptus to native trees.

Joan Waranoff
165 Hillcrest Road
Berkeley CA 94705

From: Wendy Brubaker
To: EBH-EIS-FEMA-RIX
Subject: Do not cut trees
Date: Wednesday, May 22, 2013 8:00:14 PM

Trees are not the problem, people are. Create fire breaks, around houses and through groves, plant fire resistant trees around the periphery, improve early warning systems. Trees have far more benefits then dangers, we need them.

From: David Widelock
To: EBH-EIS-FEMA-RIX
Subject: comment on EIS
Date: Tuesday, June 04, 2013 6:14:26 PM

I have looked in vain for any reference to active revegetaton of native flora. It seems that the EIS assumes that native oaks and understory vegetation would repopulate the areas once they are cleared of Eucalyptus and other non-native trees and shrubs. Do you have evidence that this owuld occur, especially given deer browsing on young oaks and other vegetation.

David Widelock

--
David Widelock Landscape Design
CA RLA #3577
4685 Commonwealth Dr.
Oakland, CA 94605
510-638-8660
widelock@earthlink.net

From: Yonti Kristan Willits
To: EBH-EIS-FEMA-RIX
Subject: PLEASE DON"T
Date: Friday, May 17, 2013 9:50:42 AM

I am writing to STRONGLY oppose the plan to cut large areas of trees in the Berkeley hills, fill with wood chips and
spray with herbicide to prevent re-growth.

I oppose this for many reasons.

1. Trees are vital for keeping hillsides stable. Cutting increases the **danger of slides**, putting many homes/lives at risk. Those areas also support wildlife that is part of keeping our ecosystem functional.

2. The herbicides will endanger wildlife AND HUMANS by ending up in our water supplies and air, posing serious **health risks**.

3. Those areas are used regularly and well by citizens for recreation/fitness/enjoyment of nature.

4. There are certainly other ways to deal with the fire dangers we face.

5. This is being done with little media coverage and public input, which suggests that you already know that the public would oppose it if they knew about it. We do.

PLEASE DISCONTINUE THIS PLAN IMMEDIATELY.
Kristan Willits, M.A.
Berkeley Resident

Visual Art Offerings at
THE ART OF ENERGY - www.kristanwillits.com

Musical Offerings (free download) at
www.yontikristan.bandcamp.com

"May the beauty that we love be what we do. There are hundreds of ways to kneel and kiss the ground." -Rumi

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

Oakland, CA 94619

2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: CHARLENE WOODCOCK

CONTACT INFO (optional): charlene@woodcock.net

COMMENTS:

IT IS DEEPLY IRRESPONSIBLE TO REMOVE MATURE CARBON-SEQUESTERING TREES AND TO USE HUGE AMOUNTS OF TOXIC HERBICIDES, WHICH WILL POISON OUR SOIL, AIR + WATER AND KILL BENEFICIAL INSECTS, POLLINATORS + OTHER WILDLIFE OVER MANY ACRES

HORRIBLE

Signature and Date: Charlene M. Woodcock 5/18/13

344_Woodcock_Charlene

SAVE STRAWBERRY CANYON
P.O. BOX 1234
Berkeley, California 94701

Save Strawberry Canyon is a citizens' group that seeks to preserve and protect the watershed lands and cultural landscape of Strawberry Canyon. Save Strawberry Canyon was formed out of the urgent need to take action in response to the threat of intrusive, inappropriate development on the Canyon lands.

Strawberry Canyon watershed, opposite the Golden Gate, is a unique link to the East Bay Regional Park District lands and, by its streams and views, to San Francisco Bay. The canyons, with their streamside vegetation, oak-bay woodlands, grasslands, and surrounding slopes, form a rich repository of wildlife adjacent to the dense urban populations of the UC Berkeley Campus and the cities of Berkeley and Oakland.

Save Strawberry Canyon seeks to inform the public about the impacts of proposed developments, to encourage location of such developments at more suitable sites, and to promote better public access to the beautiful watershed lands with their wildlife and scenic resources. Mission Statement

Why has the EIS mentioned only the 1991 fire, which spread due to an inexperienced fire chief, bad coomunications, and incompatible equiipment? It was restarted in turf but in six minutes, had touched a house that exploded, not Eucalyptus!

Why has the Angel Island experience of fires only after the Eucalyptus removal not been closely studied? The 1988 preparatory study of 290 pp. Is much more detailed and specific than the 3000 pages of this EIS.The 1997 report from the Parks Department on the successful removal and return to native culture should be required reading, given the fires that occurred in 2004, 2005, and especially 2008, which burned over one-third of the island.

A few comments from the California State Parks *Focused Environmental Study: Restoration of Angel Island Natural Areas Affected by Eucalyptus (1988)..*
The purpose was to follow State Parks Policy "Exotic species capable of naturalizing in California…should be replaced." Contributors to the report were faculty members from UCBerkeley's departments of Forest and Resource Management, Wildlife Biology, Geology, and Landscape Architecture.

Eucalyptus groves had been planted in the 1870s, 1911, and 1927, mostly in grasslands. Change in micro-climate under Eucalyptus: light reduced by about 7% and wind velocity by 61%. Thus the understory remains cooler, and fires do not travel fast.

A detailed count of deer and their behavior, of bird species and how many preferred natives to eucalyptus, and of raptor nests, along with the advisory that no noise should be made during nesting season between Aug. 15 and Jan. 15. Why were only the endangered species discussed in the EIS? What about the enormous number of mammals that live in the canyons? What do you expect them to do?

In 1997 David Boyd of the California State Parks reported on Eucalyptus removal on Angel Island. The trees were removed with great care, some by helicopter, some using a feller buncher. ALL SLASH PILES WERE BURNED TO PREVENT FIRE. Still the fires came! Why does UCB think it wise to pile chips to a depth of 24"? Surely these would comprise a spontaneous combustion source!

"The short-term quality of the eucalyptus removal sites as natural areas will be determined by the level of management attention they are given." No management plan is cited in the EIS. Given the current neglect of Strawberry Canyon and the Fire Trail, we cannot hope for any removal of woody debris, only broadcast use of herbicides after which thistle and broom will move in. At the moment huge cats are pushing branches and trunks from trees over the banks,

trees cut to provide a wider fire trail but which will load the ground with flammable material. NO MANAGEMENT OF DUFF AND SLASH HAS BEEN DONE FOR YEARS IN STRAWBERRY CANYON.

UCB should follow the EBRP model: thin and manage, don't clear cut trees.

Georgia Wright, PhD

From: Zuber, Devin
To: EBH-EIS-FEMA-RIX
Cc: suzanne_s_zuber@yahoo.de
Subject: Commentary on the EIS Hazardous Fire Reduction Plan
Date: Monday, June 17, 2013 11:59:07 PM

Dear Representatives of FEMA --

My wife and I, and our two small children, are home-owners who live on Panoramic Hill in Berkeley -- surrounded on three sides by woodland canyon areas that will be potentially affected by the EIS Hazardous Fire Reduction plan, if implemented.

We applaud the attempts to reduce the fire-risk hazard through the removal of non-native plant species, such as Eucalyptus. However, we remain deeply concerned by the planned use of the herbicide Garlon 3-A (and/or Roundup) on remaining stumps to prevent re-sprouting.

As you are surely aware, there are a number of studies that have raised serious concerns about the long-term effects of glyphosate-based herbicides and their longevity in soil and food chains. Due to several reports that have shown strong links between limited-exposure to glyphosates and Parkinson's, infertility, and cancers (see the April study published recently in Entropy, for example), the EPA is currently reviewing if glyphosate use should be curtailed for health reasons. This decision is slated to come in 2015 -- two years after FEMA is to make a decision now regarding these plans.

After attending several of the public forums about the fire reduction plans and closely following the arguments, both pro and con, in local papers, over blogs, and across various email forums, we understand that alternatives to herbicides (such as plastic tarping and ongoing human maintenance) were deemed "too expensive" to be deemed feasible. We find this assessment completely unacceptable, as it puts cost-saving economics before the health and safety of our children.

Given what a number of studies are suggesting about glyphosate herbicides, how would you feel about your young children living in such close proximity to this kind of large-scale application?

We strongly urge FEMA to stipulate that the disbursement of federal monies to UCB, the City of Oakland, and EBRPD should be contingent on finding viable alternatives to this use of herbicides that are known to be potential carcinogens, and particularly harmful to young children.

Sincerely yours,

Devin and Suzanne Zuber

****
Dr. Devin Zuber, M.A., M.Phil.
Assistant Professor for American Studies,
Literature, and Swedenborgian Studies
Pacific School of Religion

Core Doctoral Faculty
PhD Program in Art and Religion
Graduate Theological Union at Berkeley
http://tinyurl.com/bwyw2o4

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fax: +1 (510) 849 8296
office: Holbrook 126
office hours: Mondays, 3:00-5:00 pm
****

From: Irenne Zwierlein
To: EBH-EIS-FEMA-RIX
Subject: East Bay Regional Hills
Date: Friday, May 03, 2013 1:12:52 PM

There are areas on the map that look to be near where we have either had artifacts or burials or both uncovered.Our recommendations on projects that are the least bit likely to uncover artifacts and or burials is that all crews be culturally trained in sensitivity and knowledge of potential finds. We also recommend they are given visual training on what some of the artifacts look like. We also recommend that if there is any ground disturbance in areas that have or are likely to hit something that the crews be accompanied by Experienced qualified California Archaeological monitors as well as Experienced qualified Native American monitors. Feel free to contact myself or Michelle Zimmer if you need further assistance in any project including this one.
michellezimmer66@gmail.com or irennezwierlein@gmail.com
Or by phone @ 650 851 7489 or 650 400 4806.

--
Irenne Zwierlein

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

June 17, 2013

Alessandro Amaglio
Regional Environmental Officer
FEMA Region IX
U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, California 94607-4052

Subject: Draft Environmental Impact Statement for the Hazardous Fire Risk Reduction Project; Alameda and Contra Costa, Counties, California. (CEQ# 20130114)

Dear Mr. Amaglio:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Hazardous Fire Risk Reduction Project, (Project); East Bay Hills, California. Our review is provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The EPA appreciates the Federal Emergency Management Agency's (FEMA) commitment to protect people and structures from hazardous fire risk in the East Bay Hills. The DEIS articulates well the difficult decisions involved in reducing wildfire risk. EPA recognizes the need to minimize threats to public safety from wildfire, and we support this goal. Based on our review of the proposed action alternative, we have rated the DEIS as *Environmental Concerns – Insufficient Information* (EC-2) (see enclosed "*Summary of Rating Definitions*"), due to our concerns regarding potential impacts to natural resources and herbicide use. Our detailed comments are attached.

We are concerned that some of the aspects of the project could result in degradation of natural resources and may not provide for natural regeneration. We also note that extensive use of herbicides is proposed for the project and much of the DEIS is devoted to descriptions of herbicide use and assessment of risks posed to human health and the environment from that use. In the attached detailed comments, we recommend providing additional information regarding

natural resource impacts and more information in the Final Environmental Impact Statement (FEIS) about the location, type, amount, and application method for herbicide use.
EPA appreciates the communication between our offices and the opportunity to review this DEIS. When the FEIS is released, please send one hard copy and 3 cd's to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or Munson.James@epa.gov.

Sincerely,

For

Kathleen Martyn Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures: Detailed Comments
Summary of the EPA Rating System

U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)'s DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR THE HAZARDOUS FIRE RISK REDUCTION PROJECT, (PROJECT); ALAMEDA & CONTRA COSTA, COUNTIES, CALIFORNIA. (CEQ# 20130114)

Impacts to Natural Resources

The document assumes that areas will naturally regenerate, once rid of non-native species. We are concerned that some of the aspects of the project could result in degradation of natural resources and may not provide for natural regeneration. Further, while the DEIS includes a discussion of climate change, it does not include a detailed discussion of the potential impacts of climate change on the Project area. Current research indicates that climate change could impact the amount, timing, and intensity of rain and storm events; increase the length and severity of the fire season; modify the rate and distribution of harmful timber insects and diseases; and aggravate already stressed water supplies. A significant change in the weather patterns could have important implications for management of the Project area.

Recommendations:

EPA recommends that the FEMA consider whether more aggressive restoration efforts may be necessary to return such areas back into a natural state. We also suggest that the FEMA consider whether the 24 inches of wood chips, (page: ES-13) would alter the natural regeneration process and possibly retard native species' ability to repopulate the area. It may be prudent or necessary to replant native saplings to promote habitat restoration and avoid erosion, especially in light of changing temperatures and precipitation rates associated with climate change.

We also encourage FEMA to provide information in the Final Environmental Impact Statement (FEIS) regarding the decommissioning of skid trails after the project objectives have been met. Decommissioning should include scarifying the surface to break up compacted soils, seeding with native vegetation, and blocking these areas from hydrologic runoff.

EPA encourages the FEMA to consider the potential direct and cumulative effects of climate change on the resources that would be affected by the Project, including groundwater resources, sensitive species and the ability of native species to repopulate the treated area, and describe how the grant applicants will adaptively manage affected resources.

Noxious Weeds

Page 3-27 identifies the noxious weed species such as poison oak as common within the project area and states that the weeds would be treated by spraying their leaves; however, little information is given regarding mitigation measures to reduce the spread of noxious weeds prior to cutting and spraying.

Recommendations:

Clean all off-road logging and construction equipment prior to entering the project area to remove dirt, plant parts and material that may carry weed seeds. Avoid the use of construction equipment in weed infested area as much as possible and monitor all weed treatments for effectiveness.

Use certified weed-free seeds and plants for re-vegetation and erosion control.

Herbicide Use

Application

Appendix F and Appendix L present summaries of chemical characteristics for the herbicides being considered for use in the project areas: Garlon products, Stalker, and Roundup; however, the document does not identify the type of Roundup nor clearly identify which herbicides would be used where and on what plants or when they would be used. Also, triclopyr BEE (Garlon 4 Ultra) and triclopyr TEA (Garlon 3) have very different physical characteristics. Consequently, each needs an environmental fate assessment. For example TEA is very water soluble and has a low octanol/water partition coefficient (K_{ow}). BEE has low water solubility (although the DEIS incorrectly states that it is highly water soluble) and high K_{ow} Page 5.4-9 states "herbicide applications would be rotated for best impact during the growing season;" however, it does not describe specifically what would be rotated or how, or how decisions will be made in the field.

Recommendations:

The FEIS should state which herbicides (including which type of Roundup) will be applied to which plant species and identify which areas the herbicides will be used in. Clarify planned application rates of herbicides and explain how these will be adjusted as needed.

Discussions of fate and effects should clearly distinguish between active ingredients and formulated products[1] and the environmental fate of both triclopyr BEE and triclopyr TEA should be disclosed.

The FEIS should clearly state when species of concern reproduce and raise their young, and commit to not using herbicides during these seasons.

Water Quality

[1] For example, page L-5 states; "Garlon® 4 is reported to have low to moderate potential for bioaccumulation (Marin Municipal Water District 2008) based on the reported log K_{ow} (about 4).[1]" The bioaccumulation potential and log K_{ow} are for the active ingredient (triclopyr), not the formulated product.

Page 5.1-9 states; "foliar application of herbicides would not be allowed within a 60-foot buffer zone adjacent to ephemeral or permanent surface water bodies." From the document it is unclear what type of application method would be used to ensure protection of the proposed 60-foot buffer. Furthermore; page F-8 talks about the mixing of the herbicides that would take place but does not clearly state where mixing and storage of herbicides will take place or what measures would be taken should a spill occur.

Recommendations:

The FEIS should be clear that foliar applications will be done with backpack sprayers not aerial applications or other type of equipment that could result in more drift.

The FEIS should state that mixing and storage of herbicides will occur only outside of the proposed 60-foot buffer.

The FEIS should state if and where pesticides will be stored within the project area. \

Impacts to Species of Concern

Appendix Section 7.2, "Ecological Risk", states that it is "assumed that protection of the five listed species provides adequate protection of other less sensitive species. This assumption is based on the expectation that these five species are sufficiently sensitive to the proposed herbicides to serve as surrogates for other less sensitive but closely related species." However, listed species are not necessarily the most sensitive to herbicides. The risk assessment needs to be based on data for the most sensitive species available, which may or may not be the listed species.

Recommendations:

The FEIS should use toxicity data for the most sensitive species for which reliable data are available to ensure appropriate protections are in place and should be updated to include a discussion of chronic or sub-lethal effects.

EPA has completed a Pacific Salmon and Steelhead species risk assessment for triclopyr BEE (including one specifically for forestry use) and glyphosate. These documents should be part of this literature discussion. For more information go to: www.epa.gov/espp/litstatus/effects/index.htm

Page F-107 states that surveys should be conducted prior to herbicide application to identify all individual plants present in potential treatment areas, to the extent possible. This includes the pallid Manzanita. The DEIS states that buffer zones should be of sufficient size to ensure manzanita plants are protected from spraying and spraying drift; however, the root zones also need protection from triclopyr and imazapyr, which can migrate through soil.

Recommendation:

The FEIS should be expanded to reflect that herbicides triclopyr and imazapyr can migrate through soil with water.

Herbicide application should be avoided in root zones for both the pallid Manzanita and the Presidio clarkia.

Page F-12 of Appendix F states that "separate evaluation of risk to these species was conducted. Species of concern include California red-legged frog (CRLF)"; however, this section could benefit from incorporation of the EPA CRLF assessment.

Recommendation:

The FEIS should incorporate the EPA's California Red-Legged Frog risk assessments for the chemicals proposed for the project. Those documents should be part of this literature discussion. These assessments can be found at:
www.epa.gov/espp/litstatus/effects/redleg-frog/index.html

Human Health and Safety and Exposure to Contaminated Vegetation

Toxicology Assessment

Table 4-1 of Appendix F lists toxicity categories as: Category I Highly Toxic to Eyes, and Category IV for skin, practically non-toxic. Table 4-1 also depicts Roundup as irritating to upper respiratory tract, but no Toxicity Category is noted. In addition, EPA questions inclusion of a cancer discussion in Section in 4 of the DEIS when page F-77 states, "None of the herbicides proposed for use in this project were identified as carcinogens." EPA agrees that the herbicides proposed for the project are not carcinogens.

Recommendations:

The FEIS should include a toxicity category for glyphosate due to upper respiratory irritation.

The FEIS should be modified to eliminate any confusion and state that there is no cancer risk from herbicides proposed for use in connection with this project.

Page 5.10-7, discusses four parts of a human exposure pathway. One of the parts says, "A transport mechanism for movement of chemicals to a point of human contact…." and we note there is a potential for human contact even if the chemical does not move after application). Page F-50 goes on to state that "for workers, general exposure involves handling and application of herbicide",yet little is said about other non-applicator workers in the project area that could come into contact with the applied herbicides after the fact. Further, Section 3.2.2.1 states that "residents could also be exposed to herbicides directly during application and indirectly after

application if herbicides migrate from the original application area." Yet the document does not sufficiently address the possibility of people and or animals entering the treated area and coming in contact with herbicides already applied. Page 5.10-11 states that the risk to the general public from exposure to herbicides would be reduced by limiting access to treated areas such as. "slashing of fruit bearing species prior to herbicide application (Appendix F)" as a way to reduce exposure; however, it's unclear if this will be done as part of the project.

Recommendations:

The FEIS should describe what type of exposure could occur should people and or animals come in contact with previously applied herbicides in the treatment areas and should clarify that there is potential for human exposure even if the chemicals do not move from the application site.

The FEIS should be expanded to include all workers in the project area such as those conducting timber removal and other fuel reduction activities and should clearly state if workers are also covered in the "Maximum Exposed Individual," (page: 5.10-7) scenario.

The FEIS should include a mitigation measure to remove fruiting or other edible vegetation.

Induced Growth

Section "4.13 Land Use and Planning" lists the grant applicants' broad-spectrum land use plans. It appears that some of the infrastructure development projects may overlap with areas planned for tree removal, such as "faculty housing, campus retreat center, recreational use and mixed-use development in the southern shoreline area". Given that development is not included in the purpose and need for this Project, it is unclear whether the trees in these overlap areas would be removed for construction purposes regardless of whether they are removed as part of the proposed Project or not. If the development would not occur if not for the groves being removed, then the development should be evaluated as induced growth impacts of the proposed Project.

Recommendation:

The FEIS should describe the reasonably foreseeable future land use and clarify the relationship between the proposed action and the future development activities. The document should provide an estimate of the extent of development, likely location, and the biological and environmental resources that would be affected if the proposed vegetation removal is inducing additional development.

Herbicide Labeling Clarification and Minor Edits and Clarifications

EPA provides the following additional recommended clarifications and minor edits to the document.

Labeling Requirements

The table on page F-79 implies that instructions on the herbicide labels are considered mitigation practices for this project. However, following the label is a requirement for use of the product. If personal protection equipment (PPE) requirements are on the label, they must also be followed. Actions taken to further reduce risk from exposure should only be considered mitigation if they are above and beyond the printed label on the herbicide.

Recommendations:

The FEIS should state that herbicides will be used according to product labels and should ensure that numbers and rates of annual applications allowed by herbicide labels will not be exceeded.

The FEIS should clearly state that "unmitigated", for this project, means following the label with no further measures taken to reduce or offset impacts.

If "without mitigation, (Table 5-1.)" means not following the label, then this should be removed from the document and not considered as a viable practice for the federal action.

Page F-80 incorrectly states that Best Management Practices (BMPs) "to be implemented include use of appropriate PPE and requirements for specific safety training for all applicators."

Recommendation:

The FEIS should clearly state that use of PPE is not a BMP; rather PPE is a requirement on the printed herbicide label.

Page F-10 of Appendix F on General BMPs states: "to prevent drift – wind must be less than 3 to 5 mph" while Ecological BMPs on the same page states "Apply on windless days to reduce drift". Furthermore, Section 3 of the DEIS on page 3-28 states "No spraying of foliage would occur within 60 feet of standing or flowing water or when wind speed is greater than 10 mph or less than 2 mph.." Appendix L includes the BMP "apply on windless days, (page: L-6)." That is inconsistent with other guidance about not applying if wind speed is "less than 2 mph", stated on page: F-8.

Recommendation:

Wind speeds for application of herbicides should be consistent throughout the FEIS and the FEIS should be modified to ensure that Appendices F and L are consistent.

(Page F-96) states: "a No-Observed Adverse-Effect Level (NOAEL) is often estimated from an experimentally derived Lowest Observed Adverse Effect Levels or (LOAELs), by applying a factor of ten to the LOAEL (NOAEL =LOAEL/10). Similarly, a LOAEL can be estimated from an experimentally derived NOAEL, often using the same factor of ten (LOAEL = NOAEL * 10)." No reference is given for this approach for aquatic species.

Recommendation:

The FEIS should provide a reference to support using this approach for estimating LOAEL from NOAEL (and vice versa) for aquatic species.

Page 5.4-8 states that "stump application of all herbicides (e.g., Garlon 4 Ultra, Roundup, Stalker, or Garlon 3A) would be conducted by a State of California Qualified Applicator or by staff under their supervision." The title "Certified Pesticide Applicator" is used on page 4.5-19. The inconsistency in terminology should be changed because they come with different authorities. "California Qualified Applicator" is the correct terminology. "Certified Pesticide Applicator" is reserved for those licensed to use Restricted Use Pesticides (RUP, per EPA) or Restricted Materials (per CA). None of the pesticides proposed for use in this project is an RUP.

Recommendation:

Terminology should be consistent throughout the FEIS using the title California Qualified Applicator.

Page F-15 states, "In this report the term pesticide can refer to both pesticides and herbicides. Current use of pesticides and herbicides by sub-applicants is limited and chemicals are used only as a backup to other control methods in most areas." Pesticides are all of the "-icides": insecticides, herbicides, rodenticides, etc. It's unclear what "pesticides" means here because there is no need to say "pesticides and herbicides."

Recommendation:

Revise wording in the FEIS to specify if only herbicides are used. If other "-icides" (e.g., insecticides) are planned for the project than this should be stated in the FEIS.

Table 2-1 summarizes the proposed herbicide applications for implementation of the proposed and connected actions by project area. The table shows that the adjuvant, Hasten, planned to be used in many of the project areas, yet little description is given regarding how it affects behavior of the herbicides in the environment, and any potential environmental or human health concerns from the adjuvant itself.

Recommendation:

The FEIS should describe Hasten and any potential environmental and or human health concerns from its use.

Page F-65 states that "a post-marketing risk assessment takes place during the use of pesticides and aims at assessing the risk for exposed operators. Results of these risk assessments are the bases for the health surveillance of exposed workers." It is not clear what "post-marketing risk assessments" is referring to. There is no routine post-marketing risk assessment work done by EPA after a pesticide is registered, nor is there routine worker health surveillance.

Recommendations:

The FEIS should provide a reference for this statement and clarify what risk assessments and surveillance this refers to.

Page F-72 states "EPA (IRIS 2012) determined a reference dose (RfD) of 0.1 mg/kg/day for glyphosate based on a 3-generation rat reproduction study." However, the IRIS is out of date for glyphosate. Results of this study are described as "spurious" in EPA's Re-registration Eligibility Decision and in Registration Review documents. The RfD of 2 mg/kg/day, which was selected for the EIS, did not come from this rat study. The 2mg/kg/day value comes from a rabbit developmental toxicity study not a rat study.

Recommendations:

Remove the in accurate IRIS reference and include the correct rabbit reference.

Table 4-2 (Page F-74 - F-76) is very hard to interpret. EPA suggests that the table should be modified to reflect the data more clearly and in some cases with updated information.

Recommendations:

The FEIS should specify if the amphibian toxicity values are expressed as concentrations in water. The table should also reflect how "safe level" was determined and if this "safe level" is for all stages of species development or just fully developed adults.

The FEIS should confirm whether or not the toxicity values for glyphosate selected for the EIS mesh with 2008 EPA CRLF assessment.
http://www.epa.gov/oppfead1/endanger/litstatus/effects/redleg-frog/glyphosate/determination.pdf

Submitted for the EIS hearings by FEMA – May 14, 18, 2013 – by the Claremont Canyon Conservancy.

L T Wallace,
President of the CCC

L. Tim Wallace, President
Claremont Canyon Conservancy

Jonathan Ball, Esq.
BALL LAW CORPORATION
One Market
Spear Tower, 36th Floor
San Francisco, CA 94105

May 18, 2013

Re: Cost Analysis of Proposed HCN Settlement

Dear Jonathan:

I am writing you at your request to estimate, conservatively, the cost difference between what the Parks field staff might find in carrying out the demands made by HCN from those if the original 2010 Parks Plan guidelines were followed. The HCN demands affect approximately 75 acres, leaving some 1,200 acres still to be managed by the Parks under the 2010 Plan guidelines.

I have been in agriculture all my life, first as a rancher and logger (felling and bucking for a portable mill), and have been involved with forestry all my adult life. My formal training is in economics (Harvard, Oregon State University and Purdue), and I have served as an Extension Economist at UCBerkeley from 1963-97, with leaves to work on the President's Council of Economic Advisors as senior economist for agriculture (1968-69), and as Director of California's Department of Food and Agriculture (1975-76).

The assumptions by which I did this estimate are only in 2011 dollars since the study is for purposes of establishing the relative difference between acreage guided by the proposed Parks/HCN agreement and what the Parks would normally consider adequate treatment - to which we agreed under the 2010 Plan. Data were drawn from actual cost accounting on eucalyptus cutting/maintaining projects within the last five years, and from talks with contractors who have done similar work on projects within that same time period.

Let's begin with the estimated costs of handling the 75 acres under "normal" Parks efforts re their 2010 Plan. Starting with the initial treatment of cutting eucalyptus, the cost data were taken from actual costs on UC grounds, similar and adjacent to euc-covered Park acreage. The average cost is $6,000 per acre. Annual maintenance (pulling volunteer plants, etc.) would be approximately $100 per acre per year, for a total of $2,000 per acre for the term of the 20-year proposed agreement with HCN. This amounts to a total of $8,000 per acre for the

20-year period. The total for 2010 Plan treatment would thus be some $600,000 for all 75 acres over the 20-year period.

Looking now toward accommodating the HCN/Parks settlement guidelines, the land would initially have to be cleared of the downfall that has accumulated since the 1991 fire. Downfall of strip bark, fallen branches, brush growth and dense stands of poison oak would require, for each acre, a 4-person team (contractor's price of $60 per person per hour which includes benefits, workman's compensation insurance, portal to portal travel time etc.), and a hauling vehicle (dump truck costing $45/hour) for one week of 8-hour days. Those costs add up to $11,400 per acre. For 75 acres that total is $855,000.

To maintain those 75 acres, assuming an annual downfall of 3-6 tons per acre per year (taken from both California and Australian data sources), it would require that same 4-person team and vehicle two days every five years. This amounts to $4,560 every five years for each of the 75 acres. Four clean-up trips are assumed desirable to keep up with the 15-30 tons dropped during each 5 year period of the 20-year period covered by the proposed agreement. Clean-up costs for the full 20-year period would amount to $18,240 per acre, or a total of $1,368,000 for all 75 acres.

The total for the HCN agreed-to guidelines would be $855,000 for the initial clearing plus $1,368,000 for the recurring clean-ups - for a total cost of $2,223,000. On a per-acre cost comparison, the difference is $21,640 per acre: $8,000 per acre under the 2010 Plan guidelines versus $29,640 per acre under the proposed settlement.

The total difference between the "normal" 2010 Plan guidelines and the HCN preferred guidelines for the 75 acres involved is thus $1,623,000 - a public cost increase which is not only unnecessary, but also counter-productive. It is needlessly spent on complying with a proposed agreement which wastes taxpayer dollars, increases fire risk, harms with habitat, and isolates a small group of eight people for special treatment in the management of a public park. Further, this cost is locked into perpetuity. Not "fair".

Sincerely,

L Tim Wallace

L. Tim Wallace

Analysis of Costs of Proposed Settlement vs. Costs of 2010 Plan

	2010 Plan	Proposed Settlement	Additional Cost Due to Settlement
Initial Treatment Per Acre	$6,000	$11,400	$5,400
Initial Treatment For All 75 Affected Acres	$450,000	$855,000	$405,000
Recurring Maintenance Per Acre For 20 Years in 2011 Dollars	$2,000	$18,240	$16,320
Recurring Maintenance For All 75 Affected Acres For 20 Years in 2011 Dollars	$150,000	$1,368,000	$1,178,000
TOTAL: Initial Treatment plus Recurring Maintenance For All 75 Acres For 20 Years in 2011 Dollars	$600,000	$2,223,000	**$1,623,000**

From the Claremont Canyon Conservancy Newsletter Fall of 2011-12.
LTW

The Eucalyptus and Pine Fire Hazard

In the early 1900s, blue gum and red gum eucalyptus were planted as random timber plantations in the East Bay Hills on private water company lands, with about 2,500 acres of groves remaining today under a variety of ownerships. The selection of these two trees for timber harvest turned out to be a major forestry and financial mistake leaving groves largely unmaintained over the past 100-years. Pine trees were planted by developers for residential projects, and by early park administrations to create forests on what were then viewed as "bare" hillsides. Eucalyptus and pine groves are now distinct features in the 20,000-acre mosaic of trees, shrubs, and grasslands covering undeveloped areas in the hills today.

Newspaper clips and old fire planning studies document an active and dangerous fire history in the hills, often describing the dramatic fire behavior in eucalyptus and pine groves. The recent Park District fire hazard reduction plan identified 1,500 acres of vegetation near homes that require ongoing management for fuelbreaks, and 1,000 acres of eucalyptus and 300 acres of pine requiring aggressive management in some locations and conversion to other safer plant communities on high ridges and slopes above homes.

Eucalyptus and pine forests were specifically identified as fire hazards because they are among the most flammable forests in the world when located in dry settings that are exposed to seasonal foehn-type winds. Local fire fighters would not be qualified or equipped to handle a wind driven eucalyptus of pine forest fire in our steep hills with few safe locations available for attempting to stop a fast moving fire in heavy fuels.

Any fall Diablo wind driven fire that reaches a dense eucalyptus or pine grove will quickly involve a lot of acreage with heavy fuel that is going to be alight at once and burn for a long time. This will create a monster convection column that will elevate everything including branches into the fire column with flames reaching 60 to 100 feet above treetops. The long ribbons of bark hanging off eucalyptus trunks, shaped like a box kite in cross section, get ignited, elevated in the convection column, transported long distances in the wind, and are still burning when they drop to earth later – still with active flames and fire brands and enough mass to ignite vegetation and rooftops where ever they land.

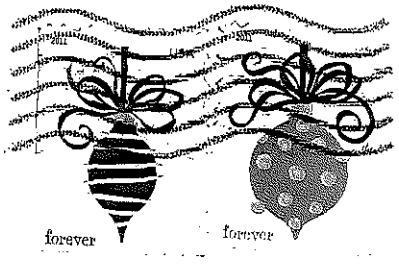
Blue gum eucalyptus and Monterey pine trees are forest trees that grow above 100 feet in height, and are characteristically found in the hills as unmaintained, dense, flammable groves. Fire hazard reduction plans recommend that these two forest trees in groves should not be retained on ridgetops or leeward slopes above homes. Diablo winds would likely fan any ground fire into tree crowns, even in thinned groves, creating the type of fire that would be impossible to control, throwing burning fire-brands and embers into vegetation on lower slopes, into unprepared residential areas igniting homes, and significantly reducing evacuation time for residents.

Some have advocated thinning and grove cleanup as a local solution for eucalyptus groves. However, expecting regular cleanup (every 3 to 5 years) of leaves, twigs and ribbon bark along with regular clearing of shrubs, seedlings, and other vegetation under 1,000 acres of eucalyptus or even 300 acres of pine is not a simple or even remotely conceivable task on our very steep hillsides. Today some groves contain up to 50 tons of flammable vegetation and ground litter with an annual renewal rate of about nine tons per year that would need to be cleared. It would not be realistic to expect Berkeley, Oakland, UC, or even the Park District to be able to fund annual cleanup for the next 100-years, even if it was humanly possible, under all eucalyptus and pine forests. Therefore, the Conservancy has advocated conversion of eucalyptus and pine forests in Claremont and Strawberry Canyons, that are on high ridges and leeward slopes above homes, to native woodlands or other native vegetation.

In Australia, the only significant fire hazard reduction program widely used is to burn natural eucalyptus forests on a five or ten year cycle. This is a controversial program even in many park and suburban areas, and not used successfully near urban areas. Australia has been burning their forests for the past 80-years, yet the major fires still occur in their flammable eucalyptus bushlands with devastating results.

L. T. Wallace
64 Oak Ridge Rd.
Berkeley, CA 94705

OAKLAND CA 945
15 MAY 2003 PM 3 L



EBH-EIS
P.O. Box 72379
Oakland
CA
94612-8579

From: elnaadams
To: EBH-EIS-FEMA-RIX
Subject: Razing the parks in Oakland California
Date: Saturday, June 15, 2013 11:45:45 AM

FEMA,
Please reject the UCB, EBRPD, and City of Oakland's application for $5.9 million in tax money to raze and poison East Bay forests.
I have heard no argument in favor of this action and cannot even imagine the reasons for the request. If fire safety is the main reason, there are many ways to manage that. If bringing back native trees is part of the plan it seems to me that could be manages in incremental steps. To ruin an existing ecosystem, destroying the habitats of countless flora and fauna in a time of climate change makes no sense
How can the City of Oakland be even considering doing untold damage to one of its crown jewels - our tree covered hills. Those trees are the reason that many of us live here. I bought my home 43 years ago because of the trees, the sense of being in the woods yet close to the city. Denuding the hills and poisoning the hillsides will do irreparable damage to our quality of life, health, safety and the financial stability of many business owners.

Why, if FEMA is taking public testimony, have we, the residents of the area, heard nothing about it? Do we not have a voice? We live here and treasure our forests and our parks. Save them!

Elna Adams
Oakland CA

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

Oakland, CA 94619

2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Dr. Robert SIEBEN

CONTACT INFO (optional): rlsieben@yahoo.com

COMMENTS:

It's been 8 years since this FEMA grant was first "granted." The small road opposition group has done everything they can to block this worthwhile, needed, crucial project. Please proceed.

Chair, Advisory committee to WPAD
" North Hills Community Assoc.
" Fire Prevention, Hillen Highlands V HOA since 1998

Signature and Date: R Sieben 5/14/13

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

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5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Ken Benson

CONTACT INFO (optional): kenbenson@earthlink.net

COMMENTS:

As a long term Oakland Hills resident I wholeheartedly support the fuel load and fire management strategies as laid out in the EIS. Dealing with our aging Monterey Pines and Eucalyptus trees is vital to reducing the spread of fire in the East Bay Hills.

Signature and Date: Kenneth M Benson 5/14/13

402_Benson_Ken

FEMA

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

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5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Peter Scott

CONTACT INFO (optional):

COMMENTS:

response to EIS

Signature and Date: P. Scott

403_Scott_Peter

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

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Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Tina Wallace

CONTACT INFO (optional): twallace@berkeley.edu

COMMENTS:

Represent the Claremont Canyon Conservancy. We're 500 families strong. We're in full support of the EIS - and all it's hard effort.

Why? Reduce fire, reduce public costs/taxes, increase native vegetation.

Signature and Date: L T Wallace 5/14/13

404_Wallace_Tina

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

Tuesday, May 14, 2013

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Saturday, May 18, 2013

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5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Dan Grassetti

CONTACT INFO (optional):

COMMENTS:
overview of this project

Signature and Date: Dan Grassetti 5/17/13

405_Grassetti_Dan

FEMA

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

Oakland, CA 94619

2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Madeline Hovland

CONTACT INFO (optional):

COMMENTS:

My personal observations after the 1991 fire — as a fire survivor. Everything burned, not just non-native vegetation. Flame lengths of various species indicate that chaparral grasslands burn longer flame lengths than trees

Signature and Date: Madeline Hovland 5/14/2013

406_Hovland_Madeline

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

NAME: Madeline Hovland

CONTACT INFO (optional):

COMMENTS:

Importance of Trees for carbon dioxide absorption & storage. Recent articles in NY Times & Civil Engineering Magazine warn of the dangers of cutting down tall trees

Signature and Date: Madeline Hovland 5/14/2013

407_Hovland_Madeline

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Mary McAllister

CONTACT INFO (optional):

COMMENTS:

These projects should not be funded by FEMA unless they are changed significantly because they will increase not decrease fire hazard

Signature and Date: Mary McAllister 5/14/13

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408_McAllister_Mary

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10:00AM—Noon

NAME: Bev Von Dohre

CONTACT INFO (optional): SLAKEWINGS @ AOL.COM

COMMENTS:

I want to talk in defense of the trees & how they prevent fire spread.

Signature and Date: Bev Von Dohre

409_VonDohre_Bev

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10:00AM—Noon

NAME: Jerry Baer

CONTACT INFO (optional):

COMMENTS:

EIS Deficiencies

Signature and Date:

410_Baer_Jerry

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

NAME: MATT CAMPBELL

CONTACT INFO (optional): BERKELEY, CA

COMMENTS:

THE PROPOSED PROJECT GIVES INADEQUATE CONSIDERATION TO THE RECREATIONAL LOSS FROM THE CLEAR-CUTTING OF THE FOREST. THERE HAS BEEN INADEQUATE COMMUNICATION TO THE GENERAL PUBLIC

Signature and Date: MAY 14TH 2013

411_Campbell_Matt

FEMA

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10:00AM—Noon

NAME: KEITH MCALLISTER

CONTACT INFO (optional):

COMMENTS:

RE: "NATIVE PLANT RECRUITMENT"

Signature and Date: 5/14/13

413_McAllister_Keith

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

NAME: STEVE KEMP

CONTACT INFO (optional):

COMMENTS:

GENERAL

Signature and Date:

415_Kemp_Steve

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

NAME: Sue Piper

CONTACT INFO (optional): Susanpiper@gmail.com

COMMENTS:

Support EIS - it provides the best proactive tools that the Wildfire Prevention District needs to address the vast aging forest. We need to move forward with major projects to get beyond just focusing on annual maintenance to reduce the risk for another major wildfire.

Signature and Date: Susan Piper 5/18/13

416_Piper_Sue

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10:00AM—Noon

NAME: Marge Gibson Haskell

CONTACT INFO (optional): mfgibson@pacbell.net

COMMENTS: Oakland (District 1)
I was the Councilmember ~~at~~ for the fire area at the time of the fire. This proposal should have been enacted after the fire but people were too concerned then with just getting their lives together. It is really just long deferred maintenance.

Signature and Date: 5/18/13

419_Gibson Haskell_Marge

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Rainbow Schwartz

CONTACT INFO (optional): _____

COMMENTS:

Signature and Date:

422_Schwartz, Rainbow

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FEMA

NAME: Jeff Nuyler

CONTACT INFO (optional):

COMMENTS: ORAL

Signature and Date:

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423_Nuyler_Jeff

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10:00AM—Noon

NAME: Varya Fedorova

CONTACT INFO (optional):

COMMENTS:

Should reduce fuel load everywhere
Herbicide creates dead zone & releases
nitrogen into atmosphere
Funding for cutting can go
to more sustainable management
options
Eucalyptus is one of highest carbon
sequestering trees

Signature and Date:

424_Fedorova_Varya

FEMA

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Sheila Schwartzburg

CONTACT INFO (optional): sheilaschwa@gmail.com
510-882-1606

COMMENTS:

Signature and Date: Sheila Schwartzburg 5/18/13

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10:00AM—Noon

NAME: DAVID WILLIAMS

CONTACT INFO (optional): 510 495.7670

NON-SPEAKER

COMMENTS:

I HOPE ALL PARTIES IN THIS DECISION LOOK AT THIS CRITICALLY. PLEASE CONSIDER THE LONG TERM IMPACTS OF CLEAR CUTS, PESTICIDE USE ON ALL THE INHABITANTS OF THESE AREAS, HUMAN AND NON-HUMAN. DON'T LET MONEY MOTIVATED INTERESTS CONTROL THE OUTCOME OF YOUR DECISION.

Signature and Date: 05/18/13

426_Williams_David

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

NAME: Will Goday

CONTACT INFO (optional):

COMMENTS:

Signature and Date: 5/18/13

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10:00AM—Noon

427_Goday_Will

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FEMA

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Raleigh Latham

CONTACT INFO (optional): 925-330-0846

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10:00AM—Noon

COMMENTS:

The fact that this hearing is so under the radar makes it extremely nefarious. The fact that thousands of gallons of herbicides will be dumped over ~~clear~~ hundreds of acres is reason enough to say NO. This is a dangerous project that will leave a nasty scar in our face

Signature and Date: 05/18/13

428_Latham_Raleigh

FEMA

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

NAME: Doris Nassiry

CONTACT INFO (optional):

COMMENTS: I strongly agree with the Claremont Conservancy — get rid of the eucalyptus trees please!

Signature and Date: Doris Nassiry

429_Nassiry_Doris

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

NAME: Dan Stern

CONTACT INFO (optional): 510-379-8392

COMMENTS:

I am against the proposed fire mitigation plan.

Signature and Date: 5-18-13

430_Stern_Dan

FEMA

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: DON KINKEAD

CONTACT INFO (optional):

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10:00AM—Noon

COMMENTS:

CLEAR CUTTING IS NOT VEGETATION MANAGEMENT, IT IS ENVIRONMENTAL DESTRUCTION.
FIND METHODS TO SAFELY PRESERVE THE EAST BAY HILLS FORESTS.

Signature and Date: 5/18/13

431_Kinkead_Don

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

NAME: JO ANN GIONGI

CONTACT INFO (optional):

COMMENTS:

I object to the clear-cutting of non-native species/plants at UCB, Oakland, and EBRPD. The EIS offers no less drastic alternative means to reduce fire hazards in this area. Drastic clear-cutting devastates animal habitats and interrupts the rightful public access to the beautiful environment that we share.

Signature and Date:

Jo Ann Gong May 18, 2013

432_Gong_JoAnn

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

NAME: GEN FUJIOKA

CONTACT INFO (optional): genfuj@gmail.com

COMMENTS:

I object to the project and the inadequacy of the EIS. The approach to eradication of all non native trees is overkill & unjustified. Yet the absence of less drastic alternatives considered in the EIS makes the decisionmaking process flawed. The public deserves a more all rounded consideration of options.

Signature and Date: 5/18/13

433_Fujioka_Gen

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5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: ANDREW NIMMO

CONTACT INFO (optional): ANDR NIMM@FASTMAIL.FM

COMMENTS:

PLAN YES BUT JUST REPLANT!

Signature and Date:

434_Nimmo_Andrew

Hazardous Fire Risk Reduction , East Bay Hills, California

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NAME: Jess Maron

CONTACT INFO (optional):

COMMENTS:

I am a supporter of life, however I understand the need to prevent wild fires. I do not support the use of chemical pesticides / herbicides. Mass. and OR. both have done extensive studies with alternatives. Isn't the Bay Area a leader that the rest of the country looks to? What studies →

Signature and Date: 5/18/13

435_Maron_Jess

Hazardous Fire Risk Reduction , East Bay Hills, California

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Oakland, CA 94618

10:00AM—Noon

NAME: PATRICK HOGAN

CONTACT INFO (optional): RACCOONSARECUTE@GMAIL.COM

COMMENTS:

I THINK THAT WILDLIFE IS BEING SERIOUSLY IGNORED - NATIVE BIRDS THAT ARE NESTING IN THESE AREAS RIGHT NOW ARE GOING TO BE ON THE CHOPPING BLOCK AS WELL + SHOULD/ARE PROTECTED BY FEDERAL LAW VIA THE MIGRATORY BIRD TREATY ACT - THERE IS MUCH MORE TO SAY, BUT NOT ENOUGH SPACE TO WRITE.

Signature and Date: PATRICK HOGAN - 5/18/13

437_Hogan_Patrick

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

Thank you!

NAME: Briony Greenhill

CONTACT INFO (optional): briony.greenhill@gmail.com

COMMENTS:

I am in support of replacing eucalyptos with other trees.

I am very strongly against leaving the hillside bare, and fiercely against pesticide use. I swim in the hills in the lake. please don't send poisons into that water, and into that ecosystem that so much life shares.

Signature and Date: B Greenhill 5/18/13

Hazardous Fire Risk Reduction, East Bay Hills, California

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NAME: SATI POWELL

CONTACT INFO (optional):

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COMMENTS:

I have serious concerns about the long term application of these herbicides to the East Bay Hills. We cannot know the long term effects of these herbicides on the ecology of the area or its effect on human health. I would like to see the public provided with more information on this, as well as other alternatives.

Signature and Date: 5/18/13

439_Powell_Sati

Hazardous Fire Risk Reduction , East Bay Hills, California

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NAME: Erin Tucker

CONTACT INFO (optional):

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10:00AM—Noon

COMMENTS:

While I understand the need for fire control as well as minimizing non native species this project seems archaic and has the potential to cause more environmental harm than good.

I do not wish to speak

Signature and Date: 5/18/13

440_Tucker_Erin

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10:00AM—Noon

NAME: Anne Novak

CONTACT INFO (optional):

COMMENTS:

oppose plan to kill 85K trees & use tons of pesticides in Oakland & Berkeley Hills

Signature and Date: 5.18.13

441_Novak_Anne

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10:00AM—Noon

NAME: TREVOR DARRELL

CONTACT INFO (optional): trevordarrell@gmail.com

COMMENTS:

HOW CAN THE AT&T PROPERTY ADJACENT TO GARBER PARK ~~RE~~ + CLAREMONT HOTEL ADDRESSED? THEY ARE NOT MANAGING THEIR TREES AND IT IS A HUGE RISK.

I SUPPORT THE PROPOSAL.

Signature and Date:

442_Darrell_Trevor

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10:00AM—Noon

NAME: DAVID McFARLANE

CONTACT INFO (optional): greenteylore@juno.com

COMMENTS:

I support removal of trees in the interests of fire control. However, I am concerned that there must be care exercised to protect sensitive areas - either erodible slopes, or important native plant areas, also the herbicide used may affect water quality & harm native plants & animals

Signature and Date:

443_McFarlane_David

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10:00AM—Noon

NAME: Joanne Orengo

CONTACT INFO (optional): greentheglobe@juno.com

COMMENTS:

We understand the need for fire danger mitigation.

BUT the use of Round-up (1400 gallons) is both unnecessary, and ridiculously overkill!

Signature and Date: Joanne Orengo

444_Orengo_Joanne

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Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: DAVID LEVY

CONTACT INFO (optional):

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10:00AM—Noon

COMMENTS:

PLANNING FOR A FIRE IS IMPORTANT. BUT IT MUST BE DONE ~~CAN~~ WITH CAREFUL EVALUATION. A COMPREHENSIVE FIRE PREVENTION STRATEGY MUST BE DONE.... INCLUDING COMMUNTY INPUT.

Signature ~~and Date~~: MAY 18, 2013

447_Levy_David

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME:

Joshua D. Berkowitz (Oakland, CA)

CONTACT INFO (optional): [redacted]

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COMMENTS:

I oppose these projects which would clear cut thousands of mature, healthy trees which are critical to the health of the ecosystem and habitat for biodiversity. These projects would increase rather than decrease fire hazard by transforming landscape to flammable chapparral. I oppose the use of toxic pesticides, which pose serious health threats to human and animal species, as well as contaminate the soil and water supply. The EIS does not adequately address the increased CO_2 emissions from the clearing, which is required under CEQA, which will have lasting detrimental environmental impacts.

Signature and Date:

5/18/13

448_Berkowitz_Joshua

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Oakland, CA 94618

10:00AM—Noon

NAME: PAMELA SIHVOLA

CONTACT INFO (optional): CMTW

P.O. BOX 9646 · BERKELEY, CA 94709

COMMENTS:

Signature and Date: Pamela Sihvola 5/18·2013

449_Sihvola_Pamela

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5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Dee Seligman

CONTACT INFO (optional): deesel91@gmail.com

COMMENTS:

SF

Signature and Date: Dee Seligman 5-18-13

450_Seligman_Dee

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NAME: Georgia Wright

CONTACT INFO (optional):

COMMENTS:

The example of Eucalyptus removal on Angel Island (1990) was followed in 2004, 2005, + 2008 by fires never before experienced.
Why has this not served as a cautionary example for UCB?

Signature and Date:

Georgia Wright May 18, 2013

451_Wright_Georgia

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Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: JEAN STEWART

CONTACT INFO (optional):

COMMENTS:

OPPOSE THE CLEARCUT

Signature and Date: Jean Stewart 5/18/13

454_Stewart_Jean

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

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5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Nancy McCoy

CONTACT INFO (optional): nancy@kauzmic

COMMENTS:

- The oak + Bay Trees will be retained
- But the "Sudden Oak Death" is Killing Oak Trees in Calif & Ore. -
- There is no cure & Bay Trees help Transmit that disease.
- For sure the oaks will die - That leaves Miles of just grassy hills That are Brown 3/4 of the year. The forests s/B thinned so forests Remain

Signature and Date: 5/18/2013

455_McCoy_Nancy

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

NAME: Robin Earth

CONTACT INFO (optional):

COMMENTS:

Oppose the clear cut

Signature and Date: Robin Earth 5/18/13

456_Earth_Robin

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

NAME: Janice Santos

CONTACT INFO (optional): _____

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10:00AM—Noon

COMMENTS:

oppose clear cutting

Signature and Date:

Janice Santos 5-18-2013

457_Santos_Janice

FEMA

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10:00AM—Noon

NAME: DIANE A. HILL

CONTACT INFO (optional): 6314 ASPINWALL RD
OAKLAND, CA 94611

COMMENTS:

SUPPORT FUNDING THE
FEMA GRANT

Signature and Date: Diane A. Hill 5-18-13

458_Hill_Diane

FEMA

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Jeff Kahn

CONTACT INFO (optional):

COMMENTS:

Home burned in 1991

Signature and Date:

Jeff Kahn 5/18/13

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459_Kahn_Jeff

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10:00AM—Noon

NAME: BOB FLASHER

CONTACT INFO (optional): rangerdude333@hotmail.com

COMMENTS:

SPEND MONEY IN COMMUNITIES — NOT ON FUELBREAKS — WHERE IT IS A BETTER INVESTMENT IN SAVING LIVES.

Signature and Date: Bob Flasher 5/18/13

460_Flasher_Bob

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

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10:00AM—Noon

NAME: Arthur Fonseca

CONTACT INFO (optional):

COMMENTS:

So is FEMA's solution for global warming to cause some more of it?

Thanx for the great job on New Orleans!

Signature and Date: Arthur Fonseca

461_Fonseca_Arthur

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Matt Morse

CONTACT INFO (optional): 510-282-0717

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10:00AM—Noon

COMMENTS:

Would like to speak about the need to seize this unique opportunity to correct the problems caused by the introduction of eucalyptus to the E.B. hills over 100 yrs ago.

Signature and Date:

Matthew J. Morse

462_Morse_Matt

FEMA (may want to speak)

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Marilyn Goldhaber

CONTACT INFO (optional): marilyngoldhaber@gmail.com

COMMENTS:
in member of the Claremont Canyon Conservancy — We support the EIS We support the landowners doing their job. The EIS is thorough and the problem has been studied long enough

Signature and Date: Marilyn Goldhaber

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463_Goldhaber_Marilyn

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

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10:00AM—Noon

NAME: Alice Friedemann

CONTACT INFO (optional): 510-601-8077
alice_friedemann@yahoo.com

COMMENTS:
My home burned down in the 1991 fire - it's about time this 2005-6 FEMA bill was put into action - past time!

Signature and Date: Alice Friedemann 5-18

464_Friedemann_Alice

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

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10:00AM—Noon

NAME: Zachary Running Wolf

CONTACT INFO (optional): runningwolf.zachary@yahoo.com

COMMENTS: No to any tree removal without replacement plan

Signature and Date: Zachary Running Wolf

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

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10:00AM—Noon

NAME: BERND CROUSE

CONTACT INFO (optional):

COMMENTS:

- Protect our trees and our parks
- Let nature live
- Don't poison us and our children
- Protect hazards with other means than cut and poison

Signature and Date: 5/18/2013

466_Crouse_Berno

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Steve Martinot

CONTACT INFO (optional): martinot4@gmail.com

COMMENTS: the plan does not take people into account enough.

Signature and Date: Steve Martinot 5/18/13

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467_Martinot_Steve

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Dennis Cabuco

CONTACT INFO (optional): bakelite@rocketmail.com

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10:00AM—Noon

COMMENTS:

environmental impact

Signature and Date:

Dennis Cabuco

468_Cabuco_Dennis

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: PETER SCHORER

CONTACT INFO (optional): 510 548-3827

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10:00AM—Noon

COMMENTS:

THE TREE CUTTING PLAN IS OUTRAGEOUS. WE HAVE HAD NO MAJOR FIRES LIKE THE OAKLAND HILLS FIRE SINCE EARLY 90'S. THERE IS A GREAT DEAL YOU COULD DO TO PREVENT FIRES OTHER THAN CUTTING THOSE TREES.

Signature and Date: Peter Schorer 5/18/13

469_Schorer_Peter

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: DAVID ELY [PRONOUNCED EE-LEE]

CONTACT INFO (optional): david.c.ely@sbcglobal.net

COMMENTS:
DOES THE FEMA GRANT INCLUDE FUNDING FOR THE PLANTING OF NATIVE SPECIES? IF NOT, WHY NOT?

Signature and Date: 18 MAY 2013

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470_Ely_David

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: MELISSA RILEY

CONTACT INFO (optional): _____

COMMENTS:

Signature and Date: Melissa Riley MAY 18, 2013

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10:00AM—Noon

471_Riley_Melissa

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Morgan Schmidt-Feng

CONTACT INFO (optional):

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10:00AM—Noon

COMMENTS:

I have a real problem with the use of Roundup or similar chemicals to kill the tree stumps. Very concerned about the creeks and animals that live in the area.

Signature and Date: Morgan Schmidt-Feng 5.18.13

472_Schmidt-Feng_Morgan

FEMA

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

NAME: Lee Edwards

CONTACT INFO (optional): caleesf@yahoo.com

COMMENTS:

A successful community action that impacts a broad geography, encompassing many jurisdictions, needs substantial community buy-in and input. Do you think you have the communities' support? Have you done adequate community notification and outreach?

Signature and Date: Lee R. Edwards 5-18-2013

473_Edwards_Lee

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

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10:00AM—Noon

NAME: Philip Stark

CONTACT INFO (optional): stark@nsklaw.org

COMMENTS:

I'm an avid trail runner - 60-100 mi/wk. The clear cutting - & especially the herbicides - will profoundly reduce my quality of life. I regularly run in Claremont Cyn. I will be afraid to expose myself to the toxins if this happens - I will lose recreational use of these areas.

Signature and Date: 5/18/2013

474_Stark_Philip

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Carol LaPlant

CONTACT INFO (optional): carollaplant@msn.com

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10:00AM—Noon

COMMENTS:

The proposed clearcutting/spraying would destroy the environment needed by wildlife species. No adequate replacement is proposed. The aesthetics and health benefits of trail use by humans would be devastated. Flawed logic supports the plan - only justification is "worst case scenario" of 1991, but efforts of firefighters have greatly mitigated this risk. This is "throwing out the baby with the bathwater."

Signature and Date: Carol P. LaPlant 5/18/13

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

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10:00AM—Noon

NAME: Beverly Potter

CONTACT INFO (optional):

COMMENTS:

Public Notice of cutting & Meeting INADEQUATE

Need to MAKE SURE public is notified - we - not gov bureaucrats decide about OUR community!! we need adequate info & notice

Signature and Date: Beverly Potter 5/19/13

476_Potter_Beverly

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

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10:00AM—Noon

NAME: Helen Kozoriz Shoemaker

CONTACT INFO (optional): helenkozoriz @ sbcglobal.net

COMMENTS:

Signature and Date: H Kozoriz Shoemaker 5/18/13

477_Kozariz Shoemaker_Helen

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Stephen Grettenberg

CONTACT INFO (optional): shgrettenberg@gmail.com

COMMENTS:

Signature and Date: 5-18-2013

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478_Grettenberg_Stephen

FEMA

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10:00AM—Noon

NAME: David Romain

CONTACT INFO (optional): Earth Steward

COMMENTS:

I am concerned that the trees in all public land be thinned according to State Standards to ensure healthy forests. And that we keep the forests alive and healthy.

Signature and Date: 18 May 2013

479_Romain_David

Hazardous Fire Risk Reduction , East Bay Hills, California

FEMA

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Patti Bick

CONTACT INFO (optional):

COMMENTS:

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Signature and Date:

480_Rick_Patti

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: JASPER LEACH

CONTACT INFO (optional):

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COMMENTS:

YOUR PROPOSAL SEEMS REMARKABLY SHORT-SIGHTED AND RINGS FALSE IN ITS STATED INTENT. FOREST FIRES ARE OFTEN A NATURAL CHECK-AND-BALANCE ON THE ENVIRONMENT'S PART, DESTRUCTIVE HERBICIDE USE AND CONTROLLED BURNS ARE OVERREACHING INTERFERENCE.

Signature and Date: 5/18

481_Leach_Jasper

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Curtis Manning

CONTACT INFO (optional): 510 841-8562

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10:00AM—Noon

COMMENTS:

Urban forests need to be maintained. FEMA approach of clear-cutting can be a disaster for the animals & plants that live there.

I recommend a gradual, human-scale removal of fire dangers, and a gradual transformation to a manageable urban resource.

Signature and Date: Curt Manning 5/18/13

482_Manning_Curtis

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

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10:00AM—Noon

NAME: Melissa Washburn

CONTACT INFO (optional): [redacted]

COMMENTS:

The Environmental impacts of this proposal (too numerous to write down here) alone, should stop this project in its tracks.
I will do everything I can to stop this project!

Signature and Date: Melissa Washburn 5/15/2013

483_Washburn_Melissa

FEMA

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: MICHAEL WARBURTON

CONTACT INFO (optional): PUBLIC TRUST ALLIANCE

COMMENTS:

Signature and Date: Michael Warburton 5/18/13

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484_Washburton_Michael

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

NAME: Phoebe Sorgen

CONTACT INFO (optional): _____

COMMENTS:

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Signature and Date: Phoebe Sorgen 5.18.13

485_Sorgen_Phoebe

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10:00AM—Noon

NAME: WARREN CHICK (SINCE 1945)

CONTACT INFO (optional): 510 843 3554

CHICK.PERE@COMCAST.NET

COMMENTS:

VERY CONCERNED ABOUT TREE REMOVAL ALONG GRIZZLY PEAK BLVD IN OAKLAND. WANT TO SAVE "NON-NATIVE" TREES AND MANAGE THEM INSTEAD BY TRIMMING THEM AS WELL AS NATIVES. CONSIDER BEAUTY AS A VALUE.

Signature and Date:

W Chick

486_Chick_Warren

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10:00AM—Noon

NAME: Chalyn Newman

CONTACT INFO (optional): chalynnewman@yahoo.com

COMMENTS:

① Concerned about the use of Round Up - a known carcinogen / What other methods of weed & regrowth deterents were considered?

② what measures will be taken to diminish the impact on the animal & plant eco systems during clearing?

③ what impact will cutting over 100 thousand trees have on our air quality?

Signature and Date: Chalyn Newman 5/18/13

487_Newman_Chalyn

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10:00AM—Noon

NAME: Yolanda Huang

CONTACT INFO (optional): yogreening@gmail.com

COMMENTS:

1. insufficient notice to community
2. insufficient study on impact to:
   bird habitat
   ecology
   carbon sequestration
   impact on users

Signature and Date: Yolanda Huang 5.17.2013

488_Huang_Yolanda

FEMA

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10:00AM—Noon

NAME: Derek Wallace

CONTACT INFO (optional): alovereaction@gmail

COMMENTS:

I am here to voice my opposition to any clear cutting of trees in Berkeley and Oakland and DEFINITELY in opposition to the use of any herbicides like Roundup being used. No Poisons in the Bay!

Signature and Date: Derek C. Wallace 05/18/2013

489_Wallace_Derek

FEMA

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10:00AM—Noon

NAME: Marie Pagliavini

CONTACT INFO (optional):

COMMENTS:

I am opposed and will articulate why when I speak.

Signature and Date: May 18, 2013

490_Pagliavinl_Marie

Hazardous Fire Risk Reduction , East Bay Hills, California

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10:00AM—Noon

NAME: FRED WERNER

CONTACT INFO (optional): 640 Panoramic Way

COMMENTS:

As ecologist, science teacher, who worked on invasive species control, I support restoring native vegetation, and removing invasive exotics. But oppose methods such as glyphosate and spreading wood chips

Signature and Date: Fred Werner 5/18/13

491_Werner_Fred

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10:00AM—Noon

NAME: Carolyn

CONTACT INFO (optional):

COMMENTS:

Not only will this project devastate our environmental climate, but our cultural climate as the latter greatly depends on the former. The local beauty is largely the reason people settle here.

Signature and Date: Carolyn LeBourges 5/18/13

493_LeBourges_Carolyn

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

NAME: JAMES DOHERTY, Calif. alumni Assn

CONTACT INFO (optional):

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

Oakland, CA 94619

2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

COMMENTS:

UC Berkeleys Environmental Sensitivity - thus far

Signature and Date:

494_Doherty_James

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Jesse Tieger

CONTACT INFO (optional):

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

Oakland, CA 94619

2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

COMMENTS: I am adamantly opposed to this proposed project. I am aware that there are legitimate fire hazard issues in the Oakland/Berkeley Hills. However, the planned removal of 85,000 non-native trees with the use of 1,400 gallons of toxic ~~pesticides~~ herbicides and replacement with 24" of wood chips and no plan for replacement of these trees w/ native species is not acceptable. Clearcutting and leaving wood chips in their place of these trees is not the answer.

Signature and Date: 5/18/13

495_Tieger_Jesse

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Marg Hall

CONTACT INFO (optional): 510 654 1366

COMMENTS:

Signature and Date: Margaret Hall 5/17/13

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

Oakland, CA 94619

2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

496_Hall_Marg

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

NAME: TEDI CRAWFORD

CONTACT INFO (optional):

COMMENTS:

– Short –

Signature and Date:

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

Oakland, CA 94619

2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

497_Crawford_Tedi

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

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Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Helen Wood

CONTACT INFO (optional):

COMMENTS:

Signature and Date: Helen S Wood

498_Wood_Helen

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: ALAN BERNHEMER

CONTACT INFO (optional): _____

COMMENTS:

Signature and Date: Alan Bernhemer 5/18/13

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

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Oakland, CA 94619

2:00 PM—4PM & 6PM—8PM

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Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

499_Bernhemer_Alan

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

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Main Room

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Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: & Samara Fox

CONTACT INFO (optional):

COMMENTS:

Signature and Date: 5/18/13

500_Fox_Samana

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

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Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: ETHAN RAMIREZ

CONTACT INFO (optional):

COMMENTS: I DO NOT SUPPORT THE PLAN. NO ACTION IS WHAT I SUPPORT.

Signature and Date: 5/18/13

501_Ramierez_Ethan

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

Tuesday, May 14, 2013

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Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: ARAM ANTARAMIAN

CONTACT INFO (optional): ARAM@EFF.ORG

COMMENTS:

The plan fails to make use of proper land stewardship practices and does not protect habitat, diversity, and environmental protection from toxics. Long established land management practices must be used in any projet of this kind.

Signature and Date: 5/

502_Antaramian_Aram

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

Tuesday, May 14, 2013

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Main Room

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Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Lauren Jensen

CONTACT INFO (optional): indigotulip@gmail.com

COMMENTS:

The proposals are disingenuous in purpose and proposed solution + benefit. The EIS states it does not consider the most common, time-proven fire hazard solutions. The projects do not serve the publicized or FEMA goals + this is improper use of our funds.

FEMA - please do nothing as currently presented.

Signature and Date: Lauren Jensen 5/17/2013

503_Jensen_Lauren

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

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Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: KRISTAN WILLITS

CONTACT INFO (optional):

COMMENTS:

NO ROUNDUP / OTHER HERBICIDE!
NO CLEAR CUT! → HUGE EROSION / SOIL INSTABILITY / DESTRUCT. OF SPECIES
~~BS~~ I COULD SUPPORT CAREFUL SELECT REMOVAL + thinning + steps of Environ. Care! AND MORE EDUCATION TO HOMEOWNERS.

Signature and Date:

504_Willits_Kristan

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

NAME: Carolyn Mahoney

CONTACT INFO (optional):

Tuesday, May 14, 2013

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Main Room

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Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

No more Roundup!

No on EIS.

COMMENTS:

200 Trees near my home were removed by slash logging to "prevent fires". Results: Owls left area, wildlife moved. Wind + noise substantially increased. H_2O runoff is ↑. It's an eyesore and will be for the next decade.

Signature and Date: Carolyn Mahoney 5/18/2013

505_Mahoney_Carolyn

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

Tuesday, May 14, 2013

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Main Room

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Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Lisa Chacon

CONTACT INFO (optional): lisachacon@gmail.com

COMMENTS:

I oppose the plan for a number of reasons. The proposed cutting, chipping and herbicide will create a greater fire hazard and not meet the goals of protecting people & homes.

There are alternative approaches of highly selective clearing of brush & undergrowth, and replanting with other →

Signature and Date: L Chacon 5/18/13

506_Chacon_Lisa

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

Tuesday, May 14, 2013

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Main Room

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Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Ruth McArthur

CONTACT INFO (optional): Not offering as I don't want it made public

COMMENTS: Monsanto. Round-up Herbicides ~~Pesticides~~ must NOT be used. Clear cutting is bad. Damage to eco-system, wildlife and to humans will be so detrimental. I understand need for wild fire control but only underbrush should be cleared and only non-native eucalyptus trees should be considered for removal. If private enterprise works to go forward, I do not support them. But Fema should Not be involved. I do NOT want my tax money paying for this.

Signature and Date: Ruth McArthur 5/18/13

Fema should help homeowners to clear flammable material from around their own homes.

507_McArthur_Ruth

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

NAME: Kim

CONTACT INFO (optional):

Tuesday, May 14, 2013

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Main Room

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Claremont Middle School

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5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

COMMENTS:

· the Plan needs a long term solution. Rebuild slowly a proper urban Forest.
NO · herbacide. No Roundup
use the Ca conservation Corp to manage brush & develop a proper urban forest.

Signature and Date: 5/18/13

508_Kim

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

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Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Ian Winters

CONTACT INFO (optional):

COMMENTS:

I find the EIS insufficient. it does not meaningfully address alternatives such as animal fuel load reduction, ~~[illegible]~~ risks via predators, and ~~[illegible]~~ damage by failure to provide restoration funding. goals)

Signature and Date: 5/18/13

509_Winters_Ian

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

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Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: MARY WHITE

CONTACT INFO (optional): mwhite.glass@mac.com

COMMENTS:

I am opposed to the proposed fire risk reduction project. Do not proceed. There are alternatives, for instance yearly pruning. Roundup use is outrageous. It will get in watersystem, toxic

Signature and Date: Mary White May 18, 2013

510_White_Mary

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: Ciara Sudjian

CONTACT INFO (optional): ciarasc@yahoo.com

Tuesday, May 14, 2013

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Main Room

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Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

COMMENTS:

Why is there less emphasis on preservation and protection? Preservation of trees, wildlife and protection of homes and businesses from potential fire ~~hazards~~ risks?

Signature and Date: 5/18/13

511_Sudjian_Ciara

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

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5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Steven Jenner

CONTACT INFO (optional):

COMMENTS:

Tall trees create a wet environment. Fog - 12 months a year - collects in these trees and breezes create rain fall. Barren hills encourage grass - a very serious fire hazard.

Signature and Date: Steve Jenner 5-18-13

512_Jenner_Steven

FEMA

Hazardous Fire Risk Reduction, East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

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Oakland, CA 94619

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Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Melissa Wolf

CONTACT INFO (optional):

COMMENTS: I am against the proposals! The amount of herbicide dumped to prevent stump re-growth will not create a conducive environment for native species to propagate. Toxic soil and bare hills w/ flammable wood chips do not feel like a solution

Signature and Date: 5/18/13

513_Wolf_Melissa

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

NAME: Megan Neal

CONTACT INFO (optional): 510-688-9968

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

Oakland, CA 94619

2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

COMMENTS:

Signature and Date:

514_Neal_Meghan

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

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2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: ARIEL H.

CONTACT INFO (optional):

COMMENTS:

LET'S NOT MAKE THIS ABOUT MONEY!

Signature and Date: 5/18/13

515_H_Arise

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FEMA

Tuesday, May 14, 2013

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Main Room

11500 Skyline Boulevard

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2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

NAME: Lauren Elder

CONTACT INFO (optional): laurenelder@sbcglobal.net

COMMENTS:

I am firmly opposed to this proposed plan.

The trees should be preserved for air quality, carbon sequestration, enjoyment of by people - animal habitat.

Selective minimal cutting OK.

Signature and Date: Lauren C Elder 18 May 2013

516_Elder_Lauren

May 20, 2013

RECEIVED
MAY 22 2013
BY:

FEMA
1111 Broadway, Suite 1200
Oakland, CA. 94607

RE: Draft EIS (UCB, City of Oakland, EBRP)

To Whom It May Concern:

As written, the Draft EIS for East Bay Regional Park, University of California and the City of Oakland vegetation management projects is unacceptable since it does not adequately address the effects of these projects on Greenhouse Gas emissions and carbon sequestration capacity. The EIS uses an inappropriate baseline and also fails to consider the loss of ongoing carbon sequestration that will certainly result from these projects. The EIS baseline only accounts for the difference between a full forest of trees and a completely denuded area of that forest. What happens six months or a year after the clear cutting?

I believe the EIS inadequately addresses the cost and risk to small animals and children associated with the use of Herbicides. By reducing the number of trees they propose to clear cut, they would substantially reduce the amount of toxic herbicides and reduce the cost as well.

EBRPD has come closest to what seems a logical approach towards fire risk mitigation with their proposal to eliminate understory from the forest then trim up branches of all trees as well as cut down smaller trees to give space for the larger trees to continue to grow their canopes.

I respectfully request that you ask all three agencies to redirect their work towards fire risk mitigation and not native plant restoration. There simply is no physical way for all the non-native trees to be eliminated without causing dramatic changes in the hills environment.

Thank you the time and effort you and your staff have put into these projects. Sincerely,

M Baer

M Baer
1227 Alvarado Road
Berkeley, CA 94705

OAKLAND CA 945

21 MAY 2013 PM 7 L

FEMA Sandro A
1111 Broadway, Ste 1200
Oakland, CA 94607

94607405200

MJB
ASSOCIATES

1227 Alvarado Road
Berkeley, CA 94705

Cynthia S. Brown
And Jack Robbins
139 Stonewall Road
Berkeley, CA 94705

FEMA
P. O. Box 72379
Oakland, CA 94612-8579

Dear FEMA,

We strongly support the wildfire hazard mitigation projects for the East Bay Hills. They have been studied long enough. The EIS findings of improved fire safety and likely long-term enhancement to the land should move forward without delay. We residents of Claremont Canyon know only too well how the eucalyptus canopy will spread wildfire dramatically once it starts during our windy fire season. We want the removal of invasive trees and an annual follow-up to discourage re-growth and weeds, so that our native vegetation can thrive once again.

Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,

Cynthia S. Brown

Jack Robbins

Brown
139 Stonewall Road
Berkeley, CA 94705

OAKLAND CA 945
18 MAY 2013 PM 8 L

FEMA
P.O.Box 72379
Oakland, CA 94612-8579

94612857979

FEMA

P. O. Box 72379

Oakland, CA 94612-8579

Re: I support the East Bay Hills EIS

I personally watched from atop Panoramic Hill, during the 1991 East Bay Hills fire, as eucalyptus and other trees exploded in flames, engulfing nearby homes. That experience convinced me that we need the remediation that is subject of this EIS.

I am very interested in seeing the subject EIS approved and the start of remedial action in connection with this hazard. I believe that the case in favor of approving the EIS without further delay has been made, and that it should be approved so that work can begin.

In addition to the hazard to people living in the East Bay Hills, it is important to me as a parent and grandparent that we recognize that the future monetary cost of safely dealing with the trees now growing will impose an immense financial burden on future generations.

The time to act and approve this EIS is now!

Sincerely,

R. M. White

Richard M. White, East Bay Hills resident

R. White
350 Panoramic Way
Berkeley, CA 94704

OAKLAND CA 945

16 MAY 2013 PM 6 L

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

EIS

94612857379

523_White_Ronald

Bernadette Bell
Kenneth Wachter
85 The Plaza Dr.
Berkeley, CA 94705

15 May 2015

FEMA
Box 72379
Oakland, CA. 94612-8579

Re: Support for EIS
for East Bay Hills

Dear FEMA,

as local resident, we support the Environmental Impact Statement for the East Bay Hills, and urge that fire mitigation efforts begin soon.

Sincerely,

Ken Wachter

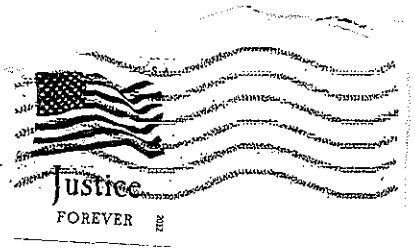
Residents since 1977

510-601-8564

Bernadette Bell
Kenneth Wachter
85 The Plaza Dr.
Berkeley, CA 94705

Re. EIS -
East Bay Hills

OAKLAND CA 945
16 MAY 2013 PM 3 1



FEMA
PO Box 72379
Oakland, CA. 94612-8579

94612857979

Mr. Alex Pappas
1333 Drury Rd
Berkeley, CA 94705-1623

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

Re: Support of EIS for East Bay Hills

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term enhancement to the land should move forward without delay. We Claremont Canyon residents know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive.

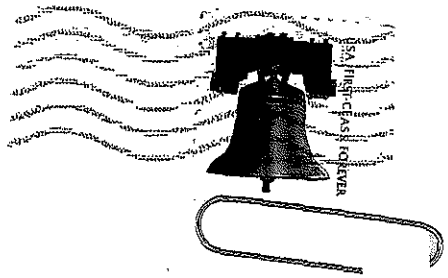
Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,

Mr. Alex Pappas
1333 Drury Rd
Berkeley, CA 94705-1623

Alex Pappas

I've been here 43 years - through two fires.



OAKLAND CA 946

15 MAY 2013 PM 3 L

9461287979

Mr. Alex Pappas
1333 Drury Rd
Berkeley, CA 94705-1623

WALTER J. CANNADY
8242 SKYLINE BLVD,
OAKLAND, CA. 94611
(510) 339-34324

May 14, 2013

EBH-EIS
P.O. BOX 72379
OAKLAND, CA. 94612-8579

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Sir/ Madame;

Due to a temporary physical infirmity, I was unable to attend the meeting of today's date and unable to download the report due to machine malfunction. If possible, I wonder if you could mail me a copy?

Living in the Oakland Hills for over 30 years, I am quite aware of the fire danger and prepared to take the risk. If I was concerned with such, I certainly wouldn't have lived in the Oakland Hills this long but moved to a "safer" but uglier environment such as Alameda, where I was born, or where there is no "vegetation", such as Modesto or Turlock.

I would certainly be circumspect of the alleged experts in these matters. I remember during the '70's a particularly cold winter, the "great" botany experts from the University of California claimed that a grove of trees at Skyline and Sheppard Canyon froze and were dead. They clear cut down all of the trees in the area making the area look worse than what the Firestorm area looked like. The following years all of those "dead" trees came back to life, thankfully. We need more trees, not less. I'm willing to gamble to have that beauty. Thank you.

Very truly yours,

WALTER J. CANNADY

Walter Cannady
8242 Skyline Blvd
Oakland, CA 94611-1542

OAKLAND CA 945
15 MAY 2013 PM 4 L

Freedom
FOREVER

EBH-EIS
P.O. BOX 72379
OAKLAND, CA. 94612-8579

94612857979

JILL HOROWITZ, L.C.S.W.
107 ALVARADO ROAD
BERKELEY, CALIFORNIA 94705
TELEPHONE (415) 921-6150

May 15, 2013

To: FEMA

I live and work at 107 Alvarado Road, Berkeley, 94705. [However I cannot attend a public hearing because I am in the hospital. (Summit SNF).]

The fire in 1991 came all the way to our back yard and was partly fought from there.

We are terrified of the Eucalyptus trees as they are so flammable.

We urge you to approve the EIS as is and release the funds so the vegetation

management work can proceed without delay.

This is another dry year and is a crisis for potential fires!!

I understand the alternative is to not provide any funding. Then, the problem would continue and get worse as the Eucalyptus grow. For us, this might literally be a matter of life and death.

I urge you with all my heart to approve the funding.

Jill Horowitz

YOSEMITE CONSERVANCY
Mr. Jonathan Kaufman
107 Alvarado Rd
Berkeley, CA 94705

OAKLAND CA 946
15 MAY 2013 PM 4 L

East Bay Hills EIS
Federal Emergency Management Agency
P.O. Box 72379
Oakland, CA 94612-8579

94612857979

FEMA

P.O. Box 72379

Oakland, CA 94612-8579

May 14, 2013

Re: Support of EIS for East Bay Hills

Dear FEMA,

In 1991, my wife and I were home to witness the rapid spread of the Tunnel Fire into our Hiller Highlands neighborhood. On that hot windy day I was out on the street looking up at the plume of brown smoke pouring over the ridge to our North. Suddenly, a small grove of eucalyptus trees on Grand View Dr. burst into flame. There was no fire front that ignited this grove just the falling embers that were now raining down on my street. The Monterrey Pine behind our home burst into flame as these falling embers ignited dead pine needles caught up in the branches. In the time that it took me to get my wife and notify neighbors that we should leave immediately the day had turned to night. As we climbed into our car the smoke had turned black and was full of burning embers and it had descended onto the street limiting our visibility to a few feet. My last recollection as I drove out was the burning eucalyptus leaves bouncing down the street. When we exited Hiller no homes were on fire but the fire had already jumped Hwy 24 and spot fires were burning on the adjacent slopes West of Lake Temescal. Although we are uncertain how the original fire was started, I know with the certainty of someone who was present on that fateful day that eucalyptus played a vital role in spreading the fire downwind.

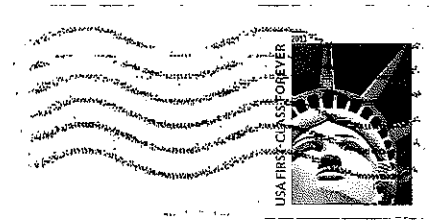
I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term enhancement to the land should move forward without delay. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive. Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,

Frederick Booker & Blythe Mickelson

1370 Grand View Dr.

Berkeley, CA 94705



Fred Booker & Blythe Mickelson
1370 Grand View DR.
Berkeley, CA 94705-163270

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

6889 Bristol Drive
Berkeley, CA 94705
May 16, 2013

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

Re: Support of EIS for East Bay Hills

Dear FEMA,

I lost my house in the fire in 1991. Although I no longer live in that rebuilt house on Vicente Road, I now own and live in a house on the other side of the Fire Zone. I therefore have a very strong personal interest in your EIS.

I strongly support the wildfire hazard mitigation projects described in your EIS. I believe that you have carefully studied different approaches and that your EIS contains the best options. I do want to see the invasive eucalyptus trees removed, using relatively safe methods. I believe that the removal of the eucalyptus should be followed by annual efforts to discourage regrowth and encourage native vegetation to return.

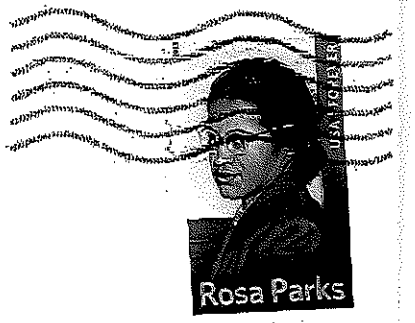
Please approve the EIS as soon as possible.

Best regards,

Susan Blumstein

MUIR WOODS
Susan Blumstein
6889 Bristol Dr
Berkeley, CA 94705-1702

OAKLAND CA 945
16 MAY 2013 PM 3 L



FEMA (EBH-EIS)
P.O. Box 72379
Oakland CA
94612-8579

94612857979

FEMA

Tuesday, May 14, 2013

Richard C. Trudeau Training Center

Main Room

11500 Skyline Boulevard

Oakland, CA 94619

2:00 PM—4PM & 6PM—8PM

Saturday, May 18, 2013

Claremont Middle School

Gymnasium

5750 College Avenue

Oakland, CA 94618

10:00AM—Noon

Hazardous Fire Risk Reduction , East Bay Hills, California

DRAFT ENVIRONMENTAL IMPACT STATEMENT

NAME: DIANE A. HILL

CONTACT INFO (optional): 6214 ASPINWALL RD
OAKLAND, CA 94611 (510) 339-0507

COMMENTS:

I support funding the grant applications submitted to FEMA by EBRPD, UCB, and the City of Oakland through Cal/EMA.
In response to a comment made at the hearing held on May 14, 2013, I would like to add that non-native vegetation was removed by Wildfire Prevention Assessment District (WPAD) and native vegetation took root in the area and grew!
My parents lived through the 1991 firestorm, and we don't want to repeat that terrible experience!

Signature and Date:

Diane A. Hill, Member, Wildfire Prevention Assessment District, Citizens Advisory Com. 5-15-2013

Diane A. Hill
6214 Aspinwall Rd.
Oakland, Ca 94611

15 MAY 2013 PM 9 L

CELEBRATE!

EBH-EIS
P.O. Box 72379
Oakland, Ca 94612-8579

94612857979

Marc and Vallery Feldman 11 Strathmoor Dr., Berkeley, CA 94705 510-849-3210 vallerose@comcast.net

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

May 14, 2013

Re: Support of EIS for East Bay Hills

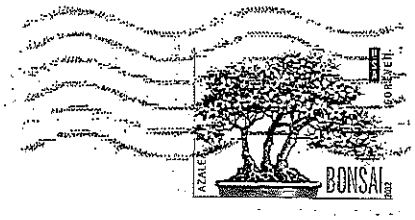
Dear FEMA,

As 33-year residents of the Oakland Hills, we strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. We believe the Environmental Impact Statement (EIS) findings of improved fire safety and likely long-term enhancement to the land should move forward without delay. We Claremont Canyon residents know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive. To keep eucalyptus stumps from re-sprouting, they must be treated with *Garlon, Roundup* or other product within a few minutes after the tree has been cut down. Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,

Vallery and Marc Feldman

Ms. Vallery Feldman
11 Strathmoor Dr
Berkeley, CA 94705



FEMA
P.O. BOX 72379
OAKLAND, CA 94612-8579

94612857979

ED MATNEY

38 Conrad Ct. • Oakland, CA 94611
510-339-1527 •mobile 651-226-1048
edmatney@earthlink.net

May 14, 2013

We strongly support removal of the invasive fire prone species covered in the FEMA grant. Protecting human life should be the number one priority; all other concerns are secondary.

As long as humans continue living in the Oakland Hills, we need to remove combustible non-native species.

Thank you,

Ed Matney

Ed Matney

Susan DeVico

Susan DeVico

38 Canada Ct
Oakland CA
94611

Beresford Parlett
284 Alvarado Rd.
Berkeley, CA 94705

Re: Support of EIS for East Bay Hills

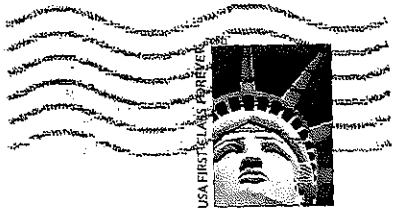
Dear FEMA

I support the EIS projects. My home was destroyed in the 1991 firestorm and naturally I am a keen supporter of the Claremont Canyon Conservancy ever since.

It is over 20 years since that fire and we in the conservancy have been frustrated that more could not have been in this long period to remove / reduce the stands of Eucalyptus in this area. I hope that you can approve the EIS.

BN Parlett
284 Alvarado Rd
Berkeley, CA 94705

OAKLAND CA 945
21 MAY 2013 PM 4 L



FEMA
P.O. Box 72379
Oakland, CA 94612-8579

533_Parlett_Beresford

FEMA

P.O. Box 72379

Oakland, CA 94612-6579

May 29, 2013

Re: Support of wildfire hazard mitigation for East Bay Hills

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills. The environmental impact study findings of improved fire safety should move forward without delay. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, the hills will become fire resistant. Thank you for supporting this important work. Please approve the EIS as soon as possible.

Allan Feinstein

Allan Feinstein

6181 Contra Costa Rd

Oakland CA 94618

Allan Feinstein
6181 Contra Costa Rd
Oakland, CA 94618-2140

20 MAY 2013 PM 9 L

Freedom
FOREVER

FEMA
P.O. Box 72379
Oakland CA 94612-8579

Mrs. Blossom H. Hofmann
295 Gravatt Dr
Berkeley CA 94705-1530

May 18, 2013

TO FEMA:

I WANT TO ADD MY VOICE TO THE MANY OTHERS WHO WILL BENEFIT FROM EVERYTHING THAT CAN BE DONE TO REDUCE THE DANGER OF ANOTHER FIRE IN THE EASTBAY HILLS.

THE FUNDS SHOULD BE RELEASED IMMEDIATELY TO GET THE REMOVAL OF HAZARDOUS VEGETATION TO PREVENT ANOTHER TRAGEDY OCCURRING.

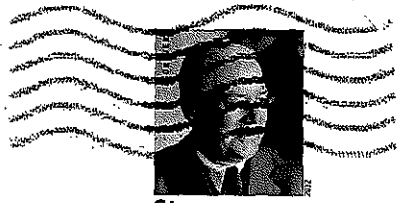
YOURS TRULY,

Blossom Hofmann

Mrs. Blossom H. Hofmann
295 Gravatt Dr.
Berkeley, CA 94705-1530

OAKLAND CA 945

21 MAY 2013 PM 4 L



FEMA
P.O. Box 72379
OAKLAND, CA 94612-8579

511 Dwight Place ❖ Berkeley ❖ California 94704
(210) 464-7122 ❖ <zygomate@att.net>

FEMA
P. O. Box 73379
Oakland, CA 94612-8579

16 May 2013

Re: Reception of the Environmental Impact Study
For the East Bay Hills

Dear Sir/Madame

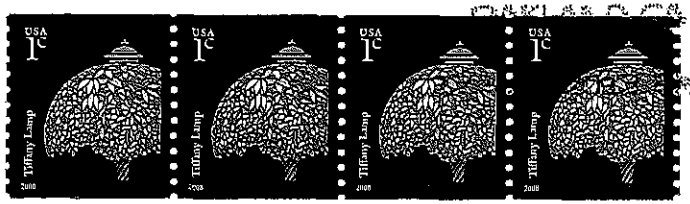
I strongly support the wildfire hazard mitigation projects for the East Bay Hills, which have been in the works since the 1991 East Bay Hills firestorm. These mitigation proposals have been under the microscope for far too long, considering that eucalyptus — the main culprit – is a non-native species which was almost entirely absent from our hills a century ago. I believe that the EIS findings of improved fire safety and long-term enhancement to the land should move forward without delay.

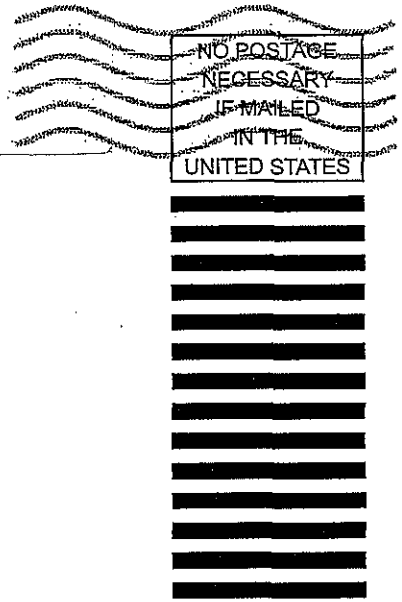
When I look out my window, I see a grove of 200+ eucalyptus trees below me, growing taller and wider and now not more than 50 yards away from the property of all the residents of Dwight Place, not to mention the eucalyptus groves crowding the spaces of the adjacent property of the University of California — a disaster waiting to happen. We know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of these invasive trees, and annual follow-up to discourage re-growth and weeds, native vegetation (more hardy and fire-resistant) will return and thrive.

I urge you to support this EIS report, and allow funding to proceed on our various mitigation proposals.

Sincerely

R. B. Rose
511 Dwight Pl.
Berkeley, CA
94704





F. E. M. A.
P. O. Box 72379
Oakland, CA 94612-8579

94612857979

MoveOn.org Petitions

About Feedback Login

START A PETITIONMANAGE PETITIONSAPPLY FOR FUNDINGCAMPAIGN TIPSDONATE

Sign this petition

Name* DAN KAPLAN, M.D.

Email* ~

United States yes

Address 16 HAWKS HILL

Address (cont.)

City OAKLAND

State CA

ZIP Code* 94618

Comment I barely escaped the 1991 Firestorm fueled by eucalyptus & French broom. We must prepare for next disaster!

Sign the petition!

Daniel Kaplan, MD

Privacy policy

Note: By signing, you agree to receive email messages from MoveOn.org Civic Action and MoveOn.org Political Action. (You may unsubscribe at any time.)

SUPPORT EAST BAY HILLS EIS TO PROMOTE FIRE SAFETY AND SCIENCE-BASED CONSERVATION

By Jon Kaufman (Contact)

To be delivered to: FEMA

PETITION STATEMENT

FEMA should approve the draft EIS as soon as possible so that funds will be released and projects to mitigate fire danger in the East Bay Hills can begin. The projects planned by UC, EBRPD, and the city of Oakland to reduce the risk of serious wildfire in the east bay hills balance fire risk reduction with concerns for the environment. The proposed actions are supported by the facts and science:

• The fire danger posed by stands of eucalyptus trees, compared to other tree species, has been thoroughly studied and is well-documented.

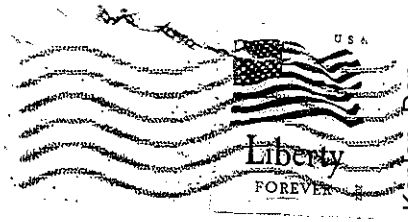
• The risk of uncontrolled wildfire in ecosystems dominated by eucalyptus poses a demonstrated risk to nearby neighborhoods and a larger danger of the release of carbon dioxide into the atmosphere than the one-time cutting of eucalyptus, which will be rapidly replaced by other species which absorb carbon dioxide.

• The existing understory and numerous remaining trees and plants will rapidly take the place of the cut eucalyptus. "Clear-cutting" and "deforestation" are misleading, unscientific descriptions of the planned measures.

UC, EBRPD, and the city of Oakland have no profit or ulterior motive for the proposed land stewardship measures, which are based on science and long-term planning for

CA Dem
Dr. Daniel Kaplan
16 Hawks Hill Ct
Oakland CA 94618

OAKLAND CA 945
23 MAY 2013 PM 6 L



FEMA
PO Box 72379
Oakland, CA
94612

94612857979

537_Kaplan_Dan

MARTHA H. BREED
1285 CLOVER LANE
WALNUT CREEK, CA 94595
(925) 935-3634

May 22, 2013

FEMA
PO Box 72379
Oakland CA 94612-8579

RE: SUPPORT of EIS for East Bay Hills

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term enhancement to the land should move forward without delay.

As a Claremont Canyon supporter and former Rockridge neighborhood resident, I know that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive.

Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,

Martha H. Breed

Martha H. Breed

1285 CLOVER LANE
WALNUT CREEK CA 94595

23 MAY 2013 PM 7 L

Liberty
FOREVER

FEMA
PO Box 72379
Oakland CA 94612-8579

94612857979

Wendy Williams
33 Tanglewood Road
Berkeley, CA 94705
(510) 549-9855

FEMA
P.O. Box 72379
Oakland, C 94612-8579

21 May 2013

RE: Support of EIS for East Bay Hills

Dear FEMA,

I strongly support wildfire hazard mitigation projects for the East Bay Hills and I believe the environmental impacts have been thoroughly detailed and comprehensively studied. I believe the Environmental Impact Statement findings of improved fire safety and likely long-term enhancement to the land by removing eucalyptus should proceed without delay.

As a resident of Claremont Canyon, I know that when ignited, the eucalyptus canopy can and will spread wildfire rapidly and dramatically during our windy fire season. With removal of invasive trees and annual follow-up to discourage re-growth and weeds, native vegetation will thrive and we will all be safer.

Thank you for supporting this important work. Please approve the Environmental Impact Statement to facilitate reducing our fire risk, and enhance our native vegetation, as soon as possible.

Sincerely,

Wendy Williams

33 Tanglewood Road, Berkeley, California 94705

6940 Charing Cross Road
Berkeley, CA 94705

May 16, 2013

FEMA

P.O. Box 72379

Oakland, CA 94612

Dear FEMA:

[East Bay Hills Hazardous Fire Risk Reduction Project]

I want to start off by saying I truly appreciate all of the positive changes you make in our society, especially when it comes to creating a healthy environment. My name is Sydney and I am a 16 year old attending Oakland Technical High School. I am writing this letter regarding the wildfire hazards that Eucalyptus trees present in the East Bay hills. As a resident of this area, wildfires have become a rising concern among my peers and neighbors, especially considering that the average wildfire happens about every 20 years, and it's been 22 years since the 1991 firestorm. More specifically, Eucalyptus trees, a non-native plant to California, have become a popular topic due to their high flammability. Eucalyptus oil is among one of the most flammable substances and these trees have been known to explode once ignited with the smallest flame. According to the U.S. Department of the Interior Fire and Fuels Management, it's been estimated that 70% of the energy released through the combustion of vegetation in the Oakland fire (which burned down almost 3,000 homes and killed 25 people) was due to Eucalyptus. I think it's fair to say that these trees cause much concern for valid reasons. To the west of the Caldecott Tunnel, there is a hill that consists of nothing but hundreds of Eucalyptus trees. If there were to be a wildfire, this hill would instantly combust and create a much bigger problem. In order to prevent this from happening, I believe these trees should be cut down. The loss of this tree however would not hurt Oakland's ecosystem considering it is not a native plant. Infact, it competes with California's native plants and does not support native animals. Besides causing fire hazards, these trees have caused many personal and emotional concerns within my community.

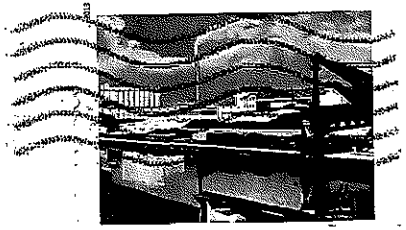
During the 1991 Oakland wildfire, every single house on my street was burned down (along with many other streets and neighborhoods) and these families were left with nothing. Their whole lives were instantly turned into ashes. My neighbor, Terry Galloway, stated that "As one who escaped both the 1972 and 1991 fire, it is important for our neighborhood to remember our history and the real causes for the fire spreading from Eucalyptus embers." 11 out of the 25 people killed in the 1991 fire died on my street and another was badly burned. Although my family did not reside in the East Bay Hills until January of 1999, I can still sense the physical and emotional damages that these wildfires have caused. Even 22 years after the fire happened, my neighbors still remember the horrific event, and continue to plant flowers on every 20th of October in remembrance of the members of our community that we lost.

People that are opposed to removing Eucalyptus trees are mainly concerned with the fact that there will be patches of stumps in the spots where the trees are removed. However, if we replace the cut down trees with less-flammable native species, not only will it support native animals, but it will make our community much safer if another wildfire does occur. In my opinion, I believe that we as a community should place our personal safety and that of our neighbors as a priority over scenic views. Considering that these wildfires were not a one time event but are an ongoing problem, we should take immediate action to protect the community we've spent so many years to rebuild.

Thank you and best wishes,
Sydney Imus-Hanlon

6940 Charing Cross Road
Berkeley, CA 94705

OAKLAND CA 945
21 MAY 2013 PM 4 L



Charles Sheeler | *forever* | usa

FEMA
P.O. Box 72379
Oakland, CA 94612

94612857979

2013-05-17

1436 8th st
Berkeley, CA 94710

East Bay Hills Environmental Impact Statement Comments
P.O. Box 72379
Oakland, CA 94612-8579

Ladies and gentlemen,

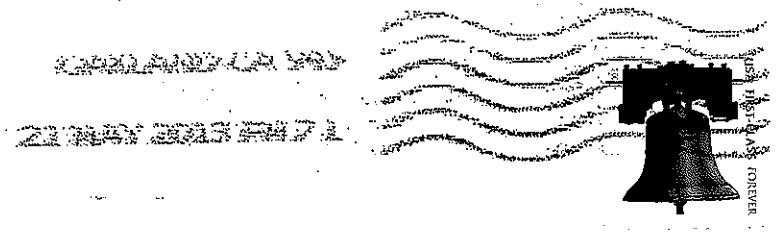
The current East Bay Hills EIS draft is unacceptable. It fails to adequately represent the long term effects, both currently known and not yet known, of introducing thousands of gallons of herbicides into our local ecosystem. I am especially concerned about the effects of triclopyr and trichloropyridinol (from Garlon 3A and Garlon 4) on children and animals.

I urge you to see that this EIS is retracted and that any revision or replacement warn against the use of herbicides in this project.

Thank you for your attention in this matter.

Forest Wilkinson
East Bay Resident

Forest Wilkinson
1436 8th st
Berkeley, CA 94710-1416



East Bay Hills EIS Comments
P.O. Box 72379
Oakland, CA 94612-8579

94612857979

John and Judith Ratcliffe
470 Panoramic Way,
Berkeley, CA 94704

May 20, 2013

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

Re: Support of EIS for East Bay Hills

Dear FEMA:

We strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel they have been studied quite long enough – we believe the EIS findings and recommendations of improved fire safety should move forward without further delay.

We Panoramic Hill residents are quite well aware that, when ignited, the eucalyptus and Monterey Pines can spread wildfire dramatically during our windy fire season. While we love trees and will miss their aesthetic, as survivors of the 1991 East Bay Hills fire, we are well aware that life and safety come first.

Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,

John Ratcliffe & Judith Ratcliffe

John and Judith Ratcliffe

Ratcliffe
470 Panoramic Way
Berkeley,
CA. 94704

OAKLAND CA 945
21 MAY 2013 PM 3 L

Fema
P.O. Box 72379
Oakland,
CA 94612-8579

94612857979

542_Ratcliffe_John&Judith

May 21, 2013

FEMA
Oakland , CA

Dear FEMA,
I am very opposed to the proposal of UCB and the Regional Parks to cut thousands of Eucalyptus and Monterey Pines trees in the Strawberry and Claremont Canyons here in Berkeley. I am 74 years old and have been in Berkeley since 1968. I am a walker and a hiker and these areas are dear to me. The trees are an integral part of the ecology in this place and such a slaughter would be devastating to the wildlife who live in and around them. We would all like native plants and trees to make a come back but this is NOT the way. Nature deserves respect and a gentle approach to change.

PLEASE DO NOT APPROVE this proposal by UCB and the Regional Parks. The people of this area do not want such a heavy handed measure.

Thank you for your consideration. The public hearing was given on such short notice many of us did not get a chance to come.

Sincerely,

Sallie Hanna-Rhyne

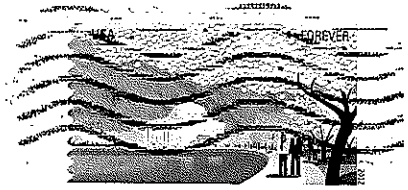
Sallie Hanna-Rhyne
2120 Woolsey
Berkeley, CA 94705

YOSEMITE CONSERVANCY

Sallie Hanna-Rhyne
2120 Woolsey St
Berkeley, CA 94705

OAKLAND CA 94

21 MAY 2013 PM 6 L



FEMA
P.O. Box 72379
Oakland
CA 94612

94612857979

Submitted for the EIS hearings by FEMA – May 14, 18, 2013 – by the Claremont Canyon Conservancy.

L T Wallace,
President of the CCC

L. Tim Wallace, President
Claremont Canyon Conservancy

Jonathan Ball, Esq.
BALL LAW CORPORATION
One Market
Spear Tower, 36th Floor
San Francisco, CA 94105

May 18, 2013

Re: Cost Analysis of Proposed HCN Settlement

Dear Jonathan:

I am writing you at your request to estimate, conservatively, the cost difference between what the Parks field staff might find in carrying out the demands made by HCN from those if the original 2010 Parks Plan guidelines were followed. The HCN demands affect approximately 75 acres, leaving some 1,200 acres still to be managed by the Parks under the 2010 Plan guidelines.

I have been in agriculture all my life, first as a rancher and logger (felling and bucking for a portable mill), and have been involved with forestry all my adult life. My formal training is in economics (Harvard, Oregon State University and Purdue), and I have served as an Extension Economist at UCBerkeley from 1963-97, with leaves to work on the President's Council of Economic Advisors as senior economist for agriculture (1968-69), and as Director of California's Department of Food and Agriculture (1975-76).

The assumptions by which I did this estimate are only in 2011 dollars since the study is for purposes of establishing the relative difference between acreage guided by the proposed Parks/HCN agreement and what the Parks would normally consider adequate treatment - to which we agreed under the 2010 Plan. Data were drawn from actual cost accounting on eucalyptus cutting/maintaining projects within the last five years, and from talks with contractors who have done similar work on projects within that same time period.

Let's begin with the estimated costs of handling the 75 acres under "normal" Parks efforts re their 2010 Plan. Starting with the initial treatment of cutting eucalyptus, the cost data were taken from actual costs on UC grounds, similar and adjacent to euc-covered Park acreage. The average cost is $6,000 per acre. Annual maintenance (pulling volunteer plants, etc.) would be approximately $100 per acre per year, for a total of $2,000 per acre for the term of the 20-year proposed agreement with HCN. This amounts to a total of $8,000 per acre for the

20-year period. The total for 2010 Plan treatment would thus be some $600,000 for all 75 acres over the 20-year period.

Looking now toward accommodating the HCN/Parks settlement guidelines, the land would initially have to be cleared of the downfall that has accumulated since the 1991 fire. Downfall of strip bark, fallen branches, brush growth and dense stands of poison oak would require, for each acre, a 4-person team (contractor's price of $60 per person per hour which includes benefits, workman's compensation insurance, portal to portal travel time etc.), and a hauling vehicle (dump truck costing $45/hour) for one week of 8-hour days. Those costs add up to $11,400 per acre. For 75 acres that total is $855,000.

To maintain those 75 acres, assuming an annual downfall of 3-6 tons per acre per year (taken from both California and Australian data sources), it would require that same 4-person team and vehicle two days every five years. This amounts to $4,560 every five years for each of the 75 acres. Four clean-up trips are assumed desirable to keep up with the 15-30 tons dropped during each 5 year period of the 20-year period covered by the proposed agreement. Clean-up costs for the full 20-year period would amount to $18,240 per acre, or a total of $1,368,000 for all 75 acres.

The total for the HCN agreed-to guidelines would be $855,000 for the initial clearing plus $1,368,000 for the recurring clean-ups - for a total cost of $2,223,000. On a per-acre cost comparison, the difference is $21,640 per acre: $8,000 per acre under the 2010 Plan guidelines versus $29,640 per acre under the proposed settlement.

The total difference between the "normal" 2010 Plan guidelines and the HCN preferred guidelines for the 75 acres involved is thus $1,623,000 - a public cost increase which is not only unnecessary, but also counter-productive. It is needlessly spent on complying with a proposed agreement which wastes taxpayer dollars, increases fire risk, harms with habitat, and isolates a small group of eight people for special treatment in the management of a public park. Further, this cost is locked into perpetuity. Not "fair".

Sincerely,

L Tim Wallace

L. Tim Wallace

Analysis of Costs of Proposed Settlement vs. Costs of 2010 Plan

	2010 Plan	Proposed Settlement	Additional Cost Due to Settlement
Initial Treatment Per Acre	$6,000	$11,400	$5,400
Initial Treatment For All 75 Affected Acres	$450,000	$855,000	$405,000
Recurring Maintenance Per Acre For 20 Years in 2011 Dollars	$2,000	$18,240	$16,320
Recurring Maintenance For All 75 Affected Acres For 20 Years in 2011 Dollars	$150,000	$1,368,000	$1,178,000
TOTAL: Initial Treatment plus Recurring Maintenance For All 75 Acres For 20 Years in 2011 Dollars	$600,000	$2,223,000	**$1,623,000**

From the Claremont Canyon Conservancy Newsletter Fall of 2011-12.
L.TW

The Eucalyptus and Pine Fire Hazard

In the early 1900s, blue gum and red gum eucalyptus were planted as random timber plantations in the East Bay Hills on private water company lands, with about 2,500 acres of groves remaining today under a variety of ownerships. The selection of these two trees for timber harvest turned out to be a major forestry and financial mistake leaving groves largely unmaintained over the past 100-years. Pine trees were planted by developers for residential projects, and by early park administrations to create forests on what were then viewed as "bare" hillsides. Eucalyptus and pine groves are now distinct features in the 20,000-acre mosaic of trees, shrubs, and grasslands covering undeveloped areas in the hills today.

Newspaper clips and old fire planning studies document an active and dangerous fire history in the hills, often describing the dramatic fire behavior in eucalyptus and pine groves. The recent Park District fire hazard reduction plan identified 1,500 acres of vegetation near homes that require ongoing management for fuelbreaks, and 1,000 acres of eucalyptus and 300 acres of pine requiring aggressive management in some locations and conversion to other safer plant communities on high ridges and slopes above homes.

Eucalyptus and pine forests were specifically identified as fire hazards because they are among the most flammable forests in the world when located in dry settings that are exposed to seasonal foehn-type winds. Local fire fighters would not be qualified or equipped to handle a wind driven eucalyptus of pine forest fire in our steep hills with few safe locations available for attempting to stop a fast moving fire in heavy fuels.

Any fall Diablo wind driven fire that reaches a dense eucalyptus or pine grove will quickly involve a lot of acreage with heavy fuel that is going to be alight at once and burn for a long time. This will create a monster convection column that will elevate everything including branches into the fire column with flames reaching 60 to 100 feet above treetops. The long ribbons of bark hanging off eucalyptus trunks, shaped like a box kite in cross section, get ignited, elevated in the convection column, transported long distances in the wind, and are still burning when they drop to earth later – still with active flames and fire brands and enough mass to ignite vegetation and rooftops where ever they land.

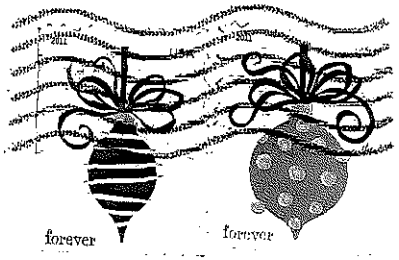
Blue gum eucalyptus and Monterey pine trees are forest trees that grow above 100 feet in height, and are characteristically found in the hills as unmaintained, dense, flammable groves. Fire hazard reduction plans recommend that these two forest trees in groves should not be retained on ridgetops or leeward slopes above homes. Diablo winds would likely fan any ground fire into tree crowns, even in thinned groves, creating the type of fire that would be impossible to control, throwing burning fire-brands and embers into vegetation on lower slopes, into unprepared residential areas igniting homes, and significantly reducing evacuation time for residents.

Some have advocated thinning and grove cleanup as a local solution for eucalyptus groves. However, expecting regular cleanup (every 3 to 5 years) of leaves, twigs and ribbon bark along with regular clearing of shrubs, seedlings, and other vegetation under 1,000 acres of eucalyptus or even 300 acres of pine is not a simple or even remotely conceivable task on our very steep hillsides. Today some groves contain up to 50 tons of flammable vegetation and ground litter with an annual renewal rate of about nine tons per year that would need to be cleared. It would not be realistic to expect Berkeley, Oakland, UC, or even the Park District to be able to fund annual cleanup for the next 100-years, even if it was humanly possible, under all eucalyptus and pine forests. Therefore, the Conservancy has advocated conversion of eucalyptus and pine forests in Claremont and Strawberry Canyons, that are on high ridges and leeward slopes above homes, to native woodlands or other native vegetation.

In Australia, the only significant fire hazard reduction program widely used is to burn natural eucalyptus forests on a five or ten year cycle. This is a controversial program even in many park and suburban areas, and not used successfully near urban areas. Australia has been burning their forests for the past 80-years, yet the major fires still occur in their flammable eucalyptus bushlands with devastating results.

L. T. Wallace
64 Oak Ridge Rd.
Berkeley, CA 94705

OAKLAND CA 945
15 MAY 2003 PM 3 L



EBH-EIS
P.O. Box 72379
Oakland
CA

94612-8579

Warren and Lorna Byrne
23 Panoramic Way
Berkeley, CA 94704
510 849-3474

May 16, 2013

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

Re: Strong support for the East Bay Hills EIS

Dear FEMA:

We urge you to approve, as is, the Environmental Impact Statement (EIS) for the removal of eucalyptus and other hazardous vegetation in the East Bay Hills.

This work has been delayed far to long. We must do what we can to diminish the danger of another catastrophic fire in the East Bay; the need is urgent because 2013 is such a dry year. Funding is available. Please approve the EIS as soon as possible.

Thank you for helping make the East Bay safer for everyone.

Sincerely,

Warren & Lorna Byrne

Warren and Lorna Byrne
23 Panoramic Way
Berkeley CA 94704-1827

I SUPPORT THE EAST BAY SPCA

OAKLAND CA 945
17 MAY 2013 PM 8 L

FEMA
PO Box 72379
Oakland, CA 94612-8579

East Bay Hills EIS 94612857979

2934 Magnolia Street
Berkeley, CA. 94705

May 16, 2013

FEMA
P.O. Box 72379
Oakland, CA. 94612-8579

Dear FEMA:

I am writing to support the wildfire hazard mitigation projects for the East bay Hills. I am a resident of Berkeley who lives downhill from the 1991 fire area and evacuated my home at that time due to the escalating fire danger. I hike frequently in this area and find that the area which has been cleared and replanted areas along Claremont Canyon is a wonderful, native plant, welcome change to this area.

The eucalyptus in our area are not native (they come from Australia). They have no commercial value as their wood is too hard. They are dangerous and a nuisance for those who live near them, due to the leaves, nuts, branches and other litter that drops that prevent other plants from thriving and are very difficult to control. Most importantly, they are a significant fuel source for wild fires due to the oils and their blowing debris. Native California redwoods are much less dangerous, more fire resistant and fast growing as anyone can observe from the stance planted several years ago to replace the eucalyptus along the south side of Claremont Canyon.

Please support this important work and approve the EIS as soon as possible. This much needed project has dragged on for ten years as you know and we are now facing another drought summer in this area as fire season approaches.

Very truly yours,

Samuela A Evans

Samuela A. Evans

Samuela Evans
2934 Magnolia St
Berkeley, CA 94705

OAKLAND CA 945
17 MAY 2013 PM 5 L

USA FIRST-CLASS FOREVER

FEMA
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94612857979

LAW
OFFICES
OF
WILLIAM
A. FALIK

A PROFESSIONAL
CORPORATION

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May 16, 2013

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

RE: Support of EIS for East Bay Hills

Dear FEMA:

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term enhancement to the land should move forward without delay. We were one block away from losing our home in the last catastrophic fire, and measures must be taken to see that our community does not face another similar disaster.

We Claremont Canyon residents know only too well that when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive.

Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,

William A. Falik

William A. Falik

Bill Falik
100 Tunnel Rd.
Berkeley, CA 94705-2829

OAKLAND CA 945
27 MAR 2013 PM 4 L

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547_Falik_William

Joan Baylie
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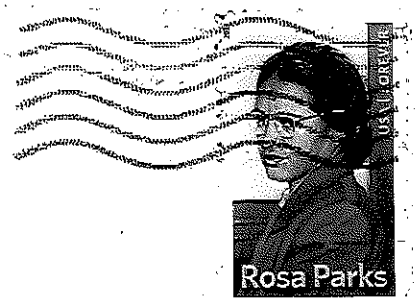
01 JUN 2013 PM 3 L



FEMA Representative
P.O. Box 72379
Oakland, CA. 94612

94612857979

556_Mullins_Baylie_James_Jean

FEMA

May 31, 2013

It sickens and disheartens my family and me that you are even considering the removal of 85,000 trees from the East Bay hills. The previous removal of over 24,000 trees was very difficult to witness. The above project, if approved, will certainly devastate the area. There were serious regrets for the removal of trees on Angel Island. Won't anyone read the facts. There are grave consequences for the environment and wildlife. If you insist on leaving only oak trees that will only increase the spread of sudden oak death, then we will be left with nothing.

Pat Thompson, Dan Thompson

Pat and Dan Thompson

40 year residents of Montclair District

5757 Balboa Drive
Oakland, CA 94611

Task force report confirms trees are not a primary fire hazard

DAVID MALONEY
My Word

I RETIRED FROM the Oakland Fire Department in 1988. In 1989, I began working for the Department of Defense as chief of fire prevention at the Oakland Army Base. In 1991, I was appointed to the Oakland-Berkeley Mayors' Firestorm Task Force. Our job was to investigate the causes of the 1991 Hill's Fire and make recommendations to prevent its recurrence.

The conclusion of the Task Force Report was that the spread of the fire was mostly due to the radiant heat generated by burning houses. A burning house has a sustained radiant heat transmission of 2500 to 3000 degrees Fahrenheit. The spread of the fire was not due primarily to burning trees — whether eucalyptus or any other species.

The July 17 article ("Hills fire prevention not clear cut") failed to mention another crucial fact. There are two species of eucalyptus that predominate in the East Bay Hills: The blue gum, which is highly fire resistant, and the dwarf blue gum.

The two characteristics that determine the fire resistance of any tree are how high from the ground its branches begin and the thickness of the tree's bark. The blue gum has a very thick bark, which enables it to withstand fire, and its branches begin about 25 feet from the ground, which means a ground fire will blow past it without catching its leaves on fire. A beautiful example of the blue gum is the copse of trees on that part of the University of California campus that is close to Oxford Avenue.

The dwarf blue gum is different. It has a thick bark but its branches are low to the ground. A ground fire will transmit relatively easily to its leaves, thereby causing the tree to burn. Many native California trees, such as oak, also have branches low to the ground.

In the late 1990s, the federal government clear cut blue gum eucalyptus from Angel Island. The beautiful eucalyptus canopies, which provided shaded avenues for countless hikers and bikers, were replaced by grass, brush and shrubs.

In 2008, the worst fire in modern Angel Island history occurred. It consumed 400 of the island's 740 acres. It burned much of the grass, brush and shrubs that took the place of the clear cut eucalyptus, pouring smoke all over southern Marin County.

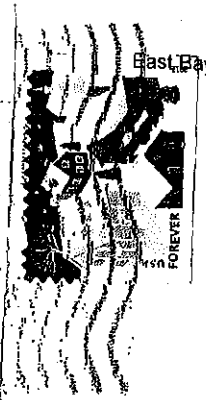
Blue gum eucalyptus is a dominate species. It precludes grass, brush and shrubs from growing around it. If the blue gum eucalyptus had not been cut down, the grass, brush and shrubs could not have survived, and the fire would not have been as extensive as it was.

My experience on the task force was that many people who wanted only native California plants and trees on our hillsides were seemingly deliberately ignoring the facts of the major cause of the fire, and the difference between the blue gum and dwarf blue gum.

The Hills Conservation Network is correct in its position of supporting thinning out the wooded areas of the East Bay Hills. It would be a waste of taxpayers' money to clear cut the East Bay Hills of trees that are highly fire resistant, and it could lead to another devastating fire.

Because of our conclusions, new fire prevention codes relative to housing construction were promulgated by the state and various cities throughout California. No new fire codes were promulgated relative to the species of trees that would populate the East Bay hills.

David Maloney now lives in San Francisco.



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Peter Gray Scott
architect

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RECEIVED
JUN 11 2013
BY:_____

FAX to FEMA (510 627 7147)

17 pages including cover

10 June 2013

Re: Comments concerning the EIS, Hazardous Fire Risk Reduction,

East Bay Hills

1

Peter Gray Scott
architect

1047 Alvarado Road
Berkeley, California 94705
Phone or Fax 510•843•3082

FEMA **9 June 2013**

P.O.Box 72397

Oakland, Ca 94612-8579

Re: EIS, Hazardous Fire Risk Reduction

East Bay Hills

I am writing in **support** of the EIS **with modifications.**

The EIS as written has major flaws, however – as a survivor of both the 1970 and 1991 fires in the hills – I am strongly in favor of reducing the risk of fire and ignition. The problem with the EIS as it stands is that it will *increase,* rather than reduce risk; this is particularly true of UC's proposal, and potentially true of Oakland's proposal, depending on clarification. Certainly UC's protocol must be modified, or deleted.

I am a charter member of the Claremont Canyon Conservancy (CCC), and although it claims to speak for the whole of its membership, it certainly does not speak for me and many others.

I have studied the issues extensively, talked with fire experts, and at the end of this comment, I will propose a detailed **ALTERNATIVE.** My alternative is not very different from EBRPD's proposed treatments, and if UC and Oakland are simply required to conform to EBRPD's specifications, that would be a worthy outcome.

Following the 1991 "Tunnel Fire," my wife and I instigated the **Grand Jury Investigation** of that fire. Following Tom Klatt's (UC) initial project in Claremont Canyon, across the canyon from our rebuilt home, we were sufficiently outraged that we joined in forming the Hills Conservation Network (HCN). I participated in negotiations with Asst Fire Chief John Swanson concerning modifications to EBRPD's ten-year wildfire hazard mitigation plan, and I've conferred with the Hills Emergency Forum.

As written in the EIS, Oakland's proposed treatment appears to be the same as UC's, but when I challenged Asst Chief Leroy Griffin on this point, he said to me "No, we're not doing that. We would not be crazy enough to do what Tom Klatt is doing." But until I see that assurance in writing, my comments about UC's plan will have to apply to Oakland's as well.

Comment #1: As residents of the East Bay hills, and fire survivors, we support efforts to reduce the risk of ignition and fire in the wildland-urban interface (WUI). Based on factual evidence, expert advice and extensive research, we believe that much of the currently proposed vegetation management projects in the EIS will not only *fail to reduce the risk, but will actually increase fire hazard in the hills*.

Comment #2: The EIS proposes to eliminate all alternative methodologies except "the proposed action" and "no action," essentially saying "take it or leave it." This is bizarre, since the basic purpose of an EIS is to explore and compare reasonable, viable alternatives -- *and reasonable, viable options DO exist.* However, **FEMA has explicitly stated that it can require modification [of the proposed actions] as a condition of funding, and "modification" -- by means of an *added alternative* -- is what we suggest.**

This is an EIS that cries out for an alternative to the proposed action, because, in addition to failing to reduce risk, the protocols proposed by UC and the City of Oakland are so prosaic and simplistic that they would inevitably involve brutal, unmitigated – and unnecessary -- damage to the environment. In addition, it does not make sense to propose two entirely different methodologies – EBRPD's and UC/Oakland's – to treat what is basically the same risk in similar environments.

Comment #3: The EIS, as written, presents a number of fundamental problems:

a. FEMA's Mitigation Policy MRR-2-08-1 lists "**Ineligible Wildfire Activities**." The list includes "projects to address ecological issues," "projects for prescribed burning or clear-cutting," and "projects for maintenance activities." Such ineligible actions are proposed by the EIS.

b. The stated intent of the actions proposed is to alter the vegetation so that its flame length characteristic is reduced to less than 8 feet. The proposed "treated" plant environment absolutely fails to achieve this goal, short term or long term. See pages 5 – 6.

c. Standards for adequacy of an EIS state: *disagreement among experts does not make an EIS inadequate, but the EIS should summarize the main points of disagreement among experts and make a **good faith effort at full disclosure.*** This EIS fails to meet this standard, most notably in its discussion of eucalyptus and "non-native" species. See pages 10 – 11.

d. The EIS cites numerous studies and informed recommendations as support for its proposed methodology, but then proposes actions that are *clearly not what those studies and recommendations said.* For example, the EIS claims support of the Hills Emergency Forum (HEF) but proposes treatments that are contrary to its recommendations; the EIS bibliography lists the Vesta Project as a reference, but incorporates *none* of its important fire behavior information. See pages 8 – 9.

e. Much of the proposed methodology is similar to vegetation management projects already completed in the East Bay hills, but the EIS ignores or misstates **negative outcomes** of those projects. We can readily see for ourselves that those "treated" environments have destroyed habitat, and created dried-out, eroded, weedy blighted areas; they are not more fire safe, and still have undecomposed chips on the ground after more than five years.

Comment #4: The EIS fails to respond to comments submitted following the UC's EA, fails to respond to comments in the November, 2010 Scoping Report, and fails to comply with specific and detailed

directions provided by FEMA to UC and the City of Oakland in April and November, 2008, and February 2009.

The primary reason FEMA required the EIS was that *UC was refusing to respond to fundamental questions* concerning the viability of the actions proposed in its EA, such as: *Will the treated environment be more fire safe than the environment it replaces? How will the replacement vegetation be created and maintained?* FEMA needed to be assured that UC's project would, in fact, reduce fire risk, and not be just a "native plant restoration," which FEMA is not allowed to fund. UC has been obdurate and unresponsive: its methodology in the current EIS is essentially unchanged from its original proposal, conceived nearly ten years ago.

Comment #5: In general terms, we endorse EBRPD's proposed actions because:

- the development process for its plan was more thorough and sophisticated (alternatives were considered)
- the plan was improved during its development, in response to comments and input
- the environmental impacts will be smaller
- the actions more closely follow the recommendations of fire experts – so the project has a chance of actually reducing the risk of fire. See pages 3 - 4.

****

Reducing potential vegetation fuel

The fundamental premise of the proposed vegetation management is that **reducing the quantity of fuel** (fuel load) in the wildland will reduce the risk of fire, and reduce the severity of the fire. The question is, **what type of fuel should be the target of the reduction**? This is what the experts say:

> (Hills Emergency Forum) *"Grassland flames can reach lengths ranging from 12' to 38' that could overwhelm suppression forces. The more critical concern for this vegetation type is the rate at which **grassland fires can spread and the ease of ignition.** This is one of the most dangerous types of fires . . .*
>
> (Hills Emergency Forum) *"All **brush** communities have fire behavior and flame lengths of 14'. North mixed chaparral and dry North coast scrub can reach **flames in excess of 69'**.*
>
> (Hills Emergency Forum) *"None of the pine forest plantations currently represent a hazard as far as flame lengths and crowning are concerned. Monterey Pine forests in the study area are not essential for any known species of special concern (sic) that would suggest special management requirements. Aesthetically however, these forests are dominant in the landscape, with strong community support . . . It is important to **maintain canopy closure** where possible to reduce invasive species after treatment. It is anticipated that treatment may occur on a 3 to 5 year basis.*

(Hills Emergency Forum) *"The forests with closed canopies and relatively little surface fuels represent **very low hazards**. Ignition potential is moderate . . .*

(Hills Emergency Forum) *"[Eucalyptus] ignition potential . . . is directly related to the depth of **litter** and amount of **dead materials on the ground**. It is anticipated that eucalyptus forest will need [ground fuel] treatment every 2 to 3 years."*

(Carole Rice) *"**Surface fuels are key** to understanding fire hazard potential.* (reference: MacKenzie (Stine), 2005)

(Carole Rice) *"Discussion of crown fuels, along with removal of dominant and co-dominant trees rather than surface fuels is a **faulty** direction and target.*

(Carole Rice) *"There is **little justification** in terms of fire hazard reduction for targeting larger trees.*

(Carole Rice) *"The desired crown bulk density could be achieved by taking more trees of **smaller** diameter."*

(Carole Rice) *"The focus of treatment should be on **surface fuels** rather than crown fuels.* (reference: Agee & Skinner, 2005)

(Carole Rice) *"The linkage between large trees (over 12" DBH) and fire hazard is **not based on science.***

(Carole Rice) *"Several arguments counter that specified fuel objectives can be reached through treating **surface fuels**, then **ladder fuels**.*

(Carole Rice) *"Where thinning is followed by sufficient treatment of **surface fuels**, the overall reduction in expected fire behavior and fire severity usually outweighs the changes in fire weather factors such as wind and fuel moisture.* (reference: Weatherspoon, 1996)

(Carole Rice) *"Reducing crown bulk density in these stands with crown thinning alone **did not** substantially change potential fire behavior or effects.* (reference: Graham et al, 2004)

(Carole Rice) *"Intense **surface** fires are necessary to maintain a crown fire.*

(Project Vesta) *"There is very little published data to demonstrate a direct relationship between rate of spread and **fuel load**. . . .their relationships were obtained from fires of very low intensity and there is little evidence to suggest that this relationship holds true for fires of high intensity.*

(Project Vesta) ***"Surface fuel layer** – leaf, twig and bark of the overstory and understory plants . . . this layer usually makes up the bulk of the fuel consumed and provides the most energy released by the fire.*

(Project Vesta) *"This result supports the proposition that the **near surface fuel** contributes strongly to the length of flames and . . . is the layer having the most influence on fire spread. The*

relationship between surface fuel load and rate of spread has been accepted in previous fire behavior guides. (reference: MacArthur 1962, 1967; Peet 1965; Sneeuwjagt & Peet 1985, 1988)

(Project Vesta) *"A smooth-barked eucalypt has a Fuel Hazard Score of **zero**."*

(FEMA / OES) *"Resist the urge to clear or do anything radical. **Maintain canopy** closure to reduce weed invasion."*

(Sandy Kerr) *"Wildfire danger of eucalyptus sprouts is **overrated** – they are green.*

(Sandy Kerr) *"Conversion to **grassland** is a mistake; it dries out in the high fire season, so becomes a higher fuel load.*

(Sandy Kerr) *"Heavier fuel cannot be ignited unless fine fuels are present; therefore fuel reduction is typically managed with **lighter fuels**.*

(Sandy Kerr) *"At equal windspeed, **grass fires** spread ten times faster than forest fires."*

Summary: The consensus among these experts is strong: the most effective fuel reduction to reduce fire ignition, fire intensity and fire spread, and to avoid crown fires, is to reduce flashy **grass fuel, ground fuel and ladder fuel**, especially fine and dry fuel. If simply reducing the "fuel load" is the goal, taking out the large trees might superficially appear to be the most direct solution . . . but that won't reduce risk, and it ignores the facts that large trees are difficult to ignite, and even when they "burn," **less than half of the tree-fuel** is actually consumed.

Clearly, UC's and Oakland's proposed action to cut up and scatter tree limbs on the site is insane: it increases the likelihood and probable severity of a fire, since it adds to the ground fuel and dry fine fuel. Similarly, trees with **low-hanging limbs** – bays, acacia and madrone, for example -- provide a built-in fire ladder.

****

Flame length

The flame lengths for various vegetation types are listed in the 1995 Vegetation Management Consortium (VMC) report, and repeated in the EIS. The estimated lengths are generalized and approximate because each vegetation type is a mix of species, and much depends on specific environmental conditions. However, the EIS states that it assumes a *wildfire condition, with a 22mph wind, and ignition during the hot, dry autumn fire season*, so we can expect the flame lengths would approach the high end of the range.

Grasslands: short grass flame length 2' – 10'; tall grass 12' – 38'; ignition potential: "most extreme hazard rating"

North coastal scrub: wet flame length 14' – 32'; dry flame length 14' – 69'; ignition potential: high hazard

Successional scrub (includes oaks and bays): flame length 14' – 32'; ignition potential: high hazard

Exotic shrubs (broom, acacia): flame length 15' – 18'; ignition potential: moderate

Mature eucalyptus forest (7' spacing): flame length 6' – 21'; ignition potential of litter: highest hazard; ignition potential of tree and leaves: not listed

Second growth eucalyptus (1-5 year old) forest: flame length 7' – 31'; ignition potential of litter: highest hazard; ignition potential of trees and leaves: not listed

Monterey pine forest: flame length 2' – 16'; ignition potential: highest hazard

Mixed Hardwood forest (70% canopy): flame length 1' – 34'; ignition potential: moderate

Redwood forest (75' – 150' tall): flame length 2' – 7'; ignition potential: low (excludes litter)

Riparian forest (bordering creeks): flame length 2' – 5'; ignition potential: low

The EIS is vague concerning the character of the plant environment following the proposed treatments, and it is also vague about what the schedule of maintenance would be. In forests, EBRPD plans to remove selected tall trees, and the treatments mention the development of the existing understory of oaks and bays; on open hillsides, EBRPD proposes grasslands with "islands" of brush, or "oak – bay savannahs." UC and Oakland propose clear-cutting tall trees, leaving who-knows-what for the future environment. *UC has no funding or plan for continuing maintenance.*

From this description, we would expect the post-treatment East Bay hills to be **a combination of grassland, North Coast scrub, successional scrub, mixed hardwood forest and, in some EBRPD areas, widely spaced eucs.** ***On a red flag day, the flame lengths in that environment will not meet the stated criteria of 8' maximum.***

VMC's recommendations for maintenance vary from yearly for grasslands, 2 – 3 year cycle for forests, and 5 – 7 year cycle for shrubs. EBRPD has plans and funds for maintenance, but do UC and Oakland?

The US Forest Service provides a chart rating the fire risk for a list of various wildland environments, comparing the risk *before* and *after* treatment. This chart is highly misleading because the "after treatment" rating is based on the conditions *the day after treatment.* **This is a fundamental error, and this is how the EIS can claim that the post-treatment flame length is less than 8'.** The "after treatment" rating *should* be based on the conditions *several years* after the treatment, when the surviving plants and trees have had a chance to develop. For instance, if there is a maintenance cycle for the regrown forest, the risk rating should be judged *the day before maintenance is due.*

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The EIS includes a "Chart ES-3, Summary of Potential Effects," that is intended to compare the environmental impacts of the proposed actions with the "no action" alternative. The "no action" comparisons repeatedly refer to the impact *if a wildfire occurred.* This is not a legitimate comparison. From AEP's 2009 EIR Guidelines: "The "no project" shall discuss the *existing* conditions at the time the notice of preparation is published . . ." and not be based on a speculative condition (fire). **If the assumption of a fire is in one alternative, it must be in both alternatives.** Given the flame length discussion above, a wildfire in the post-treatment environment would be just as disastrous, and have similar environmental impacts, as a wildfire in the "no action" environment.

****

Significant omissions

We note that the EIS fails to mention key environmental issues:

- Fog drip and humidity in the understory: these ignition-inhibiting factors depend on preservation of the canopy, which would argue for maintaining tall trees.

- Fuel, especially fine fuel, drying out in the high fire autumn season, increasing fire risk. This too argues for maintaining the evergreen shade of tall trees.

- Wind breaks: Diablo winds raking the East Bay ridges are certainly a factor in wildfires. We need windbreaks, yet the proposed actions include removing the tall trees from the ridgelines, based on theoretical and unsupported fears of ember casting (see p. 8 - 9).

- Sudden Oak Death (SOD): Conversion of the hills to an environment dominated by oaks and bays appears to be playing Russian roulette. With the disruption of vegetation management activities that encourages the spread, the disease-transmitting bays would have a perfect shot at the remaining oaks, and no one knows how to stop the spread. We've witnessed the SOD effect in the hills south of Carmel Valley, and it is not pretty. Grass, brush, bays and dead oaks is an ideal recipe for a disastrous conflagration.

- The logging and removal work proposed for Claremont Canyon includes three new 12' wide access roads, with switch-backs and turn-arounds, on the steep slopes of the canyon. The necessary earthwork, cuts and new retaining structures, would be major, yet the EIS provides no drawing, no performance specification, no discussion of erosion or aesthetic impact.

****

Fire behavior

In terms of the discussion of predicting fire behavior, we believe the EIS proposal to use FlamMap and BEHAVIOR is deficient, because they do not represent the latest and most appropriate prediction tools. They are based on **artificial tests and artificial (and incomplete) parameters.** The Project Vesta study would be a better source: Vesta appears in the EIS bibliography yet the EIS makes no reference to its findings. The reasons we favor Project Vesta are:

- It is a more recent study.
- It was performed in the field, with real fires (104 fires were set and observed in detail by experts) with real measurements and observations, rather than contrived experiments in a laboratory, with theoretical calculations.
- The test fires were conducted in eucalyptus groves.

****

Spotting potential

The EIS provides this justification for cutting tall trees: because of their height, they loft embers ahead of the fire front, spreading the fire. While there is no doubt spotting occurs during a WUI wildfire, identifying the tall trees as the source is not supported in the EIS by any evidence or scientific study. Typically, **firebrands are not released from the tops of trees:**

> (Project Vesta) *"Firebrands are flaming or glowing pieces of fuel, including fruit, cones, twigs or bark, that are transported ahead of the fire-front . . .the burning firebrand is entrained into and* ***lofted by the convection column*** *and then released at some height downwind . . . Most firebrands burn out within the convection column. A firebrand lofted within the convection column may be carried to a considerable height before falling out and descending to earth. If the burnout time of the firebrand is longer than its flight time, it will land alight a may start a spotfire. If its flight time is longer than its burnout time, it will not be alight when it lands and will not start a spotfire.*
>
> (Project Vesta) *"Most flakes of Jarrah (eucalyptus) bark appeared to be only 1 or 2 mm thick and, because they would burn out quickly, would probably be effective firebrands to* ***a few tens of meters.***
>
> (Project Vesta) *"All spot fires that did occur . . . were overrun by the main fire while they were small and* ***did not have any effect*** *in increasing the rate of spread of the main fire.*
>
> (Project Vesta) *"Lofting of firebrands is dependent on flame height, along with convection currents and velocity."*

In my own experiments with eucalyptus bark and leaves, this is what I discovered:

1. In response to claims that euc leaves are prone to flying significant distances because of their arrow-like shape, I tested leaves of various species in strong (fan-driven) winds, starting from both flat and suspended positions. The results: leaves that are lightweight and have a lot of surface area -- like tanoak or maple leaves -- fly furthest; needles hardly fly at all; the slightly boomerang-shaped euc leaves **spiral and flutter** around, and are just as likely to fly backwards.

2. Burnout time of a full-size green euc leaf is no more than 30 seconds (it tries to self extinguish) and shorter for a dry leaf (because it ignites more quickly) but in either case the residue is the frailest ash, not capable of staying intact, **much less flying anywhere.**

3. Burnout time for a 4" x 30" strip of bark was 54 seconds; the residue falls apart, but theoretically could have been capable of sustaining an ember for that period. Strips of bark are litter, usually on the ground or in the crotch of the tree, but not near the crown. If the bark lofted in the convection column for 20 seconds, then flew in a straight line in a 22 mph wind at 35% efficiency, its **range as a firebrand would be about 210'.** This data appears to confirm Project Vesta's findings ("a few tens of meters"), considering that a straight-line flight path is unlikely. This also disputes the claim in the EIS (5.2) that spotting from trees in 1991 reached 2000'.

The point is: these real, physical tests do not support claims that "tall trees" create spotting at great distances. Since, in the case of the 1991 Tunnel fire, the conflagration was primarily a structure fire, burning houses within the first ten minutes, *the long-distance spotting that occurred was actually caused by bits of* structures, *not trees*. In that WUI fire, the fire started in brush and quickly spread to houses; then the **homes set fire to the trees, not the other way 'round.**

A pilot of a fire-fighting aircraft reported seeing a flaming sheet of plywood 2000 feet in the air.

It should be noted that in the 1991 fire, the *only instance of crown fire in eucalyptus* was in the groves at the foot of Hiller Highlands, where the firestorm rolling down the hill was a full blown *structure* fire, consuming twenty times the fuel of a wildland fire, burning at a rate of a residence every 11 seconds. Elsewhere, tall trees **resisted crowning** while the understory burned past, leaving the tall eucalypts intact where everything else was consumed.

It is significant that in FEMA's 98 page report on the 1991 Tunnel fire, which includes a minute-by-minute recap of the fire's progress, *there is not a single mention of eucalyptus.*

In the Mayors' Task Force Report composed immediately after the 1991 Tunnel fire, the "Policy Recommendations" stated: ***"Do not target specific species, such as Blue Gum Eucalyptus or Monterey Pine for eradication*** *or exemption from tree regulation policies. Existing stands of pine and eucalyptus must be regularly maintained, and debris processed to substantially reduce susceptibility to fire."*

Two years later, in the VMC "Fire Hazard Mitigation Program and Fuel Management Plan for the East Bay Hills" (called "the most capable analysis of the fire problem"), the treatment for the Mature

Eucalyptus Forest recommended: *"Maintain canopy closure to prevent understory development; Management of fuel load:* ***Do not convert.*** *Manage as mature Eucalyptus grove to maintain fuel load and eliminate vertical continuity; Remove all trees under 12" DBH . . . "* These recommendations are to some degree incorporated into EBRPD's proposed methodology, but are completely ignored in UC's and Oakland's protocol.

EBRPD's proposed actions also employ "selective" logging rather than clear-cutting or eradication. EBRPD will: cut the low-hanging limbs, reduce small (ladder) fuels, limit the chips on site to 4"-6" and remove the logging debris from the site, and protect streams; UC and Oakland should **incorporate these actions** into their plans.

****

Eucalyptus forest

The lesson of the Angel Island fire: Prior to 1996, in recorded history, Angel Island had never had a wildfire. The 740 acre island had a healthy 86-acre eucalyptus forest with trees up to a century old. In '96, all but 6 acres of the eucs were removed. **Did the clear cut make the island more fire safe?** Fires broke out in '04 and '05, and then, in October '08, a massive 304-acre wildfire swept over the slopes where the euc forest had been. What refused to burn? *The six acres of remaining eucs!*

Historically, the old evergreen forest had protected the island by intercepting the bay fog, providing a cool and moist understory; the brush and grass that replaced the trees was far more susceptible to ignition and wildfire. The Angel Island conflagration should be a lesson and **an embarrassment to advocates of deforestation** in the name of fire prevention.

Similarly, the 1991 Tunnel fire and the later Broadway Terrace fire should have informed the community about the **fire-resistance** of eucalypts. Because the bark and evergreen leaves are difficult to ignite, because there are few low-hanging limbs, the fire typically swept past the trees in the understory, leaving the lower trunks only superficially charred. Tall eucs survived where everything else – oaks, bays, houses, cars – burned. Eucs were nowhere near the ignition of the '91 fire, yet the Press and some poorly informed people erroneously clung to the myth that eucs were to blame.

> "As we have already seen, many trees are highly fireproof, like redwoods and eucalypts . . . "
> (The Tree, A Natural History of What Trees Are; Colin Tudge, 2006)

One of the persistent myths is that eucs "explode," implying that they shatter and send flaming bits in all directions. The fact, described in Colin Tudge's book: when eucs are heated, they **outgas** a fine oil vapor, and at a certain temperature that vapor *flares* . . . but the tree doesn't come apart or even necessarily ignite. It is far less dangerous than the torching of a bay or pine, for that does consume the tree and send embers flying.

We discuss the myths because the EIS frequently refers to eucalypts as "fire-prone," "fire-promoting" or "flammable." No scientific evidence or credible study is presented in the EIS to support this assertion. A careful reading of published comparative fire ratings – the US Forest Service's, for instance – reveals that the euc's fire rating concerns the **litter on the ground, not the tree itself.** Yet the litter under oaks and bays is not included in oak / bay fire ratings or discussed in the EIS. It should be . . .

> From "Managing Fire in Oak Savannahs" (Savannah Oak Foundation): *"Oak leaves and litter burn much more readily than litter and leaves of other hardwoods . . . tend to be drier than other hardwood species, making them more flammable. Oak leaves curl more than other hardwoods'. This puts the fire up off the ground making it capable of spreading more effectively. Thus oak leaves are more flammable and* ***more capable of 'carrying' a fire****. Oak leaves are thicker . . . giving them greater resistance to decomposition and longer life spans in the leaf litter. Oak leaves contain tannin which makes them more resistant to decay . . . thus the amount of burnable material on the oak forest floor is greater than that of other tree species."*
>
> Bay laurel leaves contain twice as much oil as euc leaves. That's why we cook with them.
>
> *"Despite the presence of volatile oils that can produce a hot fire, leaves of blue gum eucalyptus are* ***classed as intermediate*** *in fire resistance when green, and juvenile leaves are highly resistant to flaming."* ("Eucalyptus" - National Park Service)

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Native plants and fire

All of the proposed methodologies described in the EIS include removal of "non-native" species and "conversion" of the plant environment to "native." **Consideration of "native" or "non-native" should have no place** in a project intended to reduce the risk of fire, for several reasons:

1. "Native" is not a scientific descriptor. It is subjective and arbitrary; it is a **political** term employed to define approved or "good" plants v. non-approved or "bad" plants.

2. "Native" (or not) has **nothing to do with reducing the risk of ignition and fire**. "Good" species like bays, poison oak, madrone, buckwheat and baccaris are just as flammable as "bad" species like eucalyptus or acacia. From a fire's standpoint, fuel is fuel. *"There is no consensus on the flammability of many plants, even the species recommended as fire resistant."* (VMC, Fire Hazard Mitigation Program, 1995)

3. Consideration of "native" species **has no business in an EIS based on fire mitigation** potentially funded by FEMA, because FEMA, by its own policy, *is not permitted* to fund conversion or restoration of the plant environment. If the "native"-related work were purged from the EIS, which it should be, there wouldn't be much left of UC's and Oakland's proposals.

4. If the proposed plant environments ("Native forest of bay, oak, maple, buckeye, hazelnut;" "brush and grassland;" "annual grassland and north coastal scrub;" "coyote brush and sage;" "successional grassland") would, in fact, be less prone to ignition and fire, the "conversion" might be defensible . . . but that is clearly not the case. Every one of those environments is the type that **promotes surface fuel and near-surface fuel,** the very conditions that the experts say promotes fire spread and fire intensity. As one expert said: *"This is just trading one fire environment for another."*

   The converted environment would produce fires that ignite quicker, burn hotter, travel and change direction faster, and occur far more frequently. The statement in the EIS that "the oak-bay savannah is at the low end" of the fire rating scale is unsupported and untrue. Historians note that when the East Bay hills were the "oak - bay savannahs" of centuries ago, **fires ripped through the hills nearly every year** – compared to 20-plus year intervals now.
   The EIS also includes statements that have **no basis in fact,** such as: the native plant environment will have "less fuel," and will be more fire resistant because it is "naturally healthier . . . "

5. Clearly, the inclusion of the "native" plant issue is the result of consistent, long-term lobbying by the **claque of nativists** – the Native Plant Society, a local Sierra Club leader, the Audubon Society -- who want to replant the hills. To some degree, the claque is encouraged by people who harbor a passionate, irrational hatred of eucalyptus. But to those of us who have gone through at least one conflagration, and have worked ever since to avoid another, their clamoring is insulting, ignorant and inappropriate.

6. The conversion proposals also claim that eucalypts are **"invasive."** This assertion is unsupported by evidence, studies or expert testimony, and the EIS avoids any discussion of whether "native" trees are invasive. This is not the "good faith" full disclosure the EIS is supposed to provide.

   > *"If the natural history record is incomplete,* ***there is no reliable ecological or biological method that can distinguish between aliens and natives.*** *Futhermore, it is unclear how long a species needs to be established in a location before it is considered native. Is a species "naturalized" in 100 years, 1000 years, or 10,000 years? The distinctions are* ***arbitrary and unscientific.***" (Jonah H. Peretti, U. California)
   >
   > *"What I find particularly depressing about the "native plants only" argument is that it ends up denying the inevitability of ecological change. Its underlying assumption is that the plant and animal communities that existed in North America before the Europeans arrived can and should be preserved. The fact that this pre-Columbian environment no longer exists – and* ***cannot be recreated*** *– does not seem to matter . . . Implicit in the proposals that call for the control and/or eradication of invasive species is the* ***assumption that the native species will return to dominance . . .*** *thereby restoring the*

> *"balance of nature" . . . [they] view succession as an orderly process leading to the establishment of a "climax" or steady-state community that, in the absence of disturbance, was capable of maintaining itself indefinitely. I refer to this as the* ***Disney version of ecology*** *. . ."* (Peter Del Tredici, Harvard, 2004)

The EIS refers the "emergence" of the oaks and bays, etc, following removal of the tall tree canopy, yet **no plan for planting or maintainance is presented.** Does this "emergence" automatically, magically happen? Is this, as the Harvard professor says, the Disney ecology? We know that the redwoods planted and carefully watered by the Claremont Canyon Conservancy have struggled, and the survival rate is low. This issue, how the post-treatment landscape would come into being and be sustained, was one of the questions following the EA to which UC never responded.

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Timing of treatments

The UC proposal states that "In general, work would be conducted from August through November . . ." Considering that **every major fire** in the hills since 1905 (except one in December that was caused by a downed power line) has occurred during the autumn months, *this sounds like a foolhardy idea.* It would be more prudent to complete work before September, during cool, foggy summer months and prior to the flashy fuel drying out.

Speaking of the sixteen previous fires, the EIS concerning the Strawberry and Claremont Canyon projects implied that those areas were at imminent risk because large fires had **repeatedly** burned there. This clearly untrue because the existing trees are at least 80 years old.

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Environmental impact / mitigation issues:

My comments above are focused on fire hazard issues, but the EIS should equally address environmental impact issues, with viable alternatives for mitigation of negative impacts. I'll let others more knowledgeable than me discuss the details, however I do have some observations. In general, the EIS underestimates impacts and, because it fails to explore viable alternatives, responds to each issue in a simplistic, take-it-or-leave-it fashion that merely confirms the only action presented.

- Herbicides: The proposed application actions fail to note that UC's current mode includes multiple unannounced *spray* applications, by uncertified labor, without posted warnings – to discourage weedy fuel that quickly grows after canopy is removed. This is contrary to the "best practices" promised by UC.
  Our alternative, because it cuts fewer tall trees, would reduce the amount of painted herbicide; and because it retains canopy, would reduce the need for sprayed herbicide.
  The EIS fails to mention that the proposed herbicides will reduce the fire resistance of the trees that remain.

- Habitat: The EIS pays much attention to endangered species, but is relatively silent concerning animal and bird life in the canopied forest. It fails to discuss secondary impacts, such as: when raptors are decimated, populations of their prey explode (rats, voles, snakes, rabbits, etc.)
- Water quality and runoff: The EIS does not adequately discuss herbicides' impact on ground water and creek / bay water quality, and its impact on humans / animals.
- Air quality and pollution absorption: Reducing the population of large trees will provide less absorption / filtering of urban air.
- Soils, erosion: Wholesale conversion from rooted trees to grass and brush will reduce soil stability, and will change the water table level. Leaving large cut-down trunks on the ground is not a recognized or effective erosion mitigation . . . and is truly ugly.
  The EIS failed to mention mitigation of the considerable earthwork required for a 12' wide road carved into the steep slopes of Claremont Canyon, "with switchbacks and turnarounds." This road is also a major aesthetic degradation.
- Carbon, global warming: This large, important and complicated subject is inadequately addressed, and completely distorted by the erroneous assumption of the effects of a supposed wildfire in the "no action" option.
- Aesthetic: The comparative photo views before and after cutting are completely inconclusive. The EIS emphasizes the views outward from the hills, but underestimates the short- and long-term aesthetic damage when looking toward the hills. The EIS fails to discuss the aesthetic degradation imposed on hikers and runners who use trail system through the forests.

Community support: The Claremont Canyon Conservancy has erroneously claimed widespread community support for the proposed deforestation, but the recent public hearings conducted by FEMA demonstrated there is considerable support for alternative treatments, or no treatment. The EIS should completely ignore the "support" of nativists – Native Plant Society, Sierra Club, Audubon Society – because theirs is a different agenda that does not relate to – and actually sabotages – fire risk mitigation.

The Alternate Treatment (proposed)

To reduce the risk of ignition and wildfire in the East Bay hills, all forested areas should be treated similarly, whether they are on EBRPD's property, or UC's or Oakland's. Plant and tree removal shall be species neutral.

The overall intent of the treatment is to reduce the fuel load, focusing on ground fuels, dead and dry fuels, and fine (less than 3") fuels -- the fuels most likely to ignite, most likely to spread the fire, most likely to cause long flame lengths, and most likely to cause crowning. Reduction of the tree fuel load shall be limited by the Guidelines listed below.

To discourage understory weed growth, and preserve humidity and cooler temperatures at near-ground levels, the existing tree canopy shall be mostly preserved.

To discourage erosion and preserve ground moisture, a 2" layer of duff will remain in place; otherwise all litter, dead vegetation and cuttings and downed trunks shall be removed from the site.

Ladder vegetation shall be removed: tree limbs up to 8' or 1/3 of height above the ground; remove closely spaced brush, shrubs and small trees; remove, dead wood on and in the trees that remain.

Trees that are too closely spaced (see guidelines) shall be removed. Dead trees shall be removed, except for a few selected snags that provide habitat for raptors, etc.

Guidelines for the post-treatment forest:

- Preserve a minimum of 70% of eucs over 24" DBH, 60% of pines and other species over 24" DBH
- Preserve a minimum of 50% of all trees between 12" and 24" DBH
- Preserve a minimum of 25% of all trees between 6" and 12" DBH
- Any tree less than 6"DBH may be cut, as necessary to avoid a fire ladder and provide for spacing
- Spacing: for trees over 12" DBH: 20' for eucs, 30' for pines and other species
- Fuelbreaks: all fuel removed except mowed or grazed 4" grass; width depends on topography

Viability and environmental impact:

- Compared to the treatments proposed in the EIS by UC and Oakland, the environmental impact of The Alternate Treatment will be dramatically reduced, primarily because the fuel to be removed is lighter and smaller scale, and because fewer large trees will be cut, trimmed and dragged across the site.
- The Alternate Treatment will require dramatically less application of herbicides, both immediately and long-term.
- The Alternate Treatment will involve dramatically less environmental impact in terms of soil disturbance and erosion, water and air pollution, noise, disruption of habitat, carbon release.
- The Alternate Treatment will be a more efficient use of funds, in terms of delivering more fire risk reduction per dollar.
- The Alternate Treatment will result in less dramatically aesthetic damage, short and long term.

Note that the **Alternate Treatment has already been successfully tested**, in 2009, by EBRPD at its mid-canyon site in Claremont Canyon. The following is the description of the treatment for a eucalyptus forest written by EBRPD Assistant Fire Chief John Swanson in August 2008:

"Phase 1:
a. Where they are a component of ladder fuels, we'll remove fallen branches and accessible dead foliage in tree canopies. We'll also break up any "jackpots" or concentrations of fallen branches

that could contribute to torching. We'll consider the need to remove dead foliage on the forest floor; however the existing ground cover may be needed to provide soil protection . . .

b. For most trees with a diameter of 6" or greater, we will remove tree limbs within 6 to 10 feet off the ground. We will also prune desirable retention trees less than 6" dbh up to a height not to exceed 1/3 of their total height.

c. We will evaluate trees less than 6" dbh for removal. Many will need to remain to meet the species diversity objective . . . Those we choose not to remove, we will prune as described . . .

d. Where they are a component of ladder fuels into desirable retention trees, we'll remove shrubs, chaparral, grasses and poison oak. We will evaluate the need to remove them elsewhere on the site.

e. We will consider the need to rake and remove ground debris from the steep slope immediately above Claremont Blvd after the tree removal there is complete. There may be considerable ground disturbance as a result of tree removal, and existing ground cover may be needed to protect soils from upcoming winter rains . . .

Immediately after completion of Phase 1, we will be pleased to walk through the site with you to discuss the next phase . . . "

The "next phase" consisted of selecting which of the remaining trees would be removed, based primarily on spacing and retention of canopy. In fact, other than along the edge of the Claremont roadway, **very few trees needed removal, so the environmental impacts and use of herbicides were minimized.**

Following the Claremont mid-canyon project, we requested an accounting of the cost of this treatment, because it was obvious that it was **far less expensive** than the standard methodology – for instance, compared to UC's treatments accomplished just up the road in Claremont and Gwin Canyons – but EBRPD has not released the figures. Mid-canyon phase one treatment was completed in a matter of days, without the need for logging roads or heavy equipment, and therefore required no erosion control. It was interesting that although the understory ground fuel (leaves and litter) under the eucalyptus had not been maintained, it was minimal (about 2" thick) and the EBRPD Fire Chief stated that he would not want any less of it because of potential erosion on the steep slopes.

****

End of comments

Signed: **Peter Gray Scott. dated**

RECEIVED
JUN 1 , 2013
BY:

June 2, 2013

18 Pearce Street
Petaluma, Ca.
94952

Dear People,

Remove those trees and you'll have greatly increased erosion potential. The understory you claim exists in a suppressed state will be destroyed by the overstory removal when large logs and brush is skidded to landings. There are other ways to reduce fire potential through removal of fuel ladders and reduction in debris on the ground using small skid steer loaders. The Park Service reduces stocking in Marin through repeated thinning going from 400 stems per acre to 100 stems acre. Complete eradication of the overstory is expensive and unnecessary. Thin out the stands carefully using methods that preserve and protect residual trees and you will reduce wildfire potential.

By the way the State Parks removed 90% of their eucalyptus on Angel Island and still had a very large wildfire burn a lot of the island. The fire burned with great intensity in the pyrophytic native chaparral and coastal sage scrub. Are you sure you won't be creating an "Angel Island Scenario" for the future in your East Bay Tree Removal Plan?

Don't spend money unwisely. Get your money to the state of Oklahoma and the Tri State areas of New York, Connecticut and New Jersey.

Sincerely,
Peter Ehrlich
Sonoma County, California

RECEIVED
JUN 11 2013
BY:

Karin Obal
776 65th Street
Oakland, CA 94609

June 6, 2013

FEMA - Public Comment
P.O. Box 72379
Oakland, CA 94612-8579.

Re: UC Berkeley/City of Oakland Deforestation request

EIS means Environmental Impact Statement, correct? I have seen quite a bit of view points on the request of UC Berkeley and City of Oakland and the request seems skewed and therefore the discussion is not complete.

I am concerned with the concept of leaving deforested trees, chipped, on the ground:

·I grew up when sawmills let their chips and sawdust smolder, smoking for years, filling the air of mountain valleys with fragrant smoke. I can imagine a smoldering coastal range filling our air with smoke and worries about something else sparking.

· Putting herbicides in such quantity at the top of a water shed begs for problems as those toxins denude the banks of streams going down & out to the bay! Imagine neighborhoods and property owners dealing with loss off bank stability and losing property as banks fall in the first heavy rains season. I can imagine damming and local flooding causing additional property damage. Who will take responsibility? Please confirm adequate emergency and litigation costs in the EIS.

· All the efforts of preventing toxics draining to the bay will be for naught as the runoff rolls into the bay killing marsh flora &fauna and leaving use with heavier loss of fingerlings and fish than we already have.

Did anyone talk of how much other wild life would be displaced by this?

· Native Bees, honeybees and Beekeepers have come to depend on the eucalyptus to prove nectar and pollen during the three death periods we have annually. Non-native honeybees transformed California from a ranching and hunting economy to an agricultural economy. JS Harbision, the first successful importer of honeybees to California, addressed the National Beekeepers Association on August 19 , 1903, and referred to the [importance of] ' red gum during mid-and late summer, for honey, and the blue gum and other varieties of Eucalyptus during the winter and spring for substance and increase, so that more of the later fine honey may be heart harvested"

Harbison urged beekeepers to plant their own bee pasture to improve their bee ranges. He told of his successful efforts seeding wild sages, especially black and white and

of the valuable investment of planting eucalyptus trees as a fuel producer and nectar plants. Something he had been advocating since November 1879.
Just how far back does anyone intend to go with the concept of "native" plants? Buckeye is toxic to humans and bees, it is not seen in the local fossil record as these lands were then submerged.

Even John Muir noted in the spring of 1882 that, "Only ten years ago, the Great Central Plain of California, during the months of March, April, and May, was one smooth, continuous bed of honey-bloom, . . ." ,natural and human actions have introduced new flora over the centuries, the concept of "native " species is a joke.

·With little knowledge of other animals to be affected, I can only guess at the displacement of deer, skunk, possum, squirrel, gophers and snakes as well as all kinds of birds into University and residential landscape and the upset that would cause.

Without tree roots, what will hold the soil if drought winds blow and, finally, if rains return?
Dust, smouldering chips, nothing to break the wind over the hills in either direction....what a mess!

The bottom line is, who will pay ?

I suggest a hard second look at ALL the environmental factors.

Sincerely,

Karin Obal

RECEIVED
JUN 11 2013
BY:

5 June, 2013

EBH-EIS-FEMA-RIX
PO Box 723379
Oakland, CA 94612-8579

I would like to take a minute to voice my concerns over the proposed clear cutting of nonnative trees and use of pesticides as a means to reduce the threat of wildfires in Strawberry Canyon and adjacent areas in the Oakland and Berkeley Hills.

My initial thoughts on this proposed plan is that it's very extreme. While I can understand the concern surrounding overgrown forested areas near homes, the UC Berkeley campus and research facilities, this recommended plan of action seems to ignore key features of sane, safe and sustainable forestry. The overly liberal use of pesticides, the apparent misunderstanding of how how forests and animals adapt to invasive species and the threat of erosion are the main points I'd like to address.

First, as far as the use of pesticides, I've read different figures regarding the amount of pesticides that will be used to prevent nonnative trees and brush from growing again. But the one thing these different figures have in common is that they are all absurdly high. Dumping tens to hundreds of thousands of gallons of herbicide in the proposed areas poses a grave threat to the wildlife who make their homes in these regions. Moreover, in an era where pesticide use has been proven to contribute to the massive loss of vital insect and amphibian populations and is being fiercely debated in other parts of the state and the country (i.e. the ongoing debate over the role of herbicides in the collapse of key bee colonies), this liberality with highly toxic chemicals seems very short sighted. The sheer numbers are mind numbing. Dumping these large amounts of herbicide could have larger unintended consequences affecting local animal and human food chains and industry in ways we cannot grasp at present.

Secondly, the plan to destroy nonnative species is in itself flawed, as it fails to account for how plant and animal species adapt to 'invasive' species over time. While in general I support conservation efforts to preserve and restore Native California plant and animal species, I also believe these efforts needed to be guided by reason. In the areas where the proposed tree removal will take place, plant and animal species have been adapting for at least a couple centuries. This change commenced with the advent of the first Spanish settlers and continues to this day. For the most part this adaptation has been a gradual process, working over long periods of time. Suddenly gutting the forest of nonnative trees and toxifying the forest to ensure their ultimate death would be a much more sudden and dramatic change that, again, could alter these tenuous ecosystems in ways we can't predict. More importantly, it would upset the balance adapting species have patiently pursued over the last couple centuries by destroying key habitats.

Lastly, the plan as it stands seems to assume that, once trees and plants are removed, the earth and soil will just of its own accord stay put. Forests and hillsides are in a constant state of flux, and it's often only the deep network of a healthy forest that

keeps a hillside from sliding. The plan as it stands would be like an architect deciding to suddenly rip up the foundations of a structure without any sort of contingency. We'd all agree that such a contractor had lost his mind. While this analogy may not play out in the short term, in the long term the proposed plan is essentially as crazy. Even the slight contingency written into the proposal doesn't seem to account for the fact that forests and hillsides are mobile, living entities and not static, and so take very little account of the possibilities of drastic erosion and hill slides over longer periods of time.

There's more I object to in the proposal but these are the salient points. I also firmly believe that all the objectives sought after - as far as reducing the danger of wild fires - could just as easily be obtained by more traditional forestry methods, without resorting to the mass destruction that herbicides would undoubtedly wreak upon these natural resources.

Thank you,

Sam Foster

June 4, 2013

RECEIVED
JUN 11 2013
BY:

East Bay Hills Hazardous Fire Risk Reduction Project
P.O. Box 72379
Oakland, CA 94612-8579

Hello,

I am writing to adamantly request you reconsider the proposed removal of some 85,000 trees from East Bay communities. My reasons for opposing it are many, some of which are:

1. Surely I do not have to remind the powers that be that one of the few mitigators of carbon that remain with us is trees. Wangari Matthai, my mentor, received the 2004 Nobel Peace Prize for her work on the planting of trees globally in this interest and would be appalled at this plan which does just the opposite.

2. At Wildcare Wildlife Hospital, we serve over 8,000 patients brought to us who are victims of human thoughtless and greed. I invite anyone to visit the hospital or any other wildlife facility, speak with professionals and inform themselves of the unspeakable destruction this plan will impose. Removing 85,000 trees abruptly will leave untold thousands of wild animals with whom we share this landscape homeless, those homes removed forever. In addition, we are in a migratory path with migrating birds depending on established landscapes.

3. Few informed citizens will feel comfortable with a plan to douse our communities with herbicides particularly at the scale recommended. Will you be living there with your children and domestic animals while this is being done for years?

Thank you for reconsidering this and for doing the right thing for all concerned. Return to the drawing board and present a plan for fire remediation that considers all parties affected please.

Respectfully,

Janine Boneparth
10 Liberty Dock
Sausalito, CA 94965
Wildcare Wildlife Hospital
San Rafael, CA 94901

RECEIVED
JUN 11 2013
BY:

Karin Obal
776 65th Street
Oakland, CA 94609

June 6, 2013

FEMA - Public Comment
P.O. Box 72379
Oakland, CA 94612-8579.

Re: UC Berkeley/City of Oakland Deforestation request

EIS means Environmental Impact Statement, correct? I have seen quite a bit of view points on the request of UC Berkeley and City of Oakland and the request seems skewed and therefore the discussion is not complete.

I am concerned with the concept of leaving deforested trees, chipped, on the ground:

·I grew up when sawmills let their chips and sawdust smolder, smoking for years, filling the air of mountain valleys with fragrant smoke. I can imagine a smoldering coastal range filling our air with smoke and worries about something else sparking.

· Putting herbicides in such quantity at the top of a water shed begs for problems as those toxins denude the banks of streams going down & out to the bay! Imagine neighborhoods and property owners dealing with loss off bank stability and losing property as banks fall in the first heavy rains season. I can imagine damming and local flooding causing additional property damage. Who will take responsibility? Please confirm adequate emergency and litigation costs in the EIS.

· All the efforts of preventing toxics draining to the bay will be for naught as the runoff rolls into the bay killing marsh flora &fauna and leaving use with heavier loss of fingerlings and fish than we already have.

Did anyone talk of how much other wild life would be displaced by this?

· Native Bees, honeybees and Beekeepers have come to depend on the eucalyptus to prove nectar and pollen during the three death periods we have annually. Non-native honeybees transformed California from a ranching and hunting economy to an agricultural economy. JS Harbision, the first successful importer of honeybees to California, addressed the National Beekeepers Association on August 19 , 1903, and referred to the [importance of] ' red gum during mid-and late summer, for honey, and the blue gum and other varieties of Eucalyptus during the winter and spring for substance and increase, so that more of the later fine honey may be heart harvested"

Harbison urged beekeepers to plant their own bee pasture to improve their bee ranges. He told of his successful efforts seeding wild sages, especially black and white and

Ellen Sirbu
2127 Braemar Road
Oakland, CA 94602
Phone 510-531-6843
June 14, 2013

JUN 17 2013
BY:

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

To Whom It May Concern:

It is extremely important that FEMA grants to remove the eucalyptus trees are approved. The eucalyptus trees are very dangerous as evidence by the 1991 hills wildfire.

I live on a street with massive eucalyptus trees. If they caught on fire, many lives just on our block could be lost. I would very much like FEMA to offer grants to homeowners for the removal of these trees. This would augment the work on public land and make the Berkeley and Oakland hills much safer.

Sincerely,

Ellen Sirbu
Co-Captain, Braemar Neighbors

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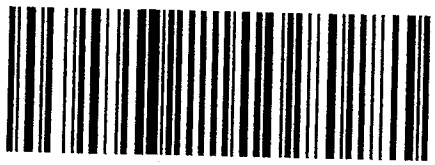

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595_McAllister_Mary_Keith

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JUN 14 2013
BY:

Public Comment
Draft Environmental Impact Statement
Hazardous Fire Risk Reduction – East Bay Hills

Introduction

This public comment will provide scientific and observational evidence that the proposed project will not reduce the risk of wildfire which is the stated purpose of the FEMA grants that would fund them. Furthermore, if these projects are implemented as described by the Draft Environmental Impact Statement (DEIS), they will significantly damage the environment. The comment is organized as follows:

- Part I: The proposed projects will increase the risk of wildfire in the East Bay Hills
- Part II: The proposed projects will damage the environment by significantly increasing the emission of greenhouse gases both immediately and for the long-term
- Part III: The proposed project will damage the environment by dousing public lands with thousands of gallons of toxic herbicides
- Part IV: The DEIS engages in advocacy for native plant restorations which is unsupported by scientific evidence
- Part V: Support for the No Project Alternative

The DEIS does not quantify the number of trees that will be destroyed by the proposed projects with the exception of three of the project areas on the property of UC Berkeley. Therefore, I must start by estimating the number of trees that will be removed so that we can quantify the impact of this project.

Project Area	Project Acreage	Estimated Tree Removals
UCB		
Strawberry Canyon	56.3	22,000
Claremont	42.8	
Frowning Ridge (in Oakland)	185.2	32,000
Sub-Total	284.3	54,000
Oakland		
North Hills Skyline	68.3	
Caldecott Tunnel	53.6	
Sub-Total	121.9	23,161*
East Bay Regional Park District		
Proposed Project	592.3	
Connected Action Project	1,060.7	
Sub-Total	1,653	409,176**
TOTAL	**2,059.2**	**486,337**

*UCB estimated tree removals are provided by the DEIS; Oakland estimated tree removals are extrapolated assuming the same number of trees per acre (54,000 ÷ 284.3 = 190 trees per acre X 121.9 acres = 23,161 trees removed by the projects of the City of Oakland)

**EBPRD Estimated Tree Removals: Neither the DEIS not EBRPD's "Wildfire Plan" provide an estimate of the number of trees they plan to destroy. Furthermore their plans for tree removals are complex and variable. All non-native trees (eucalypts, Monterey pines, acacia) will be removed in some recommended treatment areas, but in most they will be thinned to spacing of 25 to 35 feet. The final Environmental Impact Report for the "Wildfire Plan" provides an estimate of the existing tree density of existing eucalypts on EBRPD property (page 392). Acres of eucalypts in the entire project area are provided by the DEIS (page 4.2-6). Our estimate of tree removals is based on those figures.

I have tried to be as conservative as possible in making these estimates. They are based on what little information is provided by the DEIS and related documents. If they are far wrong, the DEIS has only itself to blame. Had the DEIS provided estimates of the number of tree removals, it would not have been necessary to calculate these estimates.

Part I: The proposed projects will increase the risk of wildfire in the East Bay Hills

Distributing tons of dead wood on the ground will increase the risk of fire

The University of California at Berkeley (UCB) and the City of Oakland propose to destroy all non-native trees (eucalyptus, Monterey pine, acacia, etc) on 406 acres of their land. Approximately 77,000 trees will be destroyed by UCB and Oakland, resulting in tons of dead wood. The DEIS tells us this wood will be distributed on the ground:

> *"Felled trees up to approximately 24 inches in diameter at breast height (DBH) would be cut up into chips 1 to 4 inches long and the chips would be spread on up to 20% of each site to a maximum depth of 24 inches...Branches from trees greater than 24 inches DBH would be cut up and scattered on the site (lopped and scattered)."* (DEIS, ES-10)

Any living plant or tree is less flammable than a dead plant because it contains more moisture. A living plant is therefore less likely to ignite than a dead plant. Consequently the dead wood on the ground will be more flammable than the living trees that will be destroyed.

The size of fuel is another factor in its flammability. Smaller pieces of fuel are more likely to ignite than larger pieces of fuel. Therefore, the wood chips and logs will be more flammable than the living trees that will be destroyed.

One of the scientific studies cited by the DEIS corroborates these basic facts of fire science:

> *"Sites where the activity fuels piles had not been burned or where they had been masticated (mechanically chipped into small pieces and spread over the treatment area) were excluded from the study because research suggests these additional fuels increase fire severity."*[1]

(This study is quoted by the DEIS to support its claims about carbon loss resulting from fuel treatments. As we will tell you when we discuss carbon loss, the study has been misinterpreted or misquoted by the DEIS in that regard. The DEIS apparently overlooked this information about the flammability of wood chips and piles of dead vegetation.)

The location of this dead wood on the ground is another reason why it will increase fire hazard. The role of "near-surface" fuel in the rate of spread of fire was one of many variables studied by the Vesta Project in dry eucalyptus forest of Australia.[2] This project conducted many experimental fires in the eucalyptus forest under a variety of conditions to study fire behavior. This is one of their findings:

> *"Rate of spread is weakly related to fuel load alone but is directly related to other attributes of the surface fuel load and understory layer.* ***The near-surface fuel is the principal layer responsible for determining rate of spread."***

The environmental consultant that began the preparation of the Environmental Impact Statement was the URS Corporation. They were the consultant at the time of the Scoping Report. They evaluated the project plans of the

[1] Malcolm North and Matthew Hurteau, "High-severity wildfire effects on carbon stocks and emissions in fuels treated and untreated forest," *Forest Ecology and Management* 261 (2011) 1115-1120

[2] J.S. Gould, et. al., *Fire in Dry Eucalypt Forest: Fuel structure, fuel dynamics and fire behavior,* CSIRO and SCION, 2007

University of California and sent that evaluation to Alessandro Amaglio, FEMA's Regional Environmental Officer, in a letter dated May 27, 2009. (See Attachment A). This is the assessment of the plans to distribute wood chips on the ground to a depth of 24 inches:

> *"The comparative risk between eucalyptus in the form of a dense standing forest versus the form of a 2-foot-deep mulch layer on the ground is not well documented.* ***Studies have shown that mulch layers actually can pose a fire risk depending upon the type of material, the depth of the mulch, and the climate at the mulch site.*** *Studies at Ohio State University Agricultural Technical Institute demonstrated that sparks from cigarettes or matches can lead to a subsurface smoldering fire in a variety of mulch materials 4 inches deep. The* ***recommended depth for landscape mulch is less than 4 inches*** *to avoid stifling growth of remaining trees and to avoid spontaneous combustion that can occur when decomposition of organic materials creates enough energy in a pile to ignite a fire....****Fire Engineering Magazine recommends that to reduce the potential for fire in mulch, one should recognize that mulches high in oils ignite more easily and that mulch fires start more readily in hot climates where rain is scarce (and fuel moisture is low). Eucalyptus material is high in oils, and the East Bay Hills are subject to long annual periods that are hot and dry.*** *"*

In the Executive Summary the DEIS attempts to minimize the risk of fire associated with a deep mulch of dead wood by claiming that the mulch will decompose within 5 years (ES-10). However, later in the document, the DEIS says that the half-life of the mulch will be 5-years. (DEIS, 5.6-7) That means that only half of the mulch—or 12 inches—will decompose in 5 years. Another six inches will decompose after 10 years, and so on. In other words it will take 20 years for the mulch to decompose to less than an inch.

However, even this is apparently an unrealistic estimate of how long it will take for 24 inches of mulch to decompose. URS Corporation does not agree with this optimistic assessment of how long it will take to decompose 24 inches of wood mulch:

> *"The UC cites a study by Duryea et. al. where a high moisture level in mulch is assumed to assist the observed rapid decomposition rate in mulches; however, this study occurred in inland Florida where the climate is hot and humid and the study looked at a mulch layer that was less than 4 inches deep. It is likely that moisture retention would be significantly less in a thicker layer of mulch within a more moderate and arid climate such as the East Bay Hills."* (Attachment A)

In other words, the fire hazard associated with distributing tons of dead wood on the ground will persist for a very long time, probably more than 20 years.

The DEIS says that *"FEMA has determined that a proposed action must meet the criteria listed below to be eligible for funding under [Hazard Mitigation Assistance grant programs]"* (DEIS 2-2). One of the criteria that are listed is: *"Meet the requirements of applicable local, tribal, state, and federal laws; implementing regulations; and executive orders."* (DEIS 2-3)

The Fire Prevention Bureau of the City of Oakland publishes "General Compliance Standards & Requirements" which limits the depth of mulch: *"Do not pile wood chips or mulch on your property. Spread and maintain a depth not exceeding 6 inches."* [3] **The plans to spread 24 inches of mulch on properties in the City of Oakland do not comply with the regulations of the City of Oakland.** Therefore, these plans also violate the requirements of the FEMA grants which require that the plans comply with all local regulations.

[3] http://www.oaklandnet.com/wildfireprevention/docs/OFDNewsletterWeb.pdf

The plans of the East Bay Regional Park District to dispose of the dead wood of tens of thousands of trees on their properties are different, perhaps because they are being held to the policy standards of FEMA's Mitigation Policy MRR-2-08-1: *"However, the specific requirements and eligibility criteria of the mitigation policy apply only to projects for which the grant application period was open on or after September 8, 2008. Therefore, this policy applies only to the EBRPD HMGP grant application."* (DEIS 1-5)

One of the criteria of FEMA's Mitigation Policy MRR-2-08-1 is that *"material left on the site must meet appropriate depth practices."* In compliance with that criteria, the proposed and connect projects of EBRPD limit the spreading of wood chip mulch to a depth of 4-6 inches.

Prescribed burns increase risks of wildfire

Since this limitation of mulch depth prevents EBRPD from disposing of the tons of dead wood resulting from the destruction of tens of thousands of trees, they propose to conduct prescribed burns to pile burn the excess wood. FEMA's Mitigation Policy MRR-2-08-1 prohibits the use of grant funds for conducting prescribed burns: *"Certain project activities and their associated costs are not eligible for funding: Projects for prescribed burns or clear-cutting"*

Therefore, the DEIS informs us that EBRPD will conduct prescribed pile and broadcast burns to dispose of excess wood (and other "undesirable invasive plant species"), but that these burns will not be funded by the FEMA grant.

These prescribed burns will pollute the air and contribute to the greenhouse gases that are causing climate change, but we will discuss those issues in detail when we comment on greenhouse gases. For the moment, we will focus on the fact that **prescribed burns increase fire hazards because they often cause catastrophic wildfires unintentionally**. Here are specific and local examples of prescribed burns that caused wildfires:

- In October 2009, a prescribed burn in the Santa Cruz Mountains was responsible for a wildfire that burned 485 acres, injuring 4 of the 1,700 firefighters who fought it at a cost of $4 million. That cost does not include the claims for damages of the property owners who lost their homes.[4]
- In May 2000 a prescribed burn in the Bandelier Monument in New Mexico eventually burned over 45,000 acres, threatened the Los Alamos National Laboratory and destroyed 235 structures.[5]
- In October 2009, the Big Meadow fire in Yosemite began as a prescribed burn and eventually burned 7,425 acres.[6]
- In 2003, the California State Park Department was responsible for starting a fire on San Bruno Mountain in South San Francisco intended to burn 6 acres that eventually burned 72 acres and came perilously close to homes.[7]

We should not be surprised by the unpredictable results of prescribed burns. Fire scientists at UC Berkeley conducted a series of experimental prescribed burns in chaparral in Northern California, hoping to arrive at a model of fire behavior that would improve the predictability of such burns. They arrived at the conclusion that **"...it is extremely difficult to**

[4] http://www.sfgate.com/news/article/Cal-Fire-says-its-crews-caused-wildfire-3263483.php
[5] http://www.nps.gov/cerrogrande/executive_summary.htm
[6] http://www.nps.gov/yose/parkmgmt/bigmeadowfirefaq.htm
[7] http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2003/07/09/BA187572.DTL

predict with certainty where the fire will spread...For more than half of the transects installed, the flaming front did not traverse the transects as predicted..."[8]

In addition to increasing fire hazard, there is also evidence that **some fire scientists do not think prescribed burns conducted for the purpose of reducing fuel loads actually reduce the risk of wildfire.** Jon E. Keeley (Ph.D. Biologist, US Geological Service) is a world-renowned expert on the fire ecology of Mediterranean climates, such as California. Here's what he has to say about prescribed burns with respect to their ability to reduce fire hazard risks:

> *"Fire management of California shrublands has been heavily influenced by policies designed for coniferous forests, however, fire suppression has not effectively excluded fire from chaparral and coastal sage scrub landscapes and* ***catastrophic wildfires are not the result of unnatural fuel accumulation.*** *There is no evidence that prescribed burning in these shrublands provides any resource benefit and in some areas may negatively impact shrublands by increasing fire frequency. Therefore,* ***fire hazard reduction is the primary justification for prescription burning, but it is doubtful that rotational burning to create landscape age mosaics is a cost effective method of controlling catastrophic wildfires."***[9]

If East Bay Regional Park District is held to the policy standards of FEMA's Mitigation Policy MRR-2-08-1, there are other "Ineligible Wildfire Activities" which would apply: *"Projects to address ecological...issues" and "Projects to protect the environment..."* These recommended treatment areas in the East Bay Regional Parks should not be funded by a FEMA grant because they violate FEMA's policy governing these grants:

- HP2, HP3, HP4: "Presence of Pallid Manzanita requires hand labor treatments...Remove non-manzanita shrubs and prune retained trees."
- RD4, TI6, TI15: "Enhance conditions for Oakland star tulip and western leatherwood..."

Pallid Manzanita requires fire to germinate and its recovery plan says explicitly that suppression of fire is the primary reason why it is rare and endangered. Therefore, it is both inappropriate and contradictory to pay for its care with a FEMA grant that is intended to reduce fire hazard. This is one of many examples of the confused mission of these projects. FEMA need not be confused by the contradictory mission of the owners of these public lands. **FEMA has only one mission and that is to reduce and mitigate for catastrophic hazards.**

<u>What type of vegetation will replace the destroyed forest and will it be more flammable than the existing forest?</u>

Any terrestrial plant or tree will burn under certain conditions that are conducive to fire. Obviously, eucalypts are not exempt from this general rule. However, the analytical question in evaluating the proposed projects should not be whether or not eucalypts are flammable, but rather whether or not they are **more** flammable than the vegetation that will replace them. That is the question that we will now consider.

The DEIS states the belief of the sponsors of the proposed project that native plants and trees will replace the non-native plants and trees that they intend to destroy. However, they have no intention of planting native plants and trees. Rather, they believe that existing native plants will occupy the bare ground by "recruitment" and/or germination of a dormant seed bank which they assume exists beneath the non-natives they intend to destroy.

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[8] Scott L. Stephens, et.al., "Measuring the Rate of Spread of Chaparral Prescribed Fires in Northern California," *Fire Ecology*, vol. 4, no 2008.

[9] Jon E Keeley, "Fire Management of California Shrubland Landscapes," *Environmental Management*, March 2002, Volume 29, Issue 3, pp. 395-408

Although this seems to us a fantasy, for the moment we will accept this premise in order to ask and answer this analytical question: **If native plants and trees occupy the bared ground, will that native landscape be more or less flammable than the existing landscape?**

We will let the California Native Plant Society introduce this question because we hope that it will be considered a credible source by native plant enthusiasts who are advocating for this project:

> *"Contrary to what many people think, **it is not possible to make broad statements about fire risk and invasive plants, just as you cannot for native plants. Each species must be evaluated separately.** Finally, it is impossible to discuss the fire risk potential of any plant without also taking into account its health at any given time. **Any plant will burn under the right conditions**, and the most 'fire resistant species' can become great fuel for a wildfire if it contains a lot of dead tissue due to a lack of proper maintenance."*[10]

We couldn't agree more. Therefore, we will compare the flammability of eucalypts with specific native species that the project sponsors claim will replace them. According to the DEIS, *"Oak-bay woodlands total 320.6 acres in the proposed and connected project areas and represent the second largest vegetation community identified in the proposed and connected project areas."* (DEIS 4.2-17) Also, the "vegetation management goals" for the Recommended Treatment Areas in EBRPD's FEMA applications are predominantly oak-bay woodland. Thirty-seven of the 47 (80%) RTAs in the FEMA grants are destined to be oak or oak-bay woodland when this project is implemented.

Therefore, we will evaluate the assumption of the DEIS that oak-bay woodland will be less flammable than the existing landscape. We will cite the scientific and observed evidence that oaks and bays are not less flammable than the non-native trees and shrubs that will be removed or thinned by the proposed FEMA projects.

First, the evidence regarding the flammability of oaks and bays:

Moisture The moisture content of vegetation is a factor in how easily it will ignite. Other conditions being equal, **the more moisture within the vegetation the less likely it is to ignite**. A study done locally in native vegetation reports that, *"...**the [moisture] of the live oak was fairly constant throughout the fire season and at a lower moisture content than the other species**...the lowest moisture content was [47%] on September 30th..."*[11] We don't have comparable information regarding moisture for eucalyptus because moisture content varies by specific location and climate conditions. However, the literature[12] generalizes the moisture content of the eucalyptus leaf as roughly 50%, which suggests that the **eucalyptus leaf probably does not contain less moisture than an oak leaf.**

We will discuss the question of moisture again when we evaluate the fuel models used by the computer modeling of fire behavior in the DEIS.

Sudden Oak Death Since all dead vegetation contains less moisture than any living vegetation and is therefore more flammable, Sudden Oak Death is a related issue. The pathogen (*Phytophthora ramorum)* that causes Sudden Oak Death (SOD) was reported on the UC Berkeley campus in 2002.[13] At that time it also existed at the UC Botanical Garden, which

[10] Sabrina Drill, "Sustainable and Fire Safe Landscapes: Achieving wildfire resistance and environmental health in the wildland-urban interface," *Fremontia,* Vol. 38, No. 2 and No. 3, April and July 2010.
[11] Rice, Carol, "Live Fuel Moisture, Fuel Bed Characteristics, and Fire Vegetation in the Berkeley/Oakland Hills," Master's dissertation, UC Berkeley, 1987.
[12] http://www.buzzle.com/articles/what-do-koala-bears-eat.html
[13] http://www.universityofcalifornia.edu/news/article/3880

is proximate to UC Berkeley's FEMA projects. By 2011, the SF Chronicle reported that the infestation of SOD was spreading rapidly in the East Bay and had been found in North Berkeley, the Claremont district in Berkeley and the Montclair area in Oakland. That article predicted that 90% of the native live and black oaks in California will be dead within 25 years.[14]

One year later, based on the sampling done by thousands of volunteers participating in the 2012 SOD Blitz, the California Oak Mortality Task Force reported these findings:[15]

- *"The USDA FS 2012 annual aerial detection survey for California mapped 376,000 new dead oak (Quercus agrifolia) and tanoak (Notholithocarpus densiflorus) over 54,000 acres in areas impacted by SOD."*

- ***"Most of the Bay Area locations sampled had increased levels of infection, with the East Bay infestation found to have transitioned from a newly arrived status (in 2011) to epidemic levels on California bay laurel** (Umbellularia californica) (in 2012)."*

We participated in the 2013 SOD Blitz in the East Bay on April 27, 2013. This volunteer effort is led by Matteo Garbelotto, a scientist at UC Berkeley studying Sudden Oak Death. He has organized the SOD Blitz throughout Northern California to determine the spread of the disease. Hundreds if not thousands of citizens attend his workshops to learn how to identify the disease and take leaf samples of native bay trees for testing in Garbelotto's laboratory. Oaks aren't sampled because that requires cutting into the bark of the tree which can damage the tree if not done properly. **Based on previous studies, Garbelotto informed participants in the survey that bays that are infected with the pathogen are assumed to infect oaks within 200 feet of infected bays. So, based on the SOD map that identifies infected bays in the East Bay, we should assume that all oaks within 200 feet of those infected bays are doomed to die eventually.**

[14] Fimrite, Peter, "Sudden oak death cases jump, spread in the Bay Areas," San Francisco Chronicle, October 2, 2011
[15] "Sudden Oak Death and *Phytophthora Ramorum*, 2011-2012 Summary Report, California Oak Mortality Task Force

This is a detail of an area south of Lake Anza and west of the Tilden Botanical Garden from the SOD Map which is available on the internet. Infected bay trees identified by the 2012 SOD Blitz are indicated with red triangles. This small portion of the SOD Map shows that 6 infected bay laurel trees were found in 2012 in four of the FEMA project areas: TI010, TI011, TI012, and TI1020. This is not a complete list of the infected bays in all project areas. It is only an illustration that SOD exists in the FEMA project areas.

The oak woodland in the East Bay is called the oak-bay woodland for a reason. The oaks and bays grow together in close proximity. Although bays are hosts of the SOD pathogen, they are not killed by it. However, bays are considered the primary vector of the disease to the oaks which are killed by it: *"Bay laurel are not thought to die from P. ramorum infection, but these trees are a major source of inoculum for the pathogen and appear to play an important role in spreading disease to other plants in California."*[16] For that reason, property owners and managers of public lands are being advised by scientists to remove bay laurels growing in proximity to oaks: *"Scientifically-tested recommendations for managing forests impacted by P. ramorum are still in development, although at least three promising directions have*

[16] UC Davis IPM Online: http://www.ipm.ucdavis.edu/PMG/PESTNOTES/pn74151.html

emerged: application of systemic fungicides, forest thinning to remove susceptible hosts, and ***targeted removal of the main carrier, California bay laurel, near coast live oak.***"[17]

To summarize these reports: the spread of SOD in the East Bay has reached epidemic portions and is expected to kill most of the oaks. Meanwhile, one of the few treatments being recommended by scientists to limit the spread of the disease is to remove bay laurels that grow near oaks. The future of the oak-bay woodland in the East Bay is indeed dim. (This is a good opportunity for me to express my deep affection for oaks. Please do not misunderstand that I am pleased about this bad news.)

Scientists studying SOD have determined that the spread of the disease is facilitated by warm, rainy days, most likely to occur in the spring. And models of climate change, predict just such conditions in the future. [18] How ironic that the destruction of hundreds of thousands of trees in the East Bay will contribute to climate change by releasing hundreds of thousands of tons of carbon dioxide to the atmosphere.

SOD researchers have also reported that SOD deaths are increasing the risk of severe wildfire:

> *"The researchers found fuel buildups in Douglas-fir-tanoak forests with high SOD-related hardwood mortality could increase wildfire flame lengths by 3 to 4 feet and double a wildfire's rate of spread, depending on how much time has elapsed since initial infection. Not only does SOD alter fuel quantity in these forest types, but it can also change the arrangements of fuels, posing serious challenges to firefighter response in infested stands. After trees die from the disease, they can remain standing with dry, dead leaves for several years, greatly increasing the likelihood of crown fire under extreme weather conditions. Likewise, the increased fuels on the forest floor can take a long time to break down, posing a long-term fire hazard and additional risks to firefighters. In many cases, modeled wildfire conditions in SOD-impacted forests exceed safety thresholds for hand crews, calling for changing suppression tactics and strategies, such as more heavy equipment, aircraft use, and indirect lines."*[19]

Doing a word search for Sudden Oak Death and SOD through the 3,000 page DEIS, we find that Sudden Oak Death appears only in the Scoping Report. Seven public comments submitted during the scoping process mentioned concern regarding Sudden Oak Death and these comments are reported in the Scoping Report (DEIS, Appendix K1).

Despite the public's expressed concern regarding Sudden Oak Death during the scoping process and the written record of their concern, the DEIS makes no mention of Sudden Oak Death. Since the scoping process in 2010, we now have overwhelming scientific evidence that Sudden Oak Death is rampant in the East Bay, that it is spreading rapidly, that its spread is associated with climate change, and that it is increasing the risk of severe wildfire, yet the DEIS ignores these serious threats to the oak-bay woodlands. This omission verges on incompetence, if not negligence.

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[17] Janice Alexander, Christopher Lee, "Lessons Learned from a Decade of Sudden Oak Death in California: Evaluating Local Management," *Environmental Management,* 2010, 46:315-328.

[18] Kliejunas, J.T. 2011. A Risk Assessment of Climate Change and the Impact of Forest Diseases on Forest Ecosystems in the Western United States and Canada. Gen. Tech. Rep. PSW-GTR-236. Albany, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Research Station. 70 p. (4/12)

[19] Valachovic, Y.S.; Lee, C.A.; Scanlon, H.; Varner, J.M.; Glebocki, R.; Graham, B.D.; and Rizzo, D.M., "Sudden Oak Death-Caused Changes to Surface Fuel Loading and Potential Fire Behavior in Douglas-fir-Tanoak Forests," *Forest Ecology and Management.* 261:1973-1986. (3/12)

One wonders why the government bothers with a public comment period such as the scoping process, when the public's concerns are obviously ignored.

If the consequences of Sudden Oak Death in the oak-bay woodland in the project areas are not adequately explained by the Final EIS, FEMA can be assured that it will be legally challenged by the taxpayers. At the very least, taxpayers need to know if there will be any trees left in the East Bay hills, either native or non-native. And if the expansion of oak woodland increases the risk of wildfire, funding of these FEMA grants would be entirely inappropriate.

Embers Laboratory tests conducted by the USDA Forest Service on four species of native plants and trees found that native chamise and oaks loft embers absent any wind. In the case of oaks, the scientists report that "Many of the oak leaves had sharp points (i.e., spines) around the outer edge. **The oak leaves would ignite at these points, sometimes accompanied by small explosions of the points that led to the ejection of small brands."**[20]

A park ranger on Angel Island reported that embers from the burning oaks were responsible for nearly igniting the historical buildings on the island during the wildfire of 2008: **"'All the oaks up there were burning,' said the 28-year veteran of the department. 'It was an ember shower** that just rained on the entire building, and all the vegetation around us was burning.'"[21] Most of the eucalypts (80 acres) had been removed from the island about 12 years before the 2008 fire. The fire stopped at the edge of the remaining forest.[22]

Volatile Oils Volatile oils are said to increase the likelihood of ignition, particularly by those who advocate for the destruction of eucalypts, which contain volatile oils. Native bay laurel also contains volatile oils: *"In the fruit, there are essential oils and fatty oils present. The fruit is pressed and water extracted to obtain these products. The fruit contains up to 30% fatty oils and about 1% essential oils...The leaves contain about 1.3% essential oils (Ol. Lauri folii), consisting of* ***45% eucalyptol...***"[23] **In other words, the predominant oil in the leaf of bay laurel is the same oil in the leaf of eucalypts.** According to Cornell University studies, essential/volatile oils in blue gum eucalyptus leaves range from less than 1.5 to over 3.5%. [24] The leaves of native California bay laurel trees contain 7.5% of essential/volatile oils, **more than twice the amount of oil in leaves of blue gums.**[25]

The "Wildfire Hazard Reduction and Resource Management Plan" of the East Bay Regional Park District acknowledges the flammability of bay laurels: *"Consider selecting young bay trees for removal, as bay trees tend to produce ladder fuels and are known for their oil content. This species also is known to be a vector of sudden oak death and may prevent oak regeneration."* (page 190)

Fire Ladders The likelihood of a fire reaching the canopy of a tree, causing a crown fire which is more likely to disperse embers into the surrounding vegetation is increased by the existence of the tree's "fire ladder" to its crown. The fire ladder is composed of low-hanging branches that enable a fire traveling on the ground to move from the ground into the tree, via the "ladder." Both oaks and bays have low fire ladders, in many cases extending to the ground. It is not uncommon for the multiple trunks of the bay to actually lie on the ground, sending new stems vertically from its horizontal position. The coast live oak, which is the locally predominant species of oak, has a prostrate growth habit.

[20] Smith, Steven., et al. "Ignition Behavior of Live California Chaparral Leaves," USDA Forest Service, Riverside, CA
[21] "Tiburon battalion chief and Larkspur fire crew save historic Angel Island structure," Marin Independent Journal, 10/18/08
[22] http://www.sfgate.com/bayarea/article/After-fire-Angel-Island-is-a-park-of-contrasts-3265688.php
[23] http://en.wikipedia.org/wiki/Bay_laurel
[24] http://www.ansci.cornell.edu/plants/medicinal/eucalyp.html
[25] http://www.paleotechnics.com/Articles/Bayarticle.html

Particularly in windy conditions, its canopy will "kneel" into the wind, putting its canopy up as an umbrella against the wind. **Both oaks and bays have much lower fire ladders than any of the non-native trees that are proposed for destruction by the FEMA grant projects**: eucalypts, Monterey pines, and acacias.

The DEIS claims that the native trees will be limbed up to eliminate fire ladders:

"The proposed and connected actions would remove the lower limbs of trees..." (DEIS 5.2-1) Then later in the DEIS modified to: ***"Many** remaining trees would be pruned up to 8 feet from the ground..."* (DEIS 5.2-3) In Appendix M, the DEIS says, *"Treatments on property owned by the University of California are expected to raise the height to live crown base but not specifically to eight feet..."* These three inconsistent sentences should be revised so that they are consistent in the final EIS. Ladder fuels are an important variable in determining fire hazard in the post-treatment landscape. Therefore, the public deserves to know what commitment is being made by the property owners to the elimination of ladder fuels.

The branching structure of oaks and bays are such that many of them would be entirely destroyed if the lower 8 feet of their limbs were removed. With the exception of large, old oaks, limbing up 8 feet from the ground will not be physically possible. Attempting to limb up a small oak to that height will seriously disfigure the tree.

Duff and Leaf Litter The quantity and composition of leaf litter are factors in ignition. The more likely the leaf litter is to ignite, the more likely the fire is to spread into the tree, causing a crown fire that disperses embers. Here is a description of the flammability of oak leaf litter from a website about the oak savannah:

"•Oak leaves and litter burn much more readily than the litter and leaves of other hardwoods.
• Oak leaves are much thicker than those of other hardwoods, giving them greater resistance to decomposition and longer life spans in the leaf litter.
• Oak leaves tend to be drier (more xerophytic) than other hardwood species, making them more flammable.
• Oak leaves curl more than other hardwoods. This puts the fire up off the ground, making it capable of spreading more effectively. Thus, oak leaves are more flammable and more capable of "carrying" a fire.
• Oak leaves contain tannins which make them more resistant to decay, so that it may be several years before all the leaf material has been turned into compost. Thus, the amount of burnable material on the oak forest floor is greater than that with other tree species."[26]

These observations are confirmed by the plant and tree database of the US Forest Service, which says of the coast live oak: *"Flammability of coast live oak and chaparral communities with a coast live oak component is of particular concern because of their high fuel loading and proximity to urban areas. Some fire-excluded chaparral habitats have fuel accumulations of 30 to 40 tons per acre."*[27]

Secondly, the evidence regarding the flammability of eucalypts:

Moisture The tall, non-native trees condense the year-round fog in the San Francisco Bay Area: *"Eucalyptus and pine groves planted there [Berkeley hills] long ago intercept large amounts of fog and cause a rainlike deposit of moisture. The fog drip during the summer months has been measured at a surprising 10 inches, an amount nearly half as great as the total rainfall..."*[28] Average rainfall in the East Bay is 22 inches per year, so this fog precipitation adds nearly 50% to

[26] http://oaksavannas.org/fire-fuel.html
[27] http://www.fs.fed.us/database/feis/plants/tree/queagr/all.html
[28] Gilliam, Harold, Weather in the San Francisco Bay Area, UC Press, 2002.

total precipitation. **By contributing moisture to the forest floor during the otherwise dry time of the year, tall non-native trees reduce fire danger. The moisture content of the duff and leaf litter diminishes the likelihood of ignition.**[29] **If the duff and leaf litter do not ignite, the fire is less likely to spread into the canopy of the tree.**

Because oaks and bays are not as tall as the non-native trees, they do not precipitate as much fog drip. The only tall native tree in the East Bay hills is the redwood. However, there aren't many redwoods in the East Bay hills because they do not tolerate wind and they require much more water than the non-native trees.[30] **They are therefore not a suitable replacement for existing non-native trees.**

The DEIS makes a lame attempt to nullify the benefit of fog drip in the suppression of ignition during the fire season by claiming that that benefit is counteracted by the fact that the trees intercept rainwater: *"The overall direct impact on precipitation of thinning or removing trees and vegetation from the East Bay hills appears to be that more rainfall but less fog drip water would reach the ground. Thus the annual precipitation reaching the ground may not be substantially different after treatment than before."*(DEIS 5.6-9) Since the fog drip occurs during the dry fire season and the rain occurs when there is no fire hazard, the loss of fog drip to moisten the forest floor and reduce the risk of ignition is not compensated for by increased rainfall during the winter when there is no risk of ignition.

Combustibility Scientists at the University of Tasmania conducted laboratory experiments on the plants and trees in the Tasmanian forest to determine the relative flammability of their native species. The predominant eucalyptus species in the San Francisco Bay Area, the Blue Gum eucalyptus (*E. globulus*), is native to Tasmania and was therefore included in this study. The study reports that, "*E. globulus* leaves, both juvenile and adult, presented the greatest resistance [to ignition] of all the eucalypts studied. In this case, leaf thickness was important as well as the presence of a waxy cuticle." Also, in a table entitled "Rate of flame front movement, the comment for *E. globulus* leaves is "resistant to combustion."[31] In other words, despite the oil content in the leaf, its physical properties protect the leaf from ignition.

These findings are corroborated by local wildfire experience. The National Park Service is one of many managers of public lands that are engaged in massive restorations of native plants that frequently result in the destruction of non-native trees. In support of that effort, NPS has published a brochure about eucalyptus. Deeply embedded in the fine print of that brochure, the park service admits that live eucalyptus leaves are resistant to fire: "The live foliage [of eucalypts] proved fire resistant [during a fire on Mt Tamalpais], so a potentially catastrophic crown fire was avoided."[32]

This brochure also contains a table comparing the fuel loads of eucalyptus with native oaks and bays. We find that the table has been carefully constructed to support their belief that eucalypts are more flammable than native trees. If logs (which would take 1,000 hours to ignite[33]) were removed from this table, **the available fuel load of eucalyptus is not greater than that of native oaks**.

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[29] Schroeder, Robert, et. al., "Ember ignitability of Pinus radiata and Sequoia sempervirens Litter: Methodology and Results," in Proceedings of the California Wildfire Conference: 10 Years after the 1991 East Bay Hills Fire, UC Press, 2001.

[30] http://www.fs.fed.us/database/feis/plants/tree/seqsem/all.html

[31] Dickinson, K.J.M. and Kirkpatrick, J.B., "The flammability and energy content of some important plant species and fuel components in the forests of southeastern Tasmania," Journal of Biogeography, 1985, 12: 121-134.

[32] http://home.nps.gov/pore/parkmgmt/upload/firemanagement_fireeducation_newsletter_eucalyptus_p2.pdf

[33] *For a technical explanation of timelag, we quote from Sugihara's Fire in California Ecosystems: "The proportion of a fuel particle that contains moisture is a primary determinant of fire behavior...Timelag is the amount of time necessary for a fuel component to reach 63% of its equilibrium moisture content at a given temperature and relative humidity [the point at which ignition occurs]. 1,000-hour fuels reflect seasonal changes in moisture..."*

The eucalypts' resistance to ignition is best illustrated with a photo[34] of a wildfire in 2003 in San Diego County which destroyed an entire neighborhood of homes without spreading into the eucalyptus forest which surrounded them.

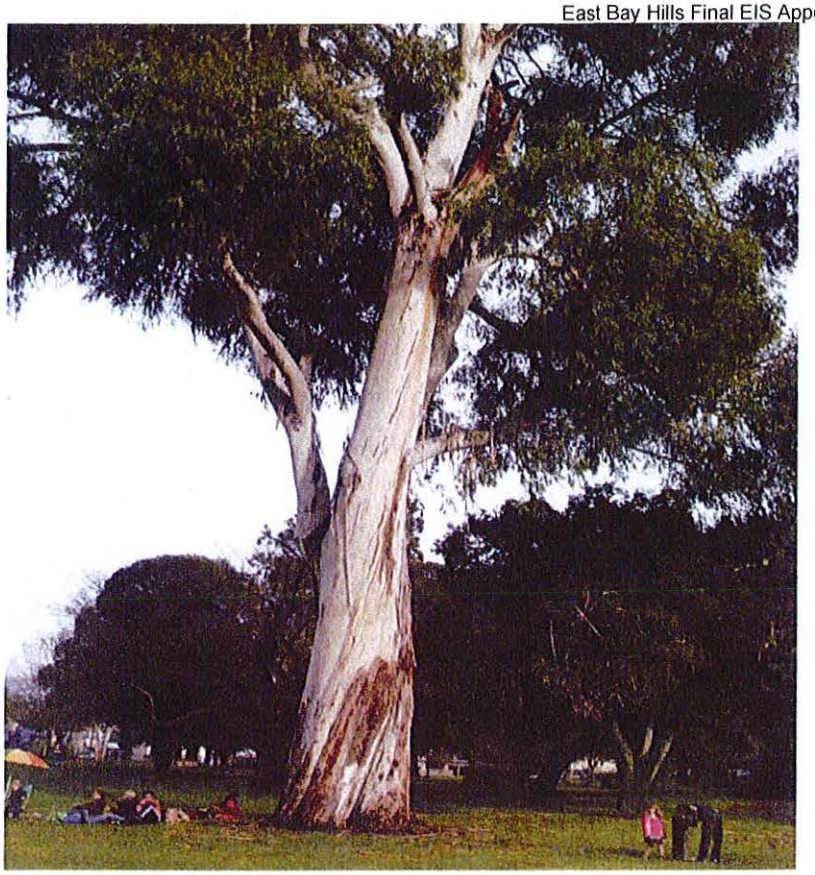
Embers

As we said earlier, laboratory tests and observations of fires have both shown that oak trees cast live embers. However, oak trees are not as tall as eucalypts. Therefore, the DEIS assumes that the height of eucalypts will loft embers for greater distances. The DEIS also identifies the bark of the eucalyptus as the likely ember, which is consistent with the fact that the leaves are known to resist ignition. Although these assumptions have a logical appeal, they deserve closer scrutiny. We return to the Vesta Project for a better understanding of the ability of eucalypts to loft live embers long distances.

The initial experimental fires conducted by the Vesta Project were done in jarrah (*Eucalyptus marginata*) forest which is a species of eucalyptus with stringy bark that extends to the canopy. The bark of our predominant species of eucalyptus (Blue Gum) is described by the Vesta Project as "ribbon of bark, but smooth trunk." The Vesta Project gave this type of bark a lower hazard rating than the stringy bark of the jarrah.

As you can see in this photograph of a local eucalyptus, the bark of the Blue Gum does not extend to the canopy. Depending upon the height of the tree, the bark covers only the first few yards of the trunk.

[34] Source: New York Times, 10/27/03



Mosswood Park, Oakland

The flaming bark of the Blue Gum would have to be lofted above the canopy of the tree by the fire's convection column before it could be entrained by the wind to ignite a spot fire: *"Firebrands are flaming or glowing pieces of fuel...that are transported ahead of a fire-front by wind or by the combination of wind and the fire's convection column. In the latter case, the burning firebrand is entrained into and lofted by the convection column and then released at some height downwind of the fire front."*[35] Obviously the fuel would have to be burning continuously during this transport in order to ignite a fire when it lands, which is why the Vesta Project reports that, *"Most firebrands burn out within the convection column."*

To summarize, experiments and observations of fires have shown that the leaves of the Blue Gum eucalyptus resist ignition. If the leaves do not ignite, they cannot become firebrands that have the potential to ignite spot fires. The bark of the Blue Gum is more likely to be lofted as a firebrand. However, it would have to be lofted from the base of the tree, then above tree canopy before it could be transported some distance. In that case, the probability that it would still be burning seems remote.

The FEMA Technical Report of the 1991 Oakland fire does not corroborate the claim of the DEIS that the eucalypts are the most likely source of the many embers and firebrands that started spot fires in advance of the spreading fire. It does not identify any particular source of embers and firebrands, but it does make it perfectly clear that everything was burning and therefore, everything was a potential firebrand in this wind-driven fire: *"The actual spread of the fire, in most cases, was observed to be flaming brands and embers, carried by the wind and dropping onto ignitable fuels ahead*

[35] JS Gould et.al., *Fire in Dry Eucalypt Forest: Fuel structure, fuel dynamics and fire behavior,"* CSIRO and SCION, 2007

of the fire front. The ignitable fuels included trees, brush, grass, and other natural fuels, as well as wood roofs, debris in rain gutters, and other combustibles around structures."[36]

A book about the 1991 wildfire in the Oakland/Berkeley hills is another source of information about the fuel in that fire.[37] The author interviewed many fire survivors and reported their observations of the fire. The book **states repeatedly that native plants and trees were involved in that fire.** Every tree mentioned in the following quotes from that book is native to the Bay Area:

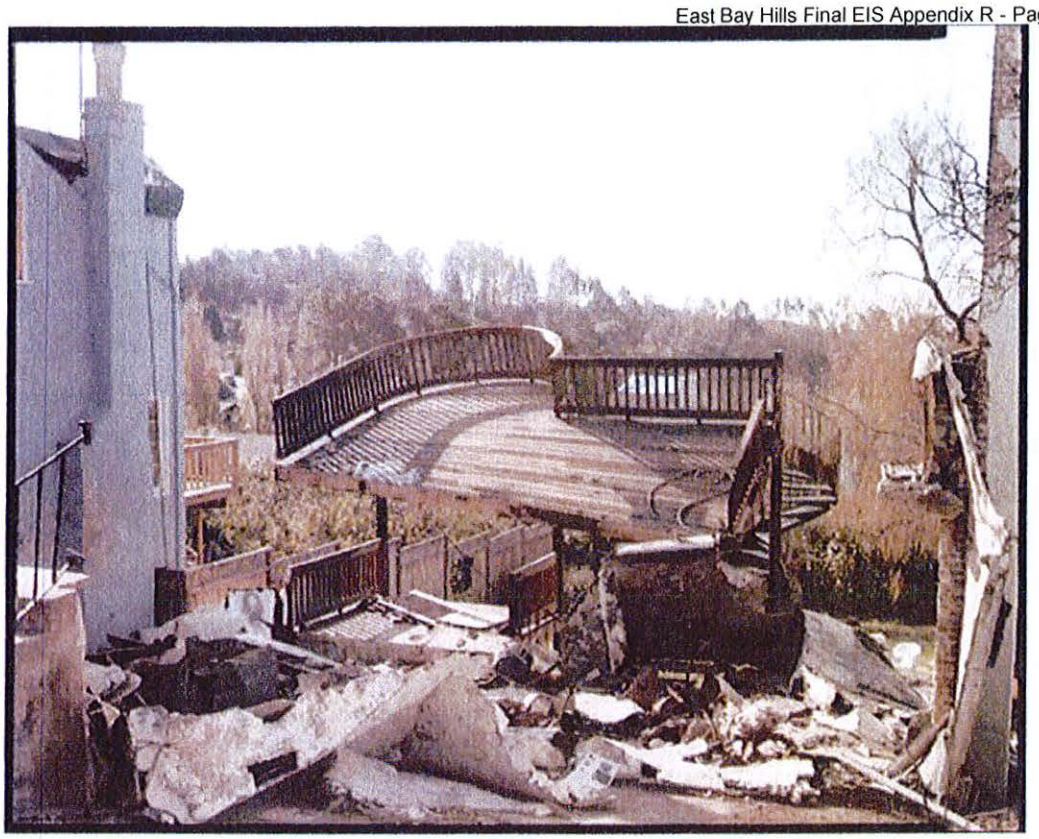
- *"...flames surging through the dry underbrush and **live oaks** that line the street..."*
- *"...neighborhoods...are built into the contours of the grassy hills and **live-oak-and-laurel studded canyons**..."*
- *"...hillsides covered in seasonal grasses or had overlooked ravines of **oak and madrone**...were devastated by the fire."*
- On Vicente Road, ***"Two redwoods up the street caught fire like matchsticks."***
- *"Roble Road and... Roble Court, derive their name from the...Spanish word for the **live oak tree that grows densely there**...the devastation on lower Roble...was fairly complete..."*

In the single mention of the role of eucalypts in the fire, the fire skips over the tree canopy: *"The fire swept right over [the houses] scorching the crowns of surrounding eucalyptus trees."* Note that the eucalypts were "scorched" but did not burn. And the Monterey pine—also targeted for eradication by native plant advocates—plays a similar role in a nearby location: *"Across the street a grove of Monterey pines shields the white clapboard buildings of the private Bentley School..."*

This is a picture taken shortly after the 1991 fire by Richard Misrach ©that illustrates the observations we have cited. We see in the foreground one of the homes that was completely destroyed by that fire. In the middle-ground, we see some burned vegetation. In the background, on the ridgeline, we see a stand of eucalypts that were untouched by that fire. Did those trees stop the advance of the fire? Perhaps.

[36] FEMA Technical Report, 1991 Oakland Fire

[37] Margaret Sullivan, *Firestorm: the study of the 1991 East Bay fire in Berkeley*, 1993



The principles of evolutionary theory suggest that trees that evolved in similar climates will have similar properties. Most of our non-native trees are from a Mediterranean climate, much like our own climate. As the scientists at the University of Tasmania observed in their study of their native flora, *"The range of energy values recorded in this study is...similar to documented levels in Mediterranean plant species."*[38]

No evidence that Monterey pine and acacia are particularly flammable

We have focused on eucalyptus in discussing its flammability relative to native trees because it is the primary target of this project, but before we leave this topic, I should add that the DEIS assumes that both Monterey pines and acacia are equally flammable without providing any evidence to support that assumption. In its letter of May 27, 2009, URS Corporation questions this assumption:

> *"The UC asserts that Monterey pine and acacia are regionally exotic species...The UC inaccurately characterizes the fire hazard risk posed by the two species however... Monterey pine and acacia trees in the treatment area only pose a substantial fire danger when growing within an eucalyptus forest. In the absence of the eucalyptus overstory, they do not pose a substantial fire hazard."* (Attachment A)

Robert Shroeder and Robert Martin (UC Berkeley) compared the ignitability of leaf litter and duff layers of Monterey pine with Redwood leaf litter and duff layers in the laboratory.[39] They report that although the litter of the Monterey

[38] Dickinson, K.J.M. and Kirkpatrick, J.B., "The flammability and energy content of some important plant species and fuel components in the forests of southeastern Tasmania," Journal of Biogeography, 1985, 12: 121-134.

[39] Robert Schroeder and Robert Martin, "Ember Ignitability of Pinus Radiata and Sequoia Sempervirens Litter: Methodology and Results," in "Proceedings of California's 2001 Wildfire Conference: 10 Years After the 1991 East Bay Hills Fire"

pine is slightly more likely to ignite than equally moist litter of the Redwood, the litter of the Redwood is more resistant to moisture and is therefore more likely to ignite.

If the final EIS cannot provide evidence of the flammability of Monterey pines and acacia, they should be not be destroyed by a FEMA grant which is for the purpose of fire hazard mitigation.

In conclusion, there is no evidence that the destruction of exclusively non-native trees in order to promote the growth of native species will reduce fire hazard. In fact, it may increase fire hazard if SOD kills the oak woodlands that are the landscape goal of these projects. In any case, distributing tons of dead wood on the ground will be far more flammable than the existing landscape.

There is one important caveat to this conclusion. FEMA's technical report on the 1991 fire does not single out eucalypts as the cause of that fire. The fire started in grass—as do most fires in California because grass ignites easily—and spread to predominantly native scrub and chaparral. The only specific mention of the role of eucalypts in the 1991 fire in the FEMA report is related to the deep freeze that occurred the winter preceding that fire: *"The unprecedented drought was accompanied by an unusual period of freezing weather, in December 1990, which killed massive quantities of the lighter brush and eucalyptus. Dead fuel accumulated on the ground in many areas and combined with dropped pine needles and other natural debris to create a highly combustible blanket. Due to the fiscal cutbacks, governmental programs to thin these fuels and create fuel breaks were severely curtailed, so the fuel load was much greater than normal by the second half of 1991."*[40] Such freezes, sufficiently deep and sustained, causing eucalypts (and other plants) to die back are very rare in the Bay Area. In fact, there has not been such a freeze in 23 years and the previous freeze was in the early 1970s. Since they are rare, they can be easily mitigated by clearing the dead debris after such a freeze, a significantly more cost-effective and less destructive measure than destroying hundreds of thousands of trees.

The DEIS claims to have considered this as an alternative to the proposed projects, but rejects it as too costly: *"The fire hazard represented by eucalyptus trees can be reduced by removing or chipping the dead material after a freeze. This is a major undertaking, however, and because it is not done regularly, the personnel, equipment and funds required to do it quickly are not likely to be available. Cutting and removing or chipping eucalyptus trees avoids the fire hazard a freeze creates."* (DEIS 3-3) There has not been such a freeze in over 23 years and the DEIS acknowledges that the climate in the Bay Area has warmed and is expected to continue to warm. It seems possible—if not likely—that there will not be another such freeze. Therefore, the preventive medicine of destroying all non-native trees seems unnecessarily destructive.

If the final EIS continues to maintain that cleaning up after a freeze is not cost-effective, please provide the cost-benefit analysis that would support such a claim. Please include in that cost-benefit analysis evidence that specialized equipment and personnel would be required to remove dead leaf litter, something ordinary gardeners should be capable of doing with the tools they have on hand.

Recall that we are considering the question of whether or not the existing landscape is more flammable than the native landscape which is predicted by the sponsors of these projects. We have answered that question by comparing two specific species with respect to their flammability: the predominant non-native species that will be destroyed (eucalyptus) and the oak-bay woodland which sponsors believe will be "recruited" into the landscape now occupied by

[40] Page 6, "East Bay Hills Fire Oakland-Berkeley, California," United States Fire Administration, Technical Report Series, FEMA

non-native plants and trees. We have not found any evidence that the oak-bay woodland is less flammable than the eucalyptus forest now and even less likely to be less flammable in the future, given the spread of SOD.

Are native plants and trees less flammable than non-native plants and trees?

Now we will step back from considering specific species and consider the broader question of whether or not native plants and trees are less flammable than non-native plants and trees because that is the implication of the FEMA grant applications.

We will start by using one of the measures of fire hazard risk used by the DEIS: **flame lengths.** The DEIS says, *"An 8-foot flame length represents a nationally recognized standard above which erratic fire behavior and difficulty in control and suppression are anticipated."* (DEIS 5.2-1 & 4.3-3) And the DEIS reports the flame lengths of existing vegetation as follows: (DEIS 4.3-8-10)

Vegetation Types (4.3-8-10)	Flame Length (feet)	Nativity
Oak-Bay Woodland	1-34	Native
Monterey pine	2-16	Not Native
Redwood	7-31	Native
Eucalyptus	6-21	Not Native
Northern Coastal Scrub-xeric	14-32	Native
Northern Coastal Scrub-mesic	"less extreme than xeric"	Native
Coyote Brush	14-32	Native
Grassland	2-10	Not Native

Here's what we learn from the DEIS about flame length: **The reported maximum flame lengths of all three non-native vegetation types are shorter than all reported maximum flame lengths of native species.**

Manipulation of the computer model of fire behavior

Despite the flame lengths reported by the DEIS for the existing vegetation in the projects, the DEIS reaches the bizarre conclusion that the post-treatment landscape of exclusively native plants and trees will have shorter flame lengths than the existing vegetation: *"In almost all post-treatment locations flames are predicted to be no greater than four feet in length and to produce only surface fires, with little torching after treatment."* (DEIS Appendix M-13)

The DEIS accomplishes this magical transformation of the native landscape from flammable to non-flammable by changing numbers assigned to key variables to manipulate the computer model used to evaluate fire behavior. Here are just a few examples of how the computer model has been manipulated to reach the desired conclusion:

- The DEIS claims that *"Tree canopy cover is not expected to be changed enough for treatments to alter the category of canopy cover...Where eucalyptus trees are to be removed canopy cover from existing shorter hardwoods is expected to expand."* (DEIS Appendix M-3) Eucalyptus occupies 824 acres, Monterey pine occupies 157 acres of the project area and oak-bay woodland occupies 320 acres. Eucalyptus and Monterey pine will be removed. In other words, the DEIS predicts that the oak-bay woodland will expand into 980+ acres to cover all acres presently forested with non-native trees. (That sounds "invasive" to me.) The *Sunset Western Garden Book* says that coast live oak can grow 25 feet in 10 years and 50 feet in 25 years. Given that rate of growth, it would not be physically possible for existing oak trees to expand to cover an additional 980 acres in centuries, let alone the life of this project. The most interesting aspect of this particular manipulation of the

computer model is that it is based on the fact that **the computer model obviously considers any land shaded by tree canopy cover less flammable than land directly exposed to the sun.**

- The computer model manipulates the fuel models (Appendix M, Table 1) to achieve the desired outcome. These are just a few examples of such manipulation of the fuel models:
    - Non-native trees are assigned lower scores for "moisture of extinction" and higher "heat content" than native trees.
    - "Treated" native trees and vegetation are assigned lower scores for key variables but "treated" eucalypts are assigned the same scores as untreated eucalypts.
- The computer model assumes a constant wind speed of 22 miles per hour. (DEIS 4.1-5) This is an unrealistically low wind speed to model fire behavior of a wind driven fire, as most wildfires in California are. All wildfires in the East Bay in the 20th Century were wind-driven fires with Diablo wind conditions according to the FEMA Technical Report on the 1991 fire. The Technical Report also reported that the Diablo wind that fueled that fire typically has wind speeds of 35-70 miles per hour. If winds of that speed had been used by the computer model, the outcome would probably have been significantly different because everything burns in a wind driven fire. A wind driven fire is indiscriminate in its fuel which would have prevented the computer model from reaching the unrealistic conclusion that a native landscape would be less likely to burn than the existing non-native landscape. Despite the unrealistically low wind speed used in the computer model of fire behavior, the DEIS claims, *"To assess the worst-case scenario, all fire behavior predictions assumed Diablo wind conditions, which are characterized by extremely hot, dry weather and strong winds from the northeast."* (DEIS 4.3-10) The computer model must use a significantly higher speed, or this contradictory statement should be removed from the final EIS. The computer model in the DEIS does not represent Diablo wind conditions.

The DEIS claims that the computer model reaches the conclusion that flame lengths in the post-treatment landscape will be reduced to 2-feet: *"The calculated average flame length under the proposed and connected actions is approximately 2 feet, with 89% of the areas in the low or moderate fire behavior categories.."* (DEIS 5.2-4) This is not a credible conclusion, given that the DEIS predicts a native landscape and the minimum flame length reported for every native vegetation type except oak-bay woodland in the existing landscape is greater than 2 feet. (see DEIS 4.3-8-10) The final DEIS cannot claim on the one hand that native vegetation will revegetate the post-treatment landscape and on the other hand claim that post-treatment flame lengths will be significantly shorter than the flame lengths of native vegetation. This claim of 2-foot flame lengths in the post-treatment landscape is another indication that data used by the computer model has been manipulated to significantly and unrealistically reduce fire hazard in the post-treatment landscape. This claim is inconsistent with the claim that flame lengths in the post-treatment landscape will be less than 4 feet: ***"In almost all post-treatment locations flames are predicted to be no greater than four feet in length and to produce only surface fires, with little torching after treatment."*** (DEIS Appendix M-13) **Neither of these claims is credible, nor are they consistent. If the final EIS continues to make these claims, it must explain how it is physically possible to achieve shorter flame lengths than it reports for the native vegetation which it predicts will remain in the post-treatment landscape.**

The computer model is a black box in which the data can be manipulated in a way that is obscure to the public. It has been used by the DEIS as a means of reaching its desired conclusion, which is to "prove" that native vegetation is less flammable than non-native vegetation. Every "adjustment" of the data variables has increased flammability of non-natives and decreased flammability of natives. We are unlikely to have identified all the ways in which the computer model has been manipulated to reach the desired outcome.

The final EIS must provide evidence to support every "adjustment" that has been made to the computer model, such as moisture, heat content, tree canopy, etc. If such evidence cannot be provided, the "adjustments" should be reversed and the computer model re-run with a higher wind speed consistent with Diablo winds.

What will the post-treatment vegetation be and will it be less flammable than existing vegetation?

We have considered the question of whether or not the post-treatment landscape would be less flammable than the existing landscape, based on the assumption of the DEIS that the post-treatment landscape will be an exclusively native landscape. **Now we will consider the same question, based on our belief that the post-treatment landscape is more likely to be dominated by non-native plants and weeds than native plants.**

I have 15 years of experience observing similar projects all over the Bay Area. Most have been spectacularly unsuccessful in replacing non-native vegetation with native vegetation unless they have been planted intensively, irrigated, and constantly weeded. Most managers of public lands do not have the resources to intensively garden thousands of acres of open space and so their projects inevitably result in weedy messes with few native plants. Despite that personal experience, I will confine my comments to scientific sources, including studies that prove this point empirically: **particularly in an urban setting, replacing a non-native landscape with a native landscape requires intensive gardening effort.**

The proposed projects do not intend to plant anything to replace the non-native trees and shrubs they will destroy unless erosion requires seeding in specific locations where erosion occurs:

> *"The MMPs would **rely on recruitment of native vegetation into the areas where non-native trees have been removed from the over story canopy.** Hydroseeding may be used as an erosion control best management practice, but is not intended to serve as a floral introduction for the purpose of re-vegetation. Rather, hydroseeding would be used as an adaptive management technique in areas at risk of surface erosion from surface rainwater runoff, or in some cases, in areas that fail to establish native vegetative cover under natural recruitment."* (DEIS, 5.1-3)

The DEIS claims that existing native plants and trees will be "recruited" into the acres vacated by 824 acres of eucalypts and 157 acres of Monterey pine. The URS Corporation which was the initial consultant for this project informed FEMA in its letter of May 27, 2010 (Attachment A) that this is an unrealistic expectation:

> *"However, we question the assumption that the types of vegetation recolonizing the area would be native. Based on conditions observed during site visits in April 2009, current understory species such as English Ivy, acacia, vinca, French broom, and Himalayan blackberry would likely be the first to recover and recolonize newly disturbed areas once the eucalyptus removal is complete. These understory species are aggressive exotics, and in the absence of proactive removal there is no evidence to suggest that they would cease to thrive in the area, especially the French broom which would be the only understory plant capable of surviving inundation by a 2-foot-deep layer of eucalyptus chips....It is not clear how the mulch would prevent the proliferation of invasive species while simultaneously encouraging the growth of existing native species. Despite thorough research, we were unable to find documentation of the ability of exotic chip mulch to suppress undesirable species while encouraging favorable species. **It is highly unlikely that the site would naturally restore itself to native***

conditions given the aggressive nature of the weedy exotic species that are already established in the treatment areas and dominate the seed bed."

Despite this very pointed advice from FEMA's consultant, the DEIS assumes that native plants will return to the landscape if non-native plants are eradicated. In fact, regardless of the methods used to eradicate non-native plants the results are the same: **native plants do not return when non-native plants are removed.**

- Spraying herbicides is a popular method of eradicating non-native plants because it is considered the most cost-effective method. In addition to the obvious health risks, the downside of herbicide use is that most (e.g., Roundup) are as likely to kill the natives as the non-natives. This problem is illustrated by a USDA study.[41] **Although the herbicide is assumed to "dissipate" within a few years, the negative effect on the natives persisted 16 years later:** *"...the invasive leafy spurge may have ultimately increased due to spraying. Conversely, several desirable native herbs were still suffering the effects of the spraying,,,"*
- Even when **native** plants are removed, non-native plants occupy the cleared ground. Environmental scientists at UC Berkeley removed native chaparral from experimental plots in Northern California for the purpose of fuel reduction, using two different methods (prescribed burns and mastication), in different seasons, over a period of several years. The result was more non-native plants than the original native landscape: *"We identified 146 species in the third post-treatment year, of which 23% were nonnative and 77% were native...On average nonnative annual grasses composed 13.8% of the total abundance in fire treatments and 47.5% in mastication treatments."*[42]
- A scientist arrived at the same conclusion after attempting to restore oak-studded grassland on Vancouver Island. He tried several different methods of removing invasive grasses for several years only to find that *"...the decline of the native plant species accelerated..."* [43]
- Jon E. Keeley's book about fire in Mediterranean ecosystems concurs: *"...unless burning is accompanied by active native plant restoration, this target will often be replaced by other alien species rather than by more desirable native species."*[44]

We also have local examples that illustrate that natural succession results in predominantly non-native vegetation. Professor Joe McBride of UC Berkeley studied natural succession of vegetation in vacant lots in Berkeley, California.[45] He identified 22 vacant lots in Berkeley, ranked them into 4 classes based on how long they had been vacant, and reported the type of vegetation in each class:

Class	% Forbs	% Grasses	% Shrubs	% Trees	% Bare Ground
<5 years	68.1	25.6	0	0	6.3
5 – 10 years	52.4	43.7	0	0	3.9
11 – 20 years	24.7	75.3	0	0	0
> 20 years	43.8.	34.2	20	2.5	2.0

[41] http://www.ars.usda.gov/is/pr/2009/090630.htm?pf=1
[42] Jennifer Potts and Scott Stephens, "Invasive and native plant responses to shrubland fuel reduction: comparing prescribed, mastication, and treatment season," *Biological Conservation,* 142 (2009) 1657-1664
[43] Andrew MacDougall, University of Guelph, Ontario, Canada, NY Times Magazine, 6/29/08
[44] Jon E Keeley et.al., *Fire in Mediterranean Ecosystems: Ecology, Evolution and Management,* Cambridge University Press, 2011
[45] Joe McBride, "Plant succession on vacant lots in Mediterranean Climate: A case study in Berkeley, California," Council of Educators in Landscape Architecture, conference on Urban Nature, March 30-April 2, 2011 (in press)

Fifty-three of the 67 species of plants found in the vacant lots are "species exotic to California and 24 have been categorized as weeds." The dominant forbs in lots vacant up to 20 years were bur clover, bristly ox tongue, fennel, and plaintain. Dominant grasses in lots vacant from 11-20 years were wild oat and rip gut.

This study of vacant lots is a preview of what we can expect to occupy the bare ground (80% of the project areas that aren't covered with 2 feet of wood chips) of the project areas: non-native weeds for the first ten years, then non-native grasses for the next 10 years. After 20 years, Professor Mc Bride found that coyote brush is the dominant shrub with a few trees.

Here's what Professor McBride predicts for the long-term future:

> *"It is anticipated that older lots would be invaded by Quercus agrifolia (coast live oak) and Umbellularia californica (California bay) along with exotic species such as Prunus cerasifera (cherry plum) and Acacia malanoxylon (blackwood acacia) to form a woodland stage of vacant lot succession in Berkeley.* ***The time required for this succession is estimated to be about 100 years, based on natural succession in the Berkeley Hills."***

Unfortunately, it seems more likely that our oaks will be killed by Sudden Oak Death within 100 years, given its epidemic spread in the East Bay in the past two years, as noted earlier.

The other local example of natural succession despite intensive gardening effort is the roof of the California Academy of Sciences. When the California Academy of Sciences reopened in San Francisco in August 2008, its "living roof" was considered its most unique feature. Thirty species of native plants were candidates for planting on the roof. They were planted in test plots with conditions similar to the planned roof and monitored closely. Only nine species of native plants were selected for planting on the roof because they were the only plants that were capable of self-sowing from one season to another, implying that they were "sustainable." A living demonstration of "sustainability" was said to be the purpose of the living roof.

In February 2011, the Academy published its first monitoring report of the living roof. The monitoring project divided the roof into four quadrants. **After only 2-1/2 years non-natives outnumbered natives in two of the quadrants that are less intensively gardened.** Although natives outnumber non-natives significantly in the other two quadrants, non-natives are also growing in these quadrants.

The journal of the American Society of Landscape Architects reported[46] that the roof is intensively gardened: irrigated, weeded, fertilized, reseeded, and replanted. Indeed, the author of the journal article gave it the title, "High Maintenance Superstar." Yet, despite planting only species of native plants that were suited to the conditions on the roof and despite intensive gardening effort, the roof was dominated by non-native plants within only 2-1/2 years.

Peter Del Tredici has been telling us to expect this result for several years. He is a Senior Research Scientist at the Arnold Arboretum at Harvard University and a Lecturer in the Department of Landscape Architecture at the Harvard Graduate School of Design.

[46] Linda McIntyre, "High Maintenance Superstar," *Landscape Architecture*, August 2009.

In a recent publication[47], he advised the managers of public lands in urban areas to abandon their fantasy that native plants are sustainable in urban settings:

> ***"The notion that self-sustaining, historically accurate plant associations can be restored to urban areas is an idea with little credibility in light of the facts*** *that 1) the density of the human populations and the infrastructure necessary to support it have led to the removal of the original vegetation, 2) the abiotic growing conditions of urban areas are completely different from what they were originally; and 3) the large number of non-native species that have naturalized in cities provide intense competition for the native species that grew there prior to urbanization."*

Sure, he says, **we can grow native plants, but they require at least the same amount of effort as growing any other plant and are therefore just another form of gardening**: *"Certainly people can plant native species in the city, but few of them will thrive unless they are provided with the appropriate soil and are maintained to the same level as other intentionally cultivated plants."*

The proposed project does not intend to plant anything nor does it plan to irrigate or garden. Therefore, we will assume for the purposes of evaluating the fire hazard that 80% of the project acres that aren't covered with wood chips will be populated predominantly by non-native forbs and grasses for about 20 years with shrubs joining the mix after that. The assumption that the existing 320 acres of oak-bay woodland will expand to cover 980 acres of land now occupied by eucalypts and Monterey pines is ridiculous on the face of it.

We will briefly compare the flammability of the likely post-treatment landscape with the existing forest of non-native trees. Using the descriptions of flammability of the existing landscape in the DEIS (4.3-8-10), we will present the key variables in the following table:

Vegetation Types	Flame Length (feet)	Crown Fire	Ignitibility	Other	Nativity
Oak-Bay	1-34	Possible	High if surface fuels are grass or scrub		Native
Monterey pine	2-16				Non-native
Redwood	7-31				Native
Eucalyptus	6-21		Easy		Non-native
Northern Coastal Scrub – xeric	14-32				Native
Northern Coastal Scrub – mesic	Less extreme than xeric				Native
Coyote Brush	14-32	torching			Native
Grassland	2-10		Very ignition prone	Spreads rapidly	Non-native

Drawing from the descriptions of the flammability of existing vegetation types in the proposed project areas provided by the DEIS, we conclude that there is no evidence that either species of non-native tree in the project areas is more flammable than the grassland and scrub which is likely to occupy the bare ground:

- Grass is the most likely vegetation to ignite and fire spreads rapidly through it.

[47] Peter Del Tredici, "Spontaneous Urban Vegetation: Reflections of Change in a Globalized World," Nature and Culture. Winter 2010, 209-315.

- This is consistent with the 1991 Oakland fire which started in grass then jumped to shrubs before becoming a wind driven wildfire, according to the FEMA technical report of that fire: *"On...October 19, 1991...a brush fire was reported...the vegetation on the slope was mostly grass with some brush and a few trees."* (page 22) The fire leapt out of control when a spark reached nearby brush On October 20, 1991: *"Very suddenly, the fire flared up...Burning embers had been carried from one of the hot spots to a patch of tinder dry brush."* (page 26)
- In the past few weeks grass fires in the San Francisco Bay Area have been reported nearly daily. We can see those fires on television news. The flames move rapidly across the grass.
- Jon E. Keeley and colleagues published a study recently about specific wildfires in the Wildland-Urban-Interface (WUI) of California in neighborhoods that are similar to the East Bay hills in topography and vegetation. [48] The authors studied the property damage resulting from specific wildfires in California "...and identified the main contributors to property loss." Keeley and his colleagues found that steep slopes in canyons that create wind corridors were the best predictors of fire damage and that **herbaceous fuels were more likely to spread the fire than woody fuels.**
- Jon E. Keeley testified to the US Senate in 2007, regarding wildfires in California: ***"It is estimated that no more than 3% of the recent 2007 fires...occurred in forests...the remaining 97 percent occurred in lower elevation shrublands and urban areas, burning native shrublands such as chaparral and sage scrub, non-native grasslands, and urban fuels."***

Wind is a more important factor than fuel loads in wildfires in California.

The DEIS is focused on managing fuel loads as the primary means of mitigating fire hazard and we have so far concentrated on responding to that assumption. Now we change gears by questioning that premise. Some fire scientists do not agree that fuel loads are the most important factor in causing wildfires and therefore not the most important factor in reducing fire hazard. This is the counter argument as expressed by Jon Keeley in his book about fire in Mediterranean ecosystems:

> *"Best management practices require accepting the preponderance of evidence and in the case of fires in southern California, it is blatantly clear that age of fuels is not the primary determinant of catastrophic fire losses. The primary problem with ignoring this evidence is that it distracts from real solutions to fire problems in the region, which are not tied to fuel treatments in the wildlands but rather on concentrated effort at the wildland urban interface.* ***In the twenty-first century most agencies in the region have abandoned the idea of trying to create mosaics of fuel age classes as a means of controlling wildland fires."***[49]

Although the proposed project is not in southern California, the post-treatment landscape will be composed primarily of chaparral scrub in a nearly treeless landscape, which will be similar to the chaparral communities of southern California. Coyote brush is the dominant scrub in both southern and northern California wildlands and is likely to dominate the post-treatment landscape as it does the vacant lots of Berkeley. This is how UC Berkeley's 2020 Long Range Development Plan describes the original landscape of the project areas: *"At the time [1868], the hills above the campus were a* ***mix of grassland, oak savannah and open chaparral."*** This is the landscape which this project is trying to recreate.

[48] Alexandra Syphard, Jon E. Keeley, et. al., "Housing Arrangement and Location Determine the Likelihood of Housing Loss Due to Wildire." PLOS ONE, March 18, 2012

[49] Jon E Keeley et.al., *Fire in Mediterranean Ecosystems: Ecology, Evolution and Management*, Cambridge University Press, 2011

Fuel age is a surrogate for fuel load, i.e., the longer it has been since a fire, the greater the fuel load that accumulates. Fire scientists, who don't consider fuel age the most important factor in causing wildfires, consider the foehn winds which are called Santa Ana winds in southern California and Diablo winds in northern California, the prerequisite for wildfires. This key factor in causing wildfires is shared by both southern and northern California.

> *"However, there was only a weak positive relationship between the [Palmer Drought Severity Index] and total area burned (Keeley 2003). The weak relationship between DPSI and fire in this region [Central Coast] is in contrast to stronger relationships observed in other regions of the western U.S. and probably indicates the* ***stronger control exerted by autumn foehn wind events than by fine fuels or fuel moisture levels on wildfire risk*** *in the region (Keeley 2004)."*[50]

According to the FEMA Technical Report of the 1991 Oakland fire, foehn winds were a factor in every wildfire in the East Bay Hills in the 20th Century: 1923, 1970, 1980, and 1991.

The Vesta Project in Australia which we have already cited makes these observations about the role of the wind in wildfires in the dry eucalyptus forest:

- **"Rate of spread is directly related to wind speed** measured at 5 m in the forest above a threshold wind speed of about 5 km h^{-1}."
- **"Rate of spread** is directly related to characteristics of the surface fuel bed and understory layers but **is only weakly related to fuel load alone."**
- **Wind speed above the tree canopy is greater than wind speed near the forest floor by a ratio of 3:1.**
- "...unlike wind flow in the open, **gusts do not persist for very long beneath the canopy**."

The tall trees are a barrier to the wind which slows the progression of a wind driven fire. Even the California Native Plant Society agrees that a windbreak provides protection from a wind driven fire:

> *"As a former aerospace engineer, it also occurred to me that clearing all vegetation around a home actually created the perfect condition for the high winds that accompany large fires to flow unperturbed (laminar flow). There was no longer any barrier to create turbulence or interference and slow down the 80 mph bone-dry winds laden with cinders as thick as the fire falls of Yosemite."*[51]

The DEIS does not acknowledge that the tall trees that will be destroyed in the project areas are providing a wind break which can slow or stop a wind-driven fire. This is an important consideration in evaluating the claimed reduction in wildfire risk and must be analyzed by the final EIS.

Two studies of actual wildfires in California report that wind is a key factor. In 1987, 20,000 hectares burned in a wildfire in the Shasta-Trinity National Forest. The effects of that fire on the forest were studied by Weatherspoon and Skinner of the USDA Forest Service.[52] **They found the least amount of fire damage in those sections of the forest that had not been thinned or clear-cut.** In other words, **the more trees there were, the less damage was done by the fire.** They explained that finding:

[50] Neil Sugihara et. al., *Fire in California Ecosystems,* University of California Press, 2006, page 322

[51] Greg Rubin, "Wildfire Safety: Lessons Learned from Southern California," *Fremontia,* Vol. 38: 2/38.3

[52] Weatherspoon, C.P. and Skinner, C.N., "An Assessment of Factors Associated with Damage to Tree Crowns from the 1987 Wildfires in Northern California," Forest Science, Vol. 41, No 3, pages 430-453

"The occurrence of lower Fire Damage Classes in uncut stands [of trees] probably is attributable largely to the absence of activity fuels [e.g., grasses] and to the relatively closed canopy, which reduces insolation [exposure to the sun], wind movement near the surface, and associated drying of fuels. Conversely, opening the stand by partial cutting adds fuels and creates a microclimate conducive to increased fire intensities."

In other words the denser the forest,

- **The less wind on the forest floor, thereby slowing the spread of fire**
- **The more shade on the forest floor**
    - **The less flammable vegetation on the forest floor**
    - **The more moist the forest floor**

All of these factors combine to reduce fire hazard in dense forest. **The proposed project will result in highly flammable conditions by eliminating the windbreak, shade, and moisture on the forest floor.**

Keeley's most recently published study[53] of specific wildfires in the Wildland-Urban-Interface (WUI) of California also found the same relationship between wind corridors and spread of wildfires The authors studied the property damage resulting from specific wildfires in California "...and identified the main contributors to property loss." Here are some of their findings:

- **"...property loss was most likely in areas of historical high fire frequency, which corresponded with wind corridors."**
- "Structures located near the edges of developments, or in housing clusters on steep slopes, were also more susceptible."
- **"...property loss was more or as likely to occur within herbaceous fuel types than within the higher fuel-volume woody types that are typically considered as the most hazardous fuels."**

For emphasis, I reiterate that these studies of wildfires in California suggest that the proposed project will not reduce fire hazard in the East Bay hills. Rather, it is more likely to increase fire hazard by eliminating most of the wind break provided by the forest so that the surrounding community—which is on steep slopes--is subjected to more wind and by replacing woody fuels with herbaceous fuels.

The federal Environmental Protection Agency (EPA) submitted a public comment at the time of the scoping process which recommended that tall trees not be destroyed by the proposed projects:

> *"EPA recommends that FEMA commit to limiting tree-removal to only non-native species for all four hazard mitigation projects evaluated in the Environmental Impact Statement (EIS).* ***Include a commitment to leave trees greater than a specific DBH in size****, and identify how this would be implemented.* ***Diameter and height are, in effect, measures of tree resistance to fire damage.*** *Large diameter trees are generally more able to withstand wildfire, assuming that surface and ladder fuels have been reduced and the severity of fire is not extreme.* ***By leaving the largest trees and treating the surface and ladder fuels, fire tolerant forest conditions can be created.****"* (DEIS, Appendix K2)

[53] Alexandra Syphard, Jon W. Keeley, et. al., "Housing Arrangement and Location Determine the Likelihood of Housing Loss Due to Wildire." PLOS ONE, March 18, 2012

FEMA must take this advice into consideration in the final EIS. If the final EIS continues to ignore this advice from FEMA's sister agency—which is responsible for protecting our environment—there must be justification for ignoring it and scientific evidence to support that justification. **If the advice of the EPA had been followed, the existing windbreak provided by the tall non-native trees would not be compromised by the proposed project.**

The proposed projects will increase fire hazards in the East Bay

We have provided both scientific and observational evidence that support the conclusion that the proposed projects will increase fire hazards in the East Bay by:

- Distributing tons of flammable dead wood on 1,000 acres of public land
- By conducting prescribed burns that add to the risk of igniting a wildfire
- By encouraging a more flammable landscape of grassland, chaparral, and oaks which are dying of Sudden Oak Death
- By eliminating shade and moisture which reduce the probability of ignition.
- By eliminating the windbreak provided by tall trees that will not be replaced by tall trees

Therefore, this project—as presently defined--cannot be funded by FEMA grants which are for the stated purpose of reducing fire hazards.

Part II: The proposed projects will damage the environment by significantly increasing the emission of greenhouse gases both immediately and for the long-term

The DEIS analysis of greenhouse gas emissions resulting from the proposed projects is completely inadequate because:

- It does not identify all sources of emissions
- It does not acknowledge or quantify the loss of the ability of the existing forest to continue to sequester carbon in the future
- It provides inadequate information to evaluate the accuracy of the calculations provided
- It misrepresents or misinterprets scientific studies regarding carbon loss resulting from forest fuel treatments
- It does not acknowledge or comply with California law (AB32) requiring reduction in greenhouse gas emissions

The DEIS grossly underestimates loss of carbon resulting from the proposed projects.

Only 15% of carbon storage in the existing forest has been quantified by the DEIS

The DEIS quantifies only two sources of carbon dioxide emissions: the fossil fuels used by motorized equipment during the project and the trunks of the trees greater than 5" DBH that will be destroyed. Calculating loss of stored carbon based solely on the trunks of the trees that will be destroyed **excludes** the following sources of stored carbon in the forest: the understory, the forest floor layer (e.g., duff and litter), the bark, roots, and branches of the trees, and the soil. RA Birdsey of the US Forest Service reports that **only 15% of total carbon stored in forest ecosystems in the United States is contained in the trunk:**[54]

[54] "Carbon Changes in US Forests," RA Birdsey and LS Heath, US Forest Service Gen. Tech. Report RM-GTR-271, 1995

Allocation of carbon in forest ecosystems and trees
US forests, 1992

1%	foliage	
5%	roots	
15%	bole (trunk)	
9%	other wood above ground	
	30%	tree
	61%	soil
	8%	forest floor
	1%	understory
	100%	Total

Although the soil will remain when the trees are destroyed, **there is scientific evidence that there will be some loss of soil carbon as a result of this project**: *"...a major forest disturbance, such as a clearcut harvest, can increase coarse litter and oxidation of soil organic matter. The balance of these two processes can result in a net loss of 20% of the initial carbon over a 10-15 year period following harvest."*[55] The destruction of all non-natives trees on the properties of UCB and the City of Oakland and 90% of the trees on the property of EBRPD, surely qualifies as a "major forest disturbance" which will result in loss of carbon stored in the soil of the forest.

Carbon released by prescribed burns must be quantified

East Bay Regional Park District plans to chip the trees that are destroyed and distribute them on 20% of the project areas to a depth of 4-6 inches. They plan to burn the wood that cannot be distributed on the ground without exceeding these limits. This excess wood will be burned in piles. In addition to pile burns, EBRPD also plans to conduct broadcast burns for the purpose of destroying non-native vegetation and vegetation debris considered potential fuel for a fire.

The DEIS does not quantify the carbon that will be released by these burns, citing an EPA policy of 1996: *"It should be noted that the emission of CO_2 from burning has not been calculated since the removal of the vegetation would allow new vegetation to grow, eventually consuming at least a portion [of] the CO_2 released during burning, as noted in EPA emission factor guidance (EPA 1996)"*

This EPA policy regarding CO_2 emissions from prescribed burns has been revised to include carbon emissions from prescribed burns. In response to climate change, the EPA established an "Emission Inventory Improvement Program" (EIIP) in 1997. Since then, the EIIP has continuously expanded and improved the National Emissions Inventory (NEI). The NEI for 2008 is available on the EPA website. **It includes reporting of CO_2 emissions resulting from prescribed burns.** Data for each type of emission is available on line. It can be sorted by state. The 2008 NEI reports that the State of California emitted 2,156,547 tons of carbon dioxide from prescribed burns in 2008.[56]

[55] "Carbon Changes in US Forests," RA Birdsey and LS Heath, US Forest Service Gen. Tech. Report RM-GTR-271, 1995
[56] http://www.epa.gov/ttn/chief/net/2008inventory.html

Obviously, the DEIS is mistaken in its outdated claim that the EPA excludes emissions from prescribed burns from calculations of greenhouse gas emissions. Therefore, the final EIS must quantify CO_2 emissions resulting from the prescribed burns required by the proposed projects.

Unexplained reductions in emissions data which contribute to underestimates of greenhouse gas emissions

We can identify **two unexplained reductions in emissions reported by the DEIS** which significantly reduce the emissions reported by the DEIS:

(1) The DEIS reports carbon emissions from decaying wood in the proposed project areas alone, then claims it is reporting for both proposed and connected areas .

Tables 4.7-2 and 4.7-3 are clearly labeled "Proposed Project Areas." Since the acres of (most) vegetation types reported in 4.7-2 are significantly lower than acres of vegetation types reported for proposed and connected project areas in Table 4.2-1, we have some confidence that Tables 4.7-2 and 4.7-3 are accurately labeled.

The DEIS then uses the data in these two tables to calculate carbon loss on page 5.6-7: *"Using...the CO_2 equivalent sequestered in the baseline condition (see Table 4.7-3)...the annual average CO_2e rate from the decay of woody material would be 1,500 metric tons per year over the 10-year program period."* (DEIS 5.6-7)

In the following paragraph, the DEIS adds this reported 1,500 metric tons of CO_2e emissions to reported emissions from motorized equipment and describes the total as emissions from "proposed and connected actions:" *"In total, GHG emissions would be roughly 2,050 metric tons per year (550 metric tons per year from treatment under the proposed and connected actions plus 1,500 metric tons from annual decomposition)..."*

In other words, the DEIS has underestimated tonnage of CO_2 emissions from decaying wood by reporting only carbon stored in the proposed acres and then claiming that it is reporting for the proposed and connected acres. This error must be corrected in the final EIS.

(2) Furthermore, in addition to claiming that emissions from only proposed acres are actually emissions for both proposed and connected acres, the DEIS divides emissions from decaying wood by 4. **The DEIS provides no explanation for reporting only 25% of emissions from decaying wood:** "...assuming that **one-fourth** of the CO_2e sequestered in the baseline condition was trimmed or chipped and left on site..."

The DEIS describes the disposition of dead wood from the destruction of the trees as follows:

UCB & City of Oakland: *"Felled trees up to approximately 24 inches in diameter at breast height would be cut up into chips 1 to 4 inches long and the chips would be spread on up to 20% of each site to a maximum depth of 24 inches....Branches from trees greater than 24 inches DBH would be cut up and scattered on the site...The trunks of these trees would typically be cut into 20 to 30 foot lengths. Some tree trunks would be placed to help control sediment and erosion or support wildlife habitat. Some tree trunks may be moved to an adjacent portion of the hillside or chipped for use as fuel, a source of paper pulp, or horse bedding."* (DEIS ES-11)

In other words, virtually all of the dead wood would be distributed on site either as chips or as logs. It will all decay and it will all release its stored carbon into the atmosphere as carbon dioxide as it decays. **There is therefore no justification for reporting only 25% of the stored carbon in the trees as carbon dioxide emissions.**

Granted, the carbon stored in large branches and huge logs will take longer to decay than the wood that is chipped, but it will decay and it will therefore release carbon dioxide into the atmosphere. However, David Nowak of the US Forest Service reports that whatever the disposition of the dead wood, 50% of carbon stored in trees is lost within 3 years of their destruction: *"Although no mulch decomposition studies could be found, studies on decomposition of tree roots and twigs reveal that 50% of the carbon is lost within the first 3 years. The remaining carbon is estimated to be lost within 20 years of mulching. Belowground biomass was modeled to decompose at the same rate as mulch regardless of how the aboveground biomass was disposed"*[57]

According to the DEIS, the East Bay Regional Park District will distribute wood chip mulch on 20% of the project area to a depth of 4-6 inches and pile burn any excess wood. The more shallow mulch layer will decompose more quickly, as we learned from URS Corporation (Attachment A) and the carbon will be released immediately from pile burns.

Loss of the ability of the existing forest to sequester carbon in the future is not quantified

In addition to the grossly underestimated loss of carbon stored in the existing forest ecosystem, **the DEIS does not quantify the loss of the ability of the existing forest to sequester carbon in the future.** The DEIS acknowledges that the post-treatment landscape will be less capable of sequestering carbon than the existing landscape:

> *"The proposed and connected actions would also be self-mitigating to some degree in the absence of a wildfire, because native vegetation would partially replace the non-native vegetation removed. However, the planned growth of oak and bay woodlands and successional grassland containing shrub islands would not sequester as much carbon as the larger eucalyptus and pines and the denser coastal scrub that would be removed."* (DEIS 5.6-11)

The final EIS cannot claim that legal thresholds for carbon loss are not violated without quantifying this decrease in the ability to sequester carbon.

Blue gums live in Australia from 200 to 500 years.[58] They live toward the longer end of the range in milder climates such as the San Francisco Bay Area. Most Blue Gum eucalypts were planted in the East Bay between 1886 and 1913, according to David Nowak of the US Forest Service.[59] Therefore, they are not more than 130 years old. **They can be expected to continue to sequester carbon for at least 100 years and perhaps 300 years.**

The native trees that the proposed projects claim will occupy the ground now occupied by non-native trees are significantly smaller than the existing trees. Since carbon sequestration and storage are proportionate to biomass, the native trees will not compensate for the loss of the ability of the existing forest to sequester carbon. **The DEIS reports in**

[57] Nowak, David, et.al., "Effects of urban tree management and species selection on atmospheric carbon dioxide," Journal of Arboriculture 28(3) May 2002

[58] *Eucalypt ecology: Individuals to ecosystems,* by Jann Elizabeth Williams, John Woinarski ,Cambridge University Press, 1997

[59] David Nowak, "Historical vegetation change in Oakland and its implications for urban forest management," *Journal of Arboriculture,* 19(5), September 1993,

Table 4.7-1 that the oak-bay woodland in the project areas is storing only 8.97 metric tons of CO_2e per acre, compared to 325.91 metric tons per acre in the eucalyptus forest and 184.61 metrics per acre in the Monterey pines.

Furthermore, the predominant native tree is being killed by Sudden Oak Death at an epidemic rate, so its future is both unlikely and unknown.

The final EIS must substantially revise its report of carbon loss from the proposed projects by:

- Reporting carbon released from the entire forest ecosystem that will be destroyed by the proposed projects
- Reporting carbon released by prescribed burns
- Reporting carbon loss from both proposed and connected project areas
- Reporting the amount of carbon stored in all wood, not just the carbon in wood chips
- Reporting the loss of the ability to sequester carbon in the future

The DEIS provides inadequate information to evaluate its calculation of greenhouse gas emissions

The final EIS should provide more information about the number of trees that will be destroyed as well as more information about the test plots that were used to calculate carbon storage

The DEIS provides little information regarding the number of trees that will be destroyed by the proposed projects. With the exception of the three project areas on the property of UC Berkeley, the DEIS provides no information regarding the number of trees that will be destroyed. The public deserves an estimate of the total number of trees that will be destroyed by the proposed projects.

Without such an estimate of the number of trees that will be destroyed, the public cannot judge the accuracy of carbon loss reported by the DEIS. In Table 4.7-1, the DEIS reports the amount of carbon stored in 4 types of forest--eucalyptus, Monterey pine, oak-bay, and redwood—based on small test plots of those types of trees. The DEIS provides no information about the number of trees or their sizes.

Without any information about the number of trees that will be destroyed the reader has no information about the density of the trees on the acres of the project areas. And without any information about the number or sizes of the trees found in the test plots upon which carbon storage was calculated, the reader is unable to evaluate the accuracy of reported carbon loss.

In other words, the reader cannot determine how many trees will be destroyed, nor can the reader determine if the test plots are representative of the total forest, nor can the reader determine if reported carbon loss is realistic. This reader respectfully requests more information in the final EIS:

- Please provide an estimate of the total number of trees that will be destroyed by this project.
- Please provide the number and sizes of the trees on the test plots upon which carbon loss was calculated.

The DEIS misrepresents or misinterprets scientific studies regarding carbon loss resulting from fuel reduction treatments.

The DEIS sets up a false dichotomy to support its claim that the FEMA projects will not increase carbon dioxide emissions. It offers a false choice between theoretical carbon loss from a wildfire vs. carbon loss from destruction of the non-native forest. **This false choice violates both federal and state law regulating environmental impact studies because the measure of environmental impact as defined by those laws require that the study compare the existing, baseline condition to the potential impact resulting from the proposed project. In other words, the existing condition is the forest that exists now, not a theoretical forest that has been destroyed by fire.**

Compounding its error, the DEIS tries to support its false dichotomy by misinterpreting or misrepresenting scientific studies:

> *"Studies indicate that if a wildfire occurs, the proposed type of vegetation management sequesters more carbon in the long term than leaving the sites untreated. Two wildfire modeling studies indicated that thinning would reduce damage caused by wildfires, allowing faster regrowth after a fire (Hurteau and North 2010; Wiedinmyer and Hurteau 2010). The Wiedinmyer and Hurteau (2010) study included the use of prescribed burning as a treatment method."* (DEIS 5.6-11)

In fact, **these studies don't say what the DEIS claims they say:**

In "Prescribed fire as a means of reducing forest carbon emissions in the Western United States,"[60] (Wiedinmyer and Hurteau 2010) the authors compare carbon loss from prescribed burns with carbon loss from wildfires in the same locations and reach the conclusion that prescribed burns result in less carbon loss than wildfires without prescribed burns. However, the prescribed burns the authors studied were restricted to the understory and did not include any trees: *"The fraction of fuel consumed in prescribed fires was applied only to the surface fuel fraction (including herbaceous, fine, and coarse fuels of the total fuel loading model...);* ***no live or standing dead trees are assumed to burn in prescribed fires."*** **Therefore, this study is not applicable to the proposed project which intends to burn the remains of hundreds of thousands living trees** which will obviously release far more carbon into the atmosphere than the prescribed burns in this study as well as reduce carbon sequestration into the foreseeable future.

In "Carbon recovery rates following different wildfire risk mitigation treatments," [61] (Hurteau and North 2010) the authors compare several different methods of fuel reduction with respect to how long it takes for the forest to recoup the carbon loss from those methods. **It finds that the forest is unable to recoup the loss of carbon when the destruction of the overstory canopy is the method used because of the large amount of carbon stored in large trees:** *"Overstory tree thinning treatments resulted in a large carbon deficit and removed many of the largest trees that accumulate the most carbon annually, thereby increasing carbon stock recovery time."* In fact, this is precisely the method that will be used by the proposed project. Therefore, **this study makes the point that this project will permanently reduce the ability to sequester carbon by destroying large trees that will not be replaced.** In other words, **this study contradicts rather than supports the assumptions of the DEIS regarding carbon storage.**

In "High-severity wildfire effects on carbon stocks and emissions in fuels treated and untreated forests," [62] (North and Hurteau 2011) the authors compare carbon loss from wildfires in a thinned forest (both loss from treatment and loss from subsequent wildfires) with carbon loss from wildfires in the same locations without thinning. They conclude that

[60] Christine Wiedinmyer and Matthew Hurteau, "Prescribed Fire as a Means of Reducing Carbon Emissions in the Western United States," *Environmental Science Technology, 2010, 44, 1926-1932*

[61] Matthew Hurteau and Malcolm North, "Carbon recovery rates following different wildfire risk mitigation conditions," *Forest Ecology and Management,* 260 (2010) 930-937

[62] Malcolm North and Matthew Hurteau, "High severity wildfire effects on carbon stocks and emissions in fuels treated and untreated forests," *Fire Ecology and Management, 261 (2011) 1115-1120*

such thinning results in more total carbon loss than wildfires without such thinning in the short run. However, because more trees remain after wildfire in a treated forest, the ability of the forest to sequester carbon in the long term can recoup much of the loss of the treatment. The forests they are considering have average densities of 1,536 stems per hectare and thinning is limited to stems of less than 18 inches in diameter. This study is therefore not relevant to the proposed project because the forests in the proposed project are significantly less dense and are being completely destroyed by UCB and Oakland and more drastically thinned by EBRPD compared to the study. In other words, **a much greater percentage of total carbon storage will be lost by the proposed projects in the short run because a higher percentage of total trees will be destroyed, including all large trees which store more carbon than smaller trees. In addition much more capability to sequester carbon will be lost in the long run because few large trees will remain.**

All of these studies have in common that they have measured all sources of carbon in the forest: carbon in the soil and roots, in the branches and leaves, in the understory, in the duff and leaf litter. In contrast, the DEIS quantifies only the amount of carbon stored in the trunks of the trees. All other sources of carbon are ignored. Furthermore, the DEIS does not quantify the loss of the ability of the forest to sequester carbon in the future.

The DEIS also misquotes North and Hurteau (2011) as follows: *"A key finding of this study was that the subsequent loss of trees in the untreated areas after the fire was out generated a greater loss of carbon to the atmosphere than the initial thinning practices and wildfire damage in the treated areas."* (DEIS 5.6-11)

In fact, this study says exactly the opposite: "We found that treatments did reduce wildfire emission by 57% but **when carbon removed from the site during treatment (50.2Mg C ha^{-1}) is added to wildfire emissions, the total carbon loss is greater in fuels treated (80 Mg C ha^{-1}) than untreated (67.8 Mg C ha^{-1}) forest."**

Furthermore, North and Hurteau do not support the DEIS statement, *"Thus, the proposed and connected actions would be self-mitigating if a wild fire occurs."* (DEIS 5.6-11) The DEIS reports that North and Hurteau found that treated areas will have more carbon remaining in living trees after a fire than the untreated areas after a fire. The fires killed 97% of the trees in the untreated areas and only 53% in the treated areas. This recovery of carbon sequestration was possible in the study because the forest was thinned of small trees, rather than completely destroyed as it will be in the projects of UCB and Oakland. Large trees will not be available post-treatment to recover the ability to sequester carbon as they were in the study. There will be no mitigation in the East Bay projects because all tall trees will be destroyed.

The DEIS also attempts to confuse the reader by introducing the albedo effect. The DEIS claims that forests warm the atmosphere more than the lower vegetation which will replace the forests because forest canopies absorb more sunlight than the lower vegetation. The implication of this observation is that albedo effect will counteract the warming of the ground when the shade of the canopy is destroyed: *"Forests and woodlands tend to absorb sunlight more and reflect sunlight less than open space and might be expected to have higher air temperatures than open ground."* (DEIS 4.7-15)

The DEIS claim, if followed to its logical conclusion, implies that, because of the albedo effect, all forests should be destroyed to counter global climate change, a truly bizarre position for the applying agencies to take. Surely they don't really believe it.

This is a smokescreen that has been used unsuccessfully by other economic interests that wish to destroy the forest, such as the timber industry. Here is how scientists responded to this claim:

"Because forests are generally attributed a low albedo (as the majority of the ultraviolet and visible spectrum is absorbed through photosynthesis), it has been erroneously assumed that removing forests would lead to cooling on the grounds of increased albedo. Through the evapotranspiration of water, trees discharge excess heat from the forest canopy. This water vapour rises resulting in cloud cover which also has a high albedo, thereby further increasing the net global cooling effect attributable to forests." [63]

Whatever heat may be generated by absorbed sunlight at the outer edge of the canopy is used by photosynthesis and evapotranspiration. The heat does not reach ground level, where the shade of the canopy cools the forest floor. This is acknowledged by the DEIS: *"...the upper canopy tends to capture a substantial portion of the sunlight, limiting the amount of energy reaching the lower branches and ground vegetation. This limits the amount of photosynthesis in the lower levels as well as reduces the air and soil temperatures under the canopy relative to pen ground."* (DEIS 4.6-15)

The shaded forest floor suppresses the growth of herbaceous understory which ignites easily, spreads fire rapidly, and can provide ladder fuel to the tree canopy. The shaded forest floor is therefore a means of reducing fire hazard and the elimination of the shade by the proposed projects is one of many reasons why fire hazards will be increased by these projects.

Reducing fuel loads causes carbon loss without reducing fire hazard

As we have said, the DEIS uses the potential for wildfire as a justification for the proposed project, based on speculation that a wildfire would cause loss of stored carbon. We have also said that this is not a valid legal argument because environmental impact must be evaluated by comparing the proposed project to existing conditions, not to some theoretical condition, such as a forest destroyed by wildfire.

Furthermore, **a recently published study corroborates that thinning the forest does not significantly reduce fire risk, nor does it increase carbon storage in the forest**[64]

"It has been suggested that thinning trees and other fuel-reduction practices aimed at reducing the probability of high-severity forest fire are consistent with efforts to keep carbon (C) sequestered in terrestrial pools, and that such practices should therefore be rewarded rather than penalized in C-accounting schemes. By evaluating how fuel treatments, wildfire, and their interactions affect forest C stocks across a wide range of spatial and temporal scales, we conclude that this is extremely unlikely. ***Our review reveals high C losses associated with fuel treatment, only modest differences in the combustive losses associated with high-severity fire and the low-severity fire that fuel treatment is meant to encourage, and a low likelihood that treated forests will be exposed to fire.*** *Although fuel-reduction treatments may be necessary to restore historical functionality to fire-suppressed ecosystems,* ***we found little credible evidence that such efforts have the added benefit of increasing terrestrial C stocks."***

Thinning the forest will not reduce fire hazard. Nor will it prevent loss of stored carbon.

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[63] http://en.wikipedia.org/wiki/Albedo#Trees

[64] John L. Campbell, Mark E. Harmon, Stephen R. Mitchell, "Can fuel-reduction treatments really increase forest carbon storage in the western US by reducing future fire emissions? Frontiers in Ecology and Environment, 2011, 10,1890/110057.

The DEIS does not acknowledge California law (AB32) requiring reduction in greenhouse gas emissions

The DEIS says that *"FEMA has determined that a proposed action must meet the criteria listed below to be eligible for funding under [Hazard Mitigation Assistance grant programs]"* (DEIS 2-2). One of the criteria that are listed is: *"Meet the requirements of applicable local, tribal, state, and federal laws; implementing regulations; and executive orders."* (DEIS 2-3)

The proposed project violates California law:

> **California Executive Order S-3-05: The Executive Order established the following goals: GHG emissions should be reduced to 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050.**

The proposed project will release thousands of tons of carbon stored in the non-native forest, releasing thousands of tons of carbon dioxide into the atmosphere as the wood decays on the forest floor or is burned in pile burns by EBRPD. The project will also permanently reduce the capability of the non-native forest to sequester carbon for at least 100 years into the future. This loss of carbon sequestration capability is not compensated for by any planting by the proposed project. The project offers no mitigation for these increases in greenhouse gas emissions. Therefore, the project violates California law. If the final EIS is unable to identify sufficient mitigation for these enormous increases in greenhouse gas emissions consistent with the requirements of California law, the public will surely challenge the legality of the proposed projects.

Part III: The proposed projects will damage the environment by dousing public lands with thousands of gallons of toxic herbicides

The information and analysis provided by the DEIS regarding herbicides required to implement the proposed project is inadequate:

- **Inadequate information** is provided regarding herbicides required for the proposed project
- **Inaccurate information** is provided regarding herbicides required for the proposed project
- Information regarding herbicides required for the proposed project is **not credible**
- **Analysis** of the consequences of herbicides required for the proposed project **is inadequate**

Inadequate information regarding herbicides required for the proposed project is provided by the DEIS

The DEIS informs us that herbicides will be used to prevent eucalyptus and acacia that will be destroyed from resprouting. We are told that between 1 – 2 ounces of herbicides will be applied to the stump shortly after the tree is cut down. It also claims that only 5% of the trees will require retreatment to accomplish the goal of killing the roots of the trees. The DEIS provides no information about the number of trees that will be destroyed of each species, which means we have no way of knowing how much herbicide will be required to implement the project.

The DEIS informs us that herbicides will also be foliar sprayed to eradicate non-native shrubs such as broom in the project areas. The DEIS provides no information about the quantity of herbicides that will be required to accomplish this task.

The DEIS describes four herbicides that will be used for this project and a brief description of their properties: Garlon 3A, Garlon 4 Ultra, Stalker, and Roundup. (DEIS, Appendix L) However, the DEIS provides no consistent information regarding which products will be used for which of the two purposes: cut stump treatment and foliar spraying.

The DEIS reports that *"UCB provided herbicide-use records for the past 10 years (Klatt 2011b)." (DEIS 4.5-18)* However, this document is listed as a "personal communication" in the DEIS References. Therefore, it is not available to the public. Given that UCB has destroyed approximately 18,000 trees in the past 10 years,[65] these records of herbicide use during that period of time are needed to evaluate requirements for future herbicide use for the proposed project. If, for example, 1,000 gallons of Garlon were needed to treat and retreat 18,000 trees destroyed in the past 10 years, we can anticipate that 3,000 gallons of Garlon will be needed to treat and retreat the 54,000 trees that UCB intends to destroy in the proposed project. That would amount to 7 ounces per trees, far more than the DEIS estimate of 1 – 2 ounces per tree.

The quantity of pesticide to be used is crucial. The EPA mandated Specimen Labels for Garlon 3A and Garlon 4 specify maximum use rates for these products when used on stumps of trees:

- The Specimen Label for Garlon 3A says, *"Individual plant treatments such as basal bark and cut surface applications may be used . . . at a maximum use rate of 2.67 gallons of Garlon 3A (8 lb ae of triclopyr) per acre."*[66]
- The Specimen Label for Garlon 4 says, *"Individual plant treatments such as basal bark and cut surface applications may be used on any use listed on this label at a maximum use rate of 8 lb ae of triclopyr per acre," where acid equivalent (ae) is given by "Acid equivalent: triclopyr – 44.3% - 4lb/gal."*[67]

Thus the maximum use rate for Garlon 3A is 2.67 gallons per acre, and the maximum use rate for Garlon 4 is 2 gallons per acre.

Compare the DEIS estimate of 1 – 2 ounces of pesticide per stump with the mandated maximum use rates. The tree density on UCB properties in the project areas can be estimated: 54,000 trees / 284.3 acres = 190 trees/acre. If 2 ounces of Garlon are needed per tree, 190 trees per acre will require 380 oz or 2.97 gallons/acre of pesticide. **This rate exceeds the maximum use rates for both Garlon 3A and Garlon 4.**

The following information is needed in the final EIS to evaluate the environmental impact of herbicides used by the proposed project:

- Please provide the number of eucalypts and acacia that will require cut-stump treatment and the type of herbicide that will be used for that purpose.
- Please provide the volume and type of herbicide that will be foliar sprayed on non-native shrubs.
- Please provide UCB's reports of pesticide use for the 10-year period, 2002-2012.

Inaccurate information is provided regarding herbicides required for the proposed project

The DEIS claims that, *"The herbicides used [by UCB] included glyphosate applied to a cut stump spray, imazapyr applied as a basal bark spray, triclopyr applied using a foliar low pressure..."* (DEIS 4.5-18) This statement is contradicted by

[65] Tom Klatt, "Fire Mitigation Program, Annual Report 2005," University of California, Berkeley
[66] http://www.cdms.net/LDat/ld0AU007.pdf
[67] http://www.cdms.net/ldat/ld0B0013.pdf

UCB's "Hill Area Fire Fuel Management Program,"[68] which states that only Garlon with the active ingredient triclopyr is used for UCB's fuel management programs. This is a significant contradiction between UCB's written plans and the DEIS because triclopyr is significantly more toxic, more persistent in the environment, and more mobile in the soil than glyphosate, which is known to be ineffective for stump treatment to prevent resprouting of eucalyptus. It therefore misrepresents the hazards of the proposed projects and must be corrected in the final EIS.

The DEIS informs us of the pesticide use policies of the City of Oakland. The DEIS is not responsible for inaccurate statements made in those policies, but I will make this public record of those inaccuracies, which should be noted in the final DEIS:

- *"When glyphosate and triclopyr are applied in this manner [direct application to cut stump], the herbicide is absorbed within the plant or tree's system and does not migrate into the surrounding soil."* (DEIS 4.5-18) This statement is not true. Triclopyr is taken up by the roots and distributed throughout the root system of the plant or tree. Studies have shown that herbicides migrate from the root system of the target tree to the root system of adjacent plants and trees with which its roots are intermingled.[69]
- *"Both glyphosate and triclopyr have received the lowest ranking [by the EPA] for toxicity or a Category 4."* (DEIS 4.5-19) This statement is not true. The EPA ratings are:
    - Glyphosate: Oral and dermal acute toxicity: Category III (slightly toxic)[70]
    - Triclopyr (BEE & TEA): Oral and dermal acute toxicity: Category III (slightly toxic); (TEA) Primary eye irritation: Category I (corrosive); (BEE) Primary eye irritation: Category III (minimally irritating)[71]
    - Further, the ratings for imazapyr include: Acute dermal toxicity: Category III (slightly toxic); Acute inhalation toxicity: Category II (moderately toxic); Acute eye irritation: Category I (corrosive)[72]
- For the record, we will also note that Oakland's policy regarding herbicide use is contradictory. On the one hand it claims that "herbicide use is limited to the use of glyphosate and triclopyr" and on the other hand it announces that it is using imazapyr in a "demonstration project." In other words, Oakland has a policy that theoretically limits herbicide use to specific products, but it also gives itself permission to use other products when it wishes to, calling them "demonstration projects:" *"The herbicide mixture would likely consist of a combination of Garlon 4 (triclopyr) and Stalker (imazapyr)..."* (DEIS 4.5-19) The law does not require that the combination of multiple pesticides be tested for toxicity. Therefore, there is no information regarding the toxicity of such combinations. The risks of these combinations are unknown.

The DEIS reports on pesticide use by EBRPD based on their annual reports for 2007 and 2008. EBRPD's pesticide use report for 2009 has been available since March 2011 and for 2010 since September 2011. In other words, these reports were available while the DEIS was being prepared and are a more accurate reflection of EBRPD's current pesticide use because they reflect the increased pesticide use required to implement EBRPD's "Wildfire Hazard Reduction and Resource Management Plan" which was approved in 2009. These are the significant differences between more current reports and the outdated reports cited by the DEIS:

[68] University of California, Berkeley, "2020 Hill Area Fire Fuel Management Program," 2003

[69] Stott W. Howard, *Chemical Control of Woody Plants, Stumps, and Trees,* Washington State University, 1993

[70] http://www.epa.gov/oppsrrd1/REDs/old_reds/glyphosate.pdf

[71] http://www.epa.gov/oppsrrd1/REDs/2710red.pdf

[72] http://www.epa.gov/oppsrrd1/REDs/imazapyr_red.pdf

- **EBRPD reported a 300% increase in pesticide use for "Priority Resource Projects" in 2009** (see Table 4). "Resource Projects" is the euphemism used by EBPRD to describe its efforts to eradicate non-native species such as pampas grass, thistle, broom, and eucalyptus.
- Unlike earlier reports described by the DEIS, reports for 2009 and 2010 inform us of the volume of imazapyr and clopyralid used on an "experimental" basis: 203 gallons of imazapyr were used in 2009 and 121 gallons in 2010; 16 gallons of clopyralid were used in 2009. (see Table 3) Neither of these products has been approved for use by EBRPD. They have been used on an "experimental" basis at least since 2007. Just as the City of Oakland, EBPRD has an "approved" list of products, but also gives itself permission to use other products for years at a time by calling that use "experimental."

Information regarding herbicides required for the proposed project is not credible

The DEIS claims that only 5% of eucalypts and acacia will require retreatment to kill the roots of the trees and prevent resprouting in the future: *"...past experience by EBRPD indicates that only about 5% of cut stumps survive to need re-treatment (Rasmussen 2013)."* (DEIS 5.4-5) The reference cited for this statement is a personal communication from Mr. Rasmussen, who is identified as the Grants Manager of EBRPD. The DEIS provides us with no evidence to support this statement. For example, how many trees were observed, of what species, over what period of time?

The claim that only 5% of the trees will require herbicide retreatment is also not credible because it is contradicted by statements made previously by UCB and by other statements in the DEIS regarding retreatment.

- The City of Oakland's "Wildfire Prevention Program, 2008-2010" says, *"All cut tree stumps shall receive semi-annual follow-up treatment of herbicides on any emerging stump sprouts to ensure the permanent elimination of eucalyptus from the project area."* (DEIS 4.5-19)
- The DEIS also says, *"In addition, the city [of Oakland] provided a response to questions as a result of the preparation of this EIS."* That response was, *"All cut eucalyptus stumps shall receive annual follow-up treatment of herbicides (Garlon, Stalker) on any emerging stump sprouts..."* (DEIS 4.5-20)
- When UCB applied for FEMA grants for its proposed project in 2005, it submitted a letter in support of its application regarding its planned herbicide use to prevent resprouting of the trees it proposed to destroy. In that letter, the Associate Director of UCB's Physical Plant said semi-annual retreatment would be required for a period of 10 years to prevent resprouting: *"I would recommend that **two chemical treatments be made to both sites each year for 10 years**, with the objective of treating sprouts with herbicide."* (see Attachment B)

Analysis of the consequences of herbicides required for the proposed project is inadequate

Red-legged frog

For the record, I would like to observe that protections for endangered Red-legged frog described in the DEIS are meaningless, although they probably don't violate the law. I offer this empty gesture to make a record of the fact that legal protections for endangered animals are inadequate and often trumped by the perceived needs of native plants.

The active ingredients of the herbicides that will be used by the proposed projects (glyphosate, imazapyr, and triclopyr) are banned by a Federal District Court from use around certain habitats of the California red-legged frog. (DEIS 4.11-11) However, that same court order provided many exemptions to that ban, including "Individual tree removal using cut stump application." So, clearly most of the proposed project will be exempt from this ban, as most herbicide use will be for the purpose of destroying trees and preventing them from resprouting.

The DEIS also informs us, *"CRLF [California red legged frog] habitat may occur throughout the project area."* (DEIS 5.1-8) Therefore, the DEIS proposes "mitigation," including using Garlon 3A instead of Garlon 4 Ultra within 60 feet of water. Unfortunately, the active ingredient in both of these products is triclopyr, one of the banned herbicides in CRLF habitat. Therefore, we should not assume that CRLF will not be harmed by this project.

Use of flammable herbicide during fire season

The DEIS tells us that Garlon 3A will be used within 60 feet of water sources because it is slightly less toxic to aquatic life than Garlon 4 Ultra which is rated by the EPA as "highly toxic to aquatic organisms." The disadvantage of using Garlon 3A as a substitute for Garlon 4 Ultra is that the OSHA Hazard Communication Standard rates Garlon 3A as flammable. It is flammable because ethanol is one of its inert ingredients. Ethanol is "often used as motor fuel, mainly as a biofuel additive for gasoline," according to Wikipedia.

Garlon 3A will be used to treat the stumps of many of the trees that will be destroyed. UCB's policies governing its "fuels management" projects inform us:

- *"...herbicide would be hand-applied to eucalyptus species* ***during the dry season*** *(June 1 through October 31)."*[73]
- *"The herbicide treatment was provided by UC staff, which was pressed to treat 2 cut stumps per minute within 5 minutes after felling.* ***Placing applicators in close proximity to an operating feller-buncher*** *is somewhat hazardous and requires close coordination between applicator and equipment operator, typically through hand-signaling."*[74]

In other words, an herbicide rated as flammable will be used during the dry, fire season in close proximity to heavy, motorized equipment operating simultaneously. Yet, the DEIS tells us nothing about the potential risk of igniting a wildfire during a project that claims to reduce fire hazards.

Collateral damage to native trees and vegetation

The DEIS reports that native oak and bay trees exist under the canopy of the non-native trees and that those trees will flourish once the non-native trees are destroyed: *"The goal of this project is to reduce the amount of fuel on the site by allowing the eucalyptus, and pine-dominated non-native forest to convert to a native forest of California bay laurel, oak, and native grass and shrub species present beneath the non-native trees."* (DEIS ES-12) In other words, existing native species are in close proximity to the trees that will be destroyed, even under them.

The DEIS also tells us, *"Trees not targeted for application in the project areas may also be impacted by Stalker [imazapyr] if the herbicide reaches the surface soil and is taken up by the roots."* (DEIS App L-2) The ability for imazapyr to migrate from the roots of the target tree to non-target trees is well known. Its product label clearly states that it should not be used under the canopy of trees that the user is not attempting to kill. Furthermore, Garlon is also known to migrate from the roots of the target plant to the roots of other plants in proximity.[75]

The risk of collateral damage to non-target plants is acknowledged by the DEIS: *"...terrestrial plants may be adversely affected if the product [Stalker] is applied directly...or indirectly as the result of drift or leaching."* (DEIS AP L-13) Imazapyr is both mobile and persistent in the soil: *"According to the U.S. EPA, the active ingredient of Stalker, imazapyr,*

[73] University of California, Berkeley, "2020 Hill Area Fire Fuel Management Program," 2003
[74] Tom Klatt, "Fire Mitigation Program, Annual Report 2005," University of California, Berkeley
[75] Stott W. Howard, *Chemical Control of Woody Plants, Stumps, and Trees*, Washington State University, 1993

*is **persistent in soil** and can reach surface water via either runoff or leaching in groundwater that discharges to surface water, since it **is very mobile.**"* (DEIS APP L-2)

These are the herbicides that are most likely to be used to treat the cut stumps of the trees that are destroyed. Roundup is not effective to kill the roots of eucalyptus. Yet the DEIS tells us nothing about the likelihood of harming or even killing the native trees that the project is attempting to preserve.

Killing mycorrhizal fungi in the soil

Mycorrhizal fungi are microorganisms that exist in the soil that form a symbiotic relationship with many plants and trees, both native and non-native. They provide water and mineral nutrients in exchange for plant carbohydrates. *"Most forest trees and many other plants too, make use of mycorrhizae; some, like **oaks and pines, seem particularly reliant on them.**"*[76] And eucalypts are also dependent upon mycorrhizae: *"Many trees have mycorrhizae, but **pines and eucalypts seem particularly adept.**"*[77]

The active ingredient in Garlon 3A and Garlon 4 Ultra—triclopyr--is known to be toxic to microrganisms such as mycorrhizae:

> *"Garlon 4, at concentrations of 0.74 ppm in growth medium (agar) over 26–48 days, can inhibit growth in the mycorrhizal fungi Pisolithus tinctorius, and Hebeloma longicaudum.94 Soil concentrations of triclopyr are typically 4–18 ppm following application of 0.28-10 kg/ha.93 At realistic application rates, triclopyr could affect some fungal communities, but the data are sparse, and there is significant uncertainty about the potential effects of triclopyr on soil microorganisms. Mycorrhizal fungi are symbionts with plants that provide water and mineral nutrients in exchange for plant carbohydrates. Cenococcum geophilum, the slowest growing fungus, was least sensitive to the effects of triclopyr, exhibiting decreased growth at 742 ppm a.e. A similar study found that triclopyr (formulation not reported) could inhibit growth in five mycorrhizal species: Hebeloma crustuliniforme, Laccaria laccata, Thelophora americana, Thelophora terrestris, and Suillus tomentosus.94Fungi were kept in liquid culture for 30 days and the reduction of biomass with increasing triclopyr concentrations was measured. A 90% reduction in biomass was observed for all species at concentrations of 720 ppm; greater than 50% reduction biomass was observed in four of the five species at 36 ppm. The most sensitive species, Thelophora americana, exhibited a 6% decrease in growth rates relative to controls at triclopyr concentrations of 0.072 ppm (this result was statistically significant). In other species, statistically significant decreases in growth were reported between 0.72 ppm and 7.2 ppm."*[78]

To summarize, native trees are growing under and near the trees that will be destroyed. The predominant native tree, oak, requires mycorrhizal fungi to maintain its health and vigor. There are mycorrhizal fungi now in the soil of the eucalyptus forest. Those fungi are likely to be harmed by the herbicide that will be used to kill the roots of the eucalyptus forest. This sequence of events is likely to be detrimental to the health of the oaks, which are already under siege by the pathogen that is causing Sudden Oak Death. Yet, the sponsors of these projects tell us that oak-bay woodland will be the result of these projects. That seems very unlikely for many reasons and the loss of mycorrhizal fungi in the soil is one of them.

[76] Colin Tudge, *The Tree*, Three Rivers Press, 2005
[77] Ibid.
[78] Marin Municipal Water District, "Herbicide Risk Assessment," 2010

Damage to pollinators will hinder conversion to native landscape

The proposed project will have a devastating impact on honeybees and other pollinators. The Marin Municipal Water District Risk Assessment of herbicides reports, *"Triclopyr ranges from not acutely toxic to slightly acutely toxic to birds and honeybees."*[79]

Furthermore, honeybees, unlike native bees, do not hibernate in the winter. Therefore, the nectar that eucalyptus provides in the winter months is crucial to the survival of honeybees because it is a period during which no nectar is available from native vegetation. If honeybees turn to the early-blooming native buckeyes to compensate for the loss of nectar, they will be killed by that nectar which is toxic to them.[80]

Native bees will be unable to compensate for the loss of honeybees, because most of them nest in the ground. The native bees cannot penetrate the deep mulch that will be spread on the ground of the project areas.[81]

Hummingbirds are equally dependent upon the nectar provided by eucalypts during winter months. Ornithologists say there were no hummingbirds in the Bay Area during winter months prior to settlement and the introduction of plants that provide winter nectar.

The assumption that the native landscape will magically return to the devastated project area without being planted is not credible. The loss of pollinators is one of many reasons why this is unlikely to occur.

Conversion to native vegetation will be hindered by pesticide use

We have said before, and will repeat in the context of pesticide use, that the landscape resulting from the proposed project is likely to be dominated by non-native annual grasses, which is the most easily ignited herbaceous vegetation. Herbicide use will exacerbate that conversion:

> *"Depending on the application rate, **triclopyr may favor the development of grasses over broadleaf** weeds...At a rate of 1.12 kg/ha (1 lb/acre) total grasses increased by a factor of approximately 2 over control plots and total broadleaf cover decreased to approximately 60% of that noted in control plots."* (DEIS APP L-12)

Germination of the native landscape which sponsors of the proposed project predict will magically emerge without being planted, **will also be hindered by the use of herbicides** depending upon the concentration of the products that are applied:

> Garlon: *"The emergence of seedlings naturally occurring in the soil taken from an 8-year old mixed wood clearcut was monitored...substantial inhibition of Rubus species, other dicots, and monocots was observed...No seed germination was apparent..."* (DEIS APP L-13)
>
> Stalker: *"Terrestrial plant toxicity studies with monocots and dicots indicate that seedling emergence and vegetative vigor are severely impacted by exposure to imazapyr acid and to the IPA salt of imazapyr."* (DEIS APP L-13)

[79] Ibid.
[80] http://en.wikipedia.org/wiki/Bees_and_toxic_chemicals
[81] http://nature.berkeley.edu/urbanbeegardens/general_mulchmadness.html

To conclude this section of my public comment, I will quantify estimated herbicide volume required for the proposed project, using what little information is provided by the DEIS. The DEIS provides estimated tree removals for only the properties of UC Berkeley: Strawberry Canyon, Claremont Canyon, and Frowning Ridge. We are told that approximately 22,000 trees will be removed from Strawberry and Claremont Canyons and 32,000 from Frowning Ridge, for a total of 54,000 trees on 284 acres. We are not told how many of these trees are eucalypts and acacia, which will require herbicides to prevent resprouts. We are also told that 5% of the trees that require herbicide treatment will require retreatment, although this is not credible, given previous statements to the contrary. So, for the sake of argument, let's say that 5% of the trees are Monterey pines which will not require pesticide treatment, which will compensate for the claimed retreatment rate. The DEIS tells us that 1 – 2 ounces of pesticide will be required for each cut stump treatment. In that case, **the project areas on UC Berkeley properties will require between 422 and 844 gallons of herbicide.** If 844 gallons of pesticides are sprayed on the stumps of the trees that are destroyed, the maximum allowed per acre would be exceeded, as described earlier.

This estimate does not include any foliar spraying of non-native shrubs for which we are given no information. Nor does it include any of the herbicides that will be used by the City of Oakland and the East Bay Regional Park District.

Given what we know about the toxicity of pesticides and the collateral damage that is predicted to the vegetation that remains and the wildlife that occupy these spaces, **we are adamantly opposed to this project as described.**

Given that we do not anticipate any reduction in fire hazards, and that significant damage can be predicted from the use of pesticides, we repeat that **the "no project" alternative is the only viable alternative.** There is no potential benefit from this project. There is only environmental damage and increased fire risk.

Part IV: Other Environmental Issues and Unsupported assumptions about superiority of native plants

Other environmental issues

Erosion

The proposed projects of UC Berkeley are a continuation of its effort to eradicate all non-native trees from its property in the hills. In the past ten years, UC Berkeley has destroyed at least 18,000 trees on its property in the hills.[82] Observing those projects enables us to compare the reality of the consequences of those projects with the claims in the DEIS about UCB's ability to avoid unintended consequences such as erosion.

Here is a photo of the erosion resulting from the removal of trees by UCB about 10 years ago. This erosion is located on the west side of Grizzly Peak Blvd, south of Claremont Ave.

[82] Tom Klatt, "Fire Mitigation Program, Annual Report 2005," University of California, Berkeley

This erosion has been getting steadily worse for at least 5 years. Nothing more sophisticated than plastic and sand bags has been used to stabilize this hillside during that period of time.

The DEIS claims that UCB can prevent erosion from occurring when they remove trees from steep hillsides. These claims are not credible, based on our experience with identical projects which are complete. The mitigation proposed by the DEIS for erosion is inadequate. For example hydroseeding of native annual plants will not be capable to providing the same stability as deeply rooted, large trees. The final DEIS should either acknowledge the consequences of removing trees from steep hillsides or remove similar sites from the proposed project.

Windthrow

Unlike UCB and the City of Oakland, the East Bay Regional Park District plans to remove all trees in some locations and drastically thin trees in many locations. Where EBRPD intends to "thin" they will destroy approximately 90% of existing trees.

In EBRPD's response to public comments to its EIR for its "Wildfire Hazard Reduction and Resource Management Plan," EBRPD tells us that the density of existing eucalyptus forest on its properties varies from 400 to 900 trees per acre (page 392). This suggests that the average density of eucalyptus trees on EBPRD properties prior to the implementation of its plans was 650 trees per acre. EBRPD's proposed project will remove all trees from some areas and thin in others to create distances between eucalyptus trees of 25 and 35 feet. Such spacing would leave a maximum of 60 trees per acre, a reduction of over 90% of existing trees.

Such drastic thinning will make the few trees that remain vulnerable to windthrow. Windthrow is the complete failure of a tree which falls to the ground from its roots, particularly during periods of high wind.

Trees develop their defenses against the wind in a specific location in response to the wind conditions in that location. Their protection from the wind provided by neighboring trees is one of the factors that determine the wind hardness of each tree. The trees angle of repose, its root system, and the thickness of its bark are determined in part by the amount of wind it endures as it grows. Therefore, when it loses the protection from the wind provided by its neighbors, it is not adapted to increased wind. Although it can recover from that vulnerability after an indeterminate number of years, it is vulnerable to windthrow for a long period of time.[83]

The potential for catastrophic failure of the few trees that remain after EBRPD has destroyed 90% of the eucalyptus in its project areas has not been acknowledged or evaluated by the DEIS.

The final DEIS must acknowledge this risk factor and propose mitigation, such as eliminating locations that are subjected to a great deal of wind, e.g., west-facing, steep slopes. The prevailing wind in the East Bay is from the west and steep slopes accelerate the wind. Another method of mitigating potential windthrow is to sequence tree removals from the leeward side, with intervals of about 5 years, which enables the trees that remain to adapt to new wind conditions.[84] For the record, I will add that I oppose this drastic "thinning" on EBRPD's properties which is both unnecessary and detrimental to the environment. However, since EBRPD has satisfied CEQA requirements for its project, it is probably inevitable. Therefore, I take this opportunity to suggest that they implement their plans in the least harmful manner.

Nativist assumptions used to justify the proposed project are unsupported by scientific evidence

The DEIS attempts to justify the proposed projects by making negative judgments about non-native species and positive judgments about native species. The DEIS provides no scientific evidence to support these assumptions. There is considerable scientific evidence to refute these assumptions. **Unless the final EIS can provide scientific evidence to support these assumptions, they should be removed from the document.**

Assumption that all non-native species are "invasive"

The DEIS says repeatedly that the non-native plants and trees that will be eradicated by the proposed project are invasive. We will challenge that assumption only for the non-native trees which are the primary target of these projects: eucalyptus, Monterey pine, and acacia.

In fact, there is no evidence that any of these trees are "invasive." Although, the California Invasive Plant Council has classified eucalyptus as "moderately invasive," there is no scientific evidence to support this claim. According to the US Forest Service database of plants and trees, "It [Blue gum eucalyptus] does not spread far and rarely invades wildlands."[85]

[83] F. W. Telewski, "Wind induced physiological and development responses in trees," in *Wind and Trees,* edited by MP Coutts and J Grace, Cambridge University Press, 1995

[84] "Presidio of San Francisco, Wind Study, First Phase," Joe R. McBride, circa 2002. Unpublished. Available from Professor Joe R. McBride, UC Berkeley or the SF Presidio.

[85] http://www.fs.fed.us/database/feis/plants/tree/eucglo/all.html

William Russell (USGS) and Joe McBride (UC Berkeley)[86] used aerial photos of Bay Area parks taken over a 60 year period from 1939 to 1997, to study changes in vegetation types. (Note that this period of time ends before managers of public lands began to eradicate non-native trees around 2002.) They studied photos of 3 parks in the East Bay (Chabot, Tilden, Redwood), 2 parks in the North Bay (Pt Reyes, Bolinas Ridge), and one on the Peninsula (Skyline).

These photos revealed that grasslands are succeeding to shrubland, dominated by native coyote brush and manzanita. (They also noted that this conversion increases fire hazards.) **Eucalyptus and Monterey pine forests actually decreased during the period of study.** In those cases in which forests increased in size, they were native forests of oaks or Douglas fir. In other words, **they found no evidence that non-native trees are invading native trees or shrubs in the open spaces of the San Francisco Bay Area.**

The *Encyclopedia of Biological Invasions* was edited by Daniel Simberloff, who is a prolific proponent of invasion biology. According to the *Encyclopedia of Biological Invasions*, eucalypts are *"some of the most important solid timber and paper pulp forestry trees in the world."* There are about 40 million acres of eucalypts planted in tropical, sub-tropical, and temperate countries. The predominant species of eucalyptus in the Bay Area, Blue Gum (*E. globulus),* is grown in 13 countries in addition to the US and Australia. About 70 species of eucalypts are naturalized outside their native ranges. *"However, given the extent of cultivation,* ***eucalypts are markedly less invasive than many other widely cultivated trees and shrubs...they have been orders of magnitude less successful as invaders than pines and several other widely planted trees...Where eucalypts have invaded, they have very seldom spread considerable distances from planting sites, and their regeneration is frequently sporadic*** *"*[87]

The *Encyclopedia* says that **eucalyptus seedlings die quickly** if they don't establish roots in moist soil quickly. If the soil is too moist they are susceptible to destruction by fungus. If there is too much leaf litter or there is an understory, they are unlikely to find the quick access to the soil they need to survive. There is a narrow range of conditions needed to successfully establish eucalyptus seedlings.

The seeds of eucalypts have no natural means of dispersal, such as fleshy tissue which can function as wings on the wind. Tests have shown that the seeds *"are dispersed over quite short distances."*[88] *"Seed dispersal is mainly by wind or gravity and is virtually limited to twice the tree height."*[89]

The California Invasive Plant Council classifies *Acacia dealbata* (Silver wattle) as "moderately invasive" and the impact of *Acacia melanoxylon* (Black acacia) as "limited" and adds, "impacts are low in most areas." In fact, acacia does not spread unless it is cut down when it then resprouts vigorously from the roots unless it is poisoned repeatedly or the roots are dug out of the ground with heavy equipment. The misguided attempt to eradicate acacia is more likely to result in more acacia rather than less.

Neither Monterey cypress nor Monterey pine are invasive. Even the California Invasive Plant Council agrees with that assessment. And both are California natives with fossil evidence that they existed on the San Francisco peninsula in the

[86] William H. Russell, Joe R. McBride, "Landscape scale vegetation-type conversion and fire hazard in the San Francisco bay area open spaces," Landscape and Urban Planning, Volume 64, Issue 4, August 15, 2003, pages 201-208.
[87] Marcel Rejmanek and David Richardson, "Eucalypts," in Encyclopedia of Biological Invasions, eds, Daniel Simberloff and Marcel Rejmanek, University of California Berkeley Press, 2011
[88] Ibid.
[89] Craig Hardner, et. al., "The Relationship between Cross Success and Spatial Proximity of Eucalypts Globulus ssp. Globulus Parents," in Evolution, 212, 1998, 614-618.

distant past. The eradication of these California natives is an example of the extremist agenda of native plant advocates **who insist on recreating a landscape that is specific to both a location and a period of time.**

Assumption that there are no insects in non-native vegetation

The DEIS claims that non-native plants produce more leaf litter than native plants:

> *"In part, non-native species produce greater fuel loads than the native vegetation they displace because of the absence of organisms (insects, soil microbes, and other plant species) from their native landscape that evolved with them and moderated their proliferation."* (DEIS 4.3-7)

This is the conventional wisdom amongst native plant advocates. However, they cannot provide scientific evidence to support their claim that insects do not eat non-native plants. There is considerable evidence to the contrary.

The scientist who is most often quoted to support beliefs of native plant advocates is Doug Tallamy who wrote an influential book, *Bringing Nature Home: How Native Plants Sustain Wildlife in our Gardens.* [90] Professor Tallamy is an entomologist at the University of Delaware.

Professor Tallamy's hypothesis in that book was that native insects require native plants because they have evolved together "over thousands of generations." Because insects are an essential ingredient in the food web, he speculates that the absence of native plants would ultimately result in "ecological collapse" as other animals in the food web are starved by the loss of insects.

Professor Tallamy freely admits in that book that his theory was based on his own anecdotal observations in his garden, not on scientific evidence: *"How do we know the actual extent to which our native insect generalists are eating alien plants? We don't until we go into the field and see exactly what is eating what. Unfortunately, this important but simple task has been all but ignored so far."*

This research has now been done to Professor Tallamy's satisfaction by a Master's Degree student under his direction. **The report of that study does not substantiate Professor Tallamy's belief that insects eat only native plants. In his own words, Professor Tallamy now tells us:**

> *"Erin [Reed] compared the amount of damage sucking and chewing insects made on the ornamental plants at six suburban properties landscaped primarily with species native to the area and six properties landscaped traditionally. After two years of measurements Erin found that only a tiny percentage of leaves were damaged on either set of properties at the end of the season....Erin's most important result, however, was that* ***there was no statistical difference in the amount of damage on either landscape type."*** [91]

A local study also found that non-native plants and trees—including eucalyptus—support as many insects as native plants and trees. Professor Dov Sax (Brown University) compared insects living in the leaf litter of the non-native eucalyptus forest with those living in the native oak-bay woodland in Berkeley, California.[92] He found **significantly more species of insects in the leaf litter of the eucalyptus forest in the spring and equal numbers in the fall**. Professor Sax

[90] Tallamy, Doug, Bringing Nature Home, Timber Press, 2007

[91] Tallamy, Doug, "Flipping the Paradigm: Landscapes that Welcome Wildlife," chapter in Christopher, Thomas, The New American Landscape, Timber Press, 2011

[92] Dov Sax, "Equal diversity in disparate species assemblages: a comparison of native and exotic woodlands in California," Global Ecology and Biogeography, 11, 49-52, 2002

also reports the results of many similar studies (comparing eucalyptus with native forests) conducted all over the world that reach the same conclusion.

Neil Sugihara tells us in *Fire in California's Ecosystems, "Dead biomass accumulates in Mediterranean ecosystems because weather conditions are favorable for growth while decomposition is active for a relatively short part of the year. Fire complements decomposition in these systems by periodically removing debris through combustion."*[93] In other words, conditions for accumulated leaf litter in California's ecosystems are not unique to non-native species. Rather they are a function of California's climate. Native and non-native vegetation are equally likely to accumulate leaf litter in California's Mediterranean climate. Native vegetation in California promotes fire, just as non-native vegetation does. Destroying non-native vegetation to promote native vegetation will not reduce fire hazard.

Assumption that wildlife benefits from native plants

The DEIS acknowledges that wildlife is likely to be harmed in the short run by the implementation of the proposed project, such as pesticide use. However, the DEIS claims that short-term harm will be mitigated by the long-term benefit of native habitat to wildlife:

> *"Although extensive mitigation measures would be implemented to protect wildlife during implementation of the proposed and connected actions, some wildlife would inevitably be harmed, including protected species. In the long term, conditions would improve for native wildlife that benefits from native habitat."* (DEIS 5.17-1)

There are two flaws in this assumption:

1. We cannot assume that a native landscape will be the result of this project because nothing is going to be planted and the natural succession landscape is much more likely to be non-native, as we have explained earlier in our comment.
2. Even if a native landscape is capable of surviving the devastation of the proposed project and out-competing the existing non-native vegetation, there is no evidence that wildlife is dependent upon or benefits from native habitat.
    - We cited earlier a study by Dov Sax of diversity of insect species found in eucalyptus forest compared to diversity in oak woodland in Berkeley, California. In addition to quantifying species of insects, Professor Sax also found equal numbers of species of amphibians and birds in both types of forest.
    - In 1975, Professor Robert Stebbins (Emeritus, UC Berkeley) was hired by East Bay Regional Park District to conduct a survey of vertebrate animals living in several parks (Sibley, Chabot, and Tilden). The forest types that Professor Stebbins studied were redwood, Monterey pine, eucalyptus, and oak-bay woodland. Here is how he described his findings:
        - *"Redwood and Monterey pine habitats are notably depauperate in vertebrate species.*
        - ***"Eucalyptus habitat is far richer in vertebrates than either redwood or Monterey pine and vies with 'dry' chaparral and grassland in species diversity and 'attractiveness.'***
        - *"Oak-bay woodland is the richest in both species and 'attractiveness.'*
        - *"Grassland is a little less rich in species and 'attractiveness' than the other native habitats, but only slightly richer than eucalyptus habitat."*[94]

[93] Neil Sugihara and Michael Barbour, "Fire and California Vegetation," in *Fire in California's Ecosystems,* University of California Press, 2006

[94] Robert Stebbins, "Use of Habitats in the East Bay Regional Park by Free-living Vertebrate Animals," August 1975. In "Vegetation Management Principles and Policies for the East Bay Regional Park District," June 1976

The DEIS acknowledges that wildlife will be harmed by the proposed project in the short-term and it provides no evidence that wildlife will benefit from the proposed project in the long-term. Therefore, the final EIS cannot claim that wildlife will benefit from the proposed project. The final EIS must either provide scientific evidence of long-term benefit of the proposed project to wildlife, or it must acknowledge that wildlife will be harmed by the proposed project both in the short-term and in the long-term.

In conclusion, the DEIS relies on unsubstantiated assumptions about the superiority of native plants and the inferiority of non-native plants to justify the proposed project. It also does not acknowledge the potential for windthrow that is the likely result of "thinning" 90% of the forest on the property of the East Bay Regional Park District. Finally, its analysis of the potential for erosion is inadequate and does not acknowledge the existing erosion resulting from identical projects on the property of UC Berkeley. These flaws must be corrected by the final EIS or the proposed project altered to mitigate for the environmental damage resulting from these projects.

Part V: "No Project" is the only viable alternative

The "No Project" alternative is the only viable alternative because it will deny FEMA funding for projects that will increase fire hazards in the East Bay by

- Distributing tons of dead wood on the ground
- Conducting prescribed burns that increase risks of wildfire
- Promoting a landscape that will be more flammable than the existing landscape
- Eliminating fog drip and shade that keep the ground moist and reduce risks of ignition
- Eliminating the windbreak that can stop a wind driven fire

FEMA funding should not be used to increase risks of catastrophic wildfire. The reduction of hazards such as wildfire should be FEMA's only criterion for grant funding.

The "No Project" alternative does not prevent the sponsors of the proposed projects from performing fire hazard management on the public lands for which they are responsible. They can, for example, continue to mow herbaceous vegetation from the roads that border their properties in order to reduce risks of ignition responsible for most fires in California. In the event of another deep, sustained freeze that is capable of causing exotic vegetation to die back, they can remove the dead leaf litter that has contributed to wildfires in the East Bay in the past. Given that these deep freezes are rare and less likely to occur in our warming climate, this responsibility is not an onerous task.

The proposed projects would violate California law regarding the reduction of greenhouse gases. If the projects of UC Berkeley and the City of Oakland proceed as planned, they will surely be subjected to legal challenge on those grounds.

The proposed projects will damage the environment in significant ways that can be avoided by adopting the "No Project" alternative without increasing fire hazard risks.

- This project will release thousands of tons of greenhouse gases into the atmosphere, contributing to climate change.
- This project as defined by the DEIS will require huge amounts of herbicide to implement.
- This project will cause erosion, as similar projects have in the past.

- The drastic "thinning" of most non-native trees by the East Bay Regional Park District will result in the failure of the few remaining trees that are not adapted to wind to which they will be exposed.

There is no potential benefit to the proposed project, as presently defined. It presumes that conversion to a native landscape will be the benefit. Even if we accept the assumption that a native landscape is somehow superior to the existing landscape—and we do not—this is an unlikely outcome since there are no plans to plant anything after all non-native vegetation is destroyed. Nor do we accept the assumption that a native landscape is less flammable than the existing landscape.

Respectfully submitted,
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URS

27 May 2009

Mr. Alessandro Amaglio
Environmental Officer
FEMA Region IX
1111 Broadway Street, Suite 1200
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Re: Strawberry Canyon Vegetation Mitigation, Regents of the University of California, PDMC-PJ-09-CA-2005-011, Task Order HSFEHQ-06-J-0048, Contract HSFEHQ-06-D-0162

Dear Mr. ~~Amaglio:~~ Sandro

At your request, we have reviewed the responses provided by the University of California at Berkeley (UC) in a letter from Mr. Stephen Stoll and Ms. Jyl Baldwin dated 25 March 2009 and addressed to Mr. Ken Worman of the California Emergency Management Agency (CalEMA). The UC provided these responses to a request from Ms. Sally Ziolkowski of the Federal Emergency Management Agency (FEMA) to CalEMA dated 17 February 2009. This letter contains our comments regarding the sufficiency and accuracy of the UC's responses to assist FEMA determine appropriate steps in the Environmental and Historic Preservation review process. Issue numbers correspond to the numbers used in the FEMA and UC letters referenced above.

Issue 1. Evidence that the supposed habitat restoration benefit will occur, since no plan for revegetation is included in the grant.

The UC responds accurately that, post-treatment, the project area will provide better growing conditions for plants in the understory because the plants will have increased access to resources (e.g., sunlight and soil nutrients) that will allow them to grow faster. In the absence of eucalyptus trees, which drop large quantities of leaf and branch litter containing toxic oils, it is likely that a new community of plants would rapidly colonize the site. However, we question the assumption that the types of vegetation recolonizing the area would be native. Based on conditions observed during site visits in April 2009, current understory species such as English ivy, acacia, *vinca* sp., French broom, and Himalayan blackberry would likely be the first to recover and recolonize newly disturbed areas once the eucalyptus removal is complete. These understory species are aggressive exotics, and in the absence of proactive removal there is no evidence to suggest that they would cease to thrive in the area, especially the French broom which would be the only understory plant capable of surviving inundation by a 2-foot-deep layer of eucalyptus chips.

In its letter, the UC provides photographs of pre- and post-treatment conditions from similar fuel removal projects in the East Bay Hills to document its assertion that native vegetation would naturally re-establish in treated areas. However, the photographs do not show young

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native vegetation in the treated areas; instead they document (1) areas on the edge of treatment sites that are vegetated in native coyote brush both before and after treatment, (2) areas where mature coyote brush have survived a treatment, and (3) pre- and post-treatment conditions of a project that appears to be successful but lack dates or a description of how much time elapsed between the photographs. The photographs do provide evidence to support coyote brush survival at the edges of treatment sites. Coyote brush would be expected to survive treatment and inundation in chipped eucalyptus due to its shrubby, robust, woody form. However, the proposed treatment area does not contain an understory of coyote brush, nor would it be expected to as the species thrives on open dry sites, not under a closed eucalyptus canopy. The species is found in small openings of eucalyptus canopy within the proposed treatment area but these openings represent a small proportion of the entire treatment area.

As written, the current plan assumes native vegetation will reclaim the treatment areas but does not include any plans for native revegetation. Instead, in order to "reduce undesirable weed invasions" and thus encourage the development of native grasslands, chaparral, and bay/redwood communities, UC plans to apply chip mulch to the ground. This mulch would be derived from the cut, non-native eucalyptus trees. It is not clear how the mulch would prevent the proliferation of invasive species while simultaneously encouraging the growth of existing native species. Despite thorough research, we were unable to find documentation of the ability of exotic chip mulch to suppress undesirable species while encouraging favorable species. Chip mulch can be a successful deterrent to invasive plants, but would have to be coupled with selective native plantings if the intended long-term outcome was revegetation in native cover. In the absence of native plantings/seeding, it is likely that as the chips decompose (refer to Issue 6, below, for a discussion of decomposition rates) dormant seeds in the seed bed from the exotics that dominated the site pre-treatment will germinate and regain dominance. As written, the proposed project would likely delay but not prevent the re-establishment of non-native vegetation communities. Native cover could develop in small areas around existing, patchy, coyote bushes, but it is highly unlikely that the site would naturally restore itself to native conditions given the aggressive nature of the weedy exotic species that are already established in the treatment areas and dominate the seed bed. Additionally, in the 3 to 5 years that the UC claims the chips will decompose, it is anticipated that the proportion of aggressive non-native vegetation surrounding the treatment areas will have increased compared to native vegetation, unless a proactive eradication effort is implemented. Thus, the likelihood that seeding from surrounding vegetation will be aggressive exotic species will also have increased, thereby decreasing the likelihood of native species colonizing the treatment area. In the absence of a revegetation plan in the treatment area targeting native species plantings during the chip decomposition period, the risk of non-natives colonizing the site once the chips have decomposed would have increased. Although in its letter the UC claims that it is "a regional standard to not re-vegetate as part of fuel management projects" because native species in the understory are responsive to improved growing conditions, it is also not a regional standard to recover the treated area in 2 feet of chips derived from an exotic fuel source.

Issue 2. Relative fire risk of current vegetation versus chip dominated landscape: there is no scientific evidence to support the project as proposed.

The UC accurately claims that standing eucalyptus is a greater fire hazard, all things considered, than chipped eucalyptus. We concur that eucalyptus forests pose a high fire risk to surrounding communities due to high fuel loads in the canopy and on the ground. It is well documented that the unique arrangement of fuels, content of oils and other volatile chemicals in the foliage, size and shape of the fuels, location of fuels, and height of ember production all contribute to this risk and can be mitigated through removal and of eucalyptus trees. However, the comparative risk between eucalyptus in the form of a dense standing forest versus the form of a 2-foot-deep mulch layer on the ground is not well documented. Studies have shown that mulch layers actually can pose a fire risk depending upon the type of material, the depth of the mulch, and the climate at the mulch site. Studies at the Ohio State University Agricultural Technical Institute demonstrated that sparks from cigarettes or matches can lead to a subsurface smoldering fire in a variety of mulch materials 4 inches deep (Steward 2002). The recommended depth for landscape mulch is less than 4 inches (Appleton and French 1995) to avoid stifling growth of remaining trees and to avoid spontaneous combustion that can occur when decomposition of organic materials creates enough energy in a pile to ignite a fire. Fire Engineering Magazine (2008) reported that spontaneous combustion resulting in a catastrophic fire occurred in 10- to 20-foot piles. Although eucalyptus chips were not tested in these studies, Fire Engineering Magazine recommends that, to reduce the potential for fire in mulch, one should recognize that mulches high in oils ignite more easily and that mulch fires start more readily in hot climates where rain is scarce (and fuel moisture is low). Eucalyptus material is high in oils, and the East Bay Hills are subject to long annual periods that are hot and dry. The UC cites a study by Duryea et al. (1999) where a high moisture level in mulch is assumed to assist the observed rapid decomposition rate in mulches; however, this study occurred in inland Florida where the climate is hot and humid and the study looked at a mulch layer that was less than 4 inches deep. It is likely that moisture retention would be significantly less in a thicker layer of mulch within a more moderate and arid climate such as the East Bay Hills.

In its letter, the UC proposes leaving up to 2 feet of chipped eucalyptus spread across treatment areas as both a weed barrier and as a fire prevention measure. However, the UC's claim that "since a canopy is absent during the time when the landscape is covered in chips, the concern over embers being generated from this location is almost eliminated" is contradicted by the proposed treatment plan, which explicitly leaves native canopy cover in treatment areas (i.e., California bay and coast live oak trees). Although the fire risk of bay and coast live oak is lower than eucalyptus, the misleading statement about an absent canopy undermines the argument that the risk of embers is eliminated.

Issue 3. Potential for introduction of chaparral-dominated landscape and issues associated with fuel-driven fires versus climate-driven fires.

As claimed by the UC, the removal of eucalyptus trees in the treatment area would reduce the risk of catastrophic fires driven (but not necessarily initiated) by climate conditions, such as

during periods with Diablo winds. One relevant metric for determining the level of risk a particular vegetation type poses as a wildland fuel in a wind-driven fire event is "spotting distance" (the distance an ember will carry beyond its source). As status by the UC, eucalyptus can spot up to 9 miles, which far exceeds the cited distances for other vegetation communities with potential to occupy the project area. Although chaparral is a high-risk vegetation type in fire-prone landscapes, its spotting distance is only 100 to 200 feet, and fires in this vegetation type are assumed to be driven by fuels.

The behavior of fuel-driven fires, understood as fires whose behavior is determined primarily by the type of fuels found on the landscape, could vary greatly on the post-treatment landscape depending upon the vegetation communities that develop. In the absence of a revegetation plan for the site, all possible future vegetation types in the treatment area must be analyzed; these vegetation types include native and non-native grasslands, chaparral, non-native shrub/scrub communities, and oak-bay forests. Fire conditions in each of these landscapes are unique, for instance grasslands fuels burn cooler and faster than eucalyptus material, yet they are easier to ignite and carry fire quickly across a landscape. Chaparral is one of the most hazardous wildland fuel types in California due to the woody, persistent nature of the plants. A chaparral-dominated landscape in the post-treatment project area would create a fire hazard profile with its own suite of risks and concerns for fire protection, including flame lengths that far exceed those of the other possible vegetation types (Carle 2008). Although spotting distance is not as great for the fuels that make up chaparral communities when compared to a eucalyptus forest, chaparral fires burn with great intensity and are difficult to fight based upon the spatial arrangement of fuels on the landscape. Coast live oak forests are one of the most fire-resistant, tree-dominated fuel types due to characteristic thick bark and small persistent leaves (Sugihara et al. eds. 2006). To address the relative risk of fuel-driven fires in the various landscapes that could develop post-treatment, UC provides an incomplete list of different vegetation-based "fuel model" scenarios in Appendix A, which was attached to the UC's letter.

The proposed project assumes that regardless of the type and kind of vegetation community that forms in the newly cleared areas, the eucalyptus chip layer will retain adequate moisture to remove it as a concern in the fuel profile. As explained in the response to Issue 2, it may be inaccurate to assume that the chip layer, given its depth, can be ignored as a potential fuel source. However, such a deep chip layer may have the potential to not only sustain a localized burn but to connect fuels in vegetation types located adjacent to the treatment areas.

Issue 4. Justification of two species (Monterey pine and acacia) targeted for removal are a risk.

The UC accurately asserts that Monterey pine and acacia are regionally exotic species and, due to their success in the East Bay Hills, could undermine the establishment of native vegetation types in the post-treatment landscape by competing with oak and bay for dominance in the forest canopy. The UC inaccurately characterizes the fire hazard risk posed by the two species however. Monterey pine and acacia trees in the treatment areas occupy primarily the middle layers of the forest canopy. In limited areas individual Monterey pine

trees approach the eucalyptus canopy in height but this is not the case throughout the project area. Both the Monterey pine and acacia trees more likely serve as ladder fuels: during a forest fire they provide fuel continuity between flammable material on the ground and the lower branches of the dominant tree canopy in the overstory. However, they only serve this function in the presence of a taller overstory species such as blue gum eucalyptus. When found in forests in the absence of eucalyptus, Monterey pine trees are considered to be a fire hazard due to the accumulation of needles and branches below individual trees, but this would not pose a threat if the accumulated material was covered by 2 feet of eucalyptus chips. In the treatment area Monterey pine is found primarily in small patches of fewer than 5 trees, a spatial distribution that constitutes a low fire risk on the landscape. Acacia in the treatment area is concentrated around structures. These trees tend to accumulate quantities of seed pods and branches, but they would only be considered a risk based on their proximity to existing structures, not because of their vegetative contribution (i.e., fuel load) alone. Monterey pine and acacia trees in the treatment area only pose a substantial fire danger when growing within an eucalyptus forest. In the absence of the eucalyptus overstory, they do not pose a substantial fire hazard.

Issue 5. Complete analysis of other practical alternatives—(a) regularly clearing ground litter, (b) thinning targeted species rather than removing all and regularly clearing the understory, and (c) creating strategic fuelbreaks.

The UC states that alternatives to the proposed project should be analyzed for feasibility, effectiveness, and compliance with the Endangered Species Act. Feasibility is then described by the UC to include erosion, worker safety, costs, and endangered species. According to NEPA's implementing regulations, FEMA must "rigorously explore and objectively evaluate all reasonable alternatives" (40 CFR Parts 1500 et seq.). FEMA would not, however, be required to evaluate alternatives that would not satisfy the goals of the proposed project or alternatives that are "infeasible, ineffective, or inconsistent" with basic policy objective (Headwaters, Inc. v. Bureau of Land Management, 914 F.2d 1174, 20 Envtl. L. Rep. 21,378). Thus, feasibility (including cost) and effectiveness to meet the purpose and need can be valid reasons to screen alternatives from further consideration. However, potential environmental impacts such as increased erosion and take of endangered species should not be used to omit alternatives from further analysis. Therefore, the UC's justifications for eliminating alternatives because they are environmentally more harmful than the proposed project are not discussed in further detail. Following is an analysis of UC's claims that the alternatives suggested would be infeasible or would not meet the purpose and need of the project.

(a) Regularly clearing ground litter. The UC makes a valid argument that this alternative would not meet the purpose and need. Removing ground litter would not address eucalyptus' primary fire-hazard characteristics (e.g., fuel density in canopies, spotting distance, aerial fuel loads) and the presence of shrubby surface fuels that could carry fires independent of cleared ground litter. Thus, the fire risk would essentially be the same pre- and post-treatment. Cost associated with annual work crews and disposal of material could also be prohibitive compared to the proposed project. Elimination of this alternative from further consideration is acceptable.

(b) Thinning targeted species rather than removing all and regularly clearing the understory. The UC accurately cites increased costs and a longer time period to implement as reasons that this alternative is not preferred, but the UC does not provide information that demonstrates that the increased costs or longer implementation period make this alternative infeasible. This alternative would not be as effective as the proposed project at reducing the fire hazard. However, this alternative would reduce the fire hazard and would thus meet the purpose and need. This alternative should be evaluated in future NEPA documents.

(c) Creating strategic fuelbreaks. The UC makes a valid argument that this alternative would not meet the purpose and need as the fire risk would essentially be the same pre- and post-treatment. Because of the height of the eucalyptus trees, the distance and topography between the project site and the ridgetop, and the fuel behavior in eucalyptus stands, a linear fuelbreak would not provide fire containment or fire control. Thus, the fire risk would essentially be the same pre- and post-treatment. Elimination of this alternative from further consideration is acceptable.

Issue 6. Document chips will decompose in 3 to 5 years.

The UC cites two published studies on eucalyptus chip decomposition to support its claim that the anticipated 2 feet of eucalyptus chips from the proposed project will decompose in 3 to 5 years. Many factors (e.g., soil type, climate, chip size, chip depth, species of eucalyptus) likely contribute to decomposition rates of eucalyptus chips. A study by Grove et al. (2008) confirms a strong correlation between eucalyptus mass and decomposition rates. The highest decomposition rate of eucalyptus was shown, in a controlled experiment, to be 78 percent in the first year and 68 percent in the second year (Faber and Spiers 2004). Chip size was not provided in this study, though the eucalyptus mulch was referred to being "shredded/chipped" with a significant portion of the mulch consisting of leaf matter. Further, the starting depth of the shredded/chipped eucalyptus in this experiment was just under 4 inches (i.e., 100 millimeters, not 100 centimeters as claimed in the UC summary of this study). Another study, based upon experimental conditions, demonstrated a 21-percent decomposition rate of eucalyptus mulch over 1 year (Duryea et al. 1999). Similar to the Faber and Spiers (2004) study, the starting depth of the chip mulch in the Duryea et at. (1999) study was 3.5 inches. A thorough literature search did not identify any studies documenting decomposition rates in eucalyptus mulch deeper than 4 inches, which notably is the maximum recommended depth for landscaping (Steward 2002).

In lieu of more relevant data, we generated a simple model using an average of the decomposition rates of the two studies, modified for negative exponential decay, as shown by Faber and Spiers (2004), Goya et al. (2008), and Grove et al. (2008). This model predicts that 24 inches of eucalyptus mulch would take 10 years to decompose to a depth of less than 1 inch. For reasons described above, the model is rough and should only be used in comparison with the time for eucalyptus mulch to decompose to depths of less than 1 inch calculated by extrapolating the decomposition rates provided by the two eucalyptus mulch studies from starting depths of less than 4 inches to the proposed 24 inches: 3 years (per Faber and Spiers

URS

2004 data) and 14 years (per Duryea et al. 1999 data). Best scientific judgment suggests that a deeper chip layer would decompose more slowly than a shallow chip layer because it would be more insulated from moisture and less of its surface area would be in contact with decomposing bacteria and fungi found in the soil. Finally, the photographic documentation from similar treatment areas in the East Bay Hills, provided by UC to support its decomposition rate claim, does not appear to document a consistent viewpoint. In summary, the UC does not provide convincing evidence that the mulch at the depth proposed would decompose in 3 to 5 years.

The issue of chip decomposition also affects the evaluation of the UC's response to Issue 1 because the UC's argument for native revegetation is based upon its assumptions of the decay rate and behavior of the eucalyptus chips. By the time the chips fully decompose, the treatment area will likely be vegetated only sparsely with the shrubs and trees that remained post-treatment. After full decomposition, the exposed soil layer would be an ideal germination site for (1) seeds that have remained dormant in the seed bed and (2) seeds from plants in adjacent areas. Alexander and D'Antonio (2003) report that exotic invasive leguminous shrubs like French broom (which is present in and adjacent to the proposed treatment area) build up a larder seed bank in their introduced ranges compared with their native ones and in grassland systems they build a larger seed bed than native grasses. Seeds of successful, exotic species are opportunistic; given the abundance of established non-native species in the proposed treatment areas as well as adjacent to them, the post-decomposition exposed understory in the treatment areas could be quickly colonized by a non-native mix of Mediterranean grasses, Italian thistle, English ivy, various broom species, and *vinca* sp.

If you have any questions about these comments or this assignment, please contact either of us at 510.893.3600. URS appreciates the opportunity to support you on this task order.

Sincerely,

URS Corporation

Galen Peracca
Forest Ecologist

G. Morgan Griffin
Senior Project Manager

References

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RECEIVED
JUN 17 2013
BY:

TO: FEMA EBH-EIS-FEMA-RIX@fema.dhs.gov,

FAX: (510) 627-7147

FROM: Catherine Orozco

RE: DRAFT EIS EBH

East Bay Residents are delighted that FEMA is considering proposals to reduce fire risk in our area. Unfortunately, proposals in the Draft EIS are completely unacceptable. The stated purpose of the project is to substantially reduce hazardous fire risk to people and structures in the East Bay Hills and the vicinity of Miller/Knox Regional Shoreline. If the only objective were to reduce fire risk, one could remove all trees and plants and cover the ground with concrete. Of course, that is ridiculous because there are other concerns--biological resources; soils; water resources; air quality; climate and micro-climate; aesthetics, visual quality and recreation; and human and environmental health, and the current proposal fails to adequately address these concerns.

The UC application proposes to cut down 54,000 non-native trees in Strawberry Canyon, Claremont Canyon and Frowning Ridge. While the stated goal is to allow the forest to convert from a eucalyptus-dominated, non-native forest to a native forest of California bay laurel, oak, big-leaf maple, California buckeye, California hazelnut, and other native tree and shrub species, there is no plan for planting native trees, and it is likely that highly flammable invasive species such as scotch broom would take over. While UC states that native species provide less fuel to potential wildfires than the non-native species, the native bay trees provide as much fuel as the eucalyptus. I suggest a preferable plan is to thin dense areas, remove lower limbs from remaining trees and clean up all woody debris on the ground.

UC's proposal to leave two feet deep of wood chips creates an extreme fire danger--EBRPD's plan to leave 4 inches of chips is much safer. Furthermore, there is no evidence that the chips would decompose in 5 years in the East Bay climate.

I am troubled by the effects of the project and do not believe the mitigations are adequate. There will be increased potential for soil erosion and landslides. The best management practices do no eliminate these dangers.

1. Soil. The soil will be damaged by decomposing wood chips. There will be sedimentation of streams and water bodies during and after implementation, regardless of the mitigation. Herbicides will reach streams and water bodies in storm water runoff, even if minimized by best management practices and use restrictions near water.

2. Air pollution. There will be air pollution during pile burning and broadcast burning of cut vegetation, including carbon monoxide emissions exceeding the California Air Resources Board de minimis threshold for general conformity. The FEMA Draft vegetation management project does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis uses an inappropriate baseline and fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects.
3. Climate and Microclimate–carbon dioxide will be created during pile burning of cut vegetation and broadcast burning in a few project areas.
4. Aesthetics, Visual Quality and Recreation. I love the tall graceful eucalyptus. Humans enjoy walking and hiking in the forests. The dry wood chip covered hills and land will be nothing less than ugly. Please consider the environment—with no plans for planting—what will we have?
5. Health There is great potential adverse health effects of herbicides on vegetation management workers, nearby residents, and users of parks and open space, even given the mitigated restrictions and management practices. The FEMA Draft EIS does not adequately address the cost or the risks associated with the herbicide use that is being proposed. It must consider all the implications of the expected herbicide use to kill trees and the resulting hemlock, broom, thistle, and poison oak that will emerge after the loss of shade canopy.

In light of the negative effects the current proposal would have on biological resources, fire and fuels, climate, aesthetics and visual quality, and recreation, I urge FEMA to require modifications of the proposed actions as a condition of funding the applications.

I believe the EIS should require a far less destructive methodology that focuses on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing more than 50,000 trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen.

I also believe the FEMA Draft EIS vegetation management project is unacceptable because it does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet. This flame length is worse than what could be expected with the trees that exist currently. I urge you to retract the EIS and rework it to develop a proposal that actually fixes the problem.

The FEMA Draft EIS vegetation management project is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

The FEMA Draft EIS is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after some 100,000 trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. The Draft does not compare the current risk to the risk that would exist 2-5 years from now if the trees were cut down and the earth was covered with 2 feet of eucalyptus chips and scotch broom, thistles and other high fire ground growth.

I submit there are better solutions for fire prevention than clear-cutting acres of UC land and covering it with w feet of wood chips and herbicides. I urge you to require revision of the plan. In light of the negative effects the current proposal would have on biological resources , fire and fuels, climate, aesthetics and visual quality, and recreation, I urge FEMA to require modifications of the proposed actions as a condition of funding the applications.

Respectfully,

Catherine Orozco

208 Panoramic Way

Berkeley, CA 94704

Duplicate
Submitted by
email
6/12/2013

DIABLO FIRESAFE COUNCIL
www.diablofiresafe.org

RECEIVED
JUN 17 2013
BY:

June 12, 2013

FEMA Region IX East Bay Hills EIS
PO Box 72379
Oakland, CA 94612-8579
By email: EBH-EIS-FEMA-RIX@fema.dhs.gov

Dear FEMA Region IX Administrators:

The Diablo Fire Safe Council (DFSC) wishes to support the East Bay Hills EIS and funding of the proposed projects. It is critical that the projects funded with the FEMA grants move forward. Public agencies need to be able to do their part to make our communities safer.

DFSC is a non-profit group dedicated to making Alameda and Contra County more firesafe from wildfires. We work with fire departments and agencies to raise awareness of the risk of wildfire in our region. We provide training and incentives to homeowners to maintain defensible space around their homes to reduce the risk from wildfire. We partner with public agencies to help fund and carryout projects on parklands, watershed and other open spaces.

We support the decision to move forward with the projects addressed in the East Bay Hills EIS. We look forward to the completion of the environmental review process and implementation of these critical hazardous fire risk reduction projects.

Sincerely

Dee McDonough

Dee McDonough
President

P.O. Box 18616 Oakland CA, 94619
(510) 536-0143 email: DFSCMiller@comcast.net

RECEIVED
JUN 17 2013
BY:

Todd Stanton
Box 1204
Belvedere, CA 94920

June 13, 2013

FEMA
P O Box72379
Oakland, CA 94612
(Fax) (510) 627-7147

To Whom It May Concern:

I am writing in opposition to the plan now under consideration to remove Eucalyptus and other "non-native" trees from the East Bay hills including many thousands on the UC Berkeley campus and in Oakland and Richmond.

This plan has been proposed as a fire-safety measure when in reality it is nothing of the sort, but is instead an ideologically-driven effort by a small group of native plant advocates who would strip these hills of the magnificent groves of mature trees in order to promote their ill-conceived vision of a landscape restored to its "original" aspect. These ideologues have a very weak case to make in favor of a "native only " landscape, have little support outside of their own insular group of true-believers, and are opposed by most residents of the Bay Area who are concerned with the beauty and preservation of our surroundings. They are therefore exploiting a natural fear of fire to gain support for this destructive plan by making claims for which there is no scientific evidence. Since what support they do have from the general public is based solely on these demonstrably false claims it is imperative that your agency make a careful examination of the facts. This is too important a matter to allow the confusion over fire hazard and proper safety measures to affect your judgment as it has some of the headline –skimming public.

The enormous cost to the public purse for this plan is yet another reason to oppose it. For a fraction of the cost the Eucalyptus groves could be kept fire-safe by periodic debris removal. Intelligent management and maintenance is the answer, not wholesale destruction.

The facts which will refute the many false claims are available on-line. Please become informed of them and make your decision accordingly—say NO to the cutting-down of these beautiful and valuable trees.

Sincerely,

Thomas E. (Todd) Stanton

6.12.13

RECEIVED
JUN 17 2013
BY:

Dear F.E.M.A:

In adding our voices to those calling for a reworking of the East Bay Parkland Hills E.I.S. to an eco-sensitive approach, we quote Henry David Thoreau:

> "It would be worth the while to ask ourselves weekly,
> Is our life innocent enough? Do we live *inhumanely*,
> toward man or beast, in thought or act? To be serene
> and successful we must be at one with the universe.
> The least conscious and needless injury inflicted on
> any creature is to its extent a suicide. What peace –
> or life – can a murderer have?"

Sincerely,

Tom Glass & R. Penn

Tom Glass and Rebecca Penn

Berkeley

From: Tony Holiday
To: EBH-EIS-FEMA-RIX
Subject: Stop this Nonsense!
Date: Wednesday, May 08, 2013 7:17:33 PM

How can you even consider for a moment cutting down all those East Bay Hill trees? Have you all lost your minds? This is 2013, not the 1950s. We need our trees more than ever. No tree-felling of healthy trees ANYwhere and no pesticides.

What we need now are environmentalists with common sense!

Please stop this deforestation and overdoing of all this native plant silliness. We need to preserve and protect our environment, not further harm it.

-- A concerned environmentalist,

Tony Holiday
San Francisco

From: Anna Ransome
To: EBH-EIS-FEMA-RIX
Subject: I"m the 16th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:38 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> What people don't realize is that these taller trees are the only habitat for many species, such as owls and raptors since many of their traditional nesting sites, native trees, have been removed. These species won't just nest anywhere and even if they do the nesting will probably not be successful. You can't cut essential nesting sites down and plant saplings. The money should be spent on replacement trees to be planted and tended until they provide the equivalent habitat for these species. Then they have alternatives when you cut down these trees. This is the typical approach to a human-caused problem. It is not so simple.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848329&target_type=custom&target_id=21317

Anna Ransome
Graton, CA

This email was sent through SignOn.org, a free service that allows anyone to set up their own online petition and share it with friends. SignOn is sponsored by MoveOn.org Civic Action, but MoveOn does not endorse the contents of any petitions. If you have any questions, please email signon@signon.org. If you don't want to receive further emails updating you on how many people have signed this

petition, click here: http://www.signon.org/delivery_unsub.html?e=xH6bm7btHgt1XQnAc8fwEiBFQkgtRUlTLUZFTUEtUklYQGZlbWEuZGhzLmdvdg--&petition_id=42455.

From: Don Forrester
To: EBH-EIS-FEMA-RIX
Subject: I"m the 20th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:37 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> There are better ways to improve this area as pointed out in the petition.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848338&target_type=custom&target_id=21317

Don Forrester
Sacramento, CA

This email was sent through SignOn.org, a free service that allows anyone to set up their own online petition and share it with friends. SignOn is sponsored by MoveOn.org Civic Action, but MoveOn does not endorse the contents of any petitions. If you have any questions, please email signon@signon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://www.signon.org/delivery_unsub.html?e=xH6bm7btHgt1XQnAc8fwEiBFQkgtRUlTLUZFTUEtUklYQGZlbWEuZGhzLmdvdg--&petition_id=42455.

From: Peter Sorcher
To: EBH-EIS-FEMA-RIX
Subject: I"m the 35th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:36 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> This is a waste of tax payer money and will decrease home values. It's not a reasonable solution.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848332&target_type=custom&target_id=21317

Peter Sorcher
Tamalpais Valley, CA

This email was sent through SignOn.org, a free service that allows anyone to set up their own online petition and share it with friends. SignOn is sponsored by MoveOn.org Civic Action, but MoveOn does not endorse the contents of any petitions. If you have any questions, please email signon@signon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://www.signon.org/delivery_unsub.html?e=xH6bm7btHgt1XQnAc8fwEiBFQkgtRUlTLUZFTUEtUklYQGZlbWEuZGhzLmdvdg--&petition_id=42455.

From: Commissioner Phoebe Sorgen
To: EBH-EIS-FEMA-RIX
Subject: I"m the 36th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:35 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> This plan is unacceptable. Though, non-native, invasive, highly flammable trees like euc's are a prob, before removing (without any herbicides!), non-flammable natives like redwoods need to be cultivated.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848330&target_type=custom&target_id=21317

Commissioner Phoebe Sorgen
United States

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From: R Bose
To: EBH-EIS-FEMA-RIX
Subject: I"m the 9th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:34 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> This widespread action against trees would be shocking at any time, but is particularly so in a time of climate change.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848333&target_type=custom&target_id=21317

R Bose
San Francisco, CA

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From: Madeline Hovland
To: EBH-EIS-FEMA-RIX
Subject: I"m the 23rd signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:31 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> The proposals to cut thousands of trees, if allowed to go forward, will result in an environmental disaster. When the tall trees are cut down, weeds, tall grass and shrubs will replace them; this type of vegetation is much easier to ignite and more flammable than trees.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848334&target_type=custom&target_id=21317

Madeline Hovland
Berkeley, CA

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From: Emily Hancock
To: EBH-EIS-FEMA-RIX
Subject: I"m the 21st signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:28 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> Do not cut down the tall trees. The hills are not an asphalt highway. Please come to your senses. Emily Hancock

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848335&target_type=custom&target_id=21317

Emily Hancock
Berkeley, CA

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From: Lu Carpenter
To: EBH-EIS-FEMA-RIX
Subject: I"m the 11th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:26 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> Stop robbing us of our trees! We need more trees than ever with the current climate crisis. We also don't want more toxic herbicides poured over our neighborhoods - these get on people and pets, kill wildlife, get tracked into our indoor environments, and wind up in the bay.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848331&target_type=custom&target_id=21317

Lu Carpenter
San Francisco, CA

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From: Maxina Ventura
To: EBH-EIS-FEMA-RIX
Subject: I"m the 30th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:43 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> Absolutely no toxic herbicides should be used at all. In 2005 and 2006 East Bay Pesticide Alert handed toxicology of the pesticides UC, EBRPD, and other agencies, use in the hills and were pushing the city of Oakland to use. There is no need for any pesticide use at all and these trees, our local lungs, must be left standing until their natural deaths bring them down. There is no question of the danger of releasing the sequestered carbon in these old and young trees, and there is no question about the danger of the pesticides which are planned for use in this disastrous program.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848339&target_type=custom&target_id=21317

Maxina Ventura
San Leandro, CA

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e=xH6bm7btHgt1XQnAc8fwEiBFQkgtRUlTLUZFTUEtUklYQGZlbWEuZGhzLmdvdg--&petition_id=42455.

From: WilliamA Lofft
To: EBH-EIS-FEMA-RIX
Subject: I"m the 4th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:41 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> I'll support any lawsuit or legislation to stop FEMA. This is simply insane!

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848336&target_type=custom&target_id=21317

WilliamA Lofft
San Diego, CA

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From: Barbara
To: EBH-EIS-FEMA-RIX
Subject: I"m the 24th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:38 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> First it's deforestation, which makes it easy for developers swoop in after the public loses interest in using the area.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848337&target_type=custom&target_id=21317

Barbara
San Francisco, CA

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From: Hills Conservation Network
To: EBH-EIS-FEMA-RIX
Subject: 46 signers: Stop the deforestation of the Berkeley/Oakland Hills petition
Date: Wednesday, May 08, 2013 8:08:03 AM

Dear FEMA,

I started a petition to you on SignOn.org titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, the petition has 46 total signers.

You can email all petition signers by clicking here:
http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

To download a PDF file of all your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848457&target_type=custom&target_id=21317

Thank you.

--Hills Conservation Network

If you have any other questions, please email signon@signon.org.

The links to download the petition as a PDF and to respond to all of your constituents will remain available for the next 14 days.

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From: Alicia Snow
To: EBH-EIS-FEMA-RIX
Subject: I"m the 42nd signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 7:30:52 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 42 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> I am appalled that such a plan is even being considered. FEMA must not support any tree felling or poisoning. We need all the trees we can get to sequester carbon dioxide.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848417&target_type=custom&target_id=21317

Alicia Snow
San Francisco, CA

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From: kathleen daniel
To: EBH-EIS-FEMA-RIX
Subject: I"m the 39th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 6:49:40 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 39 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> I do not believe FEMA should be spending money on removing tall trees.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848362&target_type=custom&target_id=21317

kathleen daniel
New York, NY

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From: Pamela Walatka
To: EBH-EIS-FEMA-RIX
Subject: I"m the 46th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 8:09:02 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 46 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> Please stop the "ethnic cleansing" of our trees.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848456&target_type=custom&target_id=21317

Pamela Walatka
Los Gatos, CA

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From: Claudia Delman
To: EBH-EIS-FEMA-RIX
Subject: I"m the 10th signer: "Stop the deforestation of the Berkeley/Oakland Hills"
Date: Wednesday, May 08, 2013 5:54:22 AM

Dear FEMA,

I just signed a petition addressed to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, 36 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130522-bKuJCv

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

My additional comments are:

> Please keep the hills intact and do not poison the wildlife!

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=848328&target_type=custom&target_id=21317

Claudia Delman
Berkeley, CA

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From: Gary Molitor
To: EBH-EIS-FEMA-RIX
Subject: clear-cutting the Berkeley-Oakland hills
Date: Tuesday, May 07, 2013 12:24:32 PM

I oppose the clear-cutting the Berkeley-Oakland hills.
This project has nothing to do with fire prevention as thoughtful analysis has shown.
It is all about destroying an existing ecosystem for an artificial construct grievously call "Native Plant Restoration"
This native plant movement is a religious philosophy based on emotional justification.

Gary William Molitor
http://www.garymolitor.com/
841 St. Mary Avenue
San Leandro, CA 94577-3853
510-568-7888 510-200-5332

From: anne
To: EBH-EIS-FEMA-RIX
Subject: Outrageous
Date: Monday, May 06, 2013 7:24:48 PM

This can only remind me of the many years where we insisted upon fireproof pajamas for children which later turned out to cause cancer

Who is responsible for this edict to destroy the diversity of nature in the Oakland Hills area? Sounds like another small group who will gain financially by this action or another small group of fearful people. Our whole government is run by via small but very active and loud and funded groups.

These projects would permanently alter the Berkeley/Oakland hills ecosystem, resulting in the loss of tens of thousands of mature trees, the application of massive amounts of toxic herbicides, destruction of an enormous amount of habitat, decreasing slope stability/increasing slide risk, and the release of very significant amounts of sequestered CO2.
Signed
Anne Wolff,Ph. D
Larkspur

From: Hills Conservation Network
To: EBH-EIS-FEMA-RIX
Subject: 354 signers: Stop the deforestation of the Berkeley/Oakland Hills petition
Date: Sunday, May 12, 2013 8:25:20 AM

Dear FEMA,

I started a petition to you on SignOn.org titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, the petition has 354 total signers.

You can email all petition signers by clicking here:
http://signon.org/target_talkback.html?tt=tt-42455-custom-21317-20130526-SIwkkI

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

To download a PDF file of all your constituents who have signed the petition, including their addresses, click this link: http://www.signon.org/deliver_pdf.html?job_id=853016&target_type=custom&target_id=21317

Thank you.

--Hills Conservation Network

If you have any other questions, please email signon@signon.org.

The links to download the petition as a PDF and to respond to all of your constituents will remain available for the next 14 days.

This email was sent through SignOn.org, a free service that allows anyone to set up their own online petition and share it with friends. SignOn is sponsored by MoveOn.org Civic Action, but MoveOn does not endorse the contents of any petitions. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://www.signon.org/delivery_unsub.html?e=xH6bm7btHgt1XQnAc8fwEiBFQkgtRUlTLUZFTUEtUklYQGZlbWEuZGhzLmdvdg--&petition_id=42455.

From: MarloweT@aol.com
To: EBH-EIS-FEMA-RIX
Subject: Stop the deforestation of the Berkeley/Oakland Hills
Date: Friday, May 10, 2013 10:50:54 AM

The Hills Conservation Network has been fighting to prevent you FEMA from allowing UC/Oakland to use federal disaster mitigation funds to clearcut ALL of the tall trees in the hills. They are targeting eucalyptus, pines, and acacia for complete eradication, not because of a fire risk, but because these species are despised by the native plant restoration community. They have dismissed proposed "species neutral" fire mitigation strategies that would be cheaper, would use far fewer herbicides, and would be far more effective in lessening fire risk because the native plant restoration agenda wouldn't be advanced.

That's why I signed a petition to FEMA.

STOP THIS MINDLESS AND SENSELESS CLEARCUTTING.

Marlowe Teig

From: Anna Zbitnoff
To: EBH-EIS-FEMA-RIX
Subject: Clear cutting in Oakland and Berkeley
Date: Saturday, May 18, 2013 10:58:58 PM

This is one of the most assinine things I've heard of. It's like Angelina Jolie cutting off her breasts to prevent breast cancer. Don't do it! Leave the trees alone!!

From: D Dorenz
To: EBH-EIS-FEMA-RIX
Subject: re: non native tree removal in Berkeley"s Strawberry Canyon and surrounding hills
Date: Saturday, May 18, 2013 9:21:59 PM

As a Berkeley resident, I am writing to object to the removal of so many trees by UC Berkeley in the Berkeley Hills. The rationale for this removal is supposedly fire suppression so that native trees will grow there instead.
It takes a long time for trees to grow after so many are chopped down and when herbicides are used to prevent future growth.

Native trees in the Strawberry Canyon area are suffering from the beatle -fungal blight and so the natives, Oaks and Bay Laurel, are dying at an alarming rate. If you want to see a fire hazard, all one has to do is walk the Strawberry Canyon trail to see the dying trees which are skeletons of their former selves and make great food for fires. What this means is that if the University really cared about fire suppression, the University would cut those dead and almost dead NATIVE trees to prevent fires there. This would be very sad, but truth is, they aren't thriving. Why does the University think that natives will thrive in the Berkeley Hills when they have no means to control this blight? I can see that the new growth of these native trees are also infected.

Cutting down thousands of trees is harmful to the environment due to soil erosion and the fact that the trees are no longer helping to create oxygen to purify our air. We need those trees. In the areas where UC has already chopped down many trees, they never replanted new ones. It is unsightly and worse: there is erosion that has to be held back by tarps and other weird contraptions which are not very effective. It would be a far healthier approach to thin the Eucalyptus trees to prevent fires and leave the other non natives. But the University has a vendetta against non natives that leads to bad policy: soil erosion and loss of our air purifiers when there is no assurance that native trees can survive under the current environmental conditions that make the beatle/fungus blight so pervasive and destructive. Please do not allow this bad policy to proceed using FEMA funding. Thanks for your attention to this matter.
Sincerely,
Dorothea Dorenz
1200 Neilson St. B
Bereley, Ca. 94706

--
Dorothea

From: Susan Goodman
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk
Date: Saturday, May 18, 2013 7:03:17 PM

The proposed clear cutting of trees and application of herbicide is an outrageous use of resources, and must not go forward.
Sincerely,
Dr. N.S. Goodman

--
"It is the duty of the peaceful warrior to be unreasonably happy." -Dan Milman

From: Sam kastajoles
To: EBH-EIS-FEMA-RIX
Subject: Tree cutting in Berkekely
Date: Saturday, May 18, 2013 6:57:01 PM

I oppose the clear cutting in Strawberry Canyon and other canyons in and around UC Berkeley. The hills of the East Bay are beautiful and provide homes to a multitude of wildlife.

To clearcut the area and put down chips sprayed with Roundup is environmentally unsound science. First, you are evicting and killing off wildlife. Second, you are polluting the ground with poison. Third, in this era of climate change, we need all of the trees we can get to offset carbon emissions.

If you are truly interested in reducing fire hazard, then have the convict crews go through and reduce dead undergrowth and low branches to eliminate the ladder effect in a fire. I realize this is a little more time intensive than moving in massive bulldozers , but it is a win-win situation. The trees get to stay, the public still gets to enjoy nature, the animals get to stay. AND, most importantly NO POISONS are introduced into the environment.

Don't let Monsanto dictate how fire safety should be done. This sounds like a government kickback to Monsanto. Follow the Monsanto money trail to the FEMA official who first proposed this terrible idea

From,

Stacey Kaller
2212 Bush Ave.
San Pablo, CA 94806

From: Eliza Strickland
To: EBH-EIS-FEMA-RIX
Subject: objection to fire reduction plan
Date: Saturday, May 18, 2013 6:43:20 PM

I am writing to submit my public comment to the fire reduction plan.

I strongly object to the plan to chop down 22,000 trees in Berkeley's historic Strawberry and Claremont Canyons and over 60,000 more in Oakland. These trees have been there for decades and hardly constitute a "hazard." If you are truly concerned about the fire risk in that area, please investigate other solutions, like fire monitoring technologies.

Thank you,
Eliza Strickland

From: jfossgreen@gmail.com on behalf of Josh Fossgreen
To: EBH-EIS-FEMA-RIX
Subject: Against the proposed clear-cutting
Date: Saturday, May 18, 2013 6:11:26 PM

Hi!

I'm a lifetime resident of the Bay Area and I am against the proposed clear cutting! The beautiful trees in this area are part of what makes Berkeley and Oakland special. Chopping down trees contributes to climate change, which is responsible for worsening wildfires. The proposed spraying of Roundup makes it clear that you guys aren't acting in the public interest.

Act like better people! Give a shit about the environment! If we keep torching the earth, what will we live on?

Josh Fossgreen
Voter

From: catherineyronwode
To: EBH-EIS-FEMA-RIX
Subject: Stop cutting trees
Date: Saturday, May 18, 2013 6:02:10 PM

To All,

The plan to eliminate trees in Strawberry Canyon and other East Bay sites is ecological mismanagement at its worst.

Managing forests is an art. Clear-cutting is a death sentence to tens of thousands of animals and plants.

The use of herbicides to enforce a "death zone" will come back to haunt you and your children.

This is sheer insanity.

Stop.

catherine yronwode
Whittier Elementary School 1958
Garfield Jr. High School 1961
Berkeley High School 1965

From: Lydia Fossgreen
To: EBH-EIS-FEMA-RIX
Subject: regarding East Bay Hills hazardous fire risk reduction project
Date: Saturday, May 18, 2013 5:55:30 PM

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how about NO. seriously. the earth was built the way it was for a reason, and maiming the shit out of it is not going to make anyone safer. this is so dumb. ugh. stop it. ever fucking heard of permaculture? cocks

From: Carly Mitchell
To: EBH-EIS-FEMA-RIX
Subject: Fire risk reduction
Date: Saturday, May 18, 2013 5:45:08 PM

As a citizen of Berkeley I am concerned about this project. I do not want thousands of trees cut down unless they are invasive species or already dead. I also do not want roundup used as a control method. Carly Mitchell

Sent from my iPhone so please disregard all typos.

From: Christine Federici
To: EBH-EIS-FEMA-RIX
Subject: FEMA"s Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Saturday, May 18, 2013 5:40:38 PM

To whom it may concern:

I am greatly angered and saddened and concerned about your proposal to murder 85,000 trees in the Strawberry and Claremont Canyon area of Berkeley/Oakland and then spray the area with the deadly and dangerous pesticide 'Roundup'. I have been living in the San Francisco bay area since the 1980's and consider it my home. Most of those years were spent living in the East Bay. Strawberry and Claremont Canyons have always been a large part of the experience of living here. The proposal to clear cut the trees in this area is as ludicrous as someone making the choice to cut off a healthy part of their body to prevent disease! And then to replace the trees with a poisioneous pesticide is beyond madness. What are you thinking?!!? This is not an efficient way to prevent fire and the health risks to humans and animals and the trees themselves is not worth it! Please, don't do this.

Christine Federici
an Oakland citizen

From: David Eisenberg
To: EBH-EIS-FEMA-RIX
Subject: Reported plans to clearcut trees in the Oakland and Berkeley California area
Date: Saturday, May 18, 2013 5:24:03 PM

Dear FEMA people,

If what I have read in the media is correct, the plans to cut thousands of trees in Strawberry and Claremont canyons in Berkeley and Oakland California because they pose a fire hazard are extraordinarily misguided, counterproductive, and alarming.

Beyond the obvious, important and multifaceted roles such mature vegetation plays in soil stability and health, in local climate and habitat maintenance, and the recreational and scenic value of these areas, there is the matter of the proposed use of large quantities of the toxic herbicide Roundup. What protection would be provided to keep this herbicide out of the watershed? Why are there no plans for replanting these hillsides?

Clearcutting these trees and then covering the barren hillsides with deep wood chips as mulch will
do nothing to protect the soil or those downhill and downstream from runoff from significant rain events. Without the trees, there will be higher temperatures and more runoff. Creating a buffer around buildings is one thing, but clearcutting tens of thousands of trees is quite another.

There needs to be much more public input and careful study of this planned action and its justification and actual impacts.

Please reconsider this action.

Sincerely,

David Eisenberg
Executive Director
Development Center for Appropriate Technology
www.dcat.net
PO Box 27513
Tucson, Arizona 85726-7523

From: Debbie Spangler
To: EBH-EIS-FEMA-RIX
Subject: Public comment: San Francisco area tree-cutting and herbicide
Date: Saturday, May 18, 2013 5:17:20 PM

Please do not allow the clear-cutting of 85,000 Berkeley and Oakland Trees, and the pouring of 1400 gallons of herbicide is especially egregious! The toxic chemicals foul our water and wildlife and should not be considered in any amount.

Sincerely, Deborah Spangler

From: Claudia Gerst
To: EBH-EIS-FEMA-RIX
Subject: Very disturbed to find out about FEMA plan to destroy trees!!!
Date: Saturday, May 18, 2013 5:03:57 PM

I am a citizen of Berkeley, love the surrounding East Bay Hills and beautiful nature embellishing them, and am very disturbed about the Fema plan to destroy 80,000 thousand trees in Berkeley and Oakland! It is not only destructive of our beautiful hills and trees, it is unacceptable to use the very toxic "Roundup" on the area to prevent new trees from sprouting. I am sure there are other more natural means to keep the Oakland and Berkeley Hills safe from wildfires. We should say no to FEMA, and explore other solutions.

Claudia Gerst
1211 Francisco St.
Berkleley, Ca
(510) 525-4144

From: Pat Eisenberg
To: EBH-EIS-FEMA-RIX
Subject: Shocked
Date: Saturday, May 18, 2013 4:45:48 PM

Dear people at FEMA,

I am shocked - horrified, in fact - that you are planning to cut down trees in Berkeley and Oakland - tens of thousands of trees in Strawberry and Claremont canyons, if the news reports are correct - and poison the soil with cancer-causing agents to prevent regrowth of trees.

Is there no one in your agency who understands the hydrologic cycle? The function of soil? The value of trees?

Please reconsider this rash action.

Sincerely yours,

Pat Eisenberg
Registered professional engineer (civil)
2702 East Seneca Street
Tucson, Arizona 85716

From: zoon fiza
To: EBH-EIS-FEMA-RIX
Subject: DO NOT DO AWAY WITH OUR TREES!
Date: Saturday, May 18, 2013 4:41:37 PM

To Whom it May Concern:

When I heard this week that the federal government would be funding the clear-cutting of 85,000 beautiful Berkeley and Oakland trees, including 22,000 in historic Strawberry and Claremont Canyon, my initial reaction was disbelief. I then wondered how the feds have money for this destructive project while Head Start and public housing programs are being cut due to the sequester.

Strawberry and Claremont Canyons have been like a second home for me and my family on the weekends. They're regional treasures that attract people to live in the surrounding areas. The trees in Strawberry and Claremont Canyon are precious resources that have been there for decades and hardly constitute a "hazard." But pouring 1400 gallons of herbicide on the currently pristine hills will create a real hazard, and UC Berkeley even plans to use the highly toxic herbicide "Roundup" (known to be carcinogenic) to squelch the return of non-native vegetation.

Please rethink your proposal and opt for more ecologically (and economically) sane methods to manage fire risk.

Sincerely,

Meagen Grundberg

From: Laura Woodford
To: EBH-EIS-FEMA-RIX
Subject: clear cutting is insane
Date: Saturday, May 18, 2013 4:37:36 PM

When I heard this week that the federal government would be funding the clear-cutting of 85,000 beautiful Berkeley and Oakland trees, including 22,000 in historic Strawberry and Claremont Canyon, my initial reaction was disbelief. Second reaction was shock. Third reaction was extreme anger. Please reconsider this foolish plan. Trees help hold in soil, keep areas cool and are habitat, food and protection for the wildlife, birds and climate. Furthermore, using Round-up for herbicide is really extremely controversial and foolish. Round-up may be linked to cancer, childhood diseases and autism complications and is hazardous to wildlife in general.

Please do not move forward with this poorly thought-out and environmentally backward plan.

--

Laura Woodford
resident,
Alameda, California

From: sk8orinda@gmail.com on behalf of Xander Fischer
To: EBH-EIS-FEMA-RIX
Subject: Deforestation
Date: Saturday, May 18, 2013 4:26:13 PM

Stop this heinous removal of beautiful foliage in Berkeley and Oakland! This is a beautiful area, and it needs to be preserved as it is.

From: lois olmstead on behalf of Lois Olmstead
To: EBH-EIS-FEMA-RIX
Subject: Tree Cutting in Berkeley and Oakland
Date: Saturday, May 18, 2013 4:16:31 PM

I am writing to oppose the planned cutting of trees and use of herbicides in the Berkeley and Oakland hills. The wholesale destruction of these beautiful trees is unacceptable, entirely unnecessary and expensive, to boot! I've lived most of my 69 years in the Bay Area. We had one fire, and granted, it was a major one, but it was caused by an error by the fire department and the small grasses and bushes alongside the freeway caught the fire and carried it up into the hills. Otherwise, we haven't had a fire.

Clearing of undergrowth will suffice to reduce fire danger. The goat program that is being utilized for clearing vegetation is an excellent one.

Please leave our beautiful trees alone!

Lois Olmstead
3343 Las Huertas Rd.
Lafayette, CA 94549
925-283-3345

From: Andy Hilal
To: EBH-EIS-FEMA-RIX
Subject: NO to Strawberry / Claremont Canyon tree clearings!!
Date: Saturday, May 18, 2013 4:13:18 PM

This is a horrible plan! Please don't spend my tax dollars clear cutting my local trees!!

From: Theo Cedar Jones
To: EBH-EIS-FEMA-RIX
Subject: I oppose your plan to cut trees and apply Roundup to Strawberry Canyon
Date: Saturday, May 18, 2013 4:01:08 PM

Dear FEMA,

You absolutely must not go forward with your plan to cut trees in Strawberry Canyon or Claremont Canyon. And you must not apply toxic pesticides to these areas. These areas are sacred to me, and I will peacefully oppose any attempts by you to harm them.
Love,
Theo Cedar Jones
Oakland, CA

From: Lisa Sleeth
To: EBH-EIS-FEMA-RIX
Subject: NO for East Bay Hills cutting
Date: Saturday, May 18, 2013 3:30:05 PM

NO to clear-cutting of 85,000 beautiful Berkeley and Oakland trees, including 22,000 in historic Strawberry and Claremont Canyon.

Lisa Sleeth

From: Fenua Ibabao
To: EBH-EIS-FEMA-RIX
Subject: DONT BE AN ASS
Date: Saturday, May 18, 2013 2:48:08 PM

DONT CLEAR CUT THE TREES

From: Laura Sutherland
To: EBH-EIS-FEMA-RIX
Subject: ALERT: The Cutting of trees and Herbicide spraying!!
Date: Saturday, May 18, 2013 2:44:11 PM

To FEMA,

WHY are you wasting so much money on cutting down 85,000 trees in Berkley and Oakland? Trees we will never get back. AND then pouring the highly toxic herbicide call RoundUp on OUR ....I repeat OUR LAND. This herbicide will get into our water supply and do a lot of damage on the way. This land is NOT yours to destroy. I do not care who THINKS they own it - it belongs to the people and the several generations that have yet to be born. Our Gov. has done enough to harm our water, air , earth and natural resources.....STOP and listen to your heart.

Please!!!

Laura Sutherland

From: Mominguarpok Inotowok
To: EBH-EIS-FEMA-RIX
Subject: do not take our trees
Date: Saturday, May 18, 2013 2:35:28 PM

I am an Oakland resident.

I learned today of FEMA -- the federal government -- coming to clear cut OUR trees away from us.

Do not.

Please do not.

Please allow our local communities to determine our fire safety needs.

This destruction WILL NOT make us safer. (see below)

Nancy Inotowok

These projects are more likely to **increase the risk of wildfires** than to reduce that risk.

By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will **damage the environment** by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will **endanger the public** by dousing our public lands with thousands of gallons of toxic herbicides.

From: Kimberly Chun
To: EBH-EIS-FEMA-RIX
Subject: DO NOT clearcut trees in Strawberry and Claremont canyons
Date: Saturday, May 18, 2013 2:05:07 PM

To whom this may concern,

I want to protest and put in my two cents about this planned clear-cutting of trees in Berkeley and Oakland in the Strawberry and Claremont canyons.

These trees are NOT a fire-hazard and greatly enhance and add to the area's beauty. The use of roundup to prevent them from returning WILL be a hazard to our community. Do NOT proceed with this plan.

I will pass this info along to everyone I know.

I also want to be added to the email list of updates on this matter.

Thanks, Kimberly Chun

From: gwalters415
To: EBH-EIS-FEMA-RIX
Subject: Berkeley and Oakland Tree cutting
Date: Saturday, May 18, 2013 1:59:55 PM

As a local resident I find the plan to cut down thousands of trees by FEMA unacceptable. This plan is just crazy and the government certainly has more important things to spend money its money on. Please reconsider the impact this will have on the environment and the future of the Bay Area! There's got to be a better way to protect UCB from potential future fires. Thanks.

Respectfully,
George Walters
1005 Market St, #408
San Francisco, CA 94103

From: Jennifer
To: EBH-EIS-FEMA-RIX
Subject: STOP the decimation of our beautiful trees!
Date: Saturday, May 18, 2013 1:22:58 PM

I am completely outraged to hear of the plans to cut down so many trees in Berkeley and Oakland.
This plan is absolutely ridiculous and applying the mass amount of herbicides will be detrimental to the entire ecosystem and the surrounding areas. I have been a resident of Oakland for many years, and have enjoyed hiking all over the parks.
Please ! Please ! Please ! stop these horrific plans and find something better to do with our tax dollars.
Jennifer Griffith
maaagikhappens@gmail.com

From: Eric Burns
To: EBH-EIS-FEMA-RIX
Subject: Stop The Destruction of Strawberry and Claremont Canyons
Date: Saturday, May 18, 2013 1:03:02 PM

Dear FEMA and Others-

Please don't clear cut the Strawberry and Claremont canyons. It's just ridiculous. I know you (FEMA) and UCB somehow see 100,000 bucolic trees and pristine canyons as a fire hazard, but come on, let's be serious.

Your plan to cut down all the trees and then spread 24" of woodchips to make up for it is just incomprehensible. And then adding Roundup to the equation is so beyond insulting.

Eric

Eric Burns
Los Angeles, CA

From: Massimo Barbagallo
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyon
Date: Saturday, May 18, 2013 12:58:15 PM

I have a PhD in physics from the University of Cambridge, just to explain you that I am capable of forming a scientific opinion on a subject. I also live in Los Angeles, so I know that fire hazards are important to keep in check. I believe that the project of cutting down the historical trees (including Strawberry and Claremont Canyon) and spraying the area with herbicide is not only unwarranted from a scientific point of view, but also more damaging than any potential (perhaps imaginary) fire hazard. We have a duty to protect the environment, including these trees. Herbicide are pollutants and toxic, we cannot just spray them anywhere, just in case. Is the university planning to sell the wood from cutting the trees? I wonder if the real reason is making money out of it.

I hope you will stop this project, it is a crime against humanity, and I certainly hope you will not find it with taxpayer's money.

Kind Regards
Massimo

From: Bianca Waldron
To: EBH-EIS-FEMA-RIX
Subject: Regarding: Clear cutting in CA Bay area
Date: Saturday, May 18, 2013 12:49:21 PM

My name is Bianca,I am composing this email to inform you I vehemently oppose your intent to clear-cut the bucolic forests of the Strawberry and Claremont Canyon areas in the East Bay of California. This action is atrocious, despicable and cannot come to completion.

This deforestation will haphazardly disrupt the ecological niches for all organisms in the forest, including the humans outside. I am sure you are aware of the ecological importance that trees play in balancing the CO2/O2 levels in our atmosphere as well as providing a home to many keystone species which inhabit our forests.

While I understand a periodically need to *thin* out the forest to prevent uncontrollable fire hazards (due to the fact that we prevent the natural course of forests fires which paves way for new species and prevents the build up of underbrush, the main contributor to the uncontrollable factor of modern forest fires) one must understand that clear-cutting then dumping an estimated 1000+gallons of MONSANTOS ROUNDUP is not the path to take! The destructive repercussions of such thoughtless actions are innumerous!
This will lead to soil erosion, disruption of the nitrogen fixation that composes nutrient rich oil, contamination of our soil and water, loss of the home for native species, possible invasion of INVASIVE SPECIES and those are just to name a few. Please don't further destroy my planet, my home, my beautiful state of California. We are better than this, we are better than thoughtless profits.

-A decent human being.

From: morin.holly@gmail.com
To: EBH-EIS-FEMA-RIX
Subject: Please reconsider
Date: Saturday, May 18, 2013 12:42:51 PM

What you need to do is find a way to protect and preserve the beautiful foliage of Berkeley. Why denude the Strawberry Canyon area when it provides needed shade, co2, and beauty?
Once done this foliage cannot be replaced, and to saturate the area with pesticides and RoundUp is utterly insane.
Shame on you FEMA people.
I am practically speechless at the absurdity of this proposal!
Holly Morin
PO Box 925
Minden NV
and
PO Box 822
Pescadero, CA
650-879-9265
775 901-1858

Sent from my iPad

From: Judith Kruger
To: EBH-EIS-FEMA-RIX
Subject: Leave Strawberry Canyon Alone!
Date: Saturday, May 18, 2013 12:38:27 PM

We urge you to cease and desist from the draft EIS plan to cut 85,000 trees from Strawberry Canyon (as well as spraying herbicide on the land) and to choose another, more environmentally friendly plan that does not destroy life in order to save life. These trees are our neighbors and friends and have the right to be protected. As a stakeholder and interested party in the East Bay, I speak directly to the representatives at FEMA and request you to propose another plan that does not harm our beautiful land, our trees, and does not put poison in the earth.

There MUST be more ideas and resources to work with than just clear cutting 85,000 trees. This is unacceptable and will not be tolerated.

Thank you for hearing my and my community's strong resistance to this plan.

From: Jesper Jurcenoks
To: EBH-EIS-FEMA-RIX
Subject: Please reduce fire risk at all cost.
Date: Monday, May 13, 2013 3:02:20 PM

Dear Fema.

I have no environmental concerns in regards to reduction of the fire hazard, as I am sure you work according to best practice for such cutting, pruning etc.

I am a frequent user of Redwood Regional Park (every day) and have no concerns over you cutting trees, shrubs, bushes, grass that pose a danger.

In case of a fire in Redwood Regional park my house and neighborhood would be in the front lines.

Jesper Jurcenoks

Board Member of Redwood Ridge Neighborhood Organization.

--
Jesper "JJ" Jurcenoks
Connect with me on LinkedIn
www.linkedin.com/in/jurcenoks

Don't print this email - Save a tree.

From: Joe Van Steen
To: EBH-EIS-FEMA-RIX
Subject: Comments regarding Draft East Bay Hills EIS
Date: Monday, May 13, 2013 2:39:14 PM

I would like to submit the following comments regarding the East Bay Hills EIS for Hazardous Fire Risk Reduction.

First, I would like to state my general agreement with the need for action and the overall objectives and purpose of the plan. I am a resident of the North Berkeley Hills area and reside a very short walk from a part of the affected areas in the project space identified as TI012. Being a life-long resident of the Bay Area, the fire hazard identified by this project has long been a significant concern to me.

However, while I am in general agreement with the project as proposed, I would like to voice a concern and objection to certain aspects of the project as proposed. My specific concern is the removal of forest and the replacement of forest with grassland, especially as proposed in the section of the plan under management of the East Bay Regional Parks department (EBRPD).

The specific areas of the proposal which create the highest concern for me are the areas closest to my home. This is because of both the issue of fire hazard relative to my home, and because these are the areas where I spend the majority of my time enjoying these open spaces. In a sense, these are the areas where I feel the greatest personal responsibility, and impact, in terms of how they are maintained. From that perspective, I am most impacted by the portions of the plan defined as the Strawberry Canyon PDM and Frowning Ridge PDM, owned by UC Berkley (UCB); and the portion of the EBRBD projects impacting Tilden Park.

I understand that there is little option other than a temporary deforestation as large groves of Eucalyptus are removed. This is unavoidable and largely a consequence of an environmental mistake that was made in the 1880's when these trees were planted. However, the issue now is one of how to provide follow-through on the proposed project. In that regard I applaud and support the portion of the UCB plan which identifies their goal to reforest the land in their purview with a "native forest of California bay laurel, oak, big-leaf maple, California buckeye, California hazelnut, and other native tree and shrub species." My problems lie with the EBRPD follow-on plans which "convert the majority of the eucalyptus and smaller amounts of coyote brush scrub and coastal scrub to successional grassland."

I do not believe the environmental impact report has accomplished an adequate or comprehensive review of the impacts of converting the involved EBRPD open space from forest to grasslands. Yes, there is a reduction in fire hazard, which is the primary objective of the project. However, it appears to me that there is also a significant adverse change to the character of the open space, both visually, sociologically, and environmentally. The area impacted by EBRPD already contains a mix of grassland and forest. If most of the forest is removed, since most of the forest is made up of non-native, fire hazard trees, then the entire character of the space becomes grassland. It would be much more appropriate, in my opinion, to replace forest with forest and attempt, over time, to retain the current forest/grassland mix of the hill space. This can be accomplished through the use

of native species as planned by UCB, and by expansion of plantings of California redwood which was native to the area before being cut down as lumber for building San Francisco in 1847-49. Most preferably, for me, with some expansion of redwoods.

Given today's environmental issue relative to CO2, I would have expected to find more material in the environmental impact statements that discussed impacts on CO2 levels as a consequence of deforestation, rather than the pro and con which I read which limited itself to discussion of CO2 production "in the event of a fire." CO2 aspects of forest while it is not burning should have received more and greater concern in the report. In addition, the difference between forest and grassland as animal habitat seems to be ignored. The hills in this area are home to significant numbers of forest animals, which are an important part of the enjoyment of the space. Animals which would repopulate a replacement forest but which will be lost if the area is converted to grassland.

These deficiencies in the current draft report should be corrected before a final report is completed and before any final decisions are made to move forward with the project..

Respectfully,

Joe Van Steen
148 Avenida Drive
Berkeley, CA 94708

From: Jack States
To: EBH-EIS-FEMA-RIX
Subject: Support for FEMA grant
Date: Monday, May 13, 2013 2:06:05 PM

To whom it may concern,

I would like to express my support for the prompt implementation of the $3,400,000 FEMA grant to Oakland, EBRPD, and UCBerkeley. I have been living in the Oakland Hills since 1980. I have been through the Oakland Hills Fire and have many friends who lost their homes. It is imperative that we not forget how truly catastrophic fires can be in our urban wildland interface. Please take prompt action and do not delay because of a few vocal residence.

John States
6807 Ridgewood Drive
Oakland, CA 94611

From: Remsen Belvedere
To: Marge Gibson; EBH-EIS-FEMA-RIX
Cc: openforum@northhillscommunity.org
Subject: Re: [NH OpenForum] EIS comment
Date: Monday, May 13, 2013 1:47:38 PM

The non-native houses should go too.

Sent from Yahoo! Mail for Windows 8
From: Marge Gibson <mfgibson@pacbell.net>
Sent: Mon, May 13, 2013 at 10:38 AM
To: <EBH-EIS-FEMA-RIX@fema.dhs.gov>
CC: <openforum@northhillscommunity.org>
Subject: [NH OpenForum] EIS comment

The FEMA grant for dealing with the combustible eucalyptus and monterey pine is critical to reducing the fire threat to the Berkeley Oakland Hill area. As the historical record so clearly shows, this area has been devastated by fire many times.

My personal experience as the Oakland Councilmember for the area in which the fire occurred is that there is very little that any fire department can do once the eucalyptus leaves begin to burn and fly in the winds. I was on duty at the Oakland emergency center from about 12:00 noon on the day of the fire. I will never forget the winds and was shocked to see eucalyptus leaves that showed some fire damage but were not completely burned actually being carried by the wind into downtown Oakland. They seem to have a shape that makes them very aerodynamic and with their oil are able to transmit fire easily.

These non-native trees are an incredible risk to lives and need to be eliminated.
Marjory Gibson Haskell, former Oakland Councilmember District One

_____
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From: Kim Kennedy
To: EBH-EIS-FEMA-RIX
Subject: Resident of Montclair/ Oakland
Date: Monday, May 13, 2013 1:06:41 PM

I just wanted to voice my support for any reduction of Euclyptus trees in the Oakland Hills area. As a resident for over 10 years, I cannot possibly find one reason to keep these trees. The fact that FEMA has allocated funds is delightful news.
Please carry on and trim away.

Sincerely,

Kim Kennedy

kim Kennedy
415-793-5521
Owner of The Claire - Corrective Skin Care Studio
http://www.the-claire.com/

From: Thomas Friedland
To: EBH-EIS-FEMA-RIX
Subject: claremont canyon eucalyptus trees
Date: Wednesday, May 15, 2013 4:03:14 PM

Dear FEMA,
I am writing to urge you to authorize removal of eucalyptus and other hazardous vegetation in the East Bay Hills. The EIS shows that the vegetation presents a fire hazard, and fires in the East Bay Hills are dangerous to both life and property.
Please act quickly.
Thomas Friedland
Berkeley, CA

From: Kitty Jones
To: EBH-EIS-FEMA-RIX
Subject: Don"t destroy the Berkeley/Oakland hills ecosystem.
Date: Wednesday, May 15, 2013 3:39:50 PM

Hello, I'm a UC Berkeley student that runs through the fire trials on a daily basis. I'm very upset to learn about the "fire hazard mitigation" applications, which would spell disaster for the ecosystem of the Berkeley/Oakland hills. I've very against this idea, a measured approach to fire management such as identifying clear fire threats via science not hearsay! At all costs we must not allow chemicals to be sprayed in the habitat of our local animal and plant species!
I have some important questions regarding this plan;
Amphibian species are going extinct more rapidly than any other species; how many amphibian species would be affected by this destruction of habitat? How many are threatened already?
Also, how much carbon dioxide is sequestered within these trees? And how much would be released into our atmosphere when they are destroyed?!

Thank you for your time and consideration,
I look forward to your response.
--
"The animals of the world exist for their own reasons. They were not made for humans any more than black people were made for whites or women for men."
Please don't eat animals. :)

From: Lewis Voils
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Hazardous Fire Risk Reduction Environmental Impact Statement
Date: Wednesday, May 15, 2013 2:55:53 PM

U.S. Department of Homeland Security
Federal Emergency Management Agency (FEMA) Region IX.

Re: East Bay Hills Hazardous Fire Risk Reduction Environmental Impact Statement

As a resident of the Berkeley/Oakland hills, we are writing to express our support for the Draft Environmental Impact Statement to reduce wildfire hazards in our neighborhood.

We have lived in the Oakland Hills for thirteen years and are keenly aware of the importance of this work. All of the houses in this neighborhood were lost in the Oakland Hills fire of 1991. It is our understanding that the majority of the fuel was from non-native trees, especially eucalyptus and Monterey pines. The neighbors that we are in contact with are all in agreement with the plan, and we are shocked, disappointed, and embarrassed that a small but vocal group has been successful in delaying action.

We also support this action for aesthetic reasons. The foliage to be removed crowds out our wonderful native plants. The most distinctive characteristic of California biology is its diversity, and we support this return to native plants.

Sincerely
Lewis & Nancy Voils
6925 Norfolk Rd
Berkeley, CA 94705

From: Belgrave House
To: EBH-EIS-FEMA-RIX
Subject: FEMA draft EIS
Date: Wednesday, May 15, 2013 1:06:30 PM

The points below bear repeating. Sometimes it feels like no one is listening, or that these valid points are being ignored.

These projects would permanently alter the Berkeley/Oakland hills ecosystem. UC and Oakland will clearcut tens of thousands of mature, healthy trees, some more than 100 feet tall and more than 100 years old.

The fire danger would be increased. The landscape would be transformed to easily ignitable chaparral (including scrub oaks), weeds, grass, hemlock, thistle and broom.

7 million dollars of taxpayer money would be wasted on destroying forests miles away from any residences. This is money that could and should have been spent on creating defensible space around houses and other structures, which is what FEMA originally intended that it be used for.

To prevent trees from resprouting, the hills would be drenched with massive amounts (30,000 + gallons) of toxic pesticides. In addition, pesticides will be sprayed throughout the watershed to knock down the weeds, hemlock, poison oak, thistle and broom that will emerge with the loss of canopy. Toxic sediments will seep into our creeks and could permanently alter the watershed.

Trees would be chipped on site, leaving up to 24 inches of chip litter on the ground. Additional risks: The danger of subterranean fire under the chips, as well as spontaneous ignition in the hot sun. Worst of all, this approach has been shown to not work, with massive invasion of hemlock, thistle, broom and poison oak where it has been tried.

An enormous amount of habitat would be destroyed; the tall trees favored by raptors such as owls and hawks would be lost forever. Without raptors to keep them in check, the rodent population will undoubtedly increase.

Without tree roots to hold the soil in place, erosion and landslides will increase.

Significant amounts of sequestered C02 will be released. adding not only to global warming, but also to local climate changes: more wind, more dry air, less fog, more air pollution. Big trees are needed to store carbon. No other type of vegetation stores as much carbon as tall hardwood trees. Ongoing carbon sequestration capabilities will be reduced from what they are now, and will never recover.

Visual blight, daily road closures, and constant chainsaw noise for 3 years will accompany these projects that are the most expensive, wasteful and ineffective way to reduce the potential for fire in our hills.

Hills Conservation Network has proposed an alternative that is less expensive, less environmentally destructive, and more effective at reducing the risk of fire. It was dismissed out of hand. We want FEMA to consider less destructive alternatives. The natural environment and the landscape that we love are at stake.

Please give consideration to these thought-out matters before destroying far too many trees.

Elizabeth Rotter

From: Monique Webster
To: EBH-EIS-FEMA-RIX
Subject: fire hazard mitigation in Berkeley/Oakland hills
Date: Wednesday, May 15, 2013 12:29:55 PM

To whom it may concern,

As a resident of Berkeley, parent to a nine month old baby and a healthcare professional, I am concerned about the proposed activities to mitigate the fire hazard in the Berkeley/Oakland hills. Air pollution, noise pollution, destruction of habitat and ecosystem and spraying of chemicals will have both short- and long-term effects on the environment and people that frequent these areas. I understand the real threat of wildfire but I urge you to consider using proven but safe techniques like regularly clearing dead plant debris from the ground and creating defensible clear areas.

Thanks,
Monique Webster, MPH
Berkeley, California

From: Jeanette Cool
To: EBH-EIS-FEMA-RIX
Subject: DESTRUCTION OF TREES AND USE OF ROUNDUP
Date: Thursday, May 16, 2013 11:14:32 AM

It is beyond comprehension that THIS is the answer to fire prevention - the destruction of tens of thousands
of trees, and then the pouring on of ROUNDUP herbicide from MONSANTO --

Is this really the BAY AREA -- I think not. I stand firmly against this move to poison the earth
and remove trees.

Who is thinking of these things?

STOP -- the destruction
STOP the poisoning of public lands.

From: Hills Conservation Network
To: EBH-EIS-FEMA-RIX
Subject: 795 signers: Stop the deforestation of the Berkeley/Oakland Hills petition
Date: Thursday, May 16, 2013 10:49:43 AM

Dear FEMA,

I started a petition to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, the petition has 795 total signers.

You can email all petition signers by clicking here:
http://petitions.moveon.org/target_talkback.html?tt=tt-42455-custom-21317-20130530-zoUPTn

The petition states:

> "The current Draft EIS is unacceptable as it will inflict enormous environmental damage, expose the public to thousands of gallons of toxic herbicide, destroy raptor habitats, destabilize steep slopes, and actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing more than 50,000 trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

To download a PDF file of all your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=859340&target_type=custom&target_id=21317

Thank you.

--Hills Conservation Network

If you have any other questions, please email petitions@moveon.org.

The links to download the petition as a PDF and to respond to all of your constituents will remain available for the next 14 days.

This email was sent through MoveOn's petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=xH6bm7btHgt1XQnAc8fwEiBFQkgtRUlTLUZFTUEtUklYQGZlbWEuZGhzLmdvdg--&petition_id=42455.

From: James Wagner
To: EBH-EIS-FEMA-RIX
Subject: Opposition to FEMA"s Plans to Clear-Cut 85,000 Berkeley and Oakland Trees
Date: Thursday, May 16, 2013 10:27:36 AM

Opposition to FEMA's Plans to Clear-Cut 85,000 Berkeley and Oakland Trees

Thinning trees and defensible space near buildings- Yes

Clear-Cutting - No!!!

All the best

James Wagner
w 805-893-5475

From: Michael Praus
To: EBH-EIS-FEMA-RIX
Subject: Clearcutting in the Berkeley and Oakland Hills Plus Use Of Herbicides
Date: Thursday, May 16, 2013 9:33:11 AM

To Whom It May Concern,

Your proposed measures seem harmful to the environment and could change the hills animal population's patterns and can wash herbicide into watersheds including the bay as Strawberry Creek meanders through Berkley and eventually reaches the Bay Shore Area. If you could give me in writing by e-mail (michaelp@wohc.org) one "benefit" of this FEMA sponsored devastation one of the last remaining forestation areas.

Please do not use these measures, there could be some reasonable clearing and thinning as a sound forest management tool.

Thank you for your consideration.

Regards,
Michael Praus
(510) 601-0167

From: Andrew Cheyne
To: EBH-EIS-FEMA-RIX
Subject: Don"t clear cut the East Bay Hills
Date: Thursday, May 16, 2013 9:01:40 AM

Destroying these trees has got to be the most short-sighted attempt to firefighting imaginable. Of course, these hills burned 25 years ago, and with human-caused climate change well under way, droughts and fires are increasingly a threat to our area. But taking out thousands of trees as a preemptive measure is Stalin's "scorched earth" policy incarnated. These canyons are critical areas for wildlife habitats, watersheds, soil regeneration, and recreation, all of which demand attention in addition to whatever fire risk is posed.

And holding these meetings while students are out of town, with very little publicity, seems a thinly veiled attempt to railroad through an unpopular, unnecessary policy before public opinion mobilizes. Do not cut the trees.

Andrew Cheyne
Richmond, CA

Andrew Cheyne, C.Phil.
Media Researcher
BMSG
510-204-9700
www.bmsg.org

From: Dan Grassetti
To: EBH-EIS-FEMA-RIX
Cc: Madeline Hovland; Bob Sand; jerry baer; Peter Scott; Michael Lozeau
Subject: priority comment
Date: Thursday, May 16, 2013 8:33:10 AM

Hello. Table 5.2-4 seems to make the case that implementing the proposed plan will actually make the crown fire risk higher. In discussing this with the Forest Service representative on Tuesday, she noted that she too had notice this and that it must be wrong. Is it wrong? Is it just an clerical error? It's important that this question be answered quickly as the answer will have a significant impact on subsequent comments. Please advise.

thanks,

Dan Grassetti

From: shyan_chang@yahoo.com
To: EBH-EIS-FEMA-RIX
Subject: support the wildfire hazard mitigation projects
Date: Thursday, May 16, 2013 7:56:09 AM

Shyan Lii Chang
630 Gravatt Drive, Berkeley 94705

FEMA
P.O. Bos 72379
Oakland, CA 94612-8579

Re: Support of EIS for East Bay Hills

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel
That they have been studied long enough. I believe the EIS findings of improved fire
Safety and likely long-term enhancement to the land should move forward without delay.
We Claremont Canyon residents know only too well that, when ignited, the eucalyptus
Canopy will spread wildfire dramatically during our windy fire season. With removal of
Invasive trees and yearly follow-up to discourage re-growth and weds, native
Vegetation will thrive.

Thank you for supporting this important work. Please approve the EIS as soon as
Possible.

Sincerely,
Shyan Chang

From: Veronika Cole
To: EBH-EIS-FEMA-RIX
Subject: Stop Plan to Clear Cut East Bay Hills
Date: Wednesday, May 15, 2013 9:51:06 PM

Hello,

I just learned of the plan to conduct massive tree removal and the application of herbicide in the East Bay Hills. This is a destructive plan, which will result in blight and loss of habitat. I oppose the use of herbicides, which may have unknown effects to flora and fauna. I am a heavy user of the trails throughout the East Bay Regional Parks and hills, the presence of forest is an essential part of quality of life in the East Bay. Please disapprove the current tree removal plan.

-Veronika

From: Howard Matis
To: EBH-EIS-FEMA-RIX
Subject: Please ignore the biased petition by the Hills Conservation Network
Date: Wednesday, May 15, 2013 7:52:21 PM

The Hills Conservation Network will be presenting a petition to you. The petition is completely biased. Comments supporting the FEMA EIS have been suppressed. I know this to be a fact. I made a tasteful comment. The comment was deleted by a moderator.

Therefore, the petition does not represent a true sample of community opinion.

Howard Matis

From: linda harris
To: EBH-EIS-FEMA-RIX
Subject: EIS and Wildfire Hazard Mitigation Projects
Date: Wednesday, May 15, 2013 6:58:58 PM
Attachments: FEMA letterwildfire hazard projects

Attached is a letter supporting the approval of the EIS for East Bay Hills Wildfire Hazard Mitigation.

Thank you for your attention.

Linda Harris

Linda Harris
37 Hiller Drive
Oakland, California 94618

Sent via email:
EBH-EIS-FEMA-RIX@fema.dhs.gov

FEMA
PO Box 72379
Oakland, CA 94612-8579

Dear FEMA,

As a resident of Hiller Drive in the Oakland Hills I strongly support wildfire hazard mitigation projects for the East Bay Hills. The Claremont Canyon Conservancy has worked tirelessly as a community based group to return segments of the hills to natural vegetation and reduce the eucalyptus fuel that was so disastrous in the 1991 Oakland Hills Fire.

The wildfire hazard mitigation projects have been studied long enough and now you can clear the path to begin the important work that remains.. Please approve the EIS , as is , without further delay.

Sincerely,

Linda Harris

Linda Harris

From: karen meryash
To: EBH-EIS-FEMA-RIX
Subject: Re: Support of EIS for East Bay Hills
Date: Wednesday, May 15, 2013 6:51:14 PM

Dear FEMA,
We are facing yet another early fire season in the East Bay Hills.
It is imperative that we remove as many invasive, non-native trees
as possible to help prevent the explosive tinder of the former fires and
allow the native vegetation to have a chance to regenerate. We are supportive
of the fire hazard mitigation projects and believe that the EIS findings should move
forward immediately. We are residents of the Claremont Canyon and support the
removal of the Eucalyptus that provides the ignition for wildfire spread.

We appreciate your support for this work and hope that it can be acted upon
as soon as possible as we are constantly under threat of another devastating
fire. Please approve the EIS as soon as possible.

Sincerely,
Karen and Michael Meryash
200 Stonewall Rd
Berkeley, Ca

From: Patricia A Schwartz
To: EBH-EIS-FEMA-RIX
Subject: Fwd: [NH OpenForum] Fear
Date: Wednesday, May 15, 2013 5:38:46 PM

My comments.

Patricia
Hiller Highlands

---------- Forwarded message ----------
From: **Howard Matis** <hsmatis@gmail.com>
Date: Wed, May 15, 2013 at 5:09 PM
Subject: Re: [NH OpenForum] Fear
To: Patricia A Schwartz <patschwartz11@gmail.com>

Patricia,

Thank you for the comments. Please send your comments to FEMA.

Howard

On May 15, 2013, at 7:52 PM, Patricia A Schwartz <patschwartz11@gmail.com> wrote:

> My husband and I did survive the 1991 Fire and rebuilt afterwards.
> I am very much aware of the danger of Eucalyptus trees and I agree with all
> that Katherine stated; plus, they are also brittle and tend to fall.
> Take FEMA's help, get rid of these fire hazards, and get the county and/or
> UC to replant with redwoods. It wasn't grasslands up in Tilden, it was
> redwoods.
>
> Patricia
>
> On Wed, May 15, 2013 at 2:38 PM, Katherine Gavzy
<kathgavnhp@comcast.net>wrote:
>
>> We were not here during the fire but I know a little about trees.
>> Eucalyptus is : 1. NOT a native (comes from Australia); 2. Both dangerous
>> and unsightly, and a nuisance for those who live near them, due to the
>> leaves, nuts, branches and other litter that drops and blows all around -
>> the leaves also prevent other plants from thriving; 3. Very difficult to
>> control; and of course 4. Fire-risky due to the oils. Native California
>> redwoods are 1. much less dangerous so long as you trim up the lowest
>> branches; 2. Not messy; 3. Extremely fast growing, so replacing a stand
>> of
>> Eucalyptus with a stand of redwoods will result in a nice green grove in
>> just a few years.
>> I think all told this is a no-brainer.
>> Katherine
>>

>> -----Original Message-----
>> From: openforum-bounces@northhillscommunity.org
>> [mailto:openforum-bounces@northhillscommunity.org] On Behalf Of Gerry
>> Keenan
>> Sent: Tuesday, May 14, 2013 12:15 PM
>> To: Open Forum
>> Subject: [NH OpenForum] Fear
>>
>> David and other hill community folks...I'm wondering if everyone involved
>> in
>> the chain of email regarding the EIR eucalyptus debacle lost their homes
>> (others lost their lives) in the 1991 fire. While not condoning name
>> calling
>> what I hear from Howard is fear...fear of another catastrophic fire, fear
>> of
>> perhaps not getting out this time, fear of having to start over again. I
>> know that I'm not alone when the smell of smoke or the sound of fire
>> engines
>> starts my hear racing and I once again wonder if living up here is not
>> worth
>> the annual fear of fire and loss. Howard does make some valid points. The
>> primary one is that it has been a very small group (8-10) of people, some
>> who did loose their homes and loved ones in the fire, who have been
>> effective in holding up money available for clearing eucalyptus for the
>> past
>> several years.
>>
>> I encourage those of you who wonder what the area will look like without
>> the
>> eucs to take a look at the wonderful natural progression of native plants
>> in
>> already cleared areas of Claremont Canyon. Soon after the fire we had an
>> abundance of raptors...the reason...clear line of site to prey, open areas
>> to swoop where wings wouldn't get snagged in trees, plentiful prey.
>> Effective use of herbicides applied directly to tree stumps does very
>> little
>> damage to the ground water system and with the exception of a very small
>> population dependent of eucs other fauna living in the trees will find
>> homes
>> in close proximity to the cleared area. And yes, the area will look barren
>> for a few years to come....when the present is all that matters the future
>> takes short shrift.
>>
>> Your neighbor, Gerry
>>
>> _____
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>>
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>
> For Crime Mapping, please visit: http://www.northhillscommunity.org/index.php?page=emergency#crimemaps
>
> For suggested email standards, please visit: http://www.northhillscommunity.org/index.php?page=openforum#tips

From: a n
To: EBH-EIS-FEMA-RIX
Subject: Strongly in favor of cutting eucalyptus, but plant replacements
Date: Wednesday, May 15, 2013 5:17:19 PM

To whom it may concern,

Unlike the Hills Conservation Network, I'm very strongly in favor of replacing eucalyptus and acacia with native trees, but the way this has been done is providing fuel to enemies of this plan, not to mention fires.

You have to allocate enough resources to replant the areas affected with oak, bay and redwood, not just cut and chip the eucalyptus. It will be great when giant stands of redwood return to the east bay hills, and when chanterelles and oaks can return to areas now overgrown with very competitive non-natives, but it won't happen without substantial help and proper planning.

Andrew Nimmo
2334 Curtis Street Apt 2
Berkeley, CA

From: H & M Lancaster
To: EBH-EIS-FEMA-RIX
Subject: FEMA grant to Oakland,EBRPD, and UCB
Date: Wednesday, May 15, 2013 4:52:22 PM

I am writing in support of the proposal to eliminate much of the non-native vegetation which is such a terrible fire threat to our East Bay neighborhoods. I was here during the terrifying 1991 fire. My late husband and I had purchased our house on Snake Road (the only house I've ever owned) three years earlier, and I was sure I was going to see it go up in flames. We were among the lucky ones who miraculously escaped the conflagration. The fuel load in these hills is worrisome to those of us who who have seen how dangerous it is. I hope everything possible will be done to safeguard our homes and lives from the fire threat presented by these non-native plants and trees.
I have read the summary of the proposal and endorse the plans. My only concern is the mention of possibly spreading wood chips up to 24 inches high; would that not be a fire hazard in itself? The instructions from the Oakland Fire Department tell home owners, "wood chips must not be deeper than 6 inches (no piles)."
Thank you for the opportunity to comment.
Mary Lancaster

From: Sandra Bryson
To: EBH-EIS-FEMA-RIX
Subject: Environmental Impact Study- Berkeley, CA- cutting down trees
Date: Thursday, May 16, 2013 2:24:12 PM

I want to urge you to accept the EIS as is so that we can make our hills safer.

Thank you,

Sandra Bryson

--

Sandra Bryson, MFT
Individual, Couple and Family Psychotherapy
5655 College Ave., Suite 317E
Oakland, CA 94618
510.653.6353
www.sandrabryson.com
www.parentmindfully.com

Please keep in mind that email may not be a confidential or private means of communication.

From: Renata Polt
To: EBH-EIS-FEMA-RIX
Subject: East Bay eucalyptus trees
Date: Thursday, May 16, 2013 2:21:58 PM

Hello,

I strongly object to the plan to denude the East Bay (San Francisco Bay Area) hills of its eucalyptus trees.

Renata Polt Schmitt

From: Don Brown
To: EBH-EIS-FEMA-RIX
Subject: EIS in Tildon Park/ East Hills of Berkeley
Date: Thursday, May 16, 2013 2:09:20 PM

To whom it may concern:

I totally support the removal of eucalyptus trees in the east hills of Berkeley as proposed. Given the dry conditions this year, the sooner this project can be funded and get under way, the better.

Donald Brown
2821 Claremont Blvd.
Berkeley, CA 97405

From: Samantha Beardsley
To: EBH-EIS-FEMA-RIX
Subject: AGAINST East Bay Hills fire reduction plan
Date: Thursday, May 16, 2013 2:08:12 PM

Hello,

I recognize the need to reduce fire risk in the East Bay Hills. I have been a resident here for two years now and plan to stay for many more. However, one of my favorite aspects of the East Bay is the proximity to large tracts of mostly undisturbed forest. This fire reduction plan with severely impinge on that wonderful privilege, as well as introduce large volumes of toxic pesticides to the environment.

I would be much more in favor of a less aggressive plan that did not involve clear cutting tracts of the forests. There must be a happy medium, such as increasing fire prevention measures, increasing corridors between the forests and houses, or any number of other viable plans for preventing destructive fires. But the current plan is unforgivable and I hope to attend as many public meetings as possible to voice this concern.

Thanks,
Samantha Beardsley

Berkeley Citizen,
UC Berkeley Graduate Student
Dept. of Civil and Env. Engineering

From: Bill Walzer
To: EBH-EIS-FEMA-RIX
Subject: EIS on fire risk reduction activities
Date: Thursday, May 16, 2013 1:33:12 PM

• Hooray for removing the non-native Eucalyptus trees that poison the ground so natives cannot grow. In time the forest will again be a natural native grassland, scrub, and forest of coast live oak, California bay laurel, big-leaf maple, California buckeye, and California hazelnut.

Eucalyptus trees are an extreme fire danger that will be greatly diminished as they are cut down. I remember during the Hills fire seeing these trees quickly burn in a 100' tall flame spewing burning branches for blocks.

The forest will not be attractive for a few years but not nearly as ugly as when it burns, and it will burn to the ground. And burn much more destructively than a fire in native grassland/forest that belongs in our hills. A decade of inconvenience is worth it now for future centuries of natural beauty.

Bill Walzer
2907 Lorina Street
Berkeley, CA 94705

From: Cravens, Arlen -FS
To: EBH-EIS-FEMA-RIX
Subject: Re: East Bay Hills Public meeting -Saturday, May 18th
Date: Thursday, May 16, 2013 12:36:03 PM

Hi Joan, I am still planning to attend and support barring a disaster or significant event with bad outcomes.

Thanks, arlen

Arlen P. Cravens
Acting Deputy Director ??? Fire & Aviation Management
USDA Forest Service, Pacific Southwest Region
O: 707.562.8927??
C: 530.945.3699
E: acravens@fs.fed.us

From: EBH-EIS-FEMA-RIX [mailto:EBH-EIS-FEMA-RIX@fema.dhs.gov]
Sent: Thursday, May 16, 2013 06:57 PM
Cc: Flack, Joan <Joan.Flack@fema.dhs.gov>
Subject: East Bay Hills Public meeting -Saturday, May 18th

For your use, below are directions to the Saturday, May 18th Public Meeting for EBH-EIS to be held at the Claremont Middle School.
Address:

Claremont Middle School
(510) 654-7337
5750 College Avenue
Oakland, CA 94618

The meeting will begin at 10AM but please be prepared to arrive by 9:15/9:30 AM due to the need for all hands setup. This gymnasium is bare bones (very different from the Trudeau Center). We will be setting up the room as best as we can with poor acoustics. This is a team effort!

Parking: On Saturdays, parking is in the yard right in front of the gym. There is also street parking.

Public Transportation: Claremont Middle School is one block from the Rockridge BART Station along the Pittsburgh-BayPoint line). Other AC bus lines stop less than one block from the school including lines 49, 51A, and 51B. The school is also immediately off of Highway 24, on the border between Oakland Berkeley and within a mile of the hills.

http://www.bart.gov/stations/closest.aspx?address=Claremont%20Middle%20School%2c%205750%20College%20Ave%2c%20Oakland%2c%20CA&to-from=from&station=ROCK&err=od

If you have any questions, do not hesitate to call me.
Joan

Joan Flack
Pre-Disaster Mitigation Grants Program
DHS/FEMA Region IX
Office: 510-627-7023
Cell: 510-541-1552
Joan.Flack@fema.dhs.gov

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From: Renee Goldhammer
To: EBH-EIS-FEMA-RIX
Subject: Rid report
Date: Thursday, May 16, 2013 12:06:54 PM

I approve of the report and would like to see the eucs removed. I live in the Oakland Hills and this is very important to me
Sent from my iPhone

From: George Hochfield
To: EBH-EIS-FEMA-RIX
Subject: fire in the East Bay Hills
Date: Thursday, May 16, 2013 11:48:22 AM

To Ladies and Gentlemen of FEMA:

We write as residents of the East Bay Hills who live in near vicinity to the Claremont Canyon and who witnessed the terrible fire of 1991. We fear the threat of another such fire. Therefore we join with the Claremont Canyon Conservancy in urging approval of the Environmental Impact Statement concerning the East Bay Hills that was recently released. Prevention of a disaster is infinitely preferable to coping with one, and the Statement offers proposals for effective means of fire prevention so desperately needed in this area.

Mayflower Day Brandt
George Hochfield

789 Alvarado Rd.
Berkeley, CA 94705
Tel: 510 644-0730

From: Jared Allaway
To: EBH-EIS-FEMA-RIX
Subject: California
Date: Sunday, May 19, 2013 11:09:40 AM

Please do not clear cut, and pour Roundup to prevent re-growth in Bucolic Strawberry and Claremont Canyon.

Please Tell UC Berkeley to reconsider their decision to pour gallons of herbicide to prevent re-growth.

Thank you.
Jared Allaway
253-261-2125

UC Berkeley has applied for the grant to destroy the bucolic Strawberry and Claremont Canyon areas, claiming that the trees pose a fire hazard. The school has no plans to replant, and instead will cover 20% of the area in wood chips two feet deep. And it will pour between 700 and 1400 gallons of herbicide to prevent re-sprouting, including the highly toxic herbicide, Roundup. People are mobilizing against this outrageous proposal, which UC Berkeley has done its best to keep secret.

From: Cynthia Banks
To: EBH-EIS-FEMA-RIX
Subject: do not clear-cut!
Date: Sunday, May 19, 2013 11:08:36 AM

FEMA,

I am an Oakland resident. Do not clear-cut Berkeley and Oakland trees in Strawberry and Claremont Canyons!!! Clear-cutting 85,000 trees and applying Roundup will be a grave insult to our environment.

Sincerely,
Cynthia Banks
4757 Reinhardt Dr,
Oakland, CA

From: abjam77@gmail.com on behalf of Jamie Manley
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Fire Reduction EIS Comment
Date: Sunday, May 19, 2013 11:01:39 AM

To whom it may concern:

I am writing to urge FEMA to reconsider its East Bay Hills Fire Risk Reduction Plan. The current plan is objectionable for many reasons: the high levels of insecticides needed to prevent resprouting, the dubious efficacy of clear cutting for fire prevention, and the aesthetic impact of large-scale tree remove on the Easy Bay hills landscape. I urge FEMA to search for a less disruptive and dangerous plan for fire risk reduction in the East Bay hills.

Sincerely,

--

From: Gwen Sky
To: EBH-EIS-FEMA-RIX
Subject: replacing trees with wood chips?
Date: Sunday, May 19, 2013 11:01:32 AM

In regards to the news that over 1,060 acres of clearcut proposed in the East Bay, I spent part of my childhood in the SF Bay area, and I can't even imagine the hills without trees.

I would like to know how the conclusion was drawn that replacing living trees with wood chips would make the hills less fire-prone. I lived in Australia several years ago when there was a massive fire in the Canberra area which destroyed entire neighborhoods. While I was not a personal witness to this horrible event, I saw many news reports on television, both while the fire was occurring and also the aftermath of the fire. I know there were lives lost, but I do not remember how many. I noticed that many of the houses had been surrounded by yards which had wood chips spread all over them, and in this fire the wood chips were burning brightly, creating a glow that outlined the yards where they undoubtedly made matters worse and added to the damage that was done. It was obvious to anyone with eyes to see on these numerous news reports that the houses where wood chips were spread suffered far worse damage (many were utterly destroyed) than yards that did not have them. Granted, trees have fuel, some more than others, but wood chips also contain fuel, and some of the same fuel I might add, since the wood chips presumably come from trees.

Clear cutting in the east bay hills and replacing the vegetation en masse with wood chips may not even reduce the fire danger and it would cause such a visual blight on the hills that could not be reversed. The East Bay hills are beautiful and they should remain. The massive amounts of toxic herbicides that would be needed to prevent resprouting would be subject to run-off and this run-off would pollute lakes and streams, some of which are used for some of the cities water supplies in the area. This plan is so dangerous in so many ways it is hard to contemplate that it is even a serious effort to reduce fire danger.

Please do not clearcut this area. There are other solutions. Please make use of them.

Thank you for your time.
Gwendolyn Sky
Cave Junction, Oregon.

From: Marielle Matthews
To: EBH-EIS-FEMA-RIX
Subject: Clear cutting Berkley/Oakland
Date: Sunday, May 19, 2013 10:58:18 AM
Attachments: wlEmoticon-smile[1].png

I'm up here in Chico and I DO NOT approve of what you are planning on doing to our local communities. Not only does it effect members of Berkley and Oakland, the rest of the world will feel the damage of taking down trees and spraying toxic chemicals over the land. Those chemicals cause more harm than good. Long term, they cause damaging effects. Please do not clear cut trees and spray environmental hazards. Find a more ecological way to clean up the area. Maybe volunteers, fire crews, inmate crews, boys scouts?! Anything but clear cutting and poisoning. When are ideas like this going to be considered heinous and selfish?? Knock this crap off!! Thank you Attached is a link providing over 100 peer reviewed studies of how glyphosphate is linked to hundreds of cancers, diseases and illnesses. Please care....what would your mother think?? This involves your family too....

http://www.greenmedinfo.com/toxic-ingredient/roundup-herbicide

Marielle Matthews
(Mother, Gardener, Student, Surgical Support Services for local hospital, Avid Thinker)
Chico, CA

From: camilla wellton
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project
Date: Sunday, May 19, 2013 10:36:35 AM

Hi

I strongly suggest that you leave those trees alone and instead reduce the future risk of succumbing to the mental fire (or similar) which must have moved you to make such clearly inane and insane project proposal.
Try reducing intake of junk food (as hackers say Junk in, Junk out), more sport and occasional awareness cultivating activities like fokused deep breathing, meditation or just hugging a tree

I hope you recover your santity in time before ther 17th of June

Be well
Camilla Wellton

From: John Diffenderfer
To: EBH-EIS-FEMA-RIX
Subject: Deforestration
Date: Sunday, May 19, 2013 10:30:55 AM

Does the Dpt of Wildlfe have any input to the desecration and loss of wildlife in this bizarre program?

Roxanne Dober

From: Michele Z
To: EBH-EIS-FEMA-RIX
Subject: cutting trees
Date: Sunday, May 19, 2013 10:17:42 AM

I read of FEMA's plans to clear cut 22,000 trees in Berkeley's historic Strawberry and Claremont Canyons and over 60,000 more in Oakland.

I strongly disagree.

My daughter would like to attend college there. She has asthma. What you are planning to do will make the air quality much worse. She also has some environmental sensitivities to chemicals like Roundup. Apparently pouring chemicals on the former site of TREES is also the plan. You're basically making the environment not only useless but dangerous to human beings and other living things.

Bad plan. Will not be popular. Stop.

Michele Zollars,
concerned citizen of California.

From: Stephen Solnit
To: EBH-EIS-FEMA-RIX
Subject: Comments on EIS
Date: Sunday, May 19, 2013 10:00:18 AM

To Whom It May Concern:

I strongly support the plan to remove the non-native trees in the East Bay Hills to reduce the risk of fire and promote the restoration of native habitat. The East Bay Hills are scarred by decades of over grazing, the encroachment of non-native plants and development. The non-native trees, especially Eucalyptus, are destructive of our ecosystems. They choke out not only the native trees, but all the other plants and animals that depend on them. The carefully planned removal of these trees will be a huge step forward in restoring our native flora and fauna.

I urge that you work to minimize the negative impacts such as erosion and the use of herbicides, and that you do as much as possible to restore the native plant community.

I moved to Berkeley in 1980 to attend UCB. I am now a homeowner in the Berkeley flats, and regularly use our hills for bike riding, hiking, and visits to the many wonderful recreational areas of Tilden with my children.

Sincerely,

Stephen Solnit
2905 Deakin St.
Berkeley, CA 94705
ssolnit@lmi.net

From: Stephen Solnit
To: EBH-EIS-FEMA-RIX
Subject: Comments on EIS
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Sincerely,

Stephen Solnit
2905 Deakin St.
Berkeley, CA 94705
ssolnit@lmi.net

From: Micky
To: EBH-EIS-FEMA-RIX
Subject: Hazardous Fire Risk Reduction Projects in East Bay Hills
Date: Sunday, May 19, 2013 9:51:43 AM

To whom it may concern:

I am writing you today to express my concern about the East Bay Hills hazardous fire risk reduction project. I am currently serving in the military and once I am out my husband and I plan to settle and live in California, specifically in/near the effected area. One major reason we have chosen CA as our ending place of residence is it's concern for the environment and protection of our natural resources.

The justification for this project seems unreasonable (15 fires over a 100 year time span) in comparison to the ecological damage that could potentially be done by this project. Not to mention the impacts of the use of herbicide covering that vast of an area.

I realize that in your proposal it said that the use of herbicide would be "minimized by mitigation measures and best management practices" and considerations have been taken for water contamination. However, what about the effects of the herbicide on residents, workers, native animals and insect populations?

As a tax payer and a future resident of this area, I strongly oppose this project. It seems like a waste of government funds and a waste of valuable natural resources. If the project was solely in the interest of increasing native tree populations and included the replanting of native trees, perhaps this could be something I could support. However, for the reason of "fire hazard", this is something I must oppose.

Thank you for your consideration,

Micky Curtis

From: jlf0130@gmail.com
To: EBH-EIS-FEMA-RIX
Subject: Don"t cut down the trees
Date: Sunday, May 19, 2013 9:49:00 AM

Please do not cut down the Berkley trees, or the Oakland trees, or any trees for that matter!!!

Nature is beautiful.

Sent from my iPhone

From: clintonraycurtis@aol.com
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project.
Date: Sunday, May 19, 2013 9:45:08 AM

To whom it may concern:

I am writing you today to express my concern about the East Bay Hills hazardous fire risk reduction project. My spouse is currently serving in the military and once she is out we plan to settle and live in California, specifically in/near the effected area. One major reason we have chosen CA as our ending place of residence is it's concern for the environment and protection of our natural resources.

The justification for this project seems unreasonable (15 fires over a 100 year time span) in comparison to the ecological damage that could potentially be done by this project. Not to mention the impacts of the use of herbicide covering that vast of an area.

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As a tax payer and a future resident of this area, I strongly oppose this project. It seems like a waste of government funds and a waste of valuable natural resources. If the project was solely in the interest of increasing native tree populations and included the replanting of native trees, perhaps this could be something I could support. However, for the reason of "fire hazard", this is something I must oppose.

Thank you for your consideration,

Clinton Curtis

From: michele horton
To: EBH-EIS-FEMA-RIX
Subject: clear cutting Berkeley trees
Date: Sunday, May 19, 2013 9:39:58 AM

You are going to clear cut this beautiful place where people go and enjoy these trees, of course during which school is out of session so no one can protest your assault. And then you will spray round up on the land to make sure nothing sprouts again. You have money for this yet you have no money for public education, head start, and other public important matters, like libraries, and jobs.

Sounds like you cut a back deal with Monsanto and the other herbicide corporations. I think this is outrageous. You are worried about fires. Then you can cut some of the trees to make room for the ones you leave. If you knew anything about fire prevention that is what is done, not clear cutting the whole of it, then what, floods, sink holes. You think the land is going to just do nothing after you do this to it. Doubt it. It's the stupidest idea I have heard of.

I live in Oregon, and our trees are more precious to us than money. Without our trees our Oregon wouldn't be what it is today. If we didn't have environmentalist to protect forests we would not even see a Redwood Tree, or Sequoia Tree.

Thank you for reading my comments, I hope you will reconsider.

Michele Horton

From: Ilene Philipson
To: EBH-EIS-FEMA-RIX
Subject: Subscribe
Date: Sunday, May 19, 2013 9:30:47 AM

Please subscribe me to your email list. Thank you, Ilene Philipson

--
Ilene Philipson, PhD, PhD, PsyD
Clinical Psychology, Sociology, Psychoanalysis

From: James Daly
To: EBH-EIS-FEMA-RIX
Subject: Opposition to clear cutting of trees
Date: Sunday, May 19, 2013 9:18:56 AM

I read about your plans to eliminate more than 80,000 trees in Oakland's Strawberry and Claremont Canyons, and want to express my opposition to it. I feel that the 'solution' is worse than the problem, especially the addition of so much herbicide into this area. Please reconsider this plan. It will leave a scar that will last generations.

Jim Daly

From: james brightbill
To: EBH-EIS-FEMA-RIX
Subject: "fire hazards"
Date: Sunday, May 19, 2013 9:15:06 AM

---

its an outrage you wanna destroy the strawberry and claremont canyon regions, not only are you cutting down natural habitats but you also wanna pour thousands of gallons of the chemicals, nuerotoxins, and essentially poison found in ROUNDUP, history will look upon you in shame, and we the people will fight to stop this from happening, your vail of secrecy will be removed, students will find out even though meetings and heatings are cleveroy planned around their absence. you should be ashamed of yourselves.

From: Meghann Riepenhoff
To: EBH-EIS-FEMA-RIX
Subject: concern about use of Roundup
Date: Sunday, May 19, 2013 9:03:03 AM

To whom it may concern:

After researching the plans outlined at http://ebheis.cdmims.com/Home.aspx and reading http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees, I am concerned about the potential use of Roundup and about the number of trees scheduled to be cut. I strongly oppose using herbicides such as Roundup, as they are extremely damaging to the land and have long-term ramifications. I oppose cutting an excessive number of trees for fire prevention, and voice support for finding other solutions for fire control.

Best,
Meghann Riepenhoff
www.meghannriepenhoff.com

From: b lindsay
To: EBH-EIS-FEMA-RIX
Subject: FEMA"a plan for clear-cutting "dangerous" trees
Date: Sunday, May 19, 2013 8:52:39 AM

I am appalled about FEMA'a plan for clear-cutting "dangerous" trees in the canyon areas, but the worst part is the herbicide! It is truly unbelievable that one would think that this would be a good plan. And, by the way, wood chips are highly flammable.

B Lindsay
--
In God we trust!

From: Eleanor Cyrce
To: EBH-EIS-FEMA-RIX
Subject: ebh-eis-fema-rix@fema.dhs.gov- my email to them was returned and failed
Date: Sunday, May 19, 2013 8:02:23 AM

From: Barbara Beth
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Fire Risk Reduction Plan
Date: Sunday, May 19, 2013 7:50:57 AM

Regarding: East Bay Hills Fire Risk Reduction Plan

Hello,

I am writing to you to again. I have a better understanding of your plan and agree that non-native tree species should be replaced with native species. And I truly hope you replant with native tree species.

However, the use of toxic herbicides is extremely harmful to the species living in these areas. Toxic herbicides will pollute the soil; rivers, streams and ground water; spread through the air and runnoff. It will also negatively affect long-term soil nutrient and microbe levels. The use of toxic herbicides may be the easy way to prevent reprouting but is the most toxic harmful way. Rather than spend the money on this method, please use other sustainable non-toxic methods. One traditional method, removing reprouts by hand, will also help provide jobs. I would rather my tax dollars go to this method than polluting the forests with toxic herbicides.

Thank you,

Barbara Beth

From: laura costas
To: EBH-EIS-FEMA-RIX
Subject: EBRPD project
Date: Sunday, May 19, 2013 7:43:41 AM

Please! No glyphosphates on public land!!

If you must cut the forest please do it such that no herbicides are needed!

Also, native bees are impacted by the use of both herbicides and deep mulch. Your fire mitigation project can be useful only if it doesn't involve the pyrric use of thousands of gallons of toxic herbicides and the wholesale loss of habitat for native pollinators!

Public funds should not be used to toxify the environment and wipe out habitat no matter what the putative other benefits might be.

Laura Costas

laura costas
R3dbudtree@verizon.net

From: David Hoes
To: EBH-EIS-FEMA-RIX
Subject: Disgraceful
Date: Sunday, May 19, 2013 7:09:43 AM

Your plans to cut down these trees is wasteful and idiotic. Yes, they pose a fire hazard. So does all vegetation everywhere, Why not clear-cut the entire nation? Then we will have no fires anywhere.

Trees are an essential component in fighting global warming as they absorb CO2 and reduce temperatures. It is like infecting a patient with smallpox to prevent them from contracting cowpox. I know you will likely ignore public opinion, but I strongly urge you not to proceed with this foolish plan.

David Hoes
LaBelle, Florida.

From: Marvin Canada
To: EBH-EIS-FEMA-RIX
Subject: destroying the environment
Date: Sunday, May 19, 2013 7:07:35 AM

The Berkeley project should not be done !

--
life is good ..... most of the time

From: diane holmes
To: EBH-EIS-FEMA-RIX
Subject: Clear-cutting of Claremont and Strawberry Canyons - Bad Idea
Date: Sunday, May 19, 2013 6:54:09 AM

The proposal to remove thousands of mature trees and replace them with chemically-soaked dirt and wood chips does not make any sense, even on the purported "fire hazard" level. Stop this immediately. Thank you.

--diane holmes

From: Sahari
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyon
Date: Sunday, May 19, 2013 1:43:15 AM

Have you lost your minds?
Have we learned nothing about living in harmony with Earth?
You think you can control outcome by human power, disregarding the living Earth?
Stop the insanity!
Why not just cut off all our appendages because they may get banged up or diseased during life?
Have you nothing better to do?
And do you really believe there will be no repercussions from this atrocious act?

Sahari
Howey in the Hills, FL

--

From: barbara lyon
To: EBH-EIS-FEMA-RIX
Subject: Berkeley and Oakland tree clear cutting plan
Date: Sunday, May 19, 2013 12:18:14 AM

Cease and desist in your plan. I can't believe you would be so stupid to do this. We all know what herbicides do to the land and all of its inhabitants and flora and fauna. What are you thinking???!!! There is no reason for this to be undertaken. I live in an area that suffered 4 wildfires in less than 2 years and we all survived. If that area did have a wildfire, you would be better protected by all those trees than without. Woodchips are toxic and if they caught on fire the fumes would be deadly. I have camped at Strawberry. I love those areas. Do not destroy that which does not need to be destroyed. Your plan is clearly not human.

From: Cecily Graburn
To: EBH-EIS-FEMA-RIX
Subject: no clearcutting in Strawberry Canyon
Date: Saturday, May 18, 2013 12:31:28 PM

Please do not cut down the trees in Strawberry Canyon!! This is where I grew up and I go by there often and marvel at and enjoy these trees!! Not to mention it being the habitat for so many animals. Please reconsider this move.

Thank you,

Cecily Graburn

From: Becky Mackelprang
To: EBH-EIS-FEMA-RIX
Subject: Statement of Opposition to East Bay Hills EIS for Hazardous Fire Risk Reduction
Date: Saturday, May 18, 2013 12:29:45 PM

To whom it may concern,

As a resident of Berkeley, I am highly disturbed to hear about the East Bay Hills EIS for Hazardous Fire Risk Reduction proposal. This natural area and the trees in it are vital to the beauty and health of the Bay Area. I understand there is a risk for fire. I would rather see the money going towards community education on fire safety and into the budget of our local firefighters. These trees are old and beautiful - if natural causes have not caused them to burn yet, then it seems the risk is low. If we educate our community on taking care of the beauty around us, instead of destroying it, we can decrease risk of man-made fires also.
As an avid runner, hiker, and lover of the Bay Area, I strongly oppose this proposal.

Sincereley,
Rebecca Mackelprang
Female, 24, UC Berkeley Graduate Student

From: Margaret Jordan
To: EBH-EIS-FEMA-RIX
Subject: Subscribe
Date: Saturday, May 18, 2013 12:28:38 PM

Thank you, Margaret Jordan, President, Point Richmond Neighborhood Council (area includes Miller-Knox Park in Richmond).

From: David Greenstone
To: EBH-EIS-FEMA-RIX
Subject: Don"t cut Strawberry Creek Canyon
Date: Saturday, May 18, 2013 12:18:55 PM

Yes, trees can burn, but destroying one of the few natural habitats left in Berkeley is not the answer. We must balance fire risks with the risks of destroying our natural spaces and pouring herbicides into our waterways. This plan is so short sighted. Why not just pave our whole city? There are other considerations when planning a city besides and beyond fire prevention. How about brush clearance? How about accepting that we all face risks to our life every day? Just getting in your car is a huge risk, yet we do not ban cars. Don't ban trees. Berkeley needs trees.

Althaea

From: Jessica Bowman
To: EBH-EIS-FEMA-RIX
Subject: 22,000 trees destroyed in Berkeley ?
Date: Saturday, May 18, 2013 12:15:05 PM

Absolutely not acceptable ! And spraying round up to kill any regrowth? I am sure you understand the hazards of this? Absolutely opposed and will protest and make this very public. Stop the insane killing of us. We need trees to live. And we do not need any more cancer causing agents spread, in replace of the oxygen givers.
Sent from my iPhone

From: Naya Peterson
To: EBH-EIS-FEMA-RIX
Subject: Please don"t clear cut our trees
Date: Saturday, May 18, 2013 12:01:26 PM

As someone who enjoys walking through Strawberry Canyon on a regular basis, I plead with you not to clear cut the trees. The idea of of the forest turning into a barren wasteland filled with chemicals is horrible.

Thank you,
Naya Peterson

From: Chelsea Loveall
To: EBH-EIS-FEMA-RIX
Subject: OPPOSE: EBRPD Wildfire Hazard Reduction and Resource Management Plan
Date: Saturday, May 18, 2013 12:00:50 PM

As an Oakland resident, I strongly oppose the clear-cutting of 25,000 trees in Berkeley and 60,000 more in Oakland. This project is a irresponsible and inappropriate use of our government's limited resources. After reviewing the project, it is clear this project will not achieve its stated objectives but rather increases the risk to the environment and the public.

I strongly urge you to retract or revise this project,
Chelsea Loveall
3980 Altamont Ave
Oakland, CA 94605
chelsealoveall@me.com

Stop the deforestation of the Berkeley/Oakland Hills
By Dan Grassetti, Hills Conservation Network

The current Draft EIS is unacceptable as it will inflict enormous environmental damage, expose the public to thousands of gallons of toxic herbicide, destroy raptor habitats, destabilize steep slopes, and actually increase the risk of hazardous wildfires.

FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing more than 50,000 trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen.

Reference: http://petitions.moveon.org/sign/stop-the-deforestation-3?source=c.em.mt&r_by=7738825

Million Trees' assessment of these projects

* These projects are more likely to increase the risk of wildfires than to reduce that risk.
  By distributing tons of dead wood onto bare ground
  By eliminating shade and fog drip which moistens the forest floor, making ignition more likely
  By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California
  By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will damage the environment by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby

contributing to climate change.

* These projects will endanger the public by dousing our public lands with thousands of gallons of toxic herbicides.

* Erosion is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* Non-native vegetation such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* Prescribed burns will pollute the air and contribute to the risk of wildfire, endangering lives and property.

* These projects are an inappropriate use of the limited resources of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

Reference: http://milliontrees.me/2013/05/09/nearly-a-half-million-trees-will-be-destroyed-if-these-east-bay-projects-are-approved-revised/

From: Nadja Lazansky
To: EBH-EIS-FEMA-RIX
Subject: Berkeley trees and scrub
Date: Saturday, May 18, 2013 11:59:32 AM

I just heard about UC's idea to clear-cut acres of wild areas in the Berkeley and Oakland hills under the guise of managing a fire hazard. Not only is this a bad idea for the wildlife that remains in these hills that will have no shelter, it would be destroying what the remains of native habitats in the Bay Area. It's a bad idea also because pouring herbacide into the earth is an even worse idea!

This is just unbelievable!!! UC has not had a good idea in decades and this on one of the worse. UC hates plants and animals, and people!

I will fight to keep this from happening.

Nadja Lazansky

From: Nathan Bockelman
To: EBH-EIS-FEMA-RIX
Subject: A vote not to clearcut outside UC Berkeley
Date: Saturday, May 18, 2013 11:47:34 AM

Hello.
I am urging, to those who make these decisions, not to clear cut the area outside UC Berkeley, as is being propsed to do.
There are lots of possible 'fire dangers' in California (especially Southern California- where I live) and I dont think the solution is to cut down acres of trees.
Please concider this, and offer other possible solutions to this problem.

Thanks,

Nathan Bockelman

1920 Jones Ave
Los Angeles, CA 90032

From: Georgina nunez-larraz
To: EBH-EIS-FEMA-RIX
Subject: Cutting trees in Berkeley is a horrible mistake, they are not a fire hazard and protect the air supply and beauty of the SF Bay area, please stop this initiative.
Date: Saturday, May 18, 2013 11:44:41 AM

From: Laurey Greider
To: EBH-EIS-FEMA-RIX
Subject: toxic chemicals and ruining natural beauty of woods by clear cutting
Date: Saturday, May 18, 2013 11:29:49 AM

Incredible! Don't you know how toxic roundups? Don't you care? Why do you hate nature so much? You have some messed up need to control and conquer nature and beauty? Why do you hate trees? UC should not be allowed to own tree land if all they want to do is kill it! Shame on you!

From: Sarah Glasgow
To: EBH-EIS-FEMA-RIX
Subject: Subscribe
Date: Saturday, May 18, 2013 11:21:17 AM

From: Christopher Bernard
To: EBH-EIS-FEMA-RIX
Subject: Stop FEMA"s plans to cut down East Bay trees
Date: Saturday, May 18, 2013 11:19:49 AM

Dear FEMA,

I must strongly protest the proposals to cut down a very large number of trees as described on the following website:

http://ebheis.cdmims.com/Home.aspx

Sincerely yours,

Christopher Bernard
Writer / Editorial Consultant
Author of the novel *A Spy in the Ruins*
Co-editor of *Caveat Lector* (www.caveat-lector.org)
Website: http://redroom.com/member/christopher-bernard

From: Trista Bacchi
To: EBH-EIS-FEMA-RIX
Subject: Berkeley/ Oakland clear cutting
Date: Saturday, May 18, 2013 11:08:16 AM

I am extremely opposed to the clear cutting of all the trees in this proposed agenda. While wildfires can be devastating they are essential in new growth and new life. Cutting down these trees is an extreme measure that will not even solve the problem. Please do not go forward with this.

From: Ernesto Perez
To: EBH-EIS-FEMA-RIX
Cc: bbwitz@sonic.net; 1 Mariposa Azul
Subject: Stop the Berkeley/Oak Tree Slaughter!
Date: Saturday, May 18, 2013 10:56:50 AM

From: Hills Conservation Network
To: EBH-EIS-FEMA-RIX
Subject: 1,518 signers: Stop the deforestation of the Berkeley/Oakland Hills petition
Date: Saturday, May 18, 2013 10:50:31 AM

Dear FEMA,

I started a petition to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, the petition has 1,518 total signers.

You can email all petition signers by clicking here:
http://petitions.moveon.org/target_talkback.html?tt=tt-42455-custom-21317-20130601-ICAnn3

The petition states:

> "The current Draft EIS is unacceptable as it will inflict enormous environmental damage, expose the public to thousands of gallons of toxic herbicide, destroy raptor habitats, destabilize steep slopes, and actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing more than 50,000 trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

To download a PDF file of all your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=862355&target_type=custom&target_id=21317

Thank you.

--Hills Conservation Network

If you have any other questions, please email petitions@moveon.org.

The links to download the petition as a PDF and to respond to all of your constituents will remain available for the next 14 days.

This email was sent through MoveOn's petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=xH6bm7btHgt1XQnAc8fwEiBFQkgtRUlTLUZFTUEtUklYQGZlbWEuZGhzLmdvdg--&petition_id=42455.

From: Logan A
To: EBH-EIS-FEMA-RIX
Subject: Subscribe
Date: Saturday, May 18, 2013 10:46:10 AM

From: Hilary Lang Greenebaum
To: EBH-EIS-FEMA-RIX
Subject: clear cutting local trees using round up?
Date: Saturday, May 18, 2013 10:43:04 AM

Good morning,

I just learned of your proposed plan to clear cut trees in Oakland and Berkeley and then using Roundup. Surely this cannot be true? Please put my name on the NO list. While I understand the need for intelligent decisions and proactive behavior in lieu of fire danger, using thousands of gallons of roundup will harm our gorgeous environment. Surely there is a better way than clear cutting and poison?

I am spreading the word as best I can and am sorry this proposed action is not more transparent. Perhaps that is your intent? As local homeowner with one acre in the Oakland hills, I just learned about this TODAY.
Again put me down on the NO list.

Thank you,

Hilary Lang Greenebaum PhD
11271 Kerrigan Drive
Oakland, CA 94605

From: Steve Gifford
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Hazardous Fire Risk Reduction
Date: Saturday, May 18, 2013 10:41:48 AM

I applaud the agency on the move to assist with the removal of the non-native and highly flammable eucalyptus trees. These trees are destructive to the natural vegetation of the area, and have contributed greatly to the spread of fires.

I believe the opposition's concern for the environment is misguided, here. The true environmental choice is to remove the trees, in order for the natural vegetation to return and flourish. California will be a much more beautiful and safer place after the removal of these trees.

From: Kathy Horn
To: EBH-EIS-FEMA-RIX
Cc: Carl Linkhart
Date: Saturday, May 18, 2013 10:38:51 AM

We wish to state our opposition to the lack of time allowed for announcment of your plans, public hearings, clearcutting of the trees in Strawberry Canyon and beyond, and especially using this massive quantity of herbicides!!!! This is outrageous and inappropriate misuse of power. We lived one canyon away from the Oakland Hills Fire of '91. The Fire Chief gave permission for his f-fighters to go to a training excersize in Hayward instead of staying to monitor the "extinguished" small grass fire on Skyline. THAT is the reason for the fire's severity.

And no heads rolled.

Kathleen and Arthur Horn
5499 Sobrante Ave.
El Sobrante, Ca

From: Elizabeth van Patten
To: EBH-EIS-FEMA-RIX
Subject: Proceed with FEMA grant plan
Date: Saturday, May 18, 2013 10:34:59 AM

Do not let the vocal minority stall these projects any further at the risk of another major wildfire. The proposed hazardous fire risk reduction projects need to be completed. TheEIS shows they can be done while protecting environmental concerns. Finalize the EIS and allow the work to begin.

Norman and Elizabeth van Patten
109 Starview Court
Oakland, CA 94618-2326

From: Larisa Cummings
To: EBH-EIS-FEMA-RIX
Subject: East Bay hills proposed project
Date: Saturday, May 18, 2013 10:34:46 AM

Herbicides? You want to do the cheap & dirty? Cut and Spray? No! Thin the trees, manage them! I have read that your purposes will be defeated as scotch broom will abound, along with other unwanted plants that will dry as fire hazards. Native wildlife? Please, do not proceed with these plans.
Thank you,
Larisa Cummings

From: basscorsair@gmail.com on behalf of Lia Holland
To: EBH-EIS-FEMA-RIX
Subject: Please do not destroy Strawberry and Claremont Canyon
Date: Saturday, May 18, 2013 10:30:20 AM

As a Berkeley resident who enjoys the hiking and beauty of Strawberry and Claremont Canyons, I urge you not to cut down trees and remove some of the most beautiful parts of Berkeley.
Please find another, less pointlessly destructive project to get a grant for- the state of our educational system is a bigger local emergency than the forests that surround our city.

And the University students are a bigger fire hazard than the trees.

Thank you.

Lia Holland

From: Jenina Rodriguez
To: EBH-EIS-FEMA-RIX
Subject: Do not cut down more trees
Date: Saturday, May 18, 2013 10:24:50 AM

Especially when there is no plan to reinvent. Do your jobs and find another way to keep the public safe with some innovation. Natural habitats are hard enough to come by in this country!

Sincerely,
Jenina Rodriguez
Concerned American citizen

From: Don B Hennig
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyons, Berkley, CA
Date: Saturday, May 18, 2013 10:24:20 AM

Subject areas deforestation proposals on fire hazard prevention grounds seems like a misguided program.

The public input process regarding such activities is typically flawed and unfair to public interest and information in my experience.

I request multiple and extended opportunities for public information and response.

From available information, I am opposed to this proposal. The cutting of mature stands and wide application of herbicides seems to be very ill advised.

Don B. Hennig, PE
Gales Creek, Or.

From: bobguter
To: EBH-EIS-FEMA-RIX
Subject: Cutting 85,000 Berkeley and Oakland Trees
Date: Saturday, May 18, 2013 10:18:25 AM

The current Draft EIS will inflict enormous environmental damage, expose us to thousands of gallons of toxic herbicide, destroy habitats, destabilize steep slopes, and increase instead of reduce the risk of hazardous wildfires.

The EIS needs to support a less destructive strategy that will focus on a "species-neutral" approach, one that will minimize ground fuels and the fire ladder, Killing more than 50,000 trees and poisoning them for up to 10 years will have disastrous effects on a healthy ecosystem.

The planned use of herbicides is enough to make the plan suspect.

This is not an example of enlightened environmentalism and not the manner in which I want my tax dollars used.

Robert Guter

From: John Steigerwald,DC
To: EBH-EIS-FEMA-RIX
Subject: NO TREE CUTTING
Date: Saturday, May 18, 2013 10:12:39 AM

Leave the trees! NO cutting!!!

--
Best regards,

John Steigerwald

From: BB Borowitz
To: EBH-EIS-FEMA-RIX
Subject: stop the clearcut PLEASE
Date: Saturday, May 18, 2013 10:06:51 AM

---

please stop the plan to clear cut Oakland & Berkeley trees . . . we need our trees for air quality, beauty and ecosystem . . . please stop this plan!
thank you,
BB Borowitz

From: James Everett
To: EBH-EIS-FEMA-RIX
Subject: I support the East Bay fire reduction vegetation management plan
Date: Saturday, May 18, 2013 10:01:15 AM

Hi,

I understand you are accepting public comments on your proposed plan to reduce fire hazard in the canyons east of Berkeley and Oakland, CA, by removing invasive non-native tree species (Eucalyptus and Acacia). I strongly support this plan.

I know you will receive a lot of comments from very emotional but poorly-informed people, thinking that you are executing some evil plan to harm the environment. I just wanted to offer a different opinion, one based on a longer-term ecological perspective.

When I was in graduate school in the mid-1990's, I did some ecological research in the canyons east of Berkeley and surrounding towns (Strawberry Creek, Wildcat Canyon, Eldorado Creek, etc). I was studying native riparian vegetation, and thinking about how to better design riparian restoration projects. At the time, I became very concerned about the problem of non-native, invasive species in the "wild" landscapes of the East Bay: specifically, the Eucalyptus and Acacia. They pose a very significant fire hazard to surrounding communities, and they crowd out native vegetation and associated wildlife. I thought a fair amount about how you could restore the native landscapes.

I concluded that the best thing to do would be exactly what you are planning to do in this project: cut out the invasive non-native species, treat the stumps of Eucalyptus and Acacia with herbicide, and encourage the native vegetation to re-colonize from adjacent areas.

The only thing I would add to your project is the following: gather a large number of seedlings of Douglas-fir, Coast Redwood, native Pines, and California Nutmeg, and use volunteers to plant and nurture them – accelerating the re-establishment of the native forests which almost certainly had an important place in these landscapes before they were disturbed. These species will not readily re-establish themselves without assistance, as they have heavy seeds and are slower to establish than many other species. Doing so would also greatly help the public image of your project – right now, activists are trying to attack your project as anti-environment. If you had a pro-active restoration component such as a tree-planting program that the public could be involved in, you would redirect energy and accentuate the positive aspects of what you are doing. I would certainly offer my time.

Please don't listen to the alarmists and nay-sayers! This is an important project! I have been sincerely hoping something like this could happen for 20 years. I very very much hope the project goes forward.

Best regards, James Everett

James Everett, Partner

Aquillian Investments, LLC
275 Sacramento Street, 8th Floor / San Francisco, CA 94111
(415) 306-6963 Mobile
jeverett@aquillian.com / www.aquillian.com

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From: Steve Brudney
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project
Date: Saturday, May 18, 2013 9:59:29 AM

To FEMA:

I find it hard to believe that any city or government entity would move forward with the East Bay Hills Hazardous Fire Risk Reduction Project. It is unthinkable that a project of this magnitude and cost would be carried out during this time of a federal sequester that has already negatively impacted the quality of life and livelihoods and health of millions of Americans and threatens to continue doing so.

To consider the widespread use of Roundup and other herbicides, once the trees are gone, and by so doing, introduce a whole other threat is mind-boggling. How can you worry about the evil of invasive species yet you're willing to destroy all the native species in the area of the project. Your whole idea is to eradicate the threat to life and property by future firestorms but you're willing to substitute one threat for another. There will be negative human and environmental effects of cutting down tens of thousands of trees. You think that water can't run and erode under wood chips? You think there is no fire hazard in wood chips? A fire started years ago in the wood chip piles of the pulp mill on Humboldt Bay; it filled the air with smoke and injured the quality of air and people. Also, the Roundup and the other chemicals you plan to use could invade the water table. And it could kill species that keep down populations of undesirable animals. I hope an independent environmental impact study has been carried out and published.

You've lost the trust of many Berkeleyites and others by your underhanded scheduling of "three public meetings for mid and late May while UC Berkeley students were in finals or gone for the summer," as Randy Shaw wrote in the *California Progress Report.*

I suggest that the entire project is unnecessary: ground-clearing in order to remove fuel for possible wildfires would be almost as effect and an excellent compromise among interested parties.

I was born in Berkeley at Alta Bates Hospital and moved east when I was seven, growing up in Lafayette until I was nineteen. I returned to Berkeley countless times, spending some of the time in Tilden Park and Strawberry Canyon. I, along with thousands of East Bay and other citizens are aghast and outraged over the Project.

Thank you for your time and consideration,

Steve Brudney
538 Hiller Rd.
McKinleyville, CA 95519
(707 840-0876

From: John Newton
To: EBH-EIS-FEMA-RIX
Subject: RE: East Bay Hills hazardous fire risk reduction project
Date: Saturday, May 18, 2013 9:57:32 AM

Dear FEMA,

I am a long time Oakland and Berkeley resident. I went to Berkeley high school, where as part of an athletic club I regularly ran through Strawberry Canyon. I spent my youth hiking in the hills of Oakland and Berkeley, in the woods that you now propose to destroy without any intention of replacing this lost public resource.

How dare you even consider destroying these wooded areas. I strongly opose this "East Bay Hills hazardous fire risk reduction project." I will have further comment before the end of the comment period.

John A. Newton
johnavne@gmail.com
(510) 847-6523

From: Bradley Senner
To: EBH-EIS-FEMA-RIX
Subject: EIS
Date: Saturday, May 18, 2013 9:54:27 AM

Hello,
I wanted to voice my concern with the ridiculous intentions behind cutting now thousand of trees to lay down tan park. It is completely illogical to simply cut down trees to lower fire risk. It is similar to getting rid of a water source to lower the amount of mosquitos. It will lower the risk, but will also have greater aesthetic and environmental risks as a result. A massive field of tan bark is grossly ugly and going ahead with cutting the trees will reflect poorly on UC Berkley's image as a university. They will be connected to this action via publicity and it will negatively affect their unique reputation that their foster. The last problem with this plan is the ridiculous idea to use massive amounts of herbicide. Scientists do not even know how harmful this is and it has not been correctly tested at this large scope. Using herbicide on that scale will have terrible environmental repercussions and most likely, will not be contained in one area. It will become airborne with that many gallons and will be a health hazard to any people within a given radius of the fields. If it is lowering the risk of fire hazard that drives this project, there are other ways to accomplish this. The money can be spent on safeguarding the school with a perimiter and not simply taking away things that burn. Cutting down fields of trees is a crazy way of reducing fire risk. It works but is negative for so many obvious reasons. I am not an environmentalist but this is just a horribly unaesthetic for the university and will bring terrible publicity. Please reconsider. I would choose time and time again to go to a similar university that actually has trees and beautiful scenery as opposed to one that is concrete and has massive tan bark fields riddled with herbicide.
-Brad

From: Cari
To: EBH-EIS-FEMA-RIX
Subject: No tree cutting
Date: Saturday, May 18, 2013 9:53:32 AM

Please. This is our home and we should have a say!!!

Sent from my iPhone

From: julie lehman
To: EBH-EIS-FEMA-RIX
Subject: Claremont Canyon EIS
Date: Saturday, May 18, 2013 9:35:59 AM

Dear Sir,
Please approve the EIS as is and release the funds.
Thank you. Julie Lehman

--
Sincerely, Julie Lehman
Residential Real Estate Broker
Prudential CA Realty
www.JulieLehmanHomes.com
510.915.7207 Direct
510.845.2821 Fax

From: elise cumberland
To: EBH-EIS-FEMA-RIX
Subject: clear cut of trees in berkeley & oakland
Date: Saturday, May 18, 2013 9:27:44 AM

NO NO NO NO NO NO NO NO NO NO NO NO
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PLEEEEEEEASE DON'T DOOOO THISS!!!!!

--
****
music is how feelings sound
http://elisecumberland.weebly.com/
http://flowermusic.tumblr.com/

From: Azzia Walker
To: EBH-EIS-FEMA-RIX
Subject: Do not destroy the trees
Date: Saturday, May 18, 2013 9:19:04 AM

Animals live there! We all breathe the air and drink the water. Didn't you read the Lorax? Nix this plan!

Azzia

Azzia Walker
www.theazziawalker.com
510-776-4341
Sent from my iPad

From: Jeff Silberman
To: EBH-EIS-FEMA-RIX
Subject: Leave the Trees in Berkeley Alone!
Date: Saturday, May 18, 2013 9:17:32 AM

There is no reason for FEMA to spend money destroying these lovely trees.
They pose no risk.
And the US Gov't has no money to spend anyway.

Stop your plans.

Sincerely,
-Jeff Silberman
Former Berkeley Resident
Former UC Berkeley Graduate (1983)

From: ant6353@comcast.net
To: EBH-EIS-FEMA-RIX
Subject: One Opinion
Date: Saturday, May 18, 2013 9:06:39 AM

Please let FEMA do its planned work. We were destroyed in the 1991 fire, and it seems to me that the trees are all bigger than they were then. It is very hard to have a soft spot for a eucalyptus tree. They are Roman Candles just waiting to be ignited. Joan Anthony

From: Silvia G. Hughes
To: EBH-EIS-FEMA-RIX
Subject: Support of EIS for East Bay Hills
Date: Saturday, May 18, 2013 8:56:50 AM

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

Re: Support of EIS for East Bay Hills

Dear FEMA,

As a survivor of the 1991 Oakland Firestorm, I can personally attest to the destruction that Eucalyptus trees can cause. On our street alone, Contra Costa Road, we lost 97 out of 100 homes in that fire!
I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough.
I believe the EIS findings of improved fire safety and likely long-term improvements to the native landscape should move forward without delay.
We Rockridge Terrace residents know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season.
With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive.
Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,
Silvia G. Hughes
6333 Contra Costa Road
Oakland, CA 94618

Sent from my desktop (I don't own a smartphone, yet)
Silvia G. Hughes
silviahughes61@gmail.com
Land 510.420.1203
Cell 510.418.3741

From: Maryl Gearhart
To: EBH-EIS-FEMA-RIX
Subject: opposition
Date: Saturday, May 18, 2013 8:52:24 AM

To whom it may concern:

* These projects are more likely to **increase the risk of wildfires** than to reduce that risk.

By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will **damage the environment** by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will **endanger the public** by dousing our public lands with thousands of gallons of toxic herbicides.

* **Erosion** is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* **Non-native vegetation** such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* **Prescribed burns** will pollute the air and contribute to the risk of wildfire, endangering lives and property.

* These projects are an **inappropriate use of the limited resources** of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

Maryl Gearhart
Graduate School of Education
Tolman Hall 4413
University of California, Berkeley
Berkeley, CA 94720-1670
gearhart@berkeley.edu

From: Regi Teasley
To: EBH-EIS-FEMA-RIX
Subject: deforestation in Berkeley/Oakland area
Date: Saturday, May 18, 2013 8:51:24 AM

People,

Obviously there would be decreased fire danger if there were no trees, no buildings, no roads, no people, no lightening, etc. Short of that position, this plan is irrational.

This is certainly not the time to eliminate trees when they are needed to help with slowing the flow of rainwater, cooling the environment, absorbing carbon dioxide, creating habitat for species that are increasingly under stress and beautifying the area.

Please awaken from your daydreams of "security" and to the threats to the biosphere. A dead landscape is the farthest thing from a secure one. Get outdoors and perhaps your heads will clear.

Sincerely,

Regi Teasley, Ph.D.

Ithaca, NY

From: Maria Hess
To: EBH-EIS-FEMA-RIX
Subject: Do not cut or poison
Date: Saturday, May 18, 2013 8:49:35 AM

Do not clear cut trees in Berkeley or spread herbicide.
This decision is bad for nature, people and the overall environment.
Take the project back tot he drawing board. What can be gained by cutting these trees?
Please rethink your strategy for the benefit of everyone.
Sincerely,
Dr. Maria Hess

From: Ria
To: EBH-EIS-FEMA-RIX
Subject: Don"t take the trees!
Date: Saturday, May 18, 2013 8:48:25 AM

Dear FEMA,

I am appalled to read about your proposal to destroy so many trees in Strawberry Canyon, Claremont Canyon, and Oakland. These trees are part of the landscape that makes Oakland and Berkeley so special, and they provide a refuge for so many of us. It would be one thing if you were taking out the non-native eucalyptus trees and replanting vegetation native to California (this would be great!), but your plan to lay down woodchips and pesticide is destructive, dangerous, and will destroy the semi-natural beauty of these areas. Don't do it!

Sincerely,
Ria
Oakland, CA Resident

From: Allen Yip
To: EBH-EIS-FEMA-RIX
Subject: Plans to Clear-Cut 85,000 Berkeley and Oakland Trees
Date: Saturday, May 18, 2013 8:42:09 AM

I understand the need to reduce a fire hazard but why this all or nothing approach?

Would it be possible to thin out the overgrown areas and retain the natural surroundings?

Just a thought.

Allen Yip
Carmichael Training Systems Senior Coach
USAC Level 3 Coach
ayip@trainright.com
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From: Bryan Bibey
To: EBH-EIS-FEMA-RIX
Date: Saturday, May 18, 2013 8:40:51 AM

This is a disgrace to the preservation of natural resources! Stop this unnecessary act! Plus, adding insult to injury, you want to spray pesticides ie. toxic roundup? STOP the madness!

From: Paul Dattilo
To: EBH-EIS-FEMA-RIX
Subject: RE: Tree cutting proposal, Berkeley-Oakland
Date: Saturday, May 18, 2013 8:40:49 AM

I very strongly oppose the plan to chop down trees in Berkeley and Oakland and apply herbicide.

From: Jeano Snyder
To: EBH-EIS-FEMA-RIX
Subject: Cutting Trees
Date: Saturday, May 18, 2013 8:37:50 AM

Hello,
I want to express my protest on the clear cutting of 85,000 trees in Berkeley and Oakland, as well as, 22,000 trees in Strawberry and Claremont Canyon. These trees hold the hills together and are healthy for the environment and people. Without them will create other problems like erosion, water run-off problems, lack of oxygen producing trees, a loss of habitat for wildlife and loss of beauty.
These trees have been there for decades and hardly constitute a "hazard."To then put "Roundup", a highly toxic herbicide, to squelch the return of non-native vegetation, will be a hazard.
Please hear this voice of protest and concern over taking this action.
Perhaps to lessen the fire danger would be to spend the same time and money to clear the dead wood from the area and not destroy the whole tree in the process.
Thank you, Jean Snyder

From: Hanna
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyon proposed clear cutting
Date: Saturday, May 18, 2013 8:31:51 AM

To whom it may concern,

I would like to be very clear about my outrage concerning the draft EIS, which describes the proposed East Bay Hills hazardous fire risk reduction projects and potential environmental impacts on the natural, physical, and human environments in the project. I am in disbelief that you would even consider the option of cutting down all those beautiful trees and replacing them with highly toxic chemicals. As humans we need trees, and we need a healthy environment, not more toxic wasteland. I expect you to drop the proposal immediately and consider the health of the life in the area, including human.

Thank you,

Hanne Larsen
Pacifica, CA
hannetlarsen@yahoo.com

From: Meg and Neil Sullivan
To: EBH-EIS-FEMA-RIX
Subject: Comment re East Bay Hills EIS for Hazardous Fire Risk Reduction
Date: Saturday, May 18, 2013 8:17:46 AM

I am unable to attend today's meeting. Please consider the fact that clear-cutting the trees poses a huge risk of landslides. Also consider the fact that Round-up is a huge hazard to the health of the people of this area. This plan, as it stands now, is totally unacceptable.

Thank you,
Meg Sullivan
1223 61st Street
Oakland, CA 94608
510-428-0675

From: stephanie zappa
To: EBH-EIS-FEMA-RIX
Subject: clear- cutting
Date: Saturday, May 18, 2013 8:14:14 AM

To whom it concerns at FEMA:

I have seen evidence of this tree removal already and it concerns me GREATLY. I live in Montclair and as the planet heats up and our leaders do nothing, one of the very FEW ways in which we can purify the air (absorption of carbon monoxide, creation of oxygen) and even more simply provide any sort of cooling system, i.e., shade, this tree removal is both mystifying and dangerous.

In addition, I am greatly concerned that there has been no broad public announcement, with media coverage on many fronts and adequate time for people to weigh in and attend meetings. The way it appears, you wouldn't want that as it would interfere with what was clearly a fait d'compli.

Disturbed in Oakland,

Stephanie Zappa
94611

From: Δ Day Schildkret Δ
To: EBH-EIS-FEMA-RIX
Subject: Public citizen comment on FEMA"s plan to destroy trees in Strawberry Canyon
Date: Saturday, May 18, 2013 8:13:00 AM

5/18/2013
PUBLIC COMMENT:

As a citizen in the Bay Area and a teacher at Berkeley Midrasha, a supplementary Jewish High School at Temple Beth El, in Berkeley, I write to express myself as well as many concerned congregants, families and student's that I interact with and represent regarding the reckless proposed East Bay Hills hazardous fire risk reduction project.

We urge you to cease and desist from the draft EIS plan to cut 85,000 trees from Strawberry Canyon (as well as spraying herbicide on the land) and to choose another, more environmentally friendly plan that does not destroy life in order to save life.

These trees are our neighbors and friends and have the right to be protected. As a stakeholder and interested party in the East Bay, I speak directly to the representatives at FEMA and request you to propose another plan that does not harm our beautiful land, our trees, and does not put poison in the earth.

There MUST be more ideas and resources to work with than just clear cutting 85,000 trees. This is unacceptable and will not be tolerated.

Thank you for hearing my and my community's strong resistance to this plan.

Day Schildkret
Berkeley Midrasha Educator
917-570-3643

From: Karl Banks
To: EBH-EIS-FEMA-RIX
Subject: There are other ways to prevent wildfires
Date: Saturday, May 18, 2013 8:06:41 AM

I am OPPOSED to the proposed plan to clear-cut 85,000 beautiful Berkeley and Oakland trees, including 22,000 in historic Strawberry and Claremont Canyon.

Fire protection may be achieved with limited cutting, to create fire breaks, installation of water tanks in the hills specifically for fire fighting and through public education and increased vigilance.

The real danger lies in the underbrush which grows back first. A mature forest has less underbrush and thus, less fire danger. Clear cutting is a short term, short sighted, shortcut.

I VEHEMENTLY OPPOSE the proposed plan to use Roundup to prevent regrowth. We do not need to produce more of this poison and we definitely do not want that in our East Bay environment.

If fire prevention is the goal, spend the money to hire people who need jobs to physically remove the underbrush while leaving the trees to mature.

Karl Banks

From: Bryn Fraker
To: EBH-EIS-FEMA-RIX
Subject: Statement against the reduction of hazardous fire risk
Date: Saturday, May 18, 2013 7:50:13 AM

To whom it may concern,

Moving forward with the plan to remove 85000 trees from the strawberry and claremont canyons will prove far more harmful than the benefit of "reduced fire risk." Removing the trees and maintaining that removal with the use of toxic pesticides, will further pollute this urban area and decrease the quality of life for its residents. The benefit of a reduced risk of wildfire does not outweigh the price the citizens will pay with the health of their environment and their personal health if the proposed region is cleared.

I stand opposed to FEMAs proposed activities for the reduction of fire hazard in Alameda and Contra Costa Counties as outlined in the EIS.

Sincerely,
Bryn Fraker
California College of the Arts
5212 Broadway, Oakland

From: Eric Roudabush
To: EBH-EIS-FEMA-RIX
Subject: Opposed to the cutting of Oakland & Berkeley Trees
Date: Saturday, May 18, 2013 7:35:12 AM

Strawberry and Claremont Canyon area clear cutting has not had adequate public notification and response time.
Please don't do it.

-Eric Roudabush
Oakland Resident

From: Kathy Janeiro
To: EBH-EIS-FEMA-RIX
Subject: An assanine response
Date: Saturday, May 18, 2013 6:59:36 AM

Clear cutting trees in Strawberry Canyon will not only be an eyesore, it will devalue surrounding property, create different disaster potential of hillslides and lose precious wildlife habit. Extreme responses are rarely solutions to longstanding problems. I strongly object to the approval of this grant. It could be thinned of diseased and dead trees, no need to over-react

Sent from my iPad

From: Al & Shelley DeMelo
To: EBH-EIS-FEMA-RIX
Subject: Trees
Date: Saturday, May 18, 2013 6:54:39 AM

Hello

Voicing my opinion this is criminal to do I just don't get it and you think this is good to do what is wrong with your thinking to cut down this many trees and say it is a fire hazard when But pouring 1400 gallons of herbicide on the currently pristine hills will create a real hazard, and UC Berkeley even plans to use the highly toxic herbicide "Roundup" to squelch the return of non-native vegetation. Give me a break and give some heads a shake what is this really about makes me sick to think this could happen. Have more love and compassion for the living and all the benefits that is from these trees.

--
Best regards,
Shelley mailto:as@ASDeMelo.com

From: Barbara Beth
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Fire Risk Reduction Plan
Date: Saturday, May 18, 2013 5:38:30 AM

Regarding: East Bay Hills Fire Risk Reduction Plan

Hello,

I am writing to you to ask that you NOT cut down the trees, which are ecosystems in the East Bay Hills behind Berkeley and Oakland. Cutting-down trees, especially tens of thousand of trees and using very harmful and toxic herbicides will destroy ecosystems that not only human populations in the Bay area enjoy but many species rely on. The toxic herbicides will pollute for a long time the environment, soil, water and air and also harm people and the species that live in the area.

Cutting down these trees to reduce the risk of fire hazard will create other hazards. Destruction of the environment, loss of habitat for species, reduced biodiversity, loss of recreation and nature for people, and also increase runnoff with highly toxic herbicides and increase soil and mud slides, polluted rivers, streams and ground water, also will lower property values, because of these associated risks.

Fire hazards are the least of our problems when you cut down and pollute with herbicides our local ecosystems. This is an impulsive, without thoroughly thinking this through, and paranoid act. There are other sustainable ways to protect surrounding communities from risk of fire without destroying and polluting the ecosystems that we all love and enjoy and share with other species.

Haven't we learned anything from past mistakes in this world. Look around and see what humanity has done to environments and the negative consequences of deforestation (loss of biodiversity, pollution, loss of oxygen supply and carbon sequestration that the trees produce, intense runnoff and slides, loss of soil richness, nutrients and microbes, polluted rivers and streams, etc.) This act is just insane, is wrong, and not healthy

for the environment and our communities.

Please do not commit this horrible act on our local ecosystems. This must be stopped. I plead with you to not do this. We are destroying environments everywhere, when will it end. Please don't cut down these trees in Berkeley and Oakland or anywhere in the Bay Area. Please stop this madness.

Barbara Beth
PO Box 191443,
San Francisco, CA
94119
510-717-4573

From: Hope Karan Gerecht
To: EBH-EIS-FEMA-RIX
Subject: Please, no herbicide, no tree removal
Date: Saturday, May 18, 2013 5:13:37 AM

I have MS due to herbicide! It is NOT a safe product! They chemicals from the adjacent farm have destroyed my life. And now you want to clear cut how many trees? Shame!

Hope Karan Gerecht
410-486-6086

From: Raleigh Latham
To: EBH-EIS-FEMA-RIX
Subject: DO NOT DESTROY OAKLAND"S FORESTS!
Date: Saturday, May 18, 2013 2:42:27 AM

I'm emailing against this horrible travesty to our community. I live in Oakland, and these trees (which might be clearcut) provide intense beauty, moisture, and wildlife. Cutting them down would be like condoning the murder of a child. This act is despicable, pouring more than 6000 gallons of herbicides onto our forest floor!? YOU SHOULD BE ASHAMED OF YOURSELF!
-Raleigh Latham (Oakland CA)

From: Chris Dunn
To: EBH-EIS-FEMA-RIX
Subject: Message in opposition to clear-cutting to reduce fire risk
Date: Saturday, May 18, 2013 2:32:11 AM

Greetings,

I am a voter and resident in Oakland, CA. I've just become aware of a possible plan to clear cut tens of thousands of trees and use dangerous herbicides such as Roundup to prevent regrowth all in the name of "public safety". While I support a moderate level of forest thinning to protect the public from wildfires, I strongly oppose the extreme approach of clear cutting and poisoning our precious urban forests. And while wildfires are a potential threat to public safety, the use of Roundup or other similar herbicides is a CERTAIN threat to public health and safety.

Please reject any plan to clear-cut and poison these areas. I urge you to work with all the communities and constituents that will be affected by this action to come up with a plan that balances the need to mitigate fire risk with a equally important needs to conserve forest and wildlife and protect the public from the potentially devastating impacts of the use of Roundup and similar herbicides.

Thank you for your time,

Chris Dunn
690 30th St. #3
Oakland, CA 94609

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From: Nara Denning
To: EBH-EIS-FEMA-RIX
Subject: re: clear cutting Oakland and Berkeley
Date: Saturday, May 18, 2013 2:09:40 AM

This is madness. What is going on over there?

Nara Denning

From: Samie Blasingame
To: EBH-EIS-FEMA-RIX
Subject: DONT CUT THE TREES!!
Date: Saturday, May 18, 2013 1:33:25 AM

Dear FEMA,

I am writing as a concerned Bay Area native. I have heard about your plan to cut nearly half a million trees in the oakland/berkeley area. I writing now to urge you to make the right choice by not letting those trees be cut.

SAVE THE TREES!!

sincerely,

Samie Blasingame

From: ron rotter
To: EBH-EIS-FEMA-RIX
Subject: comment for proposed FEMA EIS.
Date: Saturday, May 18, 2013 1:09:43 AM

Dear sir/madame,
I am a long-time resident and homeowner on panoramic hill. Ronald Rotter at 555 dwight place. I understand the need for fire safety, and the need to cut down any dead/dieing/dangerous/eucalyptus trees. however i strongly urge you not to chop down so many trees as i understand are being proposed; and especially strongly urge you not to use any fungicides like ROUND-UP. Their long-term effects have not been fully studied and could do serious long-term damage to plants and animals.

Thank you,
Ronald Rotter

From: ganesha32002@yahoo.com
To: EBH-EIS-FEMA-RIX
Subject: Oakland/Strawberry & Claremont Canyon Tree Destruction
Date: Saturday, May 18, 2013 12:49:55 AM

Dear Fema,

The planned destruction of thousands of trees along with the implementation of toxic herbicides throughout Oakland, Strawberry & Claremont Canyons as well as planned removals for the East Bay; are probably the most disgusting acts of terrorism upon our environment that
I can think of.

Our planet is all we have. Once it is destroyed, game over and I hate to be the one to tell the Emperor he's not wearing clothes but we are at a critical moment in time as we teeter on the brink of destruction and this is just another nail in our collective coffin!.

Without trees, we lose oxygen. Being that our ozone has been compromised to an enormous degree at the hands of greed and ignorance through global warming, we already suffer from a tremendous loss of oxygen; not to mention the amount of chemicals that are ruining the soil and in turn, run into our water systems to further erode our odds of survival upon this living organism Earth. Trees are alive; they breathe in what we breathe out; we are symbiotic life-partners; for every action there is a reaction; cause=effect!

How many are ignorant enough to cut off their own "nose"?

Wendi Morrison-Merritt
California State Tax Payer

From: amygorman@sbcglobal.net
To: EBH-EIS-FEMA-RIX
Subject: No Tree Cutting
Date: Saturday, May 18, 2013 12:39:31 AM

Please do not destroy the trees in Berkeley and Oakland without plan for re-planting and longer period for public input.
It is a senseless waste.

Thank you,
Dr George and Amy Gorman
Berkeley Ca

Sent from my iPhone

From: Gabe Newton
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project
Date: Saturday, May 18, 2013 12:33:06 AM

I have lived in Claremont Canyon, and strongly oppose the proposed plan to clear cut the forests in order to reduce fire hazard. Furthermore, the plan to blanket the canyon with herbicides is preposterous. You need a much better plan than this. Please, try again.

Sincerely,
Gabe Newton
510-910-0786

From: Ben Holme
To: EBH-EIS-FEMA-RIX
Subject: I Am Against The Clear Cutting
Date: Saturday, May 18, 2013 12:05:46 AM

To whom it may concern,

As a citizen of Oakland and a native of Berkeley, I would like to express my determined opposition to the plan to cut down any significant portion of the trees in the East Bay Hills. As a citizen of California, I am against the plan to do the same on the Miller/Knox shoreline.

The proposed measures, though well intentioned, are not the kind of action we should be taking with regard to our natural woodlands. There is a value in having those woods that cannot be weighed by a fear of property loss, even of death. Would that there were a proverb for what I would like to say: by cutting down these trees, we would be making a tragic and misguided mistake.

Please, pursue other methods of practicing fire safety in our hills.

Sincerely,
Benjamin Holme

From: Sue Loper-Powers
To: EBH-EIS-FEMA-RIX
Subject: Please!
Date: Friday, May 17, 2013 11:56:48 PM

I grew up in the Berkeley Hills, then moved in Hight School to Orinda. I am very familiar with the area that is proposed to be decimated by clear cutting trees and 'treated' with Roundup. I find this plan beyond outrageous! Please pursue alternate ways of fire protection that are less hazardous to the environment.

Thank you,

Suzanne Loper-Powers
14618 Tyler Foote Rd.
Nevada City, CA 95959

From: Lindsay Ferlin
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project
Date: Friday, May 17, 2013 11:51:20 PM

I am writing to inform you that I actively oppose cutting down 85,000 trees in Oakland and Berkeley under the guise of fire prevention. I would like to request that you do not move forward with this project.

Lindsay Ferlin

From: Genevieve Gorjance
To: EBH-EIS-FEMA-RIX
Subject: Strawberry & Claremont Canyons tree removal
Date: Friday, May 17, 2013 11:46:09 PM

Hello,

I'm writing about the proposed cutting down of 85,000 trees in Berkeley's Strawberry and Claremont Canyons to make space for a BP biofuels research center. As a longtime resident of the Berkeley area, I am writing to express my outrage and disappointment in this proposal.

The Strawberry and Claremont Canyons are major scenic destinations for many people, both locals and visitors from different areas. I think you would be hard-pressed to find people who would be happier to hike out to look at a wasteland of reeking woodchips and a biofuel research center than to see a beautiful, forested valley. I wouldn't trust BP as far as I could throw it, given its disastrous safety record (the Gulf of Mexico may never recover), terrible transparency and total lack of ethics. They can put their research center somewhere else - how about downwind of one of their oil refineries?

Furthermore, any possible danger posed by forest fire is nothing compared to the clear menace of the dumping of herbicides and pesticides, including Roundup, that has been discussed. It has been proven time and time again that Roundup and similar products are carcinogenic pollutants, contaminating air and water systems, resulting in massive unintended dieoffs in animal and plant populations, and causing spikes in cancer, birth defects, serious mental illnesses, and other maladies in humans and other living beings. Strawberry and Claremont Canyons receive thousands of visitors a year and are home to millions of living organisms that are essential to the health of all who live in and visit this area - organisms that cannot survive being suffocated by poisons.

It was recently calculated that, factoring in positive effects on soil health, creation of oxygen and sequestration of carbon, and habitat for animals, a single tree is worth nearly $200,000 (if such things can be quantified). The removal of these 85,000 trees would hasten erosion, further pollute waters, destroy the local ecosystems of these Canyons, and totally deplete the health of the soil. We can afford none of this, in our age of global warming, topsoil erosion, and water scarcity. Woodchips doused in Roundup are hardly more fire-resistant than a living forest. Strawberry and Claremont Canyons will lose visitors by the thousands, and these lush areas will turn into an ugly and unhealthy wasteland. BP has no right to determine the fate of the commons, these spaces that are shared, enjoyed, and depended on by so many people and creatures. These areas should be left as they are. There are other ways to engage with fire safety, and BP can put their plant somewhere else.

Please consider what I have said. Sincerely,

Genevieve Gorjance
El Cerrito, CA

From: rainbow schwartz
To: EBH-EIS-FEMA-RIX
Subject: Stop the Proposed Clear-cutting!
Date: Friday, May 17, 2013 11:44:09 PM

To Whom it May Concern,

I am an Oakland resident and I grew up in Berkeley and I am vehemently opposed to the proposed clear cutting of 85,000 tress in the Berkeley and Oakland parks. This is an outrage! Please reconsider this short cited and environmentally damaging plan. Using an herbacide such as round-up in our hills is unacceptable! This is a beautiful wilderness area that is not a danger to the people or animals who inhabit this land. In the 30 years I have lived here there has been only ONE major fire that destroyed homes in these hills. These are not bad odds and it seems much less safe to be cutting down the trees and ruining countless habitats and poisoning the earth and ground water. This is an outrage and the timing of it (while the students who might protest this decision are in finals and/or on summer break) is SHAMEFUL.

Please reconsider this plan!

With concern,
Rainbow Schwartz
510-292-5057

From: barbara hunt
To: EBH-EIS-FEMA-RIX
Subject: No
Date: Friday, May 17, 2013 11:44:09 PM

No. No. No. Do not cut the trees. No.

From: Aaron Stevens
To: EBH-EIS-FEMA-RIX
Subject: Claremont Canyon
Date: Friday, May 17, 2013 11:35:00 PM

To whomever this may concern,

As a Berkeley resident I am deeply concerned with the plans to cut down much of claremont canyon. The hillside is of upmost importance to my life and to our community. It is one of the places that truly characterizes Berkeley. I am appalled that my tax dollars are funding such a travesty upon our community.

I understand that you have our best interests at heart, but if you truly care about the communities you are supposed to serve, you will not cut these areas down.

Sincerely,
Aaron Stevens

From: Lisa Lillie
To: EBH-EIS-FEMA-RIX
Subject: No!
Date: Friday, May 17, 2013 11:32:57 PM

Please don't cut down all of these beautiful trees. I understand fire hazards but this seems extremely reckless.
Clear out the dead wood certainly... but don't poor poison into the ground as well.
You are "throwing the baby out with the bath water."
Keep our beautiful green spaces!
The University wants its fire hazard reduced... why not ask the brilliant staff and student body to come up with a plan other than total destruction!

Lisa Lillie

From: Cathleen Maclearie
To: EBH-EIS-FEMA-RIX
Subject: no clear-cutting of berkeley, ca, trees!
Date: Friday, May 17, 2013 11:25:04 PM

---

please!

how DARE you?

keep my home free of toxic herbicides!

ROUNDUP is dangerous!

do not remove trees from berkeley and oakland california.

please!!!!!!!!!!!

cathleen maclearie

Sent from my iPad

From: Jon Garfield
To: EBH-EIS-FEMA-RIX
Subject: Don"t Chop Down 22,000 Trees in Berkeley and Oakland, CA
Date: Friday, May 17, 2013 11:08:38 PM

Please stop the plans to chop down 22,000 trees in historic Strawberry and Claremont Canyons in Berkeley, California and over 60,000 more in Oakland, California. As a resident of the area facing this destructive project, I implore you to halt this plan that will chop down thousands of trees, devastate some very beautiful land, and drench the area with the toxic herbicide Roundup.

Sincerely,

Jon Garfield

From: Linkhart Carl
To: EBH-EIS-FEMA-RIX
Subject: Clear cutting !?
Date: Friday, May 17, 2013 11:00:30 PM

PLEASE say it isn't true that you plan on destroying the beautiful trees in Claremont and Strawberry canyon ! This is a travesty that will ruin a precious environment and I am extremely disappointed in this decision and protest this moronic idea !

From: Andrew Davis
To: EBH-EIS-FEMA-RIX
Subject: Strawberry Canyon Clearcut
Date: Friday, May 17, 2013 10:59:28 PM

I have just learned of the plans to cut tens of thousands of trees in the historic Strawberry and Claremont Canyons. The lack of public notice is deplorable. This plan is unacceptable.

Andrew Davis
Santa Cruz, CA
Cal Alumni, 1982

From: Felicity Aine Doyle
To: EBH-EIS-FEMA-RIX
Subject: I oppose the 700 and 1400 gallons of herbicide planned for Berkeley hills, CA
Date: Friday, May 17, 2013 10:49:58 PM

I am horrified of the news to use 700 and 1400 gallons of herbicide on Berkeley's historic Strawberry and Claremont Canyons, as well as in Oakland. I urge you to halt and find a better and more eco-minded solution. We are just beginning to learn of the horrors of Round Up and I know you would not want to be responsible for all the tumors and deaths due to this poison entering our eco-system, and water system, as well as affecting the millions of people who live in the Bay Area. Please use sounder judgment, and find a choice that does not impact us so negatively.
Thank you,
Felicity Doyle
Resident of the Bay Area

From: Nicholas Farmer
To: EBH-EIS-FEMA-RIX
Subject: Re: Strawberry and Claremont Canyons Clearcutting
Date: Friday, May 17, 2013 10:49:39 PM

To Whom It May Concern,

I have little hope of my letter finding a receptive audience, given that Monsanto must clearly have all the important people already in their pocket, but I feel obliged to write nonetheless.

I've lived in the Bay Area most of my life, and I remember the Oakland fire. I know people who lost everything, including their lives. That said, there are better ways to manage the risks of forest fires, without clear cutting and poisoning the land. I do not make claim to know what they are, as it is not my area of expertise, but I do know that the current plan is unacceptable.

The will of the people is the sole source of legitimate power in this country, and the people will not support this.

Sincerely yours, -Nicholas Farmer

From: Darla Ken Jensen Pearce
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Hazardous Fire Risk Reduction Project
Date: Friday, May 17, 2013 10:39:51 PM

This is a public comment about the above proposed destruction of 85,000 beautiful living trees. It cannot be justified by any means. When a government agency begins to destroy the people's habitat and environment, they harm the people themselves.

It doesn't matter what you use by way of fire threats or pre~emptive strikes again the Earth ~ the fact is that these trees have survived many extreme weather elements for a hundred years or more and this idea is a harmful and destructive alternative to good land management. When government inflicts harm, they need to be replaced. If you can't manage to be productive in non-harmful ways, there is no further ~ future need for your agency to exist.

Please do not harm any of these trees. We are each interconnected in a web of life. To wantonly destroy living trees cannot be allowed or sanctioned by any thoughtful or responsible people. The fact that you wish to pour "Roundup" a pesticide that has been found to be harmful to all forms of life not just weeds adds insult to actual injury. But in this case, to prevent the natural growth of beautiful trees back into this area is nothing short of abuse. Roundup and pesticides are poisons that HARM people, property and living things that do not belong to you. Please do not take this action.

Thank you for your courtesy and cooperation in maintaining a healthy environment by not destroying anything further. Trees are living beings and need to be respected for the oxygen they provide so that humans can breathe. Do not destroy their beneficial existence for all. To go forward will bring some form of natural Karma that would not be nice to witness upon your shoulders. In this life what goes around, comes around, so we must be respectful and kind or suffer the consequences of our own "great ideas" that fall short as this one does in it's entirety.

Darla K. Pearce
1986 Yosemite Drive
Milpitas, CA 95035

A resident of Milpitas for over 30 years.

Current address: 1258 Janish Dr., Sandpoint, ID 83864

From: BILL SCOZZOLA
To: EBH-EIS-FEMA-RIX
Subject: Don"t ruin the east bay hills
Date: Friday, May 17, 2013 10:34:12 PM

Please don't destroy the trees of the East Bay Hills.
Please don't spend any money to do this.

From: Cheryl Hackworth
To: EBH-EIS-FEMA-RIX
Subject: Berkeley Clear Cutting of Trees
Date: Friday, May 17, 2013 10:19:36 PM

I was just informed of the clear cutting approved by FEMA to cut down tens of thousands of trees in Strawberry and Claremont Canyon and replace them with wood chips doused in herbicide to reduce a presumed fire threat. I implore you to reconsider. Trees are a vital part of the Berkeley ecosystem and removing them would not only damage the trees, but would affect all aspects of the environment there. There are wide spread ramifications of this decision, and while it seems like an easy fix, there are many, many more problems that would be created if this decision is carried out. In addition, the quality of life of the students and local residents will be diminished.

It is crucial you reconsider this decision and come up with an alternative decision that would have less of an impact on the life of the trees, the life of all the local fauna and wildlife, and the life of the people living there.

Thank you for taking this email into consideration.

Cheryl Hackworth, Ph.D.
UC Berkeley alum

From: Martin Kershaw
To: EBH-EIS-FEMA-RIX
Subject: NO CLEARCUTTING IN THE BERKELEY OR OAKLAND HILLS
Date: Friday, May 17, 2013 10:14:56 PM
Importance: High

Dear FEMA,
I just heard about this:

The Federal Emergency Management Agency (FEMA) is moving to chop down 22,000 trees in Berkeley's historic Strawberry and Claremont Canyons and over 60,000 more in Oakland. This destructive plan is rapidly moving forward with little publicity, and FEMA cleverly scheduled its three public meetings for mid and late May while UC Berkeley students were in finals or gone for the summer.

You must reconsider this ill conceived plan to destroy 80,000 trees in Berkeley and the Oakland Hills, and spoil the ground with the toxic chemical Roundup.
What are you thinking? These wooded areas are a respite from overcrowded overpaced cities and thousands of people use them as daily or weekend relaxation. They filter our air and provide shade.
The idea of creating a wilderness covered with toxic woodchips can only come from an enemy of nature.
What exactly is the Federal Emergency here that needs Managing by your Agency? And how much are we the taxpayers paying for this? There are plenty of areas where you could actually do some good.
Sincerely
Martin Kershaw
Oakland resident.

From: Matt & Robin Lake
To: EBH-EIS-FEMA-RIX
Subject: Please don"t cut down any trees!
Date: Friday, May 17, 2013 10:09:44 PM

Please don't cut down any trees!

Best Regards,
Matt Lake

From: Rainbow Majesty
To: EBH-EIS-FEMA-RIX
Subject: Berkeley Hills
Date: Friday, May 17, 2013 10:08:23 PM

Greetings,
I am writing in disbelief that the trees in Strawberry and Claremont Canyons of Berkeley, CA are being subject to clearcut deforestation. It is an atrocity and detriment to our community to lose what natural & ecological health & beauty they bring to our atmosphere.
I sincerely hope you and your department think of better ways to spend emergency funds.. Spraying toxic herbicide and filling these canyons with woodchips is unacceptable and we surely won't let this happen in our beloved community.
Thank you for reconsidering such horrific proposals.
Sincerely,
Tina Hylton

From: Jasmine Moorhead
To: EBH-EIS-FEMA-RIX
Subject: Please, no cutting of the trees!
Date: Friday, May 17, 2013 9:57:49 PM

To destroy the trees in these canyons is to destroy the life of the cities they stand over. This had to be one of the most ill planed, poorly conceived, short-sighted projects of all time. Look up from the massive, alienating highways. It is only the calm of the trees, the foresight of the conservationists who came before us, that keep us in the east bay balanced and full of heart. Trees are directly connected to the wellness of individuals but also to that of the cities they serve. Nowhere is that more true than in these spots. How many times I have sat reflecting peacefully in these woods you now want to torture and destroy. Please stop this horrible train of thought before it becomes action. We have enough devastation of life in this world without systematically adding to it through a terribly conceived project that will decimate the Berkeley and Oakland landscapes, and their very sense of being, forever.

Sincerely,

Jasmine Moorhead
478 23rd Street
Oakland, CA 94612
520-229-7035

From: John Dumitru
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project
Date: Friday, May 17, 2013 9:57:14 PM

I find the proposal to be completely off the mark, an unnecessary use of funds, and the use of herbicides really a dangerous and ill thought out plan. I oppose this without reservation. John Dumitru BA Humanities, BFA Film Production

From: Pam Seidenman
To: EBH-EIS-FEMA-RIX
Subject: EBH FEMA tree reduction - public comment
Date: Friday, May 17, 2013 9:57:11 PM

I have concerns about the current plan to remove trees in the East Bay Hills. While fire prevention is clearly important the current plan has several flaws:

1) There are no provisions for planting native trees and other native plants. This should be done before removing non-native trees in order to protect habitat and maintain a healthy ecosystem.

2) The use of large quantities of toxic chemicals to prevent resprouting will damage soil, water, and harm local wildlife and is not acceptable in the East Bay hills.

3) Leaving large amounts of wood chips may present a fire hazard.

This plan needs to be revised to keep the bay area safe from fire while maintaining a healthy ecosystem.

Respectfully,
Pamela Seidenman
1185 Miller Ave
Berkeley, CA 94708

From: Sue Petersen
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills
Date: Friday, May 17, 2013 9:49:41 PM

To whom it may concern:
I am writing to voice my dismay at the news of this project. Among other concerns, these projects are more likely to increase the risk of wildfires than to reduce that risk. They will damage the environment by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change. This will endanger the public by dousing our public lands with thousands of gallons of toxic herbicides. Additionally, erosion is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides. Prescribed burns will pollute the air and contribute to the risk of wildfire, endangering lives and property. Most importantly, these projects are an **inappropriate** use of the limited resources of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.
Please add my name to those who oppose the implementation of this without additional input from the affected communities and serious thought to the consequences of such action.
Thank you,
Sue Petersen

From: nancyjasa@gmail.com on behalf of Nancy Jasa
To: EBH-EIS-FEMA-RIX
Subject: STop!! East Bay Hills Fire Hazard Reduction Project
Date: Friday, May 17, 2013 9:19:06 PM

Bad Plan. Please Stop.

Nancy Jasa
1647 Willow Pass Rd., # 423
Concord, CA 94520

From: david skolnick
To: EBH-EIS-FEMA-RIX
Subject: tree cutting in Berkeley and Oakland
Date: Friday, May 17, 2013 9:10:48 PM

I understand the need to control fire risks in the East Bay, but cutting down thousands of trees and pouring poison into the earth seems a bit heavy handed and simplistic. Please come up with a more reasonable and environmentally friendly plan that you share with the affected community. Thanks.

David Skolnick
Berkeley, CA.

From: David Stein
To: EBH-EIS-FEMA-RIX
Subject: Stop killing trees!!
Date: Friday, May 17, 2013 9:10:46 PM

Stop now!!!

From: sightsixtyfour@att.net
To: EBH-EIS-FEMA-RIX
Subject: Insane,
Date: Friday, May 17, 2013 9:03:22 PM

STOP !!!! STOP !!!!!! STOP !!!!! STOP !!!! STOP !!!!!! STOP !!!!! STOP !!!! STOP !!!!!! STOP !!!!! STOP !!!! STOP !!!!!! STOP !!!!! STOP !!!! STOP !!!!!! STOP !!!!! STOP !!!! STOP !!!!!! STOP !!!!! STOP !!!! STOP !!!!!! STOP !!!!! STOP !!!! STOP !!!!!!

THIS IS A CARELESS ACTION AND VIOLATES ANY AND ALL ETHICAL ENVIRONMENTAL AND PUBLIC RESPECT AND HEALTH.

The people are watching you. Right now it may seem a move for the better to prevent future disaster but it is definitely not. Your conscious will make known your carelessness and poisoning of all the life around the Berkeley Hills area.

If you have any decency please stop this campaign. What if it was your children who would bear the aftermath of this decision ? You would not act the same way.

STOP !!!!!! NOW !!!!!!

From: Christine Fasano
To: EBH-EIS-FEMA-RIX
Subject: Environmental Impact Statement (EIS) on proposed hazardous fire risk reduction activities in the East Bay Hills
Date: Friday, May 17, 2013 9:01:31 PM

To Whom It May Concern

I am only a lay person but from what I've read it seems clear this is the absolutely wrong plan for many reasons. Anything that could endanger the water supply (as great quantities of toxic pesticides clearly would) can't possibly be the solution to reducing fire hazards. I live in the Berkeley Hills -- in a fire hazard zone -- and am far more concerned about the risks raised by this plan than by the hazards they seek to address.

Sincerely
Christine Fasano

From: alix koromzay
To: EBH-EIS-FEMA-RIX
Subject: please don"t cut the trees in Berkeley and Oakland
Date: Friday, May 17, 2013 8:51:06 PM

To whom it may concern,

I am very opposed to the plan to cut down trees in Strawberry and Claremont canyon. The trees have been there for decades and I feel it is our duty as humans to do what we can to protect wildlife and natural habitats and nature itself. Pouring herbacide to prevent regrowth? It sounds like an outrageous plan which I urge you to abandon.
Thank you.

Sincerely,

Alexandra Koromzay

From: Ryan Stephen Ghiglieri
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hazardous Fire Risk Reduction
Date: Friday, May 17, 2013 8:45:40 PM

I have lived in the East Bay my entire life and the local parks have had a profound effect on my life. They have taught me to respect and love nature like we should. This plan to cut down over 85,000 trees in the East Bay is disgusting. To top it off, 1400 gallons of Round Up is going to be sprayed over the areas where the trees once lived. I cannot see how pouring a herbicide anywhere is a good idea, let alone an area where animals and people live. These compounds are harmful to the health of residents and the animals that live in the affected areas. Hundreds of gallons of this harmful product will eventually leach into the groundwater and be washed into rivers and then right back into the Bay. I do NOT support this plan whatsoever and I think it is an idiotic thing to do because of the potential effects on people, the bay, the wildlife, and the environment.

From: Terry Galloway
To: EBH-EIS-FEMA-RIX
Subject: Support of the Northhills EIS
Date: Friday, May 17, 2013 8:39:13 PM

I support the draft EIS. I survived the two fires, but lost my home. I personally witnessed the explosive destruction of the Eucalyptus tree and their blowing, glowing embers spread the fire. It appears to balance hazardous fire risk reduction with concerns for the environment. It has addressed the concerns raised about the removal methods and impacts to plant and animal species. It has evaluated an additional 45 similar projects as connected actions. The proposed actions offer potential not only reduce risk of wildfire, but also to improve habitat, water quality and biodiversity. The “No Action Alternative” is not acceptable. FEMA should find in favor of the proposed actions and fund the applications.

---Terry Galloway
6801 Sherwick Drive
Berkeley, CA 94705-1744

From: Ken Skead
To: EBH-EIS-FEMA-RIX
Subject: Environmental destruction of Berkeley.
Date: Friday, May 17, 2013 8:38:25 PM

This genocide of trees and poisoning of the canyons by roundup in Berkeley will not happen. You are evil to think such destruction of the environment is beneficial to anyone but the companies who sell fire insurance. We will find a way to stop you, just watch.

From: ecomujeres@aol.com
To: EBH-EIS-FEMA-RIX
Subject: Monsanto and FEMA
Date: Friday, May 17, 2013 8:33:14 PM

EBH-EIS-FEMA-RIX@fema.dhs.gov,
This plan is toxic to the planet and is not healthy for any of us. Monsanto's Roundup is the dressing on this poisioness plan. Fire reduction risk is important, but this is not the way to manage it.

G. Pacifica
715 60th St
Oakland CA 94609

From: Jay Rymer
To: EBH-EIS-FEMA-RIX
Subject: "No" to deforestation
Date: Friday, May 17, 2013 8:30:00 PM

It doesn't matter if its in the Amazon or in your own backyard, deforestation is deforestation.

The very idea of choping down tens of thoudands of trees in Berkley and Oakland is concerning. This idea is disturbing because it will be destroying habitat for many species of animals, and insects. Also it will be risking human health by exposing people to toxins that prevent regrowth of cut trees.

Dont allow this mass destruction, please listen to the public and protect this beautiful land.

Thank you,

Jay Rymer

Sent from Samsung Mobile

From: Tammy Reyes
To: EBH-EIS-FEMA-RIX
Subject: Please Don"t Destroy our Home/ My Respiratory System
Date: Friday, May 17, 2013 8:28:06 PM

One of the things that make the Bay Area the wonderful place it is, is the tree's and greenery. This is what makes Berkeley and Oakland desirable cities to live in and travel to. I heard FEMA will be destroying acres of trees and wildlife. Should I burn down the tree in my yard or the bushes and grass surrounding my house to prevent fire too? No.I think EVERYONE, besides the companies making money on this project, ESPECIALLY *the homeowners and residents would agree to take the "risk" of fire to have clean air and beautiful trees near their home.*

Besides the destruction of wildlife, there are many health risks involved. **I have asthma and will be greatly effected by this fire. The smoke will effect everyone in the area and will add damage to the atmosphere.** The chemicals used will damage the environment and the residents of Berkeley and Oakland. Please don't allow this. Please don't do this. I have never before written to ANY group, government, agency or company before. This is important to me and everyone else. It's not worth it.

I, as well as most others will really respect and appreciate FEMA if they were to make a statement by stopping this.

IMAGINE THE HEADLINES: **FEMA RESPECTS BERKELEY AND OAKLAND WISHES TO SAVE LOCAL TREES!!!!!!**

please hear us: Tammy

From: Maria McLaughlin
To: EBH-EIS-FEMA-RIX
Subject: I oppose the clear cutting of trees in Strawberry and Claremont Canyon Areas
Date: Friday, May 17, 2013 8:24:08 PM

To Whom it May Concern,

It has been brought to my attention that FEMA is moving to chop down 22K trees in Berkeley's historic Strawberry and Claremont Canyon Areas.
I would like to state my opposition to this act in that it is destructive and unnecessary.

Please respond!

Thank you kindly,
Maria E. McLaughlin
--
587 63rd ST
Oakland, CA 94609

From: Hank Searfus
To: EBH-EIS-FEMA-RIX
Date: Friday, May 17, 2013 8:23:47 PM

Don't cut down these trees!!!

--
William Searfus

From: leal charonnat
To: EBH-EIS-FEMA-RIX
Subject: COVER DOCUMENT LINK BROKEN
Date: Friday, May 17, 2013 8:08:58 PM

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hazardous fire risk reduction activities in the East Bay Hills

THIS LINK DOES NOT WORK

http://ebheis.cdmims.com/Libraries/Site_Documents/Cover_Abstract_Table_of_Contents_and_List_of_Acronyms_and_Abbreviations.sflb.ashx

PLEASE SEND DOCUMENT IN REPLY

THANK YOU

--- J'ai envoyé ce à partir de mon Touchpad HP

From: Paul Cheney
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills tree removal
Date: Friday, May 17, 2013 8:05:52 PM

Thank you so much for such a lot of good work, research, planning and outreach. As someone who lives in the East Bay Hills and enjoys walking, etc.,
in the area, I really appreciate all your efforts. I look forward to a much improved natural environment, and a safer one, as a consequence of this
process.

Paul Cheney
Oakland

From: Elena Naskova
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 7:52:25 PM

What's wrong with you people? You're fire hazard, too. Why destroy the trees? People are the biggest fire hazard. Does anyone goes around killing people for that. What a crazy idea.
Stop it. You have no right to kill the trees.

How dare you?

From: Calvin Tam
To: EBH-EIS-FEMA-RIX
Subject: FEMA Grant for Berkeley, Oakland, Calif
Date: Friday, May 17, 2013 7:49:00 PM

Hello:

re: EIS for Hazardous Fire Risk Reduction

I fully support the proposed FEMA grant to remove Eucalyptus trees in Claremont Canyon requested by University of Calif, Berkeley, The City of Oakland, and EBRPD. Please approve this money. The Eucalyptus trees are dangourous and pose a fire hazard.

Thank you, Calvin F Tam

From: Victor Gold
To: EBH-EIS-FEMA-RIX
Subject: in support of funding the projects
Date: Friday, May 17, 2013 7:44:54 PM

May 18, 2013

Dear Sirs and Madams,

We support the proposed actions analyzed in the East Bay Hills Hazardous Fire Risk Reduction Environmental Impact Statement. The three public agencies need to manage their lands for wildfire safety. Annually, we as private property owners are required to maintain defensible space around our homes to reduce the risk from wildfire. Public agencies need to do their part to make our communities safer.

Furthermore, we support the draft EIS. It appears to balance hazardous fire risk reduction with concerns for the environment. It has addressed the concerns raised about the removal methods and impacts to plant and animal species. It has evaluated an additional 45 similar projects as connected actions. The proposed actions offer potential not only reduce risk of wildfire, but also to improve habitat, water quality and biodiversity. The ?No Action Alternative? is not acceptable. FEMA should find in favor of the proposed actions and fund the applications.

PLEASE do not let a vocal minority stall these projects any further at the risk of another major wildfire. The proposed hazardous fire risk reduction projects need to be completed. The EIS shows they can be done while protecting environmental concerns. Finalize the EIS and allow the work to begin.

We are residents of the fire area and have owned a house here since 1982. Although the fire started directly across the street from us, by great good fortune our house was one of only 7 in this area to be spared. My wife still vividly remembers fleeing on foot out the back yard with our 2 small children. Please, do not delay any longer. Please remove this looming fire hazard and allow our area to be planted with redwoods instead of the insidious eucalyptus and Monterey Pines. Please do not pay attention to the HCN and their ignorant, revisionist nonsense about the safety of these trees.

Sincerely,

Victor and Christine Gold

Victor Gold

Rastergraf

7145 Marlborough Terrace
Berkeley, CA 94705
(510) 849-4801
email: victor@rastergraf.com

From: Francine Gobel
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 7:43:03 PM

Dear FEMA,

Please don't cut down the trees. Environmentally we need them. As a community, and as an ecosystem we need those trees for myriad reasons. Please reconsider. I have faith that FEMA will do the right thing, and channel your resouces into other more needed projects. Thanks for your time.

Sincerly,

Francine Gobel
Redwood City

From: Amber Berglund
To: EBH-EIS-FEMA-RIX
Subject: NO Clear-cut of Claremont Canyon - Don"t cut the 85,000 trees and then dump Round-Up...NO
Date: Friday, May 17, 2013 7:37:05 PM

Please do not cut down the trees in the San Francisco Bay canyons and then dump Round-up on everyone.
NO to this plan.

Please cancel the plans to cut down the trees and poison Californians with Round-up.

Amber Berglund

From: sarah skaggs
To: EBH-EIS-FEMA-RIX
Subject: NO on the East Bay Hills hazardous fire risk reduction project
Date: Friday, May 17, 2013 7:27:58 PM

To Whom It May Concern:

I am writing to voice my strong opposition to the proposed plan to clear cut 85,000 trees from the East Bay forest and pour toxic herbicides on the into the environment to prevent future growth.

The long-term damage far outweighs any fire prevention measures clear-cutting proposes to solve:

- erosion and the resulting floods during rainy season
- increased wind damage
- increased pollution as there are fewer trees to filter air and water toxins
- increased C02 as the result of decomposing tree remains + logging
- toxic chemical entering sources of drinking water
- damage to soil
- unsightly and harmful to tourism and quality of life
- diminishment to wildlife habitat

There are viable alternatives to clear-cutting, namely:
- selective harvesting
- increased education around and enforcement of preventive landscaping

Do not let this project go through - the results will be disastrous.The Bay Area--and UC Berkeley for that matter--is known for its forward thinking and innovation. Let's try to find another way to preserve our already shrinking natural resources.

Thank you for your consideration, and feel free to contact me if you have further questions.

Sincerely,

Sarah Skaggs
San Francsico, CA
415.902.6832 (m)

From: Cydney Nero
To: EBH-EIS-FEMA-RIX
Subject: OH YOU BETTER NOT, THIS IS MY BACKYARD
Date: Friday, May 17, 2013 7:23:17 PM

22,000 trees in Berkeley? 60,000 trees in Oakland? HOW DARE you threaten to do this to California's most beautiful area! I am so angered by this news.
I would HATE to see what now surrounds the campus and the communities with beautiful, diverse trees, to be later turned into tan bark and pesticides. YOU will be destroying the beauty of nature, the quality of air, and the history that all these trees represent. I have never been an activist, and I don't call myself one, but this is one issue that is mind-blowing. I have to stand up and speak my mind, because this is my home, and I do not want to go outside and find nothing but wood chips on the ground.

From: Dawn Farber
To: EBH-EIS-FEMA-RIX
Subject: clearcutting
Date: Friday, May 17, 2013 7:21:15 PM

People,
It is so shortsighted of you to clear cut and use herbicides on the UCB owned lands in Berkeley.
Surely you have less toxic solutions?

Dr. Dawn Farber. Psy.D. MFT
Personal and Supervising Analyst and Faculty,
Psychoanalytic Institute of Northern California (PINC).
587 Walavista Ave, Oakland CA 94610 (mailing address too)
(510) 763-4531

From: John & Barbara Erickson
To: EBH-EIS-FEMA-RIX
Subject: Strongly object to plans!
Date: Friday, May 17, 2013 7:21:15 PM

Certainly you can't be thinking of cutting down 85,000 trees and using Round Up in these beautiful canyons! This cannot happen.

Barbara Erickson
1511 Edith St.
Berkeley, CA 94703

From: Yaminah Abdur-Rahim
To: EBH-EIS-FEMA-RIX
Date: Friday, May 17, 2013 7:16:01 PM

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you cannot cut down the trees. end of story

From: Cory Roberts
To: EBH-EIS-FEMA-RIX
Subject: Nonsense
Date: Friday, May 17, 2013 7:13:19 PM

To whom it may concern;

It is a travesty that you have made plans to clear-cut trees throughout the Bay Area. I am writing this to state my clear opposition to the idea that these trees present a fire hazard. Wood burns. This is a fact: so do homes and landfills. Why not just bulldoze it all? Yellowstone national Forest has been a burden on our budget, let's do away with that while we're at it. Come to think of it, let's just bring in a bunch of sand and turn the whole area into a desert.
I grew up in the East Bay, and the trees there are as much an integral part of the area, if not more than, the university.
Whatever the true motives behind this action are, please reconsider.

Sincerely,
Cory Roberts

From: George Petrov
To: EBH-EIS-FEMA-RIX
Subject: Draft EIS for East Bay Hills Tree Cutting
Date: Friday, May 17, 2013 7:11:57 PM

Sirs,

It's with utter disbelief that I read the proposal essentially to clear-cut the trees in the Claremont and Strawberry Canyons followed by spreading pesticide to prevent greenery from ever emerging again. Good grief, why not just cement the whole hillside and be done with it? At least then you will not have the inevitable mudslides.

This is an absurd waste of taxpayer funds, especially in times of austerity. I, a 30-year resident of the area who loves hiking frequently through these unique and beautiful hills, am adamantly opposed to this proposal.

If fire control is actually the goal of this barbaric idea, then I ask you to please consider alternative ways to mitigate the fire risk, for instance thinning underbrush and removing dead trees. This wholesale approach is disproportionate to the actual risk, and will scar the face of the area forever.

Respectfully,

George Petrov
1619 Union St
Alameda CA

From: Miriam Weinstein
To: EBH-EIS-FEMA-RIX
Subject: cutting 85,000 trees in Berkeley canyons.
Date: Friday, May 17, 2013 6:59:30 PM

Actually, it seems to me that cutting 85,000 trees will dry out the area even more, destabilize hills, create bad run-off during monsoons, lose wildlife habitat and add to air pollution. What a great idea. And while you are at it, put toxic herbicides on the soil that will runoff with the rains. I'm so glad the brilliant minds at UC Berkeley are in collusion with you. (I'm being sarcastic.) Please don't cut down these trees. And if you do, please cut down only a few thousand, and rather than put toxins in the soil, at least replant with native vegetation (assuming what you are planning on cutting isn't native.)
Do we still have James Watt and Ronald Reagan running things, who never saw a tree they liked?
Thank you,
Miriam Weinstein
7 Oak Tree Lane
Fairfax, CA 94930

From: Teray Garchitorena
To: EBH-EIS-FEMA-RIX
Subject: Stop Clear Cutting in the Berkeley and Oakland Hills
Date: Friday, May 17, 2013 6:52:39 PM

I am writing to protest the plan to not only cut non-native plants and native shrubs in the Berkeley & Oakland hills, but to douse our pristine hills with thousands of gallons of herbicide. This is unacceptable.
I understand the need to reduce fire hazard and that some reduction in density may be helpful. But the broad scope of the cutting, and the toxicity of pouring herbicides to stop any future growth is atrocious and disgusting.
The East Bay is home to petroleum refineries which emit gasses that hazardous to health, especially that of children and elders. Trees provide protection and removal of these pollutants and are essential to our quality of life.
I strongly urge that this plan be re-considered and re-formulated to be more selective in the removal of excess fuel, and no be non-toxic to living things.
Respectfully,

--

Teray Garchitorena, ND
Berkeley Naturopathic Medical Group
510.845.8600

www.berkeleynaturopathic.com

BerkeleyNaturopathic

If you would prefer not to exchange personal health information via email, please contact us at the above phone number.

By replying to this email, you acknowledge that you are aware that email is not considered a secure method of communication, and that you agree to the risks.

This email and any files transmitted with it are confidential, and intended solely for the use of the individual to whom they are addressed. If you have received this e-mail by mistake, please notify the sender immediately and delete the message from your system, without disclosing, copying, distributing or taking any action in reliance on its contents. Thank you for your compliance.

In a medical emergency, do not e-mail your doctor. Dial 911.

From: Tevya Tufford Fetter
To: EBH-EIS-FEMA-RIX
Subject: PLEASE DON"T CLEAR-CUT OAKLAND!!!
Date: Friday, May 17, 2013 6:49:41 PM

I strongly oppose the plan to clear-cut the trees in Strawberry and Claremont Canyon. Those trees have been there for decades and hardly constitute a "hazard." Pouring 1400 gallons of herbicide on the currently pristine hills, however, will create the real hazard, particularly UC Berkeley's plans to use the highly toxic herbicide "Roundup" to squelch the return of non-native vegetation. This is tragedy!!! Please, please, please do not let UC Berkeley do this!!! With the rate of loss of our forests and wildlife habitats, plans such as this should be absolutely forbidden by law, in my opinion...our beautiful bay area does not need more brown, and it certainly does not need more chemicals poured onto the ground, contaminating the area for any future growth.
Thank you for listening...I really hope you do!
Sincerely,
Tevya Tufford Fetter
Judah Street
San Francisco, CA

From: Claire
To: EBH-EIS-FEMA-RIX
Subject: TREES
Date: Friday, May 17, 2013 6:47:59 PM

PLEASE don't cut down Strawberry and Claremont Canyons! They are a boon to the community. Please don't use roundup! It will poison our gardens!!!!!!!

Claire Diamond
Oakland, CA 94611

From: Rob Hogencamp
To: EBH-EIS-FEMA-RIX
Subject: Clearcutting Strawberry and Claremont Canyon
Date: Friday, May 17, 2013 6:47:05 PM

Please don't do this!

Rob Hogencamp
Executive Chef
Ceres Community Project

Sent from Yahoo! Mail for Windows 8

From: Ashley Miller
To: EBH-EIS-FEMA-RIX
Subject: Clear-cutting of Berkeley and Oakland Tree
Date: Friday, May 17, 2013 6:43:40 PM

To whom it may concern:

I do NOT support the clear-cutting of 85,000 Berkeley and Oakland trees, including 22,000 in historic Strawberry and Claremont county. The trees have been there for decades and have not caused any hazardous situations. The spreading of between 700-1400 gallons of herbicide including roundup, however, WILL create a hazard to the surrounding area. I am left in disbelief and am appalled that our government is spending money on such a horrific project instead of pursuing more important needs. This proposal needs to be denied for the best of the bay area environment and people.

Ashley Miller
UC Davis Student

From: David Gaian
To: EBH-EIS-FEMA-RIX
Subject: DO NOT SPRAY HERBICIDES TO COMBAT INVASIVE PLANT AND TREE SPECIES!!!
Date: Friday, May 17, 2013 6:39:57 PM

I'm writing to express my concern about the plan to cut down these "non-native" trees to reduce fire risks.

I think it may be a good idea in the long run to remove invasive species and simultaneously reduce risks of wildfires. HOWEVER, I'm extremely disturbed by the fact that your plan calls for using tons of herbicides to prevent regrowth.

The herbicides proposed are known to cause severe environmental damage, including death to numerous plants and aquatic species such as frogs, fish and salamanders. Who knows if the native trees could survive in the midst of that volume of herbicides?!

Chipping the non-native trees into mulch in place will quell much regrowth. With some creative management plans that could recruit local community involvement, you could better prevent invasive regrowth. Local community volunteers, including students and elderly, could replant native species and monitor the area for decades to come, removing invasive species if/when they emerge.

Please do not poison our watersheds, vegetation and wildlife with TONS of HERBICIDE!!!

Thank you,

David Gaian

From: JoAnne Reinhart
To: EBH-EIS-FEMA-RIX
Subject: Do NOT destroy these trees!!!!
Date: Friday, May 17, 2013 6:37:50 PM

To who it may concern:

Do NOT cut down these trees!!!!!!!!! Why are you destroying these beautiful trees? A fire hazard, yet you will put down wood chips and use Roundup? I can see that you do NOT care about the environment!
Why is this so secretive?
JoAnne Reinhart

From: Caterina Glasser
To: EBH-EIS-FEMA-RIX
Subject: Dont Clear-Cut 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 6:35:54 PM

To Whom it May Concern,

Trees are a vital part to our ecosystem, I am surprised for how progressive UC Berkley is, that no solutions have been offered or made that will counteract killing 85,00 trees.I don't even live in Berkley and Oakland to know that clear cutting 85,000 trees is a big mistake. Think about the many homes that you will be cutting down for the local species. Please work with nature and consider pruning the trees if they do in fact pose as a fire hazard, or replanting them. Thank you.

Sincerely,
Caterina Glasser

http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees

From: Arianna Cassidy
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Hazardous Fire Risk Reduction
Date: Friday, May 17, 2013 6:33:57 PM

Hello,

I am writing to express my vehement opposition for the planned East Bay Hills Hazardous Fire Risk Reduction project. Strawberry and Claremont Canyons are Bay Area treasures, not to mention vibrant natural areas.

Sincerely,

Arianna Cassidy
510-502-9239

From: Kamila Kennedy
To: EBH-EIS-FEMA-RIX
Subject: Outraged at the prospect!
Date: Friday, May 17, 2013 6:29:32 PM

To whom it may concern:

If there is a fire hazard in Strawberry & Claremont Canyons, non-toxic brush removal can be accomplished through the use of goats. Removing trees that have been there for decades is a ridiculous way to deal with fire threat. It the trees need thinning out, thin them but DO NOT clear cut them as that is pure insanity. Clear cutting followed by hazardous materials to retard growth is not the way real Californians deal with the environment. Shame on you for even considering it! I wonder whose pockets will be filled by this proposition.

Thanks for your consideration,
Kamila Kennedy

From: Chris Young
To: EBH-EIS-FEMA-RIX
Subject: OPPOSE tree cutting: Berkeley/Oakland (FEMA)
Date: Friday, May 17, 2013 6:21:52 PM

To whom this may concern -

I just got word of this current information:

FEMA Releases Draft Environmental Impact Statement Addressing Hazardous Fire Risk Reduction Projects in East Bay Hills

I STRONGLY oppose this happening. When you cut down trees, you cut down the "lungs" of the earth.

I think it's really rediculous that the trees, who sit there still and calm, pose a "proposed fire hazard". There are MANY things on this planet that could be labeled as the same proposal.

I ask that you please reconsider this and leave the trees where they are. There is more damage in cutting them down - the hazard is the fear that's behind this proposal!

In Creative Inspiration, Joy and Consciousness,

Chris Young-Ginzburg
a.k.a. FLUIDGIRL
Performance Artist, Entertainer, Holistic Life Guidance

PERFORMANCE/DANCE CLASSES: www.Fluidgirl.com
HOLISTIC LIFE GUIDANCE: www.DivineHealingAspirations.com

Be yourself. Everyone else is taken." - Oscar Wilde

From: Alex Hughes
To: EBH-EIS-FEMA-RIX
Subject: East Bay Tree Culling
Date: Friday, May 17, 2013 6:17:48 PM

I think your scheme to chop down all those trees in the East Bay (Berkeley, Oakland, in California) is a horrible idea and a huge waste of public funds.

From: nancy pili
To: EBH-EIS-FEMA-RIX
Subject: Against the use of Round up on the East Bay Hills
Date: Friday, May 17, 2013 6:10:43 PM

Hello,
My name is Nancy Hernandez and I am a life time resident of the Bay Area. Currently living and working in Oakland. I'm writing to express my strong opposition to the proposal to kill trees on the East Bay hills using Round Up.

My father worked for Caltrans in the East Bay most of my life and he was exposed to the chemical for years. He attended all the annual trainings to teach the uses and components of the chemical. He passed away from health problems last summer.

He explained to me how and why the state uses that product, and being a veteran, he also explained the history of the Monsanto Corporations development and use of the product. Agent Orange affected many of his peers and has had horrible impacts on land and water resources.

I am currently working at a nonprofit that is aimed at raising awareness on water contions. I have learned here much more about the impacts that the Monsanto Corporation has had worldwide on water pollution, GMOs, and privatization of seeds. This is not a company that any California city should be investing in right now. And definatly not a product we should be dumping into our waterways.

I stand adamantly opposed to the FEMA proposal to remove trees from the East Bay Hills, especially using a toxic chemical coming from a corporation with so many ill impacts.

--

~Nancy Hernandez
Water Writes Project Manager
The Estria Foundation
www.estria.org

From: Jolie DePauw
To: EBH-EIS-FEMA-RIX
Subject: NO Chopping Down Trees and NO on Herbicides - TERRIBLE IDEA!!
Date: Friday, May 17, 2013 6:10:35 PM

To whom it may concern:

As a resident of the Bay Area, I'm writing to express my concern about the plan to cut down these "non-native" trees to reduce fire risks.

I think it may be a good idea in the long run to remove invasive species and simultaneously reduce risks of wildfires. HOWEVER, I'm extremely disturbed by the fact that your plan calls for using tons of herbicides to prevent regrowth.

The herbicides proposed are known to cause severe environmental damage, including death to numerous plants and aquatic species such as frogs, fish and salamanders. Who knows if the native trees could survive in the midst of that volume of herbicides?!

Chipping the non-native trees into mulch in place will quell much regrowth. With some creative management plans that could recruit local community involvement, you could better prevent invasive regrowth. Local community volunteers, including students and elderly, could replant native species and monitor the area for decades to come, removing invasive species if/when they emerge.

Please do not poison our watersheds, vegetation and wildlife with TONS of HERBICIDE!!!

Thank you,

Jolie Diane De Pauw

From: Achim von Neefe
To: EBH-EIS-FEMA-RIX
Subject: wildfire hazard mitigation projects for the East Bay Hills
Date: Friday, May 17, 2013 6:08:28 PM

Achim von Neefe
6120 Hill Rd
Oakland, CA 94618

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

Re: Support of EIS for East Bay Hills

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term improvements to the native landscape should move forward without delay. We Claremont Canyon residents know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive. Thank you for supporting this important work. Please approve the EIS as soon as possible.

Regards,

Achim von Neefe

From: Jolie DePauw
To: EBH-EIS-FEMA-RIX
Subject: NO CHOPPING DOWN TREES IN BERKELEY"S HISTORIC STRAWBERRY AND CLAREMONT CANYONS!!!
Date: Friday, May 17, 2013 6:06:09 PM

HELLO,

I AM OPPOSED TO SUCH RECKLESS DESTRUCTION OF OUR BEAUTIFUL TREES. BAD IDEA.

NO CHOPPING DOWN TREES IN BERKELEY'S HISTORIC STRAWBERRY AND CLAREMONT CANYONS!!!

THANK YOU,

JOLIE DIANE DE PAUW

From: julie litwin
To: EBH-EIS-FEMA-RIX
Subject: tree cutting in the East Bay
Date: Friday, May 17, 2013 6:04:14 PM

To Whom It May Concern,
I am 100% opposed to the plan for massive clear-cutting of trees and application of pesticide in Strawberry and Claremont Canyons and in the Oakland hills. I hike frequently in these areas and love the beautiful trees. The plan would not decrease fire danger, as a thick layer of mulch would cover the ground, and the area would be poisoned and rendered useless for recreation and wildlife habitat. I can't imagine a worse idea, not to mention it being a huge waste of money!!!
Sincerely,
Julie Litwin
427 62nd St.
Oakland, CA 94609
jblitwin@yahoo.com

From: Sabrina Dolan
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyons tree removal
Date: Friday, May 17, 2013 6:04:08 PM

I would like to voice my opionion - I do not aggree with removal of the tress in Strawberry and Claremont Canyons of Berkeley and Oakland, CA.

The highly toxic herbicide, Roundup, is more dangerous to our health that the possibility of a fire.

The eucalyptus tress set to be destroyed are important Great Horned Owl habitat. Not to mention many other animals homes.

No one wants to see all these trees go. It will make our area stark, ugly and toxic.

DO NOT CUT THE TREES.

- Sabrina Dolan

From: Michael Lubrano
To: EBH-EIS-FEMA-RIX
Subject: Clear cutting 85,000 Trees in Berkley is an act of Eco-terrorism
Date: Friday, May 17, 2013 6:03:16 PM

I am amazed that someone drawing a paycheck paid for by the public would even consider such a reckless notion as clear cutting 85,000 trees as a method of fire control and rubbing salt in the wound to use pesticides to ensure NOTHING else will grow. Aren't there any scientists working for FEMA?

I am a Restoration Horticulturist which means I study the science and art of environmental restoration using natural methods. The planet needs ALL the trees we have right now. We cannot afford to lose anymore. Trees are an important part of our biosphere and the hydrologic cycle. They
absorb carbon dioxide and release oxygen, they recycle water through the process of evapo-transpiration and ultimately help regulate the climate so that we don't get wide swings in weather patterns and temperature. Not to mention they provide food and habitat to untold billions of microbes which create soil from fallen leaves. Terrestrial species of animals also depend on the trees for food, habitat and life itself. Humans are included in this equation. We need trees to survive.

In does no good to cut down trees to protect us from fire hazards if there is nobody left on what will become a very hot and barren landscape filled with toxic pesticides that will undoubtedly seep into the ground water and food supply.

I demand that FEMA and all other involved parties cancel any plans for cutting these trees. it is the height of irresponsibility and in my opinion would be a government sponsored act of eco-terrorism.

Michael Lubrano

From: Anne Elkins
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills fire reduction
Date: Friday, May 17, 2013 5:50:50 PM

Your project Strawberry and Claremont Canyon proposed clear cutting as well as the tree destruction plans for the East Bay, is outrageous and ridiculous. In a world where trees are disappearing at an alarming rate, this is exactly the wrong thing to be doing. And then, adding insult to injury, pouring roundup there and poisoning this unspoiled area is unconscionable. And what about the wildlife that lives there? You will be reducing yet more habitat, killing off more birds and other animals, that many of us enjoy sharing the planet with. There is no excuse for wasting federal dollars on this wasteful, environmentally irresponsible project. And trying to keep it as secret as possible, so that citizens have no input is sadly becoming typical operating possibly. No wonder the government is not in great favor right now with the American people. I urge you to find more environmentally responsible methods of reducing fire risk. This is wrong, wrong, wrong!

I live in Washington State now, but lived in California for 30 years prior and still feel very connected to the state and all its beauty.

Anne Elkins
Anacortes, WA

From: Carol Verburg
To: EBH-EIS-FEMA-RIX
Subject: don"t destroy Berkeley trees!
Date: Friday, May 17, 2013 5:50:25 PM

The trees in Strawberry and Claremont Canyon have been there for decades and hardly constitute a "hazard." But pouring 1400 gallons of herbicide on the currently pristine hills will create a real hazard, especially if UC Berkeley uses the herbicide "Roundup" to squelch the return of non-native vegetation.

How does the govt. have money for this destructive project while Head Start and public housing programs are being cut due to the sequester?

Rethink your priorities, avoid a PR disaster, and leave the trees alone!

Carol Verburg
94133

From: danielzevin@aol.com
To: EBH-EIS-FEMA-RIX
Subject: I am opposed to your proposed tree removal from Strawberry and Claremont Canyons
Date: Friday, May 17, 2013 5:49:52 PM

To Whom It May Concern:

I want you to know that I am vehemently opposed to your plan to remove some 85,000 trees, including 22,000 from Strawberry and Claremont Canyons in Berkeley and Oakland California with no plans for replanting. These canyons are vital watersheds and wildlife corridors, which are extremely rare in this area. Not only that, your plan to use Roundup in the process is even more disturbing. The known harm this herbicide poses to life (both human and otherwise) far outweighs any potential benfits it my provide. Please re-think your plan now and come back with something the local community can support. Fire safety is a concern to all, but even a fire in these canyons would be far preferable to your clear cut and poison plan.

Thank you,

Daniel Zevin

From: William Burnett
To: EBH-EIS-FEMA-RIX
Subject: Cutting east bay trees
Date: Friday, May 17, 2013 5:49:06 PM

Don't do it!!!

Sent from my iPad

From: Emma
To: EBH-EIS-FEMA-RIX
Subject: AGAINST TREE REMOVAL
Date: Friday, May 17, 2013 5:45:26 PM

I have been a Berkeley citizen all of my life, and I am absolutely against this project. Removing these trees would be a huge tragedy and a detriment not only to native wildlife of the region, but also to the quality of life of all East Bay citizens. Trees help maintain good air quality and add to the richness of the environment.

Surely we can work on alternative ways to prevent and control wildfires in our community.

PLEASE do not go through with this project!

Sincerely,
Emma Claudeanos

From: dykes.anthony@gmail.com on behalf of Tony Dykes
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project comment
Date: Friday, May 17, 2013 5:43:17 PM

So I am motivated to write this after reading several internet accounts of the impending slaughter of 85,000 trees in the Berkeley/Oakland hills, those accounts called me to action. http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees

However, the articles I read did not seem to have any cogent arguments behind them besides 'trees should be saved whenever possible', as if you were logging a virgin Redwood forest instead of culling non-native species to protect it. Please ignore this strange uproar. I live here and I would prefer not to die in a fire if you can do something about it.

This is bad PR. You could have pitched it as saving the forest from intrusive species that threaten the entire ecosystem with an unnatural fire risk, and they are making you look like tree killing bastards.
Plant a couple of Sequoias?

Tony

From: Michael Baker
To: EBH-EIS-FEMA-RIX
Subject: Plan to cut down trees in Oakland and Berkeley
Date: Friday, May 17, 2013 5:27:30 PM

To whom it may concern,

I am strongly opposed to the plan to cut down 22,000 trees in Strawberry and Claremont Canyons. I understand the need to take steps in the name of fire prevention, but cutting down thousands of trees with no plan to replant them would be a unconscionable disaster, as would be soaking the hillside in the toxic herbicide Roundup.

Please reconsider this decision and think about a more scaled-back plan.

Sincerely,
Michael Baker
6224 Hillmont Drive
Oakland, CA 94605

From: Dan I. SLOBIN
To: EBH-EIS-FEMA-RIX
Subject: removing trees in the Berkeley Hills
Date: Friday, May 17, 2013 5:25:45 PM

The news of your intention to clear-cut a large part of our environment has aroused me, my family, my friends. We've wandered through those lovely wooded hills for decades, and cherish memories of hikes, romances, picnics, nature watching. The image of spending what will probably be the rest of our lives facing bare hills is really, really distressing. And just as troublesome is the plan to infect our environment with a carpet of chemicals.

I have another concern, which doesn't seem to have been mentioned in the information that has reached me: What of all of the living creatures that live in, live on those trees and that world? I assume that your plan is to simply let them die or migrate, with unknown chain effects for our ecology.

Finally, in this era of sequestration, when funds are cut for helping living people--children, mental and physical health facilities, and on and on--how can you justify the expenditure of funds on something of questionable value?

A concerned Berkeleyan,
Professor Emeritus Dan I. Slobin

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<><><><><><><><><><><><><><><><><><><>
Dan I. Slobin
Professor Emeritus of Psychology and Linguistics
University of California, Berkeley
email: slobin@berkeley.edu
address: 2323 Rose St., Berkeley, CA 94708
http://ihd.berkeley.edu/members.htm#slobin
<><><><><><><><><><><><><><><><><><><>

From: Ben Mangus
To: EBH-EIS-FEMA-RIX
Subject: your chopping doin ONE MILLION trees
Date: Friday, May 17, 2013 5:22:17 PM

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what the fuck. i tough uc berkeley of all places wants to help the planet. but i guess not. 1000000 trees in the east bay, gone, tanking away its natural beauty by a million trees. all cutty too. you guys are abunchofdicks

From: sanam jorjani
To: EBH-EIS-FEMA-RIX
Subject: Clearcutting of East Bay Hills
Date: Friday, May 17, 2013 5:21:02 PM

Having lived in the Bay Area for over 29 years, and Berkeley for 10 years, I am hugely disappointed at the move to clearcut trees. Surely no knowledgable government or public agency thinks that pouring pesticides into our hills is somehow more safe than possible fired hazards. The logic employed here would mean trees and forests across California, and the world should be disappeared to reduce fire hazard. Indeed, no trees or brush anywhere would greatly reduce fire hazard to homes, and destroy the earth our homes are built on.

Even more outrageous is the attempt to keep this plan silent. Holding community forums are of no value when these forums are not widely circulated and publicized, and it is the burden of the planning agency to make sure the message is clear to the community, otherwise the process undermines our democracy.

I am asking the agency to not only reconsider it's move to clearcut, but to immediately broadcast widely it's plans and dates for public hearing. Many local blogs, radio and news stations will be willing to spread the information and call for community input, if you give them the opportunity.

With all do respect, this is our city and we should be involved in this process.

Sincerely,

Sanam Jorjani

From: Marsha Vaughn
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Hazardous Fire Risk Reduction Environmental Impact Statement
Date: Friday, May 17, 2013 5:19:29 PM

Hello,

I am writing in strong protest against this plan. Not only are you destroying an incredibly beautiful natural resource in the area but you would be poisoning everyone and every thing down hill from the site with the application of RoundUp. I cannot even describe how strongly I oppose this plan. I pray you will change your minds and not commit this insane act of destruction.

Sincerely,
Marsha Vaughn
Richmond, CA

Want to vacation in Maui? See http://www.vrbo.com/286378

Take time to laugh. It is the music of the soul.

From: heidics3@gmail.com
To: EBH-EIS-FEMA-RIX
Subject: Re: Oakland and Berkeley
Date: Friday, May 17, 2013 5:18:07 PM

As a life long resident of the East bay area, including Oakland-in 1989, the fire that year playing a major role in our move to nearby alameda-I was sickened to read http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees . I would like to humbly request that the two areas in question be left the fuck alone. The fear of fire leading directly to saturating the soil with pesticides is put mildly as absurd. As a dog owner as well as someone with a literal emotional attachment to the soil I call home, I implore you to, well, just leave it all, the soil and especially the trees, alone. Please advise as to any opportunity to attend a meeting or discussion on the matter so my passion might be heard in my voice, as well as my words.

Best,
Heidi Schmierer

Sent from my iPhone

From: Michael Small
To: EBH-EIS-FEMA-RIX
Subject: Clear-Cutting
Date: Friday, May 17, 2013 5:17:59 PM

Greetings,

I protest the clear cutting of the Strawberry and Claremont Canyons. There are more thoughtful ways of removing non-natives while protecting residents from fires. We need to think about those hills and our fisheries as well. This plan is a quick, cheap, and dirty "fix" that will affect our hills and waterways for a generation. Let's get the eucalyptus out -- but in a way that we won't regret come next rainy season.

Sincerely,

Michael Small
Berkeley Resident

From: Lindsay King
To: EBH-EIS-FEMA-RIX
Subject: UC Berkeley Clear Cutting
Date: Friday, May 17, 2013 5:12:00 PM

To whom this may concern--

I am writing you today concerning the grant submitted by UC Berkeley to remove 85,000 trees from Strawberry and Claremont Canyons. I am writing not just as a concerned citizen, but as someone who feels the need to step up and speak for nature.

I'm not certain what it is about today's society. We have a lack of respect for nature. Although seemingly well intentioned, Al Gore's documentary “An Inconvenient Truth” seemed to turn environmentalism into a trendy cause—instead of actually caring about what is going on around you, one can simply help the environment by purchasing the right products (light bulbs, hybrid cars, etc.) Again, although well intentioned, most people did this instead of looking around them to see the atrocities occurring. How did we let the Alberta Tar Sands become the way they are? Why is there nothing but constant deforestation? Why have we given most developers a free range for their projects?

This particular FEMA project is no different. It's in place to prevent fires that have not yet happened. As someone who grew up in an area prone to wildfires (Ventura county), I can tell you that trees were not the cause of it. Just thinking in realistic terms—dry objects burn better. Wild brush is a magnet for these type of events. Mitigation such as removing said brush is the best mitigation one can ask for. Ventura county has these influx of fires, but they aren't covered in trees—those have been removed by development. The Camarillo Springs grade is littered with wild brush and cacti. Trees are not found there.

When I was getting my undergrad degree in Environmental Studies, we discussed a concept called the Precautionary Principle. It basically states that, instead of waiting to find out if an activity or an object is problematic to the environment, we should stop it altogether. This concept seemed well intentioned when it questioned new Japanese fishing methods that looked to deplete entire fish populations, but since its inception it's been completely changed to mean something entirely different.

Now, it's true that these trees could potentially pose a fire threat sometime in the future. Even if years of inactivity have proven to not be an issue, a fire could happen. Therefore, if we deforest the entire area, perhaps we are making it a safer place. Moreover, the usage of pesticides will further prevent any dangerous “forests” from growing back.

This argument is so inane and devoid of any sort of logical backing that its sickening. We as a society have so little respect for nature that we truly view it as our enemy? We are unable to form any sort of relationship with our surroundings that we can't find a way to co-exist? True environmentalism shouldn't be viewed as a liberal or conservative cause but a human cause. When we destroy these ecosystems, we can't bring them back. Even if the trees find a way to eventually come back, all the damage to the animals living there has been done. The Bay Area is so heavily developed that these little pockets of nature are a blessing and a time

capsule to our past. We should protect them and revere them. We shouldn't find anyway possible to destroy them.

If you really want to prevent fire damage in the Bay Area, why not look to what has caused fires in the past? The entire developed area is on a fault line. Any basic geology class will tell you this. Plate tectonics hold the fate of the Bay Area in its hands. Moreover, a good portion of the Bay Area is on unstable landfill. Every time there has been a sizable earthquake, gas lines have broken and fires have run rampant in the cities. Therefore, if we have actual proof that this happens, then wouldn't the logical argument be to bulldoze the entire Bay Area? That way, when future earthquakes occur, we don't have to worry about property damage and loss of life?

That above argument is just as logical as the one you are proposing in these canyons. Instead of working with something reasonable (weed abatement, public education, etc.) you are going to the other extreme—wiping out the “problem” altogether. The only difference is that nature is disposable. Human need to live in unstable areas is not. I'm not an advocate for plowing the Bay Area. I'm an advocate for building retrofitting and city wide plans in case of an emergency. Because extremes don't work—reasonable compromises do.

Before you jump to crazy propositions like the one UC Berkeley has given, we need to prove that more moderate approaches have failed. Also, we need to learn to love and respect the environment around us. We as humans are not the only inhabitants, and when irreparable damage is done, only we are to blame. It is our duty to protect the earth the best we can. Sustainable development is the way of the future. Just don't make a mistake that our grandchildren will hate us for.

Sincerely,

Lindsay King

From: L M Kronholm
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project website
Date: Friday, May 17, 2013 5:11:31 PM

This has to be the MOST outrageous, bone-headed, destructive, and wasteful project I've ever heard of...and I've heard of a lot of them!!

What is the REAL reason for cutting down 80,000+ trees and native plants and then proceeding to poison the area for decades, if not centuries, to come? Who is behind this and why? I am beside myself with anger that anyone could have even conceived of such an
audacious and atrocious plan. Only the fact that I do not believe that cursing and invective
are an intelligent way to conduct a conversation keeps me from saying what I REALLY think. On the other hand "intelligence" does not seem to enter into this plan.

STOP this catastrophe before it is implemented.

Linda M. Kronholm
North Port, Florida - USA

(and yes...in Florida we know about wildfire...THIS is NOT the way to deal with the perceived threat...)

From: Aaron Cutchin
To: EBH-EIS-FEMA-RIX
Subject: STOP the horrific plan to clear-cut East Bay trees
Date: Friday, May 17, 2013 12:09:03 PM

The dense foliation of the East Bay is one of the most cherished and sacred characteristics of the area. Any plan to significantly deforest it is an insult to our heritage and our culture.

SHAME on any agency that proposes such a narrow-minded and destructive plan for managing fire risk. There must be solutions that do not involve such radical deforestation.

We, the people of the Bay Area, will NOT allow this to happen!

-- Aaron Cutchin
-- aaroncutchin@yahoo.com

From: Adam Frey
To: EBH-EIS-FEMA-RIX
Subject: OPPOSITION
Date: Friday, May 17, 2013 12:13:48 PM

I am a UC Berkeley employee and local resident. I am completely opposed to the plan of clearcutting trees in Claremont and Strawberry Canyon.

From: adamjwall@gmail.com on behalf of Adam Wall
To: EBH-EIS-FEMA-RIX
Subject: Do not clear-cut of 85,000 Berkeley and Oakland trees.
Date: Friday, May 17, 2013 3:47:44 PM

When I heard this week that the federal government would be funding the clear-cutting of 85,000 beautiful Berkeley and Oakland trees, including 22,000 in historic Strawberry and Claremont Canyon, my initial reaction was disbelief. How the feds have money for this destructive project?.. while Head Start and public housing programs are being cut due to the sequester?

The trees in Strawberry and Claremont Canyon have been there for decades and hardly constitute a "hazard." But pouring 1400 gallons of herbicide on the currently pristine hills will create a REAL hazard, and UC Berkeley even plans to use the highly toxic herbicide "Roundup" to squelch the return of non-native vegetation.

Clear cutting trees only adds to the CAUSE and continuance of wildfires in the first place! Topping it with herbicide is the WORST decision you can possibly make.. Why not use all that money to help the land thrive? .. To help the land become lush and keep in and share the waters.. Please, we need to begin planting and caring more for our wildlife to truly prevent disaster relief.

Thank you.

Sincerely,

Adam J. Wall

From: Alice Friedemann
To: EBH-EIS-FEMA-RIX
Subject: I strongly Support the EIS for East Bay Hills
Date: Friday, May 17, 2013 3:30:07 PM

Dear FEMA,

Please approve the wildfire EIS for the East Bay Hills as soon as possible.

My home burned down in the 1991 Oakland firestorm and I would hate to see it happen again!

I am outraged that the 2005-6 FEMA grant hasn't already been implemented.

I would help you cut down eucalyptus for free if that were possible, let me know if there's anything I can do to help.

Alice Friedemann
6198 Contra Costa Road
Oakland, CA 94618
(510) 601-8077

Rockridge Terrace Homeowners Association

From: Amy Stice
To: EBH-EIS-FEMA-RIX
Subject: Support of EIS for East Bay Hills
Date: Friday, May 17, 2013 1:40:55 PM

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term improvements to the native landscape should move forward without delay. We Rockridge Terrace residents know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive. Thank you for supporting this important work. Please approve the EIS as soon as possible.

Support of EIS for East Bay Hills,

Amy Hayes
29 Buena Vista Pl.
Oakland

From: Andrea Lazarin
To: EBH-EIS-FEMA-RIX
Subject: NO FIRE HAZARD
Date: Friday, May 17, 2013 3:30:50 PM

I am writing to voice my dissent with the proposed plan to clear cut trees and poison the land in the name of harm reduction. The threat is not nearly as large as failing to fund public education. This money is better invested in people than destroying habitat and supporting Monsanto products.
Leave Strawberry and Claremont canyons alone.
Andrea Lazarin
Oakland,CA. 94610

From: Anne Cassia
To: EBH-EIS-FEMA-RIX
Subject: clear-cutting in Berkeley/Oakland
Date: Friday, May 17, 2013 4:15:12 PM

As a life-long resident of Oakland, I am dismayed at the plan to cut 85,000 trees in Berkeley and Oakland, especially those in strawberry and Claremont Canyon, near to my home. I understand the desire to reduce fire risk, but clear-cutting creates more of a risk in many ways and there are other methods of reducing fire risk. I have seen the effects of this plan before in part of Claremont Canyon. a beautiful section of woods for the public to enjoy was turned into a barren, strange-smelling, wood-chip filled wasteland.

Please reconsider this plan and save our beautiful East Bay Hills.

Anne Cassia

From: Aram Sohigian
To: EBH-EIS-FEMA-RIX
Subject: Do not cut
Date: Friday, May 17, 2013 1:50:23 PM

Please do not cut those magnificent trees in the canyons. There is a way to be fire safe and not sell out to Monsanto and the other companies that are trying to destroy our eco-system. Please reconsider!

To your health,

Aram Sohigian

From: Betty
To: EBH-EIS-FEMA-RIX
Subject: Destroying the natural habitat of Berkeley and Oakland wildlife
Date: Friday, May 17, 2013 1:21:48 PM

Clearcutting and poisoning the soil in the Berkeley and Oakland hills is not only completely unnecessary, it's murder for countless animals and plants that are native to the Bay Area. Poisoning the ground with pesticides is even worse. Please stop this horrendous abuse of public funds and public space.

Elizabeth Oram

From: Bill Kristy
To: EBH-EIS-FEMA-RIX
Subject: Re: oppose cutting Trees in Berkeley/Oakland
Date: Friday, May 17, 2013 4:45:47 PM

I would like to please amend my input.

I will support the removal of eucalyptus and other non-native trees, IF and only if in their place are planted forests of the redwood trees which covered the East Bay Hills before the arrival of Europeans. Mass tree removal without planting replacement trees is unacceptable for many reasons (climate, recreation, ecosystems, etc), and this is a perfect opportunity to restore redwoods to their ancient place in those hills.

----- Original Message -----
| I very strongly oppose the outrageous plan to chop down trees in
| Berkeley and Oakland and apply herbicide.

From: Bobbi Arduini
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Fire Reduction
Date: Friday, May 17, 2013 12:34:27 PM

To Whom It May Concern,

As a resident of Alameda County, teacher, and hiker, I strongly oppose the destruction of trees in Strawberry and Claremont Canyon and in the Oakland hills. These areas provide a critical resource for residents of Alameda County, both in terms of the environment and for recreation. Using hazardous chemicals to prevent further growth is not in the best health interests of the community. I do not support this action of FEMA or UC Berkeley.

Sincerely,

Bobbi Arduini

Sent from my iPhone

From: Brad Johnson
To: EBH-EIS-FEMA-RIX
Subject: Eat Bay Hills EIR
Date: Friday, May 17, 2013 4:57:21 PM

I am writing in support of the proposed actions to reduce the fuel load in the East Bay hills. As a resident in the Wildcat Canyon wildlands interface, I am acutely aware of my entire neighborhood's need to maintain defensible space around our structures; it is equally necessary for the East Bay Regional Parks to do so as well. I applaud any efforts that encourage them to take action on that count.

Best,

Brad Johnson
Principal
The Crowden School
1475 Rose Street
Berkeley, CA 94702
510.559.6910 ext. 123
bjohnson@crowden.org

From: Bruce
To: EBH-EIS-FEMA-RIX
Subject: east bay hills eis for fire risk reduction
Date: Friday, May 17, 2013 4:44:55 PM

I am a native of northern California, and grew up, and lived as an adult, in this area, spending lots of time both as a student of natural history, and as an amateur naturalist.

The vast majority of the area in question, is covered by natural forest and sagebrush undergrowth, that has had quite literally hundreds of millions of years to evolve and change, doing quite nicely over this entire time, at staying ecologically viable. In addition all of this tree and sagebrush environment has been home to litterally millions of birds and other types of native animals that call this area their home.

To substantially alter this area, as if it were some kind of biological experiment, seems to be both absurd and counter productive, as I seriously doubt human beings have spent nearly the billions of “Man-hours” evolution has spent optimizing a stable and thriving ecological area. It would seem to me to be the height of hubris to assume that some decimation of this regions natural eco-structure would solve anything!

If past such “experiments” have proven anything, it is just how little human beings understand the environment they are tempting to improve... A good example of this would be the widespread removal of non-native species of Eucalyptus trees, after a serious freezing winter storm. It was later determined that almost every single one of the trees in question was neither dead, or dying! If humans were so completely wrong about just one species of non-native plant, I can’t imagine how wrong they will be about a whole host of inter-related species, in this same general area.

All of this says nothing about the substantial change such a damaging an uncalled for alteration of this environment would have on the people who live in this area... including their appreciation for a bit of wildness in their back yards, and inevitably the reduced resale value all properties in the area would eventually incur.

So I strongly suggest that any plans to attempt to substantially alter the environment at both Strawberry and Claremont canyons be scraped as un-wise and foolhardy in the extreme!

sincerely,

bruce blosser

From: Caprice Carter
To: EBH-EIS-FEMA-RIX
Subject: Berkeley Oakland Hills Tree Removal
Date: Friday, May 17, 2013 2:02:27 PM

To whom it may concern,
Please put me on the email list for notifications of meetings and deadlines regarding the removal trees in the Berkeley and Oakland hills.
I am adamantly apposed to such an endeavor and will do everything in our power to stop this faulty project.
Also, to whom do I address a more detailed lett?
Thank-you,
Caprice Cater

From: caremariew@aol.com
To: EBH-EIS-FEMA-RIX
Subject: Tree removal/pesticides
Date: Friday, May 17, 2013 1:49:06 PM

I grew up in the area of Strawberry Canyon. It was an Idyllic childhood. We had trails to roam in and deer were in our backyard. We were surrounded by the beauty of nature which included innumerable trees, which we climbed and built forts in. We lived on University property across from the pools. I object to the removal of these trees which are a huge part of Berkeley.

I also object to a big use of toxic pesticides which I am personally familiar with congenital deformities that they can cause. I strongly oppose this project.

From: Carla Dalton
To: EBH-EIS-FEMA-RIX
Subject: FEMA plan for Hazardous Fire Risk Reduction
Date: Friday, May 17, 2013 1:57:48 PM

Hello,

Am writing to you to express my strong opposition to the plan to clear-cut 80,000+ trees in the Berkeley and Oakland hills. The plan is short-sighted. The solution is worse than the potential problem: i.e., pouring herbicides into the hills is not great...and despite best intentions, this will not be a one-time pouring (because nature spreads seeds and always grows again). The long-term maintenance costs will be great, as will the long term environmental impacts "downstream."

I am a resident of Berkeley, and have for a long long time have been a regular hiker in Strawberry Canyon. It's clear to me that less-lethal and less-extreme approaches could be taken to reduce the risk of fire - and at the same time offer some much-needed summer jobs. This would likely would be less expensive than the proposed plan (which is *not* a one-time fix, though some might hope so).

Please withdraw the plans immediately...and save a lot of money by immediately canceling the EIS effort.

Thank you for your consideration,
Carla Dalton

From: Cooper Walton
To: EBH-EIS-FEMA-RIX
Subject: Claremont Canyon Clear Cut
Date: Friday, May 17, 2013 3:55:36 PM

I have grown up with this wonderful natural Gem practically in my backyard. These natural spaces are incredibly important not only to the ecology of the area and the native species that live here, but to the people of Berkeley, and the city itself. Although I understand the risk of fire as much as anyone having lived through the Blaze in '91 ruining our natural spaces and poisoning our water supply is not the way to do it. I cant express my outrage enough that this plan has not been more publicized let alone that it exists. This atrocity should occur nowhere, especially not in Berkeley.

Cooper Walton, Lifelong Berkeley Resident

From: Daniel Atlas
To: EBH-EIS-FEMA-RIX
Subject: Do not cut 85,000 trees
Date: Friday, May 17, 2013 12:11:30 PM

Hi. I am a resident of Bloomington, IN and im writing demanding that the Strawberry and Claremont Canyon and East Bay trees not be clearcut. They are decades old and have not posed as a fire threat before and will have a devastating impact to the environment if logged, especially if RoundUp is poured on the land. There are unimaginable damages that will be irreversible . Please do not log these trees.

Thanks

Daniel Atlas
1215 N Maple St
Bloomington, IN 47404
812-219-5761

From: David Hall
To: EBH-EIS-FEMA-RIX
Cc: David Hall
Subject: NO earthly reason to clear cut 60,000 trees
Date: Friday, May 17, 2013 1:12:16 PM

Please, let NATURE take its own course.

Don't WASTE air cleansing trees in the name of fire prevention.
This is an absurd notion.

You justify destroying nature at the hands of humans before, at some future unknown time, nature destroys itself?
That's what some group of decision makers came up with?? That's the best use of time and money??

Have government officials lost their minds??
No matter what the studies indicate, no matter what surveys, experts, and others choose to prove as a case,
there can be NO GOOD REASON to cut down trees and replace with RoundUp saturated mulch.

This is not progress. This is a FEMA mass poisoning of our lands, close to home, and just a terrible use of financial resource for an outcome that can only hurt these sacred lands, not benefit.

Please STOP the madness, come to your senses and find other ways to waste tax-payer monies...

Sincerely,

former Berkeleyite

David H. Hall

From: David Stein
To: EBH-EIS-FEMA-RIX
Subject: STOP CLEAR CUTTING OF BERKELEY & OAKLAND TREES!!!!!
Date: Friday, May 17, 2013 3:15:55 PM

This is outrageous!! How dare you chop down miles of forest and pour hazardous chemicals over the entire area. Are you out of yours MINDS!!!???
Where does the government get money for this WASTE???

- -

From: Deborah Lloyd
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyons, Berkeley/Oakland, CA
Date: Friday, May 17, 2013 3:45:38 PM

I just learned about the plan to chop down trees in these canyons as a fire prevention matter. It seems really extreme to me, especially the proposed use of Roundup. There is a lot of wild life in these canyons as well as neighborhood cats. Many people take their dogs here for walks as it is among the few areas where dogs are allowed off leash. It also seems like it would cause erosion, especially if we ever have a rainy year.

Please reconsider this destructive plan. Poisoning the environment because there might some day be a fire is overkill and very concerning to me and my family.

Debbie Lloyd
2333 Grant St.
Berkeley, CA 94703

From: Deirdre Sproul
To: EBH-EIS-FEMA-RIX
Subject: Please do not cut the trees in Strawberry Canyon
Date: Friday, May 17, 2013 4:01:16 PM

To whom it may concern,
Please do not cut the trees in Strawberry Canyon, or the Claremont Canyon. I am a long time resident of Berkeley who loves this town for many reasons one of which are the fantastic trees which give Berkeley it's beauty. Also, I am 100% against the use of any herbicide and or Roundup product. I have 3 children whom I wish to live long and healthy lives. Do not destroy this land. It's been fine for many, many decades and will be fine for many decades to come. I understand that the Eucalyptus may cause problems, and be fire hazards, so if this is your intention, I understand the need for specific cutting- but not the rest.

Berkeley resident who opposes cutting the trees in the canyons.
Thank you for your consideration,
Deirdre Sproul

--
Deirdre Sproul
Client Advisor
Triple Tree
www.TripleTreeKids.com
www.TripleTree.co
415-370-6422
or 209-877-7685

From: Divya Kotwani
To: EBH-EIS-FEMA-RIX
Subject: Please don"t destroy the Berkeley-Oakland Hills
Date: Friday, May 17, 2013 12:44:46 PM

Hello

My name is Divya Kotwani, and I'm a resident of the Bay area since 5 years.

I strongly oppose the destruction of nearly half a million trees! We need them!

Thank you.

From: Douglas Machiz
To: EBH-EIS-FEMA-RIX
Subject: tree clearing objection
Date: Friday, May 17, 2013 2:00:19 PM

Please do not cut any trees down. Please do not poor chemicals into the hills to prevent tree growth. You will make out home less beautiful and create horrible environmental issues, destroying life and polluting our watershed.

Thank you.

From: Eli Delventhal
To: EBH-EIS-FEMA-RIX
Subject: Berkeley Trees
Date: Friday, May 17, 2013 12:58:04 PM

I am a 5-year Berkeley resident, and I want to say up front that I am extremely frustrated with how often UC Berkeley skirts or outright violates local laws simply because it's a state institution. Back in 2008, for example, the University destroyed an oak grove and shell mound that were sacred to the native people, in direct violation of the city of Berkeley's laws. This is saddening that I can live in one of the most forward-thinking cities in the country, and yet our biggest landmark community is able to be so backwards thinking without any consequences.

Seeing as the upcoming proposed destruction of Claremont Canyon is something we *can* actually resist as Berkeley residents, I say that it is all the more important that we do so. It needs to be clear to the University how poor their decisions can be on these matters.

Thanks for your time,
Eli

From: Eric Schneider
To: EBH-EIS-FEMA-RIX
Subject: Clear-cut plan
Date: Friday, May 17, 2013 3:24:40 PM

DO NOT CUT the Strawberry and Claremont Canyon **trees. They haven't caused a hazardous fire for the past 30 years. And you don't know what negative environmental impact this will have.**

DO YOU THINK we can just cut, dam, deforest, and spray all over the earth, wherever we decide, without threatening our lives, our children's, and our grandchildren's. Do you really think that short term?

Or is someone going to secretly make some money off of this?

Eric Schneider

--
We can build a whole spiritual
path on one word: KINDNESS.

From: ersyla
To: EBH-EIS-FEMA-RIX
Subject: the East Bay Hills hazardous fire risk reduction project
Date: Friday, May 17, 2013 1:56:50 PM

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the proposel listed below wouls have desastrus impact on the surrounding nieboorhoods. i am against it and recommend that other envirnemntally sound means be used to safe gaurd against fire

Ersyla nellajoy S. F, CA

the East Bay Hills hazardous fire risk reduction project

The U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) is preparing an Environmental Impact Statement (EIS) on proposed hazardous fire risk reduction activities. The proposed hazardous fire risk reduction activities are in Alameda and Contra Costa counties (in the East Bay Hills of the San Francisco Bay Area) and in the Miller Knox/Shoreline (a facility of the East Bay Regional Park District (EBRPD) on San Francisco Bay).

From: Gabe Fredman
To: EBH-EIS-FEMA-RIX
Subject: East bay tree cutting
Date: Friday, May 17, 2013 2:08:49 PM

To whom it may concern,

As a born and raised, tax paying resident of Berkeley, I find this plan to be a terrible. I would formally submit that you open this issue up to more formal public debate because the major of neighborhood residents are unaware of what is going to transpire.

Thank you for your time,

Gabriel Fredman
2327 Derby st.
Berkeley, Ca
5104095704

Sent from my iPhone

From: Gabriela Frank
To: EBH-EIS-FEMA-RIX
Subject: In opposition to FEMA"s plan to destroy Berkeley/Oakland trees
Date: Friday, May 17, 2013 1:13:50 PM

To Whom it May Concern:

I am writing to express my dismay at FEMA's plan to remove 85,000 trees from Berkeley and Oakland in the state of California. Many of these trees are decades old, and the plan to demolish our natural environment and cover the ground in poison to prevent plants from growing in the cleared areas is horrific. Please do not proceed with this awful plan.

Sincerely,
Dr. Gabriela Lena Frank
Native of Berkeley, current resident of Oakland

From: Gelles R.
To: EBH-EIS-FEMA-RIX
Subject: Tree Removal in Oakland and Berkeley hills
Date: Friday, May 17, 2013 12:24:11 PM

It is with disbelief that I read of the program to remove the trees in the Strawberry and Claremont canyons. This type of removal will destroy the natural beauty which anyone who travels in these areas loves. If there are fire hazards, selective cutting would be an appropriate approach.

To put over a thousand gallons of Roundup insecticide on the ground will contribute to soil sterility. Why on earth would 2 feet deep wood chips be deemed appropriate to avoid erosion - the chips will simply move down the hill and erosion will only be delayed on all hillsides.

As a UCB graduate, I am ashamed that the Forestry Department hasn't come up with a better solution.

Please stop this ill conceived plan to destroy ecologically established habitats - an area enjoyed by thousands yearly and millions over the years.

Kate Gelles

From: Hank Lamb
To: EBH-EIS-FEMA-RIX
Subject: U C Berkeley"s Tree Cutting plan
Date: Friday, May 17, 2013 12:48:07 PM

This is among the stupidist thing I've ever heard. I'm more than certain they have a completely alterior motive, probably a building program.

Even more stupid, is FEMA's involvement. Their real job is disaster preparedness and response. It doesn't include forestry or logging or damaging the environment, which this program clearly does.

Doing a large university's program at national public expense for a plan that destroys habitat amd important ground cover that prevents mudslides amd erosion in two large canyons is purely stupid and a trememdous misuse of taxpayer dollars.

Those trees have been there for decades and serve a tremendous need as well as providing a beautiful setting for students and locals.

The fact that so many have survived those decades without burning down the campus, demonstrates the opposite of a need to cut.

This is the sort of thing that's wrong with our nation and abusive of taxpayers and our environment. Please, cut it out.

Insisting,

Henry Lamb
936-239-0040

From: Heather Fadden
To: EBH-EIS-FEMA-RIX
Subject: Berkeley hills" trees
Date: Friday, May 17, 2013 1:07:19 PM

Please don't cut them all down 8

Sent from my iPhone

From: Heather Fadden
To: EBH-EIS-FEMA-RIX
Subject: Berkeley hills" trees
Date: Friday, May 17, 2013 1:11:13 PM

Berkeley and Oakland appreciate those trees please don't destroy them. Property value would plummet and without the trees those hills will become a slum especially if herbicide roundup poisons the landscape. I used to tell my kids uc Berkeley was a good school but if all those 85,000 trees are senselessly destroyed I will avoid that place like it is a blight on society.

Sent from my iPhone

From: Heather Fadden
To: EBH-EIS-FEMA-RIX
Subject: There is no sense in taking trees away from the east bay hills
Date: Friday, May 17, 2013 1:12:32 PM

Unforgivable unnecessary and evil plans like that are not helping anyone breathe.

Sent from my iPhone

From: Ian Wulfson
To: EBH-EIS-FEMA-RIX
Subject: Fire suppression
Date: Friday, May 17, 2013 12:52:51 PM

I am opposed to the use of herbicides to reduce fuel load. I am for the use labor, goats, controlled burns, and other non-toxic methods to manage non-native vegetation.

Thank you,
Ian Wulfson
Oakland resident

From: Jack Litewka
To: EBH-EIS-FEMA-RIX
Cc: Jack Litewka
Subject: FEMA plan for Hazardous Fire Risk Reduction
Date: Friday, May 17, 2013 1:16:38 PM

Greetings --

I am writing to you to express my strong opposition to the plan to clear-cut 80,000+ trees in the Berkeley and Oakland hills. To say that the plan is short-sighted is an understatement. The solution is worse than the potential problem: e.g., pouring herbicides into the hills is not great...and despite best intentions, this will not be a one-time pouring (because nature spreads seeds and stubbornly regenerates). And the long-term maintenance costs will be great, as will be the environmental impacts "downstream".

I am a resident of Berkeley, and have for almost 50 years enjoyed the beauty of Strawbery Canyon. It's clear to me that less-lethal and less-extreme approaches could be taken to reduce the risk of fire -- and it might result in summer jobs over the long term, which would almost certainly be less expensive than the proposed plan (which is *not* a one-time fix, though some may have such dreams).

Please withdraw the plans immediately...and save a lot of money by immediately canceling the EIS effort.

Regards, Jack

Jack Litewka -- Consultant
jack@jacklitewka.com

From: jameson platt
To: EBH-EIS-FEMA-RIX
Subject: Please dont mess with nature!
Date: Friday, May 17, 2013 12:06:57 PM

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i understand you want to cut down 85000 trees because of fire hazard reasons. they may be a fire hazard but if you cut them down it will cause chain reaction of worse things happening. if you mess with nature to that degree, it will come back to get you. please consider not doin this. the land is beautiful the way it is. we should be preserving it not destroying it.

jameson platt
athens, ohio

From: Jane White
To: EBH-EIS-FEMA-RIX
Subject: Living in a Delicate Balance
Date: Friday, May 17, 2013 3:46:20 PM

To Whom it May Concern:

Please reconsider your proposal to cut down trees and use chemical retardants and other chemical pesticides. We are living in a new era when fire prevention can be achieved without destroying the environment and jeopardizing the health of the inhabitants.

The hills of the East Bay provide necessary emotional, spiritual and recreational opportunities. Please leave them alone.

Sincerely,

Jane White
2014 Rose Street
Berkeley, CA 94709

Jane White
(h) 510-524-2883
(c) 510-205-2245

From: Janet Ramirez
To: EBH-EIS-FEMA-RIX
Subject: Protect Trees in Berkeley and Oakland
Date: Friday, May 17, 2013 4:15:43 PM

Dear FEMA,
I am a native Californian who implores you to preserve the trees that are under attack in both Berkeley and Oakland. I suggest that people are hired to trim away dry brush and beautifying the already wonderful landscape. Furthermore, the use of herbicides on this land is completely uncalled for, and will drastically injure the environment that Northern California is famed for having. This is a bad move. Furthermore, Roundup, has proven to cause cancer. Do you really want to poison your backyard with caner causing agents?

Sincerely,
Janet Ramirez

From: Janette Hartman
To: EBH-EIS-FEMA-RIX
Subject: Strawberry Canyon and Claremont Canyon
Date: Friday, May 17, 2013 2:02:58 PM

Dear FEMA, I am writing to strongly urge that you deny UC Berkeley's proposed clear-cutting of Strawberry and Claremont Canyons, which provide important habitat for wildlife and increasingly rare wild natural space for humans to enjoy. I also strongly advise against allowing the use of Roundup, a chemical that can cause complete mortality of tadpoles at ecologically relevant concentrations.
Please, please, please don't allow this. Janette Hartman

From: Jasmine Fraser
To: EBH-EIS-FEMA-RIX
Subject: REJECT Plans to clear cut 85,000 Berkeley and Oakland Trees!
Date: Friday, May 17, 2013 2:03:46 PM

To Whomever It May Concern,

I'm writing to STRONGLY OPPOSE the proposed clear-felling of trees in the following areas as part of a misguided attempt at fire risk reduction:

- the Alameda and Contra Costa counties (in the East Bay Hills of the San Francisco Bay Area)
- the Miller Knox/Shoreline (a facility of the East Bay Regional Park District (EBRPD) on San Francisco Bay).

To propose pouring 1400 gallons of toxic herbicide including RoundUp to prevent regrowth is beyond criminal...!

What a disgraceful plan... we can live in a barren toxic wasteland but guess what... no fires! I can't believe public money would be spent on such a misguided proposal, and this should be REJECTED IMMEDIATELY!

Regards,

Jasmine Fraser
San Francisco resident and tax payer

From: jcooksey
To: EBH-EIS-FEMA-RIX
Subject: bring it on.
Date: Friday, May 17, 2013 2:24:13 PM

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and good luck with the clear-cutting of the Berkeley and Oakland trees.

-Jonathan Cooksey

From: Jennifer E. Lyon
To: EBH-EIS-FEMA-RIX
Subject: No herbicide please!
Date: Friday, May 17, 2013 2:58:21 PM

To whom it may concern:

As a resident of the Bay Area, I'm writing to express my concern about the plan to cut down these "non-native" trees to reduce fire risks.

I think it may be a good idea in the long run to remove invasive species and simultaneously reduce risks of wildfires. HOWEVER, I'm extremely disturbed by the fact that your plan calls for using tons of herbicides to prevent regrowth.

The herbicides proposed are known to cause severe environmental damage, including death to numerous plants and aquatic species such as frogs, fish and salamanders. Who knows if the native trees could survive in the midst of that volume of herbicides?!

Chipping the non-native trees into mulch in place will quell much regrowth. With some creative management plans that could recruit local community involvement, you could better prevent invasive regrowth. Local community volunteers, including students and elderly, could replant native species and monitor the area for decades to come, removing invasive species if/when they emerge.

Please do not poison our watersheds, vegetation and wildlife with TONS of HERBICIDE!!!

Thank you,
Jennifer Lyon
San Francisco

From: jeremy@missioncommunitymarket.org on behalf of Jeremy Shaw
To: EBH-EIS-FEMA-RIX
Subject: Please stop the deforestation of the Berkeley/Oakland Hills
Date: Friday, May 17, 2013 12:10:41 PM

Hi,

Please do not clearcut ALL of the tall trees in the hills. Consider proposed "species neutral" fire mitigation strategies that would be cheaper, use far fewer herbicides, and would be far more effective in lessening fire risk.

This is not about a strict originalist view of native species in an urban/suburban environment who's historically naturally state will never be 100% restored. The health of humans, health of soil, erosion and monetary costs also should be considered.

Save money, soil and chemicals. Don't deforest.

Thanks!

Jeremy

From: Jess Strange
To: EBH-EIS-FEMA-RIX
Subject: KEEP OUR TREES
Date: Friday, May 17, 2013 12:53:10 PM

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i am opposed to the plan to get rid of our trees in strawberry and claremont canyon. please do not spend our tax money on this.

From: Jewelz Moya
To: EBH-EIS-FEMA-RIX
Subject: Concerned citizen
Date: Friday, May 17, 2013 3:06:12 PM

To Whom It May Concern:

I am opposed to FEMA's hazardous fire risk reduction activities in the East Bay Hills that will wipe out thousands of living trees that provide oxygen and wildlife habitat sanctuary. I read that they are also planning on using Monsanto's toxic 'Round-up' to prevent regrowth. This is sickening, literally. Please do all you can to stop this action. More toxins in our groundwater and devestation of natural habitat is not a good move! This action will have dire consequences on the health of citizens and wildlife in the East Bay.

Sincerely,
Julie Moyer, L.Ac.

From: Jill Valentine
To: EBH-EIS-FEMA-RIX
Subject: Fire reduction plan Berkeley, and Oakland Trees
Date: Friday, May 17, 2013 12:18:32 PM

I am writing with great concern for the fire reduction plan that is scheduled to take place in Berkeley and Oakland, CA. This area that is planned to be clear cut, is a beautiful sanctuary for us, and a habitat for many animals. We need places like this to be healthy both physically and mentally. The logic of removing all potential hazards is impossible. We live in a insecure world, and are always subject to natural disasters. By removing this forest, and spraying pesticides we are compromising the health of our water systems and the local ecosystem, a system we all depend on. We can't continue to take these wild places for granted. This area is part of what makes this area as charming and desirable as it is. We the public DO NOT support your actions and ask you exercise more creativity when trying to solve problems. Forests like this are priceless and invaluable to our community. Please reconsider.
Sincerely, Jill Valentine
Oakland, CA

From: Jillian Saxty
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills clearcut
Date: Friday, May 17, 2013 1:00:29 PM

Dear FEMA and UC Berkeley,

As an Alameda County resident, I am totally opposed to your plan to clear-cut Strawberry and Claremont Canyons and then to dump a highly toxic herbicide on the land which will poison the earth and local streams.

This plan is outrageous and unnecessary! There must be much less destructive means to create a fire break or similar than cutting down decades of native plants, which are becoming scarcer and scarcer in the Bay Area.

Please revise your plan immediately or call it off completely.

Thank you
Jillian Saxty
jillian@firstflight.com
Alameda, CA 94501

From: Judy Scott
To: EBH-EIS-FEMA-RIX
Subject: Strongly Favorable to Eucalyptus Removal in and around Claremont Canyon
Date: Friday, May 17, 2013 1:15:49 PM

I reside adjacent to the Claremont Canyon. I give full support to the fire reduction plan proposed in the subject Environmental Impact Statement. The removal of this inflammable invasive species will provide not only a fire safe environment but allow for replanting of species.

Judith M Scott
751 Alvarado Road Berkeley 94705
510 219 4170

From: Justine Burt
To: EBH-EIS-FEMA-RIX
Subject: PLease don"t cut down the trees in Berkeley and Oakland
Date: Friday, May 17, 2013 12:03:25 PM

We need more trees to fight climate change not fewer. Please don't cut down those trees.

Justine Burt

From: Karin Fisher-Golton
To: EBH-EIS-FEMA-RIX
Subject: yes to trees, no to pesticides
Date: Friday, May 17, 2013 4:50:47 PM

I am gravely concerned about the plan to remove trees in the Strawberry and Claremont canyons and apply wood chips and pesticides.
I grew up in Berkeley and now live in East Richmond Heights. I care about respecting this areas land and all life in it. In addition, as a person with asthma, I am always concerned about the air. Our trees are a great resource, whereas pesticide introduce VOCs to the air and toxins to the land and water. Our area needs less toxins and more trees--not the opposite.

I hope you will not move forward with this destructive project.

Karin Fisher-Golton

From: katrina@katrinadreamer.com on behalf of Katrina Martin
To: EBH-EIS-FEMA-RIX
Subject: Proposed clear-cut of trees
Date: Friday, May 17, 2013 5:01:17 PM

I am writing to express my concern over the plan to clear-cut trees in Strawberry and Claremont canyons. Although I understand that these measures are being taken to prevent wildfires, I believe there will be greater impacts as a result of cutting the trees down.

My first question is what will be the impact to the environment with the removal of these trees? Clear-cutting often destroys the soil and obliterates animal habitats. These risks seem far worse than the threat of a fire. How can we possibly say that human property and even human lives are more important than the lives of the trees and animals that live in the canyons?

Furthermore, I highly oppose the use of Roundup to kill non-native species. I understand that non-native species can be highly invasive, but the health risk to humans and animals with the use of such a toxic substance again seem egregious.

Please reconsider cutting down these trees.

Sincerely,

Katrina Martin
El Cerrito resident

From: Kerry Heffernan
To: EBH-EIS-FEMA-RIX
Subject: Removal of 85,000 trees in Oakland and Berkeley
Date: Friday, May 17, 2013 1:07:40 PM

To Whom it may concern;
I lived through the Oakland Firestorm in 1991 and I remember well what it was like so I do support the removal of some of the trees for safety purposes but I think your analysts have gone too far. 85,000 trees is just crazy! I do not support the deployment of foliage suppressants like “Round Up” either. Those chemicals are horribly destructive. I am a voter and a citizen of the US.

Please reconsider the really very DIRE proposal you have submitted and create a different way of dealing with this very real issue. You don’t have to be so extreme.

Thank you,

Kerry L Heffernan

From: Kevin Hsieh
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 1:58:38 PM

NO to this

From: KIM ROCHOW
To: EBH-EIS-FEMA-RIX
Subject: UC Berkeley
Date: Friday, May 17, 2013 12:47:39 PM

Dear FEMA,
I am writing to strongly urge that you deny UC Berkeley's proposed clear-cutting of Strawberry and Claremont Canyons, which provide important habitat for wildlife and increasingly rare wild natural space for humans to enjoy.
I also strongly apposed to the the use of Roundup, a chemical that can and WILL cause complete mortality of tadpoles at ecologically relevant concentrations.
PLEASE SUPPORT THIS REQUEST,
Kindly,
Kim K. Rochow, MA

From: Kristen Michelson
To: EBH-EIS-FEMA-RIX
Subject: Don"t cut down the trees
Date: Friday, May 17, 2013 2:23:00 PM

Cutting down the trees may solve the fire danger hazard but it creates ancillary problems. Erosion will increase due to lack of vegetation, wildlife won't have protection from predators, and we will lose valuable habitat for many types of animals both invertebrate and vertebrate. Plans to use Roundup to prohibit the regrowth of non-native plants is naive. I used to work for Dow AgroSciences, Roundup is a complete vegetative burndown. It kills both mono and dicots (ie. grasses and trees). It's also highly toxic to higher plant and animal species and will contaminate our groundwater. Instead of cutting down trees, why not create fire breaks instead. Lake Tahoe actively manages their forests through this type of fire prevention. It's time to think outside of the box.

Thanks
Kristen Michelson

From: Leah Shelleda
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project
Date: Friday, May 17, 2013 2:39:54 PM

To Whom It May Concern:

I am neither student nor activist, but a long-time resident of Berkeley speaking on behalf of myself and many others. We are both appalled and deeply, deeply saddened to hear of your
plans to remove 85, 000 trees.

There are other ways to prevent fire besides destroying Strawberry Canyon - a place where
many species rely on the trees, and we Berkeleyans and others enjoy their shade and beauty. We are asking you to respond to the words *preserve respect protect* for other than our own species. We rely on you to do the right thing - but we rely on ourselves to carry our convictions.

Most sincerely,

Leah Shelleda

Leah Shelleda
brbpls@icloud.com

From: Leonard Pitt
To: EBH-EIS-FEMA-RIX
Subject: Are you kidding!
Date: Friday, May 17, 2013 2:40:12 PM

Then aren't the Berkeley/Oakland hills in their entirety a fire hazard?

And Roundup?

What more proof do you need that this massive amount will pose a danger to public health?

Will you be here in the years to come when it is time to explain this disaster?

Sincerely,

Leonard Pitt

From: Linda Champagne
To: EBH-EIS-FEMA-RIX
Subject: Clear-Cutting of Trees in Oakland and Claremont & Strawberry Canyons
Date: Friday, May 17, 2013 4:35:35 PM
Importance: High

Hello:

Clear-cutting acres of trees is wrong! Please do not destroy what I treasure the most in the East Bay. I love our wooded hills – and so do all the wildlife that resides amongst them.

And spraying Roundup – are you serious?! Keep that toxic stuff away from me!

What are your plans to fight erosion & mudslides?

Why not plant fire-resistant barriers to help protect the trees?!
http://www.bewaterwise.com/fire.html

Linda Champagne
Alameda

From: Lorien Smyer
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction projects
Date: Friday, May 17, 2013 12:11:05 PM

While I understand the need to reduce fire hazards, I am strongly opposed to the use of herbicides. Please give strong preference to stump-grinding and the use of goats to eat the foliage. Animals and bees do not need to die from herbicides, please use less toxic methods. Thank you for reading.
Lorien Smyer
5923 Tehama Ave.
Richmond, CA 94804

From: Marina Perricone
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 3:07:02 PM

Dear FEMA,

I am writing to you in reference to the proposed destruction of the Strawberry and Claremont Canyon areas. UC Berkeley has for years claimed that this is necessary for fire protection, yet has not sufficiently proved this to their neighbors or the residents of the area. While a fire may occur and have some impact on the area, it cannot in any way compare to damage to wildlife in the canyon - birds of prey, deer, tree and ground squirrels, etc - by clear cutting and dumping hundreds of gallons of roundup.

I am also blown away that FEMA can spare precious resources on this project when it is clear that more work is desperately needed in New Orleans via Katrina and in Long Island NY via Sandy. Many in the East Bay are becoming more aware of this project due to social media networks. If FEMA and UC Berkeley think that this action will go unnoticed, both are dreadfully mistaken.

Please reconsider the action requested by UC Berkeley.

Thank you,

Marina Perricone

From: Mark Guthrie
To: EBH-EIS-FEMA-RIX
Subject: NO!!!!!!!!!!
Date: Friday, May 17, 2013 4:32:15 PM

"The Federal Emergency Management Agency (FEMA) is moving to chop down 22,000 trees in Berkeley's historic Strawberry and Claremont Canyons and over 60,000 more in Oakland."

NO!!!!!!!!!!

-M Guthrie

From: Max Perel-Slater
To: EBH-EIS-FEMA-RIX
Subject: Planned cutting of trees in Strawberry and Clairmont Canyons
Date: Friday, May 17, 2013 4:08:37 PM

To whom is may concern,

As a Berkeley native I was shocked to hear of the proposed plan to cut down 85,000 trees in the Strawberry and Clairmont Canyons. I am completely opposed to such a project, for the simple reason that strawberry canyon is part of the heritage of Berkeley and the East Bay.

Please expect to see me at the May 18th public hearing.

Max

From: Maxim Shkud
To: EBH-EIS-FEMA-RIX
Subject: I OBJECT Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 4:50:17 PM

This is atrocious!!! Please STOP this madness!

Max Shkud
743B Portola St
San Francisco

From: Maya E
To: EBH-EIS-FEMA-RIX
Subject: Unnecessary clearing of trees
Date: Friday, May 17, 2013 1:17:15 PM

To Whom it May Concern,

Please reconsider your plan to clear the trees in Strawberry and Claremont Canyon. These trees help make up a beautiful, native natural oasis in the midst of urban living. The resources needed for a clearing project like this could be better allocated towards something more worthwhile. Additionally, the proposed plan to use herbicides, roundup and other toxic chemicals has no place on land that is hiked, foraged, and enjoyed daily by people, dogs, and numerous other native species.

Thank you,
Maya
Oakland Resident

From: Michael Aaberg
To: EBH-EIS-FEMA-RIX
Subject: Clear cutting Oakland and Berkeley
Date: Friday, May 17, 2013 1:03:57 PM

Hello,
As a life time resident of Oakland and Berkeley I would implore you not to clear cut these trees!!

Michael Aaberg
Tigers Milk Music
Oakland CA.

From: michael chulada
To: EBH-EIS-FEMA-RIX
Subject: cutting down of trees
Date: Friday, May 17, 2013 2:57:29 PM

Please do not go ahead with your proposed tree cutting. It is pointless, and worse for the environment. I urge you to rethink your decision.
Michael Chulada

From: Michelle Pond
To: EBH-EIS-FEMA-RIX
Subject: DO NOT CUT TREES PLEASE
Date: Friday, May 17, 2013 2:33:23 PM

I am reaching out to FEMA – please don't ruin the natural beauty of that area buy cutting down these trees…

"The Federal Emergency Management Agency (FEMA) is moving to chop down 22,000 trees in Berkeley's historic Strawberry and Claremont Canyons and over 60,000 more in Oakland"

Michelle Pond
OFFICE MANAGER

Altius Education
101 Spear Street Ste 203
San Francisco, CA 94105
phone 415 762 1505
mobile 415 794 2000
fax 415 979 9017
www.AltiusEd.com

From: Mickey Green
To: EBH-EIS-FEMA-RIX
Subject: Tree cutting
Date: Friday, May 17, 2013 3:16:55 PM

Sent from my iPad
Mickey

This one of the most dumb things a University & Federal Gov. can do. Round up is a very dangerous herbicide. Do not think those wood chips 2 feet deep won't burn in a fire. Come folks get your head out of the wood chips. DO NOT CUT THE TREES!
Thanks,
Mickey Green

From: moonshadow
To: EBH-EIS-FEMA-RIX
Subject: Destruction of trees unnecessily
Date: Friday, May 17, 2013 12:16:26 PM

To whom it may concern:

I am writing to urge you to stop your plan to destroy 85,000 Berkeley and Oakland trees in the Strawberry and Claremont canyon. The destruction of these beautiful trees is not necessary and would diminish the beauty of this area. When I lived in California, I often visited the San Francisco area and enjoyed the beauty of this natural area. Please allow these trees to continue to flourish and allow people who visit here to enjoy the serenity of this majestic natural treasure. You are supposed to protect our environment, not wantonly destroy it.

Diane Alpern
DAlpern702@aol.com

From: Morgan Greer
To: EBH-EIS-FEMA-RIX
Subject: Unacceptable Destruction
Date: Friday, May 17, 2013 2:17:26 PM

To Whom it May Concern,

I have recently learned of your plans to tear down the bucolic Strawberry and Claremont Canyon areas and replace them with what can only be described as a chemical wasteland. This is alarming to me and I am sure many others, in more than one way.

Firstly, I am immensely disappointed by UC Berkley. I had always heard of this school being intellectual, progressive, environmentally conscious and the like. I had dreamed of attending this school someday and that dream has swiftly died, since this is not the school I thought it was.

Secondly, the absolute disregard for nature is reprehensible. The trees posing as a "fire hazard" is not a legitimate reason. If that were cause to destroy a forest, how is it that any are standing? Any forest or tree is a fire hazard. To go by this logic is to begin the decent down the slippery slope of regarding all plants are a hazard to people rather than a help.

Without these 'fire hazards' there would be less oxygen and a vacuum of natural habitat for the thousands of creatures who depend on forests for their homes, whose destruction is imminent if their habitat is to be so callously disregarded. Even if one is not concerned with the lives of these critters, their deaths will reach around to effect humans, as all ecosystems are connected.

And I'm sure the reader does not live under a rock and is well aware of the threat pesticides are posing to the environment. To name a few problems, cancer, ad/hd, colony collapse disorder, and many others.

Gentleman (and ladies) this cannot happen. These oxygen creating life giving entities cannot be hacked down to make way for a wasteland of potential splinters and life stealing chemicals.

Please, for everyone future, the animals, the currently living and the growing; the future generations, do not do this. Don't pave the way for the destruction soon to follow this example. Don't create this black mark on the record of your school and lose many other potential students like myself. And the proverbial black mark the wasteland you have proposed to create will leave behind.

Sincerely,

A one time UC Berkley Hopeful, who is now hopeful to see those forests remain standing.

From: Nina Sawant
To: EBH-EIS-FEMA-RIX
Subject: Berkeley/Oakland tree clearing
Date: Friday, May 17, 2013 1:01:28 PM

Please do not clear these beautiful trees! There must be less destructive ways to deal with a fire hazard than simple, barbaric destruction.

Oakland resident,
Nina sawant

From: Proper Pseudonym
To: EBH-EIS-FEMA-RIX
Subject: RE: Berkeley Clearcut
Date: Friday, May 17, 2013 1:01:40 PM

Hi there,

I am a resident of Berkeley California, and I just wanted to give some feedback real quickly on the subject of the the planned tree removal in the strawberry and claremont canyon on the grounds that the present trees represent a potent fire hazard.

No.

I do not support this. Please intervente. I do not want thousands of gallons of pesticides (roundup) being sprayed anywhere near my home, nor do I want to loose the beautiful hiking trails and tree studded scenery in the area.

Again, I request an intervention. This should not go on. I will attach both the article which referred me, and your own website.

Thank you kindly for the consideration. I feel extremely strongly about this.

~David Alden – long term Berkeley resident

http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees

http://ebheis.cdmims.com/Home.aspx

From: Rachel E Holmen
To: EBH-EIS-FEMA-RIX
Cc: Rachel E Holmen
Subject: Erosion, pesticide use, loss of habitat
Date: Friday, May 17, 2013 4:09:35 PM

I oppose the current EIS to cut trees in Strawberry Canyon and Claremont Canyon, and to use herbicides to prevent new growth. We don't need the chemicals in our streams, and there will be a terrible loss of habitat for frogs, squirrels, deer, rabbits, birds, and other living creatures in these canyons. The soil will erode, and precious topsoil will wash into the bay.

-- Rachel Holmen, registered voter, Berkeley

From: Rebekah
To: EBH-EIS-FEMA-RIX
Subject: Proposed plan for Strawberry Creek Canyon and Clairemont Canyon
Date: Friday, May 17, 2013 3:44:51 PM

To Whom it May Concern,

As a resident of Berkely, I find this plan to elimate so many trees and to introduce toxic substances(pesticides) to be unacceptable on so many levels. These are some of the most beautiful places in the area, and to take that away will greatly reduce the value of the place. It will also take away habitat for the animals that reside there. These are also cherished locations, places that many go to escape the hustle and bustle of urban life, and it would be a shame and a travesty to destroy this. I am shocked this is being proposed with so little time for public comment and am vehemently opposed to these proposed actions. I strongly urge the powers-that-be to reconsider removing so many trees and introducing pesticides, and look for alternate methods for fire control.

Rebekah Ekberg
Berkeley, CA

From: renee mcclain
To: EBH-EIS-FEMA-RIX
Subject: Trees
Date: Friday, May 17, 2013 3:19:32 PM

Dear sirs, It's one thing to chop down trees, quite another to dump toxic chemicals all over the area. Please don't do that. And I wonder if there are people who can offer a different approach, a different view. People in Berkely. This is a community thing not just a FEMA thing. Good Lord!

From: Robyn Duffy
To: EBH-EIS-FEMA-RIX
Subject: DONT CUT THE TREES!
Date: Friday, May 17, 2013 1:56:59 PM

Good Afternoon,

Please consider this email my direct opposition to cutting down trees in Strawberry or Claremont Canyon. I take walks there 2-3 times a week. It is a magical place where one can escape the city. The trees there add to air quality, wildlife, and beauty.

STOP THIS PLAN!!!!

Robyn Duffy
Alameda County Resident

From: Sarah Kurtz
To: EBH-EIS-FEMA-RIX
Subject: FEMA"S east bay hills clear cutting
Date: Friday, May 17, 2013 3:37:03 PM

To Whom it concerns.
As an east bay hills home owner I have to voice my objection to this clear cutting plan!
I live close to the line where the last Oakland hills fire was stopped. So I am not unfamiliar with wild fires. The real hazard to me is pouring 1400 gallons of herbicide on the currently pristine hills. I do not want "Roundup" anywhere near me and find it horrifying that it would be used this way.
I understand the fire risk but feel the beauty and land stabilizing function of the tree's far out ways the risk. I doubt having bare hills would stop a wind whipped fire from burning houses anyway. I think the trees are of greater value, even if they are non-native. I think it's more than a waste of money to go ahead with this plan!
Thank you for your consideration
Sarah Kurtz

Sarah Kurtz
5809 Florence Ter.
Oakland,Ca 94611
H:510-652-0129
Cell:510-326-6950
sarahck@comcast.net

From: sariel
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 4:40:19 PM

I am a resident of the East Bay and I do NOT support this plan.

Stephanie Ariel
Berkeley, CA

From: Sean McCormick
To: EBH-EIS-FEMA-RIX
Subject: Use of herbicides in public lands in Oakland
Date: Friday, May 17, 2013 12:22:50 PM

While I believe that the fuel reduction program aimed at eradicating non-native species in the Oakland hills, I strongly object to the spraying of any herbicides in the Oakland hills as part of this fire reduction, especially Roundup. Please find a way to do this without dumping herbicides all over our parks.

-S

Sean McCormick
Director of Engineering, Measurement & Insights
Quantcast

From: Seth Rosenberg
To: EBH-EIS-FEMA-RIX
Subject: TERRIBLE
Date: Friday, May 17, 2013 4:38:46 PM

Hi,

As a life-long resident of the Claremont area in Oakland, I am horrified by this project. PLEASE PLEASE PLEASE do NOT cut down these trees and definitely do NOT use herbicide on our soil!!!!

Several reasons why I strongly oppose this project:

* These projects are more likely to **increase the risk of wildfires** than to reduce that risk.

By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will **damage the environment** by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will **endanger the public** by dousing our public lands with thousands of gallons of toxic herbicides.

* **Erosion** is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* **Non-native vegetation** such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* **Prescribed burns** will pollute the air and contribute to the risk of wildfire, endangering lives and property.

* These projects are an **inappropriate use of the limited resources** of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

Seth Rosenberg
MBA/MPA in Sustainable Management, 2015
Presidio Graduate School
C: 510.599.8575

From: Shane Sischo
To: EBH-EIS-FEMA-RIX
Subject: Canyon clearing
Date: Friday, May 17, 2013 12:28:12 PM

Hello. I am citizen of Oakland and the Bay Area. As it stands it has come to my attention that you may soon commit a travesty upon the hills and in strawberry canyon as well as clairemont. This can go unheard. What you plan to do is introduce a large amount of toxic chemical into a pristine environment . Why? Why would this be a good idea.?

Please contact me back as I would like to know more about this situation. This is my community as much as its yours.

Shane Sischo
510-435-7086

Nothing lasts, but nothing is lost.
Blake

From: Sharon Heath
To: EBH-EIS-FEMA-RIX
Subject: Regarding FEMA Plans to Clear-Cut 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 1:12:40 PM

As a resident of this state, I demand you rescind your plan to clear cut these venerable trees for the following reasons:

* These projects are more likely to increase the risk of wildfires than to reduce that risk.
By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will damage the environment by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will endanger the public by dousing our public lands with thousands of gallons of toxic herbicides.

* Erosion is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* Non-native vegetation such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* Prescribed burns will pollute the air and contribute to the

risk of wildfire, endangering lives and property.

* These projects are an inappropriate use of the limited resources of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

Sincerely,

Sharon Heath

From: Stephan Hawk
To: EBH-EIS-FEMA-RIX
Subject: Clear Cutting East Bay
Date: Friday, May 17, 2013 4:55:25 PM

Stop. You have no right to use our tax dollars like this. This is unacceptable.

--
Stephan Hawk
stephanhawk.com
510-283-1300

From: Stephanie Bruce
To: EBH-EIS-FEMA-RIX
Subject: tree cutting in Berkeley and Oakland
Date: Friday, May 17, 2013 11:57:52 AM

To whom it may concern

As a resident of Berkeley for more than 20 years, I find the plan to remove the trees from Strawberry and Claremont Canyons to be a criminal act against the people and landscape and future of this area. It's hard to imagine that human beings in a position of power can make decisions like this that are so completely anti-life. Do you not have grandchildren? Please reconsider this drastic, foolish. plan to cover the ground with wood chips and chemicals in place of the beautiful gift from the Earth that is the trees, and other foliage in these canyons.

Sincerely,
Stephanie Bruce

From: soulpiercing@gmail.com on behalf of Stephen Thompson
To: EBH-EIS-FEMA-RIX
Subject: Berkeley/Oakland Trees
Date: Friday, May 17, 2013 1:09:18 PM

Hello,

I was shocked to find out there was a plan to cut down so many trees in the Berkeley/Oakland hills and even more shocked that a community in this area would allow the wholesale use of herbicides like Roundup. This sounds like very poor planning, even if there is any validity to the risk of fires.

As a resident of Berkeley, I am adamantly against any measures, including this one, that put our green spaces at risk. I spend many weekends with my stepson hiking in and around Claremont canyon. The last thing we need in an already polluted environment is for herbicides to wash down into our neighborhoods. These precious areas need to be preserved, not clear cut!

thank you,
Stephen Thompson

From: Stern, Lise S.
To: EBH-EIS-FEMA-RIX
Subject: Public Comment re: FEMA tree cutting/Berkeley/Oakland
Date: Friday, May 17, 2013 1:00:56 PM

To Whom It May Concern:

I am writing as a public citizen of the East Bay that I am strongly opposed to the clear cutting of thousands of trees in the Berkeley and Oakland Hills, including Stawberry and Clarmont Canyons; as well as the use of pesticides to control the spread of non-native plants. These canyons provide much needed green space for the urban areas around them and are much loved by the community. They are no more a fire hazard than all of the rest of our beloved park land. Given the trend towards climate change we should be planting more trees, not cutting thousands down. And we do not need to add to the environmental toxins already surrounding us with thousands of gallons of herbicide (Round up). This is a public health risk.

I oppose this project in the strongest terms. Do not do this.

Lise Stern, MFT
Mental Health Clinician
Solano County Mental Health

Home) 1502 Laurel Avenue
Richmond, CA 94805

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From: Stern, Lise S.
To: EBH-EIS-FEMA-RIX
Subject: follow up public comment
Date: Friday, May 17, 2013 1:15:34 PM

To Whom It May Concern

This is a follow up to my previous public comment. I strongly oppose the use of my tax dollars to cut down trees on (presumably) "my" public lands. I can understand and support the thinning of some nonnative trees, for fire safety, but this project is too extreme in that it does not take into account soil erosion and hill slides, how these trees function as wind breaks which slow down the winds in other fires, or the impact of baron land on the ecosystem. Not having an affirmative plan for the replanting of California natives is foolhardy in a project of such scope. The more likely scenario is for the invasive non-natives to move in and populate the empty space, requiring the use of ever more herbicide's, at even greater public health risk. When the government is cutting so many much needed programs, why is this being funded when it is so poorly planned. If the government is so worried about fire risk, why not fund the eradication of many acres of parkland of the non-native plants in so many of the park lands. They are overgrown with weeds from neglect, due to lack of funding. Why not start there?

I do not support the clear cutting of these forest canyons. Do not do this.

Lise Stern, MFT
Mental Health Clinician
Solano County Mental Health
FACT Program
707-784-2099
Fax: 707-427-2981

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From: Steven Zegas
To: EBH-EIS-FEMA-RIX
Subject: OPPOSITION to Clear-Cut Plan in Berkeley
Date: Friday, May 17, 2013 12:15:40 PM

As a resident in the Oakland / East Area for 25 years, I firmly oppose the plans to clear trees in the East Bay Hills. These areas are a vital natural resource and part of the resounding beauty of the Bay Area.

A clear-cut plan is an ABOMINATION.

Please DO NOT cut down 85,000 beautiful Berkeley and Oakland trees, including 22,000 in historic Strawberry and Claremont Canyon.

How on EARTH can anyone come up with a CRAZY idea like this?

We need vegetation for the environment - air quality and human appreciation**. We DO NOT need acres of wood chips and thousands of gallons of toxic RoundUp poured into our ground.**

OPPOSE and Stop this PLAN!!

Steven Zegas
Encinal Ave
Alameda CA
94501

From: suesusan@comcast.net
To: EBH-EIS-FEMA-RIX
Subject: FEMA East Bay Hills Fire Mitigation Project
Date: Friday, May 17, 2013 3:54:51 PM

Re: Support of EIS for East Bay Hills

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term improvements to the native landscape should move forward without delay. We Rockridge Terrace (Oakland) residents know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive. Thank you for supporting this important work. Please approve the EIS as soon as possible.

Susan Feinstein
6181 Contra Costa Rd
Oakland, CA 94618

From: Susan Silber
To: EBH-EIS-FEMA-RIX
Subject: Public comment for tree cutting
Date: Friday, May 17, 2013 12:56:17 PM

Please do not cut down trees using herbicides! What is going on here??!!

--

Susan Silber, Consultant

Project Coordinator, Green Star Schools Program
Green Schools Initiative

From: The Guynns
To: EBH-EIS-FEMA-RIX
Subject: Plan to cut down beautiful trees in Berkeley, CA
Date: Friday, May 17, 2013 1:49:19 PM

FEMA,

We are absolutely horrified to learn of your plan to cut down thousand and thousands of beautiful trees in our community. There is no justification for this. This seems to be happening in secret. Please understand we are outraged, and so many others would be too if they knew of your plan.

Please rethink this fatal step. Please let us know that you will not go ahead.

Stefanie and William Guynn
Berkeley, CA

From: Thryn Murráy
To: EBH-EIS-FEMA-RIX
Subject: Halt the land clearing!
Date: Friday, May 17, 2013 2:30:22 PM

Absolutely do not go forward with plans to clearcut the Strawberry and Claremont Canyons. These trees provide far more beneficial ecosystem services, like cooling, attracting moisture, and providing beauty, oxygen and habitat.

Do not use Round up on this land, it is an extremely hazardous toxic pollution.

The proposed management is extremely misguided and very irresponsible destruction, and would cause far great ecological harm. The loss of this forest would be a great impoverishment to all the surrounding communities. Leave these trees alone!!

Kathryn Murray, Natural Areas Manager

From: Tim Mack
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 2:26:50 PM

Shame on you for destroying out forests! Do you suppose we cut down all trees since they "pose a fire hazard" what a bunch of bull. Please know, as a resident of California, and planet earth I do not support this plan.

Timothy Mack

From: Tom Ferguson
To: EBH-EIS-FEMA-RIX
Subject: Berkeley and Oakland clear cutting
Date: Friday, May 17, 2013 1:31:57 PM

PLEASE PLEASE DON"T DO THIS. I'm an Oakland resident who works in Berkeley and I do not want this to happen to our local nature.

-Tom Ferguson

From: VICKI RANDLE
To: EBH-EIS-FEMA-RIX
Subject: Cutting 22,000 trees in Strawberry and Claremont Canyons and over 60,000 more in Oakland
Date: Friday, May 17, 2013 11:56:11 AM

This is a complete outrage! I spend and have spent countless hours in those canyons and am astonished that anyone thinks the answer to fire danger in these canyons is to clear cut these trees then put down a known toxic chemical to prevent regrowth.
This is completely unacceptable.
Please reconsider this terrible idea and work with the community for other less destructive and toxic options to fire abatement.

Sincerely Vicki Randle

Sent from my iPad

From: wmcecka@comcast.net
To: EBH-EIS-FEMA-RIX
Subject: Oppose Cutting of Eucalyptus Trees in non-Residential Areas
Date: Friday, May 17, 2013 2:06:36 PM

At what point to invasives become endemic? I think removing these trees, other than in residential areas, destroys a nearly centuries old ecosystem for the idealistic, unrealistic, and unsustainable vision of environmental puritanism. What of other invasive species, including early ripening non-native grasses, thistle, etc. do we to the eradication list, and how will we pay for the vigilance necessary to maintain a California pure ecosystem?

We have so many other pressing needs for precious resources, including enforcement of defensible spaces around our homes for fire protection. Take a walk right now through our neighborhood and you will see that fire suppression extends far beyond killing eucalyptis trees.

I do not support this effort.

From: Yanira Wong
To: EBH-EIS-FEMA-RIX
Subject: Support of EIS for East Bay Hills
Date: Friday, May 17, 2013 4:50:06 PM

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills. I believe the EIS findings of improved fire safety and likely long-term improvements to the native landscape should move forward without delay. As an Upper Rockridge resident living in a home that was rebuilt after the Oakland fires, I know only too well that, when ignited, the eucalyptus canopy can spread wildfire dramatically during our windy fire season. We should remove invasive trees and discourage re-growth and weeds so that native vegetation can thrive.

Thank you for supporting this important work. Please approve the EIS as soon as possible.

Yanira Wong
6151 Buena Vista Ave.
Oakland, CA 94618

From: Andie Grace
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills fire risk reduction
Date: Friday, May 17, 2013 10:07:36 AM

Thank you for this opportunity to comment. I cannot be there in person for a public meeting but do not support this plan to clearcut and spray Strawberry and Claremont Canyons with herbicides.

There MUST be some other way. Please do not clearcut this area and spray it with Roundup! You're talking about Berkeley, a city where many residents go to great lengths to avoid such toxins, and I do not think our community will stand for such exposure and risk.

I support uprooting and removing non native eucalyptus, and other reasonable fire prevention measures, but not the total toxification of the land and destruction of these two natural areas. Living against these areas is taking a certain risk of wildfires, but I think they can be controlled in other ways, and are a fact of life unless we're going to just pave the entire planet.

It'll be more work to only remove the invasives, but it's more on balance as a fairer approach to our living this close to nature.

-Andrea Grace
2729 Acton Street
Berkeley, CA 94702

From: Ben Blumgart
To: EBH-EIS-FEMA-RIX
Subject: IN OPPOSITION TO East Bay Hills hazardous fire risk reduction project
Date: Friday, May 17, 2013 11:39:14 AM

To whom it may concern:

I am writing to express my absolute opposition to the proposed project for clear-cutting trees in the Claremont and Strawberry canyons and surrounding areas, and of altering the landscape with groundcover and the application of herbicides. This would be a horrible travesty and needlessly destructive of an area that has stood in the same condition for generations.

I grew up in the area, and for myself and countless others the beauty and peacefulness afforded by these relatively untouched cul-de-sacs is what first taught us respect and appreciation for the East Bay's wonderful wooded hills. DO NOT DO THIS. YOU WOULD BE STEALING FROM HUMANITY AND FROM THE PLANET.

Sincerely,
Ben

Ben Blumgart
Sales Manager
Rentals & Czech-Ease
David Gage String Instruments
(212) 274-1322 ext 233
benblumgart@davidgage.com

From: kissadayo@gmail.com on behalf of Caitlin S. Cotter
To: EBH-EIS-FEMA-RIX
Subject: tree clear cutting
Date: Friday, May 17, 2013 10:52:13 AM

To whom it may concern,

I was recently appalled to hear of a plan to clear cut trees in the Strawberry and Claremont Canyon area. As a Berkeley Resident I am deeply opposed to this plan, both as someone who appreciates the natural beauty of the area and as someone who understands the ecological affects of this decision. I urge you to leave the trees where they are, and to avoid the use of toxic herbicides. This action under consideration is neither wise, prudent, appropriate, or considerate of the citizens of Berkeley.

Thank you.

Yours sincerely,
Caitlin S. Cotter

From: deanne quenzel
To: EBH-EIS-FEMA-RIX; EBH-EIS-FEMA-RIX
Date: Friday, May 17, 2013 10:00:37 AM

To whom it may concern,

I understand the need to remove some of the trees in the Berkeley and Oakland hills. The Eucalyptus is non native and a fire hazard. This I understand. What I don't understand is the intent to use powerful Herbicides to sterilize the hill. Have you no sense? Why not remove the Eucalyptus and plant Native Redwoods? I am also dismayed by the secrecy and scheming behind this. This is a very sad time for Americans and all mankind. I am tired of the Bureaucracy and dictatorship our government imposes on it's people and land.

Deanne Vargas

From: Diana Shapiro
To: EBH-EIS-FEMA-RIX
Subject: Please don"t
Date: Friday, May 17, 2013 10:18:47 AM

Hello. I am a Berkeley resident and am very concerned about the current proposal of cutting down so many of our wonderful trees. Please remember that trees don't usually cause fires but they ALWAYS provide us with clean air that keeps us healthy and alive. We need those trees. Please leave them be.

Sincerely,
Diana Shapiro
2212 Browning St.
Berkeley CA 94702

Sent from my iPad

From: Ellen Gierson
To: EBH-EIS-FEMA-RIX
Subject: subscribe
Date: Friday, May 17, 2013 10:13:00 AM

From: inanesavoir@gmail.com on behalf of Ivonne Arias
To: EBH-EIS-FEMA-RIX
Subject: Deforestation of Strawberry and Claremont Canyons
Date: Friday, May 17, 2013 9:54:58 AM

Dear FEMA,

I write on behalf of myself and anyone who has ever tread the soil in Strawberry and Claremont Canyons to please reconsider these sanctuaries' deforestation. The prevenative deforestation and dousing of the land in herbicide will do more harm than good and is likely to adversely affect the East Bay area's water supply. I urge you to reconsider as well because as a UC Berkeley graduate, I know first-hand of the imperceptible beauty this area offers. Without cost.

Please don't destroy this area. It keeps us all sane here!

Yours,
Ivonne Arias

--
Ivonne Arias
BA English, French minor 2012
University of California Berkeley

From: Janet Jacobson
To: EBH-EIS-FEMA-RIX
Subject: FEMA"S Plan for our trees
Date: Friday, May 17, 2013 9:54:10 AM

NO, PLEASE, NO! I can't believe this is going to happen. There will be protests, I among them. STOP THIS PLAN, PLEASE.

From: Jason Victor Serinus
To: EBH-EIS-FEMA-RIX
Subject: Please do not destroy trees in the East Bay Hills
Date: Friday, May 17, 2013 10:03:58 AM

Re:

This is an absolutely horrible plan: destroying one of the great nature preserves in the East Bay Hills, replacing trees with wood chips, and poisoning all living things with Roundup. I strongly oppose this action.

jason victor serinus
Oakland, CA

Jason Victor Serinus • http://www.jasonserinus.com
Music and audiophile critic, Whistler Extraordinaire, and co-convener Oakland Community Policing Task Force
The Voice of Woodstock • The Pavarotti of Pucker

From: Jokia Mccall
To: EBH-EIS-FEMA-RIX
Subject: DON"T CUT THE TREES!!
Date: Friday, May 17, 2013 10:33:24 AM

PLEASE do not destory the trees in oakland and berkeley! It makes our community beautiful! I do not agree with this action!!!!! PLEASE DO NOT CUT THE TREES!

Jokia McCall
Administrative Assistant
Best Value Home Improvements
510-444-5903

From: Katherine Monahan
To: EBH-EIS-FEMA-RIX
Subject: FEMA "fire hazard reduction" NO!!!!
Date: Friday, May 17, 2013 11:45:15 AM

Hello,

As a trained wildlands firefighter, I am familiar with the management techniques of wildland fires. Clear-cutting is not one of them. I could potentially support implementing a permanent firebreak of the standard size: about the width of a road. Cutting more than that is unnecessarily destructive, and destroys natural heritage which belongs to our children. Applying herbicide is likewise completely unrelated to standard, approved wildlands fire management, and presents unknown environmental dangers. I recommend consulting the county fire department for their recommendations, which based on my experience, will likely consist of bringing out a CCC or convict crew to cut a firebreak seasonally.

My family and I STRONGLY OPPOSE the current plan.

Katherine Monahan
Berkeley resident

From: Kathryn Roszak
To: EBH-EIS-FEMA-RIX
Subject: Tree removal
Date: Friday, May 17, 2013 10:05:20 AM

As a tax payer, these plans to remove trees need more study. The herbicides and the large areas of wood chips are of concern. Not to mention the lack of green as these areas are not planned for re planting. Native species won't grow there in the environment this creates. It seems a vast waste of resources and manpower. This needs more public review.

Response requested.

Kathryn Roszak

From: Kerry Kriger
To: EBH-EIS-FEMA-RIX
Cc: Gilbert Adum; Annie Organ
Subject: Do not allow Strawberry and Claremont Canyon proposed clear cutting
Date: Friday, May 17, 2013 10:58:43 AM

Dear FEMA,
As a professional biologist with 15+ years experience in wildlife conservation, I am writing to strongly urge that you deny UC Berkeley's proposed clear-cutting of Strawberry and Claremont Canyon, which provide important habitat for wildlife and increasingly rare wild natural space for humans to enjoy. I also strongly advise against allowing the use of Roundup, a chemical that can cause complete mortality of tadpoles at ecologically relevant concentrations.

Thank you and lease confirm receipt of this message.
Dr. Kerry Kriger
Save The Frogs - Founder, Executive Director, Ecologist
www.savethefrogs.com
www.savethefrogs.com/kerry-kriger
kerry@savethefrogs.com
831-621-6215 (Office)
Santa Cruz, CA 95060

Save The Frogs is the world's leading amphibian conservation organization. We work in California, across the USA, and around the world to prevent the extinction of amphibians, and to create a better planet for humans and wildlife.

The International Day of Pesticide Action is October 12th, 2013:
http://savethefrogs.com/action

The 6th Annual Save The Frogs Day is April 26th, 2014:
http://savethefrogs.com/day

On Fri, May 17, 2013 at 10:21 AM, Annie Organ <annieorgan@att.net> wrote:
> Hi, Kerry and Gilbert:
>
> I thought you would find this article important. It's about a sneaky, likely
> and imminent major tree-cutting pending up in the UC hills, which will
> involve the use of massive amounts of Round-up along the creek. (Score: FEMA
> 22K - frogs 0)
>
> http://www.beyondchron.org/news/index.php?itemid=11361
>
>
>
> Thank you,
>
> Annie Organ
>
>
>
> _____
> From: Kerry Kriger <kerry@savethefrogs.com>
> To: Michael G. Starkey <starkey@savethefrogs.com>; Gilbert Adum
> <gilbert@savethefrogs.com>

> Sent: Sat, April 27, 2013 6:15:55 AM
> Subject: Thank you on behalf of Save The Frogs Ghana
>
> Hi and happy Save The Frogs Day,
> Thanks to your support and that of 51 other donors, we have raised
> $2,600 for Ghana's Save The Frogs Day events since I sent yesterday's
> email!
> The events will go as planned! We expect to raise a significant amount
> of awareness for the togo Slippery Frog and the Atewa Hills National
> Park we are working hard to create. I have added your name to the
> thank you list at www.savethefrogs.com/ghana#thanks
> Have a wonderful Save The Frogs Day!
> www.savethefrogs.com/ghana
> www.savethefrogs.com.day/2013
> Kerry
>
> **********
> Dr. Kerry Kriger
> Save The Frogs - Founder, Executive Director, Ecologist
> www.savethefrogs.com
> www.savethefrogs.com/kerry-kriger
>
> 303 Potrero Street #51
> Santa Cruz, CA 95060 USA
> kerry@savethefrogs.com
> 831-621-6215 (Office)
>
> Save The Frogs is the world's leading amphibian conservation
> organization. We work in California, across the USA, and around the
> world to prevent the extinction of amphibians, and to create a better
> planet for humans and wildlife.
>
> The 5th Annual Save The Frogs Day is April 27th, 2013 -- Get involved!
> http://savethefrogs.com/day

From: Kester Allen
To: EBH-EIS-FEMA-RIX
Subject: Please don"t cut down the trees in Strawberry and Claremont Canyon
Date: Friday, May 17, 2013 9:17:14 AM

Please don't cut down the trees in Strawberry and Claremont Canyon.

Kester Allen

From: laurel@loloro.com
To: EBH-EIS-FEMA-RIX
Subject: (EIS) on proposed hazardous fire risk reduction activities in the East Bay Hills
Date: Friday, May 17, 2013 11:27:00 AM

To Whom It May Concern,

After reading about the proposed plan for tree removal and fire barrier in the East Bay, I'd like to suggest that a stronger focus be given to protection and restoration of native trees and shrubs as part of the project. While pyrophytic non-natives are removed to reduce fire hazard, locally native trees can be replanted to promote habitat, lessen the disturbance of the natural area, and appease the concerns of the many people who currently enjoy the space.

Sincerely,

Laurel Roth

From: leandra darcy
To: EBH-EIS-FEMA-RIX
Subject: CUTTING DOWN TREES IS NOT THE BEST SOLUTION
Date: Friday, May 17, 2013 9:56:03 AM

Greetings

I understand that UC Berkeley has requested that 85,000 trees be cut down and replaced with woodchips and Round-up? What kind of logic goes into a decision like this? We live in an area and time in history where de-forestation poses greater threats to humanity then fire.

The trees sequester carbon which slows release of more carbon into the air. They provide habitat for a rich vibrant ecology of which humans are dependent and interdependent on to survive. They prevent land slides when there is rain, and they clean our air in a major metro area. And, last but least they provide a natural connection in a world slowly being paved over in the name of progress.

Also to mention, Round Up is highly toxic to all, and it will run into our water supplies and poison many ecologies in the entire area as the chemicals make their way into the ground water. Ever read Silent Spring? Ever hear about the travesty of the mis-use of DDT? Not to mention it won't last forever. Once the system clears the Round Up (a few seasons) small brush will start to grow in and it will require constant application of Round Up to keep the brush at bay. So more and more chemicals or even more fire hazards in the way of small brush which is much more flammable.

These trees have been here longer then the University and have not posed or demonstrated to be a fire hazard. Where is the long term thinking in this plan? Where is the rational and intelligent mind in creating solutions that work in harmony with our environment versus destructive short term solutions that only create more problems?

We need to start applying regenerative solutions to our issues rather then band aid solutions that ultimately make more problems. Please, let's be smart humans. Not stupid humans.

Best regards
Leandra Darcy Jones

From: Martin Rapalski
To: EBH-EIS-FEMA-RIX
Subject: Berkeley/Oakland tree removal
Date: Friday, May 17, 2013 11:47:08 AM

This is an outrage! I oppose the removal of trees and the dumping of roundup on the hills of the canyon.

Sincerely,

Martin Rapalski

Sent from my iPhone

From: Max Winter
To: EBH-EIS-FEMA-RIX
Subject: FEMA"s initiative
Date: Friday, May 17, 2013 11:31:04 AM

I think it's absolutely disturbing and saddening that this plan is even being considered! The Strawberry Canyon area and Berkeley/Oakland hills are absolutely beautiful and one of the reasons that the Bay Area is one of the most beautiful areas of California. I urge you not to cut down these beautiful trees and especially not to spray herbicides like Roundup to ensure that plants do not re-grow-- you risk contaminating the drinking water and put people's health at risk. Lastly, California and especially the Bay Area is one of the most environmentally conscious areas in the U.S. and I think its disgusting that this idea is even being proposed. The majority of people who live in the Bay Area would rather have the beautiful scenery of these hills than see you clear over 20,000 acres.

-Max Winter

From: Miles DeIaco
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees - This is ridicules
Date: Friday, May 17, 2013 9:49:36 AM

To whom it may concern,

The cutting of these trees is absurd! The fact that FEMA cleverly scheduled its three public meetings for mid and late May while UC Berkeley students were in finals or gone shows that this is not an honest decision. If any fire danger is truly present, a healthy thinning of the trees is all that would be necessary. And planning to use herbicides like roundup in our nature is unacceptable. This is not FEMA's land, this is all the people's land, and they should not be allowed to cut these trees down!!

--
Miles DeIaco
Audio Engineer/Mixer

Different Fur Studios
3479 19th Street
San Francisco, Ca 94110

Direct: 520.272.2214
Booking 415.828.4060

miles@differentfurstudios.com
www.differentfurstudios.com

From: Nicholas.B.Hirsch@williams.edu
To: EBH-EIS-FEMA-RIX
Subject: Please Don"t Do This
Date: Friday, May 17, 2013 10:45:44 AM

I have lived in the Easy Bay my whole life. The trees and wildlife in the oakland hills is what makes it such a special place. You guys are effectively ruining it for generations to come. Please please please reconsider
-Brady Hirsch

From: Peter Schorer
To: EBH-EIS-FEMA-RIX
Subject: Do not cut down East Bay trees!
Date: Friday, May 17, 2013 10:49:56 AM

Sometimes it is hard to believe the level of stupidity that government agences are capable of. Your plan to cut down thousands of trees in the San Francisco East Bay is an example.

Let's get to the heart of the matter: you want the public to believe that FEMA is "doing something" about the unending problem of fires in California, mainly Southern California. What you SHOULD be doing, but which is much less of an attention getter, is put into effect, in Southern California especially, measures to reduce the number and severity of fires, beginning with some of the regulations that were implemented after the Oakland/Berkeley Hills fire in the early 90s, e.g., establishing ordinances, and enforcing them, that

all brush within a specified distance from each house is to be cleared;
strongly discouraging or making illegal, shake roofs;
improving access roads.

In addition, you could:

institute round-the-clock patrols of particularly fire-prone areas. College students could be hired to do this, and given bonuses on the days that no severe fire breaks out in their area;
Significantly increase aircraft patrols.

Why the fuck are you planning this outrageous tree-cutting in the East Bay when we have nothing like the fire risk that exists in Southern California? Why do you insist on being like the village idiot, who lost his watch on First St. but is looking for it on Second St. because there is more light (in this case, more public attention). The measures I described above will probably not make it into the newspapers, and so will not give the public reason to believe that FEMA is "doing something". But cutting down thousands of trees! Well, FEMA cares…

We are going to do everything in our power to stop you bastards. Your plan is an embarrassment. Shame on you.

-- Peter Schorer

From: Philipp Grundtner
To: EBH-EIS-FEMA-RIX
Subject: clear-cutting of Strawberry and Claremont Canyons
Date: Friday, May 17, 2013 11:39:30 AM

Dear FEMA, I am writing to strongly urge that you deny UC Berkeley's proposed clear-cutting of Strawberry and Claremont Canyons, which provide important habitat for wildlife and increasingly rare wild natural space for humans to enjoy. I also strongly advise against allowing the use of Roundup, a chemical that can cause complete mortality of tadpoles at ecologically relevant concentrations.

From: riva-isms
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills
Date: Friday, May 17, 2013 9:57:15 AM

Dear FEMA,

Clear-cutting the area in question to the tune of 85000 is a death sentence to the global community. Trees are the future of the planet. Reducing fire hazards must be accomplished in other ways. Every tree cut reduces the amount of oxygen in the atmosphere, and increases CO2 contributing to global warming. Herbicides will poison the groundwater of surrounding communities. This plan must not be passed.

Sincerely,

Riva Weinstein

rivaweinstein.com
917 747 8990

From: Sean McBride
To: EBH-EIS-FEMA-RIX
Subject: Removal of thousands of trees.
Date: Friday, May 17, 2013 10:37:45 AM

Please please reconsider, it seems like there must be a better way than destroying our local ecosystem to protect against fire. Furthermore, the natural habitat must burn from time to time, this is not changed by our desire to use the area. Careful planning and design can help to mitigate the danger, we don't need to remove all these trees.

It really is a shame that this is even an option, especially the toxic herbicide use.

From: Win Mixter
To: EBH-EIS-FEMA-RIX
Subject: Clear-cutting plan in Berkeley/ Oakland hills
Date: Friday, May 17, 2013 11:21:54 AM

Hi there-
I am writing to let you know that I am deeply disturbed by the plan to remove and redistribute the non-native trees that currently grow across the hills of the East Bay.

While I understand the desire to mitigate fire damage, I fear that by spreading dead wood across barren ground and by spreading dangerous pesticides across our land we will be doing far more harm than good. I, along with all of my colleagues, friends, and what I imagine to be most of the other residents of Alameda county, am strongly opposed to your plan.

I urge your organization to reconsider this plan and find other ways to encourage mitigation of fire damage.
Thank you,
Win Mixter

--
Win R. C. Mixter
winmixter@gmail.com
www.winmixter.com

From: Anna
To: EBH-EIS-FEMA-RIX
Subject: comment
Date: Friday, May 17, 2013 12:53:31 AM

To the parties involved,

Please only remove non-native plants and this plan may not be a guise to clear vegetation to allow development. Are the areas in question already actively maintained? Shouldn't those in charge of maintenance already have a non-native vegetation removal plan? If so, then is it necessary to have a large scale, potentially expensive, fire hazard reduction plan? Is it also necessary to use herbicide? Can a cheaper and/or more environmentally friendly alternative be used? Will native vegetation be planted in replacement? What will happen to felled trees? Will they be sold? If so, where will the money go? Aren't wildfires an integral part of California's ecosystem? Please provide a summary of the environmental impacts conducted and written by a qualified and unbiased environmental scientist.

Regards,
East Bay resident

From: Arthur Perley
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 9:15:11 AM

We have real problems of trees and undergrowth posing fire hazards in the East Bay but this is completely nuts! FEMA and UC Berkeley will clear-cut 85,000 (!) trees, not replant, and "will cover 20% of the area in wood chips two feet deep. And it will pour between 700 and 1400 gallons of herbicide to prevent re-sprouting, including the highly toxic herbicide, Roundup." Preserve our natural beauty and our public spaces, don't make them a toxic waste dump! Re: http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees

--
Arthur Perley
El Cerrito

From: B Gray
To: EBH-EIS-FEMA-RIX
Subject: Nix the FEMA EIS
Date: Friday, May 17, 2013 7:06:14 AM

Subject: FEMA plans for fire control "clearing" of Strawberry Canyon and Claremont Canyon:

Cutting down thousands of trees -- which provide soil moisture, and erosion control and assist the watershed of Strawberry Canyon, and then polluting the natural landscape with enough Glyphosate (Roundup) for weed control is a terrible idea.

Where is your research on the long-term human as well as ecological effects. What an ill-thought proposal.

Bettina Gray
1700 Shattuck Ave #59
Berkeley, CA
Berkeley resident since 1970

From: Bill Kristy
To: EBH-EIS-FEMA-RIX
Subject: oppose cutting Trees in Berkeley/Oakland
Date: Friday, May 17, 2013 6:57:23 AM

I very strongly oppose the outrageous plan to chop down trees in Berkeley and Oakland and apply herbicide.

From: bruno ruhland
To: EBH-EIS-FEMA-RIX
Subject: TREES
Date: Thursday, May 16, 2013 9:52:58 PM

Chopping down 87000 trees in the East Bay hills is a terrible out of control government bureaucracy wasting money on destructive crap idea. Don't do it! Thank you. Bruno Ruhland

From: nate hanson
To: EBH-EIS-FEMA-RIX
Subject: Please reconsider the current proposals for fire hazard mitigation of the East Bay
Date: Friday, May 17, 2013 3:39:29 AM

While I understand the need for preventative measures against wildfires in the hills, is massive clear-cutting the best solution? Surely there are less drastic alternatives.

In terms of ecological damage, the eucalyptus tree presence is debatable. But even granting that, is the erosion caused by 5-10 years of strongly limited regrowth worth it?

At the very least, I strongly urge you to consider alternatives to the herbicide triclopyr. It is mildly to highly toxic to insects and fish, and Berkeley's Strawberry Creek would be vulnerable.

The Oakland hills are beautiful, and as an avid trail runner, hiking enthusiast, and bicyclist along Skyline Drive and Grizzly Peak Blvd, I hate to think of the eyesore caused by destruction of hundreds of acres of beautiful forest.

Best,
Nate Hanson
854 Isabella St
Oakland, CA 94607
760.717.3370 | nathaniel.j.hanson@gmail.com

From: Christine Berger
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Hazardous Fire Risk Reduction
Date: Friday, May 17, 2013 5:52:33 AM

There is no need for this wanton destruction of living healthy trees.
If that were not enough the idea of putting wood chips soaked in the most poisonous compound around, Round-Up, is insane.

Is this really the kind of heritage you want to leave, the mark you want to leave on the East Bay?

--
Christine

From: Christopher Hobbs
To: EBH-EIS-FEMA-RIX
Subject: "Hazardous Fire Risk Reduction" proposal
Date: Thursday, May 16, 2013 10:24:35 PM

Hello,

After reading the draft EIS associated with the fire risk reduction proposal, I will have to strongly state that I believe that native shrublad should not be clear cut. In addition, I feel that applying toxic herbicides to extensive areas to prevent resprouting is a very bad idea.
These actions will clearly have a significant detrimental impact on insects, small mammals, and other wild animals living in the areas that are targeted for treatment.

Cutting eucalyptus and nursery stock monterey pines--maybe that has some merit, but not the use of extensive herbicide use in public lands and wild areas. This is not rational, considering the effects to the ecology of these areas.

Thank you,

Christopher Hobbs, Ph.D. Candidate
Integrative Biology
Botanist and naturalist with 38 years of experience in California's wild areas
hobbs@berkeley.edu

From: Christopher Patrick Miller
To: EBH-EIS-FEMA-RIX
Subject: Please Absolutely End This Plan!
Date: Friday, May 17, 2013 8:09:21 AM

To Whom it May Concern,

I am a graduate student at UC Berkeley and often run in the hills of both Strawberry Creek and Claremont Canyon, cycle on the roads in Tilden park, and hike with my dog through similar areas. Let me tell you why this would be a disastrous decision for two main reasons, but there are others of course.

The first is obviously ecological and the herbicides would cause more long-term damage to the water table and ecosystem than any speculative fire. Having read about the long-term effects of Roudup-like products in soil, I am highly suspicious that this project is being conceived as a wholistic effort to protect and enhance life. I suspect it is more of a risk management calculation. This is not to say that forest fires aren't a real threat to human homes and lives, but as you are probably aware, periodic fires are actually necessary for a forest to regenerate itself. This kind of decision-making logic about eliminating a risk before it is a risk could legitimate many horrendous environmental disasters and this is a bad precedent to set for FEMA. In making this decision, you have the potential to ruin soil in a pivotal growth area that feeds directly into the water-tables of Berkeley and Oakland. You will increase erosion and you will eliminate the ability for those trees to capture carbon from the neighboring urban environments.

If you have not already encountered it, here is one article about the long-term damage of herbicides for soil: http://www.motherjones.com/tom-philpott/2011/08/monsantos-roundup-herbicide-soil-damage

Second, the east bay is an area which attracts cyclists, hikers, and urban dwellers who value the ability to move outside of urban density and into a network of areas for natural recreation and study. Have you ever been on Tunnel Road on a Saturday? Or ran up Strawberry Creek on a Friday afternoon? The areas are flooded with people. To remove the growth in these canyons is to diminish what is essentially one of the greatest, most used resources in the city and region, what sets it apart from others. This is not a change of mistake one can recover from either and you will be diminishing the quality of life in this region for generations and generations.

Given the scale of environmental risks and damages to quality of life, I just don't see how this is a responsible decision.

Sincerely,

- Christopher Miller

PhD Candidate
University of California, Berkeley

From: CMB
To: EBH-EIS-FEMA-RIX
Subject: I oppose East Bay Hills hazardous fire risk reduction project
Date: Thursday, May 16, 2013 11:50:37 PM

To whom it may Concern,

I oppose East Bay Hills hazardous fire risk reduction project. I do not support the cutting down of any tree. I believe that is horrible to consider dumping 14,000 gallons on herbicide on the land. This is our land. Do not come and harm it or the trees.

Regards,
Cassie

From: Dana Harrison
To: EBH-EIS-FEMA-RIX
Subject: OBJECTION to plan
Date: Friday, May 17, 2013 9:04:16 AM

To Whom it May Concern:
I have recently become aware of the plan to cut 20,000+trees and spray herbicide to prevent regrowth in Strawberry and Claremont Canyons.

I wish to offer my very strong objection to this plan.

These two areas provide significant recreational opportunities to the hundreds of thousands of people who live in urban Berkeley and North Oakland. They create one of the few easily-accessible access points to nature for folks without cars -- and for their dogs. Destroying these areas and poisoning them with a highly-toxic chemical seems incredibly unwise, even dangerous and destructive to our community civic life and to our health.

Please reconsider this plan!

Dana Harrison
homeowner
2911 Lorina St.
Berkeley, CA 94705

From: greentheglobe@juno.com
To: EBH-EIS-FEMA-RIX
Subject: tree removal
Date: Friday, May 17, 2013 7:40:06 AM

To those concerned:
I submit that although it is a good plan to remove some of the large trees which have grown up in the East Bay hills, to use large quantities of Roundup or other organophosphates on the trees is dangerous and poses a hazard to wildlife, which abounds in the hills. Monterey Pines need no herbicide once cut; they will just die. Eucalyptus can be controlled by using a small amount of herbicide on the cut stumps as a follow-up; surely much smaller amounts of herbicide than have been mentioned can result in the same or better effects. I speak as someone who has participated in eucalyptus control on Albany Hill, and brush control in Nevada county.Thanks, Dave McFarlane

From: Darrin Weyers
To: EBH-EIS-FEMA-RIX
Subject: Opposed to clearing of trees in Claremont & Strawberry Canyons
Date: Thursday, May 16, 2013 9:05:54 PM

Hello,

I am one of the many people who use these wooded areas several times a week for recreation. These canyons are a real treasure and I am opposed to the plan to clear trees and apply herbicides. I will spread the word to the community and hope that the public is given a chance to provide input on this plan.

Darrin Weyers
Oakland, CA

From: david.corsonknowles@gmail.com on behalf of David Corson-Knowles
To: EBH-EIS-FEMA-RIX
Subject: EIS constituent feedback
Date: Friday, May 17, 2013 7:57:03 AM

I am absolutely opposed to the cutting up of our public parks and lands in the Berkeley and Oakland hills.

Please do not pour pesticides on our public park lands where we take our children to learn about nature and see beautiful views of the Bay.

Please do not fund this project. Please do not allow it to happen at all.

Our parks are not a hazard. This proposed project is itself the public hazard.

Please implement the NO ACTION

Thank you,

David Corson-Knowles
3090 King Street
Berkeley, CA 94703

From: David Johnson
To: EBH-EIS-FEMA-RIX
Subject: Support for removal of eucalyptus from East Bay hills
Date: Thursday, May 16, 2013 9:55:26 PM

To whom it may concern:

This note is to applaud FEMA's plan to remove large numbers of mature eucalyptus trees from the the East Bay hills area (San Francisco Bay region). They are a serious fire danger, as we saw in the catastrophic Oakland Hills fire. They are invasive in the exact sense, smothering native trees and shrubs. I have lived in Berkeley for over 40 years and love walking and driving through the hills. Many times have I looked at the eucalyptus forests and despaired that they could ever be removed. So the news that there may be a large-scale removal project is thrilling to me. Many years ago there was a hard freeze that killed many eucalyptus near where I live; the huge stumps can still be seen--surrounded by beautiful wild spaces covered with native plants, shrubs and trees, none of which would be there if the eucalyptus had not been cut down.

You will I am sure get passionate letters denouncing the plan. These will be from well-meaning people who do not understand or cannot imagine any alternative tothe status quo. But the eucalyptus are a plague and eliminating them would be, in the long run, a great blessing.

Best regards,
(Professor) David Johnson
3079 Shasta Road
Berkeley 94708
510-548-9831

From: Douglas Grue
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills
Date: Thursday, May 16, 2013 11:55:08 PM

Dear Fema,

Surely with all the brains and wisdom within your organization you can create a better plan than distruction of habitat and thousands of trees. Trimming trees and undergrowth is a good idea. Complete removal is another story entirely.

I am opposed to this iteration of the project.

Douglas Grue
Registered Voter
Oakland, CA

From: Eric Storm
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project.
Date: Friday, May 17, 2013 7:46:41 AM

One of the primary reasons why the climate is changing and increasing the fire danger to the Oakland hills is that so much natural beauty, forest and wild lands are being destroyed. You are creating your own desert. Once the Bay Area was a place of lush beauty, but the paving over and cutting of trees has steadily helped create a hotter drier climate. The destruction of these trees will further perpetuate the transformation of the Bay Area into an arid climate. If you want to really protect this area while reducing fire danger then clearing out some of the underbrush would make sense, but completely removing it is absurd!

From: Erica
To: EBH-EIS-FEMA-RIX
Subject: Claremont canyon clear cut
Date: Friday, May 17, 2013 9:02:37 AM

To whom it may concern,

Your plan of clearcutting and then using the highly toxic product Roundup in Claremont canyon and the surrounding hills is incredibly misinformed and shortsighted. I've done published botanical studies on the Claremont area, and there is no possible benefit to your management approach. Please desist immediately.

If you open a public forum and state the problems that you are trying to solve, which I assume are non-native species encroachment and fire hazard, you will find crowd sourced solutions which actually make sense, unlike your current solution which will only create more problems. You do know about intensive goat grazing which is being used in that area for vegetative management, right? Or did you not look at local solutions and just went with the solution from your 1950's handbook?

Stop. You're messing up.

Sincely,
Erica Kesenheimer.

From: Evan Daly
To: EBH-EIS-FEMA-RIX
Subject: Please explain why you plan to murder 10s of 1000s of trees, and
Date: Thursday, May 16, 2013 11:11:28 PM

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destroy the ground we live on. This is an unprecedented environmental holocaust, and must be stopped. The people behind this project are operating far from the standpoint of considering anything on this great Earth sacred. WHAT DO YOU THINK YOU ARE DOING? YOU ARE LITERALLY KILLING THE PLANET, AND EVERYONE INVOLVED, WITHOUT DISCRETION. This Earth is not your toy, and has no place for a bunch of maniacal lunatics destroying its environment, and saturating it in toxic, poisonous chemicals. There is no logic, deductive reasoning, or money that can justify your actions. Cease and desist.

From: greentheglobe@juno.com
To: EBH-EIS-FEMA-RIX
Subject: tree removal
Date: Friday, May 17, 2013 7:40:06 AM

To those concerned:
I submit that although it is a good plan to remove some of the large trees which have grown up in the East Bay hills, to use large quantities of Roundup or other organophosphates on the trees is dangerous and poses a hazard to wildlife, which abounds in the hills. Monterey Pines need no herbicide once cut; they will just die. Eucalyptus can be controlled by using a small amount of herbicide on the cut stumps as a follow-up; surely much smaller amounts of herbicide than have been mentioned can result in the same or better effects. I speak as someone who has participated in eucalyptus control on Albany Hill, and brush control in Nevada county.Thanks, Dave McFarlane

From: Hillary Brooks
To: EBH-EIS-FEMA-RIX
Subject: don"t destroy our trees
Date: Thursday, May 16, 2013 11:54:10 PM

To FEMA:

Berkeley needs trees and our earth needs trees, now more than ever! This plant to raze Strawberry Canyon and thousands of local trees here and in Oakland and contaminate our area with herbicides is shockingly wrong-headed.

There has got to be another way. I had to write as soon as I heard this, and I am moving next to tell my friends and neighbors about this sneaky plan.

Hillary Brooks
2634 Acton St
Berkeley, CA 94702

From: Janice Henderson
To: EBH-EIS-FEMA-RIX
Subject: Strawberry & Claremont Canyon / East Bay Clearcutting
Date: Friday, May 17, 2013 6:31:38 AM

I stand in opposition to FEMA's plan to destroy the trees in Berkeley's historic Strawberry and Claremont Canyons and the clearcutting in Oakland East Bay. I also oppose the plan to spray these areas with highly toxic herbicide chemicals. The environmental impact to wildlife and humans is too great. Do not go forward with this plan.

Sincerely,
Janice Henderson

From: Jeff Gill
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyon
Date: Friday, May 17, 2013 9:06:22 AM

To whom it may concern,

I am writing in reference to the proposed plan of cutting down trees in Strawberry and Claremont Canyon. As a UC Berkeley employee I feel that it is not only unnecessary to complete this project for fire prevention as it hasn't caused an issue greater than any other forest area, but the fact that UC Berkeley is supporting spraying 1400 gallons of toxic herbicides into a regional park area is deplorable. I heed you to stop the nonsense and not go forward with this plan.

--
-Jeff Gill
jmgill@berkeley.edu
CSS - IT

From: jen@twowingsyoga.com
To: EBH-EIS-FEMA-RIX
Subject: don"t destroy berkeley"s historic strawberry and claremont canyons
Date: Thursday, May 16, 2013 7:56:13 PM

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dear sirs,

it is with a heavy heart and an astounded mind that i write having just heard of your plans to remove 85,000 trees in our community. and, to ask how uc with federal funds can possibly decide to make such an egregious error against the environment in the name of 'reducing fire hazard'.

please don't destroy berkeley's historic strawberry and claremont canyons. after all, the choice is truly not yours alone to make and such a self-interested decision will certainly come back to haunt us all. aside from the loss of the trees, the use of herbicides at the proposed level boggles the mind/sickens the heart.

your plan in the name of 'safety', if that is indeed the cover you're hoping to hide behind, is just wrong-headed. hopefully, our community will not stand for it. and, if all else fails, will not forgive you for it.

so, think again, folks...there's more at stake than your own interests/needs...we are but stewards for this land. our time here is but temporary. if not for yourselves, do it for your kids/grandkids.

thank you for your thoughtful consideration.

peace,
jen

jen burk reynolds
san francisco bay area
http://www.twowingsyoga.com
LOVE SERVE REMEMBER

From: crystalmettamega@gmail.com on behalf of jessica britt
To: EBH-EIS-FEMA-RIX
Subject: Berkeley between 700 and 1400 gallons of Round-UP you are not serious -
Date: Friday, May 17, 2013 9:00:53 AM

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dear FEMA

this is a horrible plan, if the clear cut must be done - at least use Vinegar instead of Round up, my lungs are already in shock at just the thought -

has no one been reading what is happening to the bee population - there must be other choices

http://www.agardenforthehouse.com/2011/06/got-weeds-use-vinegar-not-roundup/

Please consider this deeply

Jessica Britt

--
mega metta

jessica

From: jessicabowen6648@comcast.net
To: EBH-EIS-FEMA-RIX
Subject: FEMA clear-cutting of millions of trees in the San Francisco Bay Area
Date: Thursday, May 16, 2013 11:09:24 PM

To whom it may concern:

These projects are more likely to **increase the risk of wildfires** than to reduce that risk.

By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will **damage the environment** by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will **endanger the public** by dousing our public lands with thousands of gallons of toxic herbicides.

* **Erosion** is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* **Non-native vegetation** such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* **Prescribed burns** will pollute the air and contribute to the risk of wildfire, endangering lives and property.

This project is far from the mandate of FEMA. These projects are an **inappropriate use of the limited resources** of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

This project must be halted. Your agency is overreaching (seems to be a common practice in the 21st century).

Sincerely,

Jessica Bowen

Alameda, CA

From: Jing
To: EBH-EIS-FEMA-RIX
Subject: Unjustified
Date: Thursday, May 16, 2013 7:00:51 PM

An incredibly important fact, that area is already a landslide zone. So by destroying all plant life and killing the root system, the next Big earthquake will most likely cause a disastrous landslide. I'm not entirely sure which areas of trees you plan on cutting down, but that could lead to widespread destruction.

Plus I really don't see how replacing the entire area with wood chips and then killing all plant life with herbicide would help prevent fires. It seems like the wood chips would become incredibly dry and turn into tinder. Thus creating a giant tinderbox for the next fire to instantly erupt, and that will be mixed with all the toxic by-products from the combustion of the pesticide.

You need to address these issues for me, otherwise I will widely distribute this information and the operation will be stopped.
- Jing

From: Jonathan Reynolds
To: EBH-EIS-FEMA-RIX
Subject: berkeley/oakland clear cut
Date: Thursday, May 16, 2013 9:48:56 PM

Please don't clear cut in the Strawberry and Claremont Canyon areas of Berkeley.

Thank you,

Jonathan

--
Jonathan Reynolds, MFT Intern (Registration Pending)
Mindfulness-Based Psychotherapy & Meditation
Supervised by Eugene Porter, MFT #19703
Grateful Heart Holistic Therapy Center
http://www.ayogisway.com
--
Co-Founding Editor, Journal of Holistic Psychology
http://www.journalofholisticpsychology.com

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From: joyce
To: EBH-EIS-FEMA-RIX
Subject: NO on East Bay Hills Hazardous Fire Risk Reduction Program
Date: Friday, May 17, 2013 8:07:45 AM

Please DO NOT continue with the East Bay Hills Hazardous Fire Risk Reduction Program. I do not approve of this UNNECESSARY use of funds, and I am AGAINST this land MISMANAGEMENT. The destruction of the trees and subsequent use of the known toxic herbicide Roundup pose more of a DANGER than the threat of wildfire. Please DO NOT allow this program to move forward!!

Joyce Crowley

From: juanxcaballero@gmail.com on behalf of Juan Caballero
To: EBH-EIS-FEMA-RIX
Subject: Anti-fire measures in Strawberry Canyon and Claremont Canyon, Berkeley/Oakland, CA
Date: Friday, May 17, 2013 9:05:06 AM

I use both canyons and I think clearcutting is excessive, and the 1400 gallons of pesticide absurd. Pretty sure the Sierra Club and local groups would love to donate the expensive time of specialists and experts that could come up with more reasonable ways of making a fire buffer.

Thank you,
__juan caballero
Oakland resident since 2003

--
Juan Caballero
PhD., University of California, Berkeley, 2013
Visiting Assistant Professor of Spanish & English
Christian Brothers University
Memphis, TN, 38104
Office: (510) 984 3015

From: Linda Pazdirek
To: EBH-EIS-FEMA-RIX
Subject: Tree removal in Berkeley, Ca
Date: Thursday, May 16, 2013 8:28:08 PM

To Whom it May Concern,

I just heard about fema's plans to clear cut in the strawberry and claremont canyons and more. I strongly object to this project, as well as the plans to spray Round-up to prevent re sprouting. This is a beautiful part of our community and it will be a great loss.

Linda Pazdirek, MFT
LIC #40145
510.982.6332

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From: Marilyn Borchardt
To: EBH-EIS-FEMA-RIX
Subject: Proposed cut of trees in Strawberry and Claremont Canyons of Berkeley/Oakland hills
Date: Friday, May 17, 2013 8:09:23 AM

I oppose the use of Roundup and other herbicides that will enter our watershed. This is not healthy for humans nor animals. Cut the trees, mulch heavily and then keep cutting as sprouts emerge. Perhaps various public and private organizations can adopt sections of the hills to perform this routine cutting of the sprouts.

Thank you for considering this request.

Marilyn Borchardt
6035 Ocean View Dr
Oakland, CA. 94618

From: Marina Bear
To: EBH-EIS-FEMA-RIX
Subject: Strawberry Canyon Trees
Date: Friday, May 17, 2013 8:13:21 AM

I wish to register my serious opposition to the proposed clear cutting of trees in the Strawberry Canyon and Claremont Canyon area and especially the use of herbicides in that area. As a long-time hiker and lover of the Strawberry Canyon trail I cannot imagine that there is no other solution to fire prevention. Please reconsidered this decision.

Marina Bear

From: marit bk
To: EBH-EIS-FEMA-RIX
Subject: Fire safety in the Berkeley/ Oakland hills
Date: Thursday, May 16, 2013 8:25:53 PM

TO WHOM IT MAY CONCERN:

Hello,
As an avid hiker in the East Bay, I am very aware of how important it is for wildlife to have undeveloped land next to the urban areas. I just heard that there are proposed plans from FEMA to clear cut in the Strawberry and Claremont canyons in order to reduce a fire danger. Aside from removing huge groves of trees and destroying much needed wildlife habitats, there are potential plans to cover the ground in toxic herbicides. I am STRONGLY opposed to both of these plans. This cannot happen. I would like to see some environmentally sensitive measures taken to address the fire safety issue. There are ways to thin growth without destroying the forest. This proposal seems akin to cutting off one's foot in order to prevent an accidental foot injury.

Marit Brook-Kothlow
1732 7th Street
Berkeley, CA 94710

From: Marna Clark
To: EBH-EIS-FEMA-RIX
Subject: PLEASE - DON"T CUT BERKELEY TREES
Date: Friday, May 17, 2013 7:35:16 AM

OMG ! Couldn't believe what I was reading when I learned that the Government wants to clear-cut, then put ROUNDUP, on the trees in Strawberry Canyon. PLEASE RECONSIDER !!

YES, PLEASE RECONSIDER. WORST MISTAKE EVER. EVERYONE WILL REGRET THIS. ANIMALS WILL DIE.
LAND WILL SLIDE. THOUSANDS OF RUNNERS/WALERS WILL LOSE A BEAUTIFUL AND WELL USED TRAIL.

OMG! I CAN'T BELIEVE THIS WOULD BE HAPPENING.

IT LIKE A TREE HOLOCOST!!!!

From: Megan Guaraglia
To: EBH-EIS-FEMA-RIX
Subject: clear cutting in berk oak hills
Date: Friday, May 17, 2013 1:18:03 AM

Hello my name is Megan Guaraglia, I am a registered voter in the east bay area. I strongly oppose the cutting down of the trees in our neighborhood, such little forest is left as is, to cut down so many trees would be appalling and tragic. We need places to run and hike and enjoy nature. I see no legitimate reason for this to occur please cease and assist!

From: nate hanson
To: EBH-EIS-FEMA-RIX
Subject: Please reconsider the current proposals for fire hazard mitigation of the East Bay
Date: Friday, May 17, 2013 3:39:29 AM

While I understand the need for preventative measures against wildfires in the hills, is massive clear-cutting the best solution? Surely there are less drastic alternatives.

In terms of ecological damage, the eucalyptus tree presence is debatable. But even granting that, is the erosion caused by 5-10 years of strongly limited regrowth worth it?

At the very least, I strongly urge you to consider alternatives to the herbicide triclopyr. It is mildly to highly toxic to insects and fish, and Berkeley's Strawberry Creek would be vulnerable.

The Oakland hills are beautiful, and as an avid trail runner, hiking enthusiast, and bicyclist along Skyline Drive and Grizzly Peak Blvd, I hate to think of the eyesore caused by destruction of hundreds of acres of beautiful forest.

Best,
Nate Hanson
854 Isabella St
Oakland, CA 94607
760.717.3370 | nathaniel.j.hanson@gmail.com

From: NICHOLAS JAY STEWART
To: EBH-EIS-FEMA-RIX
Subject: Stop Clear Cutting in Berkeley and Oakland!
Date: Friday, May 17, 2013 7:33:02 AM

To all it concerns,

Just like the Bay, the trees of Berkeley and Oakland define the two cities. These two cities, especially in Berkeley because it is where I live, have a remarkable character about them many cities lack. This character lies in the opportunity city goers have to travel only 5-10 minutes from the busy and crowded city to an overwhelmingly beautiful and quiet natural retreat. The trees, like the Bay, are a priceless resource of constant appreciation that people in Berkeley and people that visit Berkeley remark about with thankfulness and admiration. My friend visited me in Berkeley, and the thing that struck her with the most wonder was " All the trees!". Most cities lack the dual testaments to man-made ingenuity and natural tranquility that Berkeley and oakland have to offer. And, like when the Bay was threatened to be filled, the Bay area will rally to stop the trees from being exterminated. We all share a combined affection for the defining characteristics of the city, the trees and the Bay, and will rally if anything else is threatened to be destroyed. I don't want wood chips, I don't want Roundup herbicide, and I don't want Berkeley harmed! I want the trees, just like we all want the Bay.

Sincerely,

Nick Stewart

University of California Berkeley, Junior

P.S. I do have a final today and should be studying frantically instead of writing this, but some things are more important.

From: Office of the Secretary
Subject: Honoring Fallen Officers During National Police Week
Date: Friday, May 17, 2013 7:55:08 AM
Attachments: image001.png

Homeland Security

May 17, 2013

Dear Colleagues,

As we celebrate National Police Week, we honor the men and women of our Department's law enforcement community and remember those who have given their lives in the line of duty.

This year, 321 names of fallen officers will be added to the National Law Enforcement Officers Memorial Wall, including five members of U.S. Customs and Border Protection and one member of the U.S. Coast Guard who were killed in the line of duty. We honor the memory of Agents Leopoldo Cavazos Jr., James R. Dominguez, Jeffrey Ramirez, Nicholas J. Ivie, and David Delaney of the U.S. Border Patrol; and Senior Chief Petty Officer Terrell Edwin Horne III of the U.S. Coast Guard. They represent the spirit of public service and the best of our nation. We offer our condolences to their families, friends, and loved ones who feel the great pain of their absence and who, themselves, have made tremendous sacrifices.

This week, we recommit ourselves to the causes they served — upholding the rule of law, the pursuit of justice, and the protection of the American people. And we commit to always remembering the lives they led, the contributions they made, and the examples they set.

Let us also recognize the acts of selflessness and heroism performed by our DHS law enforcement personnel in communities across the country, every single day.

Yours very truly,

Janet Napolitano
Secretary

From: Robin Kincade
To: EBH-EIS-FEMA-RIX
Subject: Berkeley trees
Date: Thursday, May 16, 2013 10:37:27 PM

I vote. I strongly ask that you please do NOT clear cut or cut the trees in Berkeley California. I don't want to see this happen.

I do vote

and if FEMA chooses to do this outrages act, ill contact my rep and howl.

Robin Kincade
robinkincade.com
Sent by my brain

From: Sarah Benson
To: EBH-EIS-FEMA-RIX
Subject: NO to tree removal in Strawberry and Claremont Canyons!
Date: Friday, May 17, 2013 7:21:34 AM

To whom it may concern,

I was horrified to learn about the planned tree removal in Strawberry and Claremont Canyons. This will cause untold harm to Berkeley's beautiful environment and will destroy one of the most lovely areas in town - my beloved hometown. I urge you to cancel this terrible plan.

Sincerely,
Sarah Benson

From: Shane Mason
To: EBH-EIS-FEMA-RIX
Subject: Regarding Strawberry Canyon Risk Reduction Project
Date: Friday, May 17, 2013 6:45:15 AM

Hello,

I am a Bay Area Cal Alumnus and I lived just below Strawberry Canyon for 3 years while I went to Cal. It would be an incredible shame to destroy that beauty and use herbicides to ensure it never comes back again. This would be a terrible action to take against everyone who lives and hikes in that area.

I understand the need for wildfire risk reduction, but the public needs to be included in this decision. Please reschedule the meetings for a time when students can actually come i.e. during summer session or during the school year.

Thank you for your consideration,

Shane

From: Sharon Muczynski
To: EBH-EIS-FEMA-RIX
Subject: Killing trees and pouring herbicide
Date: Friday, May 17, 2013 8:56:39 AM

EGH_EIS_FEMA,

Dangerous and stupid idea to destroy trees, poison them, and then allow non-native grasses and weeds come in. The fire danger will increase with a huge load of dead weeds during the summer.

You are just destroying an active, vital ecosystem. This plan is a stupid, misguided hysterical reaction to fire threat. It is not science-based, but something I would expect from a backwards hillbilly town rather than in city with an academic history. You people are idiots!

Sharon Muczynski
muczynski.sharon@gmail.com

From: Jeff Gill
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyon
Date: Friday, May 17, 2013 9:06:22 AM

To whom it may concern,

I am writing in reference to the proposed plan of cutting down trees in Strawberry and Claremont Canyon. As a UC Berkeley employee I feel that it is not only unnecessary to complete this project for fire prevention as it hasn't caused an issue greater than any other forest area, but the fact that UC Berkeley is supporting spraying 1400 gallons of toxic herbicides into a regional park area is deplorable. I heed you to stop the nonsense and not go forward with this plan.

--
-Jeff Gill
jmgill@berkeley.edu
CSS - IT

From: Adam
To: EBH-EIS-FEMA-RIX
Subject: a foolish plan
Date: Thursday, May 16, 2013 4:29:49 PM

Please,please listen to the voice of reason and DO NOT clear cut the Oakland and Berkeley hills. I am a Berkeley grad (1972) and I clearly remember the big freeze of 1972 when the eucalyptus trees froze and the "experts" wanted to cut down every tree. Thankfully, cooler minds prevailed, and those trees are still there and thriving.

Clear cutting is a foolish proposition and will satisfy no one. PLEASE reconsider this idiotic decision.

Get advice from some intelligent foresters, not FEMA.

thank you
Adam Reed
Ashland Oregon

Sent from my iPad

From: Adam and Jennifer Reed
To: EBH-EIS-FEMA-RIX
Subject: Destruction of Strawberry and Clarement Canyons, Berkeley and Oakland
Date: Thursday, May 16, 2013 3:03:10 PM

What are you thinking? The plan to cut 80,000 trees and then dump over a thousand gallons of herbicide to utterly destroy two habitats is as bizarre and senseless and it is outrageous: destroy Nature in order to save what exactly? Is there an agenda to build subdivisions in these beautiful canyons and this is the way to railroad it through?

What's the real agenda here? What is the real thinking here? Destroy Nature so you won't have to spend money on firefighters? This outrageous, insane plan must be canceled.

My husband is a graduate of UC Berkeley. He's busy arranging hospice care for his dying father in Southern California. I write on his behalf.

Jennifer Reed
Ashland, OR

From: Aileen Frankel
To: EBH-EIS-FEMA-RIX
Cc: Howard Matis
Subject: Endorsement of the Fire Risk Reduction project in the East Bay
Date: Thursday, May 16, 2013 3:11:38 PM

Dear FEMA

I support the fire risk reduction project in the Oakland & Berkeley Hills and strongly endorse
your proposed elimination of hazardous, flammable eucalyptus and pine trees along the wind-prone
East Bay Hills of California.

Your EIS and other environmental reviews should be approved immediately.

Please keep me informed of your progress in this matter.

Sincerely,

Aileen Frankel
15 Binnacle Hill
Oakland, CA 94618

(Yes, I live in a subdivision of homes that were completely destroyed by the 1991 Hills Firestorm.)

From: Barbara Silverberg
To: EBH-EIS-FEMA-RIX
Subject: Re: Support of EIS for East Bay Hills
Date: Thursday, May 16, 2013 3:16:05 PM

Re: Support of EIS for East Bay Hills

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term enhancement to the land should move forward without delay. We Claremont Canyon residents know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive. Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,
Barbara Silverberg
1909 Tunnel Road
Berkeley, CA 94705

From: bdwcgpx@gmail.com on behalf of bdwc
To: EBH-EIS-FEMA-RIX
Subject: AGAINST the alleged fire risk reduction activities
Date: Thursday, May 16, 2013 6:09:00 PM

I agree with Million Trees' assessment of the U.S. Department of Homeland Security's Federal Emergency Management Agency's proposed hazardous fire risk reduction activities. Please include my objections, outlined below, in the Environmental Impact Statement (EIS) for Alameda and Contra Costa counties and in the Miller Knox/Shoreline. Let's bring this to a full stop.

* These projects are more likely to increase the risk of wildfires than to reduce that risk.

By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will damage the environment by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will endanger the public by dousing our public lands with thousands of gallons of toxic herbicides.

* Erosion is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* Non-native vegetation such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* Prescribed burns will pollute the air and contribute to the risk of wildfire, endangering lives and property.

* These projects are an inappropriate use of the limited resources of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

--

Brandon Williamscraig Ph.D.
5739 McBryde Ave
Richmond CA 94805
public@bdwc.net

From: Carol LaPlant
To: EBH-EIS-FEMA-RIX
Cc: "Michael L. PALMER"
Subject: Clear cutting and herbicide spraying in Claremont Canyon
Date: Thursday, May 16, 2013 6:57:33 PM

I am a frequent runner and hiker in Claremont Canyon and the other trails of the East Bay hills. I am a resident of Berkeley. I write to express my strenuous opposition to the proposed clear cutting and herbicide spraying in these areas. The proposed activity would do irreparable damage to one of the most beautiful nature areas in the Bay Area.

Carol P. LaPlant
89 Menlo Place
Berkeley, CA 94707

From: Charlene M. Dexter
To: EBH-EIS-FEMA-RIX
Subject: tree cutting
Date: Thursday, May 16, 2013 3:21:37 PM

It is hard to fathom that you would cut down all those trees. I hope you reconsider killing those trees.

From: gay auerbach
To: EBH-EIS-FEMA-RIX
Subject: Support of EIS for East Bay Hills
Date: Thursday, May 16, 2013 4:49:44 PM

Dear FEMA,

We strongly support the wildfire hazard mitigation projects for the East Bay Hills. The EIS findings that removal of non-native eucalyptus trees would improve fire safety and likely enhance the land on our coastal hills convince us that the project should move forward as soon as possible. We who live close to Claremont Canyon know how exploding eucalyptus trees can fuel devastating fires, and we would love to see a return to the native vegetation that burns much less dangerously when it does catch fire than the invasives do.

Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,
Gay and Alan Auerbach
110 El Camino Real
Berkeley

From: Jackie Hasa
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project
Date: Thursday, May 16, 2013 5:13:13 PM

Dear FEMA,

I write to express my extreme dismay at learning that FEMA is planning to remove thousands of trees in Berkeley and Oakland, with the very thin justification that these constitute a fire hazard. These trees have been an important, beautiful part of the environment in the East Bay for hundreds of years, and if these trees are a fire hazard, then truly most trees in all of California's populated areas are as well. Please do not move forward with this damaging, potentially disastrous plan.

Thank you.

Jackie Hasa, former UC Berkeley student and East Bay commuter

From: joanne cohn
To: EBH-EIS-FEMA-RIX
Subject: fire hazard, straberry/claremont canyons
Date: Thursday, May 16, 2013 3:03:15 PM

Hi,
Please do not cut down the 22,000 trees in these canyons (and please do not replace them with herbicide laden wood chips!). We do not want this poison in our neighborhood, leeching into the air and poisoning us, and our children.
Thank you,
Joanne

From: Judy Weiss
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Environmental Impact Statement
Date: Thursday, May 16, 2013 5:23:39 PM

Dear FEMA Staff:

I am writing in support of the rapid approval of the EIS concerning the removal of eucalyptus and other hazardous vegetation in the East Bay Hills to mitigate wildfire hazards. These projects have been well studied and the EIS findings of improving the safety and long-term enhancement to the area should move forward expeditiously. I know that the removal of the eucalyptus and other highly flammable vegetation from the north side of Claremont Canyon, replacement/regrowth with native plants, and diligent follow-up to discourage regrowth and weeds, as what has been down with the south side of the canyon, will result in a more natural healthier landscape. As a neighbor of Claremont Canyon, and a frequent visitor (biking, running and hiking), I am fearful of a devastating wildfire that could occur during windy, hot, dry weather.

Thank you in advance for supporting this important work. Please approve the EIS as is, and soon, so that the projects can move forward without further delay.

Sincerely,

Judy Weiss
6012 Auburn Avenue
Oakland, CA 94618

From: Julie Andersen
To: EBH-EIS-FEMA-RIX
Subject: FEMA East bay Hills website issue
Date: Thursday, May 16, 2013 2:58:38 PM

Hello,

When I click on the cover page, abstract, Table of contents link for the DEIS on the http://ebheis.cdmims.com/Documents.aspx website, I receive the following error:

Duplicate headers received from server

The response from the server contained duplicate headers. This problem is generally the result of a misconfigured website or proxy. Only the website or proxy administrator can fix this issue.
Error 349 (net::ERR_RESPONSE_HEADERS_MULTIPLE_CONTENT_DISPOSITION): Multiple distinct Content-Disposition headers received. This is disallowed to protect against HTTP response splitting attacks.

You may want to address this issue to make the DEIS more useable for people who are viewing it online.

-Julie

From: Karen Keeshan Suarez
To: EBH-EIS-FEMA-RIX
Subject: Canyon tree removal
Date: Thursday, May 16, 2013 5:14:49 PM

Regarding the Federal Emergency Management Agency plan to cut down 22,000 trees in Berkeley's historic Strawberry and Claremont Canyons and over 60,000 more in Oakland.

Fire management is a good thing. Fuel reduction of overgrowth, and removal of non native invasive plants is great. The native trees are not the problem. Total vegetation removal is a disaster in the making.

The Coastal Live Oak tree in my front yard could someday catch fire. It could spread to my home and burn it to the ground.
I could roll around in a wheel chair to prevent ever falling too.

Native trees are necessary for life. Do the right thing, and work with the community for the betterment of all.

Thank you for your consideration
Karen K. Suarez
Monrovia, CA

From: Rich Buckley
To: EBH-EIS-FEMA-RIX
Subject: NonNative Tree Removal
Date: Thursday, May 16, 2013 5:49:19 PM

Please place me on your emailing list.

Rich

Rich Buckley
Rich Buckley Realty
www.BuckleyRealty.com
925-443-1122
Sent from my iPad

From: Sandra Michaelis
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting of 85,000 Berkeley and Oakland Trees
Date: Thursday, May 16, 2013 5:17:43 PM

I would not like to see this kind of destruction of trees and vegetation. Families chose to live in these communities knowing that fires are always a possibility. What about the impact of the loss of that vegetation and the means used to prevent new growth. I would hope that FEMA would reconsider this decision.

Sandra.

925-264-5900 home

From: Scott Wheeler
To: EBH-EIS-FEMA-RIX
Subject: No cuts, no herbicide, no Roundup, period.
Date: Thursday, May 16, 2013 3:29:21 PM

From: stuart phillips
To: EBH-EIS-FEMA-RIX
Subject: DO NOT CUT ANY TREES IN OAKLAND/BERKELEY CA EVER!
Date: Thursday, May 16, 2013 5:41:37 PM

DO NOT CUT ANY TREES WHATSOEVER IN BERKELEY, OAKLAND, OR ANYWHERE IN THE BAY AREA OF CALIFORNIA, THESE MISGUIDED PROJECTS WOULD ACTUALLY EXACERBATE FIRE BY DRYING OUT SOIL, CREATING MORE FLOOD & MUDSLIDE PRONE AREAS WHERE CUT, INCREASING HEAT TO AREA.
TREES SHADE, MOISTEN SOIL, KEEP WATER FROM RUNNING AWAY, KEEP SOILS INTACT, PROVIDE WILDLIFE & QUALITY OF LIFE HABITAT, SHADE ENVIRONMENT, CLEAN AIR.
DO NOT CUT ANY TREES IN OUR BAY AREA, EVER, THIS IS A HUGE WASTE OF MONEY THAT DESTROYS OUR LOCAL ENVIRONMENT TOTALLY AT BEST!
stu lips, oakland, ca

From: Tom Walker
To: EBH-EIS-FEMA-RIX
Subject: Clear cutting of trees on East Bay Hills
Date: Thursday, May 16, 2013 4:37:15 PM

I am completely opposed to the plan to remove hundreds of thousands of trees from our hills in the name of “fire prevention”.

Has FEMA not heard of global warming and the positive effects of trees on the problem?

Tom Walker

From: Bdgillies@aol.com
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Fire Prevention
Date: Sunday, May 19, 2013 11:17:47 AM

Dear FEMA.

I strongly support the wildfire mitigation projects for the East Bay Hills. I know from experience that, when ignited, the eucalyptus canopy will spread wildfire dangerously during our windy fire season.

Thank you for supporting this project. Please approve the EIS.

Very truly yours,

Bruce Gillies
2950 Russell St. Berkeley, CA 94705

From: Carolyn Tipton
To: EBH-EIS-FEMA-RIX
Subject: Disastrous Plan
Date: Sunday, May 19, 2013 1:25:18 PM

Dear FEMA,

You must reject these grant proposals and come up with something less monumentally destructive. No action is far better than such destructive action. What you may not know is that the East Bay Hills and Parks provide a necessary outlet /pressure valve release for this increasingly dense area. I was born and raised in Berkeley and have seen it grow increasingly crowded. People visit the parks in increasing numbers to get relief. The beauty of the trees is important to all of us, whether we are walking , hiking, picnicking, walking our dogs, biking, or just sitting and enjoying breathing the good air provided by the trees. There is no way that a destructive plan involving the loss of trees and the spread of dangerous herbicide will ever be allowed to progress. You must re-think your plan.. And have a little consideration for the huge numbers of people for whom the park is a necessary and pleasurable part of their everyday lives.

Sincerely,
Carolyn Tipton

From: Cody Petterson
To: EBH-EIS-FEMA-RIX
Subject: RE Hazardous Fire Risk Reduction
Date: Sunday, May 19, 2013 1:50:11 PM

With regard to the Hazardous Fire Risk Reduction,

I rarely make comments on these sorts of government boondoggles, but this is just preposterous. Your solution to the risk of a forest burning down, and thus threatening the homes and facilities that have been built in that forest, is to completely eliminate the forest? Wow, that's really a thoughtful, conscientious solution. This is yet another example of the kinds of solutions bureaucrats think up when they're managing resources that aren't theirs. If you were worried about your own forest and wildlife and recreational resources, would you destroy them in order to prevent their burning down? Why was approval given for urban development in the first place, if the limited development that was approved actually led inexorably to the clear-cutting of the entire surrounding area? Surely there are more cost-effective solutions to fire risk than destroying everything combustible within sight? I spent years living in the Berkeley hills, at Grizzly Peak and Summit, and hiking and jogging through Strawberry Canyon almost daily, appreciating the woods and the wildlife and the respite from the bustle of the city. I currently live in San Diego, California, where we live with the continual threat of fire from the chaparral that predominates in the region. Do we mitigate this risk by trying to destroy all the trees and bushes as far as the eye can see? No. Far from it. Not only would it be impossible, and cost-preventative, but it would lead to a whole host of other problems, like soil erosion, pesticide-contamination, and overall degradation of the ecosystem. No, we create firebreaks and access roads to impede fire and facilitate the activity of firefighters, we create effective disaster-response policies and institutions, we train our firefighters and other first responders to successfully fight fires, and to alert and provide care for the community should they be affected. Yours is a plan that might have been crafted in Soviet Russia or Maoist China. It is a plan that demonstrates the extreme short-sightedness of government bureaucrats, and their tendency to over-reach and to resort to clumsy, unimaginative, destructive "solutions" rather than develop innovative, efficient, and forward-thinking approaches to collective problems. One suspects, furthermore, that UC Berkeley's long-term objective is to develop Strawberry Canyon. It can't have escaped them that the only direction in which expansion is possible is eastward up into the Canyon. Additionally, the EIS's definition of Monterey pine as "non-native" is invidious and borderline dishonest. While it's true that the Pine is not native to the exact hillsides on which it is currently growing, it *is* native to the Monterey Bay, which is roughly 75 miles away--not your typical definition of an "invasive species." The Pine groves on the south side of Strawberry canyon are a beautiful part of the local ecosystem and, while not technically autochthonous, are certainly authentic to the larger central Californian region.

In summary, while I understand that the risk of fire is significant and distressing, and that there is a collective interest in helping the coastal forest return to a more natural state, particularly with regard to the elimination of Eucalyptus and Acacia, which are indeed invasive and highly flammable, the current plan strikes me as clumsy, environmentally damaging, and unimaginative. Surely there are more measured, gradual, and cost-effective solutions that can be developed with the cooperation of the community and the University, rather than mass clear-cutting under the aegis of the Department of Homeland Security and FEMA.

Sincerely,
Cody Petterson
La Jolla, CA
Graduate of the University of California, Berkeley

From: Conrad Fiederer
To: EBH-EIS-FEMA-RIX
Subject: Do not cut the trees in Strawberry and Claremont Canyons
Date: Sunday, May 19, 2013 2:24:09 PM

Please reconsider and do not cut the trees in Strawberry and Claremont Canyons! These provide a means for helping to clean the air for the surrounding areas and wildlife sanctuary for the animal life.
Dumping herbicide on the area will only find itself being taken into the food chain and into the runoff downhill into aquafers, and being absorbed into the children and pets playing there.

This is a really bad idea.

From: Dawn R
To: EBH-EIS-FEMA-RIX
Subject: Berkeley trees
Date: Sunday, May 19, 2013 12:04:45 PM

I am a resident of the Bay area and we treasure all of our open parklands and pockets of nature. These are vital for our health and preservation of plants and anilmals is not optional. To say this pocket of nature is a hazard is negligent and criminal. Replacing a lovely vibrant wood with a pesticide and herbicide laden wasteland is criminal. Doing it in a sneaky underhanded way is even worse. Sinful! Do not ruin more nature. Leave things alone.

From: Felicia Dale
To: EBH-EIS-FEMA-RIX
Subject: Re: East Bay Hills hazardous fire risk reduction project.
Date: Sunday, May 19, 2013 2:21:20 PM

Hello,
I'd like to register my complete and utter rejection of this plan. Clear cutting and then dousing land with highly toxic chemicals is simply NOT a good idea! There are so many issues here that fire seems like a great thing in comparison. There must be some other way to reduce the risk of fire without completely destroying and then poisoning an entire ecosystem.

Please look into other options for fire safety and don't do this terrible thing to the land.

Thank you.
Felicia Dale.

From: hoody up
To: EBH-EIS-FEMA-RIX
Subject: berkeley and oakland clearcutting = BAD IDEA
Date: Sunday, May 19, 2013 12:18:54 PM

Just another person voicing my opposition to this destruction of trees and natural habitat.

Andrew Golding

From: j s
To: EBH-EIS-FEMA-RIX
Subject: Oakland-Berkeley clear cut plan intolerable
Date: Sunday, May 19, 2013 12:48:59 PM

Someone at FEMA has obviously gone insane with their plan to clear cut 85,000 trees and poison the natural environment with toxic herbicides. Those responsible should be immediately fired.

Sincerely, John Siner

.

From: joseph maurer
To: EBH-EIS-FEMA-RIX
Subject: eis draft request
Date: Sunday, May 19, 2013 1:12:49 PM

To Whom it May Concern,

Please send me a hard copy of the East Bay Hills Environmental Impact Statement.

Joseph Maurer
955 Karol Way #19
San Leandro CA 94577

Thank You,
Joseph

From: Karl Rogers
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills EIS
Date: Sunday, May 19, 2013 1:00:37 PM

To Whom it may concern,
I am emailing you to express my concern and disappointment about UCB's application to destroy almost 100 acres of woodland in Claremont and Strawberry Canyons.
Not only is this application nothing short of a disgraceful vandalism, an example of lack of responsible land management and a total disregard for conservation, but it is also outrageous that UCB expect the American taxpayers to foot the bill for it.
I hope that this application is rejected.
Yours sincerely,
Karl Rogers

From: Kathleen King
To: EBH-EIS-FEMA-RIX
Subject: FEMA EIS fro East Bay Hills
Date: Sunday, May 19, 2013 2:13:15 PM

As a 40+ year resident of the East Bay, and a 25 year + Park Ranger/Supervisor for the Regional Parks, I am extremely familiar with the issue on non-native trees in the hills. I have hiked the hills countless times, and have participated in managing eucalyptus and other non-natives for over 20 years.From my experience, I know that these trees cause much more damage than good, and that they should be eliminated from the hills and other high fire risk areas. I strongly and unequivocally support this plan, and do not consider it extreme in the least.
The bottom line is, the hills were not covered with trees historically, and they are not needed nor are they desirable. Whatever native trees grow back naturally can be managed if necessary decades from now.

Sincerely,

John Hitchen
845 Oxford
Street
Berkeley, CA 94707
510-524-4028

From: Kyla
To: EBH-EIS-FEMA-RIX
Subject: Easr Bay Hills Fire Reduction Plan
Date: Sunday, May 19, 2013 11:57:16 AM

My name is Kyla Hamlin, I live in Grass Valley, Ca. I STRONGLY oppose this act proposed by FEMA. These trees have shown no risk in all the years they have been here and to cut down a portion of our earths precious natural environment during a time when we need as much environmental protection and preservation as possible is downright wreckless and hazardous in itself to the future of this land. To pour POISON all over it to prevent reseeding??! Who is in charge here? Round Up CAUSES cancer, it's not just linked to it, as well as POISONS the animals and insects that come into contact with it. I am wondering what is the ulterior motive here? Monsanto Round Up ready crops that the public has already made clear we want eliminated? Do not make this enormous and damaging impact on our earth as it will kill the sustainability of the land and decrease the air quality as well as increase temperatures in this area. Leave nature alone. Let me say again I OPPOSE and REJECT this plan and move that it be vetoed and cancelled immediatly.
Kyla Hamlin

From: Mona
To: EBH-EIS-FEMA-RIX
Subject: Submitting Comments on the Draft EIS
Date: Sunday, May 19, 2013 1:04:56 PM

This plan to clear cut is a terrible way to reduce fire threat. The proper management of forests and wildlands does not include clear cutting as part of the process. This is a monstrous decision and must be stopped. Fire danger can be reduced to manageable levels and clear cutting is not the way to do it.

From: Nancy Mueller
To: EBH-EIS-FEMA-RIX
Subject: EIS conclusion on Claremont Canyon fire mitigation project
Date: Sunday, May 19, 2013 11:50:53 AM

Dear FEMA,

I urge you to follow the recommendations of the EIS. It is always hard to see big changes in the landscape. The area that was cleared of Eucs in the mid-Canyon on the south side, has grown back beautifully. The vacant lot next to our house at 790 Alvarado Road was dense with eucalyptus. We missed the 1991 fire by one house and the fact my husband came back to save it (long story) and the wind was blowing southerly. After the fire we bought the vacant lot to the south with the adjacent neighbor and removed most of the eucs. Several oaks and a huge buckeye returned in their place. Since we wanted a Mediterranean, drought tolerant garden we have planted other species. But I regularly pluck out at least 15-20 baby oaks each year. The sow profusely in this area.

Our neighbor has kept 3 big eucs on his property. But he regularly pays for thinning and pruning about every 3 years. Since he can well afford to do this, his eucs are one of the few examples of keeping them horticulturally appropriate. But there is not anything close to this budget to do this type of work in the canyon.

I urge you to take the action recommended in the proposal. It will go a long way to reducing fire danger.

Thank you very much.

Nancy Mueller
790 Alvarado Road, Berkeley CA 94705

From: pgb@igc.org
To: EBH-EIS-FEMA-RIX
Subject: "FIRE REDDUCTION"
Date: Sunday, May 19, 2013 12:22:33 PM

I am writing to express total opposition to the proposal to cut forests in Berkeley and Oakland, supposedly to prevent wildfires. I will give you my real gut level reaction here... this is a disgusting, stupid, and very unscientific proposal.
Forests do burn, but are we going to cut them to prevent wildfires that may or may not occur? If the money that will be used on this proposal could be directed towards a scientific type of forest management, the risk could be minimized. Also, the use of pesticides and Round=up will have a very definite environmental impact, at least as bad as wildfires that may or may not occur. I know I am expressing myself harshly, but this is making me very angry. Please show intelligence and stop this ridiculous proposal from becoming real.
Paul Belz
Oakland

From: Rhonda Gregoire
To: EBH-EIS-FEMA-RIX
Subject: Clear-cutting Berkeley trees
Date: Sunday, May 19, 2013 12:01:14 PM

Please remember that our environment is delicate and our planet depends on trees to stay healthy. Please don't cut down the healthy trees for landscape.

Rhonda Gregoire
809 Andrea drive
Loveland, Ohio 45140
Sent from my iPad

From: Tea Silvestre
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Fire Reduction Project
Date: Sunday, May 19, 2013 2:06:04 PM

I'm writing today to register my full opposition to this project. Not only is clear cutting trees a problem, but pouring herbicide all over this area is crazy.

PLEASE PLEASE think twice. There must be other ways to mitigate the fire risks. You don't need to poison the land, the drinking water, etc.

I'm seriously appalled that this project ever got this far.

UC Berkely? What were you thinking??

Sincerely,
Tea Silvestre
San Jose, CA

From: Teri Hitt
To: EBH-EIS-FEMA-RIX
Subject: Please don"t cut the tress down and pour poison into the ground!
Date: Sunday, May 19, 2013 12:08:06 PM

This is ridiculous!
There are better ways to accomplish fire safety and not poison the ground and ground water than clear-cutting 85,000 beautiful Berkeley and Oakland trees, including 22,000 in historic Strawberry and Claremont Canyon
There is a whole eco-system there.
Please care...find a better way, that keeps the natural beauty of the area.
We need more trees, not less.

Thanks for reading this,

Teri Hitt

From: Val Henderson
To: EBH-EIS-FEMA-RIX
Subject: mass destruction of our planet
Date: Sunday, May 19, 2013 11:44:48 AM

Dear FEMA,
The mass destruction of the Berkeley forests in the Strawberry and Claremont Canyons and again in Oakland, is yet another way of proving to the world that the U.S. government has absolutely no interest in environmental reverence. As we all have to share this planet with your political irresponsibility and corporate views, I feel it is my duty to have my opinion heard on the destruction you are causing the planet. Your decisions affect all of us, in many ways, and they are not supported by the general public.

If your plan is to destroy the earth by poisoning as much of it as you can, then you are absolutely doing a sensational job at it. Perhaps you are considering cutting all of your forests down, to prevent fires, and the Berkeley forest is only the first on your agenda. To replace the forest with woodchips and chemicals to ensure that nothings will ever grow there again is also grossly destructive. Your proposed plan may be the simplest and cheapest remedy but surely, there is at least one intelligent person in your educated country that could find a solution that is more environmentally friendly. If you do not educate your people in environmental practices, I am sure the rest of the world would be glad to supply you with some insight and ideas.

I can only pray that a mightier sword emerges soon to cut down the capitalistic embarrassment that you have become. Your nation has become the enemy of humanity and your practices must stop before they kill us all.

Sincerely,
Val Henderson

From: alyssa
To: EBH-EIS-FEMA-RIX
Subject: tree cutting in Oakland and Berkeley, CA
Date: Sunday, May 19, 2013 5:06:51 PM

Please reconsider your decision to cut 85,000 trees in Berkeley and Oakland. These trees have withstood the climate and the earthquakes of the past and there is no need to destroy them. Putting pesticides down is harmful for the environment.

Sincerely,
Alyssa S.
Alameda, CA

From: DEB
To: EBH-EIS-FEMA-RIX
Subject: Denuding and spraying of Oakland Hills
Date: Sunday, May 19, 2013 3:37:19 PM

Please, please do not put this very ill-conceived and over-the-top plan in motion! It is wrong for so many reasons. It also has been very poorly publicized.

Deborah Bullock
Oakland resident since 1992

Sent from my NOOK

From: Gillian Servais
To: EBH-EIS-FEMA-RIX
Subject: In support of EIS for the East Bay Hills
Date: Sunday, May 19, 2013 4:46:40 PM

Dear FEMA,
As a homeowner that lost everything in the '91 Oakland Firestorm I strongly support the wildfire hazard mitigation projects for the East Bay Hills. Please end the studies and begin the process of pro actively protecting the residents and wild life of the east bay.

Thank you for supporting this important work.

Sincerely,
Gillian E Servais

From: Jennifer LaPorta
To: EBH-EIS-FEMA-RIX
Subject: STOP the tree cutting in Strawberry Canyon and Claremont hills and in Oakland!!!
Date: Sunday, May 19, 2013 6:36:59 PM

---

this is crazy! We LOVE our trees! how dare you????

From: Jennifer Michels
To: EBH-EIS-FEMA-RIX
Subject: STOP the tree removal of Strawberry Canyon~~no tree removal
Date: Sunday, May 19, 2013 4:02:28 PM

Ive been a resident of Berkeley for almost 20 years, and enjoy Strawberry Canyon at least 3-5 days a week. This is our Berkeley sanctuary, our forest. Clear cutting 22,000 trees from the Canyon is not the way to preserve our precious land. Fires can be prevented without the removal of these trees. Please stop this from happening.
It is a sanctuary for so many residents.

Jennifer Michels
2524 Webster st
Berkeley, Ca 94705

--
510 612 5025
www.jennmichels.com

From: Jessica Shipman
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Fire Reduction Project
Date: Sunday, May 19, 2013 6:52:36 PM

To Whom It May Concern:

I believe that replanting with native vegetation will be needed for this project to be successful. The virtual bare areas that will be left will most likely grow back with other non-native vegetation instead of the intended native vegetation. I hope this step will be considered.
Thank you.
Jessica Shipman

From: Jessie Thompson
To: EBH-EIS-FEMA-RIX
Subject: EIS fire risk reduction plan
Date: Sunday, May 19, 2013 7:40:00 PM

This plan is out of the question connected to any form of sanity. I disagree with every spoken and written for doing it at all! These trees are causing no harm, where as the roundup you plan to flood the ground with causes a multitude of concerns. All of us as well as our future generations will be effected by this plot of wrong doing http://www.huffingtonpost.com/2013/04/25/roundup-herbicide-health-issues-disease_n_3156575.html

The environment is not something we should mindlessly eradicate, it supports us! We are a part of it, NOT the other way around.

I am strongly against this proposal.
Take away the trees and take away the air we breathe.

Concerned,

Jessie Thompson

From: John Lemire
To: EBH-EIS-FEMA-RIX
Subject: Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Sunday, May 19, 2013 6:24:58 PM

(FEMA) DON'T CHOP DOWN the 22,000 trees in Berkeley's historic Strawberry and Claremont Canyons and over 60,000 more in Oakland.

DON"T pour between 700 and 1400 gallons of herbicide to prevent re-sprouting, including the highly toxic herbicide, Roundup.

STOP THIS MADNESS!

Sincerely,
John Lemire

From: Karen
To: EBH-EIS-FEMA-RIX
Subject: Berkeley Trees
Date: Sunday, May 19, 2013 7:51:59 PM

Please send me more information about the plan to remove trees.

I oppose this action.

Karen Storey
kbeakbird@aol.com

From: Katie Markiewicz
To: EBH-EIS-FEMA-RIX
Subject: Round-up to get rid of trees?!?
Date: Sunday, May 19, 2013 2:34:02 PM

Please do not destroy the trees in CA! Thank you,

Katie Markiewicz

Sent from my iPhone

From: Kevin
To: EBH-EIS-FEMA-RIX
Subject: tree removal in Berkeley & Oakland
Date: Sunday, May 19, 2013 4:21:30 PM

Please continue with the removal of invasive species (eucalyptus and Monterey Pine - which is not native) in the Berkeley and Oakland hills. This has been going on gradually for a few years around the area, and where the eucalyptus have been removed the habitat is recovering, and live oaks, bay trees, toyon etc. are filling in where the eucalyptus were. Eucalyptus are allelopathic - they drop chemicals on the ground around them that prevent the growth of other species. When they're removed, the soil recovers and native species return. Eucalyptus and Monterey Pine are both HIGHLY flammable, and if you witnessed the Oakland Hills fire, you know how flammable they are. The natives are MUCH less flammable. As an environmentalist and homeowner in the Oakland hills, I've been doing this on a small level myself for years, and you can clearly see the benefits. I'm thrilled that Oakland and UC are finally taking care of this issue, and I hope this worthy project is not derailed by well-meaning, but misguided "environmentalists." Thoughtful environmentalism doesn't mean saving all trees. It's considering the whole ecosystem.

Kevin Beals, Environmental Educator, Lawrence Hall of Science

From: Li
To: EBH-EIS-FEMA-RIX
Subject: please recognize its better to leave the trees alive.
Date: Sunday, May 19, 2013 3:22:20 PM

---

please recognize it is best to leave these trees alive .

thank you.
li samadhi

From: Liz Ozol
To: EBH-EIS-FEMA-RIX
Subject: make a better choice
Date: Sunday, May 19, 2013 4:32:10 PM

Hello there,

Clear-cutting trees and using herbicides seems like the opposite of a sustainable, green approach to land management. Please consider other actions that could be taken to reduce the fire hazard, like thinning, without destroying this beautiful environment.

Thanks for your consideration.
Sincerely,

Liz Ozol

--
Liz Ozol
Principal
New Highland Academy
"Academic, Artistic and Interpersonal Excellence"

8521 A St.
Oakland, CA 94621
(c) 510-684-9015
(w) 510-729-7723
(f) 510-729-7725

From: Lynn Fang
To: EBH-EIS-FEMA-RIX
Subject: Please do not go through with clear cutting trees at Strawberry and Claremont Canyon!
Date: Sunday, May 19, 2013 2:39:05 PM

Hi,

I understand the need for fire management in the East Bay, but clear-cutting trees will more likely increase the risk of wildfires than to reduce that risk. Clear-cutting would actually make ignition more likely for the following reasons:

- distributing tons of dead wood onto bare ground, concentrating and enhancing wildfire risk in that region
- eliminating shade and fog drip which moistens the forest floor
- destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California
- expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

These projects will damage the environment by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

These projects will endanger the public by dousing our public lands with thousands of gallons of toxic herbicides.

Erosion is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

Non-native vegetation such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

Prescribed burns will pollute the air and contribute to the risk of wildfire, endangering lives and property.

These projects are an inappropriate use of the limited resources of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

The current Draft EIS is unacceptable as it will inflict enormous environmental damage, expose the public to thousands of gallons of toxic herbicide, destroy raptor habitats, destabilize steep slopes, and actually increase the risk of hazardous wildfires.

FEMA should retract this EIS and remove those portions of the EIS that call for clear-

cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing more than 50,000 trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem.

Please make the health and vitality of the local ecosystem your foremost priority before you consider this destructive plan!

Lynn Fang

From: Nhu Miller
To: EBH-EIS-FEMA-RIX
Subject: killing trees
Date: Sunday, May 19, 2013 6:26:09 PM

This plan is a toxic and unnecessary way of pruning trees.
Do not do this!
please.

Nhu Miller
Panoramic Way
Berkeley, California

From: Ra"Bia Cruser
To: EBH-EIS-FEMA-RIX
Date: Sunday, May 19, 2013 5:42:42 PM

I am a citizen of Contra Costa County, and HIGHLY disagree with your plans to cut 22,000 trees to "help with a fire hazzard". Furthermore, it is horrid that you will be using Roundup, to prevent regrowth of the natural habitat. I am only one person, with one voice, but why can't you please consider honoring the feelings and concerns of a typical person, without power but an opinion, and others like myself?

From: Rebekah Moan
To: EBH-EIS-FEMA-RIX
Subject: The fire hazard
Date: Sunday, May 19, 2013 3:07:20 PM

Hi there,
I'm writing to say I officially oppose the plan to chop down trees on 2,000 acres to reduce fire hazard. I oppose this plan because it will raise the fire hazard by substituting more flammable vegetation like scrub and grasses. I also disapprove of the plan because thousands of gallons of toxic herbicides will be in use for up to seven years. I wanted to make it known as a Berkeley resident I do not approve of the plan. Thank you for your attention.

Sincerely,
Rebekah Moan

--
Another world is not only possible, it's probable.

From: Richard Robinson
To: EBH-EIS-FEMA-RIX
Subject: Don"t cut trees and pour roundup at Claremont Canyon.
Date: Sunday, May 19, 2013 3:45:57 PM

Don't cut trees and pour roundup at Claremont Canyon preserve.
Abandon that plan and use other ways of doing fire risk reduction rather than such extreme ecological damage and destruction.
Its an absurd plan that will destroy the ecology, kill countless trees and animals, destroy the beauty, and ruin the area for recreational use.
Richard Robinson. Oakland Homeowner. 94618

From: sharon kulz
To: EBH-EIS-FEMA-RIX
Subject: Don"t kill our trees. We need the fresh air.
Date: Sunday, May 19, 2013 6:00:25 PM

At a time when the Federal government is down-sizing basic social requirements, I really don't see spending our hard-earned tax money killing trees in Oakland and Berkeley.

This is as absurd as bull-dozing wooden houses on the outside chance that they, too, might prove a fire hazard.

Save our money AND our trees!

Sharon

From: Shelly Ottenheimer
To: EBH-EIS-FEMA-RIX
Subject: What? Do not touch our trees or environment!!!!!
Date: Sunday, May 19, 2013 6:41:04 PM

Unbelievable this is wrong!!! What is this East Bay Hills EIS sneaky-ass crap? How dare you!!! Do not do this!!

Do not take trees and dump harmful chemicals in my backyard.

Shelly

From: Sid Sattler
To: EBH-EIS-FEMA-RIX
Subject: Tree Destruction Permit Strawberry Canyon
Date: Sunday, May 19, 2013 4:23:55 PM

UC Berkeley has applied for the grant to destroy the Strawberry and Claremont Canyon areas, claiming that the trees pose a fire hazard.

Trees can be managed in many creative ways that do not eliminate them --- since they are irreplaceable and give us good energy.

Sid Sattler
sid@sattlerelectric.com

From: Rollam Group
To: EBH-EIS-FEMA-RIX
Subject: No on funding of cutting down all the trees in the east bay hills
Date: Sunday, May 19, 2013 7:38:20 PM

IT is a terrible plan to cut down all the trees in the east bay hills but have no plan to replant. If half the money was used for replanting, maybe that would work but your plan is idiotic and no one wants no trees and a bunch of herbicides instead of a nice park. I hope you do not give the funding.

From: carolyn cipperly
To: EBH-EIS-FEMA-RIX
Subject: Tree removal
Date: Monday, May 20, 2013 7:15:53 AM

Please don't remove the trees in strawberry and claremont canyon! Furthermore, applying loads of roundup is an even worse idea!
Thanks.
Carolyn Cipperly
Glenwood Springs, Colorado

From: phillip mccarthy
To: EBH-EIS-FEMA-RIX
Subject: save the trees
Date: Monday, May 20, 2013 7:06:41 AM

Save the trees!!!

From: Ned
To: EBH-EIS-FEMA-RIX
Subject: I"m the 5th signer: "FEMA: Stop the destruction of Berkeley"s Historical Strawberry and Claremont Canyons!"
Date: Monday, May 20, 2013 6:47:48 AM

Dear Alessandro Amaglio,

I just signed a petition addressed to you titled *FEMA: Stop the destruction of Berkeley's Historical Strawberry and Claremont Canyons!*. So far, 5 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://petitions.moveon.org/target_talkback.html?tt=tt-43334-custom-21799-20130603-7KtTiM

The petition states:

> "Stop the FEMA plan to clear-cut 85,000 historical Berkeley and Oakland trees! This destruction will be unrepairable for decades!"

My additional comments are:

> Cutting down thousands of air filtering oxygen generators is bad enough, but then laying down (how many!?) tons of Round Up herbicide makes this a treachery to the environment.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=864826&target_type=custom&target_id=21799

Ned
Sebastopol, CA

This email was sent through MoveOn's public petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you have any questions, please email petitions@moveon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=r9qg6n6KYrWzHTupglRoCkVCSC1FSVMtRkVNQS1SSVhAZmVtYS5kaHMuZ292&petition_id=43334 .

From: Penelope Seitler
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyons
Date: Monday, May 20, 2013 5:52:33 AM

As a citizen who regularly visits beautiful areas of the US i find the plan to clear cut and dump chemicals into the Strawberry and Claremont Canyons to be of National interest. Such actions are completely antithetical to environmental health and will destroy more than just the trees and shrubbery. The chemicals will leach into the aquifer. Millions of creatures will be destroyed or rendered homeless.
I would like to know what insanity prompted this proposed action. This action must not take place.

Penelope Seitler

If you wish to make an apple pie truly from scratch, you must first invent the universe. -Carl Sagan, astronomer and writer (1934-1996)

I would rather be vilified for doing the right thing than be praised for doing the wrong thing. - me.

walk in beauty, - p

From: Mindy Caswell
To: EBH-EIS-FEMA-RIX
Subject: Clear cutting trees
Date: Monday, May 20, 2013 4:30:00 AM

To Whom it may concern,
I just read this article, and my question is this: What the hell are you thinking? Have you all lost your minds? That is not how you handle Forest Fire Prevention! Destroy all this for what? Have you lost your minds???? It sickens me to think this is going to happen! You must not go through with this! THINK IT OVER!!!! STOP DESTROYING THINGS!!! Allow brush & dead fall collection! This will help prevent future problems! Do it SMART!!! This is insanity!
:http://intellihub.com/2013/05/18/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees/

--
Don't cry because it's over, Smile because it happened...(Dr.Suess)

From: Karen Hinderstein
To: EBH-EIS-FEMA-RIX
Subject: Srawberry canyon
Date: Monday, May 20, 2013 2:37:46 AM

Dear Sirs:
Please do not use roundup in the Strawberry canyon and other areas. This area is the home for thousands of birds and hundreds of non human animals. Round up is highly toxic. Do not poison the areas .

Sincerely,

Karen Hinderstein

From: Linda Rasmussen
To: EBH-EIS-FEMA-RIX
Subject: I"m the 4th signer: "FEMA: Stop the destruction of Berkeley"s Historical Strawberry and Claremont Canyons!"
Date: Monday, May 20, 2013 2:28:46 AM

Dear Alessandro Amaglio,

I just signed a petition addressed to you titled *FEMA: Stop the destruction of Berkeley's Historical Strawberry and Claremont Canyons!*. So far, 4 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://petitions.moveon.org/target_talkback.html?tt=tt-43334-custom-21799-20130603-7KtTiM

The petition states:

> "Stop the FEMA plan to clear-cut 85,000 historical Berkeley and Oakland trees! This destruction will be unrepairable for decades!"

My additional comments are:

> This just cannot happen. It is incomprehensible to me that anyone could even imagine that destruction of not only the trees but also the environment might be a plausible solution to preventing fires.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=864474&target_type=custom&target_id=21799

Linda Rasmussen
Henrietta, TX

This email was sent through MoveOn's public petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you have any questions, please email petitions@moveon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=r9qg6n6KYrWzHTupglRoCkVCSC1FSVMtRkVNQS1SSVhAZmVtYS5kaHMuZ292&petition_id=43334
.

From: stuart phillips
To: EBH-EIS-FEMA-RIX
Subject: DO NOT CUT ANY TREES IN OAKLAND/BERKELEY CA EVER!
Date: Monday, May 20, 2013 2:19:48 AM

DO NOT CUT ANY TREES WHATSOEVER IN BERKELEY, OAKLAND, OR ANYWHERE IN THE BAY AREA OF CALIFORNIA, EVER!! THESE MISGUIDED PROJECTS WOULD ACTUALLY EXACERBATE FIRE BY DRYING OUT SOIL, HEATING UP GROUND, CREATING MORE FLOOD & MUDSLIDE PRONE AREAS WHERE CUT, INCREASING HEAT TO AREA.
TREES SHADE, MOISTEN SOIL, KEEP WATER FROM RUNNING AWAY, KEEP SOILS INTACT, PROVIDE WILDLIFE & QUALITY OF LIFE HABITAT, SHADE ENVIRONMENT, CLEAN AIR.
DO NOT CUT ANY TREES IN OUR BAY AREA, EVER, THIS IS A HUGE WASTE OF MONEY THAT DESTROYS OUR LOCAL ENVIRONMENT TOTALLY AT BEST!
stu lips, oakland, ca

From: Ian Z
To: EBH-EIS-FEMA-RIX
Subject: Oakland Tree Removal Plan
Date: Monday, May 20, 2013 12:50:11 AM

To whom it may concern,

This is a ridiculously idiotic plan and those behind it should be flogged, seriously. I know that sounds extreme, but we live in a world plagued by deforestation and worsening atmosphere, we need all the trees we can get. Are you kidding me? "Those trees are made out of wood..which can burn,,,so we should cut them down and poison the land. " It defies stupidity, it is an atrocity, this plan.
You get the gyst, I hope this one of many so I'll keep it brief. Good day.

Ian Zucker

From: Janet Linn
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Monday, May 20, 2013 12:42:00 AM

This is Insanity at its extreme. Cutting down trees and destroying the bucolic Strawberry and Claremont Canyon areas, claiming that the trees pose a fire hazard, then pouring poisonous chemicals to prevent it from resprouting is pure insanity.

Please do not let this occur.
Keep me informed of all community meetings in both Albany and Berkeley on this matter.

Janet Linn
(510) 527-2300

From: Elizabeth
To: EBH-EIS-FEMA-RIX
Subject: Please Read
Date: Sunday, May 19, 2013 10:59:51 PM

Dear FEMA representative,
I recently heard about the permanent destruction
of trees at Berkeley planned by FEMA.
In my opinion, the destruction of these trees
is appalling and should not be considered.
Please try again to come up with a better solution
to whatever issues you are trying to address.
I hope that if you are a Christian-minded individual,
you will recall that God will destroy those who
destroy the Earth. *That includes the trees.*
Kindest regards,
Elizabeth Follette

From: Kent Van Cleave
To: EBH-EIS-FEMA-RIX
Subject: NO CLEAR CUT. NO CHEMICALS. East Bay Hills hazardous fire risk reduction project
Date: Sunday, May 19, 2013 10:51:56 PM

The plan to clear cut the Strawberry and Claremont Canyon areas is an egregious violation of environmental stewardship principles. Please halt this plan altogether. Both the chemicals intended to be used and the leachate from the wood chips will toxify the immediate environs, the watersheds, and the underlying aquifer. Long-term, clearcutting will harm wildlife and promote erosion and dust storms.

Alfred Kent Van Cleave, Jr., Ph.D. (and the son of a career forester)
865 898-5368

From: Will Larche
To: EBH-EIS-FEMA-RIX
Subject: Please don"t cut the trees in strawberry canyon
Date: Sunday, May 19, 2013 10:43:49 PM

They have improved the area tree-mendously :)

From: Destany D
To: EBH-EIS-FEMA-RIX
Subject: Don"t cut down the trees!!!
Date: Sunday, May 19, 2013 10:40:14 PM

Put a stop to this!! Those trees don't need to be cut down! There's animals who live there, what will they do? Is killing thousands of animals worth it? NOOOOO! Don't do it!!
http://ebheis.cdmims.com/Home.aspx
Sent from my iPhone

From: Juan Guerrero
To: EBH-EIS-FEMA-RIX
Subject: Uc Berkeley strawberry trees
Date: Sunday, May 19, 2013 10:33:05 PM

I cannot believe the plans to clear these beautiful lands from the strawberry trees, it is absurd and frustrating to always be on the defensive 24/7 from institutions or gov't agency's that are continuously trying to meddle with our pristine lands that Mother Nature provides. Please stop these outrages plans and start focusing on real issues like fracking and radiation fallout!

Juan Guerrero

KPFF Consulting Engineers
O: (310) 665-1536
F: (310) 665-9070
jguerrero@kpff-la.com

From: Lar Bryer
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills EIS
Date: Sunday, May 19, 2013 10:32:09 PM

FEMA Region IX East Bay Hills EIS
PO Box 72379
Oakland, CA 94612-8579

By email: EBH-EIS-FEMA-RIX@fema.dhs.gov

Dear FEMA Region IX Administrators:

I actively support the East Bay Hills EIS and recommend the approval of the proposed projects and release of grant funding.

I am aware of the support the EIS has received from The Hills Emergency Forum. The Hills Emergency Forum is comprised of nine public entities formed after the 1991 OaklandBerkeley Hills (Tunnel) Fire dedicated to wildland fire safety. Many of these agencies have land management policies and long range plans that address hazardous fire risk reduction.
Members facilitate a cooperative approach to addressing wildland interface issues by sharing
information and best management practices. Collectively, the Forum continues to build upon decades
of managing projects to demonstrate how hazardous fire reduction can be environmentally
sensitive and sustainable.

I applaud your review of connected actions that provides a more comprehensive look at
potential cumulative impacts of the projects. I appreciate the recommended mitigation
measures that may be incorporated into current adaptive management strategies to continue to
avoid environmental impacts.

I support acceptance of the EIS and fully funding the proposed projects. This will allow the
City of Oakland, East Bay Regional Park District and University of California, Berkeley to
continue to play a critical role in fuel reducing the risk of a hazardous wildfire on public lands
while balancing environmental protection with long term, cost effective actions.

Sincerely
Lawrence W. Bryer

From: la creates
To: EBH-EIS-FEMA-RIX
Subject: trees
Date: Sunday, May 19, 2013 10:21:47 PM

The proposal to cut 85,000 trees in Oakland and Berkeley is damaging to habitat and environment, unnecessary, wasteful and poses an environmental hazard.

I have read absolutely no good argument for cutting these trees and I am just as concerned about plans for using toxic chemicals to prevent re-sprouting as I am about removing the trees.

There are many other actions that could be pursued to prevent fires other than cutting down trees.

I'm shocked and disgusted that FEMA is moving forward with this. What a waste of money- why wasn't this ridiculousness halted due to the sequester????

Laura Anderson
Oakland, Ca

From: cristen
To: EBH-EIS-FEMA-RIX
Subject: Please clarify..
Date: Sunday, May 19, 2013 10:00:37 PM

Please, please tell me this isn't true: "The trees in Strawberry and Claremont Canyon have been there for decades and hardly constitute a "hazard." But pouring 1400 gallons of herbicide on the currently pristine hills will create a real hazard, and UC Berkeley even plans to use the highly toxic herbicide "Roundup" to squelch the return of non-native vegetation."

finish each day and be done with it. you have done what you could.
some blunders and absurdities have crept in; forget them as soon
as you can. tomorrow is a new day. you shall begin it serenely and
with too high a spirit to be encumbered with your old nonsense.
- emerson

From: Karen Cutler
To: EBH-EIS-FEMA-RIX
Subject: clear cutting in Oakland & Berkerley
Date: Sunday, May 19, 2013 9:37:28 PM

To whom it may concern:

My family & I are strongly opposed to any clear cutting in the Oakland & Berkeley hills. These hills are a sanctuary. These trees are not a fire hazard. Rather they are an asset to our natural environment and should either be thoughtfully thinned or left as is. Please! No clear cutting in our back yard!

Sincerely,
Karen Cutler

From: Kate Shankari Sadowsky
To: EBH-EIS-FEMA-RIX
Subject: please reconsider
Date: Sunday, May 19, 2013 9:10:10 PM

We are east bay residents: who know fire risk, we know earthquake risk, and we choose to live here because we are drawn to the beauty and community. Those trees are a part of this.

Fire hazard is nothing compared to loss of our natural inspiration and the potential health risks of the chemicals used after the cutting. Please reconsider and allow the people who live around the area to make the decision. This should not be a UC Berkeley or FEMA decision and will greatly affect the health and natural habitat of our neighborhoods.

Thank you,
Kate Sadowsky
Oakland, CA

We are what we repeatedly do. Excellence, then, is not an act but a habit.
~Aristotle

From: joe
To: EBH-EIS-FEMA-RIX
Subject: Claremont & Strawberry Canyone
Date: Sunday, May 19, 2013 9:04:20 PM

These are such beautiful areas. There is no good reason to take down these trees. There is even less reason to use a toxic herbicide like Roundup. We should be working to avoid poisoning and deforesting our land, not moving forward with such dangerous pracits.

Sincerely,
Joseph Nesselroth
Loveland, CO

From: Janet Smith
To: EBH-EIS-FEMA-RIX
Subject: EIS Plan
Date: Sunday, May 19, 2013 8:20:27 PM

Dear FEMA,

I am not a scientist, or botanist, or engineer, but it takes nothing more than COMMON SENSE to see that this plan has serious flaws. As a lifetime North Oakland resident who has enjoyed the park for 50+ years, I am DEEPLY dismayed that we can't come up with something better than this to reduce fire hazards and eliminate the eucalyptus.

I don't want to enumerate the dangers and hazards in the plan – people far more educated and articulate have already done that. What I do want to do is voice my concerns, add my name to the growing list of citizens who oppose the plan, and BEG that some other alternatives be considered.

I completely understand the concerns about fire, and the problem with the Eucalyptus being a foreign, invasive species. We have known this for YEARS and YEARS. WHY have we waited for these trees to fully establish themselves and their accompanying ecosystem of wildlife before deciding something had to be done??

I hate the thought of what we are leaving our kids and grandkids, that we can't seem to come up with anything more creative, anything more life-giving, than clear cutting and then poisoning one of the east bay's most beautiful assets.

I will do everything I can to see that this project does not happen in my back yard.

Sincerely,
Janet Smith
Claremont Ave.
Oakland, 94618

From: sandy62255@yahoo.com
To: EBH-EIS-FEMA-RIX
Subject: east bay hills fire reduction plan
Date: Monday, May 20, 2013 7:10:07 AM

Its foolish to destroy so many trees , then to poison the land. Lands been forested hundreds of years. I lived in the bay area for a year and liked my hills alive. Keep them that way.

Are you a shill for an unidentified interest that wants to poison the U.S. and/or build something unworthy of the hills ? Aren't there better ways to spend FEMA money ?

Don't do it.

Sandy Tabin

From: Lisa Griffin
To: EBH-EIS-FEMA-RIX
Subject: STOP the Plan to Remove Trees!
Date: Monday, May 20, 2013 8:54:57 AM

To Whom It Concerns:

I am a very concerned Oakland resident, educator, and nature enthusiast, frequently hiking and enjoying the breathtaking areas that are proposed for dramatic tree removal with the use of the FEMA funds. I am shocked, disappointed, and deeply troubled to learn that this plan has been in process in a rapid set of events, with limited public information or comment. Everyone I have spoken to about this proposal has been against it, though all of us missed the final public comment meeting this past Saturday as we did not know of it until today.

I have brought my children up into those hills numerous times over the past seven years, and will never forget the amazement we all felt upon witnessing a trio of young owls as they grew strong enough to fly. There was a small crowd of hikers watching them, awed, as they sat on a tall branch of one of the eucalyptus trees, and the feeling of awe and wonder was palpable in the air. If this plan is allowed to continue, how many raptors and other wildlife will have their homes destroyed? What will the impact of herbicides being applied on tree stumps along the entire network of trails and forests?

I urge you to stop this plan, and to consider less drastic and harmful measures to reduce fire danger in the Oakland and Berkeley hills.

Lisa Griffin

From: helena pisani
To: EBH-EIS-FEMA-RIX
Subject: I"m the 10th signer: "FEMA: Stop the destruction of Berkeley"s Historical Strawberry and Claremont Canyons!"
Date: Monday, May 20, 2013 8:52:30 AM

Dear Alessandro Amaglio,

I just signed a petition addressed to you titled *FEMA: Stop the destruction of Berkeley's Historical Strawberry and Claremont Canyons!*. So far, 11 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://petitions.moveon.org/target_talkback.html?tt=tt-43334-custom-21799-20130603-7KtTiM

The petition states:

> "Stop the FEMA plan to clear-cut 85,000 historical Berkeley and Oakland trees! This destruction will be unrepairable for decades!"

My additional comments are:

> Stop!!!!

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=864945&target_type=custom&target_id=21799

helena pisani
la honda, CA

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From: Helen Peddro
To: EBH-EIS-FEMA-RIX
Subject: I"m the 11th signer: "FEMA: Stop the destruction of Berkeley"s Historical Strawberry and Claremont Canyons!"
Date: Monday, May 20, 2013 8:51:58 AM

Dear Alessandro Amaglio,

I just signed a petition addressed to you titled *FEMA: Stop the destruction of Berkeley's Historical Strawberry and Claremont Canyons!*. So far, 11 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://petitions.moveon.org/target_talkback.html?tt=tt-43334-custom-21799-20130603-7KtTiM

The petition states:

> "Stop the FEMA plan to clear-cut 85,000 historical Berkeley and Oakland trees! This destruction will be unrepairable for decades!"

My additional comments are:

> I am a native Californian.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=864946&target_type=custom&target_id=21799

Helen Peddro
Maricopa, AZ

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From: Annie McHale
To: EBH-EIS-FEMA-RIX
Subject: Berkeley Tree Cutting Proposal
Date: Monday, May 20, 2013 7:50:06 AM

Are you flippin' crazy????? It's outrageous enough that this blasphemous action of cutting down trees is being considered, but following it up with a massive dose of Roundup is beyond insane!

DO NOT DO IT!!!! I am so sick and tired of this ignorance, greed, and lack of concern for nature and its impact on human life. We can't have life without nature. Did you miss that 3rd grade lesson?

--
Annie McHale

From: Keith Rashall
To: EBH-EIS-FEMA-RIX
Subject: Berkeley/oakland tree removal
Date: Monday, May 20, 2013 7:37:44 AM

Removing the trees as planned is a terrible idea and spreading toxic herbicides to prevent re-growth is even worse.
Where do you get these ideas ?
Keith rashall
Sent from my iPad

From: Laila Selk
To: EBH-EIS-FEMA-RIX
Subject: I"m the 7th signer: "FEMA: Stop the destruction of Berkeley"s Historical Strawberry and Claremont Canyons!"
Date: Monday, May 20, 2013 7:35:00 AM

Dear Alessandro Amaglio,

I just signed a petition addressed to you titled *FEMA: Stop the destruction of Berkeley's Historical Strawberry and Claremont Canyons!*. So far, 7 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://petitions.moveon.org/target_talkback.html?tt=tt-43334-custom-21799-20130603-7KtTiM

The petition states:

> "Stop the FEMA plan to clear-cut 85,000 historical Berkeley and Oakland trees! This destruction will be unrepairable for decades!"

My additional comments are:

> We reap what we sow, eventually.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=864855&target_type=custom&target_id=21799

Laila Selk
La Honda, CA

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From: Jamie Robertson
To: EBH-EIS-FEMA-RIX
Subject: PLEASE STOP
Date: Monday, May 20, 2013 12:10:58 PM

I am aware of your intention to make the Berkeley/Oakland area "safer" by cutting down thousands of trees and then to use herbicide to prevent regrowth. Please do NOT do this.

Jamie Brooks Robertson, J.D

New from CHCF: **End-of-Life Choices**

Trends in end-of-life care show that not only does the care given vary widely from region to region and hospital to hospital, but also patients often don't get the care they prefer. See the report and video from the Sacramento briefing.

From: Randy Lam<lchops@att.net>
To: EBH-EIS-FEMA-RIX
Subject: FEMA support - East Bay Hills - YES
Date: Monday, May 20, 2013 11:59:23 AM

5/20/2013

Dear Sirs:

I am writing this to express my strong support for FEMA's plan to eliminate eucalyptus trees (and other species) from the Berkeley/Oakland Hills area, near Strawberry Canyon, and replant with local species.

I am a homeowner in the Urban Wild Fire Exposure zone, in Oakland, CA, and understand the necessity of removing these trees. They are not indigenous, but rather an invasive species that competed successfully with native species. When left unattended, these massive trees grow to become prime candidates for feeding a raging uncontrollable fire, and therefore should be removed and treated such that they will not regenerate.

Please continue with your plan to remove the aforementioned eucalyptus trees, for fire prevention and to order to protect and regain the natural environment of the area.

Sincerely,

Randall Lam
5879 Skyline Blvd
Oakland, CA 94611
510 595 1243

Randall Lam
Confidentiality: once email is sent, I have no control over it. Therefore, you can send, copy or obliterate all or any portions of this communication as you desire, as I respect First Amendment rights.

From: walter@ratcliffconsultants.com
To: EBH-EIS-FEMA-RIX
Subject: Comments: Hazardous Fire Risk Reduction Environmental Impact Statement East Bay Hills, California April 2013
Date: Monday, May 20, 2013 12:25:23 PM

Gentlemen;
With regard to the plan for removing eucalyptus, Monterey pine and acacia trees from the Berkeley/Oakland Hills area, I would like to state my qualified support. This is a unique area that is close to cities, so precautions should exceed what the plan states. In particular, herbicides should be avoided except where physical alternatives are ineffective:

1. Substitute grazing and manual clearing for foliar application of herbicide. Use herbicides exclusively for killing tree stumps.
2. Increase the distance from herbicide use to watercourses from 60 to 120 feet.
3. Increase the no-pesticide use rule to 48 hours of a forecast rain event (or enough time to ensure degradation of the active ingredients).
4. Remove Monterey pine only when the tree is dangerous, dying or dead. These are slow-growing trees that provide forest cover while adding minimally to fire load.
5. Use the Oakland Creeks 50 foot buffer from watercourses in the Berkeley Hills area as well. Tracked equipment and skidders should be avoided in watercourses, even dry ones, because turbidity kills fish and amphibians. Residents have been trying to bring back fish and amphibians to urban creeks for years. FEMA shouldn't be working at cross-purposes.

In summary, litigation can be as costly as major fires. Litigation resulting from mass herbicide use close to urban areas is not a risk; it's guaranteed. Since litigation is a known consequence of this strategy, the budget should cover it explicitly. As a resident of the Oakland Hills and a taxpayer, I would far prefer that honest labor be substituted for litigation.

Sincerely,
Walter Ratcliff

Ratcliff Consultants, Inc.
510.658.0583 (office)
510.220.4525 (cell)

www.ratcliffconsultants.com

From: Jane Pipkin
To: EBH-EIS-FEMA-RIX
Subject: Oakland - Berkely
Date: Monday, May 20, 2013 11:44:09 AM

I'm writing to tell you I'm opposed to the radical clear-cutting of many trees followed by subsequent spraying of herbicide. There are other ways to reduce fire hazard besides removing habitat and applying herbicide which will only toxify the ecosystem.

Sincerely,

--Jane Pipkin
Aiken, SC

From: David Andrew S. Escobedo
To: EBH-EIS-FEMA-RIX
Subject: I"m the 16th signer: "FEMA: Stop the destruction of Berkeley"s Historical Strawberry and Claremont Canyons!"
Date: Monday, May 20, 2013 11:35:54 AM

Dear Alessandro Amaglio,

I just signed a petition addressed to you titled *FEMA: Stop the destruction of Berkeley's Historical Strawberry and Claremont Canyons!*. So far, 16 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://petitions.moveon.org/target_talkback.html?tt=tt-43334-custom-21799-20130603-7KtTiM

The petition states:

> "Stop the FEMA plan to clear-cut 85,000 historical Berkeley and Oakland trees! This destruction will be unrepairable for decades!"

My additional comments are:

> FEMA needs to be stopped!

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=865410&target_type=custom&target_id=21799

David Andrew S. Escobedo
monterey park, CA

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From: Alana Price
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyon plan
Date: Monday, May 20, 2013 11:18:31 AM

Dear FEMA,

I am writing to urge you to find an alternate solution to the fire hazard in Strawberry and Claremont Canyon -- a solution that does not involve the highly toxic herbicide Roundup, and that does the environmentally responsible thing of replanting trees where trees are cut down. So many health problems have been linked to the accumulation in chemicals such as Roundup in our environment. I stand firmly against this plan and ask you to find another solution.

Sincerely,
Alana

From: Ashwin Manthripragada
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Monday, May 20, 2013 11:08:21 AM

Dear City of Berkeley, City of Oakland, UC Berkeley, CalEMA, East Bay Regional Parks District and FEMA,

I have read the FEMA plans to clear-cut the trees in the Berkeley/Oakland Hills area. This is an outrage. I don't think that this is a wise way to go about fire prevention, especially your use of extremely toxic chemicals such as RoundUp. I also don't like the way that you have not included the community more proactively regarding this potential major change to our ecosystem.

Please let me know how I can be involved in finding alternate solutions.

Sincerely,
Ashwin Manthripragada

From: Hills Conservation Network
To: EBH-EIS-FEMA-RIX
Subject: 2,628 signers: Stop the deforestation of the Berkeley/Oakland Hills petition
Date: Monday, May 20, 2013 10:51:02 AM

Dear FEMA,

I started a petition to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, the petition has 2,631 total signers.

You can email all petition signers by clicking here:
http://petitions.moveon.org/target_talkback.html?tt=tt-42455-custom-21317-20130603-R0C8wU

The petition states:

> "The current Draft EIS is unacceptable as it will inflict enormous environmental damage, expose the public to thousands of gallons of toxic herbicide, destroy raptor habitats, destabilize steep slopes, and actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing more than 50,000 trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

To download a PDF file of all your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=865297&target_type=custom&target_id=21317

Thank you.

--Hills Conservation Network

If you have any other questions, please email petitions@moveon.org.

The links to download the petition as a PDF and to respond to all of your constituents will remain available for the next 14 days.

This email was sent through MoveOn's petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=xH6bm7btHgt1XQnAc8fwEiBFQkgtRUlTLUZFTUEtUklYQGZlbWEuZGhzLmdvdg--&petition_id=42455.

From: Brent Rubey
To: EBH-EIS-FEMA-RIX
Subject: Stop the clear cut!
Date: Monday, May 20, 2013 10:20:43 AM

If this moves forward I will do everything in my power to remove you from office. You will lose your job!

From: Kira Edwards
To: EBH-EIS-FEMA-RIX
Subject: For Real - You have got to be kidding - Clear Cutting should be banned
Date: Monday, May 20, 2013 10:04:37 AM

Berkeley and Oakland does not need such destruction

DO NOT CUT DOWN TREES IN STRAWBERRY CANYON
DO NOT POUR TOXIC CHEMICALS ONTO THE LAND THAT LEADS INTO OUR WATER TABLE

Thank you
Kira

--
Kira Edwards
Sydney & Company LLC
(808) 212-3837 cell phone

From: James Butler
To: EBH-EIS-FEMA-RIX
Subject: The plan
Date: Monday, May 20, 2013 9:55:33 AM

Hello,

Please help our community. We want to be safe, but we want to keep the tremendous beauty too.

1) Removal of eucalyptus trees makes sense. FEMA should pay to cut them down ONLY if the local orgs are willing to replant/reseed with local trees to speed recovery.

2) Clear cutting and leaving "up to a 24" thick layer" of kindling on the ground sounds like making the place look ugly AND leaving it a fire hazard.

3) The maps do not look like firebreaks. Firebreaks are 300 feet of no fuel.

MAKE FIREBREAKS.

Clear overgrown underbrush.

DO NOT CLEAR CUT (except for eucalyptus)

Thank you.

James Butler

From: jcomeauictx@gmail.com on behalf of John Comeau
To: EBH-EIS-FEMA-RIX
Subject: clear-cutting in Berkeley
Date: Monday, May 20, 2013 9:38:24 AM

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http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees is this some kind of a sick joke? Maybe clear-cut Yosemite while you're at it. And whereever there are large numbers of people there is a crime hazard, so maybe you should nuke San Francisco and Los Angeles. After all, you prefer safe death over dangerous life.
--
John Comeau <jc@unternet.net>
http://jcomeau.unternet.net/

From: Mark Purdy
To: EBH-EIS-FEMA-RIX
Subject: Proposal to raze and poison Strawberry Canyon in Berkeley is WRONG!
Date: Monday, May 20, 2013 9:32:40 AM

I'm penning this as a citizen of this area for the last 37 years, many hours of which were spent, as countless others do, jogging or hiking the canyon trail, providing both a great exercise and natural beauty appreciation experience. The evergreen copses which line the trail are of particular value in their beauty and habitat capacity.

The thought of a 2' deep pile of chip that have been doused with toxic *Roundup,* is nothing less than horrifying. Trees like these come only with decades of gradual growth, and there are better ways to protect the canyon, such as clearing breaks around these groves.

I want to add to the chorus of people vehemently opposed to such drastic and toxic procedures being waged against one of Berkeley's few remaining natural areas.

Shame on You!!
Mark C. Purdy
Resident of: Oakland, Berkeley, and El Sobrante for 37 years.

From: Victor Sella
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyon
Date: Monday, May 20, 2013 9:22:57 AM

We urge you to cease and desist from the draft EIS plan to cut 85,000 trees from Strawberry Canyon (as well as spraying herbicide on the land) and to choose another, more environmentally friendly plan that does not destroy life in order to save life.

These trees are our neighbors and friends and have the right to be protected. As a stakeholder and interested party in the East Bay, I speak directly to the representatives at FEMA and request you to propose another plan that does not harm our beautiful land, our trees, and does not put poison in the earth.

There MUST be more ideas and resources to work with than just clear cutting 85,000 trees. This is unacceptable and will not be tolerated.

Thank you for hearing my and my community's strong resistance to this plan.

From: tomla
To: EBH-EIS-FEMA-RIX
Subject: oakland/berkeley hills tree thinning project comment
Date: Monday, May 20, 2013 9:21:46 AM

Dear FEMA,
Regarding the EIS for oakland/berkeley CA, it sounds like an awful lot of trees to remove. I understand clear cutting is cheaper, but wouldn't judicious thinning do the same thing and preserve a little wildlife character? if you do end up clearcutting, I hope there is a plan to replant quickly. Less tree cutting and more aggressive homeowner fire prevention should be a priority.
Sincerely,
Tom Laporta

From: V Tancredi-Ballugera
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project
Date: Monday, May 20, 2013 9:20:19 AM

I don't see a problem with removing the Eucalyptus and non-native trees that were mistakenly planted for profit in the early 1900s. I'd like to see native plant life restored, but I support this action.

Victor Tancredi
Oakland

From: Doc Holliday
To: EBH-EIS-FEMA-RIX
Subject: RE: East Bay Project Tree Removal!
Date: Monday, May 20, 2013 9:19:21 AM

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http://milliontrees.me/2013/05/09/nearly-a-half-million-trees-will-be-destroyed-if-these-east-bay-projects-are-approved-revised/

Subject: East Bay Project-Nearly A Half Million Trees Will Be Removed
Date: May 20th, 2013

To Whom it may concern:

I'm writing to express my comments on the planning of removing of almost a half million trees as noted in the story at above link.(East Bay Project) I believe that doing this will create even more long term problems in the future. Trees naturally protect against erosion where the wood chips will not. And, if the wood chips were to catch fire at any time, the fires would burn down deep into the mulch making it even harder to stop the burning. Just as underground roots can burn for weeks causing more erosion and further spread of fires. Then there is the destruction of the beauty these trees provide from anyone who looks upon them will be gone. There are other reasons besides the ones mentioned above, that should be considered before authoring a project such as this. The foremost being the voice of the people in this matter to do this with taxpayer's funds which can be more well spent on more important things. In these days of hard economic times this is a wasted project to say the least.

I am shocked by the way the government throws money around for dumb projects such as these!

Sincerely,
Alfred Zlotopolski

From: Caroline Taymor
To: EBH-EIS-FEMA-RIX
Subject: Concerns about the proposed fire hazard reduction by cutting trees in the East Bay Hills
Date: Monday, May 20, 2013 9:18:42 AM

To Whom It May Concern,
I'm an Oakland resident. I'm very concerned that the proposed plan to cut down non-native trees, spread the wood chips, and treat the stumps with herbicides will be detrimental for the community. The plan does not include a plan to plant native trees to replace the non-native trees being cut. In China Camp, a similar plan to cut non-natives down to reduce fire hazards was accompanied with a plan to replant trees, and even with the replanting of trees, the hills have stayed mostly bare. Most of the replanted trees did not take. Given the serious threat of Sudden Oak Death in the Bay Area, threatening not only various California Oak species, but also Bay Laurels, Madronas, and recently even some redwoods and firs, destroying trees which provide animal habitats, and prevent erosion without planting natives and making active efforts to replace the removed trees with native plants is faulty. This plan is unacceptable without a serious plan to replant native trees and species to replace the non-natives cut down, and without consideration as to how herbicides might be used most sparingly, if at all.
Sincerely,
Caroline Taymor
Oakland Resident

--

Caroline Taymor
ctaymor@gmail.com
415-302-2416

From: Ross Hutcheon
To: EBH-EIS-FEMA-RIX
Subject: proposed East Bay Hills Hazardous Fire Risk Reduction
Date: Monday, May 20, 2013 9:17:35 AM

We support the proposed actions analysed in the East Bay Hills Hazardous Fire Risk Reduction Environmental Impact Statement. The three public agencies need to manage their lands for wildfire safety. Annually, we as private property owners are required to maintain defensible space around our homes to reduce the risk from wildfire. Public agencies need to do their part to make our communities safer.

It appears to balance hazardous fire risk reduction with concerns for the environment. It has addressed the concerns raised about the removal methods and impacts to plant and animal species. It has evaluated an additional 45 similar projects as connected actions. The proposed actions offer potential not only reduce risk of wildfire, but also to improve habitat, water quality and biodiversity. The “No Action Alternative” is not acceptable. FEMA should find in favor of the proposed actions and fund the applications.

Do not let the vocal minority stall these projects any further at the risk of another major wildfire. The proposed hazardous fire risk reduction projects need to be completed. The EIS shows they can be done while protecting environmental concerns. Finalize the EIS and allow the work to begin.

Regards
Ross & Lynn

Sent from my iPhone

From: Tim Cull
To: EBH-EIS-FEMA-RIX
Subject: Subscribe
Date: Monday, May 20, 2013 9:11:26 AM

From: Tim Cull
To: EBH-EIS-FEMA-RIX
Subject: public comments for east bay hills fire risk reduction
Date: Monday, May 20, 2013 11:34:25 AM

Hello,

I'd like to submit my public comments for the East Bay Hills fire risk reduction project.
http://ebheis.cdmims.com/ContactUs.aspx

While I do support a reduction in fire hazard and the removal of non-native species, I'm concerned about the way this project will be carried out. Specifically:

1) it sounds like entire forests of trees will be cleared out in one fell swoop, leaving a devastated landscape that is ugly, prone to landslide, and a terrible habitat for wildlife. I'm also skeptical that the intent to preserve native species described in the environmental impact report will actually be followed in practice.

2) herbicides will be used in fairly large quantities. Even with the protections described in the environmental impact statement (60 buffer to water, hand application to stumps) I still think that's too much herbicide. I'm also skeptical that the precautions described in the environmental impact report will actually be followed in practice.

3) I want to re-iterate that I am concerned about landslides in the abated areas.

4) There isn't any replacement planting involved, which means it will take a hundred years or more for native woodland to fill in with anything like the forest we have now.

I would like to see the following changes to the plan:

1) replacement planting with native trees like bay, oak, and redwood

2) even stricter policies around herbicides, as well as some description of how the policies will be enforced and some mandatory penalties for contractors who do not follow the policies.

3) graduated cutting of sections of trees instead of doing entire hillsides all at once.

4) specific penalties for contractors who "accidentally" destroy native plants and trees while cutting down non-native ones.

Thank you,

Tim Cull
1438 Grizzly Peak Blvd
Berkeley, CA 94708
510.409.5418

From: Susan P
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyons and Oakland
Date: Monday, May 20, 2013 8:58:05 AM

I heard you were planning to chop down the trees and pour and pout 1400 gallons of herbicide with Roundup in it. Do you know Roundup (maker Monsanto) contains glyphosate, and studies have linked it to cancer, allergies, infertility, autoimmune diseases... not to mention destroying the soil. DON'T DO IT!

Susan

From: Craig Hall
To: EBH-EIS-FEMA-RIX
Subject: Keep the removal, remove the herbicide
Date: Monday, May 20, 2013 8:57:36 AM

I'm writing to urge you to move forward with these necessary fire reduction strategies, but with the vital request to not spray herbicides at all. While realizing that the removed tree species aggressively regrow basal shoots from their stumps, the application of poison to these natural habitats is unacceptable. Please consider mobilization of volunteer basal shoot trimming teams for the short term and engaging with the local universities to develop longer term herbicide-free solutions.

Thank you,
Craig Hall

From: Morgen Humes
To: EBH-EIS-FEMA-RIX
Subject: Opposed to tree removal in Berkeley and Oakland
Date: Monday, May 20, 2013 1:43:20 PM

Sincerely,
Morgen Humes
2550 Leavenworth St. #3
San Francisco, CA 94133

From: Harry Patsch
To: EBH-EIS-FEMA-RIX
Subject: Support for the removal of Eucalyptus trees and other non-native vegetation in the East Bay (Oakland and Berkeley)
Date: Monday, May 20, 2013 1:22:40 PM

I strongly support the proposal to remove the non-native trees as put forward in the plan. I am a surviving resident of the Oakland Hills fire of 1991.

I strongly urge you to understand that the opposition seems to be relatively uninformed about the process proposed, and is willing to downplay or ignore the very real fire danger presented by these non-native species.

Removal will at least allow the chance for native species to reestablish themselves.

Thanks for listening.

Harry Patsch
6696 Pine Needle Drive
Oakland CA 94611-1010
510-295-8319 cell

From: Marilyn Goldhaber
To: EBH-EIS-FEMA-RIX
Cc: Nat Goldhaber
Subject: Please approve the EIS without further delay
Date: Monday, May 20, 2013 1:17:32 PM

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

Re: Support of EIS for East Bay Hills

Dear FEMA,

We strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. We believe the EIS findings of improved fire safety and likely long-term improvements to the native landscape should move forward without delay. According to the EIS. the proposed projects appear to balance hazardous fire risk reduction with concerns for the environment. The EIS has addressed the concerns raised about the removal methods and impacts to plant and animal species. It has evaluated an additional 45 similar projects as connected actions. The proposed actions offer potential not only reduce risk of wildfire, but also to improve habitat, water quality and biodiversity. The "No Action Alternative" is not acceptable. FEMA should find in favor of the proposed actions and fund the applications.

Sincerely, Marilyn and Nat Goldhaber

From: Pat & Jeff Warner
To: EBH-EIS-FEMA-RIX
Subject: Tree cutting in Berkeley
Date: Monday, May 20, 2013 1:01:56 PM

Cutting thousands of trees in the Berkeley hills does not make any sense.

Pat & Jeff Warner
213-221-7607 NOTE NEW PHONE NUMBER
Los Angeles, CA 90012

From: Catherine Campaigne
To: EBH-EIS-FEMA-RIX
Subject: No Clearcutting in Berkeley
Date: Monday, May 20, 2013 12:37:16 PM

I am adamantly opposed to the FEMA proposal to remove 85,000 trees in Berkeley and Oakland. There are other solutions to preventing fires than removing the trees, which help with global warming by providing shade, oxygenate our air that is clogged with carbox dioxide. I am opposed to the use of chemical herbicides like Roundup to remove vegetation.

I will be contacting all my Berkeley and Oakland friends about this.

Catherine Campaigne
835 Peralta Avenue
Berkeley CA

From: pgb@igc.org
To: EBH-EIS-FEMA-RIX
Subject: an apology, perhaps
Date: Sunday, May 19, 2013 8:04:58 PM

I may owe you an apology for a harsh email I sent this morning. I reacted to information about a proposal regarding clearcutting in the Hills, and the possible use of roundup. It appears that there may be a range of proposals here. I do understand the need for removing eucalyptus and Monterey Pine, but I would be against clearcutting. This leads to erosion. Also, red tailed hawks and other species have adapted to eucalyptus. These introduced trees should be removed gradually. I do believe firmly that clearing excessive underbrush and gradual removal of flammable trees would be an effective strategy against fires, while clearcutting would cause ecological damage. I saw where native trees would not be cut, I strongly hope this is true. I would oppose the use of Roundup if this is being proposed. I apologize for the harsh earlier message, but do strongly request that you take these ideas into consideration and take a long hard look at the issues.

Thank you,

Paul Belz
Oakland

From: Ari Nave
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyon Fire Plan
Date: Tuesday, May 21, 2013 12:19:47 PM

Simply removing fuel en mass is not a good fire management practice within chaparral ecosystems. This combined with herbicide seem culturally inappropriate. I strongly suggest alternative approaches be considered that are more restorative to local native flora that allow for controlled burns.

Regards,
Ari Nave, Ph.D.

R/GA 35 South Park, San Francisco, CA 94107, USA
www.rga.com www.twitter.com/rga www.facebook.com/rga

The Agency for the Digital Age™

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From: Charlotte Houston
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Tuesday, May 21, 2013 1:08:40 PM

To Whom It May Concern,

The clear cutting of these trees would truly be devastating. I cannot help but wonder how such a plan is even being considered. Not only would you be removing a mass amount of trees which are an essential part of our ecosystem, but then to spray herbicide in the area afterwards? This is completely unbelievable. I do not feel the need to send statistics your way, as I am sure you are by now well aware of the problems this clearing could cause. I simply wish to voice that I STRONGLY oppose this move.

Regards,

Charlotte

From: dorothyberndt
To: EBH-EIS-FEMA-RIX
Subject: San Francisco East Bay Hills EIS
Date: Tuesday, May 21, 2013 11:46:20 AM
Attachments: CCE05212013_00000.pdf

Please see attached letter supporting the wildfire hazard mitigation project for the San Francisco East Bay Hills EIS..

D. A. Berndt

DOROTHY A. BERNDT
ATTORNEY AT LAW
55 OAK RIDGE ROAD
BERKELEY CALIFORNIA 94705
TELEPHONE 510-849-1102
FACSIMILE 510-849-1093

FEMA
P.O. Box 72379
Oakland, CA 94612-8579

Re: Support of EIS for East Bay Hills

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term enhancement to the land should move forward without delay. We Claremont Canyon residents know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive.

Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,

Dorothy Berndt
and
John Riddle

From: Erin
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Clairemont canyons clear cutting
Date: Tuesday, May 21, 2013 9:43:29 AM

To whom it may concern,

I am horrified and outraged to hear of UC Berkeley and FEMA's plan to clear cut over 85,000 trees out of both the Strawberry Canyon and Clairemont Canyon areas in the Oakland Area, especially with no plans to replant the area. Not only does this make no sense but to say it is to prevent fires is absolutely ridiculous. It is even more despicable to hear that you haphazardly plan to douse the entire area with Monsantos Round-up herbicide! What are you thinking?!?! This is a most erroneous plan and giving the citizens who live in the area little to no notice of the plan or time to respond/come to public hearings is despicable. This is not your land to do with what you want, it is public land and it belongs to everyone. Not only will you be destroying thousands of acres of pristine land but you will be displacing any and all wildlife that calls this area home. I am writing to state I am 100% against what you are doing and say your motives are questionable at best. I will do my best to make sure everyone I know is aware of your plans.

Sincerely
Erin Whitford

Have an absolutely fabulous day

From: Gerta Farber
To: EBH-EIS-FEMA-RIX
Subject: TO FEMA
Date: Tuesday, May 21, 2013 11:24:45 AM

I WANT TO ADD MY CONCERN TO THIS REQUEST OF MY NEIGHBOR'S. GERTA FARBER 2951 DERBY ST. #113 BERKELEY 94705

Dear FEMA,

Thank you for taking comments.

Last year there was a car fire in the parking lot on Clark Kerr Campus at the foot of Claremont Canyon. While the Fire Department was putting out the fire they noticed a huge wood chip pile in front of a long ago abandoned building just at the edge of the hill, and told UCB to get rid of it ASAP as it is a huge fire risk.

A year later the wood chip pile remains and in fact UCB has even added to it.

If UCB is so concerned about fire prevention perhaps they could start by complying with the requests of our local fire department.

Also a couple of years ago UCB removed a large group of beautiful old oaks on Clark Kerr, replacing them with palm trees, all of which are now dead or dying as palm trees aren't native to Northern California.

Thank you,
Autumn Dann
Berkeley, CA

From: HBS Khalsa
To: EBH-EIS-FEMA-RIX
Subject: Tree Destruction
Date: Tuesday, May 21, 2013 11:34:25 AM

I as a US citizen and taxpayer along with other California residents are outraged at the plan to to chop down 22,000 trees in Berkeley's historic Strawberry and Claremont Canyons and over 60,000 more in Oakland. We demand that this plan be immediately and permanently cancelled!

Most sincerely,
Hari Bhajan S. Khalsa
1622 Preuss Rd. LA CA 90035
310-275-0575

From: Jan Boudart
To: EBH-EIS-FEMA-RIX
Subject: I"m the 30th signer: "FEMA: Stop the destruction of Berkeley"s Historical Strawberry and Claremont Canyons!"
Date: Tuesday, May 21, 2013 11:44:07 AM

Dear Alessandro Amaglio,

I just signed a petition addressed to you titled *FEMA: Stop the destruction of Berkeley's Historical Strawberry and Claremont Canyons!*. So far, 31 people have signed the petition.

You can reach me directly by replying to this email, **but if you'd like to email all petition signers, click here:** http://petitions.moveon.org/target_talkback.html?tt=tt-43334-custom-21799-20130604-oQ1hfS

The petition states:

> "Stop the FEMA plan to clear-cut 85,000 historical Berkeley and Oakland trees! This destruction will be unrepairable for decades!"

My additional comments are:

> Stop killing trees and other living things -- especially humans!

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=866658&target_type=custom&target_id=21799

Jan Boudart
Chicago, IL

This email was sent through MoveOn's public petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you have any questions, please email petitions@moveon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=r9qg6n6KYrWzHTupglRoCkVCSC1FSVMtRkVNQS1SSVhAZmVtYS5kaHMuZ292&petition_id=43334 .

From: Jeff
To: EBH-EIS-FEMA-RIX
Subject: Keep FEMA Out of Berkeley
Date: Tuesday, May 21, 2013 12:08:32 PM

To Whom It May Concern,

Do not allow FEMA near the city limits of Berkeley. The reasons are legion. The plan is absurd.

Jeff Williams
Berkeley, Ca

From: Maoz, Karen
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills
Date: Tuesday, May 21, 2013 10:52:06 AM

Please do not use pesticide in our hills. Also, please leave the native, historic trees in our hills.
Thanks

From: Mary McBride
To: EBH-EIS-FEMA-RIX
Subject: Use of herbicide, Round-up, for the partial deforestation East Bay hills project
Date: Tuesday, May 21, 2013 10:39:56 AM

Please reconsider the use of the herbicide, Round-up, for this project. Its neurotoxicity properties are established and the threat of it getting into the bay via run-off is of particular concern.

Thank you,
Mary McBride
1716 Vine Street
Berkeley, CA 94703

From: Miss Irene
To: EBH-EIS-FEMA-RIX
Subject: I STRONGLY OPPOSE ANY CLEAR CUTTING IN STRAWBERRY AND CLAREMONT CANYON.
Date: Tuesday, May 21, 2013 10:37:09 AM

It is DISGUSTING that FEMA is actually considering a plan to chop down 22,000 trees in Berkeley's historic Strawberry and Claremont Canyons, then chop down 60,000 more in Oakland.

It is DISGUSTING that UC Berkeley has applied for a grant that would effect this destruction by claiming that the trees pose a fire hazard. The school has no plans to replant, and instead will cover 20% of the area in wood chips two feet deep. To add further insult to the environment, UC Berkeley wants to up to 1400 gallons of herbicide, including the highly toxic Roundup, to prevent re-sprouting. The trees in Strawberry and Claremont Canyon have been there for decades and hardly constitute a "hazard." But pouring up to 1400 gallons of herbicide into these hills will create a GENUINE hazard.

I thought FEMA was supposed to manage emergencies, not oversee one! Furthermore, how the federal government justify this expense while Head Start and public housing programs are being cut due to the sequester.

It is further DISGUSTING that FEMA cleverly scheduled its three public meetings for mid and late May while UC Berkeley students were in finals or gone for the summer. But these are my comments, which I want included in the official record. The University and FEMA should be ashamed for even considering such a horrendous solution to a problem that DOES NOT EXIST! Deforestation is an abomination to the planet, affecting water tables, wildlife, climate and air quality. Herbicides are another abomination, which directly impact ground water.

I STRONGLY OPPOSE ANY CLEAR CUTTING IN STRAWBERRY AND CLAREMONT CANYON.

Irene Mills

2174 NW Davis #402

Portland Oregon 97210

503.525.2287

From: Susan Colson
To: EBH-EIS-FEMA-RIX
Subject: Clear-cutting the Berkeley/Oakland hills is a bad idea
Date: Tuesday, May 21, 2013 12:07:31 PM

This will not prevent fires, it will fuel fires. It will not allow native species to thrive, it will cause invasive species to thrive. Please develop a more nuanced response to whatever problem you hope to solve by this benighted action.

Susan Colson

Susan Colson
Organization Consultant
4018 Forest Hill Ave.
Oakland CA 94602
(415)235-9215
sucolson@me.com

From: Tom Sydow
To: EBH-EIS-FEMA-RIX
Subject: Clear cutting trees in Berkeley and Oakland Hills
Date: Tuesday, May 21, 2013 10:12:54 AM

Hello,

I am very concerned to hear that FEMA is planning on cutting down 80,000 trees in the east bay. The woods in the hills provide lots of recreational enjoyment for the citizens of this area, and are very valuable places of learning for young people. Forests also provide clean air, which we desperately need in this world. I enjoy hiking in these hills at least once a week, and if this plan happens, I don't know what I will do. This is unbelievable.

Do not cut down any trees in this area. People need access to forests. The plan is to put down Round Up pesticides on wood chips. Who benefits from this? Round Up is toxic. It'll run down the hills into the urban environment. This is far more dangerous for people's long term health than a possible forest fire.

DO NOT CUT DOWN TREES IN THE EAST BAY.

Thank you.

Tom

From: Barbara Goldenberg
To: EBH-EIS-FEMA-RIX
Subject: Support of EIS for East Bay Hills (California)
Date: Tuesday, May 21, 2013 1:55:13 PM

Dear FEMA - I have been involved in Wildfire Prevention and environmental issues in Oakland for the last decade.

I strongly support the wildfire hazard mitigation projects for the East Bay Hills, and feel that the studies have taken a long enough time. I think the EIS is very comprehensive, and addresses concerns raised in the past, and is quite sensitive to enviornmental issues and habitat issues.

I believe this EIS should move forward ASAP. As a resident in the Oakland Hills during the 1991 fire I remember well how quickly that fire spread through the canopy of large and unruly Eucalyptus and Pines.

Thanks for your support of the important work of diminishing the quantity of invasive trees, and the follow up to discourage regrowth.

Please approve the EIS as soon as possible.

Sincerely
Barbara Godlenberg
6960 Paso Robles Dr, Oakland, CA 94611

From: Gay Sweet Scott
To: EBH-EIS-FEMA-RIX
Subject: Oakland Hills Project
Date: Tuesday, May 21, 2013 1:32:05 PM

Please--
do not spend thousands of dollars to denude the Berkeley/Oakland hills.
I understand fear of fire, I understand the fervor of the native plant enthusiasts who support eradication of anything their regard as non- native.
However, the whole sale disturbance of a complex well established ecosystem is not in anyone's interest and will lead to serious environmental consequences.
FEMA must concentrate on directing its resources wisely instead of trendy interventions.

Sincerely yours,
G. S. Scott

From: Mary Breunig
To: EBH-EIS-FEMA-RIX
Subject: Strawberry Cyn, etc. fire safety project
Date: Tuesday, May 21, 2013 2:38:26 PM

Hello-

I am of the opinion that cutting down invasive species' trees may be ok but I would be heartbroken if native species trees were included in this project. I do believe in clearing underbrush as well every so many years. Underbrush does come back and then it has to be trimmed back again, etc. Please no clear cutting. thank you.

Mary Breunig
2709 McGee Ave
Berkeley CA 94703
510 549 0689

From: ryanf
To: EBH-EIS-FEMA-RIX
Subject: Regarding FEMA"s planned tree removal
Date: Tuesday, May 21, 2013 2:58:47 PM

I have been a Bay Area Resident my entire life, and it is with disgust and horror that i write this email in protest of the planned tree removal in the Claremont and Strawberry Canyons. Please do the right thing and protect what is left of Bay Area wilderness. If fire danger is enough of a reason to remove life, we won't have anything left by the time you're done.

Sincerely,
Ryan Farrell

Berkeley Teacher

From: Stephanie Huie
To: EBH-EIS-FEMA-RIX
Subject: Plan to cut down trees in Berkeley/Oakland
Date: Tuesday, May 21, 2013 3:02:06 PM
Attachments: image016.png
image017.png
image018.png
image019.png

I'm writing to let you know that I think it's a horrible plan to raze the trees, but an even worse plan to use Roundup to prevent regrowth. These are areas where the elderly, children and other people live and play, so it is utterly irresponsible to even contemplate drowning these areas in 1400 gallons of poison. What are you people thinking? Please reconsider; UC Berkeleyites should be smarter than this!

Stephanie Huie
Office Manager

1726 Solano Avenue

Berkeley, CA 94707

866-507-7444 Toll Free
510-524-6700 Local
510-524-4092 Fax
shuie@seniorhelpers.com

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From: Chelsey D
To: EBH-EIS-FEMA-RIX
Subject: Please do not cut down Oakland/Berkley Trees!
Date: Tuesday, May 21, 2013 4:56:50 PM

It is horrible a plan like this exists. Trees in this area are essential. There needs to be more discussion and public awareness before this plan moves forward!

From: David Fleisig
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills EIS
Date: Wednesday, May 22, 2013 7:43:32 AM

My family lost its home in the 1991 fire and a lifetime of irreplaceable pictures and memorabilia. Since then we rebuilt our home and still live on the same site. We, as private property owners, must and do maintain defensible space around our home to reduce the risk from wildfire. Public agencies need to do their part to make our communities safer.

Please accept the draft EIS and fund the proposed actions. The three public agencies need to manage their lands for wildfire safety. There have been enough studies and analyses of these projects. The projects have been delayed too long. They need to be completed to make our communities safer from wildfire. We don't want to have to live through another fire like the one in 1991.

We support the proposed actions analyzed in the East Bay Hills Hazardous Fire Risk Reduction Environmental Impact Statement.

David Fleisig

1060 Amito Dr.

Berkeley, 94705

From: David Williamson
To: EBH-EIS-FEMA-RIX
Subject: Support for Draft EIS
Date: Tuesday, May 21, 2013 8:59:14 PM

Greetings, FEMA.

As a nearby resident, and an active hiker in Claremont Canyon, I urge you to undertake the proposed action to reduce the fire danger danger imposed by the stands of non-native eucalyptus trees.

Thank you for preparing a well-reasoned and thoroughly-researched Draft EIS.

Cheers,
Dave

David Williamson
2931 Magnolia Street
Berkeley, CA 94705
510-540-0449

From: First Last
To: EBH-EIS-FEMA-RIX
Subject: Government Gone Wild
Date: Tuesday, May 21, 2013 4:34:28 PM

Clear-cutting and round-upping the Berkeley Hills is a stupid idea that ignores the fact that the trees you want to cut have been there for decades without fires. They're not eucalyptus.

The country's been sold to bankers and foreign corporations, and you creeps are taking their orders to completely rout our once beautiful country.

That's what the global engineered collapse was all about: the bankers want to rob the world's resources and destroy environmental and labor protections. And you're helping them do it.

Next, your jobs will be eliminated. And they're be nothing left for you to do.

From: Martha Booz
To: EBH-EIS-FEMA-RIX
Subject: Clear Cutting Strawberry Canyon
Date: Tuesday, May 21, 2013 4:28:38 PM

I have been alerted by my sister and the Sierra Club about a plan proposed by UC Berkeley to clear cut Strawberry Canyon, a beautiful canyon above the campus filled with native plants and animals. The supposed reason is fire prevention. This is a terrible idea, and I am completely and fervently against it. This is not the way to guard against fire in Strawberry Canyon, or on the UC campus.

The California Native Plant Society has experts in fire danger and fire prevention among its membership. One I know is Rick Halsey, out of Escondido, CA. He understands how to protect the forest and wildlands and still mitigate fire concerns.

You must not approve this proposal. It is so destructive of our wildlands and parklands in the East Bay of the San Francisco Bay Area.

Martha L. Booz, Ph.D.
3823 Valley Lane
El Sobrante, CA 94803-3118
California Native Plant Society East Bay Chapter Email List Admin

From: mary everest
To: EBH-EIS-FEMA-RIX
Subject: reject plan to clear cut trees in the east bay hills
Date: Tuesday, May 21, 2013 5:16:14 PM

The plan proposed by UCBerkley, Oakland, and EBRPD to remove trees from the East Bay Hills area is unwise. It will not make the area any safer from forest fire. If native trees were to grow in this area, they would also be susceptible to forest fire. Scotch broom, brush, scrub and grasses are more likely to repopulate the area than trees. The trees there now provide countless valuable ecological services, such as storing carbon, preventing erosion, and providing habitat and food for raptors, bees, and many other organisms. They should be kept in place. Additionally, the herbicides proposed for the area have been shown to be toxic. This project should not be funded by FEMA. It would be a misuse of FEMA and taxpayer dollars.

--
may you be safe and protected in all ways.
may your heart be happy and peaceful.
may your body be healthy and free from pain.
may you take care of your life with ease and with joy.
--

http://maryeeverest.bandcamp.com/

From: Melody KirkWagner
To: EBH-EIS-FEMA-RIX
Subject: Please stop this destructive movement
Date: Tuesday, May 21, 2013 8:10:46 PM

The proposed hazardous fire risk reduction activities in the East Bay Hills are monumentally destructive and uncalled for. In a time when we're trying to preserve our history and our environment, FEMA is proposing the environment equivalent of killing the baby because someday he might commit a crime. Fire *is* a hazard and a difficult one to live with; destroying the reason people want to live there isn't the answer.

Melody KirkWagner

From: Nancy Lemon
To: EBH-EIS-FEMA-RIX
Cc: Phoebe Anne Sorgen; cragmont_cache@googlegroups.com
Subject: Berkeley Hills Fire Risk Reduction
Date: Wednesday, May 22, 2013 8:23:03 AM

Dear EBH-EIS-FEMA-RIX:

As you are no doubt aware, the Berkeley and Oakland hills in California are at great risk of another large fire, as we experienced several years ago.

Our household strongly supports the removal of non-native trees such as eucalyptus and acacia that greatly increase the risk of huge fires in our city.

We believe that after felling, grinding the stumps to below ground level or fixing tarps over them to deprive them of sunlight is the most economical and efficient way to prevent regrowth.

We oppose the use of herbicides such as those manufactured by Monsanto as those create many other problems.

Thanks for your attention to this very important matter.

Sincerely,

Nancy K. D. Lemon
1063 Cragmont Ave.
Berkeley, Ca. 94708

From: Pam R
To: EBH-EIS-FEMA-RIX
Cc: nancy
Subject: Berkeley CA Trees
Date: Wednesday, May 22, 2013 7:44:32 AM

Dear Sir(s):

I find the proposition to cut down all these trees and soak the ground with pesticide utterly ridiculous. The purpose of this email is to voice my opinion that THIS ACTION of CUTTING DOWN ALL THESE TREES AND SOAKING THE GROUND WITH PESTICIDE NOT BE DONE.

Thank you,

Regards,

Pamela K. Rutledge
posatv@yahoo.com
PO Box 025723 SJO4086
Miami, FL 33102

"The most important moment in my life is the present one! The most important person is the one standing in front of me this moment. And the most important action always is love" *Meister Eckhardt - (1260-1328) German theologian, philosopher and mystic*
"There is no path to peace. Peace is the path" *Mahatma Gandhi - (1869-1948)*

From: Radmila Raikow
To: EBH-EIS-FEMA-RIX
Subject: Eucalyptus trees near Wild Cat Canyon
Date: Wednesday, May 22, 2013 7:31:05 AM

To whom is in charge, or at least has some influence:

I live within view of the large grove of Eucalyptus trees in Wild Cat Canyon. I was upset to hear that there are plans to level all these trees and replace then with the wood chips of which they were made. Now I realize that it is foreseen that these wood chips will be eventually converted into something green, but I think it is most important that restoration be a prominent part of the planning. It takes a lot more work to grow something than to kill it. I also understand that the total removal of the large trees would result in a loss of their shielding us from wind and hillside slide. Replacing fire-prone, non-native trees with native trees is commendable, but this must be done slowly and carefully. Notably please avoid using pesticides and herbicides. Please start with only those trees that are next to people's homes. There is one Eucalyptus tree on Park Ave. right across from the bottom of my yard at 5871 McBryde. R. Raikow

From: Vince Blaskovich
To: EBH-EIS-FEMA-RIX
Subject: trees
Date: Wednesday, May 22, 2013 1:57:08 AM

---

please don't clear cut and poor all of that toxic Roud-up on the earth, what are you frackers? Are you working in league with Haliburton? Or are you really Satan himself, D. Cheney??

I ask why you are cutting the groves down? Fire danger, Are you doing it because we are moving into a hotter climate. You and major oil would prefer to squeeze all the life out of the globe, before my child dies? Just keeping check on the carbon level, check that it remains high?

We do not want a scorched earth, and you prepare us for one, greedy fukkers! Should I ask nicely? Right..

From: Emily Davis
To: EBH-EIS-FEMA-RIX
Cc: Emily Davis
Subject: vegetation management projects in the hills NO GO.
Date: Wednesday, May 22, 2013 1:51:02 PM

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable. There are more alternatives that are less expensive and less damaging to the hills. Other options have been proposed but ignored by FEMA. It's obvious the public does not like your plan, nor do we appreciate the secretive way FEMA presented this- hoping it would get past public eye. Please consider other options.

Thanks,
Emily Davis
Wine.com Retail Store Manager
2220 4th St.
Berkeley, CA 94710
(510) 704-8007
edavis@wine.com
Wine.com - #1 Online Wine Retailer six years in a row! (Internet Retailer)
WineShopper - NEW! Daily wine deals up to 70% off

From: Evan Bettencourt
To: EBH-EIS-FEMA-RIX
Subject: This is the dumbest thing I"ve ever heard!
Date: Wednesday, May 22, 2013 11:44:40 AM

This is not only insane, but it's counter productive! Cutting trees INCREASES the damn fire risk!

Hope you people are ready for a firestorm of pushback.

From: Gabriela Giacchino
To: EBH-EIS-FEMA-RIX
Subject: Please do not cut down Berkeley and Oakland trees
Date: Wednesday, May 22, 2013 11:00:55 AM

To Whom It May Concern,

I am writing to voice my strong opposition to the current FEMA plan to remove thousands of trees in the Berkeley and Oakland hills, then use Roundup to prevent weed growth.

Specifically, I am concerned about the following issues:

1. Why are we removing trees that have a healthful impact on our air quality?
2. What will happen to that habitat and how will animals and birds thrive there once it is doused with chemicals like Roundup?
3. Can a smaller number of trees be removed instead, or some cutting done instead? Once they are gone they will never regrow. This is a huge loss.

I believe this plan will have a very negative impact on this area and should not go forward. Please come up with a better fire management solution that does not involve the destruction of thousands of trees!

Sincerely,
Gaby Giacchino
Berkeley, CA
gaby_giacchino@yahoo.com

From: Hannah Onstad
To: EBH-EIS-FEMA-RIX
Subject: Do Not Cut Trees, Please
Date: Wednesday, May 22, 2013 12:35:04 PM

To Whom It May Concern,

I am a resident of North Oakland who uses the Tilden Park and Strawberry Canyon area for hiking and enjoyment. I am opposed to the plan to clear-cut 85,000 trees from Berkeley and Oakland.

Removing the trees is more of an overall disruption and environmental health risk—particularly the spreading of toxic herbicides such as Roundup that will be used to prevent new tree growth—than the existence of the trees themselves.

As a resident who lives in the Bay Area because of its commitment to green policies I see this as an affront to residents, and I vehemently oppose such action.

Please bring this plan back to review and try a new version: without the use of pesticides, and one that does not disrupt the landscape, require wide-scale tree removal, and poison our environment.

Thanks,
Hannah Onstad

453 59th St
Oakland, CA

From: Hills Conservation Network
To: EBH-EIS-FEMA-RIX
Subject: 3,969 signers: Stop the deforestation of the Berkeley/Oakland Hills petition
Date: Wednesday, May 22, 2013 10:52:39 AM

Dear FEMA,

I started a petition to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, the petition has 3,969 total signers.

You can email all petition signers by clicking here:
http://petitions.moveon.org/target_talkback.html?tt=tt-42455-custom-21317-20130605-f_yPhS

The petition states:

> "The current Draft EIS is unacceptable as it will inflict enormous environmental damage, expose the public to thousands of gallons of toxic herbicide, destroy raptor habitats, destabilize steep slopes, and actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing more than 50,000 trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

To download a PDF file of all your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=869253&target_type=custom&target_id=21317

Thank you.

--Hills Conservation Network

If you have any other questions, please email petitions@moveon.org.

The links to download the petition as a PDF and to respond to all of your constituents will remain available for the next 14 days.

This email was sent through MoveOn's petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=xH6bm7btHgt1XQnAc8fwEiBFQkgtRUlTLUZFTUEtUklYQGZlbWEuZGhzLmdvdg--&petition_id=42455.

From: Ian Martin
To: EBH-EIS-FEMA-RIX
Subject: Do not cut down East Bay Trees for UC Berkeley
Date: Wednesday, May 22, 2013 1:04:19 PM

As an avid hiker and lover of the East Bay Hills, I'm am shocked to learn of the proposal to cut down thousands of trees in the Strawberry and Claremont Canyon areas of Berkeley. These trees are a treasure.

I personally saw the destruction of 1991's devastating Oakland Hills Fire, so I am keenly appreciate UC Berkeley's need to keep their buildings safe from fire--but this risk needs to be weighed against destroying an East Bay treasure, a major natural resource, and Climate Change-fighting carbon sink. UC Berkeley and FEMA are most certainly aware of the perils of Climate Change which is also a major threat to their interests--as global temperatures rise, the threat of wild fires grows. A policy of destroying carbon-capturing trees to prevent fire is ultimately counterproductive, and in the end, will only increase the threat of wild fires around the country and our planet.

As an Oakland property owner, I urge FEMA and UC Berkeley to preserve this beautiful area. Do not cut down these trees.

--Ian Martin

From: julie hess
To: EBH-EIS-FEMA-RIX
Subject: Please reconsider the current EIS
Date: Wednesday, May 22, 2013 1:56:50 PM

As a resident of the area, I would appreciate it if you would look into other models to achieve your goals.

I request that youthoroughly analyze the effects on air quality resulting from the proposed plan.

Please retract the EIS and rework it to also fully consider all the implications of the expected herbicide use.

Thank you,

julie hess

From: K Lim
To: EBH-EIS-FEMA-RIX
Subject: Bad idea
Date: Wednesday, May 22, 2013 12:16:59 PM

The east bay hills fire reduction project currently in the EIS public comment phase is a terrible idea. U can put tax dollars to much better use. Back to the drawing board

K

From: Kareem Shihab
To: EBH-EIS-FEMA-RIX
Subject: Don"t cut the trees
Date: Wednesday, May 22, 2013 11:06:50 AM

Cut thousands of trees then dump herbicide all in the name of preventing fires. What about an alternative where you thin the trees to prevent fires. Your plan seems a bit extreme don't you think?

From: Karen Clothier
To: EBH-EIS-FEMA-RIX
Subject: Opposed to the plan to cut down trees in Strawberry Canyon and Claremont Canyon
Date: Wednesday, May 22, 2013 1:36:25 PM

I am outraged about the plan to cut down trees and pour poison all over our pristine hiking trails. It seems to me UC Berkeley does not give a damn about the residents of Berkeley and why people choose to live in Berkeley. Berkeley is becoming traffic choked and overdeveloped thanks to the university and now is losing it's green spaces too.

It seems like they just do whatever they want to do.
Disgusted,
Karen Clothier

--
Wise Women Rule
Supporting Wise Women to ReClaim and ReFrame Their Stories
Web: http://www.WiseWomenRule.com
Pinterest: www.pinterest.com/WiseWomenRule
FB: facebook.com/wisewomenrule

From: Karen Fiene
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: Vegetation Management Project
Date: Wednesday, May 22, 2013 1:55:37 PM

To Whom it May Concern at FEMA,

The people of Berkeley and Oakland view our trees and the natural landscape as a precious asset that should be protected and renewed, not treated like a problem that can be mitigated with destruction and use of toxic pesticides. There must be a middle path that will address legitimate concerns with thoughtful actions. We must be stewards of the land and think to future generations and not just take the easy route. Please stop a moment and listen to what we have to say and work toward a solution we can all feel good about, now and in the future.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable **because it does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS**. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because **it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity.** The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

>The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that **it does not adequately address the cost or the risks associated with the herbicide use that is being proposed**. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable **because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation**. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the

hills is unacceptable because **it does not adequately analyze the effects on air quality resulting from the proposed plan.** We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because **it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut.** This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

Sincerely,

Karen Fiene, FAIA

From: Madelyn Covey
To: EBH-EIS-FEMA-RIX; inquiries@hillsconservationnetwork.org
Subject: Don"t cut down the trees in Berkeley and Oakland!
Date: Wednesday, May 22, 2013 1:54:03 PM

Dear FEMA,

How can you think of spending money to cut down trees in an effort that will probably not even achieve its stated goal, when there are other more pressing disasters to deal with? People are still suffering from super storm Sandy, and now Oaklahoma city is in need. Cutting down non-native trees is a good idea on paper, but when there is no plan for replanting native species, it is clear that non-native grasses on other plants will simply take hold and increase the fire risk!

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

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Sincerely,

Madelyn Covey

From: Mandrake
To: EBH-EIS-FEMA-RIX
Subject: Draft EIS for UC, Oakland, and EBRPD
Date: Wednesday, May 22, 2013 1:54:29 PM

To whom it may concern.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

Thank you,

Eric Drake

From: Margret Wotkyns
To: EBH-EIS-FEMA-RIX
Subject: I am horrified by the planned
Date: Wednesday, May 22, 2013 1:06:12 PM

---

tree carnage in the Berkeley Strawberry & Claremont canyon areas
that you are planning & completely object to using Round Up anywhere! Are you in Monsanto's pockets too ?
Sent from my iPhone

From: Miriam Blatt
To: EBH-EIS-FEMA-RIX; inquiries@hillsconservationnetwork.org; Miriam Blatt
Subject: flawed EIS for destroying 100K trees in Berkeley/Oakland
Date: Wednesday, May 22, 2013 2:02:51 PM

Please start over on the EIS for the destruction of 100K trees in Berkeley/Oakland.

The current EIS is way out of line and should not be used for further planning due to:

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

>The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy. I'm opposed to broad use of herbicides that could potentially also have negative effects on animals, including human animals, for example Parkinson's disease:

http://www.greenmedinfo.com/blog/roundup-herbicide-linked-parkinsons-related-brain-damage

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

Regards,
Miriam Blatt, PhD
Menlo Park, CA

From: Nini White
To: EBH-EIS-FEMA-RIX
Subject: Proposed East Bay Tree Removal Project
Date: Wednesday, May 22, 2013 11:57:35 AM

---

re: East Bay Regional Park District, eucalyptus destruction, Federal Emergency Management Agency (FEMA), Fire Safety, herbicides, Oakland, prescribed burns, University of California at Berkeley

Public lands belong to the public, and I am a tax paying member of the "public." The money that will be used to implement these projects is my tax dollars, and I do NOT approve of these projects!!!!

These projects are more likely to **increase the risk of wildfires** than to reduce that risk.

By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will **damage the environment** by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will **endanger the public** by dousing our public lands with thousands of gallons of toxic herbicides.

* **Erosion** is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* **Non-native vegetation** such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* **Prescribed burns** will pollute the air and contribute to the risk of wildfire, endangering lives and property.

* These projects are an **inappropriate use of the limited resources** of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

From: Sharon Flanagan
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Project
Date: Wednesday, May 22, 2013 11:38:13 AM

I am a resident of the Easy Bay Hills. We are located precisely where the 1991 firestorm ravaged our neighborhood -- destroying many homes and also leading to a loss of life.

I am STRONGLY in support of the project to remove the non-native trees that contribute to the spread of wildfires. Whatever we can do to minimize fire risk should we done.

Thank you

Sharon Flanagan
84 Vicente Rd.
Berkeley, CA 94705

From: Travis Smith
To: EBH-EIS-FEMA-RIX
Subject: Re: East Bay Hills Hazardous Fire Risk Reduction EIS
Date: Wednesday, May 22, 2013 1:48:53 PM

To Whom It May Concern,

My wife and I are residents in Oakland, CA and have recently become aware of the grant applications submitted to FEMA by University of California, Berkeley (UCB), City of Oakland, and East Bay Regional Park District (EBRPD).

I have reviewed the proposed fire risk reduction actions, and am baffled at how such poor decision making has even made it to a draft proposal stage. Without a doubt, the proposed actions are egregious and preposterous. As a resident of California I am aware that the arid climate increases fire risks. Modest and reasonable actions should be taken to reduce these fire hazards. Unfortunately, the proposed actions are far from being modest or reasonable.

All of the described actions can be described as painfully excessive and reckless. The following paragraph can only be described as a dark tragedy:
"In Claremont Canyon, UCB proposes to cut down *all* eucalyptus, Monterey pine, and acacia trees on approximately 43 acres of UCB property, chip the downed trees, spread the chips over a fifth of the 43 acres, and apply herbicides to the stumps twice a year to prevent resprouting."

This extreme and haphazard strategy for Claremont Canyon is similar to the other proposed actions, and is essentially a prescription of clear cutting these forests. Such haphazard actions are the equivalent of evacuating everyone from California due to the risk of earthquakes.

Let's use reason and logic to manage the situation, instead of jumping to the insane conclusion of essentially clear cutting these beautiful areas of nature.

I urge you to either:
a.) Decline the four grant submissions from UCB, Oakland, and EBRPD.
b.) Modify your proposed actions to recognize the importance of
these forested areas, and significantly reduce the impact your actions would have on the areas.

Thank you for your time,

Travis Smith
451 59th St.
Oakland, CA
94609

From: John Oda
To: EBH-EIS-FEMA-RIX
Subject: Clear cutting
Date: Wednesday, May 22, 2013 5:16:30 PM

Sent from my iPad Please reconsider clear cutting inthe Oakland/Berkeley hills. Thank you, john oda

From: berkeleychapel@gmail.com on behalf of Chapel Administrator
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: FEMA plan for Berkeley
Date: Wednesday, May 22, 2013 5:14:40 PM

Greetings FEMA,

I am writing to say that The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is deeply problematic.

The proposed treatments will result in an environment with high flame lengths worse than with the trees that currently grow in that area. Please rework the EIS accordingly.

Also, has the environmental impact of this plan been taken into account? I am concerned about Greenhouse emissions as well as the u se of herbicides. This plan has the potential to inflict damage not only to the environment but also on us, the residents of this area.

Please rework your plan taking into account all environmental and health factors.

Thank you,

Annika Mongan

On Wed, May 22, 2013 at 1:45 PM, Hills Conservation Network <noreply@list.moveon.org> wrote:

> The massive outpouring of support for the fight to prevent the deforestation of the Berkeley/Oakland hills has been truly phenomenal.
>
> Folks showed up in huge numbers at last Saturday's FEMA public comment meeting and made it incredibly clear that the public does not want massive clearcutting and poisoning of trees. We think that FEMA heard the message loud and clear!
>
> Please join us in opposing this fraudulent waste of taxpayer money.
>
> **If you agree that cutting down close to 100,000 trees is a terribly misguided policy in times where the rest of the world is busy planting and conserving trees, please take a moment to send FEMA a comment letter.**
>
> **Remember, what FEMA needs to hear are reasons why you think the EIS is flawed. To give FEMA some ideas about what needs to be fixed, you've got to try to be as specific as you can.**
>
> Here are what we believe are some strong arguments against accepting the EIS as currently written:
>
> >The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management

projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

>The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

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Please feel free to base your comments on these statements and email them to: EBH-EIS-FEMA-RIX@fema.dhs.gov

if you want to, please cc your comments to HCN @ inquiries@hillsconservationnetwork.org

thanks so very much for your support of this important cause!

HCN
http://www.hillsconservationnetwork.org

http://petitions.moveon.org/sign/stop-the-deforestation-3?mailing_id=12441&source=s.icn.em.cr&r_by=1097978

This message was sent to brigido bautista by Hills Conservation Network through MoveOn's public petition website. MoveOn.org Civic Action does not endorse specific campaigns or the contents of this message.

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--
Annika Mongan, Administrator
University Lutheran Chapel
2425 College Avenue
Berkeley, CA 94704
tel: (510) 843-6230
email: administrator@ulcberkeley.org

From: Arlene Merryman
To: EBH-EIS-FEMA-RIX
Subject: No Destruction of our Oxygen-Producing Trees
Date: Wednesday, May 22, 2013 5:12:48 PM

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase.

We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

From: James Koss
To: EBH-EIS-FEMA-RIX
Subject: Re: Action Alert-It"s Time to Write Comments to FEMA
Date: Wednesday, May 22, 2013 5:04:04 PM

I am opposed to cutting these trees.

James Koss, MD FAEEM

On Wed, May 22, 2013 at 1:45 PM, Hills Conservation Network <noreply@list.moveon.org> wrote:

> The massive outpouring of support for the fight to prevent the deforestation of the Berkeley/Oakland hills has been truly phenomenal.
>
> Folks showed up in huge numbers at last Saturday's FEMA public comment meeting and made it incredibly clear that the public does not want massive clearcutting and poisoning of trees. We think that FEMA heard the message loud and clear!
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> Please join us in opposing this fraudulent waste of taxpayer money.
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> **If you agree that cutting down close to 100,000 trees is a terribly misguided policy in times where the rest of the world is busy planting and conserving trees, please take a moment to send FEMA a comment letter.**
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> **Remember, what FEMA needs to hear are reasons why you think the EIS is flawed. To give FEMA some ideas about what needs to be fixed, you've got to try to be as specific as you can.**
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100,000 tall trees.

>The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

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Please feel free to base your comments on these statements and email them to: EBH-EIS-FEMA-RIX@fema.dhs.gov

if you want to, please cc your comments to HCN @ inquiries@hillsconservationnetwork.org

thanks so very much for your support of this important cause!

HCN
http://www.hillsconservationnetwork.org

http://petitions.moveon.org/sign/stop-the-deforestation-3?mailing_id=12441&source=s.icn.em.cr&r_by=500752

This message was sent to James KOSS, MD, FAAEM by Hills Conservation Network through MoveOn's

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http://petitions.moveon.org/unsub.html?i=12441-500752-aT61wv

From: Elizabeth McQuade
To: EBH-EIS-FEMA-RIX
Subject: Please do not approve the East Bay Projects.
Date: Wednesday, May 22, 2013 5:02:25 PM

Hello,

Please do not approve the East Bay Projects.

These projects are more likely to **increase the risk of wildfires** than to reduce that risk.

By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will **damage the environment** by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will **endanger the public** by dousing our public lands with thousands of gallons of toxic herbicides.

* **Erosion** is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* **Non-native vegetation** such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* **Prescribed burns** will pollute the air and contribute to the risk of wildfire, endangering lives and property.

* These projects are an **inappropriate use of the limited resources** of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

Please consider these points and the overall damage that these East Bay Projects will create if they are implemented.

Simply put, if it's not broken, don't fix it.

All the best,

Elizabeth McQuade

From: Catherine Sutton
To: EBH-EIS-FEMA-RIX
Cc: Leonard Edmondson
Subject: Re: Eucalyptus removal in Berkeley and Oakland Hills
Date: Wednesday, May 22, 2013 4:43:14 PM

To FEMA,

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is inadequate for the reasons detailed below. I urge you to deny a grant to the agencies that wish to mitigate fire hazard in the Berkeley and Oakland hills by removing all the Eucalyptus, Monterey Pine, Acacias and other non-native trees and utilizing increasingly suspect herbicides to keep them from coming back. The proposed project appears to be a fraudulent waste of taxpayer money.

It is bad for the environment ...
1) it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects.
2) it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. Independent studies of glyphosate show that it is far from the benign product Monsanto would like us to believe it is.3) denuded slopes will have little to stop them sliding during rain events (which, given current trends, could be more severe than usual; (c.f. the slide behind the Bancroft library after a similar clearing)
3) it does not adequately analyze the effects on air quality resulting from the proposed plan.
4) the entire project will be a nightmare for people living nearby both during the process and for years afterwards, from the noise, the visual devastation, the chemical aftermath

...and it does not provide the most effective way to reduce fire danger
1) the draft EIS does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently.
2) it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase.
3) it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

Therefore we ask that you retract the EIS and rework it to address these serious issues.

Reducing fire risk can be accomplished in less invasive ways
1) owners should clear the ground and remove eucalyptus debris for the requisite distance around their own properties if they wish to enjoy the privilege of living in the hills
2) further clearing of debris can be accomplished by teams of volunteers who wish to preserve the look and feel of the current forests

Further thoughts
Considering that fire is a natural part of the ecological process, that drought is likely to become endemic in the Bay Area, and that we need to be reducing miles traveled (and planting MORE trees rather than cutting down 100,000 of them) to keep GHG emissions to a minimum, why not encourage the people who live in harm's way to relocate to more populated areas? Given the increasing number of disasters affecting homes (tornadoes, floods), I'm sure you must be thinking along those lines already.

Catherine Sutton and Leonard Edmondson
943 Madison Street
albany CA

From: Brad Bunnin
To: EBH-EIS-FEMA-RIX
Cc: Park Hills Hills listserve; inquiries@hillsconservationnetwork.org
Subject: Support for the vegetation reduction program
Date: Wednesday, May 22, 2013 4:20:48 PM

My wife and I want to commend you for a thorough, informative, and accurate EIS for the Berkeley/Oakland Hills tree removal program. We are concerned about the existing fuel load and its potential effect on the hills ecosystem. We agree that introduced species, wholly unsuited to our climate, should be removed. We also agree that aging Monterey pines represent a threat to the hill ecosystem. After considerable research, we believe that the safe application of herbicides is possible—and that it represents a much smaller risk to the hills community, both human and natural, than the risk of a major conflagration.

Please know that organizations such as the Hills Conservation Network do not speak for us when they oppose the plan, and that they are spreading false information about FEMA's intentions and methods.

Brad and Nenelle Bunnin

From: mayshinb@aol.com
To: EBH-EIS-FEMA-RIX
Subject: EIS plans to remove/poison trees
Date: Wednesday, May 22, 2013 4:13:34 PM

Please reconsider plans to remove/poison trees in the Berkeley/Oakland hills. The benefits the trees provide (erosion protection, oxygen production, beautification) far outweigh the consequences of maintaining them. The proposed solution of cutting them down is a huge expense (and very temporary fix as once new vegetation grows, the fire danger will again increase) and the use of poison is more damaging to the environment than the trees could ever be. The EIS needs to investigate more environmentally appropriate means of fire prevention in the Berkeley/Oakland hills.
Maylou Bartlett

From: Peter Schorer
To: EBH-EIS-FEMA-RIX
Subject: Reasons why you should change the Draft EIS for UC, Oakland and EBRPD
Date: Wednesday, May 22, 2013 4:12:00 PM

I am one of an ever-growing number of East Bay residents who are outraged at your proposed cutting of tens of thousands of trees in the Berkeley Hills, supposedly to reduce fire danger. Below are some reasons why your EIS must be changed.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

>The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify

any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

Please don't underestimate our determination to prevent the ecological disaaster you are planning.

-- Peter Schorer
2538 Milvia St.
Berkeley, CA 94704
Phone: 510-548-3827

From: Yogesh Angrish
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: Berkeley/Oakland Hills Deforestation
Date: Wednesday, May 22, 2013 3:48:22 PM

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

Sincerely,
Yogesh Angrish
San Francisco

From: Christy Shepard
To: EBH-EIS-FEMA-RIX
Subject: Stop FEMA"s Deforestation of Berkeley/Oakland hills
Date: Wednesday, May 22, 2013 3:44:41 PM

The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.
Stop the Deforestation!

Christy Shepard
Berkeley, CA

From: Bonnie Hughes
To: EBH-EIS-FEMA-RIX
Subject: Berkeley Hills
Date: Wednesday, May 22, 2013 3:37:25 PM

>The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy. At same time it does not consider the importance of the roots of trees to hold the moisture in the soil and avert landslides.

Bonnie Hughes
Berkeley CA

From: Michael Cain on behalf of Michael Peter Cain
To: EBH-EIS-FEMA-RIX
Subject: Please Stop the Berkeley and Oakland Tree Destruction project....
Date: Wednesday, May 22, 2013 3:37:00 PM

Dear Fema:

Public lands belong to the public, and I am a tax paying member of the "public." The money that will be used to implement these projects is my tax dollars, and I do NOT approve of these projects!!!!

These projects are more likely to **increase the risk of wildfires** than to reduce that risk.

By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will **damage the environment** by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will **endanger the public** by dousing our public lands with thousands of gallons of toxic herbicides.

* **Erosion** is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* **Non-native vegetation** such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* **Prescribed burns** will pollute the air and contribute to the risk of wildfire, endangering lives and property and contribute to climate change.

* These projects are an **inappropriate use of the limited resources** of the Federal Emergency Management Agency which are for the expressed

purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

Concerned citizen Charlotte Cain

From: Gene Dussell
To: EBH-EIS-FEMA-RIX
Subject: proposed clear cutting
Date: Wednesday, May 22, 2013 3:31:55 PM

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i have just read the proposal for the clearing of 85,000 trees in the Berkeley and Oakland hills area. This is abominable , is Ecocide , and the fire danger admonition is just another , frighten the public , ruse. If it's not Communism, then it's Terrorism, and when that Fear strategy fails, there will be another. The UCB stranglehold on private and public politics as it benefits the University is always in evidence. Anytime sensible people oppose the manifest destiny of UCB, they are labeled as some fringe class of people, while the majority of "sheep" out there, masquerading as "normal valued" citizens, just quietly complain about rabble rousers; i.e. thinking people with conscience , caring of the environment , and certainly less self-deceiving than the rest of the silent majority.
What isn't a danger? The PR spinners for UCB and FEMA should take time out and spin records, music, rather misleading diatribe. This is nothing more than a stepping stone for other planned building, cementation of the earths soil, another nail in the coffin for Natural Environmental sustainability. FEMA and UCB powers that be, regale in the rationalization of what needs to be, while obfuscating the big picture, the inherent symbiotic relationship people have with all of Nature, and like so many things that don't have short half lives, the continued desecration by destruction continues to add up , it never fades away.
STOP THIS AWFUL AND INCONSIDERATE PLAN!!
G.Dussell

From: Andrea Byers
To: EBH-EIS-FEMA-RIX
Subject: Regarding Plan to cut 100,000 trees in the Berkeley/Oakland Hills
Date: Wednesday, May 22, 2013 3:13:36 PM

As a citizen of Oakland, I have spent a lot of time in the Hills over the past 13 years. I am very concerned about FEMA's fire prevention plan, which involves cutting too many trees and more importantly exposing the area to massive amounts of pesticides. To my understanding this plan would also create a potential fire hazard, if a fire where to ignite.
At a moment in time, when greenhouse gasses have reached 400 ppm in our atmosphere (the highest level recorded), it seems very irresponsible and foolish to follow through with destroying the forest that we have to capture and return our carbon levels back to breathable air. Let's make a balanced choice for ourselves and our children!!!!
--
Andrea Byers, CMT, CST
Craniosacral Therapy for Adults, Children and Babies
Certified Pre- *and* Perinatal Massage Therapy
andreabyers.com
510-710-7665

From: Vicki Thomas
To: EBH-EIS-FEMA-RIX
Subject: The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills
Date: Wednesday, May 22, 2013 3:09:45 PM

I strongly disagree with cutting down 100,000 trees in the Oakland Hills for the following reasons:

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees

This proposal does not consider the economic effect on the area. One of the reasons many of us live in this area is BECAUSE the trees are here and because of the resultant wildlife, natural beauty and micoclimate . If you cut down the trees, you turn beautiful, high tax paying neighborhoods into sweltering expensive slums. You will NOT hold the tax base.

The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

> All around the world desertification is resulting from clear cutting trees. Trees hold the water. What is the proposal to prevent mudslides and desertification of the area?

This is an unacceptable and poorly thought out proposal.

Vicki Thomas
6143 Westover Drive
Oakland CA 94611

From: Lila Skye
To: EBH-EIS-FEMA-RIX
Subject: Oakland Hills deforestation and chemical dump
Date: Wednesday, May 22, 2013 3:06:46 PM

To Whom it may concern,
The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

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Sincerely,

Lila Skye

From: Lisa Lomba
To: EBH-EIS-FEMA-RIX
Subject: FEMA Draft EIS for UC, Oakland, and EBRPD vegetation mgmt projects
Date: Wednesday, May 22, 2013 3:06:23 PM

Comments:

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

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--
Lisa Lomba
510.290.8960
There is a certain embarrassment about being a storyteller in these times when stories are considered not quite as satisfying as statements and statements not quite as satisfying as statistics; but in the long run, a people is known, not by its statements or its statistics, but by the stories it tells.
-Flannery O'Connor, *Mystery and Manners: Occasional Prose*

From: hollyruthr@gmail.com
To: EBH-EIS-FEMA-RIX
Subject: Please do not cut down 10,000 trees!!!
Date: Wednesday, May 22, 2013 2:43:34 PM

Trees are vastly important to the overall health of our planet. They help to mitigate some of the damage being done by our polluting selves, greenhouse gasses.
It has been pointed out that the goal of reducing flame length isn't going to be possible to meet. That infant cutting the trees will increase the danger. That doesn't sound good!? Also what happens when all the trees are poisoned? Is there a truly feasible way of ensuring the hardwoods will not be poisoned also? How will that work? And what about the under brush and poison oak that will grow up in place of the trees? Doesn't that go up in flames very quickly? Listen to the people, find other ways of fire prevention. Ask for volunteers to come up with solutions, this area is full of over educated environmentalists.
Thanks
Holly
Sent from my iPhone

From: Eric Riess
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: vegetation reduction in Berkeley/Oakland Hills
Date: Wednesday, May 22, 2013 2:35:46 PM

To Whom it May Concern,

I support your plan to reduce vegetation in the Berkeley/Oakland Hills. I believe these actions will help prevent serious fires such as those in Oakland in 1991.

Thank you for your efforts,
Eric Riess

From: Rachel Pachivas
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: Please do NOT contaminate our soil and tear down our trees. The EIS is flawed
Date: Wednesday, May 22, 2013 2:35:28 PM

Hello,

The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. It has been proven through numerous studies around the world that these herbicides (including roundup, key ingredient being glyphosate) are toxic and cause a countless number of problems to people, animals in nature and most importantly.. the environment itself!!
We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.
This project is a terrible idea and has sparked an uprising in the communities here in Berkeley and Oakland.

Thank you for taking in my thoughts,

Rachel Pachivas
Berkeley, CA

--

Our lives begin to end the day we become silent about things that matter.
Martin Luther King, Jr.

Please consider the environment before printing this e-mail

From: Kerstin Feist
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: We are against the clearcutting of trees in Oakland/Berkeley Hills
Date: Wednesday, May 22, 2013 2:29:30 PM

To All Who Are Concerned:

I was born and raised in Montclair and my family, neighbors and I love our trees! We are against the clearcutting of trees in Oakland/Berkeley Hills!

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

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Thank you for your consideration,

Kerstin Feist

From: kristinimages@gmail.com on behalf of Christina Hernandez
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: I believe the EIS is flawed
Date: Wednesday, May 22, 2013 2:28:01 PM

I believe that the cutting down close to 100,000 trees is a terribly misguided policy in times where the rest of the world is busy planting and conserving trees.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

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Thank you, Christina Hernandez

This message was sent to Kathy Ottesen by Hills Conservation Network through MoveOn's public petition website. MoveOn.org Civic Action does not endorse specific campaigns or the contents of this message.

To unsubscribe or report this email as inappropriate, click here: http://petitions.moveon.org/unsub.html?i=12441-5189740-U76Li9

--
Christina Hernandez, Nightingale Photography
nightingalephotosblog.com, nightingalephotos.com
Check out my Yelp reviews
Call: + 1 510-338-2997

From: Nicole Newnham
To: EBH-EIS-FEMA-RIX
Subject: Comments about the East Bay deforestation plan
Date: Wednesday, May 22, 2013 2:25:30 PM

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

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Thank you for considering my point of view,

Nicole Newnham

From: Andrew Jones
To: EBH-EIS-FEMA-RIX
Subject: massive tree clearing in East Bay hills is a bad idea
Date: Wednesday, May 22, 2013 2:20:16 PM

Dear FEMA,

I am in full support of responsible fire management in the East Bay hills. No one wants to see a repeat of the devastating fire storm of 1991.

However, please be aware that the forests in these hills provide important recreational, aesthetic, ecological, and climatic values as well.

As I understand it, there are fire management options that do not involve massive tree clearing and widespread application of herbicides. Please endeavor to minimize the need for large tree removal and the application of herbicides as you revise your plan.

Thanks so much,
Andrew Jones
Oakland Resident

From: Anita Carswell
To: EBH-EIS-FEMA-RIX
Subject: FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable
Date: Wednesday, May 22, 2013 2:18:57 PM
Importance: High

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

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>The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

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Anita Carswell
Guardian Campaign Director
In Defense of Animals

"Although a semantic change, the use of the term 'guardian' rather than 'owner,' will encourage a more responsible relationship between pets and those who care for them."

Matt Gonzalez, Former President
San Francisco Board of Supervisors

From: Rita A Kresha
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: Berkeley / Oakland Hills
Date: Wednesday, May 22, 2013 2:18:04 PM

We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem of EBRPD vegetation management projects in the hills. It is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions, and the ongoing reduction in carbon sequestration capacity. The analysis uses an inappropriate baseline, fails to consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract and rework your proposals; consider all the Greenhouse Gas implications of cutting down 100,000 very tall trees.
Rita Kresha @ 72 Glen Eden Ave.,Oakland, CA 94611

From: David Hover
To: EBH-EIS-FEMA-RIX
Subject: Tree cutting
Date: Wednesday, May 22, 2013 2:15:59 PM

The arguments against the proposed tree cutting are too numerous to ignore. The proposed use of FEMA funds to cut down thousands of healthy trees should be axed.

David Hover
San Francisco

From: Megan Delventhal
To: EBH-EIS-FEMA-RIX
Subject: FEMA Draft EIS for UC, Oakland, and EBRPD
Date: Wednesday, May 22, 2013 2:15:11 PM

As a resident of Berkeley, CA, I am deeply concerned about the nature of the FEMA Draft EIS for UC, Oakland and EBRPD vegetation management projects in the hills.

As written, this draft fails to accurately analyze and consider alternate fire risk mitigation options that would be less costly and less environmentally damaging.
Until this Draft reflects deeper analysis and attempt by UC, Oakland and EBRPD to address these options, it should be retracted.

It is unconscionable that this draft is proposed with such a one-sided, quick-solution approach without full consideration of environmental implications.

Thank you for your time.
Sincerely,

Megan C. Delventhal

From: kyra@lmi.net
To: EBH-EIS-FEMA-RIX
Subject: the EIS is flawed!
Date: Wednesday, May 22, 2013 2:08:32 PM

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

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From: Douglas Estes
To: EBH-EIS-FEMA-RIX
Subject: Cutting down of trees will be tragic
Date: Wednesday, May 22, 2013 2:05:45 PM

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Douglas Estes
San Francisco, CA 94118

From: Laurie Halsey Brown
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: Cutting down close to 100,000 trees in Berkeley/Oakland is a terribly misguided policy!
Date: Wednesday, May 22, 2013 2:05:15 PM

Cutting down close to 100,000 trees in Berkeley/Oakland is a terribly misguided policy!

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retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

kind regards,
laurie

Laurie Halsey Brown started senseofplace LAB as an artistic laboratory to develop a shared language of place; using art / architecture / language / design / urban planning concepts to communicate where we 'live': locally and globally. It began in San Francisco in 2010 - based on research/projects since 2000. senseofplace LAB creates projects for both an art context, and in collaboration with - and then placed into - communities.

From: Jeff Baird
To: EBH-EIS-FEMA-RIX
Subject: Our Strong Support for the Draft EIS and Proposed Actions
Date: Tuesday, May 14, 2013 8:01:00 PM

Dear Sir/Madam:

As residents of the East Bay Hills, specifically in the 1991 fire zone, our family strongly endorses the proposed actions of FEMA to reduce the wildfire risks to the people and properties in our neighborhoods, and restore the impacted areas to their native habitat. The proposal is clearly well conceived, well researched, and well prepared. We applaud the work of all parties in this including the land owners and other agencies that worked to create it.

We cannot overstate our level of support for this project and hope to see it move forward with all deliberate speed.

Sincerely and hopefully,

The Baird Family
(Jeff, Millie, Ai-li (8) and Anya (5))

600 Alvarado Road
Oakland, California

From: Kenneth Gibson
To: EBH-EIS-FEMA-RIX
Subject: Vegetation Management in the East Bay Hills
Date: Tuesday, May 14, 2013 5:48:46 PM

FEMA,

Vegetation management should not mean repetitive identification and removal. Over the long term, surely, a more effective model will be vegetative replacement. Much of the hills and valley areas of the East Bay were prehistorically characterized by robust stands of sequoia sempervirens and coast redwood, certainly along the slopes leading down to springs and streams. This growth still predominates in such areas, but needs to be encouraged further up slopes with ne plantings. Such plantings on westward facing crests will also tend to catch the airborne moisture of the foggy coast and bring it to earth, as in the past.

Elevated rolling hills should be protected again with native California oak, which once established will shelter native grasses from drying out so fast while slowing their seasonal growth rate. So long as the oak is not infected it too should reduce the growth of other, far more hazardous grasses, shrubs, vines and trees.

I agree that the staged removal of eucalyptus from inhabited areas, and then farther afield, is paramount.

Sincerely,

Kenneth Gibson
Kearney Avenue Resident
Oakland CA 94602-2607

From: Stephen Lau
To: EBH-EIS-FEMA-RIX
Subject: supporting the EIS
Date: Tuesday, May 14, 2013 5:00:24 PM

Just wanted to add my support for the EIS.

--
stephen lau | steve@grommit.com | http://whacked.net | @stevel

From: Doug Tygar
To: EBH-EIS-FEMA-RIX
Subject: Writing in support of the FEMA/East Bay Hills Hazardous Fire Risk Reduction Proposal
Date: Tuesday, May 14, 2013 4:01:17 PM

Friends:

I am submitting this comment in response to the post Draft EIS for Hazardous Fire Risk Reduction.

I very strongly support this proposal, and believe that the excellent Draft EIS shows that the best environmental impact would be to proceed with the plan. Failing to take action runs the risk of a catastrophic fire that will not only be a natural catastrophe, destroying native animals and plants, but will also likely result in horrendous loss of life and personal property.

I live in the area (on Alvarado Road) and work at UC Berkeley (as a professor). I want to give my unqualified support for this plan.

This is outstanding work, a worthy project, and proceeding with the proposed Hazardous Fire Risk Reduction program will best protect the environment.

Yours,

Doug Tygar

Doug Tygar, Professor of Computer Science & Information, UC Berkeley
web: www.tygar.net; phone: 510-643-7855; fax: 815-301-5497

From: Maggie Harmon
To: EBH-EIS-FEMA-RIX
Subject: Comment in Support of Removal of Non-Native Species
Date: Tuesday, May 14, 2013 2:38:06 PM

I am writing to voice my support of the East Bay regional plan that would remove and reduce the number of hazardous nonnative species in the Oakland Hills. Specifically I am in support of the removal of non-native eucalyptus is it presents a fire hazard to the area residents.

Thank you,
Maggie Harmon
6788 Armour Drive
Oakland CA 94611

Maggie AF Harmon
c (510)688-8595

From: stuart phillips
To: EBH-EIS-FEMA-RIX
Subject: Do NOT cut any trees whatsoever to mitigate fire!
Date: Tuesday, May 14, 2013 2:19:57 PM

Do NOT cut any trees whatsoever to mitigate fire, trees keep soil MOIST, COOLER, PREVENT FLOODING & DROUGHT, PROVIDE HABITAT FOR WILDLIFE, CLEAN THE AIR! DO NOT CUT ANY TREES WHATSOEVER IN THE EAST BAY OR ENTIRE BAY AREA, TREES KEEP TEMPERATURE DOWN, & KEEP WILDFIRE AT BAY BY KEEPING SOIL MOIST, COOLER, HENCE MORE FIRE RESISTANT, THIS IS COMMON SENSE, LEAVE THE TREES ALONE, YOU CUT, YOU CREATE DROUGHT & WILDFIRE, LEAVE THE TREES ALONE! NOW, DON'T CUT ANY OF THEM, THEY PREVENT FIRE ONCE & FOR ALL!
stu lips, oakland, ca

From: Debora Sayre
To: EBH-EIS-FEMA-RIX
Subject: 3 deforestation projects
Date: Tuesday, May 14, 2013 1:59:38 PM

To Whom It May Concern,
I just want to express my opposition to the three deforestation projects. I fail to see how they will prevent forest fires. I believe it would promote erosion issues and I am against the herbicides which would be needed to prevent resprouting of the trees.
Thank you for your time and consideration.
Sincerely,
Debora Sayre, DVM
376 Orange St
Oakland, CA 94610

Sent from my iPhone

From: Hills Conservation Network
To: EBH-EIS-FEMA-RIX
Subject: 489 signers: Stop the deforestation of the Berkeley/Oakland Hills petition
Date: Tuesday, May 14, 2013 10:49:06 AM

Dear FEMA,

I started a petition to you titled *Stop the deforestation of the Berkeley/Oakland Hills*. So far, the petition has 489 total signers.

You can email all petition signers by clicking here:
http://petitions.moveon.org/target_talkback.html?tt=tt-42455-custom-21317-20130528-tqleoG

The petition states:

> "The current Draft EIS is unacceptable as it inflicts enormous environmental damage, will expose the public to thousands of gallons of toxic herbicide, destroys raptor habitat, destabilizes steep slopes, and will actually increase the risk of hazardous wildfires. FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing 50k+ trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem, and cannot be allowed to happen."

To download a PDF file of all your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=855964&target_type=custom&target_id=21317

Thank you.

--Hills Conservation Network

If you have any other questions, please email petitions@moveon.org.

The links to download the petition as a PDF and to respond to all of your constituents will remain available for the next 14 days.

This email was sent through MoveOn's petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=xH6bm7btHgt1XQnAc8fwEiBFQkgtRUlTLUZFTUEtUklYQGZlbWEuZGhzLmdvdg--&petition_id=42455.

From: kenneth eifert
To: EBH-EIS-FEMA-RIX
Subject: removal of non-native vegetation
Date: Tuesday, May 14, 2013 8:05:49 AM

I fully support the removal of non-native vegetation and those nasty Eucalyptus trees. They need to go.

Kenneth Eifert DDS
6900 Sherwick Dr
Berkeley Ca 94705
510-705-1755

From: Bob Roat
To: EBH-EIS-FEMA-RIX
Subject: Subscribe
Date: Tuesday, May 14, 2013 7:17:05 AM

Bob Roat
Board of Directors
Friends of Sausal Creek
3815 Brighton Ave
Oakland, CA 94602
510.919.4358

From: Suo Maria
To: EBH-EIS-FEMA-RIX
Subject: EIS - Support for removal of eucalyptus trees from the East Bay Hills
Date: Monday, May 13, 2013 11:07:02 PM

To Whom It May Concern,
This is to notify you that we strongly support removal of the eucalyptus trees in the East Bay Hills in Alameda and Contra Costa Counties in order to bring back the
native tree species.
Sincerely,
Suo W. Fong
Maria J.Vermiglio

From: Tim Cutting
To: EBH-EIS-FEMA-RIX
Cc: Tim Cutting
Subject: Support for EIS for East Bay Hill
Date: Monday, May 13, 2013 10:02:21 PM

I wholeheartedly support the EIS plan for the removal of non-native Eucalyptus and other non-native trees. I live on Charing Cross and stare across HWY 24 from my deck at the invasive Eucalyptus that covers our hillsides. Right below my residence a fire sparked up a few years back, and 20 years ago this residence was destroyed by the infamous Oakland hills fire. A large catalyst of these fires was non-native trees.

Please return our hillsides to their original native vegetation for the sake of fire danger, and to return our hills to the original beauty that nature intended before non-natives were planted in the early 1900s.

Thank you,

Tim Cutting
6678 Charing Cross Road
Oakland, CA 94618
805.550.8531

-
Tim Cutting - CEO/cofounder
Tel: 805.550.8531
Fax: 925.474.4666

Niveus Media, Inc.
http://www.niveus.com
& on Facebook
& on Twitter

From: William Tullis
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Enviro Impact Study
Date: Monday, May 13, 2013 9:00:09 PM

As a resident of the subject hills, and having reviewed the subject draft EIS, I fully support the recommendations contained within in their entirety in order to significantly reduce the potential for another disastrous wild fire. The non native vegetation, especially the eucs, must be eliminated. Simply said: As residents, our lives depend on it. Thank you.

Best Regards,

Bill Tullis
6826 Sherwick Dr
Berkeley, CA
94705

510 325-0456

From: Samuela
To: EBH-EIS-FEMA-RIX
Subject: FEMA EIS for East Bay Hills Fire Prevention
Date: Monday, May 13, 2013 8:19:27 PM

To whom it may concern:

I live downhill from the area in question and I hike there frequently. Any fire in that area threatens my neighborhood as well as it did in October 1991. I support the reduction of hazardous fire materials, eucalyptus trees etc. and replacing them with native species which are much less fire prone.

This work has already been done on a parcel of land off of Claremont Canyon and shows what a great difference this work can make to this area and to protecting the residents from future fires.

I support this funding request.

Samuela Evans
Berkeley CA

From: Terry Galloway
To: EBH-EIS-FEMA-RIX
Subject: Comments on the EBH EIS
Date: Monday, May 13, 2013 7:45:29 PM

As one who escaped both the 1972 and 1991 fire, it important for our neighborhood to remember our history and the real causes for the fire spreading from Eucs and Monterey Pine embers.

I have lived at the corner os Sherwick and Charing Cross for 45 years. This is where we lost 10 of our neighbors.

Yes, I read the EIS, and as a chemical engineer, agree with the cut stump treatment with Round Up for one method, The re-sprouting of the blue gum oily new leaves have to be stopped, so the fire safe natives can grow back. Also Scotch Broom needs to be removed as well.

---Terry

Dr. Terry Galloway, CTO
6801 Sherwick Dr.
Berkeley, CA 94705
Direct (510) 841-4674

From: Robert M. Meyers
To: EBH-EIS-FEMA-RIX
Subject: Comments
Date: Monday, May 13, 2013 7:37:04 PM

Urge you to use some of the FEMA funds to remove non-native invasive Eucalyptus wherever possible. They create a huge amount of flammable leaf and bark droppings, they prevent anything else from growing under them and have limbs that bend and break in our frequent windstorms here in the Hills. Urge removing them and the duff dropped on the ground and then replanting with natives such as Live Oaks.

Thank You,
Robert M. Meyers
6250 Melville Drive
Oakland, CA 94611
510-530-5590

From: Keith White
To: EBH-EIS-FEMA-RIX
Subject: Fire REduction In Oakland, CA Hills
Date: Monday, May 13, 2013 7:24:50 PM

Dear FEMA,

I am a resident of Claremont Canyon and greatly in favor of the plan of the University of California to remove eucalyptus to reduce the risks of a catastrophic fire.

Than you.

Sincerely yours,

Keith W

Sent from my iPadhite

From: leewaysf
To: EBH-EIS-FEMA-RIX
Subject: Support Approval of Environmental Impact Statement Now to Remove Eucalyptus from Claremont Canyon
Date: Monday, May 13, 2013 6:17:58 PM

---

approve the EIS and release the funds so the University can proceed to cut down the eucs.

Thank you,

Lee Rudin
Daly City, CA 94014

Plant native trees, shrubs, flowers and grasses.

Please consider the environment before printing this email. Thank you.

From: kristen van dam
To: EBH-EIS-FEMA-RIX
Subject: Please approve East Bay Hills Eucalyptus Removal EIS
Date: Monday, May 13, 2013 6:13:20 PM

To whom it may concern,
I write urging you to approve the EIS as-is for removal of Claremont Canyon eucalyptus trees for fire prevention. I live in the Berkeley Hills and have seen the extreme fire danger eucalypts pose to residents here. I wholeheartedly support the removal of any eucalyptus growing in the area that might pose a fire danger.

As the dry season nears after another dry winter, I worry frequently about the extensive eucalyptus cover in the hills around my neighborhood. The fire risk will only grow the hotter and drier the climate becomes. I support any and all efforts to reduce eucalyptus cover.

Sincerely,

Kristen Van Dam
104 Hill Road
Berkeley CA 94708

From: aoniell@pacbell.net
To: EBH-EIS-FEMA-RIX
Subject: Oakland Hills Fire Protection
Date: Monday, May 13, 2013 5:29:10 PM

PLEASE cut the trees!!!!! I can't attend the meetings, but I want my voice heard. Let's please cut the hazardous trees!!!!
Sent from my iPhone

From: Nancy Lane
To: EBH-EIS-FEMA-RIX
Subject: Fwd: [NH OpenForum] ***SPAM*** Support FEMA grant
Date: Monday, May 13, 2013 5:19:44 PM

D ear FEMA,
Please, please, please remove every eucalyptus you possibly can, as quickly as possible. I did not lose my house in the '91 fire, but it was only about 75 yards from the fireline. I am especially affected by the products PDM-PJ-09-CA-2006-004 and HMGP 1731-16-34 but am in favor of removing the eucalyptus and beginning to replace them with alternative growth.

Proceed apace.

thanks,
Nancy Lane
Balsam Way
Oakland CA

* * *
FEMA will host three public meetings this week. At these meetings you can learn more about the proposed projects, review information about the draft EIS, and speak directly with federal, state, and local government representatives. You may also provide oral or written comments at the public meetings. Each of the three meetings will feature the same format and provide the same information. The meetings will be held at the following locations and times:
1. Tuesday, May 14, 2:00 p.m. – 4:00 p.m., Richard C. Trudeau Center, 11500 Skyline Boulevard Oakland, CA 94619 (Take 13 to Joaquin Miller Rd, continuing straight ahead as it becomes Skyline, 1st turn on the left)
2. Tuesday, May 14, 6:00 p.m. – 8:00 p.m., Richard C. Trudeau Center, 11500 Skyline Boulevard Oakland, CA 94619
3. Saturday, May 18, 10:00 a.m. – 12:00 p.m., Claremont Middle School, 5750 College Avenue Oakland, CA 94618

FEMA is welcoming public comments on the draft EIS through June 17th, 2013. You may submit written comments in several ways:
1. Via the project website: http://ebheis.cdmims.com
2. At the public meetings listed above
3. By email: EBH-EIS-FEMA-RIX@fema.dhs.gov
4. By mail: P.O. Box 72379, Oakland, CA 94612-8579
5. By fax: 510-627-7147

From: Ken Benson
To: EBH-EIS-FEMA-RIX
Subject: Comments re Oakland, UC Berkeley, EBMUD FEMA Grant EIS Report
Date: Monday, May 13, 2013 3:30:53 PM

As a founding member of the Oakland Wildfire Prevention Assessment District and a current Co-Chair of the citizens effort to renew the District; I fully support the procedures outlined in the FEMA Grant EIS for fuel reduction in the East Bay Hills. We need a complete and thorough management of fuel loads and specifically managing our aging Monterey Pines and Eucalyptus to aid in reducing the spread of wildfire in our urban wild land fire interface zone. Given the history of wildfire in the East Bay Hills, the terrible 1991 Firestorm, and our annual battle with Diablo winds and dry conditions The City of Oakland, EBRP, and the University needs the full range of hazardous fire fuels management practices to keep us all safe from the spread of fire.

Sincerely,

Ken Benson
Co-Chair
Keep Oakland Firesafe
www.keepoaklandfiresafe.org

From: Susan Spiller
To: EBH-EIS-FEMA-RIX
Subject: strong support to FEMA to approve the EIS and release the funds to the University off California at Berkeley
Date: Monday, May 13, 2013 3:20:47 PM

The Federal Emergency Management Agency (FEMA) has released a draft Environmental Impact Statement (EIS) as a preliminary step before it releases funds to remove invasive and fire-prone eucalyptus trees from the East Bay hills. The EIS is a thoroughly researched document that makes a strong case for removing these trees in order to reduce fire danger and promote growth of native trees and other plants.

I strongly support this removal. Other work to date is Claremont Canyon is a model for what should be done BEFORE the next fire ravages our community.

My Very Best Regards,

-- Susan C. Spiller, Ph.D.
Associate Professor of Biology
Biology Department, Mills College
5000 MacArthur Blvd, Oakland, CA 94613
Tel (510) 430-3175; Fax (510) 430-3304
spillerlab.com

From: Aram Sohigian
To: EBH-EIS-FEMA-RIX
Subject: Do not cut
Date: Friday, May 17, 2013 1:50:23 PM

Please do not cut those magnificent trees in the canyons. There is a way to be fire safe and not sell out to Monsanto and the other companies that are trying to destroy our eco-system. Please reconsider!

To your health,

Aram Sohigian

From: The Guynns
To: EBH-EIS-FEMA-RIX
Subject: Plan to cut down beautiful trees in Berkeley, CA
Date: Friday, May 17, 2013 1:49:19 PM

FEMA,

We are absolutely horrified to learn of your plan to cut down thousand and thousands of beautiful trees in our community. There is no justification for this. This seems to be happening in secret. Please understand we are outraged, and so many others would be too if they knew of your plan.

Please rethink this fatal step. Please let us know that you will not go ahead.

Stefanie and William Guynn
Berkeley, CA

From: caremariew@aol.com
To: EBH-EIS-FEMA-RIX
Subject: Tree removal/pesticides
Date: Friday, May 17, 2013 1:49:06 PM

I grew up in the area of Strawberry Canyon. It was an Idyllic childhood. We had trails to roam in and deer were in our backyard. We were surrounded by the beauty of nature which included innumerable trees, which we climbed and built forts in. We lived on University property across from the pools. I object to the removal of these trees which are a huge part of Berkeley.

I also object to a big use of toxic pesticides which I am personally familiar with congenital deformities that they can cause. I strongly oppose this project.

From: Amy Stice
To: EBH-EIS-FEMA-RIX
Subject: Support of EIS for East Bay Hills
Date: Friday, May 17, 2013 1:40:55 PM

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term improvements to the native landscape should move forward without delay. We Rockridge Terrace residents know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive. Thank you for supporting this important work. Please approve the EIS as soon as possible.

Support of EIS for East Bay Hills,

Amy Hayes
29 Buena Vista Pl.
Oakland

From: Tom Ferguson
To: EBH-EIS-FEMA-RIX
Subject: Berkeley and Oakland clear cutting
Date: Friday, May 17, 2013 1:31:57 PM

PLEASE PLEASE DON"T DO THIS. I'm an Oakland resident who works in Berkeley and I do not want this to happen to our local nature.

-Tom Ferguson

From: Vivas, Alejandro (CDPH-FDLB)
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyon areas,
Date: Friday, May 17, 2013 1:30:57 PM

Dear EIS/FEMA,

In researching and considering the upcoming plan to remove non- native trees from the Strawberry and Claremont areas it became apparent that while efforts to reduce impact of non-native species is a worthwhile and notable consideration in our ecosystem, the reasoning behind removal of such species is myopic and faulted. The amount of dead woodchips left behind will serve as a further fire risk and will create a drier environment even more susceptible to fire. The potential benefits (which do not seem probable given current environmental factors) do not outweigh the destruction of this area that provides a richer atmosphere, wildlife and natural beauty this area is known for. Please take these facts into consideration before doing long lasting damage to a community so deeply cared about.

Thank you,

Alejandro Vivas
Department of Public Health
Division of Food, Drug and Radiation Safety, FDLB
510.412.1606

From: Alexandra Posey
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project
Date: Friday, May 17, 2013 1:29:51 PM

Hello,

My name is Alexandra Posey, and I am a UC Berkeley alumna and current Oakland resident. I have a stake in the safety of both of these communities, and understand the danger posed to them by wildfires. However, I think the proposed plan to decimate the trees that currently exist in the Berkeley and Oakland Hills, including those within the historic Strawberry and Claremont Canyon areas, is a short-sighted solution that negatively affects these communities to a far greater degree than it protects them.

The trees in these areas have stood for decades. They are home to wildlife and are an essential component of the beautiful natural landscape that surrounds Alameda county and draws residents, businesses, students and professors to the area. I personally have chosen to live in Oakland, despite working in San Francisco, in no small part because of the proximity to these beautiful natural landscapes. I hike these areas frequently, and would be devastated to lose the trees that make the hills so beautiful.

While wildfires pose a very legitimate threat to these areas, I believe that attempting to prevent them by essentially clear-cutting large swatches of forest increases the likelihood of a truly devastating fire in the future. Deforestation contributes to global warming, very likely the culprit responsible for the severity of the wildfires in the West in recent years. Numerous studies also conclude that fire prevention in the form of brush clearing and clear-cutting prevents natural, small, and easily contained cyclical wildfires from occurring, which makes the area much more susceptible to a devastating and uncontrollable fire in the future.

Protecting Oakland and Berkeley residents and homes from fires is a worthwhile pursuit. However, I believe the proposed plan to clear-cut 85,000 trees is drastic and ultimately damaging to these communities and the environment. Please pursue alternative and less environmentally-invasive means of preventing fires in the area.

Sincerely,
Alexandra Posey

189 Vernon Terrace, Apt 8
Oakland, CA 94610
alexandra.e.posey@gmail.com

From: Betty
To: EBH-EIS-FEMA-RIX
Subject: Destroying the natural habitat of Berkeley and Oakland wildlife
Date: Friday, May 17, 2013 1:21:48 PM

Clearcutting and poisoning the soil in the Berkeley and Oakland hills is not only completely unnecessary, it's murder for countless animals and plants that are native to the Bay Area. Poisoning the ground with pesticides is even worse. Please stop this horrendous abuse of public funds and public space.

Elizabeth Oram

From: Maya E
To: EBH-EIS-FEMA-RIX
Subject: Unnecessary clearing of trees
Date: Friday, May 17, 2013 1:17:15 PM

To Whom it May Concern,

Please reconsider your plan to clear the trees in Strawberry and Claremont Canyon. These trees help make up a beautiful, native natural oasis in the midst of urban living. The resources needed for a clearing project like this could be better allocated towards something more worthwhile. Additionally, the proposed plan to use herbicides, roundup and other toxic chemicals has no place on land that is hiked, foraged, and enjoyed daily by people, dogs, and numerous other native species.

Thank you,
Maya
Oakland Resident

From: Jack Litewka
To: EBH-EIS-FEMA-RIX
Cc: Jack Litewka
Subject: FEMA plan for Hazardous Fire Risk Reduction
Date: Friday, May 17, 2013 1:16:38 PM

Greetings --

I am writing to you to express my strong opposition to the plan to clear-cut 80,000+ trees in the Berkeley and Oakland hills. To say that the plan is short-sighted is an understatement. The solution is worse than the potential problem: e.g., pouring herbicides into the hills is not great...and despite best intentions, this will not be a one-time pouring (because nature spreads seeds and stubbornly regenerates). And the long-term maintenance costs will be great, as will be the environmental impacts "downstream".

I am a resident of Berkeley, and have for almost 50 years enjoyed the beauty of Strawbery Canyon. It's clear to me that less-lethal and less-extreme approaches could be taken to reduce the risk of fire -- and it might result in summer jobs over the long term, which would almost certainly be less expensive than the proposed plan (which is *not* a one-time fix, though some may have such dreams).

Please withdraw the plans immediately...and save a lot of money by immediately canceling the EIS effort.

Regards, Jack

Jack Litewka -- Consultant
jack@jacklitewka.com

From: Judy Scott
To: EBH-EIS-FEMA-RIX
Subject: Strongly Favorable to Eucalyptus Removal in and around Claremont Canyon
Date: Friday, May 17, 2013 1:15:49 PM

I reside adjacent to the Claremont Canyon. I give full support to the fire reduction plan proposed in the subject Environmental Impact Statement. The removal of this inflammable invasive species will provide not only a fire safe environment but allow for replanting of species.

Judith M Scott
751 Alvarado Road Berkeley 94705
510 219 4170

From: Stern, Lise S.
To: EBH-EIS-FEMA-RIX
Subject: follow up public comment
Date: Friday, May 17, 2013 1:15:34 PM

To Whom It May Concern

This is a follow up to my previous public comment. I strongly oppose the use of my tax dollars to cut down trees on (presumably) "my" public lands. I can understand and support the thinning of some nonnative trees, for fire safety, but this project is too extreme in that it does not take into account soil erosion and hill slides, how these trees function as wind breaks which slow down the winds in other fires, or the impact of baron land on the ecosystem. Not having an affirmative plan for the replanting of California natives is foolhardy in a project of such scope. The more likely scenario is for the invasive non-natives to move in and populate the empty space, requiring the use of ever more herbicide's, at even greater public health risk. When the government is cutting so many much needed programs, why is this being funded when it is so poorly planned. If the government is so worried about fire risk, why not fund the eradication of many acres of parkland of the non-native plants in so many of the park lands. They are overgrown with weeds from neglect, due to lack of funding. Why not start there?

I do not support the clear cutting of these forest canyons. Do not do this.

Lise Stern, MFT
Mental Health Clinician
Solano County Mental Health
FACT Program
707-784-2099
Fax: 707-427-2981

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From: Gabriela Frank
To: EBH-EIS-FEMA-RIX
Subject: In opposition to FEMA"s plan to destroy Berkeley/Oakland trees
Date: Friday, May 17, 2013 1:13:50 PM

To Whom it May Concern:

I am writing to express my dismay at FEMA's plan to remove 85,000 trees from Berkeley and Oakland in the state of California. Many of these trees are decades old, and the plan to demolish our natural environment and cover the ground in poison to prevent plants from growing in the cleared areas is horrific. Please do not proceed with this awful plan.

Sincerely,
Dr. Gabriela Lena Frank
Native of Berkeley, current resident of Oakland

From: Sharon Heath
To: EBH-EIS-FEMA-RIX
Subject: Regarding FEMA Plans to Clear-Cut 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 1:12:40 PM

The trees in Strawberry and Claremont Canyon have been there for decades and hardly constitute a "hazard." But pouring 1400 gallons of herbicide on the currently pristine hills will create a real hazard, and UC Berkeley even plans to use the highly toxic herbicide "Roundup" to squelch the return of non-native vegetation.

As a resident of this state, I demand you rescind your plan to clear cut these venerable trees for the following reasons:

* These projects are more likely to increase the risk of wildfires than to reduce that risk.
  By distributing tons of dead wood onto bare ground

  By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

  By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

  By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will damage the environment by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will endanger the public by dousing our public lands with thousands of gallons of toxic herbicides.

* Erosion is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* Non-native vegetation such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* Prescribed burns will pollute the air and contribute to the

risk of wildfire, endangering lives and property.

* These projects are an inappropriate use of the limited resources of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

Sincerely,

Sharon Heath

From: Heather Fadden
To: EBH-EIS-FEMA-RIX
Subject: There is no sense in taking trees away from the east bay hills
Date: Friday, May 17, 2013 1:12:32 PM

Unforgivable unnecessary and evil plans like that are not helping anyone breathe.

Sent from my iPhone

From: David Hall
To: EBH-EIS-FEMA-RIX
Cc: David Hall
Subject: NO earthly reason to clear cut 60,000 trees
Date: Friday, May 17, 2013 1:12:16 PM

Please, let NATURE take its own course.

Don't WASTE air cleansing trees in the name of fire prevention.
This is an absurd notion.

You justify destroying nature at the hands of humans before, at some future unknown time, nature destroys itself?
That's what some group of decision makers came up with?? That's the best use of time and money??

Have government officials lost their minds??
No matter what the studies indicate, no matter what surveys, experts, and others choose to prove as a case,
there can be NO GOOD REASON to cut down trees and replace with RoundUp saturated mulch.

This is not progress. This is a FEMA mass poisoning of our lands, close to home, and just a terrible use of financial resource for an outcome that can only hurt these sacred lands, not benefit.

Please STOP the madness, come to your senses and find other ways to waste tax-payer monies...

Sincerely,

former Berkeleyite

David H. Hall

From: Heather Fadden
To: EBH-EIS-FEMA-RIX
Subject: Berkeley hills" trees
Date: Friday, May 17, 2013 1:11:13 PM

Berkeley and Oakland appreciate those trees please don't destroy them. Property value would plummet and without the trees those hills will become a slum especially if herbicide roundup poisons the landscape. I used to tell my kids uc Berkeley was a good school but if all those 85,000 trees are senselessly destroyed I will avoid that place like it is a blight on society.

Sent from my iPhone

From: soulpiercing@gmail.com on behalf of Stephen Thompson
To: EBH-EIS-FEMA-RIX
Subject: Berkeley/Oakland Trees
Date: Friday, May 17, 2013 1:09:18 PM

Hello,

I was shocked to find out there was a plan to cut down so many trees in the Berkeley/Oakland hills and even more shocked that a community in this area would allow the wholesale use of herbicides like Roundup. This sounds like very poor planning, even if there is any validity to the risk of fires.

As a resident of Berkeley, I am adamantly against any measures, including this one, that put our green spaces at risk. I spend many weekends with my stepson hiking in and around Claremont canyon. The last thing we need in an already polluted environment is for herbicides to wash down into our neighborhoods. These precious areas need to be preserved, not clear cut!

thank you,
Stephen Thompson

From: Kerry Heffernan
To: EBH-EIS-FEMA-RIX
Subject: Removal of 85,000 trees in Oakland and Berkeley
Date: Friday, May 17, 2013 1:07:40 PM

To Whom it may concern;
I lived through the Oakland Firestorm in 1991 and I remember well what it was like so I do support the removal of some of the trees for safety purposes but I think your analysts have gone too far. 85,000 trees is just crazy! I do not support the deployment of foliage suppressants like “Round Up” either. Those chemicals are horribly destructive. I am a voter and a citizen of the US.

Please reconsider the really very DIRE proposal you have submitted and create a different way of dealing with this very real issue. You don’t have to be so extreme.

Thank you,

Kerry L Heffernan

From: Michael Aaberg
To: EBH-EIS-FEMA-RIX
Subject: Clear cutting Oakland and Berkeley
Date: Friday, May 17, 2013 1:03:57 PM

Hello,
As a life time resident of Oakland and Berkeley I would implore you not to clear cut these trees!!

Michael Aaberg
Tigers Milk Music
Oakland CA.

From: Proper Pseudonym
To: EBH-EIS-FEMA-RIX
Subject: RE: Berkeley Clearcut
Date: Friday, May 17, 2013 1:01:40 PM

Hi there,

I am a resident of Berkeley California, and I just wanted to give some feedback real quickly on the subject of the the planned tree removal in the strawberry and claremont canyon on the grounds that the present trees represent a potent fire hazard.

No.

I do not support this. Please intervente. I do not want thousands of gallons of pesticides (roundup) being sprayed anywhere near my home, nor do I want to loose the beautiful hiking trails and tree studded scenery in the area.

Again, I request an intervention. This should not go on. I will attach both the article which referred me, and your own website.

Thank you kindly for the consideration. I feel extremely strongly about this.

~David Alden – long term Berkeley resident

http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees

http://ebheis.cdmims.com/Home.aspx

From: Nina Sawant
To: EBH-EIS-FEMA-RIX
Subject: Berkeley/Oakland tree clearing
Date: Friday, May 17, 2013 1:01:28 PM

Please do not clear these beautiful trees! There must be less destructive ways to deal with a fire hazard than simple, barbaric destruction.

Oakland resident,
Nina sawant

From: Stern, Lise S.
To: EBH-EIS-FEMA-RIX
Subject: Public Comment re: FEMA tree cutting/Berkeley/Oakland
Date: Friday, May 17, 2013 1:00:56 PM

To Whom It May Concern:

I am writing as a public citizen of the East Bay that I am strongly opposed to the clear cutting of thousands of trees in the Berkeley and Oakland Hills, including Stawberry and Clarmont Canyons; as well as the use of pesticides to control the spread of non-native plants. These canyons provide much needed green space for the urban areas around them and are much loved by the community. They are no more a fire hazard than all of the rest of our beloved park land. Given the trend towards climate change we should be planting more trees, not cutting thousands down. And we do not need to add to the environmental toxins already surrounding us with thousands of gallons of herbicide (Round up). This is a public health risk.

I oppose this project in the strongest terms. Do not do this.

Lise Stern, MFT
Mental Health Clinician
Solano County Mental Health

Home) 1502 Laurel Avenue
Richmond, CA 94805

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From: Jillian Saxty
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills clearcut
Date: Friday, May 17, 2013 1:00:29 PM

Dear FEMA and UC Berkeley,

As an Alameda County resident, I am totally opposed to your plan to clear-cut Strawberry and Claremont Canyons and then to dump a highly toxic herbicide on the land which will poison the earth and local streams.

This plan is outrageous and unnecessary! There must be much less destructive means to create a fire break or similar than cutting down decades of native plants, which are becoming scarcer and scarcer in the Bay Area.

Please revise your plan immediately or call it off completely.

Thank you
Jillian Saxty
jillian@firstflight.com
Alameda, CA 94501

From: Eli Delventhal
To: EBH-EIS-FEMA-RIX
Subject: Berkeley Trees
Date: Friday, May 17, 2013 12:58:04 PM

I am a 5-year Berkeley resident, and I want to say up front that I am extremely frustrated with how often UC Berkeley skirts or outright violates local laws simply because it's a state institution. Back in 2008, for example, the University destroyed an oak grove and shell mound that were sacred to the native people, in direct violation of the city of Berkeley's laws. This is saddening that I can live in one of the most forward-thinking cities in the country, and yet our biggest landmark community is able to be so backwards thinking without any consequences.

Seeing as the upcoming proposed destruction of Claremont Canyon is something we *can* actually resist as Berkeley residents, I say that it is all the more important that we do so. It needs to be clear to the University how poor their decisions can be on these matters.

Thanks for your time,
Eli

From: Susan Silber
To: EBH-EIS-FEMA-RIX
Subject: Public comment for tree cutting
Date: Friday, May 17, 2013 12:56:17 PM

Please do not cut down trees using herbicides! What is going on here??!!

--
Susan Silber, Consultant

Project Coordinator, Green Star Schools Program
Green Schools Initiative

From: Jess Strange
To: EBH-EIS-FEMA-RIX
Subject: KEEP OUR TREES
Date: Friday, May 17, 2013 12:53:10 PM

---

i am opposed to the plan to get rid of our trees in strawberry and claremont canyon. please do not spend our tax money on this.

From: Ian Wulfson
To: EBH-EIS-FEMA-RIX
Subject: Fire suppression
Date: Friday, May 17, 2013 12:52:51 PM

I am opposed to the use of herbicides to reduce fuel load. I am for the use labor, goats, controlled burns, and other non-toxic methods to manage non-native vegetation.

Thank you,
Ian Wulfson
Oakland resident

From: Negar
To: EBH-EIS-FEMA-RIX
Subject: Against the plan to clear cut in Berkeley
Date: Friday, May 17, 2013 12:49:34 PM

Dear FEMA,

Yes, forest fires happen. Are we supposed to clear cut all the forests with homes nearby and salt the earth with herbicide? This is ridiculous. And a "wildlife movement corridor" is supposed to fix everything? You're removing animals from their homes, decreasing their habitat, forcing them into a new place, and will inevitably kill some in your clear cutting efforts. You're decimating animals and vegetation long-term for a short-sighted goal. Stop.

Negar

From: Hank Lamb
To: EBH-EIS-FEMA-RIX
Subject: U C Berkeley"s Tree Cutting plan
Date: Friday, May 17, 2013 12:48:07 PM

This is among the stupidist thing I've ever heard. I'm more than certain they have a completely alterior motive, probably a building program.

Even more stupid, is FEMA's involvement. Their real job is disaster preparedness and response. It doesn't include forestry or logging or damaging the environment, which this program clearly does.

Doing a large university's program at national public expense for a plan that destroys habitat amd important ground cover that prevents mudslides amd erosion in two large canyons is purely stupid and a trememdous misuse of taxpayer dollars.

Those trees have been there for decades and serve a tremendous need as well as providing a beautiful setting for students and locals.

The fact that so many have survived those decades without burning down the campus, demonstrates the opposite of a need to cut.

This is the sort of thing that's wrong with our nation and abusive of taxpayers and our environment. Please, cut it out.

Insisting,

Henry Lamb
936-239-0040

From: KIM ROCHOW
To: EBH-EIS-FEMA-RIX
Subject: UC Berkeley
Date: Friday, May 17, 2013 12:47:39 PM

Dear FEMA,
I am writing to strongly urge that you deny UC Berkeley's proposed clear-cutting of Strawberry and Claremont Canyons, which provide important habitat for wildlife and increasingly rare wild natural space for humans to enjoy.
I also strongly apposed to the the use of Roundup, a chemical that can and WILL cause complete mortality of tadpoles at ecologically relevant concentrations.
PLEASE SUPPORT THIS REQUEST,
Kindly,
Kim K. Rochow, MA

From: Divya Kotwani
To: EBH-EIS-FEMA-RIX
Subject: Please don"t destroy the Berkeley-Oakland Hills
Date: Friday, May 17, 2013 12:44:46 PM

Hello

My name is Divya Kotwani, and I'm a resident of the Bay area since 5 years.

I strongly oppose the destruction of nearly half a million trees! We need them!

Thank you.

From: Bobbi Arduini
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Fire Reduction
Date: Friday, May 17, 2013 12:34:27 PM

To Whom It May Concern,

As a resident of Alameda County, teacher, and hiker, I strongly oppose the destruction of trees in Strawberry and Claremont Canyon and in the Oakland hills. These areas provide a critical resource for residents of Alameda County, both in terms of the environment and for recreation. Using hazardous chemicals to prevent further growth is not in the best health interests of the community. I do not support this action of FEMA or UC Berkeley.

Sincerely,

Bobbi Arduini

Sent from my iPhone

From: Storm Ainsely
To: EBH-EIS-FEMA-RIX
Subject: PLEASE do not clearcut trees in Berkeley and Oakland
Date: Friday, May 17, 2013 12:33:32 PM

To whom it may concern:

I am writing to STRONGLY oppose the clear cutting of trees in the Berkeley and Oakland area. Trees are essential to the quality of air, and to removing carbon dioxide from the atmosphere. To cut them down would damage the ecosystem and air quality in the area. Furthermore, to cover the area with wood chips and pesticides would cause a significant hazard to all people and wildlife in the area, would spread to the local water systems, and potentially have damaging impacts much farther away from the area. There are much better steps to take if you are concerned about fire prevention. Causing a further rise in global temperature by cutting down trees and increasing carbon dioxide in the air will only lead to more fire possibilities. DO NOT DO THIS. It goes against all sense.

Sincerely,

M Lesinski

From: Shane Sischo
To: EBH-EIS-FEMA-RIX
Subject: Canyon clearing
Date: Friday, May 17, 2013 12:28:12 PM

Hello. I am citizen of Oakland and the Bay Area. As it stands it has come to my attention that you may soon commit a travesty upon the hills and in strawberry canyon as well as clairemont. This can go unheard. What you plan to do is introduce a large amount of toxic chemical into a pristine environment . Why? Why would this be a good idea.?

Please contact me back as I would like to know more about this situation. This is my community as much as its yours.

Shane Sischo
510-435-7086

Nothing lasts, but nothing is lost.
Blake

From: Sean McCormick
To: EBH-EIS-FEMA-RIX
Subject: Use of herbicides in public lands in Oakland
Date: Friday, May 17, 2013 12:22:50 PM

While I believe that the fuel reduction program aimed at eradicating non-native species in the Oakland hills, I strongly object to the spraying of any herbicides in the Oakland hills as part of this fire reduction, especially Roundup. Please find a way to do this without dumping herbicides all over our parks.

-S

Sean McCormick
Director of Engineering, Measurement & Insights
Quantcast

From: Jill Valentine
To: EBH-EIS-FEMA-RIX
Subject: Fire reduction plan Berkeley, and Oakland Trees
Date: Friday, May 17, 2013 12:18:32 PM

I am writing with great concern for the fire reduction plan that is scheduled to take place in Berkeley and Oakland, CA. This area that is planned to be clear cut, is a beautiful sanctuary for us, and a habitat for many animals. We need places like this to be healthy both physically and mentally. The logic of removing all potential hazards is impossible. We live in a insecure world, and are always subject to natural disasters. By removing this forest, and spraying pesticides we are compromising the health of our water systems and the local ecosystem, a system we all depend on. We can't continue to take these wild places for granted. This area is part of what makes this area as charming and desirable as it is. We the public DO NOT support your actions and ask you exercise more creativity when trying to solve problems. Forests like this are priceless and invaluable to our community. Please reconsider.
Sincerely, Jill Valentine
Oakland, CA

From: moonshadow
To: EBH-EIS-FEMA-RIX
Subject: Destruction of trees unnecessily
Date: Friday, May 17, 2013 12:16:26 PM

To whom it may concern:

I am writing to urge you to stop your plan to destroy 85,000 Berkeley and Oakland trees in the Strawberry and Claremont canyon. The destruction of these beautiful trees is not necessary and would diminish the beauty of this area. When I lived in California, I often visited the San Francisco area and enjoyed the beauty of this natural area. Please allow these trees to continue to flourish and allow people who visit here to enjoy the serenity of this majestic natural treasure. You are supposed to protect our environment, not wantonly destroy it.

Diane Alpern
DAlpern702@aol.com

From: Steven Zegas
To: EBH-EIS-FEMA-RIX
Subject: OPPOSITION to Clear-Cut Plan in Berkeley
Date: Friday, May 17, 2013 12:15:40 PM

As a resident in the Oakland / East Area for 25 years, I firmly oppose the plans to clear trees in the East Bay Hills. These areas are a vital natural resource and part of the resounding beauty of the Bay Area.

A clear-cut plan is an ABOMINATION.

Please DO NOT cut down 85,000 beautiful Berkeley and Oakland trees, including 22,000 in historic Strawberry and Claremont Canyon.

How on EARTH can anyone come up with a CRAZY idea like this?

We need vegetation for the environment - air quality and human appreciation**. We DO NOT need acres of wood chips and thousands of gallons of toxic RoundUp poured into our ground.**

OPPOSE and Stop this PLAN!!

Steven Zegas
Encinal Ave
Alameda CA
94501

From: Adam Frey
To: EBH-EIS-FEMA-RIX
Subject: OPPOSITION
Date: Friday, May 17, 2013 12:13:48 PM

I am a UC Berkeley employee and local resident. I am completely opposed to the plan of clearcutting trees in Claremont and Strawberry Canyon.

From: Daniel Atlas
To: EBH-EIS-FEMA-RIX
Subject: Do not cut 85,000 trees
Date: Friday, May 17, 2013 12:11:30 PM

Hi. I am a resident of Bloomington, IN and im writing demanding that the Strawberry and Claremont Canyon and East Bay trees not be clearcut. They are decades old and have not posed as a fire threat before and will have a devastating impact to the environment if logged, especially if RoundUp is poured on the land. There are unimaginable damages that will be irreversible . Please do not log these trees.

Thanks

Daniel Atlas
1215 N Maple St
Bloomington, IN 47404
812-219-5761

From: jeremy@missioncommunitymarket.org on behalf of Jeremy Shaw
To: EBH-EIS-FEMA-RIX
Subject: Please stop the deforestation of the Berkeley/Oakland Hills
Date: Friday, May 17, 2013 12:10:41 PM

Hi,

Please do not clearcut ALL of the tall trees in the hills. Consider proposed "species neutral" fire mitigation strategies that would be cheaper, use far fewer herbicides, and would be far more effective in lessening fire risk.

This is not about a strict originalist view of native species in an urban/suburban environment who's historically naturally state will never be 100% restored. The health of humans, health of soil, erosion and monetary costs also should be considered.

Save money, soil and chemicals. Don't deforest.

Thanks!

Jeremy

From: Aaron Cutchin
To: EBH-EIS-FEMA-RIX
Subject: STOP the horrific plan to clear-cut East Bay trees
Date: Friday, May 17, 2013 12:09:03 PM

The dense foliation of the East Bay is one of the most cherished and sacred characteristics of the area. Any plan to significantly deforest it is an insult to our heritage and our culture.

SHAME on any agency that proposes such a narrow-minded and destructive plan for managing fire risk. There must be solutions that do not involve such radical deforestation.

We, the people of the Bay Area, will NOT allow this to happen!

-- Aaron Cutchin
-- aaroncutchin@yahoo.com

From: Justine Burt
To: EBH-EIS-FEMA-RIX
Subject: PLease don"t cut down the trees in Berkeley and Oakland
Date: Friday, May 17, 2013 12:03:25 PM

We need more trees to fight climate change not fewer. Please don't cut down those trees.

Justine Burt

From: Stephanie Bruce
To: EBH-EIS-FEMA-RIX
Subject: tree cutting in Berkeley and Oakland
Date: Friday, May 17, 2013 11:57:52 AM

To whom it may concern

As a resident of Berkeley for more than 20 years, I find the plan to remove the trees from Strawberry and Claremont Canyons to be a criminal act against the people and landscape and future of this area. It's hard to imagine that human beings in a position of power can make decisions like this that are so completely anti-life. Do you not have grandchildren? Please reconsider this drastic, foolish. plan to cover the ground with wood chips and chemicals in place of the beautiful gift from the Earth that is the trees, and other foliage in these canyons.

Sincerely,
Stephanie Bruce

From: VICKI RANDLE
To: EBH-EIS-FEMA-RIX
Subject: Cutting 22,000 trees in Strawberry and Claremont Canyons and over 60,000 more in Oakland
Date: Friday, May 17, 2013 11:56:11 AM

This is a complete outrage! I spend and have spent countless hours in those canyons and am astonished that anyone thinks the answer to fire danger in these canyons is to clear cut these trees then put down a known toxic chemical to prevent regrowth.
This is completely unacceptable.
Please reconsider this terrible idea and work with the community for other less destructive and toxic options to fire abatement.

Sincerely Vicki Randle

Sent from my iPad

From: Ryan Bettilyon
To: EBH-EIS-FEMA-RIX
Subject: Outrageous East Bay FEMA Proposal
Date: Friday, May 17, 2013 11:54:48 AM

I'd like to make a public comment regarding FEMA's proposal to cut down thousands of Berkeley and Oakland area trees in the name of fire protection. After reading through the details of the proposal (http://milliontrees.me/2013/05/09/nearly-a-half-million-trees-will-be-destroyed-if-these-east-bay-projects-are-approved-revised/) I find it ludicris that turning living trees into woodchips will somehow prevent fire. This is absurd.

Cutting down these trees will reduce shade, increasing moisture evaporation, increasing fire risk.
Cutting down these trees will reduce fog drip condensation which puts more moisture into the soil and surrounding areas, further increasing fire risk.
Cutting down these trees and turning them into woodchips provides a dry mass of combustible material on site - extremely dangerous conditions and a fire hazard in and of itself.
Using herbicide to prevent the resprouting of these trees is an abhorrent use of dangerous chemicals in natural areas near huge population centers.

As a Berkeley resident I am adamantly against this proposal. It is outrageous, unconscionable and will likely achieve the exact opposite of it's stated goals by increasing the risk of fires while robbing the community of these precious trees - a natural resource that can't be easily replaced.

Ryan Bettilyon
1540 Heast Ave. APT 4
Berkeley, CA 94703

From: VICKI RANDLE
To: EBH-EIS-FEMA-RIX
Subject: Subscribe
Date: Friday, May 17, 2013 11:51:07 AM

Sent from my iPad

From: VICKI RANDLE
To: EBH-EIS-FEMA-RIX
Subject: Join mailing list
Date: Friday, May 17, 2013 11:50:12 AM

Sent from my iPad

From: Martin Rapalski
To: EBH-EIS-FEMA-RIX
Subject: Berkeley/Oakland tree removal
Date: Friday, May 17, 2013 11:47:08 AM

This is an outrage! I oppose the removal of trees and the dumping of roundup on the hills of the canyon.

Sincerely,

Martin Rapalski

Sent from my iPhone

From: Katherine Monahan
To: EBH-EIS-FEMA-RIX
Subject: FEMA "fire hazard reduction" NO!!!!
Date: Friday, May 17, 2013 11:45:15 AM

Hello,

As a trained wildlands firefighter, I am familiar with the management techniques of wildland fires. Clear-cutting is not one of them. I could potentially support implementing a permanent firebreak of the standard size: about the width of a road. Cutting more than that is unnecessarily destructive, and destroys natural heritage which belongs to our children. Applying herbicide is likewise completely unrelated to standard, approved wildlands fire management, and presents unknown environmental dangers. I recommend consulting the county fire department for their recommendations, which based on my experience, will likely consist of bringing out a CCC or convict crew to cut a firebreak seasonally.

My family and I STRONGLY OPPOSE the current plan.

Katherine Monahan
Berkeley resident

From: Philipp Grundtner
To: EBH-EIS-FEMA-RIX
Subject: clear-cutting of Strawberry and Claremont Canyons
Date: Friday, May 17, 2013 11:39:30 AM

Dear FEMA, I am writing to strongly urge that you deny UC Berkeley's proposed clear-cutting of Strawberry and Claremont Canyons, which provide important habitat for wildlife and increasingly rare wild natural space for humans to enjoy. I also strongly advise against allowing the use of Roundup, a chemical that can cause complete mortality of tadpoles at ecologically relevant concentrations.

From: Ben Blumgart
To: EBH-EIS-FEMA-RIX
Subject: IN OPPOSITION TO East Bay Hills hazardous fire risk reduction project
Date: Friday, May 17, 2013 11:39:14 AM

To whom it may concern:

I am writing to express my absolute opposition to the proposed project for clear-cutting trees in the Claremont and Strawberry canyons and surrounding areas, and of altering the landscape with groundcover and the application of herbicides. This would be a horrible travesty and needlessly destructive of an area that has stood in the same condition for generations.

I grew up in the area, and for myself and countless others the beauty and peacefulness afforded by these relatively untouched cul-de-sacs is what first taught us respect and appreciation for the East Bay's wonderful wooded hills. DO NOT DO THIS. YOU WOULD BE STEALING FROM HUMANITY AND FROM THE PLANET.

Sincerely,
Ben

Ben Blumgart
Sales Manager
Rentals & Czech-Ease
David Gage String Instruments
(212) 274-1322 ext 233
benblumgart@davidgage.com

From: Max Winter
To: EBH-EIS-FEMA-RIX
Subject: FEMA"s initiative
Date: Friday, May 17, 2013 11:31:04 AM

I think it's absolutely disturbing and saddening that this plan is even being considered! The Strawberry Canyon area and Berkeley/Oakland hills are absolutely beautiful and one of the reasons that the Bay Area is one of the most beautiful areas of California. I urge you not to cut down these beautiful trees and especially not to spray herbicides like Roundup to ensure that plants do not re-grow-- you risk contaminating the drinking water and put people's health at risk. Lastly, California and especially the Bay Area is one of the most environmentally conscious areas in the U.S. and I think its disgusting that this idea is even being proposed. The majority of people who live in the Bay Area would rather have the beautiful scenery of these hills than see you clear over 20,000 acres.

-Max Winter

From: laurel@loloro.com
To: EBH-EIS-FEMA-RIX
Subject: (EIS) on proposed hazardous fire risk reduction activities in the East Bay Hills
Date: Friday, May 17, 2013 11:27:00 AM

To Whom It May Concern,

After reading about the proposed plan for tree removal and fire barrier in the East Bay, I'd like to suggest that a stronger focus be given to protection and restoration of native trees and shrubs as part of the project. While pyrophytic non-natives are removed to reduce fire hazard, locally native trees can be replanted to promote habitat, lessen the disturbance of the natural area, and appease the concerns of the many people who currently enjoy the space.

Sincerely,

Laurel Roth

From: Win Mixter
To: EBH-EIS-FEMA-RIX
Subject: Clear-cutting plan in Berkeley/ Oakland hills
Date: Friday, May 17, 2013 11:21:54 AM

Hi there-
I am writing to let you know that I am deeply disturbed by the plan to remove and redistribute the non-native trees that currently grow across the hills of the East Bay.

While I understand the desire to mitigate fire damage, I fear that by spreading dead wood across barren ground and by spreading dangerous pesticides across our land we will be doing far more harm than good. I, along with all of my colleagues, friends, and what I imagine to be most of the other residents of Alameda county, am strongly opposed to your plan.

I urge your organization to reconsider this plan and find other ways to encourage mitigation of fire damage.
Thank you,
Win Mixter

--
Win R. C. Mixter
winmixter@gmail.com
www.winmixter.com

From: Kerry Kriger
To: EBH-EIS-FEMA-RIX
Cc: Gilbert Adum; Annie Organ
Subject: Do not allow Strawberry and Claremont Canyon proposed clear cutting
Date: Friday, May 17, 2013 10:58:43 AM

Dear FEMA,
As a professional biologist with 15+ years experience in wildlife conservation, I am writing to strongly urge that you deny UC Berkeley's proposed clear-cutting of Strawberry and Claremont Canyon, which provide important habitat for wildlife and increasingly rare wild natural space for humans to enjoy. I also strongly advise against allowing the use of Roundup, a chemical that can cause complete mortality of tadpoles at ecologically relevant concentrations.

Thank you and lease confirm receipt of this message.
Dr. Kerry Kriger
Save The Frogs - Founder, Executive Director, Ecologist
www.savethefrogs.com
www.savethefrogs.com/kerry-kriger
kerry@savethefrogs.com
831-621-6215 (Office)
Santa Cruz, CA 95060

Save The Frogs is the world's leading amphibian conservation organization. We work in California, across the USA, and around the world to prevent the extinction of amphibians, and to create a better planet for humans and wildlife.

The International Day of Pesticide Action is October 12th, 2013:
http://savethefrogs.com/action

The 6th Annual Save The Frogs Day is April 26th, 2014:
http://savethefrogs.com/day

On Fri, May 17, 2013 at 10:21 AM, Annie Organ <annieorgan@att.net> wrote:
> Hi, Kerry and Gilbert:
>
> I thought you would find this article important. It's about a sneaky, likely
> and imminent major tree-cutting pending up in the UC hills, which will
> involve the use of massive amounts of Round-up along the creek. (Score: FEMA
> 22K - frogs 0)
>
> http://www.beyondchron.org/news/index.php?itemid=11361
>
>
>
> Thank you,
>
> Annie Organ
>
>
>
> _____
> From: Kerry Kriger <kerry@savethefrogs.com>
> To: Michael G. Starkey <starkey@savethefrogs.com>; Gilbert Adum
> <gilbert@savethefrogs.com>

> Sent: Sat, April 27, 2013 6:15:55 AM
> Subject: Thank you on behalf of Save The Frogs Ghana
>
> Hi and happy Save The Frogs Day,
> Thanks to your support and that of 51 other donors, we have raised
> $2,600 for Ghana's Save The Frogs Day events since I sent yesterday's
> email!
> The events will go as planned! We expect to raise a significant amount
> of awareness for the togo Slippery Frog and the Atewa Hills National
> Park we are working hard to create. I have added your name to the
> thank you list at www.savethefrogs.com/ghana#thanks
> Have a wonderful Save The Frogs Day!
> www.savethefrogs.com/ghana
> www.savethefrogs.com.day/2013
> Kerry
>
> **********
> Dr. Kerry Kriger
> Save The Frogs - Founder, Executive Director, Ecologist
> www.savethefrogs.com
> www.savethefrogs.com/kerry-kriger
>
> 303 Potrero Street #51
> Santa Cruz, CA 95060 USA
> kerry@savethefrogs.com
> 831-621-6215 (Office)
>
> Save The Frogs is the world's leading amphibian conservation
> organization. We work in California, across the USA, and around the
> world to prevent the extinction of amphibians, and to create a better
> planet for humans and wildlife.
>
> The 5th Annual Save The Frogs Day is April 27th, 2013 -- Get involved!
> http://savethefrogs.com/day

From: kissadayo@gmail.com on behalf of Caitlin S. Cotter
To: EBH-EIS-FEMA-RIX
Subject: tree clear cutting
Date: Friday, May 17, 2013 10:52:13 AM

To whom it may concern,

I was recently appalled to hear of a plan to clear cut trees in the Strawberry and Claremont Canyon area. As a Berkeley Resident I am deeply opposed to this plan, both as someone who appreciates the natural beauty of the area and as someone who understands the ecological affects of this decision. I urge you to leave the trees where they are, and to avoid the use of toxic herbicides. This action under consideration is neither wise, prudent, appropriate, or considerate of the citizens of Berkeley.

Thank you.

Yours sincerely,
Caitlin S. Cotter

From: Nicholas.B.Hirsch@williams.edu
To: EBH-EIS-FEMA-RIX
Subject: Please Don"t Do This
Date: Friday, May 17, 2013 10:45:44 AM

I have lived in the Easy Bay my whole life. The trees and wildlife in the oakland hills is what makes it such a special place. You guys are effectively ruining it for generations to come. Please please please reconsider
-Brady Hirsch

From: Mara Hickey
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Fire risk reduction plan comments
Date: Friday, May 17, 2013 10:45:02 AM

I was living in the East Bay during the huge fires of 1989 or 1990 (I can't remember exactly when they were). They were devastating.

The community has recovered, both by rebuilding and healing, and also by enacting stricter regulations about keeping growth away from homes, building new firestations in the hills, and understanding that fire is a part of nature.

By cutting down trees to prevent fire, we are taking an essential part of the ecosystem out of the environment. Fire is part of nature. Plants depend on it for their long term survival. It's not inherently bad.

By applying herbicide to the environment we are poisoning our ecosystem in ways that cannot be corrected and have no benefit.

I AM STRONGLY OPPOSED TO THE FELLING OF TREES AND APPLICATION OF HERBICIDE IN THE EAST BAY HILLS.

Thank you for considering my letter of opposition. Know that there are hundreds of people who oppose this for each letter that you receive.

Mara Hickey
East Bay resident since 1978.

From: Sean McBride
To: EBH-EIS-FEMA-RIX
Subject: Removal of thousands of trees.
Date: Friday, May 17, 2013 10:37:45 AM

Please please reconsider, it seems like there must be a better way than destroying our local ecosystem to protect against fire. Furthermore, the natural habitat must burn from time to time, this is not changed by our desire to use the area. Careful planning and design can help to mitigate the danger, we don't need to remove all these trees.

It really is a shame that this is even an option, especially the toxic herbicide use.

From: Jokia Mccall
To: EBH-EIS-FEMA-RIX
Subject: DON"T CUT THE TREES!!
Date: Friday, May 17, 2013 10:33:24 AM

PLEASE do not destory the trees in oakland and berkeley! It makes our community beautiful! I do not agree with this action!!!!! PLEASE DO NOT CUT THE TREES!

Jokia McCall
Administrative Assistant
Best Value Home Improvements
510-444-5903

From: Diana Shapiro
To: EBH-EIS-FEMA-RIX
Subject: Please don"t
Date: Friday, May 17, 2013 10:18:47 AM

Hello. I am a Berkeley resident and am very concerned about the current proposal of cutting down so many of our wonderful trees. Please remember that trees don't usually cause fires but they ALWAYS provide us with clean air that keeps us healthy and alive. We need those trees. Please leave them be.

Sincerely,
Diana Shapiro
2212 Browning St.
Berkeley CA 94702

Sent from my iPad

From: Ellen Gierson
To: EBH-EIS-FEMA-RIX
Subject: subscribe
Date: Friday, May 17, 2013 10:13:00 AM

From: Andie Grace
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills fire risk reduction
Date: Friday, May 17, 2013 10:07:36 AM

Thank you for this opportunity to comment. I cannot be there in person for a public meeting but do not support this plan to clearcut and spray Strawberry and Claremont Canyons with herbicides.

There MUST be some other way. Please do not clearcut this area and spray it with Roundup! You're talking about Berkeley, a city where many residents go to great lengths to avoid such toxins, and I do not think our community will stand for such exposure and risk.

I support uprooting and removing non native eucalyptus, and other reasonable fire prevention measures, but not the total toxification of the land and destruction of these two natural areas. Living against these areas is taking a certain risk of wildfires, but I think they can be controlled in other ways, and are a fact of life unless we're going to just pave the entire planet.

It'll be more work to only remove the invasives, but it's more on balance as a fairer approach to our living this close to nature.

-Andrea Grace
2729 Acton Street
Berkeley, CA 94702

From: Kathryn Roszak
To: EBH-EIS-FEMA-RIX
Subject: Tree removal
Date: Friday, May 17, 2013 10:05:20 AM

As a tax payer, these plans to remove trees need more study. The herbicides and the large areas of wood chips are of concern. Not to mention the lack of green as these areas are not planned for re planting. Native species won't grow there in the environment this creates. It seems a vast waste of resources and manpower. This needs more public review.

Response requested.

Kathryn Roszak

From: Jason Victor Serinus
To: EBH-EIS-FEMA-RIX
Subject: Please do not destroy trees in the East Bay Hills
Date: Friday, May 17, 2013 10:03:58 AM

Re: he draft EIS, which describes the proposed East Bay Hills hazardous fire risk reduction projects and potential environmental impacts on the natural, physical, and human environments in the project.

This is an absolutely horrible plan: destroying one of the great nature preserves in the East Bay Hills, replacing trees with wood chips, and poisoning all living things with Roundup. I strongly oppose this action.

jason victor serinus
Oakland, CA

Jason Victor Serinus • http://www.jasonserinus.com
Music and audiophile critic, Whistler Extraordinaire, and co-convener Oakland Community Policing Task Force
The Voice of Woodstock • The Pavarotti of Pucker

From: stuart phillips
To: EBH-EIS-FEMA-RIX
Subject: DO NOT CUT ANY TREES IN OAKLAND/BERKELEY CA EVER!
Date: Friday, May 17, 2013 10:02:30 AM

DO NOT CUT ANY TREES WHATSOEVER IN BERKELEY, OAKLAND, OR ANYWHERE IN THE BAY AREA OF CALIFORNIA, EVER!! THESE MISGUIDED PROJECTS WOULD ACTUALLY EXACERBATE FIRE BY DRYING OUT SOIL, CREATING MORE FLOOD & MUDSLIDE PRONE AREAS WHERE CUT, INCREASING HEAT TO AREA.
TREES SHADE, MOISTEN SOIL, KEEP WATER FROM RUNNING AWAY, KEEP SOILS INTACT, PROVIDE WILDLIFE & QUALITY OF LIFE HABITAT, SHADE ENVIRONMENT, CLEAN AIR.
DO NOT CUT ANY TREES IN OUR BAY AREA, EVER, THIS IS A HUGE WASTE OF MONEY THAT DESTROYS OUR LOCAL ENVIRONMENT TOTALLY AT BEST!
stu lips, oakland, ca

From: deanne quenzel
To: EBH-EIS-FEMA-RIX; EBH-EIS-FEMA-RIX
Date: Friday, May 17, 2013 10:00:37 AM

To whom it may concern,

I understand the need to remove some of the trees in the Berkeley and Oakland hills. The Eucalyptus is non native and a fire hazard. This I understand. What I don't understand is the intent to use powerful Herbicides to sterilize the hill. Have you no sense? Why not remove the Eucalyptus and plant Native Redwoods? I am also dismayed by the secrecy and scheming behind this. This is a very sad time for Americans and all mankind. I am tired of the Bureaucracy and dictatorship our government imposes on it's people and land.

Deanne Vargas

From: riva-isms
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills
Date: Friday, May 17, 2013 9:57:15 AM

Dear FEMA,

Clear-cutting the area in question to the tune of 85000 is a death sentence to the global community. Trees are the future of the planet. Reducing fire hazards must be accomplished in other ways. Every tree cut reduces the amount of oxygen in the atmosphere, and increases CO2 contributing to global warming. Herbicides will poison the groundwater of surrounding communities. This plan must not be passed.

Sincerely,

Riva Weinstein

rivaweinstein.com
917 747 8990

From: leandra darcy
To: EBH-EIS-FEMA-RIX
Subject: CUTTING DOWN TREES IS NOT THE BEST SOLUTION
Date: Friday, May 17, 2013 9:56:03 AM

Greetings

I understand that UC Berkeley has requested that 85,000 trees be cut down and replaced with woodchips and Round-up? What kind of logic goes into a decision like this? We live in an area and time in history where de-forestation poses greater threats to humanity then fire.

The trees sequester carbon which slows release of more carbon into the air. They provide habitat for a rich vibrant ecology of which humans are dependent and interdependent on to survive. They prevent land slides when there is rain, and they clean our air in a major metro area. And, last but least they provide a natural connection in a world slowly being paved over in the name of progress.

Also to mention, Round Up is highly toxic to all, and it will run into our water supplies and poison many ecologies in the entire area as the chemicals make their way into the ground water. Ever read Silent Spring? Ever hear about the travesty of the mis-use of DDT? Not to mention it won't last forever. Once the system clears the Round Up (a few seasons) small brush will start to grow in and it will require constant application of Round Up to keep the brush at bay. So more and more chemicals or even more fire hazards in the way of small brush which is much more flammable.

These trees have been here longer then the University and have not posed or demonstrated to be a fire hazard. Where is the long term thinking in this plan? Where is the rational and intelligent mind in creating solutions that work in harmony with our environment versus destructive short term solutions that only create more problems?

We need to start applying regenerative solutions to our issues rather then band aid solutions that ultimately make more problems. Please, let's be smart humans. Not stupid humans.

Best regards
Leandra Darcy Jones

From: inanesavoir@gmail.com on behalf of Ivonne Arias
To: EBH-EIS-FEMA-RIX
Subject: Deforestation of Strawberry and Claremont Canyons
Date: Friday, May 17, 2013 9:54:58 AM

Dear FEMA,

I write on behalf of myself and anyone who has ever tread the soil in Strawberry and Claremont Canyons to please reconsider these sanctuaries' deforestation. The prevenative deforestation and dousing of the land in herbicide will do more harm than good and is likely to adversely affect the East Bay area's water supply. I urge you to reconsider as well because as a UC Berkeley graduate, I know first-hand of the imperceptible beauty this area offers. Without cost.

Please don't destroy this area. It keeps us all sane here!

Yours,
Ivonne Arias

--
Ivonne Arias
BA English, French minor 2012
University of California Berkeley

From: Janet Jacobson
To: EBH-EIS-FEMA-RIX
Subject: FEMA"S Plan for our trees
Date: Friday, May 17, 2013 9:54:10 AM

NO, PLEASE, NO! I can't believe this is going to happen. There will be protests, I among them. STOP THIS PLAN, PLEASE.

From: Miles DeIaco
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees - This is ridicules
Date: Friday, May 17, 2013 9:49:36 AM

To whom it may concern,

The cutting of these trees is absurd! The fact that FEMA cleverly scheduled its three public meetings for mid and late May while UC Berkeley students were in finals or gone shows that this is not an honest decision. If any fire danger is truly present, a healthy thinning of the trees is all that would be necessary. And planning to use herbicides like roundup in our nature is unacceptable. This is not FEMA's land, this is all the people's land, and they should not be allowed to cut these trees down!!

--
Miles DeIaco
Audio Engineer/Mixer

Different Fur Studios
3479 19th Street
San Francisco, Ca 94110

Direct: 520.272.2214
Booking 415.828.4060

miles@differentfurstudios.com
www.differentfurstudios.com

From: Kester Allen
To: EBH-EIS-FEMA-RIX
Subject: Please don"t cut down the trees in Strawberry and Claremont Canyon
Date: Friday, May 17, 2013 9:17:14 AM

Please don't cut down the trees in Strawberry and Claremont Canyon.

Kester Allen

From: Arthur Perley
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees
Date: Friday, May 17, 2013 9:15:11 AM

We have real problems of trees and undergrowth posing fire hazards in the East Bay but this is completely nuts! FEMA and UC Berkeley will clear-cut 85,000 (!) trees, not replant, and "will cover 20% of the area in wood chips two feet deep. And it will pour between 700 and 1400 gallons of herbicide to prevent re-sprouting, including the highly toxic herbicide, Roundup." Preserve our natural beauty and our public spaces, don't make them a toxic waste dump! Re: http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees

--
Arthur Perley
El Cerrito

From: Jeff Gill
To: EBH-EIS-FEMA-RIX
Subject: Strawberry and Claremont Canyon
Date: Friday, May 17, 2013 9:06:22 AM

To whom it may concern,

I am writing in reference to the proposed plan of cutting down trees in Strawberry and Claremont Canyon. As a UC Berkeley employee I feel that it is not only unnecessary to complete this project for fire prevention as it hasn't caused an issue greater than any other forest area, but the fact that UC Berkeley is supporting spraying 1400 gallons of toxic herbicides into a regional park area is deplorable. I heed you to stop the nonsense and not go forward with this plan.

--
-Jeff Gill
jmgill@berkeley.edu
CSS - IT

From: juanxcaballero@gmail.com on behalf of Juan Caballero
To: EBH-EIS-FEMA-RIX
Subject: Anti-fire measures in Strawberry Canyon and Claremont Canyon, Berkeley/Oakland, CA
Date: Friday, May 17, 2013 9:05:06 AM

I use both canyons and I think clearcutting is excessive, and the 1400 gallons of pesticide absurd. Pretty sure the Sierra Club and local groups would love to donate the expensive time of specialists and experts that could come up with more reasonable ways of making a fire buffer.

Thank you,
__juan caballero
Oakland resident since 2003

--
Juan Caballero
PhD., University of California, Berkeley, 2013
Visiting Assistant Professor of Spanish & English
Christian Brothers University
Memphis, TN, 38104
Office: (510) 984 3015

From: Dana Harrison
To: EBH-EIS-FEMA-RIX
Subject: OBJECTION to plan
Date: Friday, May 17, 2013 9:04:16 AM

To Whom it May Concern:
I have recently become aware of the plan to cut 20,000+trees and spray herbicide to prevent regrowth in Strawberry and Claremont Canyons.

I wish to offer my very strong objection to this plan.

These two areas provide significant recreational opportunities to the hundreds of thousands of people who live in urban Berkeley and North Oakland. They create one of the few easily-accessible access points to nature for folks without cars -- and for their dogs. Destroying these areas and poisoning them with a highly-toxic chemical seems incredibly unwise, even dangerous and destructive to our community civic life and to our health.

Please reconsider this plan!

Dana Harrison
homeowner
2911 Lorina St.
Berkeley, CA 94705

From: Erica
To: EBH-EIS-FEMA-RIX
Subject: Claremont canyon clear cut
Date: Friday, May 17, 2013 9:02:37 AM

To whom it may concern,

Your plan of clearcutting and then using the highly toxic product Roundup in Claremont canyon and the surrounding hills is incredibly misinformed and shortsighted. I've done published botanical studies on the Claremont area, and there is no possible benefit to your management approach. Please desist immediately.

If you open a public forum and state the problems that you are trying to solve, which I assume are non-native species encroachment and fire hazard, you will find crowd sourced solutions which actually make sense, unlike your current solution which will only create more problems. You do know about intensive goat grazing which is being used in that area for vegetative management, right? Or did you not look at local solutions and just went with the solution from your 1950's handbook?

Stop. You're messing up.

Sincely,
Erica Kesenheimer.

From: Sharon Muczynski
To: EBH-EIS-FEMA-RIX
Subject: Killing trees and pouring herbicide
Date: Friday, May 17, 2013 8:56:39 AM

EGH_EIS_FEMA,

Dangerous and stupid idea to destroy trees, poison them, and then allow non-native grasses and weeds come in. The fire danger will increase with a huge load of dead weeds during the summer.

You are just destroying an active, vital ecosystem. This plan is a stupid, misguided hysterical reaction to fire threat. It is not science-based, but something I would expect from a backwards hillbilly town rather than in city with an academic history. You people are idiots!

Sharon Muczynski
muczynski.sharon@gmail.com

From: Marina Bear
To: EBH-EIS-FEMA-RIX
Subject: Strawberry Canyon Trees
Date: Friday, May 17, 2013 8:13:21 AM

I wish to register my serious opposition to the proposed clear cutting of trees in the Strawberry Canyon and Claremont Canyon area and especially the use of herbicides in that area. As a long-time hiker and lover of the Strawberry Canyon trail I cannot imagine that there is no other solution to fire prevention. Please reconsidered this decision.

Marina Bear

From: joyce
To: EBH-EIS-FEMA-RIX
Subject: NO on East Bay Hills Hazardous Fire Risk Reduction Program
Date: Friday, May 17, 2013 8:07:45 AM

Please DO NOT continue with the East Bay Hills Hazardous Fire Risk Reduction Program. I do not approve of this UNNECESSARY use of funds, and I am AGAINST this land MISMANAGEMENT. The destruction of the trees and subsequent use of the known toxic herbicide Roundup pose more of a DANGER than the threat of wildfire. Please DO NOT allow this program to move forward!!

Joyce Crowley

From: david.corsonknowles@gmail.com on behalf of David Corson-Knowles
To: EBH-EIS-FEMA-RIX
Subject: EIS constituent feedback
Date: Friday, May 17, 2013 7:57:03 AM

I am absolutely opposed to the cutting up of our public parks and lands in the Berkeley and Oakland hills.

Please do not pour pesticides on our public park lands where we take our children to learn about nature and see beautiful views of the Bay.

Please do not fund this project. Please do not allow it to happen at all.

Our parks are not a hazard. This proposed project is itself the public hazard.

Please implement the NO ACTION

Thank you,

David Corson-Knowles
3090 King Street
Berkeley, CA 94703

From: Eric Storm
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project.
Date: Friday, May 17, 2013 7:46:41 AM

One of the primary reasons why the climate is changing and increasing the fire danger to the Oakland hills is that so much natural beauty, forest and wild lands are being destroyed. You are creating your own desert. Once the Bay Area was a place of lush beauty, but the paving over and cutting of trees has steadily helped create a hotter drier climate. The destruction of these trees will further perpetuate the transformation of the Bay Area into an arid climate. If you want to really protect this area while reducing fire danger then clearing out some of the underbrush would make sense, but completely removing it is absurd!

From: Marna Clark
To: EBH-EIS-FEMA-RIX
Subject: PLEASE - DON"T CUT BERKELEY TREES
Date: Friday, May 17, 2013 7:35:16 AM

OMG ! Couldn't believe what I was reading when I learned that the Government wants to clear-cut, then put ROUNDUP, on the trees in Strawberry Canyon. PLEASE RECONSIDER !!

YES, PLEASE RECONSIDER. WORST MISTAKE EVER. EVERYONE WILL REGRET THIS. ANIMALS WILL DIE.
LAND WILL SLIDE. THOUSANDS OF RUNNERS/WALERS WILL LOSE A BEAUTIFUL AND WELL USED TRAIL.

OMG! I CAN'T BELIEVE THIS WOULD BE HAPPENING.

IT LIKE A TREE HOLOCOST!!!!

From: NICHOLAS JAY STEWART
To: EBH-EIS-FEMA-RIX
Subject: Stop Clear Cutting in Berkeley and Oakland!
Date: Friday, May 17, 2013 7:33:02 AM

To all it concerns,

Just like the Bay, the trees of Berkeley and Oakland define the two cities. These two cities, especially in Berkeley because it is where I live, have a remarkable character about them many cities lack. This character lies in the opportunity city goers have to travel only 5-10 minutes from the busy and crowded city to an overwhelmingly beautiful and quiet natural retreat. The trees, like the Bay, are a priceless resource of constant appreciation that people in Berkeley and people that visit Berkeley remark about with thankfulness and admiration. My friend visited me in Berkeley, and the thing that struck her with the most wonder was " All the trees!". Most cities lack the dual testaments to man-made ingenuity and natural tranquility that Berkeley and oakland have to offer. And, like when the Bay was threatened to be filled, the Bay area will rally to stop the trees from being exterminated. We all share a combined affection for the defining characteristics of the city, the trees and the Bay, and will rally if anything else is threatened to be destroyed. I don't want wood chips, I don't want Roundup herbicide, and I don't want Berkeley harmed! I want the trees, just like we all want the Bay.

Sincerely,

Nick Stewart

University of California Berkeley, Junior

P.S. I do have a final today and should be studying frantically instead of writing this, but some things are more important.

From: Sarah Benson
To: EBH-EIS-FEMA-RIX
Subject: NO to tree removal in Strawberry and Claremont Canyons!
Date: Friday, May 17, 2013 7:21:34 AM

To whom it may concern,

I was horrified to learn about the planned tree removal in Strawberry and Claremont Canyons. This will cause untold harm to Berkeley's beautiful environment and will destroy one of the most lovely areas in town - my beloved hometown. I urge you to cancel this terrible plan.

Sincerely,
Sarah Benson

From: Emily Lundberg
To: EBH-EIS-FEMA-RIX
Subject: 85,000 Trees in the East Bay
Date: Friday, May 17, 2013 7:00:47 AM

The trees in Strawberry and Claremont Canyon have been there for decades and hardly constitute a "hazard." But pouring 1400 gallons of herbicide on the currently pristine hills will create a real hazard, and UC Berkeley even plans to use the highly toxic herbicide "Roundup" to squelch the return of non-native vegetation.

These projects are more likely to **increase the risk of wildfires** than to reduce that risk.

By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will **damage the environment** by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will **endanger the public** by dousing our public lands with thousands of gallons of toxic herbicides.

* **Erosion** is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* **Non-native vegetation** such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* **Prescribed burns** will pollute the air and contribute to the risk of wildfire, endangering lives and property.

* These projects are an **inappropriate use of the limited resources** of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

These public lands belong to us and the money that will be used to implement these projects is our tax dollars -- do not cut down those trees!

Emily E. Lundberg,

1500 Park Ave., Emeryville, CA 94608

From: Bill Kristy
To: EBH-EIS-FEMA-RIX
Subject: oppose cutting Trees in Berkeley/Oakland
Date: Friday, May 17, 2013 6:57:23 AM

I very strongly oppose the outrageous plan to chop down trees in Berkeley and Oakland and apply herbicide.

From: Shane Mason
To: EBH-EIS-FEMA-RIX
Subject: Regarding Strawberry Canyon Risk Reduction Project
Date: Friday, May 17, 2013 6:45:15 AM

Hello,

I am a Bay Area Cal Alumnus and I lived just below Strawberry Canyon for 3 years while I went to Cal. It would be an incredible shame to destroy that beauty and use herbicides to ensure it never comes back again. This would be a terrible action to take against everyone who lives and hikes in that area.

I understand the need for wildfire risk reduction, but the public needs to be included in this decision. Please reschedule the meetings for a time when students can actually come i.e. during summer session or during the school year.

Thank you for your consideration,

Shane

From: Janice Henderson
To: EBH-EIS-FEMA-RIX
Subject: Strawberry & Claremont Canyon / East Bay Clearcutting
Date: Friday, May 17, 2013 6:31:38 AM

I stand in opposition to FEMA's plan to destroy the trees in Berkeley's historic Strawberry and Claremont Canyons and the clearcutting in Oakland East Bay. I also oppose the plan to spray these areas with highly toxic herbicide chemicals. The environmental impact to wildlife and humans is too great. Do not go forward with this plan.

Sincerely,
Janice Henderson

From: Christine Berger
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Hazardous Fire Risk Reduction
Date: Friday, May 17, 2013 5:52:33 AM

There is no need for this wanton destruction of living healthy trees.
If that were not enough the idea of putting wood chips soaked in the most poisonous compound around, Round-Up, is insane.

Is this really the kind of heritage you want to leave, the mark you want to leave on the East Bay?

--
Christine

From: Chris
To: EBH-EIS-FEMA-RIX
Subject: clear cutting Oakland and Berkeley trees
Date: Friday, May 17, 2013 5:17:49 AM

What? Are you CRAZY?

http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees

You're going to destroy a big part of the LUNGS of our cities and replace them with wood chips and ROUNDUP?

Don't you know that stuff is POISON and will get into the soil and water supply?

NO. ABSOLUTELY NO!

I OBJECT.

Take your stupid, destructive idea and SHOVE IT.
Get OUT of here.
You are disgusting.

Christine Hanson

From: nate hanson
To: EBH-EIS-FEMA-RIX
Subject: Please reconsider the current proposals for fire hazard mitigation of the East Bay
Date: Friday, May 17, 2013 3:39:29 AM

While I understand the need for preventative measures against wildfires in the hills, is massive clear-cutting the best solution? Surely there are less drastic alternatives.

In terms of ecological damage, the eucalyptus tree presence is debatable. But even granting that, is the erosion caused by 5-10 years of strongly limited regrowth worth it?

At the very least, I strongly urge you to consider alternatives to the herbicide triclopyr. It is mildly to highly toxic to insects and fish, and Berkeley's Strawberry Creek would be vulnerable.

The Oakland hills are beautiful, and as an avid trail runner, hiking enthusiast, and bicyclist along Skyline Drive and Grizzly Peak Blvd, I hate to think of the eyesore caused by destruction of hundreds of acres of beautiful forest.

Best,
Nate Hanson
854 Isabella St
Oakland, CA 94607
760.717.3370 | nathaniel.j.hanson@gmail.com

From: Megan Guaraglia
To: EBH-EIS-FEMA-RIX
Subject: clear cutting in berk oak hills
Date: Friday, May 17, 2013 1:18:03 AM

Hello my name is Megan Guaraglia, I am a registered voter in the east bay area. I strongly oppose the cutting down of the trees in our neighborhood, such little forest is left as is, to cut down so many trees would be appalling and tragic. We need places to run and hike and enjoy nature. I see no legitimate reason for this to occur please cease and assist!

From: Douglas Grue
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills
Date: Thursday, May 16, 2013 11:55:08 PM

Dear Fema,

Surely with all the brains and wisdom within your organization you can create a better plan than distruction of habitat and thousands of trees. Trimming trees and undergrowth is a good idea. Complete removal is another story entirely.

I am opposed to this iteration of the project.

Douglas Grue
Registered Voter
Oakland, CA

From: Hillary Brooks
To: EBH-EIS-FEMA-RIX
Subject: don"t destroy our trees
Date: Thursday, May 16, 2013 11:54:10 PM

To FEMA:

Berkeley needs trees and our earth needs trees, now more than ever! This plant to raze Strawberry Canyon and thousands of local trees here and in Oakland and contaminate our area with herbicides is shockingly wrong-headed.

There has got to be another way. I had to write as soon as I heard this, and I am moving next to tell my friends and neighbors about this sneaky plan.

Hillary Brooks
2634 Acton St
Berkeley, CA 94702

From: CMB
To: EBH-EIS-FEMA-RIX
Subject: I oppose East Bay Hills hazardous fire risk reduction project
Date: Thursday, May 16, 2013 11:50:37 PM

To whom it may Concern,

I oppose East Bay Hills hazardous fire risk reduction project. I do not support the cutting down of any tree. I believe that is horrible to consider dumping 14,000 gallons on herbicide on the land. This is our land. Do not come and harm it or the trees.

Regards,
Cassie

From: Evan Daly
To: EBH-EIS-FEMA-RIX
Subject: Please explain why you plan to murder 10s of 1000s of trees, and
Date: Thursday, May 16, 2013 11:11:28 PM

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destroy the ground we live on. This is an unprecedented environmental holocaust, and must be stopped. The people behind this project are operating far from the standpoint of considering anything on this great Earth sacred. WHAT DO YOU THINK YOU ARE DOING? YOU ARE LITERALLY KILLING THE PLANET, AND EVERYONE INVOLVED, WITHOUT DISCRETION. This Earth is not your toy, and has no place for a bunch of maniacal lunatics destroying its environment, and saturating it in toxic, poisonous chemicals. There is no logic, deductive reasoning, or money that can justify your actions. Cease and desist.

From: Evan Daly
To: EBH-EIS-FEMA-RIX
Subject: Please explain why you plan to murder 10s of 1000s of trees, and
Date: Thursday, May 16, 2013 11:11:28 PM

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destroy the ground we live on. This is an unprecedented environmental holocaust, and must be stopped. The people behind this project are operating far from the standpoint of considering anything on this great Earth sacred. WHAT DO YOU THINK YOU ARE DOING? YOU ARE LITERALLY KILLING THE PLANET, AND EVERYONE INVOLVED, WITHOUT DISCRETION. This Earth is not your toy, and has no place for a bunch of maniacal lunatics destroying its environment, and saturating it in toxic, poisonous chemicals. There is no logic, deductive reasoning, or money that can justify your actions. Cease and desist.

From: jessicabowen6648@comcast.net
To: EBH-EIS-FEMA-RIX
Subject: FEMA clear-cutting of millions of trees in the San Francisco Bay Area
Date: Thursday, May 16, 2013 11:09:24 PM

To whom it may concern:

These projects are more likely to **increase the risk of wildfires** than to reduce that risk.

By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will **damage the environment** by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will **endanger the public** by dousing our public lands with thousands of gallons of toxic herbicides.

* **Erosion** is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* **Non-native vegetation** such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* **Prescribed burns** will pollute the air and contribute to the risk of wildfire, endangering lives and property.

This project is far from the mandate of FEMA. These projects are an **inappropriate use of the limited resources** of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

This project must be halted. Your agency is overreaching (seems to be a common practice in the 21st century).

Sincerely,

Jessica Bowen

Alameda, CA

From: Sonia Gill
To: EBH-EIS-FEMA-RIX
Subject: destroying our natural environment
Date: Thursday, May 16, 2013 10:41:29 PM

To whom it may concern:

I am sorry that recent fires have destroyed people's property in the Oakland and Berkeley Hills. But, cutting down all the trees and spraying the area with Roundup and poisoning us is not the answer. Please do not destroy our natural and beautiful environment. I am really sick about this decision to kill the trees. Enough. Let nature through!

Sonia Gill
Berkeley, Ca 5/16/2013

From: Robin Kincade
To: EBH-EIS-FEMA-RIX
Subject: Berkeley trees
Date: Thursday, May 16, 2013 10:37:27 PM

I vote. I strongly ask that you please do NOT clear cut or cut the trees in Berkeley California. I don't want to see this happen.

I do vote

and if FEMA chooses to do this outrages act, ill contact my rep and howl.

Robin Kincade
robinkincade.com
Sent by my brain

From: Christopher Hobbs
To: EBH-EIS-FEMA-RIX
Subject: "Hazardous Fire Risk Reduction" proposal
Date: Thursday, May 16, 2013 10:24:35 PM

Hello,

After reading the draft EIS associated with the fire risk reduction proposal, I will have to strongly state that I believe that native shrublad should not be clear cut. In addition, I feel that applying toxic herbicides to extensive areas to prevent resprouting is a very bad idea.
These actions will clearly have a significant detrimental impact on insects, small mammals, and other wild animals living in the areas that are targeted for treatment.

Cutting eucalyptus and nursery stock monterey pines--maybe that has some merit, but not the use of extensive herbicide use in public lands and wild areas. This is not rational, considering the effects to the ecology of these areas.

Thank you,

Christopher Hobbs, Ph.D. Candidate
Integrative Biology
Botanist and naturalist with 38 years of experience in California's wild areas
hobbs@berkeley.edu

From: David Johnson
To: EBH-EIS-FEMA-RIX
Subject: Support for removal of eucalyptus from East Bay hills
Date: Thursday, May 16, 2013 9:55:26 PM

To whom it may concern:

This note is to applaud FEMA's plan to remove large numbers of mature eucalyptus trees from the the East Bay hills area (San Francisco Bay region). They are a serious fire danger, as we saw in the catastrophic Oakland Hills fire. They are invasive in the exact sense, smothering native trees and shrubs. I have lived in Berkeley for over 40 years and love walking and driving through the hills. Many times have I looked at the eucalyptus forests and despaired that they could ever be removed. So the news that there may be a large-scale removal project is thrilling to me. Many years ago there was a hard freeze that killed many eucalyptus near where I live; the huge stumps can still be seen--surrounded by beautiful wild spaces covered with native plants, shrubs and trees, none of which would be there if the eucalyptus had not been cut down.

You will I am sure get passionate letters denouncing the plan. These will be from well-meaning people who do not understand or cannot imagine any alternative tothe status quo. But the eucalyptus are a plague and eliminating them would be, in the long run, a great blessing.

Best regards,
(Professor) David Johnson
3079 Shasta Road
Berkeley 94708
510-548-9831

From: bruno ruhland
To: EBH-EIS-FEMA-RIX
Subject: TREES
Date: Thursday, May 16, 2013 9:52:58 PM

Chopping down 87000 trees in the East Bay hills is a terrible out of control government bureaucracy wasting money on destructive crap idea. Don't do it! Thank you. Bruno Ruhland

From: Jonathan Reynolds
To: EBH-EIS-FEMA-RIX
Subject: berkeley/oakland clear cut
Date: Thursday, May 16, 2013 9:48:56 PM

Please don't clear cut in the Strawberry and Claremont Canyon areas of Berkeley.

Thank you,

Jonathan

--
Jonathan Reynolds, MFT Intern (Registration Pending)
Mindfulness-Based Psychotherapy & Meditation
Supervised by Eugene Porter, MFT #19703
Grateful Heart Holistic Therapy Center
http://www.ayogisway.com
--
Co-Founding Editor, Journal of Holistic Psychology
http://www.journalofholisticpsychology.com

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From: Darrin Weyers
To: EBH-EIS-FEMA-RIX
Subject: Opposed to clearing of trees in Claremont & Strawberry Canyons
Date: Thursday, May 16, 2013 9:05:54 PM

Hello,

I am one of the many people who use these wooded areas several times a week for recreation. These canyons are a real treasure and I am opposed to the plan to clear trees and apply herbicides. I will spread the word to the community and hope that the public is given a chance to provide input on this plan.

Darrin Weyers
Oakland, CA

From: Linda Pazdirek
To: EBH-EIS-FEMA-RIX
Subject: Tree removal in Berkeley, Ca
Date: Thursday, May 16, 2013 8:28:08 PM

To Whom it May Concern,

I just heard about fema's plans to clear cut in the strawberry and claremont canyons and more. I strongly object to this project, as well as the plans to spray Round-up to prevent re sprouting. This is a beautiful part of our community and it will be a great loss.

Linda Pazdirek, MFT
LIC #40145
510.982.6332

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From: marit bk
To: EBH-EIS-FEMA-RIX
Subject: Fire safety in the Berkeley/ Oakland hills
Date: Thursday, May 16, 2013 8:25:53 PM

TO WHOM IT MAY CONCERN:

Hello,
As an avid hiker in the East Bay, I am very aware of how important it is for wildlife to have undeveloped land next to the urban areas. I just heard that there are proposed plans from FEMA to clear cut in the Strawberry and Claremont canyons in order to reduce a fire danger. Aside from removing huge groves of trees and destroying much needed wildlife habitats, there are potential plans to cover the ground in toxic herbicides. I am STRONGLY opposed to both of these plans. This cannot happen. I would like to see some environmentally sensitive measures taken to address the fire safety issue. There are ways to thin growth without destroying the forest. This proposal seems akin to cutting off one's foot in order to prevent an accidental foot injury.

Marit Brook-Kothlow
1732 7th Street
Berkeley, CA 94710

From: jen@twowingsyoga.com
To: EBH-EIS-FEMA-RIX
Subject: don"t destroy berkeley"s historic strawberry and claremont canyons
Date: Thursday, May 16, 2013 7:56:13 PM

---

dear sirs,

it is with a heavy heart and an astounded mind that i write having just heard of your plans to remove 85,000 trees in our community. and, to ask how uc with federal funds can possibly decide to make such an egregious error against the environment in the name of 'reducing fire hazard'.

please don't destroy berkeley's historic strawberry and claremont canyons. after all, the choice is truly not yours alone to make and such a self-interested decision will certainly come back to haunt us all. aside from the loss of the trees, the use of herbicides at the proposed level boggles the mind/sickens the heart.

your plan in the name of 'safety', if that is indeed the cover you're hoping to hide behind, is just wrong-headed. hopefully, our community will not stand for it. and, if all else fails, will not forgive you for it.

so, think again, folks...there's more at stake than your own interests/needs...we are but stewards for this land. our time here is but temporary. if not for yourselves, do it for your kids/grandkids.

thank you for your thoughtful consideration.

peace,
jen

jen burk reynolds
san francisco bay area
http://www.twowingsyoga.com
LOVE SERVE REMEMBER

From: Jing
To: EBH-EIS-FEMA-RIX
Subject: Unjustified
Date: Thursday, May 16, 2013 7:00:51 PM

An incredibly important fact, that area is already a landslide zone. So by destroying all plant life and killing the root system, the next Big earthquake will most likely cause a disastrous landslide. I'm not entirely sure which areas of trees you plan on cutting down, but that could lead to widespread destruction.

Plus I really don't see how replacing the entire area with wood chips and then killing all plant life with herbicide would help prevent fires. It seems like the wood chips would become incredibly dry and turn into tinder. Thus creating a giant tinderbox for the next fire to instantly erupt, and that will be mixed with all the toxic by-products from the combustion of the pesticide.

You need to address these issues for me, otherwise I will widely distribute this information and the operation will be stopped.
- Jing

From: Carol LaPlant
To: EBH-EIS-FEMA-RIX
Cc: "Michael L. PALMER"
Subject: Clear cutting and herbicide spraying in Claremont Canyon
Date: Thursday, May 16, 2013 6:57:33 PM

I am a frequent runner and hiker in Claremont Canyon and the other trails of the East Bay hills. I am a resident of Berkeley. I write to express my strenuous opposition to the proposed clear cutting and herbicide spraying in these areas. The proposed activity would do irreparable damage to one of the most beautiful nature areas in the Bay Area.

Carol P. LaPlant
89 Menlo Place
Berkeley, CA 94707

From: bdwcgpx@gmail.com on behalf of bdwc
To: EBH-EIS-FEMA-RIX
Subject: AGAINST the alleged fire risk reduction activities
Date: Thursday, May 16, 2013 6:09:00 PM

I agree with Million Trees' assessment of the U.S. Department of Homeland Security's Federal Emergency Management Agency's proposed hazardous fire risk reduction activities. Please include my objections, outlined below, in the Environmental Impact Statement (EIS) for Alameda and Contra Costa counties and in the Miller Knox/Shoreline. Let's bring this to a full stop.

* These projects are more likely to increase the risk of wildfires than to reduce that risk.

By distributing tons of dead wood onto bare ground

By eliminating shade and fog drip which moistens the forest floor, making ignition more likely

By destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California

By expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood

* These projects will damage the environment by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

* These projects will endanger the public by dousing our public lands with thousands of gallons of toxic herbicides.

* Erosion is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

* Non-native vegetation such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

* Prescribed burns will pollute the air and contribute to the risk of wildfire, endangering lives and property.

* These projects are an inappropriate use of the limited resources of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

--

Brandon Williamscraig Ph.D.
5739 McBryde Ave
Richmond CA 94805
public@bdwc.net

From: Rich Buckley
To: EBH-EIS-FEMA-RIX
Subject: NonNative Tree Removal
Date: Thursday, May 16, 2013 5:49:19 PM

Please place me on your emailing list.

Rich

Rich Buckley
Rich Buckley Realty
www.BuckleyRealty.com
925-443-1122
Sent from my iPad

From: stuart phillips
To: EBH-EIS-FEMA-RIX
Subject: DO NOT CUT ANY TREES IN OAKLAND/BERKELEY CA EVER!
Date: Thursday, May 16, 2013 5:41:37 PM

DO NOT CUT ANY TREES WHATSOEVER IN BERKELEY, OAKLAND, OR ANYWHERE IN THE BAY AREA OF CALIFORNIA, THESE MISGUIDED PROJECTS WOULD ACTUALLY EXACERBATE FIRE BY DRYING OUT SOIL, CREATING MORE FLOOD & MUDSLIDE PRONE AREAS WHERE CUT, INCREASING HEAT TO AREA.
TREES SHADE, MOISTEN SOIL, KEEP WATER FROM RUNNING AWAY, KEEP SOILS INTACT, PROVIDE WILDLIFE & QUALITY OF LIFE HABITAT, SHADE ENVIRONMENT, CLEAN AIR.
DO NOT CUT ANY TREES IN OUR BAY AREA, EVER, THIS IS A HUGE WASTE OF MONEY THAT DESTROYS OUR LOCAL ENVIRONMENT TOTALLY AT BEST!
stu lips, oakland, ca

From: Judy Weiss
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills Environmental Impact Statement
Date: Thursday, May 16, 2013 5:23:39 PM

Dear FEMA Staff:

I am writing in support of the rapid approval of the EIS concerning the removal of eucalyptus and other hazardous vegetation in the East Bay Hills to mitigate wildfire hazards. These projects have been well studied and the EIS findings of improving the safety and long-term enhancement to the area should move forward expeditiously. I know that the removal of the eucalyptus and other highly flammable vegetation from the north side of Claremont Canyon, replacement/regrowth with native plants, and diligent follow-up to discourage regrowth and weeds, as what has been down with the south side of the canyon, will result in a more natural healthier landscape. As a neighbor of Claremont Canyon, and a frequent visitor (biking, running and hiking), I am fearful of a devastating wildfire that could occur during windy, hot, dry weather.

Thank you in advance for supporting this important work. Please approve the EIS as is, and soon, so that the projects can move forward without further delay.

Sincerely,

Judy Weiss
6012 Auburn Avenue
Oakland, CA 94618

From: Sandra Michaelis
To: EBH-EIS-FEMA-RIX
Subject: FEMA Plans Clear-Cutting of 85,000 Berkeley and Oakland Trees
Date: Thursday, May 16, 2013 5:17:43 PM

I would not like to see this kind of destruction of trees and vegetation. Families chose to live in these communities knowing that fires are always a possibility. What about the impact of the loss of that vegetation and the means used to prevent new growth. I would hope that FEMA would reconsider this decision.

Sandra.

925-264-5900 home

From: Karen Keeshan Suarez
To: EBH-EIS-FEMA-RIX
Subject: Canyon tree removal
Date: Thursday, May 16, 2013 5:14:49 PM

Regarding the Federal Emergency Management Agency plan to cut down 22,000 trees in Berkeley's historic Strawberry and Claremont Canyons and over 60,000 more in Oakland.

Fire management is a good thing. Fuel reduction of overgrowth, and removal of non native invasive plants is great. The native trees are not the problem. Total vegetation removal is a disaster in the making.

The Coastal Live Oak tree in my front yard could someday catch fire. It could spread to my home and burn it to the ground.
I could roll around in a wheel chair to prevent ever falling too.

Native trees are necessary for life. Do the right thing, and work with the community for the betterment of all.

Thank you for your consideration
Karen K. Suarez
Monrovia, CA

From: Jackie Hasa
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills hazardous fire risk reduction project
Date: Thursday, May 16, 2013 5:13:13 PM

Dear FEMA,

I write to express my extreme dismay at learning that FEMA is planning to remove thousands of trees in Berkeley and Oakland, with the very thin justification that these constitute a fire hazard. These trees have been an important, beautiful part of the environment in the East Bay for hundreds of years, and if these trees are a fire hazard, then truly most trees in all of California's populated areas are as well. Please do not move forward with this damaging, potentially disastrous plan.

Thank you.

Jackie Hasa, former UC Berkeley student and East Bay commuter

From: gay auerbach
To: EBH-EIS-FEMA-RIX
Subject: Support of EIS for East Bay Hills
Date: Thursday, May 16, 2013 4:49:44 PM

Dear FEMA,

We strongly support the wildfire hazard mitigation projects for the East Bay Hills. The EIS findings that removal of non-native eucalyptus trees would improve fire safety and likely enhance the land on our coastal hills convince us that the project should move forward as soon as possible. We who live close to Claremont Canyon know how exploding eucalyptus trees can fuel devastating fires, and we would love to see a return to the native vegetation that burns much less dangerously when it does catch fire than the invasives do.

Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,
Gay and Alan Auerbach
110 El Camino Real
Berkeley

From: Tom Walker
To: EBH-EIS-FEMA-RIX
Subject: Clear cutting of trees on East Bay Hills
Date: Thursday, May 16, 2013 4:37:15 PM

I am completely opposed to the plan to remove hundreds of thousands of trees from our hills in the name of “fire prevention”.

Has FEMA not heard of global warming and the positive effects of trees on the problem?

Tom Walker

From: Adam
To: EBH-EIS-FEMA-RIX
Subject: a foolish plan
Date: Thursday, May 16, 2013 4:29:49 PM

Please,please listen to the voice of reason and DO NOT clear cut the Oakland and Berkeley hills. I am a Berkeley grad (1972) and I clearly remember the big freeze of 1972 when the eucalyptus trees froze and the "experts" wanted to cut down every tree. Thankfully, cooler minds prevailed, and those trees are still there and thriving.

Clear cutting is a foolish proposition and will satisfy no one. PLEASE reconsider this idiotic decision.

Get advice from some intelligent foresters, not FEMA.

thank you
Adam Reed
Ashland Oregon

Sent from my iPad

From: Lillian Gonzales Brown
To: EBH-EIS-FEMA-RIX
Subject: The destruction of 80,000 trees in Berkeley/Oakland area.
Date: Thursday, May 16, 2013 3:30:56 PM

While I am not currently living in the Berkeley/Oakland area, it has been my home in the past, and will be in the future. The plan to burn 80,000 trees in these areas and then pour herbicides to prevent future growth is incredibly short sited and destructive. I understand that Eucalyptus trees burn fast and furious, but the approach of just chopping them down follows the sentiment of "If you've seen one tree, you've seen them all". There is no need to decimate entire areas.

To add a plan of herbicide spraying is courting disaster. The long term disastrous effects of using products like Roundup is well documented. While I understand the need to be cost effective, the proposed plan is overkill to say the least. The fires that devastated the Oakland/Berkeley Hills came within a mile of my home, so I am well aware of what an out of control fire can do, but the proposed solution is short of saying nothing that will burn can be put in those areas at all. There are other solutions that may take more time and cost more, but will serve the community better. Please take this letter into consideration, and know that it represents the feelings of many. Thank you for your time and consideration.

Lillian Gonzales Brown.

Sent from my iPad

From: Scott Wheeler
To: EBH-EIS-FEMA-RIX
Subject: No cuts, no herbicide, no Roundup, period.
Date: Thursday, May 16, 2013 3:29:21 PM

From: Charlene M. Dexter
To: EBH-EIS-FEMA-RIX
Subject: tree cutting
Date: Thursday, May 16, 2013 3:21:37 PM

It is hard to fathom that you would cut down all those trees. I hope you reconsider killing those trees.

From: Barbara Silverberg
To: EBH-EIS-FEMA-RIX
Subject: Re: Support of EIS for East Bay Hills
Date: Thursday, May 16, 2013 3:16:05 PM

Re: Support of EIS for East Bay Hills

Dear FEMA,

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term enhancement to the land should move forward without delay. We Claremont Canyon residents know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive. Thank you for supporting this important work. Please approve the EIS as soon as possible.

Sincerely,
Barbara Silverberg
1909 Tunnel Road
Berkeley, CA 94705

From: Aileen Frankel
To: EBH-EIS-FEMA-RIX
Cc: Howard Matis
Subject: Endorsement of the Fire Risk Reduction project in the East Bay
Date: Thursday, May 16, 2013 3:11:38 PM

Dear FEMA

I support the fire risk reduction project in the Oakland & Berkeley Hills and strongly endorse
your proposed elimination of hazardous, flammable eucalyptus and pine trees along the wind-prone
East Bay Hills of California.

Your EIS and other environmental reviews should be approved immediately.

Please keep me informed of your progress in this matter.

Sincerely,

Aileen Frankel
15 Binnacle Hill
Oakland, CA 94618

(Yes, I live in a subdivision of homes that were completely destroyed by the 1991 Hills Firestorm.)

From: joanne cohn
To: EBH-EIS-FEMA-RIX
Subject: fire hazard, straberry/claremont canyons
Date: Thursday, May 16, 2013 3:03:15 PM

Hi,
Please do not cut down the 22,000 trees in these canyons (and please do not replace them with herbicide laden wood chips!). We do not want this poison in our neighborhood, leeching into the air and poisoning us, and our children.
Thank you,
Joanne

From: Adam and Jennifer Reed
To: EBH-EIS-FEMA-RIX
Subject: Destruction of Strawberry and Clarement Canyons, Berkeley and Oakland
Date: Thursday, May 16, 2013 3:03:10 PM

What are you thinking? The plan to cut 80,000 trees and then dump over a thousand gallons of herbicide to utterly destroy two habitats is as bizarre and senseless and it is outrageous: destroy Nature in order to save what exactly? Is there an agenda to build subdivisions in these beautiful canyons and this is the way to railroad it through?

What's the real agenda here? What is the real thinking here? Destroy Nature so you won't have to spend money on firefighters? This outrageous, insane plan must be canceled.

My husband is a graduate of UC Berkeley. He's busy arranging hospice care for his dying father in Southern California. I write on his behalf.

Jennifer Reed
Ashland, OR

From: Julie Andersen
To: EBH-EIS-FEMA-RIX
Subject: FEMA East bay Hills website issue
Date: Thursday, May 16, 2013 2:58:38 PM

Hello,

When I click on the cover page, abstract, Table of contents link for the DEIS on the http://ebheis.cdmims.com/Documents.aspx website, I receive the following error:

Duplicate headers received from server

The response from the server contained duplicate headers. This problem is generally the result of a misconfigured website or proxy. Only the website or proxy administrator can fix this issue.
Error 349 (net::ERR_RESPONSE_HEADERS_MULTIPLE_CONTENT_DISPOSITION): Multiple distinct Content-Disposition headers received. This is disallowed to protect against HTTP response splitting attacks.

You may want to address this issue to make the DEIS more useable for people who are viewing it online.

-Julie

From: Tracy Lenihan
To: EBH-EIS-FEMA-RIX
Subject: The clear cutting CANNOT HAPPEN!
Date: Thursday, May 23, 2013 9:33:15 AM

I am a Berkeley native that has lived in the area all of my life. I thoroughly object to your plans of clear cutting the proposed 85,000 trees in the Berkeley and Oakland area as well as plans to not replant AND to herbicides. This is EGREGIOUS and as many scientist, activists and ecologist can attest to completely unnecessary. These trees have been here for years and are hardly the "Hazard" that they claim to be.

FEMA CANNOT fund this!!! I object, my family objects my community objects to this!!!

Tracy Lenihan
2107 Grant Street
Berkeley CA

From: AVB Travel & Tour
To: EBH-EIS-FEMA-RIX
Subject: pro Oakland Berkeley tree removal
Date: Thursday, May 23, 2013 9:15:34 AM

Dear FEMA;

I am a resident of Oakland and am 100% in favor of removing eucalypts trees from the Oakland Berkeley hills. They represent a terrible fire hazard. I was here in Oct 91. Euc's don't catch on fire, they explode in flames. Not wild about the herbaside, but the trees must go.

Thanks, Hugh Smith

From: Kerry Bramhall
To: EBH-EIS-FEMA-RIX
Subject: FEMA Tree destruction in Berkeley
Date: Thursday, May 23, 2013 8:12:14 AM

To whom it may concern,
I am writing in regards to the plans for the total destruction of the ecology and natural beauty of the the trees in Strawberry Canyon and the Berkeley hills. I believe the plan is positively outrageous, destructive, haphazard, impulsive, and to use Roundup (known to cause cancer and environmental damage to ground water and humans) is outright shameful. The loss of the trees will cause far greater damage than the risk of fire which although inherent to the area, can be prevented (look to southern California Malibu area for advice.) I grew up in the area and spent summer after summer walking trails and learning about the natural environment that makes Berkeley beautiful. Families, children, college students (who pay a premium to attend school surrounded by tree filled surrounding hills) and anyone paying property taxes in that area will surely feel the loss and added costs. Not to mention the higher risks of cancer from walking upon the chemicals known to cause it.
PLEASE CONSIDER ANOTHER OPTION BESIDES DESTRUCTION!!!!! PLEASE EXAMINE THE DETRIMENTAL DAMAGE CAUSED BY ROUNDUP CHEMICALS!!!

PLEASE RE-OPEN PUBLIC COMMENTS SESSIONS FOR STUDENTS AND RESIDENTS!!!

thank you

E.Kerry Bramhall,LICSW
1904 Third Ave, Suite 1013
Seattle, WA 98101
206-850-6175

www.professionalcounseling.biz

From: Armando Davila
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills.
Date: Thursday, May 23, 2013 8:11:09 AM

As a citizen of the East Bay in the coming global warming crisis we will need all the healthy trees we can get.
Thus all trees need to be replanted in the East Bay and Oakland Hills and no toxic chemicals should be used.

Please amend your plans to deal with the fire hazard by planting new trees and abstaining from toxic chemicals!
--
Here for all of us. Mando.

From: Joyce Cochran
To: EBH-EIS-FEMA-RIX; "Hills Conservation Network"
Subject: EIS for UC, Berkeley, and EBRPD Projects
Date: Thursday, May 23, 2013 8:08:40 AM

Dear FEMA Representatives,

Deforestation/Clearcutting of Berkeley Hills is NOT the way to protect against fires: The EIS Draft needs to be modified to a plan that removes dry brush, dead trees, etc. but PROTECTS the Healthy TREES because Trees are what make our neighborhoods, towns, countries, and world LIVABLE. Denuding an area of Trees to Protect against Fire is Short-sighted and Destructive.

1. Retract the plan to use a herbicide to kill all the eucalyptus trees, leaving the field wide open for underbrush and an INCREASE in flame length.
2. Healthy trees, with underbrush removed, will PROTECT against rapid spread of fire.
3. Please, consider other proposals before adopting your EIS for UC, Berkeley, and EBRPD Projects. We need an approach that not only reduces fire hazards in the very short term but also looks to the long term impact. A 'tree-green enviroment' reduces temperature, increases moisture, and slows winds --- all qualities that will reduce the risk of fire.

Thank you for your consideration,

Joyce Cochran
San Francisco, CA

From: diana
To: EBH-EIS-FEMA-RIX
Date: Thursday, May 23, 2013 12:15:17 AM

I was aghast to learn about the plan to cut down so many wonderful trees in the name of fire safety and am adamantly opposed to the plan. Trees are homes to many critters and organisms, keep areas cool, trap moisture, and provide much beauty. I strongly urge you all to reconsider this plan.
Thank you,
Diana Gardener
Oakland, Ca

From: brayden billy-bob
To: EBH-EIS-FEMA-RIX
Subject: Cutting trees
Date: Wednesday, May 22, 2013 11:00:06 PM

I'm absolutely against cutting trees unless its non native trees like eucalyptus. We have already cleared Oakland of Oaks and Redwoods!! And its a damn shame!!

Brayden Serb , Oakland resident and bay area resident of 30 years.

Sent from Yahoo! Mail on Android

From: Mary Robbins Jones
To: EBH-EIS-FEMA-RIX
Subject: proposed East Bay Hills hazardous fire risk reduction projects
Date: Wednesday, May 22, 2013 10:38:11 PM

Dear Sirs:
This is probably one of the most outrageous proposals I have seen in a long time. Clear cutting all those trees will create a risk for mud slides, erosion, and that mulch will burn. And the spraying of Roundup or an equivalent herbicide over that much acreage constitutes an unreasonable hazard to all life in that area, animal and human, especially if the mulch or any of the surrounding vegetation that had been killed by the herbicide were to catch on fire. And the loss of habitat is inexcusable. I can think of at least 2 or 3 other ways to deal with any risk of fire. Fire breaks, as used by forestry firefighters would be a better way of reducing the fire hazards, without interfering with the normal ecosystem of that area. And I am sure that if you had consulted the Environmental scientists at UC Berkeley or Stanford or any number of other universities in the state, they would have be more than willing to work with you to come up with an ecologically sound plan to deal with any fire hazard. In fact, they probably still will. And I am sure that plenty of the students at those universities would be willing to volunteer time to help implement and maintain any agreed upon alterations in the ecosystem, rather than see the kind of destruction you are proposing. You should consult them before proceeding with this insanity.

Robbin Brown Jones
robbins@airmail.net
214 505-9254
1320 Norwood
Beaumont, TX 77706

From: Marilyn Marco
To: EBH-EIS-FEMA-RIX
Subject: Unacceptable plan for East Bay trees
Date: Wednesday, May 22, 2013 10:23:37 PM

To FEMA:

I am a long time East Bay resident, currently residing in the Oakland hills. The current plan for vegetation management in the Oakland hills is unacceptable. Please consider the following:

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the

projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

Thank you.

Marilyn Marco

From: Steve Peppercorn
To: EBH-EIS-FEMA-RIX
Subject: Oh My God!
Date: Wednesday, May 22, 2013 10:23:11 PM

To whom it may concern:
I now live in Oregon but was in the Bay area for many years. I am not sure how this is even a possibility but my guess is someone is making a lot of money. Please do not cut these trees. This is obviously being done for some kind of agenda and not to "protect" us. No one in their right mind would do this. This will not help anything (but someones' wallet) and will hurt the environment as well as the people there.

Sincerely,

Steve Pepeprcorn

From: Martin Naresh Gross
To: EBH-EIS-FEMA-RIX
Subject: Do Not Chop Down Trees Nor use Herbicide
Date: Wednesday, May 22, 2013 10:07:46 PM

Please do not chop down those 85,000 beautiful trees.
Please do not poison with toxic herbicides.

Sincerely,
Martin Gross
Piedmont, CA

From: Judith Schumacher-Jennings
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: Clearcutting Berkeley/Oakland Hills
Date: Wednesday, May 22, 2013 9:43:32 PM

Given that the FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects:

1. Does not meet its own stated goal of reducing flame lengths to 2 feet.

2. Does not adequately address Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity.

3. Does not adequately address the cost or the risks associated with the proposed herbicide use to eucalyptus trees or to the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

4 Does not adequately analyze reasonable alternatives for fire risk mitigation which are less costly, less environmentally damaging, and more effective.

5. Does not adequately analyze the impact on air quality.

6. Relies on a fire model that compares the risk of the current environment with the environment that will exist one day after 100,000+ trees are cut, without consideration of future risk or specifying any means for maintenance.

I ask that you retract the EIS and rework it to include these considerations.

Judith Schumacher-Jennings
sjmadrone@att.net
510-548-8254

From: Rose D
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: Proposed removal of trees in the Oakland and Berkeley, CA hills
Date: Wednesday, May 22, 2013 9:40:12 PM

Dear Sirs,

I am a horticulturist, my studies have included Arboriculture classes, and I know that removal of trees does not prevent forest fires. Dry brush causes fires, and removal of trees causes erosion. If your proposal is implemented, it will endanger all the homes that are currently below the hills, and also aggravate city heat-sinks.

Please use common sense in your decisions. These trees bring oxygen to our neighborhoods. Even though some of them are not native trees, they create a healthy, liveable environment.
Sincerely,

Rose Dallal
Bay Area resident

From: Johnny
To: EBH-EIS-FEMA-RIX
Subject: Oakland deforestation
Date: Wednesday, May 22, 2013 9:10:06 PM

Dear FEMA representative,

Please do not finance or support the destruction of thousands of healthy trees living in the Oakland Hills. Trees protect and support the fragile ecosystem by providing thousands of animals and insects natural habitats, as well as producing clean oxygen and absorbing toxins such as the carbons in our environment. Please consider the health and pollution fighting benefits that will be dramatically diminished if this plan to deforest the Oakland hills goes through. We need more trees surrounding our urban cities, not less. The wide-scale environmental impact of this draconian plan must be reexamined. Thank you for your consideration.

John Chirico
Sent from my iPad

From: Jason Snell
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: The FEMA Draft EIS for UC, Oakland, and EBRPD
Date: Wednesday, May 22, 2013 9:03:31 PM

Dear FEMA,

I'm writing you concerning the purposed deforestation of the Berkeley / Oakland hills. This is my home, and extremely important to me.

Please consider the following points:

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

>The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents

will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

Please take my comments into account when considering your decisions going forward.

Thanks,

Jason Snell
1862 Arch St #7
Berkeley CA 94709

From: Ashley SMITH
To: EBH-EIS-FEMA-RIX
Subject: NO TO EAST BAY PROJECT
Date: Wednesday, May 22, 2013 8:54:24 PM

Dear Sir/Madam,

Your project is nonsense, stop destroying nature for project that aren't necessary, it's time to wake up and see that we must stop!

Best regards,

Ashley Smith.

From: Sandi45@aol.com
To: EBH-EIS-FEMA-RIX
Subject: Claremont canyon EIS report
Date: Wednesday, May 22, 2013 8:52:24 PM

Dear Person,
I am writing to support the EIS report for the removal of Eucalyptus in Claremont Canyon and for funding to secure this removal. I lost my home in the 1991 fire and have experience of watching how dangerous these trees are, as they are highly flammable. The Claremont Conservancy has been restoring the native habit and this habit (Oaks, and Redwoods) provide a safer against fire, it is also very beautiful habit and native to our area. Our vegetation has grown back and we need to make sure we are more fire safe or another disaster could strike.

Sandra Brod
Dennis De Domenico
650 Alvarado Rd.
Berkeley, Ca 94705

From: Carol Hirth
To: EBH-EIS-FEMA-RIX
Subject: Draft EIS for UC, Oakland and EBRPD
Date: Wednesday, May 22, 2013 8:05:27 PM

The draft EIS is seriously flawed. It does not consider alternatives that would prevent erosion, destruction of the environment, dangerous run offs, the risks of herbicide use and other serious problems. It would create a dangerous clear cut, with all the incipient disasters for people, flora and fauna.

Thank you,
Carol Hirth
Berkeley, CA
Frequent user of the EBRParks

From: Linda Deaktor
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: clear cutting trees in the Berkeley/Oakland Hills
Date: Wednesday, May 22, 2013 7:57:42 PM

Might as well clear cut all of California with this proposal (The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management). What will be left when you've cut down 100,000 trees? Nothing that will be maintained and most probably will contribute to increased fire danger. It's time to rethink this proposal and rework it to include a model that analyses the expected end result vegetation and takes into consideration the reduction in carbon dioxide that is so critical to today's ever changing climate. God help us all if this plan is implemented.

Linda Deaktor, Berkeley resident

From: anne
To: EBH-EIS-FEMA-RIX
Cc: "HCN Network inquiries"@hillsconservationnetwork.org
Subject: another example of big government gone wrong
Date: Wednesday, May 22, 2013 7:57:07 PM

Who is responsible for the IDEA to cut down trees in the Oakland hills?

This is another example of disregard for our environment a waste of taxpayers money.

Since FEMA is so financially secure perhaps they can give back to the community by sharing their wealth with the fire department/ Police Department and the schools in Oakland..... you will not see any protests on spending your money in such a meaningful way.

Anne Wolff,Ph.D
64 Bayview Avenue
Larkspur, California 94939

From: Jane Sinton
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: The FEMA Draft EIS for UC, Oakland, and EBRPD
Date: Wednesday, May 22, 2013 7:02:22 PM

To whom it may concern:

I am writing to express my outrage at the proposed plan to remove over 100,000 trees in the East Bay hills, and the refusal of FEMA to consider alternative means.

The purpose of an EIS is not to present a means to an end, but to subject a proposed project to a process by which the *best means* is arrived at.

The scope and methods proposed in the FEMA Draft EIS for UC, Oakland, and EBRPD are *not* the only means to address fire danger in the East Bay hills. There has been no discussion of chosen means versus alternatives.

It seems to me it's the *purpose of the EIS* in the first place to give the plan time for scrutiny that could allow for better alternatives. That those alternatives would be dismissed out of hand is malfeasance on the part of FEMA.

Why does the EIS not consider alternatives suggested by qualified concerned parties, especially when those alternatives could save taxpayer money, avoid grave consequences, be less drastic in scope, and be more effective in the end? More to the point, why does FEMA appear to *have no interest* in considering alternatives?

I strenuously object to scope and methods of the project as it currently stands, and I deeply resent that a taxpayer-funded agency would turn a blind eye to alternatives with well-documented effectiveness.

Jane Sinton
6216 Estates Dr.
Oakland, CA 94611

From: Debra Singer
To: EBH-EIS-FEMA-RIX
Subject: FEMA draft EIS for UC, Oakland, and EBRPD
Date: Wednesday, May 22, 2013 6:57:49 PM

Why would you even consider mass clearcutting of trees and poisoning the environment with dangerous herbicides?

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is flawed and should be rejected for MANY reasons:

1. It does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

2. It does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

3. The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

4. Also, what about impacts on air quality? The Draft EIS does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

5. The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills relies on a fire model that is **fundamentally flawed** in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

6. The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

You should know better than to promote such an aggressive dangerous intervention in the environment.

-Debra Singer

From: Arthur Luehrmann
To: EBH-EIS-FEMA-RIX
Cc: Martha Luehrmann
Subject: FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects
Date: Thursday, May 23, 2013 1:11:30 PM

We strongly oppose the FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects. Removing 100,000 trees will drastically change our environment and ecosystem in unpredictable ways: landslides, with no deep roots to hold back the earth; grass fires on open land, such as the one that began the great Oakland fire; risks of proposed herbicide use.

Far from restoring the "natural" ecology of the hills (which were great redwood forests before humans arrived), the Draft EIS would turn the hills back only a century or two to the empty grazing grounds for sheep and cattle that they were. Are there also plans to restore the animals? If not, who will pay for future maintenance of a very unnatural environment? Nasty stuff will sprout up in the devastation.

It's time to scrap the Draft EIS and start over.

Arthur & Martha Luehrmann
1466 Grizzly Peak Blvd
Berkeley, CA 94708
510-548-7239

From: Chris Zydel
To: EBH-EIS-FEMA-RIX
Subject: Regarding East Bay Hills hazardous fire risk reduction project.
Date: Thursday, May 23, 2013 9:21:36 PM

To whom it may concern,

I understand the need for fire management in the East Bay, but clear-cutting trees will more likely increase the risk of wildfires than to reduce that risk. Clear-cutting would actually make ignition more likely for the following reasons:

distributing tons of dead wood onto bare ground, concentrating and enhancing wildfire risk in that region
eliminating shade and fog drip which moistens the forest floor
destroying the windbreak that is a barrier to wind driven fires typical of wildfires in California
expanding the oak-bay woodland being killed by Sudden Oak Death, thereby adding more dead wood
These projects will damage the environment by releasing hundreds of thousands of tons of carbon dioxide into the atmosphere from the destroyed trees, thereby contributing to climate change.

These projects will endanger the public by dousing our public lands with thousands of gallons of toxic herbicides.

Erosion is likely on steep slopes when the trees are destroyed and their roots are killed with herbicides.

Non-native vegetation such as broom, thistle, and hemlock are more likely occupants of the unshaded, bared ground than native vegetation which will not be planted by these projects.

Prescribed burns will pollute the air and contribute to the risk of wildfire, endangering lives and property.

These projects are an inappropriate use of the limited resources of the Federal Emergency Management Agency which are for the expressed purpose of restoring communities destroyed by disasters such as floods and other catastrophic events and preparing communities for anticipated catastrophic events. Most of the proposed projects in the East Bay are miles away from any residences.

The current Draft EIS is unacceptable as it will inflict enormous environmental damage, expose the public to thousands of gallons of toxic herbicide, destroy raptor habitats, destabilize steep slopes, and actually increase the risk of hazardous wildfires.

FEMA should retract this EIS and remove those portions of the EIS that call for clear-cutting tall trees. The EIS should instead support a far less destructive methodology that would focus on a "species-neutral" approach, focusing on eliminating ground fuels and the fire ladder, thinning where appropriate, and limbing up as needed to ensure minimal risk of crown fires. Killing more than 50,000 trees and poisoning them for up to 10 years will have disastrous effects on this beautiful and healthy ecosystem.

Please make the health and vitality of the local ecosystem your foremost priority before you consider this destructive plan!

Chris Zydel

Creative Juices Arts
chriszydel@creativejuicesarts.com
www.creativejuicesarts.com

"Be Creative. Feed Your Soul. Love Your Life."

From: CRISTINA CAMPBELL
To: EBH-EIS-FEMA-RIX
Subject: in support of Claremont Canyon + tree removal project
Date: Thursday, May 23, 2013 4:43:09 PM

Hello,

This is in strong support of the proposed project to remove non-native trees from the Claremont Canyon and beyond.

Thank you,

Cristina Campbell
Tim DeWolf
3108 Claremont Ave
Berkeley, CA 84705

From: Ellen Gierson
To: EBH-EIS-FEMA-RIX
Subject: EIS is Flawed! Stop the cutting of the trees in Oakland NOW!
Date: Thursday, May 23, 2013 10:11:02 AM

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

Ellen Gierson
$17 Opal Street
Oakland, CA 94609

From: Ian Irving
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: No clearcut No pesticides in East Bay hills!!!
Date: Thursday, May 23, 2013 12:37:58 PM

I am a resident of Oakland and stand firmly against the proposed vegetation management projects for UC, Oakland and EBRPD. Generally, the project strikes me as an almost unthinkably foolish approach to a real problem and I struggle to understand how this came to be an actual proposal. Specifically, my complaints against these projects are as follows:

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents

will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

Thank you for your consideration and I seriously hope there is time to save this terribly flawed project from going ahead as planned.

-Ian Irving

From: Jaclyn Tobia
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: DO NOT CLEAR CUT AND POISON THE OAKLAND AND BERKELEY HILLS
Date: Thursday, May 23, 2013 1:19:16 PM

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

>The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

SINCERELY,

JACLYN TOBIA

From: Jennie Van Heuit
To: EBH-EIS-FEMA-RIX
Subject: WEBSITE ERROR
Date: Thursday, May 23, 2013 3:39:18 PM

The link for "Cover, Abstract, Table of Contents, and List of Acronyms and Abbreviations" consistently fails with the following error message:

Duplicate headers received from server

The response from the server contained duplicate headers. This problem is generally the result of a misconfigured website or proxy. Only the website or proxy administrator can fix this issue.

Error 349 (net::ERR_RESPONSE_HEADERS_MULTIPLE_CONTENT_DISPOSITION): Multiple distinct Content-Disposition headers received. This is disallowed to protect against HTTP response splitting attacks.

--
Jennie Van Heuit
single mother to Charlie, 13 yrs
mother by choice, single by happenstance
SF Bay Area

From: Jennie Van Heuit
To: EBH-EIS-FEMA-RIX
Subject: Let"s not poison our country
Date: Thursday, May 23, 2013 3:22:43 PM

The clearcutting of trees in the East Bay Hills is drastic enough, but the proposal to drench the hills with RoundUp to prevent reseeding is misguided at its least.

The East Bay Hills don't need to be drenched in herbicide. This is insane. Does the government not have any other ideas for keeping the hills safe from fires?

Please, THINK HARDER.

Thanks,

Jennie Van Heuit
A citizen who votes... and thinks.

--
Jennie Van Heuit
single mother to Charlie, 13 yrs
mother by choice, single by happenstance
SF Bay Area

From: Jennifer Wharton
To: EBH-EIS-FEMA-RIX
Subject: Tree Clearing in Strawberry Canyon and Claremont
Date: Thursday, May 23, 2013 10:10:57 AM

As a long-time Berkeley resident I spent my entire childhood in these beautiful areas. Swimming, hiking, biking, day camp, exploring, breathing in the wonderful untamed nature of the hills in these canyons. To this day, just the scent of eucalyptus makes me happy.

Please do not allow this clear cutting project to occur. It is not only destructive and damaging to the beauty and health of the natural environment but the proposed solution to prevent any non-native plants from re- growing is to poison the hell out of the soil?

My mother is Cal alumni, my family have been homeowners in Berkeley/Oakland for 40+ years. My siblings and I are all alumni of BUSD and BHS. This is our beloved Berkeley. Live and let live. Do not destroy the trees!

FEMA, please stop this "Death of A Million" trees!

Thank you,

Jennifer Wharton

From: John Bongiovanni
To: EBH-EIS-FEMA-RIX
Subject: Environmental Impact Statement (EIS) for the removal of eucalyptus and other hazardous vegetation in East Bay Hills
Date: Thursday, May 23, 2013 3:00:28 PM

This is to register my support for releasing FEMA funds to the East Bay Regional Park District, the
University of California, and the City of Oakland, based on the recently completed EIS.

I am a resident of the affected area.
--

John Bongiovanni
17 Evergreen Lane
Berkeley, CA 94705

From: Judith Katz
To: EBH-EIS-FEMA-RIX
Subject: Clear Cutting Trees in Strawberry Canyon
Date: Thursday, May 23, 2013 1:28:40 PM

Dear Project Coordinators,
I am concerned about the use of pesticides in this project. Please find another way to do the work, other than using toxic chemicals.
Judith Katz

2425 channing way, #572
berkeley, ca 94704
mobile 650/303-4237

From: Judy Keene
To: EBH-EIS-FEMA-RIX
Subject: re: East Bay hills fire protection
Date: Thursday, May 23, 2013 10:06:02 PM

Having witnessed up close the disastrous fire 20 or so years ago, I urge you to help us with the “proposed and connected” action.
The area is greatly disturbed by non native, highly flammable brush and trees.
I don’t support building in wild lands, but this was
Done, and the area is far from “wild” in its vegetation. Any help would be very appreciated.
Sincerely, Judy Keene
Berkeley, Ca 94705
6 Plaza DR.

From: Karen Ackerman
To: EBH-EIS-FEMA-RIX
Subject: Remove Eucalyptus
Date: Thursday, May 23, 2013 11:40:06 AM

I agree with the sentiments expressed in the following letter posted online as a sample. Pleas approve the EIS.

Karen Ackerman
Berkeley, CA 94707

I strongly support the wildfire hazard mitigation projects for the East Bay Hills and feel that they have been studied long enough. I believe the EIS findings of improved fire safety and likely long-term improvements to the native landscape should move forward without delay. We Claremont Canyon residents know only too well that, when ignited, the eucalyptus canopy will spread wildfire dramatically during our windy fire season. With removal of invasive trees and yearly follow-up to discourage re-growth and weeds, native vegetation will thrive. Thank you for supporting this important work. Please approve the EIS as soon as possible.

From: Kathleen Maguire
To: EBH-EIS-FEMA-RIX
Subject: FEMA plan for the Oakland Hills
Date: Thursday, May 23, 2013 4:48:07 PM

I am writing to say that I absolutely do not support the The Fire Risk Reduction plan that FEMA is offering for Berkeley and Oakland.
I do not support the removal of trees "in case" of fire, and do not support the use of toxic herbicide to inhibit growth of non-native vegetation.
You all have enough money, brains and resources to work on another more bio-friendly answer to what you perceive as a problem. Why don't you pose it to the kids at UCB? They would give you something to work with.
Regards,
Kat Maguire
Berkeley resident

From: Larry LeBron
To: EBH-EIS-FEMA-RIX
Subject: Berkeley/Oakland Clearcutting
Date: Thursday, May 23, 2013 11:13:08 PM

Hello,

To whomever is receiving this, please stop this insanity.

Natural areas like this are an extremely precious resource, especially when they neighbor urban areas. This are is home to many native species, and the proposed plan is destructive and disrespectful.

Additionally, I am astonished to hear of plans to use herbicide on the clear cut areas. The deforestation alone is destructive enough. Please do not contaminate our land with toxic chemicals.

I cannot believe that such a plan has advanced to this point. Please see reason and stop it.

Thank you very much.

A concerned tax payer, voter and father,
Larry LeBron

From: lisa@oilandwaterskincare.com
To: EBH-EIS-FEMA-RIX
Subject: Stop the tree cutting and "round up"
Date: Thursday, May 23, 2013 9:43:42 AM

When I heard this week that the federal government would be funding the clear-cutting of 85,000 beautiful Berkeley and Oakland trees, including 22,000 in historic Strawberry and Claremont Canyon, my initial reaction was disbelief. I then wondered how the feds have money for this destructive project while Head Start and public housing programs are being cut due to the sequester.

I have been hiking the hills of Claremont Canyon for ten years, with friends, their kids and our dogs, and and am horrified at the proposal to pour 1400 gallons of herbicide on the currently pristine hills after clearing these trees out! The trees in Strawberry and Claremont Canyon have been there for decades and hardly constitute a "hazard." The real hazard is the use of the highly toxic herbicide "Roundup" to squelch the return of non-native vegetation.

Please do not allow this to happen. This would be a travesty with undeniable negative environmental impact. (The public seemed to be made aware of these hearings only hours before they actually took place, as we saw signs on the trails the day of the hearing.) Please please reconsider this action.

Lisa Tabbush

From: lucysmallsreed@comcast.net
To: EBH-EIS-FEMA-RIX
Subject: Please Approve EIS for East Bay Hills
Date: Thursday, May 23, 2013 3:00:56 PM

I urge swift approval of the EIS for the Berkeley-Oakland East Bay Hills project. This project will remove eucalyptus and other combustible vegetation that poses such a dangerous threat to homes, people, and animals in the surrounding area. The Oakland hills fire of 1991 that burned thousands of homes and killed dozens of residents was stark proof of the dangers of not controlling the vegetation in this area in a responsible and regular manner. This year we have had far below our normal rainfall, and the threat of fire will be very high this summer and fall--our dry season. It is urgent that FEMA act quickly to allow the project to move forward. It has been over 30 years since the terrible fire of 1991. We should not have to wait any longer for these sensible fire prevention efforts to begin.

Lucy Smallsreed
3029 Hillegass Avenue
Berkeley, CA 94705
lucysmallsreed@comcast.net

From: LVweiss
To: EBH-EIS-FEMA-RIX
Subject: Dear FEMA
Date: Thursday, May 23, 2013 3:08:29 PM

We recommend you do not let they UCBerkeley campus take down trees, put the equivalent of àgent orange on them with youngsters and elderly people around.

Recently there was a car fire and the fire Marshall looked at uc's daily growing wood chip mt., said to us that was as bad a fire hazard as he'd seen since the Oakland hills fire.We sent his quote to the papers.

Thanks, LVWeis

Sent from my iPad

From: Marnie Adamson
To: EBH-EIS-FEMA-RIX
Subject: Stop clear cutting
Date: Thursday, May 23, 2013 8:01:12 PM

To Whom It May Concern,
I think it is appalling that FEMA, UC Berkeley and the city of Oakland are considering clear cutting trees in the east bay hills to eradicate non native species for fire hazard purposes. Im highly concerned about the amount of toxic chemicals that will be dumped in order to prevent the non- native species to sprout again. This is more of a hazard than the fire issue that can be dealt with in more cost effective ways.
thank you,
Marnie Adamson

From: Matthew Szymankowski
To: EBH-EIS-FEMA-RIX
Subject: Save the Trees
Date: Thursday, May 23, 2013 10:16:55 AM

We can not let this happen!

It is an injustice to take down these trees under the guise of a fire hazard. If the Federal Government, State Government, or anyone else at all has a real plan for this land and a reason to take them down then the people of this community have the right to hear that.

Sincerely,

Matt Szymankowski

Oakland resident 10yrs

From: melvyn wright
To: EBH-EIS-FEMA-RIX
Subject: FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management
Date: Thursday, May 23, 2013 7:29:43 PM

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not address the effects on Greenhouse Gas emissions and carbon sequestration capacity. The analysis fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

The draft EIS also does not address the cost or the risks associated with the herbicide use that is being proposed. We ask that EIS fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

The draft EIS does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

The draft EIS is unacceptable because it does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality in the Bay area.

Thanks for your consideration,

Melvyn Wright

From: Miriam Ferris
To: EBH-EIS-FEMA-RIX
Subject: Fwd: Plan to cut all the trees in Strawberry and Claremont Canyons!
Date: Thursday, May 23, 2013 12:30:03 PM

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1) Winter rains will cause the pesticide residue to flow down the hill and into the bay. Pesticide residue that intermingles with rain will also affect all of the surrounding vegetation, including vegetable and flower gardens as well as soil quality.

2) Lack of trees will cause soil erosion, compromising the hills and potentially causing mud slides.

3) Lack of trees will completely change the local habitat in ways which cannot be foreseen. Animals and birds will all be affected. The fragile ecosystem will be compromised.

4) Minimally, each tree should be replaced with a tree from an indigenous species.

Message from sender:

I never send mass e-mails about stuff, we all get too much in our in boxes, but this is an outrage. Berkeleyites~! Get mad get out there. Stop this lousy plan.Pass it on. love Joyce

Published on *California Progress Report* (http://www.californiaprogressreport.com/site)

Home > Blogs > callen's blog > FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees

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FEMA Plans Clear-Cutting 85,000 Berkeley and Oakland Trees

Posted on 16 May 2013

By Randy Shaw

The Federal Emergency Management Agency (FEMA) is moving to chop down 22,000 trees in Berkeley's historic Strawberry and Claremont Canyons and over 60,000 more in Oakland. This destructive plan is rapidly moving forward with little publicity,

> and FEMA cleverly scheduled its three public meetings for mid and late May while UC Berkeley students were in finals or gone for the summer.

UC Berkeley has applied for the grant to destroy the bucolic Strawberry and Claremont Canyon areas, claiming that the trees pose a fire hazard. The school has no plans to replant, and instead will cover 20% of the area in wood chips two feet deep. And it will pour between 700 and 1400 gallons of herbicide to prevent re-sprouting, including the highly toxic herbicide, Roundup. People are mobilizing against this outrageous proposal, which UC Berkeley has done its best to keep secret.

Strawberry Canyon. Photo credit: Corin Royal Drummond

When I heard this week that the federal government would be funding the clear-cutting of 85,000 beautiful Berkeley and Oakland trees, including 22,000 in historic Strawberry and Claremont Canyon, my initial reaction was disbelief. I then wondered how the feds have money for this destructive project while Head Start and public housing programs are being cut due to the sequester.

The trees in Strawberry and Claremont Canyon have been there for decades and hardly constitute a "hazard." But pouring 1400 gallons of herbicide on the currently pristine hills will create a real hazard, and UC Berkeley even plans to use the highly toxic herbicide "Roundup" to squelch the return of non-native vegetation.

This is a true horror story that will happen absent public opposition. I know that many will find it hard to believe that this could occur in the pro-environment San Francisco Bay Area, but UC Berkeley may be counting on this attitude to get all the approvals they need before people find out the truth.

Please read "Death of a Million Trees," which provides all of the facts, figures and background about the Strawberry and Claremont Canyon proposed clear cutting as well as the tree destruction plans for the East Bay. The last public hearing will be held Saturday, May 18, 2013, 10 AM - 12 PM, at Claremont Middle School, 5750 College Avenue in Oakland.

The public has until June 17 to submit written comments on the project. You can do so through the East Bay Hills hazardous fire risk reduction project website, or via email.

There are countless destructive attacks on the environment that Bay Area activists cannot impact. But this is occurring in our own backyard, and activists must make sure that this cannot happen here.

Randy Shaw is a Bay Area attorney, author and activist, and the editor of the Beyond Chron online journal, where this article was originally published.

Tags

- Activism
- Disaster Mitigation
- Environment
- FEMA (Federal Emergency Management Agency)
- Shaw, Randy
- University of California
- Urban Planning

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Source URL: http://www.californiaprogressreport.com/site/fema-plans-clear-cutting-85000-berkeley-and-oakland-trees

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Joyce McBride
Private Instruction in Piano and Voice
Director, Conspiracy of Venus Women's Choral Ensemble
conspiracyofvenus.com
http://www.youtube.com/watch?v=AXiX3QiBvv8

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Miriam Ferris

Click on the Gan Israel logo for camp info

click on the dancing Chasid to visit our website

From: Sandra Barlow
To: EBH-EIS-FEMA-RIX
Subject: 80,000 trees elimination in the Berkeley and Oakland hills
Date: Thursday, May 23, 2013 12:35:46 PM

I want to add my voice to the well placed hue and cry of the extreme measure of cutting 80,000 trees from the Berk. and Oakland hills. As well as I understand the danger of fire in this area I think this is a radically reactionary way of handling that danger. The ecological impact would be huge, the science shows this. There are alternative ways of dealing with this problem such as maintaing the forest floor. Please do not go forward with this plan.

Thank you,

Sandra Barlow, Berkeley, CA
Sent from my iPad

From: SCSANMATEO@aol.com
To: EBH-EIS-FEMA-RIX
Subject: Destruction of trees
Date: Thursday, May 23, 2013 5:23:52 PM

DHS:

I honestly can't believe that destroying trees and spreading incredible amounts of pesticide (known as cancer risk and bee killer) is the answer to fire protection in Oakland/Berkeley. Please investigate ALL avenues to alleviate the problems and consider more appropriate solutions. We need trees to assist with cleaning our atmosphere and adding beauty to the land and habitat for birds and animals.

Please stop this horrible idea and arrive at a more appropriate solution.

Thank you.

Susan Churchill
San Mateo, CA 94403

From: Seth Kauppinen
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hazardous Fire Risk Reduction Plan.
Date: Thursday, May 23, 2013 5:26:56 PM

To whom it concerns,

I'm a resident of the Oakland hills, and a Ph.D. candidate in tropical biology at UC Berkeley. My work takes me to places where human impact on the natural world is crass, ugly and ill-conceived--a cruel decimation in pursuit of narrowly conceived human interests. For the most part, it's reassuring to come home to the East Bay, where a more-or-less functional bureaucracy acts in consultation with experts to balance immediate human needs or desires against long-term sustainability of the area's natural environment. So it was with a real sense of revulsion that I read of FEMA's proposed East Bay Hazardous Fire Risk Reduction Plan. This plan, which involves killing many thousands of trees and burying large stands of native chaparral under wood chips, and which would expose two watersheds to large volumes of herbicide, can only be described as idiotic. Fire is a threat that can be mitigated without wholesale destruction of all that is flammable, much as headaches can be cured without removal of the head. The University of California and the State have many experts who can help create a plan to achieve that. The current plan, in contrast, reads like the fantasy of a 14-year-old boy, rather than a fire ecologist or responsible urban planner. I was unaware of its existence until today, and have missed the opportunity to voice my opinion in the public meetings; but as a scientist and a human being, I cannot believe that such a vast, steaming pile of ignorance could percolate high enough in policy circles to be given real consideration.

I hope your agency finds its bearings soon, and reconsiders what would be a catastrophic action. Thanks for your time.

Best,
Seth

Seth Kauppinen
Department of Integrative Biology
1005 VLSB, MC 3140
University of California, Berkeley
Berkeley, CA 94720

Cell: 508.274.1974
skauppinen@berkeley.edu

"It is remarkable how long men will believe
in the bottomlessness of a pond without
taking the trouble to sound it."
-Henry Thoreau

From: SFsonshine@aol.com
To: EBH-EIS-FEMA-RIX
Subject: RE: Oakland Vegetation Manaement Plan
Date: Thursday, May 23, 2013 11:47:47 AM

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem. Please consider also the birds and animals that rely on these trees for a safe nesting place.
I also ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees. Please consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis. There is far more to think about here beyond just the trees. This plan needs to be scraped and reworked to be more considerate of our environment.

Thank you,

Desireé Mitchell
595 Arguello Blvd.
San Francisco, CA 94118

From: Stephanie Yount
To: EBH-EIS-FEMA-RIX
Subject: opposed to 22,000 cut
Date: Thursday, May 23, 2013 3:52:44 PM

Dear FEMA,

The proposal to cut 22,000 trees where I live gives me a stomach ache. I feel like we are way more creative than this!
Let's do something new & inspiring!

Thank you for your work,
Stephanie Yount

From: Susie Theroux
To: EBH-EIS-FEMA-RIX
Subject: Use of Roundup Herbicide
Date: Thursday, May 23, 2013 8:28:04 PM

Dear Sir or Madam,

I am writing with regards to the planned use of Roundup Herbicide in the fire-prevention project. There is currently a litany of evidence of it's dangers, and I hope you will reconsider. The hills of Berkeley are beautiful testaments to California wilderness, and no prevention of invasive species is worth the risk to wildlife and the people of Berkeley. I beg you to rethink the hazards of Roundup (some articles here).

Many thanks,

Susanna Theroux

--
Susanna Theroux
Postdoctoral Fellow
DOE Joint Genome Institute
2800 Mitchell Drive
Walnut Creek, CA 94598
stheroux@lbl.gov

From: sydney moss
To: EBH-EIS-FEMA-RIX
Subject: 100,000 trees
Date: Thursday, May 23, 2013 2:09:32 PM

Dear FEMA,

I agree with the following reasons to not cut 100,000 trees:

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because is does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

>The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

Sincerely,

Sydney Moss

From: Tom Walker
To: EBH-EIS-FEMA-RIX
Subject: FEMA Draft EIS for UC, Oakland and EBRPD
Date: Thursday, May 23, 2013 9:49:17 AM

>The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills does not meet its own stated goal of reducing flame lengths to 2 feet.

>The draft does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity.

>The draft does not adequately address the cost or the risks associated with the herbicide use that is being proposed and does not consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

>The draft does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed

>The draft does not adequately analyze the effects on air quality resulting from the proposed plan.

>The draft relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut but does not specify any means by which the project proponents will maintain the environment in this condition.

The draft should be withdrawn.

Tom Walker
San Francisco, CA

From: Lena
To: EBH-EIS-FEMA-RIX
Subject: Strawberry Canyon berkeley
Date: Saturday, May 25, 2013 2:13:02 PM

I am an oakland resident and I actively use the Strawberry Canyon trails for exercise and enjoyment. I was horrified to read the fate of the park and worried about the longterm impact of pesticide use.
We play an important role in protecting the environment in which we live. We are ultimately destroying ourselves if we continue to destroy the nature around us. We lose connection with nature we lose out.
Please considering making a public forum for which the truths about this project can come to light and the citizens can be represented. Given the opportunity I believe the community could work together to find a solution rather than a few big players make a decision that will effect many people and our wonderful park.
Thank you
Lena Zentgraf
434-466-7389

"Treat the earth well: it was not given to you by your parents, it was loaned to you by your children. We do not inherit the Earth from our ancestors, we borrow it from our children." --Ancient Indian Proverb

From: Nancy Jessup
To: EBH-EIS-FEMA-RIX
Subject: Draft EIS for UC, Oakland, and EBRPD land
Date: Saturday, May 25, 2013 1:56:16 PM

I'm writing to express my concerns about FEMA's draft EIS projects for the Berkeley/Oakland hills.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

The FEMA draft EIS for UC, Oakland, and EBRPD projects is unacceptable as currently written in that it does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills is unacceptable because it does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

Please retract the current EIS and consider all the implications before taking action.

Sincerely,
Nancy Jessup

From: T W
To: EBH-EIS-FEMA-RIX
Subject: comment on East Bay Hills clear-cutting
Date: Saturday, May 25, 2013 1:13:04 PM

I understand the concern about fires. However, I am aghast at the proposed solution to this problem. It's the equivalent of trying to drive a screw with a sledgehammer.

I would suggest you consult the Forest Service. They manage our forests, doing controlled burns and such, without clearing vast tracts of our natural heritage. I've visited the Bay area many times, and it would be tragic to despoil the landscape and environment that makes it such a lovely region to visit.

I strongly urge you to reject the sledgehammer solution. Do not clear-cut the area. Reducing a lovely wooded area to an ugly open area covered by 2' of wood chips is worse than the problem you are trying to solve. It would be hideous.

Terry Whitaker

From: Eric Ettlinger
To: EBH-EIS-FEMA-RIX
Subject: Comment on East Bay Hills fire prevention
Date: Saturday, May 25, 2013 10:05:59 AM

To Whom it May Concern:

As a resident of Berkeley, a biologist, and an expert on endangered species conservation, I'd like to offer my support for the plan to remove eucalyptus trees from the East Bay Hills. These trees pose a significant fire risk and they prevent the establishment of native vegetation that native animal species have evolved to inhabit. Short-term impacts in terms of aesthetics and hillslope erosion will be offset by the long-term benefits of reduced fire risk and native species conservation.

I also support the limited use of herbicides to control eucalyptus regrowth. As demonstrated by the Marin Municipal Water District in their efforts to control broom, judicial use of herbicides is sometimes the only effective means to control invasive vegetation.

One concern I have with the current plan is that too many trees may be cut in too short a time. Large scale "clearcutting" will almost certainly result in a public backlash that will hinder future efforts to control invasive vegetation. Tree removal should be implemented in a logical, phased approach, prioritizing areas of greatest fire risk to homes and areas with the greatest potential for the establishment of native vegetation. Short-term funding cycles should not be used to justify large-scale deforestation in a short time frame. A well-articulated and phased vegetation management plan that uses limited quantities of herbicides is the most likely path to winning public support for long term vegetation management in the East Bay Hills.

Sincerely,
Eric Ettlinger, MS
2331 7th St.
Berkeley, CA 94710

From: Stephen B.
To: EBH-EIS-FEMA-RIX
Subject: Strawberry-Claremont Canyons
Date: Saturday, May 25, 2013 8:28:38 AM

I am firmly opposed to the clear cutting proposal for the Strawberry and Claremont canyons. Further, the dumping of Monsanto herbicides should be beyond beyond the pale of discussion.

Fire mitigation is an appropriate effort. I know, I lived through the Oakland fire. Fire mitigation can be accomplished through less drastic and more responsible routine maintenance, which should be a local responsibility.

Creating wholly different forms of potential environmental and human catastrophes (ground and water poisoning, erosion and mudslides) in the process of addressing fire hazard is unacceptable.

As for the non-indigenous species argument, if you are going to go there, I expect you will soon be removing all humans from the Americas as well.

Life is changing. The planet does exist in a stasis, nor should it.

Stephen Bone

From: Dane Wenthur
To: EBH-EIS-FEMA-RIX
Subject: Stop the needless killing of trees in the East bay hills
Date: Friday, May 24, 2013 10:49:21 PM

Shame on you if this fire reduction plan goes through. I can see the need to cut a few trees and trim loose, dead branches...but 22,000 trees? Sprayed with herbicides like Roundup? Really? In a crowded place like Berkeley and Oakland, often times the East Bay hills are the only source of refuge for the common city dweller. It is a beautiful place that should not be altered so drastically. How hypocritical would this be if such a project were carried out in Berkeley, of all places? You don't have to be a tree-hugger, but a little common sense (you know, that thing that no public agency has anymore) would go a long way. The people will speak, and halt this project, I do believe.

Sincerely,
Concerned former Berkeley student

From: Jimmy Kilroy
To: EBH-EIS-FEMA-RIX
Subject: Support of EIS for East Bay hills
Date: Friday, May 24, 2013 9:27:00 PM

Jimmy Kilroy
2640 Stuart St
Berkeley Ca 94705

FEMA
P.O. Box72379
Oakland Ca 94612-8579

Re Support of EIS for East Bay hills

Dear FEMA,

As a nearby resident of Claremont Canyon, and a frequent hiker therein, I believe the EIS findings should go
forward. The removal of Eucalyptus trees and other fire prone trees and plants etc. is, I believe, an urgent
requirement.

Thanks for your support, hope you see fit to support the EIS as soon as possible.

Sincerely

Jimmy Kilroy

From: Christie Lee Blakley
To: EBH-EIS-FEMA-RIX
Subject: Comments and concerns re: East Bay Hills Hazardous Fire Risk Reduction
Date: Friday, May 24, 2013 7:23:49 PM

Hello,

I have lived in Berkeley and Oakland and enjoyed the hills and parks for the last 11 years. I have also been involved in numerous volunteer conservation efforts, and appreciate the importance of land management. Thus I do not reject the idea of doing some clearing, particularly of invasive species to help manage fire risk. However, the current plan seems to be excessively damaging, risk, and costly. Please consider:

1) I doubt there would be much opposition to clearing Eucalyptus and Acacia trees, however, Monterey Pines, which are also included in the plan are at least California native species, less invasive, and less prone to being a fire hazard than Eucalyptus and Acacias. Please consider cutting fewer trees and avoiding clearing the pines. The pines tend to have low moist undergrowth such as grass or huckleberries that pose less fire hazard than the dry leaves of Eucalyptus.

2) The need to keep some areas clear as fire breaks is understandable. Using herbicides to help with this is not necessary, expensive and damaging to the environment. Please do not use herbicides.

3) The biggest issue with plans to clear out trees and leave space for native plants is posed by the lack of any replanting in the plan. Replanting is vital to helping the habitat recover, reducing erosion, which will be a major problem with so much clearing. Replanting can also help guarantee that desirable species that will not pose too much of a fire threat will spread. If you want to have more open grassland that is wonderful, but unless native grasses are planted, it will just fill up with invasive species.

4) When reading the Executive summary of environmental consequences I was struck by the fact that all the negative impacts from the No Action Alternative are theoretical - they are the risks of greater potential environmental damage, but not sure to occur. However, most of the damages from the Proposed and Connected Actions would certainly occur if the plans were followed. The plan is unnecessarily extensive, and the use of herbicides will be damaging for no real good effect. The use of wood chips 24" deep also will deter native plant recovery.

Please consider modifying the plan to exclude the use of pesticides, limit the scope of cutting and include replanting, and it would be a plan that not only helps manage future fires, but helps preserve our local wildlife and recreation areas.

Thank you for your consideration,
Christie Blakley

From: Robert Grudin
To: EBH-EIS-FEMA-RIX
Subject: re: FEMA tree-cutting in Strawberry Canyon
Date: Friday, May 24, 2013 5:07:08 PM

To: EBH-EIS-FEMA-RIX@fema.dhs.gov
From: Robert Grudin, PhD, author of *American Vulgar*

Although I am not qualified to comment on the other areas covered in your Bay Area tree-cutting plan, I can say with some confidence that cutting trees in Strawberry Canyon, Berkeley, would serve little purpose in terms of safety and might, in fact, end up creating more of a fire hazard than that posed by the current flora. Prevailing winds run up the canyon to the eastern rim, which is sparsely settled at best. Trees, moreover, even in areas as small as Strawberry, produce their own moist ecosystem, and are less likely to burn than are the grasses and bushes that would son proliferate after a clearcut. Your initiative should be checked out by an unbiased expert before you destroy this precious natural resource.

From: DJ Schiffman
To: EBH-EIS-FEMA-RIX
Subject: De-forestation Berkeley & Oakland
Date: Friday, May 24, 2013 4:50:28 PM

I am writing to register extreme concern the ill-advised plan to cut down tens of thousands of healthy trees in Berkeley and Oakland in the name of fire mitigation.

1. Experts contend that fire danger would actually be *increased* with this plan, by eliminating shade and fog drip (which dampens the forest floor) and by destroying windbreak barriers.
2. The notion of clearing so called "non-native" species of trees is disingenuous. These non natives have become the de facto habitat for animal populations, for example great horned owls, which nest in the eucalyptus trees. If there were a real concern for native plant restoration, there would be a plan to replant native species in a measured way, so that the native animals have a chance to relocate and adapt.
3. Certainly the plan would not call for a massive application of herbicides, which will not just remove non-native plants, but will destroy insect, bird, and animal habitat and drain into the watershed.

I strongly urge you to reconsider this environmentally dangerous and highly destructive course of action and halt the removal of trees in Berkeley and Oakland.
Thank you for your consideration.
Respectfully,
D. Sepha Schiffman
1641 Tacoma Ave.
Berkeley, CA 94707
510-525-5842

From: jacquie proctor
To: EBH-EIS-FEMA-RIX
Cc: inquiries@hillsconservationnetwork.org
Subject: Draft EIS for UCB, Oakland, EBRPD is Significantly Flawed
Date: Friday, May 24, 2013 4:23:04 PM

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects in the hills does not meet its own stated goal of reducing flame lengths to 2 feet. The proposed treatments will result in an environment with flame lengths of between 14 feet and 69 feet, based on the same data set that was used to construct the EIS. This flame length is worse than what could be expected with the trees that exist currently. We ask that you retract the EIS and rework it to develop a proposal that actually fixes the problem.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects does not adequately address the effects of these projects on Greenhouse Gas emissions and the ongoing reduction in carbon sequestration capacity. The analysis not only uses an inappropriate baseline, but also fails to adequately consider the loss of ongoing carbon sequestration that will result from these projects. We ask that you retract the EIS and rework it to fully consider all the Greenhouse Gas implications of cutting down 100,000 tall trees.

The FEMA draft EIS for UC, Oakland, and EBRPD projects does not adequately address the cost or the risks associated with the herbicide use that is being proposed. We ask that you retract the EIS and rework it to fully consider all the implications of the expected herbicide use not only to kill eucalyptus trees, but also the hemlock, broom, thistle, and poison oak that will emerge as a result of the loss of shade canopy.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects does not adequately analyze reasonable alternatives proposed for fire risk mitigation. Far less costly, far less environmentally damaging, and far more effective methods have been proposed, but the EIS fails to consider them. The EIS needs to be retracted and reworked to analyze reasonable alternatives rather than simply dismissing them without any serious analysis.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects does not adequately analyze the effects on air quality resulting from the proposed plan. We ask that you retract the EIS and rework it to fully consider all the implications of the proposed projects on air quality.

The FEMA Draft EIS for UC, Oakland, and EBRPD vegetation management projects relies on a fire model that is fundamentally flawed in that it compares the risk of the current environment with the environment that will exist the day after 100,000+ trees are cut. This is a meaningless comparison, as the EIS does not specify any means by which the project proponents will maintain the environment in this condition. Because of this, shortly after the projects are completed the fire danger will begin to increase. We ask that you retract the EIS and rework it to include a fire model that analyses the expected end result vegetation rather than an essentially irrelevant state.

Thank you for your consideration,

Jacqueline Proctor

From: Laura Stevens
To: EBH-EIS-FEMA-RIX
Subject: NO MASSIVE TREE CUTTING IN BERKELEY, OAKLAND
Date: Friday, May 24, 2013 4:00:30 PM

The plan to remove thousands of trees from Strawberry and Claremont Canyons and other areas of Berkeley and Oakland, is an abomination! Intentionally devastating an area, denuding it, leaving behind hard scape and wood chips, not because a storm came through and killed everything but because what?? fire management is needed. Create something safe, not something dead. Laura Stevens Berkeley, CA

From: Brad Bunnin
To: EBH-EIS-FEMA-RIX
Subject: Strong support for East By Hills Hazardous Fire Risk Reduction
Date: Friday, May 24, 2013 3:26:04 PM

Dear FEMA:

As a long-time resident of the Berkeley Hills, I'm acutely aware of the danger of fire in the hills, made even more dangerous by the large stands of eucalyptus, acacia, and Monterey pines which are reaching the end of their life cycle. I strongly support the program described in the draft EIS for the removal of these trees. Many of my neighbors in the Park Hills Community agree, although I cannot and do not speak for them.

You will certainly hear from those opposed to the removal program. They will make a variety of claims about the value of the trees to be removed, although the varieties being considered for removal are introduced varieties that were not a part of the hills ecosystem and that have displaced far less hazardous native species. They will minimize the danger of a hills fire. They will assert that the use of herbicides is harmful.

I ask that you balance whatever truth there may be in their claims against the reality that a destructive fire will certainly occur in the hills and their canyons at some future time, and that the effects of such a fire will be costly in human lives, animal lives, vegetative cover, and property. I further ask you to adopt and apply the plan, or a close variant of it, as soon as possible.

Brad Bunnin

From: Susan Dixon, Ph. D.
To: EBH-EIS-FEMA-RIX
Subject: clear cutting & poisoning
Date: Friday, May 24, 2013 3:20:26 PM

Dear Fema,

What you are proposing to do in the East Bay Hills by clear cutting over 80,000 trees and dousing the land with pesticide is outrageous and unconscionable. How could anyone with half a brain consider such extreme measures? Sure it will remove some of the fire hazard, but so would reducing all buildings in San Francisco to 2 stories reduce the risk of an earthquake's disastrous consequences.

You will ruin most of the beauty of the area, destroy countless acres of wildlife habitat (birds, animals and reptiles), and turn the hillsides into wastelands. There are other measures that are better used to reduce wildfires that don't ruin the countryside.

And soaking the earth with pesticides like RoundUp? Are you crazy? This kills everything and makes the soil uninhabitable for a long, long time.

I live among trees in the El Cerrito hills and am well aware of the flammability of them. But they are an essential part of life here & I choose to live with the risk, even though I am deathly afraid of fires, because of all the advantages they pose. I mourned the loss of so many trees cut several years ago along Grizzly Peak, over to Skyline. That ruined the area.

What about soil erosion and hillside slippage?! What about how well large trees control ground and underground water? What about the quality of the air?

Have you even thought about these factors? How do explain all that away?

The good qualities and advantages the trees offer far outweigh the reduction in possibility of fires. It's like getting a radical double mastectomy to ward off the chance of breast cancer. Crazy!

PLEASE, PLEASE do not do this! I am sure many would agree with me. They just don't know what is being planned.

Sincerely,

Susan Dixon, Ph.D.

From: Gayle DeKellis
To: EBH-EIS-FEMA-RIX
Subject: Funds
Date: Friday, May 24, 2013 3:11:41 PM

Please approve the eis and release the Fu ds to clean up Claremont Canyon.
Gayle DeKellis

Sent from my iPad

From: Bob Brodersen
To: EBH-EIS-FEMA-RIX
Subject: East Bay Hills EIS
Date: Friday, May 24, 2013 2:51:42 PM

I fully support the draft EIS and hope the funding can released as soon as possible.
I believe that the removal of all Eucalytus should be done as soon as possible and the stumps treated to eliminate re-sprouting. I hope that the
thinning strategy of East Bay Parks is followed up with proper monitoring and maintenance.

Bob Brodersen
136 Evergreen Lane
Berkeley, CA 94705

From: Mary Peterson
To: EBH-EIS-FEMA-RIX
Subject: Fire Risk Reduction
Date: Friday, May 24, 2013 2:48:39 PM

Hello,

I am writing in regards to the planned clear cutting of trees in Strawberry & Claremont Canyon. I find it hard to believe that the "risk of fire" is of concern, when controlled burns are common practice elsewhere, and yet the imminent dangers of the use of herbicides & pesticides to prevent re-sprouting, and life giving growth are of no concern? Absolutely sickening. Literally.

~Mary, a concerned Bay Area citizen