Comments on Draft for Public Review 4/2/2012
Community Wildfire Protection Plan Alameda County

Comments received from:
1. Bob Sieben, Chair Fire Safety Committee North Hills Community Association (NHCA)
2. Peter Rauch
3. Carol Rice for Livermore Area Recreation and Parks District and Livermore Pleasanton Fire Department
4. Assistant Fire Chief John Swanson, East Bay Regional Park District
5. Fire Marshal Jay Swardenski, Fremont Fire Department
6. Norman LaForce, Chair East Bay Public Lands Committee San Francisco Bay Chapter Sierra Club
7. Tim Wallace, Conservancy President, Claremont Canyon Conservancy
8. Jean Robertson, East Bay Chapter California Native Plant Society
My review of the Alameda Co CWPP:

Under 2.1 increases, not increase in last paragraph before weather; and what are foehn winds in 2nd paragraph under same?

Under 2.7 Needs work. Provide educational materials of variable levels of detail addressing inside the home, external shell, ember hardening, non-ignition zone. Use DVD’s, web site, flyers. Separate materials for homeowners in existing homes.

Under 3.2 Ed/Collab/Planning (and elsewhere)
We need to facilitate sharing of information and resources. We need to develop educational materials for the homeowner for things they can and should do on their own property. This needs to be at increasing levels of complexity, beginning with the very simple, then expanding the detail in tiers, as they choose. There needs to be an “index”, so they can look up specific information—eg. Dealing with vegetation management where erosion is a problem, plan-specific issues such as rosemary or succulents etc. There is considerable information in the plan about construction details and structure improvements but little detail about many other issues.

Under 5.0 Under siding, add lower edges need to be sealed to prevent ignition from embers accumulating at the foundation.

Under fences, add importance of flashing where attaches to building and prevention of accum of debris under or next to fences.

Under 6.0 Under 6.2 under development of success stories I would add the 15 years of steadily improving veg management on the 14 steep acres of Hiller Highlands Phase V.

Under 6.2.1 Again, an outlined, indexed web site where one can access specific areas of interest or “blogs,” and references to additional materials.

Signature Page Shouldn’t it be OFD and Advisory Committee. Why City of Oakland here and Fire Departments elsewhere?

I have a major problem with Section 4.4
There is a preponderance with Oakland. Fine. But is there that little going on elsewhere in the County? How many times do we need to mention Garber Park? The listing under North Oakland Hills Association is misleading. Much of this expresses one person’s valid concerns about the Caldecott tunnel, which could be summed up succinctly as CalTrans properties along the 24 Caldecott corridor. Others are either under Oakland’s share of the FEMA grant (eg Skyline, Beaconsfield Canyon, Garber Park, and an area in the South of Oakland whose name eludes me) – See Leroy for details. The North Hills Community Association might be appropriate to list the items such as the Swainland Reservoir area. I (and Leroy) can go over this with you. I can see it reflects the NHCA meeting I had to miss in November. I think the wish list of all the stuff in the Caldecott Tunnel is out of balance and inappropriate to this plan. It commits us to an agenda I don’t think the County as a whole can accept.

--Bob Sieben
Chair, Fire Safety Committee North Hills Community Association (NHCA)
SUGGESTIONS FOR VEGETATION MANAGEMENT PRIORITIES ON CALTRANS 24 CORRIDOR PROPERTIES

These are truly rated in a sequence of priorities, first to last, taking all factors into consideration. Strategic location relative to expected spread of fires to homes, cost, accessibility, and maintenance of the site are given top consideration. #1 and #2 are particularly important considering that half the homes lost in 1991 were South of Highway 24, which the firestorm crossed.

1. 4th bore mitigation project: review and limit planned planting of 1500 trees. This is the most achievable, will reduce funds needed, and prevents huge uncorrectable mistakes. If maintained, it creates a strategic, key fire break to protect homes from Diablo wind driven fires spreading into vulnerable areas to the South.

2. South of Tunnel-Broadway and East of N Athletic Field: clear remaining large patches of broom extending from here up into the huge forest of eucalyptus. This is a concentrated, easily accessible, key strategic area to protect homes South of 24 from Diablo wind driven fire. Volunteers could handle this, followed up by goats, and debris removal would be easy. Would be nice if Caltrans could thin the eucalyptus and any pines along the upper edge. Ideally, this would extend up to the second bench road.

3. Hillside southwest of Hiller Drive, South and East of Kaiser School. Continue and maintain clearings in these areas. Though access to the steepest slopes is prohibitive, widening the breaks on the branch roads and maintaining them, especially the upper one, is strategically important, reasonably accessible and highly desirable. Goats would be ideal for broom seedling control in the cleared areas. It complements the clearing done by homeowners along Hiller Drive above. Volunteers could help in the flatter areas.

4. Clearing the lower 10 feet of the very steep slope North of Tunnel Rd from the Exhibition Center West to the stoplight. This involves traffic control and would have to be done by Caltrans with “elevator” equipment. It would complement the planned pedestrian path here. The cliff is quite rocky, so removing the Spanish broom, pines, and eucalyptus would make a good uphill firebreak. Not for volunteers. A relatively limited project where maintenance is not a big issue. Helps protect inaccessible areas above.

5. North of 24 between it and Caldecott Ln and Tunnel Rd West of the overpass. Although this is not close to homes, it is easy to access, not steep, and would remove ember producing fuels from the area. Many infected dying red eucalyptus, very woody Spanish and French broom. Volunteers and convict crews would be able to help in this area. Goats could be used in follow up maintenance. But not as strategic in location. Creates room for a staging area in major fire. A big project, especially considering the dying eucs to be removed.

6. Narrow strip between South edge of 24 and Tunnel Rd and Broadway on both sides of the overpass. I consider #2, the area above Tunnel Rd and Broadway, decidedly more strategic because it is above same roads, with this fire break on the wrong side. Also, closure of lanes on highway 24 would be required. Not a place for volunteers, but Caltrans could manage it well. A relatively small area.

7. Landscaping of #4 and #5 above areas. Oleander is a CalTrans favorite and could be used along roadsides for relatively firesafe, low maintenance, attractive landscaping. Generally, I would remove the bad stuff and let the good stuff grow. Native bunch grasses would be desirable. We have had good success with purple needle grass on our Southwest facing slope at Hiller Highlands V.

--Bob Sieben
Thanks Peter

Willy-nilly is better than not at all! I am not sure I will be able to answer all your questions but will certainly included them in with the printed comments so if there are others than can answer we might start the dialogue that could get some answers.

Fire station location is not something I can answer very definitively. My observation is that it is an evolutionary thing that relates as much to historic urban growth patterns, developments and funding, as to hazard location (response time). It appears more driven by structure fires than wildland fire response as that is what most of our local Fire Departments response calls (actually even a higher percentage are medical response). The most important take home from this graphic is how many different fire jurisdictions there are in the County to coordinate with and where their boundaries are. When it comes to wildfires, station location is only part of the story due to mutual aid and the fact that fire fighters and equipment can come from all over the nation.

I will have to give your comments on page 2.1 and 2.3 more thought. Lets see if we can collective come up with the language that better talks about the urban side (or UWI) like you suggest. I agree in our area this looking at it both ways is critical. The "urban ecosystem" should not be forgotten (and hopefully in other parts of the plan it will be better represented -- if not in the draft then at least in the revisions for the next version). Both the Urban and Wildland come into play, especially since in many parts of the highest fire hazards the communities have been in place for along time and are definitely contributing to the hazard.

Keep the ideas coming. Especially if you can target specific sentences that need to be revised like you did here.

Jean

Can you use some of these ideas around 2.1 and 2.3 too -- I know you have been struggling to help us figure out how to change the tone as we work together on this. Do Peter's ideas resonate with CNPS?

How about with Audubon?

Cheryl

On Apr 5, 2012, at 1:28 AM, Peter Rauch wrote:

Hi Cheryl,

I'm going to feed my personal comments to you willy-nilly, as I casually scan parts of the draft; if I try to get too organized about the review, I may never get to it. The risk is that I misunderstand/misinterpret some content by having not absorbed the entire context and content of the document first. So it goes ....

My comments are not those of any organization, but I gladly share them.

So, here's the first thought that occurred to me...

Page 1.8

In western Alameda County, why does the density of "local fire stations" seem to be disproportionate(ly low) in their distribution over Very High/High/Moderate Fire Severity Level zones compared to the "white" zones that are not assigned to any Level (does that mean that the white zones are even less severe than the other three ?) ?

I.e., there is a high density of local fire stations in the flatlands (the "white"-colored, low-risk? zone), and a low(er) density in the gray-colored (high-risk zones) hillsides.

Is there more to the story than simply where stations are located relative to severity level ? Am I misinterpreting the graphic (e.g., size/capacity of each station vis a vis its geographic location, amount/value of locally-situated resources to be protected, ...), or is there a deeper story here ?

Page 2.1

"Wildfires are a part of Alameda County,s natural ecosystem."

The presentation/discussion of "wildfire" on this page reads as if the life of an urban-side wildfire exists elsewhere --in the "wildland" part of the wildland/urban interface.

I suggest that this is a mis-directed of attention and responsibility. Suppose, for the moment, that there is no fuel on the wildland side of the w/u interface. Then, just how much will the urban side exposure to wildfire ?

And, to ask a complementary question, just how "wild" will any fire started on the urban side (again, assuming now that there is no fuel on the
wildland side) become during one of those Diablo-wind events?

And, further to this point, regardless of how much fuel might be present on the wildlands side of the W/U interface, would there be "wildfires" on the urban side if the urban side were properly managed (real property and its landscaped yards/streets) with respect to the availability of high-quality fuels on the urban side of the fence?

Is the use of the term "properly" (managed) too hot to handle by our urban property owners? I.e., what is the calculated cost of "properly" hardening –by removing the ("wild") burnability of (the excess fuel on) the urban side of the fence?

This perspective, on who fuels the "wildfire" that really matters to the citizen, is further challenged in my comment on Section 2.2.

Page 2.3

"The wildland urban interface (WUI) is defined as an area in which wildlands and communities are sufficiently close to each other to present a credible risk of fire spreading from one to the other."

First, that is a very selective and again mis-directed view of "wildland urban interface". The WUI exists regardless of whether fire comes into consideration or play.

Second, and as noted in my comment about Page 2.1, the urban side is mostly at risk of experiencing a "wildfire" because one's neighbors' home/yards and one's own yard are fuel loads in their own right; removing those fuel loads (by hardening structures, and by selective planting and pruning of yard/street vegetation) could simultaneously remove the "wildfire" risk/exposure.

The statement, "The WUI has gained increasing importance as more Americans build homes in rural settings adjacent to public lands" suggests another fault with the definition of WUI. The issue is not a wildland / urban interface in rural settings, but of building homes IN the wildlands. The situation along most of western Alameda County is not one of urbanization INSIDE a wildland, but the creation (whether by intent or ignorant bliss) of a wildfire-capable environment INSIDE the urban zone itself.

I dwell on these fundamental differences of perspective (as described above vis a vis WUI on pages 2.1 and 2.2) because I was hoping that the ACCWPP would direct peoples' attention to a problem of their own making, and with solutions in their own individual hands on their own personal private properties.

A costly thought? No doubt --no one has planned the avoidance of the circumstances in which people find their at-risk personal property; bad investments, costly outcomes.

So, folks try to ease the financial pains by misdirection --the problems must be because of the wildland side, at least in sufficient measure that we're going to use that as a rationale and excuse for not taking adequate responsibility to harden our personal urbanside properties.

More later, Cheryl. I'm only up to page 2.3

Peter

At 17:13 12/04/02, you wrote:

Diablo Fire Safe Council invites you to review the DRAFT Alameda County Community Wildfire Protection Plan

Written comments on the draft plan are being accepted from April 2nd through May 5th 2012.
Just to keep you in the loop. I'll draft a letter for the LPFD and LARPD.

Carol

-----Original Message-----
From: Mike Nicholson <mnicholson@larpd.dst.ca.us>
To: carollrice <carollrice@aol.com>
Sent: Thu, Apr 19, 2012 4:48 pm
Subject: Re: Alameda County Community Wildfire Protection Plan Draft Available for Review

Hi Carol:

That sounds great. If you could send a letter, that would be greatly appreciated. I will also look into sending a letter as well after I review the document. Thanks for keeping us in mind when stuff like this comes up.

Mike

-----Original Message-----
From: carollrice@aol.com
Date: Monday, April 16, 2012 10:50 PM
To: dburns@lpfire.org, Mike Nicholson <mnicholson@larpd.dst.ca.us>
Subject: Fwd: Alameda County Community Wildfire Protection Plan Draft Available for Review

Dear Dennis and Mike,

I noted in the Community Wildfire Protection Plan does not include any prescribed fires in Pleasanton or Livermore. This could be a document that supports the use of fire in the LARPD and locations that could enhance the Callipe butterfly.

I could offer a quick letter to the firesafe council. Do you think that's worthwhile?

Cheers!

Carol

-----Original Message-----
From: DFSCMiller <DFSCmiller@comcast.net>
To: DFSCMiller <DFSCmiller@comcast.net>
Sent: Mon, Apr 2, 2012 5:14 pm
Subject: Alameda County Community Wildfire Protection Plan Draft Available for Review

Diablo Fire Safe Council invites you to review the DRAFT Alameda County Community Wildfire Protection Plan

Written comments on the draft plan are being accepted from April 2nd through May 5th, 2012. Please circulate the attached pdf file of the plan among others who may be interested.

For more information and a recap of the planning process see the DFSC web site www.diablofiresafe.org/gla_co_CWPP.html or contact Cheryl Miller, Executive Coordinator Diablo Fire Safe Council at (510) 536-0143 email DFSCMiller@comcast.net.
Cheryl….I’ve included a few comments as “sticky notes” to the CWPP. As far as what EBRPD can do to “sustain the Plan”…….

East Bay Regional Park District: At a public meeting each Spring, review the next year’s proposed program of work for fuels management on park district lands. As part of the annual budget development process, during a Spring meeting of the EBRPD Board of Director’s Executive Committee, report the prior year’s fuels management accomplishments and present the proposed program of work for the next year. Work with cooperators to plan and conduct work in a way that improves fire protection and program efficiencies for both EBRPD and the cooperator.

John Swanson
Assistant Fire Chief | Fire Operations
East Bay Regional Park District
17930 Lake Chabot Road, Castro Valley, CA 94546
Tel:
jrswanson@ebparks.org | www.ebparks.org

Please consider the environment before you print
2.2 Wildland Urban Interface Risk & Hazard Assessments

The wildland urban interface (WUI) is defined as an area in which wildlands and communities are sufficiently close to each other to present a credible risk of fire spreading from one to the other. The WUI has gained increasing importance as more Americans build homes in rural settings adjacent to public lands.

The housing density and geography of Alameda County is such that most of the developed areas are bordered by WUI areas. Some locations are considered "Very High" and "High" Fire Hazard Severity Zones and are at significant risk for loss of life and property if a fire were to occur on a normal or extreme weather day.

For the purposes of this plan, the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity maps were used as a starting point to determine where significant fire hazards exist. Many local cities and fire districts have developed specific maps characterizing the risk in their areas, further refining the CAL FIRE maps. These local maps are included in the Appendix.

The California State Forester has identified communities in the WUI that are at a significant risk from wildfire. In accordance with the Healthy Forest Restoration Act, stakeholders are elected to extend the definition of WUI to include evaluation routes, staging areas and other important resources and infrastructure. This extended area is referred to as the "CWPP WUI" area on the Fire Hazard Severity map in the Appendix.

Existing risk and hazard assessments can be grouped into three categories addressing potential for fire to occur, what to protect and protection capabilities.

2.2.1. Potential for Fire to Occur

Factor 1 – Risk of Fire Occurrence

Fire History Locations
Alameda County has a history of fire; the "Tunnel Fire" in 1991 in the Oakland and Berkeley Hills above the Caldecott Tunnel being the most damaging. The Fire History in the East Bay shows many fires throughout the county over the past century. Three areas show clusters of fire:

1) East Bay Hills – Berkeley, Oakland, San Leandro;
2) East part of county along SB9;
3) Southeast in remote areas of the county.

Fire History Patterns
A look at the 15 fires in the vicinity of the Caldecott Tunnel from 1923 – 1991 shows a common pattern of ignitions during critical Diablo Wind conditions in the Fall, occurring every 10 – 20 years.

Cause of Fire
As a part of their fire management plan, East Bay Municipal Utilities District (EBMUD) looked at causative agents for fires on their watershed from 1980-1997. Many ignitions were
2.3 Values at Risk within the WUI

Millions of people are exposed to the destructive forces of wildfire by virtue of living, working, or visiting areas in the wildland-urban interface (WUI). In the Santa Monica Mountains, the risk of loss or harm to life and property is significant. The value of the assets at risk includes both tangible and intangible values, such as property, infrastructure, and human life. The values at risk can be measured in billions of dollars, as shown in the following table, with monetary values and non-monetary values included.

<table>
<thead>
<tr>
<th>Asset Category</th>
<th>Values at Risk (in billions of dollars)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential Properties</td>
<td>$X</td>
</tr>
<tr>
<td>Commercial Properties</td>
<td>$Y</td>
</tr>
<tr>
<td>Infrastructure</td>
<td>$Z</td>
</tr>
<tr>
<td>Natural Resources</td>
<td>$A</td>
</tr>
</tbody>
</table>

The values at risk are subject to high, very high, and extreme wildfire risk categories.

2.4 Strategies for Reducing Risk within the WUI

Identical to the San Diego County example. The local boards of the fire departments and the regional government are working to reduce the risk of wildfire by implementing strategies such as land use planning, vegetation management, and public education.
8. Recommendations to support land management on public and large private lands:
   - Integrating fire & resource management. A lot of collaborative planning work has been done in the region that should be incorporated. Balance protection of biological resources with fuel removal.
   - Share project implementation resources (contractors, equipment, specifications).
   - Share best management practices (BMP) and lessons learned.
   - Project & funding support.
   - Facilitate a process that permits volunteers to “adopt a park” on fuel management work, such as with Garber Park Stewards or Bear Monument Canyon Conservancy.
   - Work with local ranchers and public agencies who use specific grazing as a tool for fire management to encourage them to adjust range management plans and graze closer to roads and fence lines to reduce ignition potential early in the season.

9. Recommendations protecting homes, businesses, other facilities & essential infrastructure at risk:
   - Expand structure ignition reduction and defensible space activities to businesses and essential infrastructure.
   - Identify fuel reduction projects to protect transportation networks and utilities, such as watershed fuel reduction, roadside clearances, and power-line clearances. Power lines that do not follow roads may be a special concern, as it is difficult to get fire suppression equipment near the area if there is an ignition.

10. Recommendations to support local preparedness and Firefighting Capabilities:
    - Develop local evacuation plans and educate residents on preparedness. Alameda County Fire Department is working on evacuation plans for local areas.
    - Identify actions to maintain existing access/egress during Red Flag days by reducing resources of road right of ways on narrow roads throughout the hills.
    - Participate and enhance existing CERT/Neighborhood Watch programs.
    - Continued support fire department response improvements: mutual aid, wildland fire training, equipment etc.
3.3 Enhanced Suppression Capability and Emergency Preparedness Priorities

Each year wildfires reinforce the importance of local emergency preparedness and evacuation plans. The emergency service agencies (County Office of Emergency Services, County Sheriff, and local police and fire departments) of the cities and Alameda County are interconnected through mutual aid agreements and common training of the Incident Command System and National Incident Management System. To expand this preparedness to a local and neighborhood level, many jurisdictions offer Citizen Emergency Response Training (CERT) programs. Since these programs focus on multiple hazards and cover the entire county few offer wildfire preparedness or local evacuation in the event of wildfire. One priority recommendation focuses on assisting in the development of local evacuation plans. Another opportunity is to collaborate with updates to local hazard mitigation plan or general plan safety elements.

Another area of concern raised during the development of the plan related to the suppression difficulty of ignitions from powerlines when these utility poles do not follow roads. On July 23, 2005 a fire ignited from a downed power line in Tilden Park (after the ignition point of the historic 1923 Berkeley fire). While the firefighters were able to see the fire they had difficulty designating the area that was reached after a one-third mile through brush.¹ Had a service road been along the power lines the ignition would likely have been easily located.

**Priority Action: Evacuation Planning**

**Recommendation:** Collaborate with other organizations e.g. Red Cross, CERT, CONEX

**Neighborhood Watch** to assist community groups develop neighborhood evacuation plans.

**Implementation Actions:**
- Focus on community groups and block level.
- Identify essential supplies to maintain (Glo Parks)
- Identify special needs/needs at the block level
- Identify primary and secondary evacuation routes.
- Coordinate with CERT members
- Physical improvements to the roads as needed (bridges, gutters, sidewalks, vegetation clearance, signage etc.)
- Tie to general education of wildlife habitat interface issues, red flag warnings

**Local and Partners:** Collaborate with other groups that address evacuation training such as CERT and Red Cross, as well as outreach to home owner associations, fire departments, police departments.

**Time Frame:** Short to identify medium to long term to implement improvements.

**Funding Needed:** $ for maps and brochures, $5,000 for physical improvements.

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From: John Swanson <jrswanson@ebparks.org>
Subject: Fire Causes
Date: April 23, 2012 2:13:21 PM PDT
To: "Cheryl Miller (cmillerrla@comcast.net)" <cmillerrla@comcast.net>

Cheryl…..Perhaps this is a case of TMI…..but:
When we were updating our Fire Danger Operating Plan, we gathered the fire occurrence information we could find for the two county area. The initial analysis was completed using the local CAL FIRE fire history from 1996 through 2008 and EBRPD incident history for 2007, 2008, and early 2009. Over 1900 fires were analyzed. Fire history from CAL FIRE and EBRPD is combined to provide sufficient data to statistically analyze the causes of wildland fires throughout Alameda and Contra Costa Counties. The number of fires within the parks boundaries is limited.

Reported causes of fires in general for the two counties show the following:

<table>
<thead>
<tr>
<th>Cause Class</th>
<th>Number reported</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Undetermined or Miscellaneous</td>
<td>723</td>
<td>37</td>
</tr>
<tr>
<td>Equipment Use</td>
<td>515</td>
<td>27</td>
</tr>
<tr>
<td>Vehicle Special</td>
<td>332</td>
<td>17</td>
</tr>
<tr>
<td>Arson</td>
<td>117</td>
<td>6</td>
</tr>
<tr>
<td>Powerline Special</td>
<td>73</td>
<td>4</td>
</tr>
<tr>
<td>Debris Burning</td>
<td>35</td>
<td>2</td>
</tr>
<tr>
<td>Smoking</td>
<td>29</td>
<td>2</td>
</tr>
<tr>
<td>Playing with Fire</td>
<td>25</td>
<td>2</td>
</tr>
<tr>
<td>Railroad</td>
<td>24</td>
<td>1</td>
</tr>
<tr>
<td>Lightning</td>
<td>22</td>
<td>1</td>
</tr>
<tr>
<td>Campfires</td>
<td>19</td>
<td>1</td>
</tr>
<tr>
<td>Totals</td>
<td>1914</td>
<td>100</td>
</tr>
</tbody>
</table>

The chart above shows there are a lot of Undetermined or Miscellaneous cause fires. This is probably due to poor fire investigation, the fire start didn’t fall in the general categories, or there was simply insufficient evidence to determine a cause. Many in the Miscellaneous category are assists from CAL FIRE to local responsibility area agencies. CAL FIRE doesn’t report cause information for local responsibility fires.

The biggest determined cause is Equipment Use. This includes any type of construction or repair operations, mowing weeds/grass, or other activities that involve equipment that could accidentally start a fire.

Vehicle Fires escaping into the vegetation and combustible material in contact with vehicle exhaust systems are the most likely cause of the Vehicle Fires category.

Arson accounts for about 6% of the fires.

Powerline fires are significant during high wind/low humidity events. Contributing factors associated with powerlines are transformer ruptures and birds causing wire arcs.

So, though we had a greater number of fires in our database, the conclusions from our analysis coincide with those stated by EBMUD and included in the draft CWPP. Feel free to use any of this that you wish, or you may just want to state that “EBRPD did a similar analysis of 1900 fires over twelve years in the two county area and reached similar conclusions.”

(Interestingly, campfires and smoking accounted for just 3% of the fires; yet the first thing we do when the weather turns warm is ban smoking and campfires. Not a very effective prevention measure. We’re readjusting to restrict equipment use and cross-country vehicle traffic—44% OF FIRES— during very high fire danger. We have greater control over those activities, and the effort expended should yield better results.)
Cheryl,

Only 1 minor edit; Table 4.3 has one misspelled "Freemont" remaining. Out side of that, Chief said he'd sign it!

Thanks for all your work on this.

Jay

>>> DFSCMiller <DFSCmiller@comcast.net> 4/2/2012 5:13 PM >>>

Diablo Fire Safe Council invites you to review the

DRAFT

Alameda County Community Wildfire Protection Plan

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Please circulate the attached pdf file of the plan among others who may be interested.

For more information and a recap of the planning process see the DFSC web site www.diablofiresafe.org/ala_co_CWPP.html or contact Cheryl Miller, Executive Coordinator Diablo Fire Safe Council at (510) 536-0143 email DFSCMiller@comcast.net.
April 23, 2012

Cheryl Miller
Diablo Fire Safe Council
PO Box 18616,
Oakland CA 94610-0616.

DFSCMiller@comcast.net

Community Wildlife Protection Plan-Alameda County

Dear Ms Miller:

I represent the Sierra Club and make the following comments on behalf of the Sierra Club in regard to the Community Wildlife Protection Plan-Alameda County.

First, the Sierra Club expresses deep concern that except for two environmental organizations, California Native Plant Society and Claremont Conservancy, the environmental community was not notified or identified as a stakeholder. The Sierra Club has major concerns with attempts to control vegetation for the management of wildlife. The Sierra Club has worked over 20 years with the East Bay Regional Park District on developing an environmentally sound plan for management of fire risk. We believe that plan and the principles involved should be applied to the Alameda County plan that is proposed.

At the outset the Sierra Club wants to make it clear that it supports appropriate actions to protect against the risk of wild fire. The Sierra Club recognizes that the risk of
a wild fire and its impacts on people and buildings should be addressed. The critical issue
is whether the agencies taking actions to protect against a fire also take actions to
promote the protection and restoration of native habitat because native habitat has proven
to be less fire prone for the kind of wild fires like the 1991 Claremont fire and also
because in the long run it is more cost-effective to maintain.

We have the following comments on the plan.

First, we have the following recommended changes to the plan:

3.1 Selection of Recommended Priorities
Add to priority list

• Projects covered in an agency adopted environmental document. Note: Grants
  should not be processed for work that is not covered by required environmental
document(s) or for projects where required permits are not obtainable.
• Projects that will improve firefighting response, wildfire control capabilities, and
  residential evacuation plans and operational programs.
• Removal of invasive plants, of known high flammability listed in Cal-IPC California
  Invasive Plant Inventory. Publication 2006-02 or its updated publication.

3.2 Regionally Specific Educational Materials for Homeowner System
Add to priority list

• Vegetation Almanac for the East Bay Hills published by the Hills Emergency
  Forum.

4.1 Fuel Management
Specific Fuel treatment goals are addressed more fully in the CCC BMP and the Alameda
County supplement????? More work needed here! At best, use of the CCC BMP should
be temporary until an updated BMP is developed for Alameda County.

4.2 Top of page. Replace CCC BMP Practices Guidebook Zones to define areas where
fuel management is appropriate
1. Excessively flammable vegetation that would produce greater than 8’ flame lengths
   in wildland/urban interface areas within 200 feet of homes.
2. Excessively flammable vegetation that would produce greater than 8’ flame lengths
   within 200 feet of high-value or irreplaceable public facilities.
3. Excessively flammable vegetation that would exceed state or local defensible space
   codes within 30’ to 100’ of private residences.
4. Excessively flammable vegetation with ground fuel levels exceeding six tons per
   acre and fuel ladders in identified high-risk forests like Eucalyptus and Monterey
pine that are subject to torching and crown fires with potential high ember flight rates into residential areas.

5. Excessively flammable vegetation in areas critical to strategic fire fighting operations in the event of a wildfire.

6. Excessively flammable vegetation within 30’ of wildfire evacuation and firefighting access along paved roads and strategic firetrails.

7. Removal of invasive plants that will increase the flammability of adjacent natural plant communities or displace more fire safe and fire adapted native species.

4.2 Bottom of page. Add these two paragraphs with an appropriate heading

The emphasis of vegetation management actions detailed in this Plan centers on balancing three factors: wildfire risk reduction, resource management, and cost-effectiveness of projects over the lifetime of their implementation. Successful long-term wildfire risk reduction and resource management of the above zones must balance economic factors with the effectiveness of selected treatment methods; it is critical that selected cost-effective treatments be sustainable over the long-term.

A key premise of this Plan is that ecologically stable habitats in the above zones are ultimately more economically sustainable. In effect, managing vegetation to achieve plant and animal communities and habitats with high levels of bio-diversity but inherently low fire hazards is more effective over the long term than the occasional treatment and/or ongoing maintenance of high fire hazard vegetation. Therefore, the plan should promote the recovery, restoration, and enhancement of native habitat.

Second, prior to the adoption of this plan and its implementation an Environmental Impact Report must be prepared. The EIR needs to contain the following:

You must prepare a full EIR on this plan. It must be based on verifiable wildfire science, reliable resource protection/management science, and expert opinions in ways that will provide a sound foundation for recommended project work. We also urge that the EIR fully and carefully evaluate agency recommended projects as well as alternative fire and resource management projects to determine their effectiveness and environmental impacts. Solutions should be founded on peer reviewed science, and reliable long-term agency objectives, goals, and sound land management practices. Alternatives and recommendations for each grant should not be limited by project work that might look awful for the first 1 to 5 years, but will mature to eventually blend in with adjacent desired long-term vegetation.

The Plan and EIR must be based on factual wildfire history and not on revisionist “fire history” developed to support someone’s personal agenda for protecting planted “exotic” trees. Descriptive reports are available for fire behavior in grassland fires of the
early 1990s as well as fire behavior in planted forests and for local native vegetation
during the past 80-years. Reliable information about dramatic and frightening fire
behavior in hill residential areas is also available.

The plan and EIR must include reasonable predictions about how fire behavior will
change for project areas over the next 100-years as vegetation matures, becomes more
dense and flammable, and is effected by global warming. We suspect weather extremes
will have impacts on vegetation and potentially increase fire risks. The events of the 20th
Century suggest that it would not be unreasonable to forecast three Diablo Wind mega-
fires, seven minor Diablo Wind fires, possibly as many as 400 “normal” West or no-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.

We know that there have been four major freezes in the past century that have
damaged or even killed eucalyptus trees, and that many fires have killed pine trees. In
both cases, substantial seedling and sprout growth resulted to groves of increased fire
hazard. The best we can say at this point is that we do not always know how native-like
wildland plant communities will respond in detail to future fires, weather extremes, and
climate change. However, we prefer to limit the possibilities for changes to our natively
evolved regional flora and to not retain species of distant origins that will complicate the
process and remain as potential high-risk fire hazards.

The plan and EIR must be based on accurate and understandable fire behavior
attributes for local conditions in our hills during Diablo winds. Federal agencies will be
familiar with and want to use American fire behavior models that are often based on
vegetation from other areas of this country. As a result, the fire attributes that we have
seen for flame lengths, rates of spread, and spotting distances that were developed with
BEHAVE and FARSITE computer modeling in the 1995 HEF Plan and the 2010 Park
District Plan continue to be questioned, confusing and incomprehensible when
extrapolated for use in the East Bay, especially for eucalyptus. Unfortunately, there has
been little research into the important factors that affect ignition and fire behavior for our
unique and various plant communities, and they are thus 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 local communities, they are often
collapsed into generic categories and assigned fuel characteristics from other species and
areas. We would prefer models actually based on our local vegetation. However if that is
not currently possible, we at least urge you to incorporate and use the most recent Project
Vesta research from Australia to develop comparative attributes for fire behavior in blue
gum eucalyptus forests after applying local weather and topography inputs for the East
Bay Hills.
The Plan and EIR ensure that the EIS fully describes and requires appropriate mitigation for protected species based on the required biological opinions and recommendations of other Federal Agencies and includes the restoration of native habitat for areas where vegetation removal occurs. We also urge you to ensure that natural resource protection is given equal status with fire hazard reduction work when final projects are being developed. Baseline data layers for the study area should include the distribution of listed and important plant and animal species. It will be important to consider ecological communities along with the required focus on rare, threatened or endangered species. Ecological communities represent much greater ecosystem complexity than do individual species, and should be mapped with fire behavior attributes developed for each community.

**Shrub-dominated communities**

a) Wet North Coastal scrub (a.k.a. Northeast-facing scrub or North Coastal Franciscan scrub) - This community is a high priority for protection because it supports one of the highest levels of biodiversity of any shrub habitat type in the East Bay hills. The reasons for this level of diversity are complex but include structure, extent and food value (high percentage of fruit/nut bearing species).

b) Dry North Coastal scrub (a.k.a.) Southwest-facing scrub or Coyote Brush-Sagebrush scrub) - This community occurs commonly on southwest facing slopes in the study area. It is occasionally found without Coyote Brush, dominated by California Sagebrush such as on the flanks of Wildcat Peak. The fire hazard associated with this community is markedly higher than wet north coastal scrub largely due to the influence of aspect and species composition.

c) Manzanita-Chinquapin Chaparral – This “hard chaparral” is relatively uncommon in the study area and is known for the significant number of rare and protected plant species is supports, including the Alameda Manzanita (Arctostaphylos pallida). This community is fire adapted and can burn with great intensity, similar to related communities in southern California.

d) Emergent Coyote Brush scrub – This community most frequently occurs where grazing or fire have been removed from the landscape and represents general succession a grass-dominated to shrub-dominated community. It presents significant fire management challenges because of aspect, vegetation structure and the tendency to accumulate drier, flammable material as the stands mature in the absence of disturbance.
Grass-dominated communities

e) Serpentine grassland - Uncommon in the study area, this community is significant because of the high percentage of rare and protected endemic species it supports.

f) Predominantly native grassland (may contain red or Idaho Fescue, California Brome, Wild Rye, Purple Needlegrass, California Melic and California Oatgrass) – This community and elements of it occur sparingly in the study area. Isolated patches of this community that have a high percentage of native species are remnants of the coastal prairie vegetation that once dominated the east bay hills.

g) Emergent Coyote Brush grassland – This community is normally encountered where fire and grazing have been removed from grassland communities, most often non-native grasslands. This stage of development, to monocultural Coyote Brush, is a transition from earlier grazed grasslands. There is evidence, however, that it provides a nursery for emerging Live Oak-Bay Woodlands on north and east facing slopes.

Forest or Woodland communities

h) Live Oak-Bay Woodland - This community is a high priority for protection because it also supports one of, if not the highest levels of biodiversity of any forest or woodland habitat type in the East Bay hills. Importantly, this habitat type has a high resistance to wildland fire.

i) Redwood Forest – This community is encountered only in Redwood Regional Park and areas immediately adjacent and is widely regarded as the most spectacular forest type in the East Bay.

j) Willow-Riparian Forest - This and related communities are high priorities for protection because of their biological significance and low fire hazard potential. They are important as wildlife corridors. The flowing water provides habitat for a number of listed and candidate species including Steelhead Rainbow Trout, Red-legged Frog and Western Pond Turtle.

Rare Plant Associations

k) Prunus woodlands – This rare native plum (Prunus emarginata) occurs in small dense stands in a few locations within the study area. One well-known stand occurs within the Caldecott Corridor.
l) Woodland and brushland habitats containing Western leatherwood – Western leatherwood (Dirca occidentalis) is one of the best known of the rarer shrubs in the East Bay.

**Non-native Communities**

m) Eucalyptus Forest – This introduced forest community is highly controversial because of the extreme fire behavior it can generate and because the number of native species have adapted to it a variety of circumstances

n) Monterey/Bishop Pine Forests – This transplanted plant community occurs in dense stands and as individual specimens in several areas within the study area.

o) Predominantly non-native grasslands – These are the most common grassland communities in the East Bay. They are most often managed through livestock grazing. Non-native grasslands have largely replaced native grasslands in the East Bay, although native species can often be found within this community-type. Wildland fires occur in these grasslands more than other plant communities because of the relative ease of ignition, yet they are generally less difficult to suppress than fires occurring in heavier fuels. Many native vertebrate and invertebrate species have adapted to this community.

p) Broom - (French, Scotch, Spanish and Canary Island Broom). These introduced species escaped from freeway plantings and have been aggressively invading the native plant communities for decades. They invade and establish monocultures with exceptionally low biodiversity and high fire hazard potential. It is important to map their occurrence to facilitate removal, and to avoid spreading them through fire hazard reduction activities.

**Other Landscape Features**

r) Springs and Seeps - These upland wetlands often represent the only sources of water during the East Bay “Mediterranean” summer. As a result they are generally indicators of high diversity, frequently contain listed species and are highly regulated.
s) Landslides – These common features of the east bay hills are an important element of biodiversity because of the “disturbance” they provide to the environment. Their occurrence in the study area is particularly significant when they occur in proximity to urban development. Vegetation management in these areas must take into account the potential activation of landslides that may threaten dwellings. These areas may need management after slides occur due to changes of vegetation types and species, which are often weedy or fire-prone.

t) Ecotones – These are biologically significant areas that often support increased biodiversity as two or more communities intersect. Management activities in ecotones, including wildlife corridors, can have significant impacts on species movements and subsequent genetic viability. Ecotones occur throughout the study area.

u) Disturbed Areas (trails, roads, developed use areas, etc.) - These highly managed features that are significant because of they can facilitate invasion by non-native weedy and woody species, contribute to sediment and pathogen transport and are a frequent site of wildland fire ignition. Trails and fire roads are also important because they facilitate human access through the landscape for maintenance, firefighting, recreation and related activities. Grazed areas help to prevent the spread of wildland fire. Wildlife movements can be both facilitated and impeded in these areas depending on the circumstances.

v) Landscaped areas (homes, golf courses, etc) - These are also highly management areas that can serve both as fuel breaks (i.e. golf courses and appropriately landscaped homes) or important ignition sources for urban wildland fires. Residential communities next to the regional parks are one of the main drivers for fuel break development. It is also important to note that proper fire hazard management (i.e. fire hardening of structures, fire safe residential landscaping, etc.) in these areas is a critical element in protecting fire spread from these residential areas. As with disturbed areas, developed areas can both facilitate and impede wildlife movements depending on circumstances.

The Plan and EIR must fully describe and evaluate alternative fire safety and ongoing management actions for hazardous eucalyptus and pine forests for the purpose of determining project effectiveness and environmental impacts for managing these high-risk species. A small but vocal group has been opposing thinning or conversion of eucalyptus and pine trees even when they are in unnaturally dense and flammable groves.
It may be impossible to arrive at a complete public consensus, but we urge that the recommendations in the EIS are based on peer-reviewed science by qualified experts. These introduced forest communities are highly controversial because of the extreme fire behavior that can be generated, because residents value tall trees and forests, and because of the number of native species that have adapted to them.

We offer the following suggestions for consideration.

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 public woodlands, and to allow these areas to convert to native-like vegetation that will require little ongoing maintenance other than exotic weed control.

c) Groves that are thinned to retain mature eucalyptus trees should keep 30 to 50 trees per acre with selected native shrubs and trees preserved, and ground fuel maintained by hand at less than two tons per acre. 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 retained native-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.

1) 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.

2) 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.

3) When there is sufficient native grass cover and/or seedbank in areas to allow for establishment of good quality grasslands, these areas can be carefully restored and managed by grazing or mowing to prevent re-succesion of shrublands. However, in the absence of a good quality grass seedbank, weeds will dominate the resulting “grassland” unless over-seeded with desirable replacement grassland species occurs soon after project disturbance.

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 an agencies 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.

The Plan and EIR must address controversial stump treatment chemical issues in light of the experiences and capabilities of our local agencies. Considerable flexibility for choosing treatments must be allowed based on project size, agency capability, and the existence of successful, established integrated pest management policies or programs. We are not currently opposed to the careful use of Garlon as a stump treatment on eucalyptus or even broom when applied by a licensed applicator that will prevent spread into adjacent soils or waters. However, we also urge and continue to support alternative solutions that do not rely on chemicals.
We are very concerned about any project disturbances that will increase weed invasions and fire risks, and recommend that this issue be given full review and consideration for all recommended projects in the EIR. We also urge you to ensure that the EIR will address ongoing concerns about goat grazing in project areas will that increase flammable weed invasion and damage native flora. We know that goats seem like a cheap solution at $700 per acre, but they are non-selective in their browsing and interfere with restoration of sustainable native habitat. We also do not believe that they are currently cost effective given the amount of mowing and weed eating that is now being done by agency employees or by small contractors working at reasonable cost for agencies or homeowners. On public lands, we would prefer to see more people with appropriate training and skills working on plant conversions and habitat restoration instead of paying for goats.

You should review and use as a starting point the East Bay Regional Park District's vegetation management plan. This document provides excellent factual information and approaches for dealing with fire risk.

Fourth, the plan must focus as a key priority on the restoration, recovery, and enhancement of native habitat. Native habitat is overall less of a fire risk. Focusing on such restoration work also greatly aids in keeping exotics and non-native vegetation which is far more dangerous for fire risk from taking over areas that are to be managed. The cost of maintenance is also lower over the long run.

Finally, you must provide for funding for on-going maintenance. Once vegetation removal is done, the agency involved usually does not have and does not budget for long term (We mean Looong term like 50 years) maintenance of the areas in question. Without long term maintenance, your plan is for naught because exotic invasive species that are more fire dangerous will take over.

Sincerely yours,

Norman La Force, Chair
East Bay Public Lands Committee
Dear Cheryl and the Diablo Firesafe Council,

It’s amazing that this is the only wildfire protection plan that has ever been developed for all of Alameda County. It contains sound advice for the residents of Claremont Canyon and the region. The Claremont Canyon Conservancy is a catalyst for the long-term protection and restoration of the Claremont Canyon’s natural environment and an advocate for comprehensive fire safety along its wildland/urban interface.

We congratulate the DFSC for taking the lead in producing this significant document, and recommend the following changes to the draft Action Plan

3.1 Selection of Recommended Priorities
Add to priority list
- Projects covered in an agency adopted environmental document. Note: Grants should not be processed for work that is not covered by required environmental document(s) or for projects where required permits are not obtainable.
- Projects that will improve firefighting response, wildfire control capabilities, and residential evacuation plans.
- Removal of invasive plants, of known high flammability listed in Cal-IPC California Invasive Plant Inventory. Publication 2006-02 or its updated publication. Pampas grass, French broom, Blue Gum Eucalyptus suckers and seedlings, Euphorbia, etc.

3.2 Regionally Specific Educational Materials for Homeowner System
Add to priority list
- Vegetation Almanac for the East Bay Hills published by the Hills Emergency Forum.

4.1 Fuel Management
Specific Fuel treatment goals are addressed more fully in the CCC BMP. Note: Diablo Fire Safe Council will seek funding to prepare an Alameda County BMP supplement to eventually replace the CCC BMP.

4.2 Top of page. Replace CCC BMP Practices Guidebook Zones to define areas where fuel management is appropriate
1. Excessively flammable vegetation that would produce greater than 8’ flame lengths in wildland/urban interface areas within 200 feet of homes.
2. Excessively flammable vegetation that would produce greater than 8’ flame lengths within 200 feet of high-value or irreplaceable public facilities.
3. Excessively flammable vegetation that would exceed state or local defensible space codes within 30’ to 100’ of private residences.
4. Excessively flammable vegetation with Litter layer that exceeds one or both of the following:
   - Ground fuel up to 6 inches deep with occasional jackpots of fine material up to 3” diameter.
• Ground fuel levels above two tons per acre with ribbon bark and understory fuel ladders in identified high-risk forests or residential groves like Eucalyptus and Monterey pine that are subject to torching and crown fires with potential high ember flight rates into residential areas.

5. Excessively flammable vegetation in areas critical to strategic fire fighting operations in the event of a wildfire.

6. Excessively flammable vegetation within 30’ of wildfire evacuation and firefighting access along paved roads and strategic firetrails.

7. Removal of invasive plants that will increase the flammability of adjacent natural plant communities or displace more fire safe and fire adapted native species.

4.2 Bottom of page. Add these two paragraphs with an appropriate heading

The emphasis of vegetation management actions detailed in this Plan centers on balancing three factors: wildfire risk reduction, resource management, and cost-effectiveness of projects over the lifetime of their implementation. Successful long-term wildfire risk reduction and resource management of the above zones must balance economic factors with the effectiveness of selected treatment methods; it is critical that selected cost-effective treatments be sustainable over the long-term.

A key premise of this Plan is that ecologically stable habitats in the above zones are ultimately more economically sustainable. In effect, managing vegetation to achieve plant and animal communities and habitats with high levels of bio-diversity but inherently low fire hazards is more effective over the long term than the occasional treatment and/or ongoing maintenance of high fire hazard vegetation.

Insert between 5 and 6 on Section 2 number 2.9

6. Homeowner Risk Reduction Behaviors (add as new section)

• Creating a minimum 30-foot defensible space around your home
• Planting low-growing, fire resistant plants around your home
• Putting a fire resistant roof on your home
• Putting fire resistant undersides to any decks and balconies on your home
• Removing any dead branches from your home’s roof and around the chimney
• Making sure that your home is easily identifiable and accessibly from a main road
• Making sure that all the trees on or near your property are away from structures
• Making sure that all the trees on or near your property are away from utility lines
• Working with neighbors to clear common areas and prune areas of heavy vegetation
• Stacking firewood and scrap wood piles at least 30 feet from any structure
• Contacting your local fire department to get a personal fire safety inspection at your home and property.

Source: Firesafe Council of California website: www.firesafecouncil.org

6. 7. Recommendations to support improving structure survivability (continue)

Thank you for the opportunity to comment on the draft Plan,

L. Tim Wallace, Conservancy President
Hi Cheryl,

Sorry this is late. Lots of back and forth and changing of thinking and tactics. This version of comments is simplified. I couldn't create a statement 'from CNPS' for the appendix, as it would have required lots more time in order to be approved by the board of directors; they would have needed plenty of time to read the full edited draft CWPP, then any statement 'by CNPS' and meet to discuss/approve/edit....etc., so in lieu of that I just did my best to work in the main themes and particulars that would have been covered in an appendix piece, where I thought it made the most sense in the various sections of the CWPP. Not as much depth as an appendix statement could be, but I think it's fine this way.

Thank you,
--Jean

Suggested specific changes are in *italics*. Other related comments/ editorial suggestions are **bolded**.

Exec. Summary, pg. 1

(item) 1. Identifying and prioritizing fuel reduction/vegetation management opportunities across the county.

Section 1 pg. 1.4 end of first paragraph, under: Vegetation and Wildlife Habitat

"...Info about vegetation and habitat is included..........part of the Contra Costa Co, CWPP), and in the Vegetation Management Almanac for the East Bay Hills, as well as other resource docs......

Section 1 pg. 1.5

"City of Oakland owns and manages...."

Knowland Park and Oakland Zoo (500 acres)  (**This is info that CNPS has on Knowland Park, including the acreage of the zoo**)

Section 2.1 Fire Environment

(second sentence)  *Our summer dry climate*, the rugged, wind conducive topography, and *abundant vegetation* set the *stage* for periodic burns.

(seems like a great deal of the vegetation in the WUI on the urban side is not native, yet that vegetation is a big factor in Urban side wildfires related to vegetative fuels, therefore the suggested above changes)

Section 2.1 (subheading): Vegetation

(suggest a change to:)

*Structures and Vegetation*

*With more and more homes built in high fire hazard zones, and changes to the native fire cycle, we now have many highly flammable structures nestled amongst much overgrown and flammable vegetation in some areas. This* massive fuel load in area mountains and hills makes......In addition, non-native *and invasive weedy vegetation has replaced the more fire resistant and stable native species in many places, adding to the threat.*

Section 2 pg. 2.6 Critical Wildlife Habitat

".....other federally listed species are identified in "Best Management Practices......... *See also the Vegetation Management Almanac for the East Bay Hills*

(also, under the section:) Local watersheds, creeks and riparian areas:

"...for removal of riparian vegetation." *Also, replanting/revegetation may be required in some areas where vegetation has been removed.*  (**cheryl, you may have added this already?)
Section 2 pg. 2.8
5. **Recommendations to further support defensible space programs:**

*(suggested bullet point):*
showcase successful treatments of properties where habitat values, aesthetics and fuel reduction goals have been met, with on-line photo gallery.

same pg. item 7
"Recommendations to support appropriate new development and construction....."

*(suggestion for another bullet point)*
planning commissions should not approve *(or be much more selective in their approval of?)* new construction in very high fire hazard zones

*(here's another way to say that):*
encourage local planning commissions to be more selective about where permits are issued for new construction in the WUI relative to what we now know about fire behavior in Alameda Co. and what we can guess about increased hazards to come with more extremes in wind conditions, drought, and probability of increased fire events and increased severity of fire events relative to climate changes due to global warming.

(Cheryl, I don't know what you can really say here without anyone taking umbrage, but I think it's a valid point--these high and very high hazard fire zones in wild land places really probably should never be approved at the planning commission level. Houses that are already built are one thing, but there ought to be more restrictions on new construction in these areas. Perhaps you can think of a more diplomatic way to say it--or maybe it's fine to just say it this way?)

Section 2 pg. 2.10
8. "Recommendations to support...."

*(first item)* Integrating fire with sound resource and vegetation management that protects and improves native habitat values--a lot of collaborative...."*

*(fifth item)* Facilitate a process that permits volunteers to 'adopt-a-park' for fuel management work including revegetation of desirable species, such as with......

*(add 7th item)* Include botanical and biological experts in planning and oversight of projects to maximize effectiveness while minimizing negative impacts.

4.1 "Fuel Management, *ideally a subset of sound vegetation and ecosystem management, is the practice of..."* *(jump to end of first paragraph..) ...to achieve fuel management and habitat improvement goals.*

" Specific fuel management treatment goals and methods are addressed more fully in the *Vegetation Management Almanac for the East Bay Hills* and in the Best Management Practices...."

4.2 *(see Jerry Kent's comments here)*

Section 4 pg. 4.4 *(Insert below North Oakland Hills Association):*

*(lead and partners not identified)* Develop as a reference tool a data base and photo gallery of Alameda Co. fuels/vegetation management projects including successes and failures, with info on follow-up maintenance, etc. unfunded

*(lead and partners not identified)* create up to date vegetation mapping for the urban side of the WUI. unfunded

*(Cheryl, I leave it to you to decide if it makes sense to include the above suggestions, in terms of likelihood of ever being funded, ? or how it fits into this section. I think they are worthy ideas, but I'm not attached to them appearing here)*

4.6 *(add bullet point):*
widely disseminate information on appropriate timing of fuels treatment activities for best success relative to reducing the reproductive viability and survivability of invasive non-native species, while doing least harm to/improving native habitat
values.

(delete bullet point about CNPS to include a section in the appendix....)

(add bullet point:) "See Green Paper prepared by........."  
(Cheryl, can the green Paper be on the DFSC website as part of the reference section, so that people can find link to it, to read it?)  
(Also, maybe there is a better place to specifically mention the Green Paper. It fits in this section, however, it's not actually a priority action in and of itself, though it can inform actions)

Section 5 pg. 5.4  
2. "limit the time the structure is exposed to........vegetation management.  First 30 feet from the house is the most important zone for fuels management.  (see blah blah reference.)

Section 5 pg. 5.6  
(decks): closing off the space under decks should be done with solid material, not lattice, (to reduce the hazard of embers coming in) ??

6.2.3 Evaluating Fuel Reduction  
"Monitoring hazardous fuels reduction projects on private and public lands will assist stakeholders in understanding the extent to which risk reduction and native habitat preservation goals are being met.  Also, monitoring these projects allows stakeholders to better understand the extent of resources needed to accomplish and maintain the goals, as well as to help in identifying future priorities."

END!