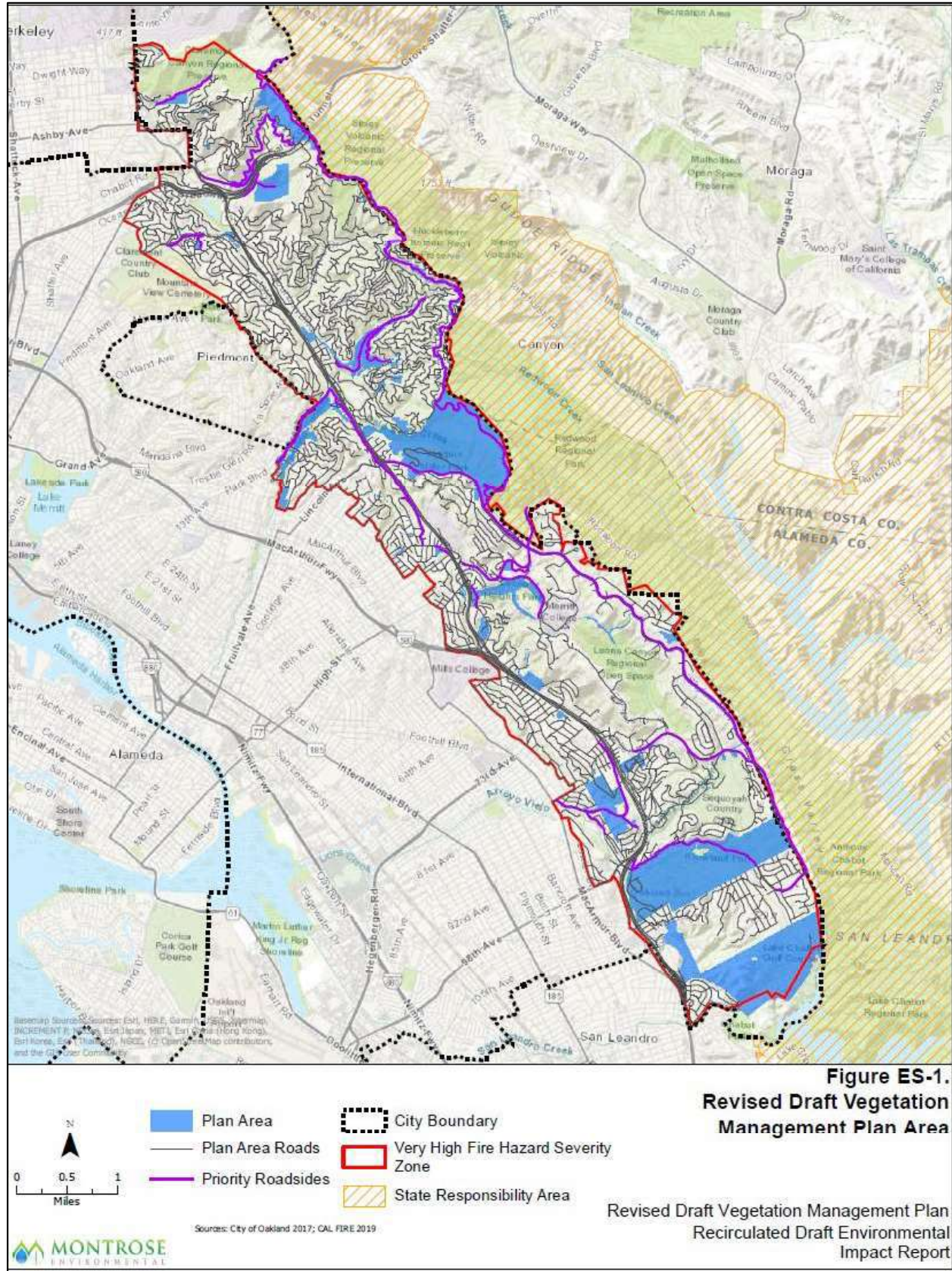


Location:	City-owned parcels and the areas within 100 feet of the edge of roadsides located within the City's Very High Fire Hazard Severity Zone (VHFHSZ) as designated by CAL FIRE, and also defined in Section 4904.3 of the Oakland Fire Code (Oakland Municipal Code Chapter 15.12). The Revised Draft Vegetation Management Plan (Revised Draft VMP) area includes: 419 City-owned parcels, ranging in size from <0.1 acres to 235 acres and totaling 1,924 acres; and roadside areas along 308 miles of roadway within the City's VHFHSZ, which includes surface and arterial streets, State Routes 13 and 24, and Interstate 580. The parks, recreational and open space areas discussed in the Oakland Vegetation Management Plan are as follows: Beaconsfield Canyon, Garber Park, Dimond Canyon Park, Shepherd Canyon Park, Leona Heights Park, North Oakland Regional Sports Complex, Grizzly Peak Open Space, City Stables, Sheffield Village Open Space, Knowland Park and Arboretum, Joaquin Miller Park, Tunnel Road Open Space, Marjorie Saunders Park, and Oak Knoll.
Proposal:	Conduct a public hearing so members of the public may provide, and the Planning Commission may receive, provide and solicit comments on the Recirculated Draft Environmental Impact Report (Recirculated DEIR) for the Revised Draft VMP.
Applicant:	City of Oakland
Phone Number:	Michael Hunt, Oakland Fire Department / (510) 238-6353
Owner:	City of Oakland
Case File Number:	ER23007
General Plan:	<u>Open Space, Conservation and Recreation (OSCAR) Element</u> Urban Park; Resource Conservation Area <u>Land Use and Transportation Element (LUTE)</u> Local Streets; Collector Streets; Arterial Streets; and Freeways
Zoning:	OS (LP), OS (NP), OS (RSP), OS (RCA), OS (AF), OS (AMP), OS (SU)
Proposed Environmental Determination:	The Recirculated DEIR for the Revised Vegetation Management Plan was published (SCH Number 2019110002) on September 20, 2023. The 45-day public review/comment period began on September 20, 2023 and will end on November 4, 2023 at 5:00 PM.
Historic Status:	9 Landmarks; 1 Area of Primary Importance (API); 18 Areas of Secondary Importance (ASI)
City Council district:	1, 4, 6, and 7
Status:	The first Draft Vegetation Management Plan (VMP) was released on November 1, 2019. A scoping session for the first Draft Environmental Impact Report (prior 2020 DEIR) was conducted by the Planning Commission on November 20, 2019. The prior 2020 DEIR was prepared for the first Draft VMP and circulated for public review in November 2020. In addition to comments received during the prior 2020 DEIR public review period, the Oakland Fire Department (OFD) received additional comments on the first Draft VMP from City representatives and the public. Since then, OFD revised the first Draft VMP further to address this additional feedback. The City has prepared the Recirculated DEIR to evaluate the environmental impacts of changes made to the Revised Draft VMP. The City of Oakland is soliciting comments on the Recirculated DEIR during a 45-day comment period that began on September 20, 2023 and ends on November 4, 2023 at 5:00 p.m.

Action to be Taken:	Receive public and Planning Commission comments on the Recirculated DEIR. No decisions will be made on the project at this hearing.
For further information:	Contact Oakland Fire Department Chief of Staff Michael Hunt at (510) 238-6353 or by email at mhunt@oaklandca.gov . Written comments can be submitted to: DEIR-comments@oaklandvegmanagement.org . Project website: www.oaklandca.gov/projects/oakland-vegetation-management-plan

Project Area Map



SUMMARY

The purpose of this public hearing is for the Planning Commission to solicit, receive and provide comments on the Recirculated Draft Environmental Impact Report (Recirculated DEIR) for the Revised Draft Oakland Vegetation Management Plan (Revised Draft VMP).

The Revised Draft VMP outlines a framework for managing fuel loads and vegetation on City-owned properties and along roadways in the City's wildland urban interface (WUI) areas to reduce the likelihood of a catastrophic wildfire, such as the 1991 Oakland Hills Fire. The Planning Area encompasses approximately 1,925 acres, and 308 miles along roadsides (including surface and arterial streets), State Routes 13 and 24, and Interstate 580.

A DEIR was prepared for the initial Draft VMP and circulated for public review in November 2020. That document is referred to herein as the "prior 2020 DEIR." In addition to comments received during the prior 2020 DEIR public review period, the Oakland Fire Department (OFD) received additional comments on the VMP from City representatives and the public. Since then, OFD revised the initial Draft VMP further to address this additional feedback. The City has prepared this Recirculated DEIR to evaluate the environmental impacts of changes made to the Revised Draft VMP since 2020.

The main revision in the Revised Draft VMP is to expand the vegetation management areas for City-owned parcels from 30 feet to 100 feet wide along roadsides in the VHFHSZ, focused on removing or thinning dead and dying trees (not healthy trees) that are present on City-owned property. Note that this expanded roadside treatment area is limited to City-owned parcels. In addition, some of the maintenance standards have been revised to expand vegetation management activities around habitable structures to provide more defensible space around these structures.

These updates to the Revised Draft VMP are considered "significant new information" that require recirculation under the California Environmental Quality Act (CEQA).

The City is both the applicant and lead agency for the Project, represented by OFD. Under CEQA, a lead agency may proceed directly with Environmental Impact Report (EIR) preparation without an Initial Study if it is clear that an EIR will be required. As the City has made such a determination for this Project, no Initial Study has been prepared.

The Recirculated DEIR analyzes potentially significant environmental impacts in the following categories:

- Aesthetics
- Air Quality
- Biological Resources
- Geology
- Greenhouse Gas Emissions/Global Climate Change
- Hydrology and Water Quality
- Recreation
- Transportation.

Sections where the revisions to the Draft VMP did not affect the analysis in the prior 2020 DEIR have not been recirculated. The prior 2020 DEIR identified one significant and unavoidable environmental impact related to a temporary increase in noise levels that exceed local noise standards due to Revised Draft VMP activities.

The Recirculated DEIR and the Revised Draft VMP are available for review online at:
www.oaklandca.gov/projects/oakland-vegetation-management-plan.

The Recirculated DEIR is also available for review by the public during normal operating hours at the Oakland Fire Department (OFD) office at 150 Frank H. Ogawa Plaza, Suite 3354, Oakland, CA 94612. If assistance accessing documents is needed, including documents incorporated by reference in the Recirculated Draft EIR, please contact the Oakland Fire Department, Fire Prevention Bureau at (510) 238-6353 or by email at MHunt@oaklandca.gov.

BACKGROUND

The Notice of Availability (NOA) for the Recirculated DEIR was published on September 20, 2023 (see **Attachment A**). The public comment period on the DEIR is 45-days and ends on **November 4, 2023** at 5:00 p.m. Comments on the DEIR may be made at the Planning Commission Hearing (November 1, 2023), or in writing to Montrose Environmental, Attn: Ken Schwarz, Principal, Revised Draft VMP Recirculated DEIR Comments, 1 Kaiser Plaza, Suite 340, Oakland, CA 94612; or by email at DEIR-comments@oaklandvegmanagement.org.

Written comments must be received prior to the comment period deadline (5:00 p.m. on November 4, 2023). After all comments are received, a Final VMP and Final EIR/Response to Comments document will be prepared and the Planning Commission will consider the certification of the Final EIR at a later meeting.

The Planning Commission is being asked to provide feedback on the Recirculated DEIR.

PROJECT LOCATION

The areas included within the Revised Draft VMP encompass City-owned parcels and the areas within 30 feet of the edge of roadsides located within the Very High Fire Hazard Severity Zone (VHFHSZ) as designated by the California Department of Forestry and Fire Protection (CAL FIRE) and defined in Section 4904.3 of the Oakland Fire Code (Oakland Municipal Code Chapter 15.12). The Revised Draft VMP area also encompasses the City-owned parcels within 30-100 feet of the edge of roadsides in the VHFHSZ, where dead and dying trees (as determined by a Certified Arborist, Licensed Forester, or Fire Safety Expert) are present on City-owned property and could strike the road if they fell. Note this expanded roadside treatment area is limited to City-owned parcels.

Specifically, as shown in **Figure 1 (Attachment B)**, the Revised Draft VMP area includes: 419 City-owned parcels, ranging in size from <0.1 acres to 235 acres and totaling 1,924 acres. Parcels have been divided into the following categories: urban and residential (51.2 acres), canyon areas (188.7 acres), ridgetop areas (130.2 acres), City park lands and open space (1,522.9), other areas (24.5 acres), and medians (6.1 acres). “Other areas” are developed City-owned properties in the Revised Draft VMP area that include fire stations (nos. 6, 7, 21, 25, and 28), City facilities (parking lots, police stations), paved areas, and parks and playgrounds (e.g., Montclair Park). The Revised Draft VMP also includes roadside areas along 308 miles of roadways within the City’s VHFHSZ, which includes surface and arterial streets, State Routes 13 and 24, and Interstate 580. The parks, recreational and open space areas discussed in the Revised Draft VMP are as follows: Beaconsfield Canyon, Garber Park, Dimond Canyon Park, Shepherd Canyon Park, Leona Heights Park, North Oakland Regional Sports Complex, Grizzly Peak Open Space, City Stables, Sheffield Village Open Space, Knowland Park and Arboretum, King Estates Open Space Park, Joaquin Miller Park, Tunnel Road Open Space, Marjorie Saunders Park, and Oak Knoll.

PROJECT DESCRIPTION

The City has determined that there are areas within Oakland that are at high risk of wildfire, and that vegetation management/fuels reduction will significantly reduce wildfire risk. The Revised Draft VMP outlines a framework for managing fuel loads and vegetation on City-owned properties and along roadways in the City’s VHFHSZ to reduce the likelihood of a catastrophic wildfire, such as the 1991 Oakland Hills Fire. As described in Section 9 of the Revised Draft VMP, the goal of fuel treatment is to alter the structure, composition, and spacing of retained vegetation to moderate potential fire behavior. Retained vegetation

can reduce wind exposure, retain soil and surface fuel moisture, and reduce the potential for soil erosion. Implementation of the Revised Draft VMP would involve thinning, pruning, removal, and otherwise modification of trees and vegetation within the Revised Draft VMP area to reduce the likelihood of a wildfire occurring and to minimize/slow the spread of a wildfire, should one occur. The City has identified the following primary goals to guide preparation of the Revised Draft VMP and its implementation:

- Reduce wildfire hazard on City-owned land and along critical access/egress routes within the City's designated VHFHSZ;
- Reduce the likelihood of ignitions and extreme fire behavior to enhance public and firefighter safety;
- Implement practices to avoid or minimize impacts to natural resources; and
- Maintain an active role in regional efforts to reduce wildfire hazard in the Oakland Hills.

The goals, objectives, and recommendations identified in the Revised Draft VMP are based on a combination of evaluating existing field conditions and current vegetation and fire risk conditions at City parcels; analyzing spatial datasets of environmental and wildfire risk factors in a Geographic Information System (GIS); conducting GIS-based analysis and modeling to identify areas that may be subject to extreme fire behavior; identifying locations within the Revised Draft VMP area that may present increased ignition potential or otherwise contribute to increased fire hazard; and receiving feedback and guidance from many stakeholders through various meetings, site visits, and written comments.

The Revised Draft VMP describes various vegetation management techniques that may be employed depending on site conditions, including hand labor, mechanical processes (e.g., mowing), herbicide use, and grazing.

Appropriate vegetation management techniques to be employed at a specific site would be identified by OFD personnel during annual workplan development. On an annual basis, OFD staff would conduct field assessments of vegetation conditions in the Revised Draft VMP area to guide development of such annual vegetation management work plans. These plans would identify specific treatment types, area or properties to be treated, implementation timing, and other monitoring and tracking needs.

The Revised Draft VMP also identifies best management practices (BMPs) to be implemented during vegetation management activities to reduce or avoid impacts to natural resources present in the Revised Draft VMP area.

Plan Scope and Timeframe

The timeframe for Revised Draft VMP is 10 years. The goals, objectives, methods, and recommendations contained herein should be reviewed at the end of the 10-year timeframe, following a re-evaluation of Revised Draft VMP Area's wildfire hazard conditions and the success of vegetation management actions implemented over the 10-year Revised Draft VMP timeframe. Following such a subsequent review, revisions to Revised Draft VMP goals, objectives, methods, or recommendations may be necessary to reflect wildfire hazard conditions within the Revised Draft VMP Area at a later time.

ENVIRONMENTAL REVIEW PROCESS

Overview of CEQA Requirements

With certain, strictly limited exceptions, CEQA requires all state and local government agencies to consider the environmental consequences of projects over which they have discretionary authority before approving or carrying out those projects. CEQA establishes procedural and substantive requirements that agencies must satisfy to meet CEQA's objectives.

As described in the CEQA Guidelines (Cal. Code Regs., tit. 14, Section 15121, subd. [a]), an EIR is an informational document that assesses potential environmental effects of a proposed project and identifies mitigation measures and alternatives to the project that could reduce or avoid potentially significant environmental impacts. Other key CEQA requirements include developing a plan to implement and monitor the success of the identified mitigation measures and carrying out specific public notice and distribution steps to facilitate public involvement in the environmental review process. As an informational document used in the planning and decision-making process, an EIR's purpose is not to recommend either approval or denial of a project. Note that an EIR does not expand or otherwise provide independent authority for the lead agency to impose mitigation measures or avoid project-related significant environmental impacts beyond the authority already within the lead agency's jurisdiction.

Scope and Intent of the Recirculated DEIR

The City is the lead agency for the CEQA process and has discretionary review and approval authority for project activities that are subject to CEQA (CEQA Guidelines Section 15378). The City will use the analyses presented in the EIR, and the public response to them, to evaluate the revised Draft VMP's environmental impacts. The City of Oakland Planning Commission will be responsible for considering the potential certification of the EIR.

The intent of this Recirculated DEIR is to evaluate in detail the vegetation management activities to be conducted under the Revised Draft VMP, including the changes to VMP treatment activities since the prior 2020 DEIR. The analysis in the Recirculated DEIR has been prepared at a project level in accordance with CEQA Guidelines Section 15161. Accordingly, this Recirculated DEIR focuses on the changes in the environment that could result during all phases of the project, including maintenance planning and implementation, such that the Recirculated DEIR adequately satisfies all CEQA requirements to support project implementation without the need for further CEQA documentation.

Notice of Preparation

A Notice of Preparation of an EIR (NOP) for the VMP was prepared in accordance with the State CEQA Guidelines (CEQA Guidelines Section 15082) and was circulated to the Office of Planning and Research's State Clearinghouse on November 1, 2019. The original scoping period started on November 1, 2019 for 31 days, ending on December 2, 2019. However, the scoping period was extended to December 12, 2019, to allow the public and interested parties additional time to comment on the scope of the prior 2020 DEIR and to correct the contact name and email address of Angela Robinson Piñon, the person receiving comments during the scoping period. Thus, the scoping period extended for a total of 41 days. The NOP presented general background information on the VMP, the scoping process, and the environmental issues to be addressed in the DEIR. Copies of the NOP were distributed by mail and email to a broad range of stakeholders, including state, federal, and local regulatory agencies and jurisdictions, utilities, and interested individuals in the area. In addition, the NOP was published on the City's website (oaklandca.gov/documents/oakland-vegetation-management-plan-comment-period-extension). The NOP is included in the prior 2020 DEIR in Appendix B, Scoping Summary.

Scoping Comments and Meetings

As described in more detail in Section 2.3.2 of the Recirculated DEIR, several public and stakeholder engagement meetings were conducted to support development of the initial Draft VMP and Revised Draft VMP. Six workshops/meetings were conducted in 2017 and 2018 during development of the Draft VMP. In addition to the public meetings, a number of additional phone calls, meetings, and on-site field meetings were held with stakeholders interested in the VMP to collect additional public input. The Oakland City Council, Public Safety Committee further directed the VMP development team to conduct additional outreach to park volunteer/stewardship groups to receive information on current activities being conducted in City parks that occur in the Revised Draft VMP area with the intent of incorporating volunteer/stakeholder input into annual vegetation management planning efforts described in the VMP. In

total, 11 additional group meetings were held in spring 2019 with stakeholders interested in the initial Draft VMP and the Revised Draft VMP.

To provide the public, as well as responsible and trustee agencies, an opportunity to ask questions and submit comments on the initial Draft VMP and the scope of the prior 2020 DEIR, the City held a public scoping meeting during the public scoping period. As described above, notices of the meeting were mailed to interested parties; in addition, scoping meeting information was published on the City's website prior to the event (www.oaklandca.gov/projects/oakland-vegetation-management-plan).

The scoping meeting was held before the Oakland Planning Commission on Wednesday, November 20, 2019, at 6:00 p.m. at Oakland City Hall, 1 Frank H. Ogawa Plaza, Oakland.

The City also presented an update on the initial Draft VMP and prior 2020 DEIR as an item to the Public Safety Committee of the City Council on Tuesday, December 3, 2019.

The City accepted verbal and written comments at the scoping meeting, as well as Public Safety Committee meeting, and accepted both written and electronic comments (via email) during the 41-day scoping period. During the scoping period, 41 comment letters were received. These comments were considered in this CEQA evaluation and are summarized in Appendix B of the prior 2020 DEIR, Scoping Summary.

The prior 2020 DEIR was released for a 45-day public review and comment period on November 24, 2020. On December 16, 2020, the City Planning Commission, by motion, voted 4-0 to extend the public comment period 15 days from January 7, 2021 to January 22, 2021, for a total of 60 days. The City also conducted a public meeting on the prior 2020 DEIR on December 16, 2020.

Organization of the Prior 2020 DEIR and the Recirculated DEIR

The following list identifies the components of the prior 2020 DEIR and indicates which portions of that document are included in the Recirculated DEIR:

Executive Summary. (*recirculated*)

Chapter 1, Introduction. (*recirculated*)

Chapter 2, Project Description. (*recirculated*)

Chapter 3, Environmental Setting, Impacts, and Mitigation Measures. (*portions recirculated*)

Chapter 4, Other Statutory Considerations. (*recirculated*)

Chapter 5, Alternatives. (*recirculated*)

Chapter 6, References. (*recirculated*)

Chapter 7, Report Preparation. (*recirculated*)

Appendices

Appendices A, C, and D are provided as part of the Recirculated DEIR. The Recirculated DEIR retains the same appendix numbering as the prior 2020 DEIR.

- Appendix A, Revised Draft Vegetation Management Plan (*recirculated*)
- Appendix B, Scoping Summary (*not recirculated*)
- Appendix C, Air Quality/Greenhouse Gas/Energy Calculations (*recirculated*)
- Appendix D, Biological Resources Information (*recirculated*)
- Appendix E, Cultural Resources Record Search Information (*not recirculated*)
- Appendix F, Noise (*not recirculated*)
- Appendix G, Tribal Cultural Resources (*not recirculated*)

Sections Eliminated from Further Analysis and Sections Not Recirculated

Section 3.1 contains an introduction to the impact analysis conducted in the Recirculated DEIR and identifies resource topic areas determined not to be affected by the Revised Draft VMP. Six resource topics have been eliminated from further analysis based on the nature and scope of the Revised Draft VMP activities. The following topics were found to either result in no impacts or impacts that were less than significant as a result of the Revised Draft VMP activities: Agriculture and Forestry, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, and Utilities.

Six resource topics that were analyzed in the prior 2020 DEIR did not require revision, and therefore are not included in the Recirculated DEIR: Cultural and Resources, Tribal Cultural Resources, Hazards and Hazardous Emissions, Noise and Vibration, and Wildfire. This analysis is described in detail in Section 3.1 of the Recirculated DEIR.

Recirculated Sections

The Recirculated DEIR analyzes the following topics in detail:

- Aesthetics,
- Air Quality,
- Biological Resources,
- Geology, Soils, And Seismicity,
- Greenhouse Gas Emissions,
- Hydrology and Water Quality,
- Recreation, and
- Transportation

Potentially Significant Impacts Identified in the DEIR

All impacts, and draft Mitigation Measures identified in the EIR, including for sections of the prior 2020 DEIR that have not been recirculated, are summarized in Table ES-3 in the Recirculated DEIR Executive Summary as well as **Attachment C** to this staff report.

The Recirculated DEIR has identified a **cumulative environmental impact** to biological resources within the Revised Draft VMP area that is **less than significant with mitigation**. The DEIR has also identified **significant and unavoidable** environmental impacts related to noise.

Cumulative Impact BIO 1: Cumulative Effects on Biological Resources

Revised Draft VMP activities and ongoing activities conducted under regional vegetation management and conservation plans could result in the loss of wetlands and water features. These outcomes could potentially lead to direct take or loss of habitat for both common and special-status species, including the Alameda whipsnake and California red-legged frog. The Revised Draft VMP area contains a wide variety of sensitive natural communities that support many special-status species, including brittle leaf – woolly leaf manzanita chaparral, bush monkeyflower scrub, California bay forest, freshwater emergent wetland, needle grass – melic grass grassland, redwood forest, red alder forest, and valley/foothill riparian. As a result, anticipated growth and development in Oakland, along with other vegetation management and conservation plans contiguous to the Revised Draft VMP area, could result in cumulative effects on special-status species and sensitive habitats.

Ground-disturbing activities associated with the other vegetation management and conservation plans could disturb or directly injure or kill special-status species or result in permanent loss of habitat, all of which would be significant impacts. However, it is expected that other plans contiguous to the Revised Draft VMP area would be required to implement the same types of mitigation measures to offset their adverse effects on special-status species and other sensitive biological resources as those identified for the Revised Draft VMP. Some cumulative projects in the Revised Draft VMP area would have long-term direct benefits to specific species in the area, such as the Chabot Space and Science Center (CSSC) Vegetation Management

Implementation Plan and CSSC Pallid Manzanita Habitat Enhancement and Conservation Plan, which are designed improve habitat conditions for pallid manzanita. Additionally, the EBMUD Low Effect East Bay Habitat Conservation Plan identifies general and species-specific biological goals regarding identification and avoidance of sensitive species. However, the Alameda County Plan Bay Area 2040 and the City of Oakland General Plan anticipate population and housing growth over the next 10 years; this ongoing development would also contribute to significant impacts on biological resources. Overall, the potential to adversely affect special-status species, wetlands, and water features would result in a significant cumulative impact.

As described in Section 3.4, Biological Resources, of the Recirculated DEIR, the Revised Draft VMP would involve vegetation management activities in various locations that could impact special-status plants and wildlife, as well as wetlands and water features. If left unmitigated, these impacts would result in a considerable contribution to a cumulative impact.

Please refer to Section 3.4 of the recirculated DEIR for more information on measures to mitigate potential biological impacts. Biology-related mitigations are briefly provided below.

- **Mitigation Measure BIO 1:** Provide Biologist Review and Worker Training.
- **Mitigation Measure BIO 2a:** Avoid Special Status Plant Species
- **Mitigation Measure BIO 2b:** Provide Compensatory Mitigation for Special Status Plant Species
- **Mitigation Measure BIO 3:** Seeding with Native Species.
- **Mitigation Measure BIO-4:** Avoid Presidio Clarkia Sensitive Time Periods
- **Mitigation Measure BIO 5:** Grazing.
- **Mitigation Measure BIO-6:** Trash Removal.
- **Mitigation Measure BIO-7:** Protection of Alameda Whipsnake.
- **Mitigation Measure BIO-8:** Protection of California Red-legged Frogs and Western Pond Turtles.
- **Mitigation Measure BIO-9:** Protection of California Red-legged Frogs from Herbicide Use.
- **Mitigation Measure BIO 10:** Minimize Impacts to Nesting Birds via Site Assessments and Avoidance Measures.
- **Mitigation Measure BIO 11:** Protection of Bat Colonies.
- **Mitigation Measure BIO-12:** Protection of Dusky-footed Woodrats.
- **Mitigation Measure BIO-13:** Avoid Monarch Butterfly Host Plants and Overwintering Sites
- **Mitigation Measure BIO-14:** Avoid Crotch Bumble Bee Nests
- **Mitigation Measure BIO 15:** Avoid Riparian Habitat and Develop and Implement a Plan to Replace Affected Riparian Habitat.
- **Mitigation Measure BIO-16:** Prevent the Spread of Invasive Plants and Plant Pathogens.
- **Mitigation Measure BIO-17:** Avoid Impacts on Federally Protected and State-Protected Wetlands and Waters, as Feasible.
- **Mitigation Measure BIO-18:** Provide Compensatory Mitigation for Unavoidable Impacts on Waters of the United States and the State.

Adherence to Mitigation Measures BIO-1 through BIO-18 identified in Section 3.4 would mitigate impacts of the Revised Draft VMP to special status species, wetlands, and water features to a less than significant level. Considering that the Revised Draft VMP would not convert large areas of sensitive habitat and would avoid, minimize, or mitigate temporary and permanent effects to the maximum extent practicable with implementation of the above-mentioned mitigation measures, the Revised Draft VMP's

contribution to cumulative impacts on biological resources would not be considerable. Therefore, this impact would be **less than significant with mitigation**.

Significant and Unavoidable Noise Impacts

The City analyzed noise and groundborne vibrations that could be caused by Revised Draft VMP activities and compared those findings against established standards contained in the City of Oakland Municipal Code and General Plan. For more information about this analysis, please refer to Section 3.10 of the prior 2020 DEIR. Cumulative Impact NOI-2 describes impacts related to noise. Mechanical treatment activities and vehicles associated with other vegetation management and conservation plans would result in increased noise levels in areas adjacent to the Revised Draft VMP area.

Although these increases would likely be temporary, they would affect sensitive receptors in residential areas and open spaces that are the targets of the plans. In addition, the Alameda County Plan Bay Area 2040 anticipates population growth of approximately 1.4 percent per year over the next 10 years; this ongoing development would also contribute to significant impacts related to noise. Overall, the increases in noise levels would result in a significant cumulative impact.

Please refer to Section 3.10.3 of the prior 2020 DEIR for more information on measures to mitigate noise.

Noise mitigations are briefly provided below.

Mitigation Measure NOI-1: Limit Work Near Sensitive Receptors.

Mitigation Measure NOI-2: Notify Sensitive Receptors Near Treatment Areas.

There is no additional feasible mitigation that could be implemented to decrease noise levels at receptors. The use of temporary sound barriers between construction activity and the sensitive receptors is a common construction-related noise mitigation measure. However, this strategy is not feasible to implement for Revised Draft VMP management activities because of the location, nature, and pace of the treatment work. Installing temporary sound barriers in the Revised Draft VMP Area would often be a hazard to workers, the public, and nearby structures or buildings because of the hilly, vegetated, and undeveloped terrain, and sound barriers could inhibit wildlife movement in the area. Establishing a distance from residences within which noise-generating treatments or hand-operated power tools and heavy equipment would be prohibited is another potential mitigation strategy. However, prohibiting or reducing the effectiveness of treatments near residences would prevent the City from accomplishing the primary objective of the Revised Draft VMP. Therefore, these potential mitigation strategies are not feasible. For the reasons described above, even with implementation of Mitigation Measures NOI-1 and NOI-2, the Revised Draft VMP would make a considerable contribution to the cumulative temporary increases in ambient noise levels in Revised Draft VMP treatment areas; this cumulative impact would be **significant and unavoidable**.

Growth Inducement

The Revised Draft VMP would neither involve the construction of new housing nor directly or indirectly result in population growth. Similarly, implementation of the Revised Draft VMP would not result in significant increases in employment, given modest increases in crew sizes and the relative frequency of vegetation management activities. Therefore, the Revised Draft VMP would not result in growth-inducing impacts. Please refer to Section 4.4 of the Recirculated DEIR for additional analysis.

Project Alternatives

Chapter 5 of the Recirculated DEIR (Alternatives) includes an analysis of alternatives to the proposed Revised Draft VMP. The following alternatives were considered based on public input and because they would meet most of the Revised Draft VMP objectives, may be feasible, and would avoid or substantially reduce impacts of the Revised Draft VMP:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Vegetation Management Activities Alternative
- Alternative 3: No Herbicide Use Alternative
- Alternative 4: Reduced Herbicide Use Alternative
- Alternative 5: Prior 2019 VMP Alternative

Aside from these five alternatives, no other alternatives were considered or dismissed.

Considering the issues discussed in Chapter 5 and presented throughout the Recirculated DEIR, the Revised Draft VMP is considered to be environmentally superior to the other identified alternatives. In comparison to the alternatives, the Revised Draft VMP provides the most appropriate balance of reducing wildfire hazard through limiting ignition potential, reducing fuel loads, and modifying vegetation in an effective manner; avoiding and minimizing impacts to the natural environment through implementation of practices; prioritizing management needs based on fuel loads, terrain, and proximity to roads and structures; and ensuring vegetation management needs are addressed in a reasonable timeframe to protect life and property and reduce public safety and wildfire hazards. The Revised Draft VMP would also ensure that vegetation management activities are conducted consistently in compliance with the methods and approaches identified in the Revised Draft VMP to reduce effects to natural resources and prevent excess and unnecessary vegetation removal. The Revised Draft VMP would also increase the ability of OFD to suppress wildfire in the Revised Draft VMP area, further protecting Revised Draft VMP area resources and require the routine evaluation of effectiveness of vegetation management activities.

PUBLICATION AND DISTRIBUTION OF THE DEIR

The City has prepared the Recirculated DEIR, as informed by public and agency input received during the scoping period, to disclose environmental impacts associated with the Revised Draft VMP. Where any such impacts are significant, feasible mitigation measures and potentially feasible alternatives that would substantially lessen or avoid such effects are identified and discussed. The public review period allows the public an opportunity to provide input to the lead agency on the Recirculated DEIR.

The Recirculated DEIR was made available for public review on **September 20, 2023**. The NOA for the DEIR was distributed to State and local agencies and Interested Parties. The Recirculated DEIR and the Revised Draft VMP are available for review online at: www.oaklandca.gov/projects/oakland-vegetation-management-plan.

The Recirculated DEIR is also available for review by the public during normal operating hours at the Oakland Fire Department office at 150 Frank H. Ogawa Plaza, Suite 3354, Oakland, CA 94612. If assistance accessing documents is needed, including documents incorporated by reference in the Recirculated Draft EIR, please contact the Oakland Fire Department, Fire Prevention Bureau at (510) 238-6353 or by email at MHunt@oaklandca.gov.

The public comment period for the Recirculated DEIR is 45-days. The Comment period began on **September 20, 2023 and will end on November 4, 2023 at 5:00 PM**.

CONCLUSION

The Planning Commission is being asked to provide feedback on the Recirculated DEIR and Revised Draft VMP. All comments received on the prior 2020 DEIR and the current Recirculated DEIR, including (a) comments received during the circulation period for the prior 2020 DEIR, and (b) comments received during the recirculation period on the current Recirculated DEIR, will be considered by the City prior to finalizing the EIR and making a decision on the Revised Draft VMP. Comments have previously been submitted on the prior 2020 DEIR. Those comments will be considered by the City. Now at this stage, comments are welcome on the Recirculated DEIR, and more specifically, any comments now submitted should focus on the elements of the Recirculated DEIR which have been revised from the prior 2020

DEIR. Comments submitted now should not address issues from the prior 2020 DEIR that have not changed or been updated in the Revised Draft VMP. Comments on the new or revised elements of the Recirculated DEIR should focus on the adequacy of the EIR in discussing possible impacts on the physical environment, ways in which potential adverse effects might be minimized, and alternatives directly related to the elements that have changed or been revised in the Revised Draft VMP in light of the EIR's purpose to provide useful and accurate information about such factors. Comments received at this Planning Commission meeting will help further shape the preparation of the final documents.

After the conclusion of the comment period, City staff and the consultant team will integrate public feedback on the Recirculated DEIR. Then the formal adoption process, with the FEIR (including responses to DEIR comments), and EIR certification process will commence. The process will begin with the Planning Commission review and recommendation, followed by City Council review and consideration for final adoption. The table that follows briefly summarizes the actions remaining to adopt the Revised Draft VMP and their tentative dates.

Action	Hearing Body/Responsible	Date (if known)
Recirculated DEIR Comment Period	Stakeholders and Interested Parties	September 20, 2023 – November 4, 2023
Review Recirculated DEIR	Planning Commission	November 1, 2023
Prepare Final EIR and Final VMP	City Staff and Consultant Team	Late 2023 – Early 2024
Release Final EIR	City Staff and Consultant Team	Winter/Spring 2024
Review Final EIR and Final VMP	Planning Commission	Spring 2024
Council Hearings on Final EIR and Final VMP	Oakland City Council	Spring/Summer 2024
Notice of Determination Filed	City Staff and Consultant Team	Summer 2024

RECOMMENDATIONS:

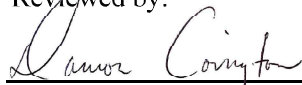
1. Take public testimony on the DEIR and Draft VMP
2. Provide comments to staff on the DEIR and Draft VMP
3. Close the public hearing with respect to the receipt of oral comments; written comments on the DEIR will be accepted until November 4, 2023 at 5 PM.

Prepared by:

Michael Hunt

Michael Hunt, Chief of Staff
Oakland Fire Department

Reviewed by:



Damon Covington
Interim Fire Chief
Oakland Fire Department

Approved for forwarding to the Planning Commission:


Edwards Manasse (Oct 25, 2023 15:14 PDT)

Ed Manasse, Deputy Director
Bureau of Planning

ATTACHMENTS:

- A. Notice of Availability (NOA)
- B. Project Area Map
- C. Summary Table of Environmental Impacts and Mitigation Measures (Table ES-3)
- D. Revised Draft Oakland Vegetation Management Plan (<https://www.oaklandca.gov/projects/oakland-vegetation-management-plan>)
- E. Recirculated Draft Environmental Impact Report for the Revised Draft Oakland Vegetation Management Plan (https://cao-94612.s3.amazonaws.com/documents/OVMP_Recirculated_DEIR_092023.pdf)

Signature: 
Michael Hunt (Oct 25, 2023 10:37 PDT)

Email: MHunt@oaklandca.gov