

Case File Number ER20011

December 16, 2020

Location:	City-owned parcels and the areas within 30 feet of the edge of roadsides located within the City's Very High Fire 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 Draft Plan area includes: 422 City-owned parcels, ranging in size from <0.1 acres to 235 acres and totaling 1,924.9 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, and Sulfur Springs Park.
Proposal:	Conduct a public hearing and solicit/provide comments on the Draft Oakland Vegetation Management Plan (VMP or Draft Plan) and its Draft Environmental Impact Report (DEIR), which studies any potential environmental impacts of the Draft Plan.
Applicant:	City of Oakland
Case File Number:	ER20011
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), RD, RH
Environmental Determination:	The Draft EIR for the Oakland Vegetation Management Plan was published (SCH Number 2019110002) on November 24, 2020. The 45-day public review/comment period began on November 24, 2020 and will end on January 7, 2021 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 Draft VMP was released on November 1, 2019. A scoping session for the DEIR was conducted by the Planning Commission on November 20, 2019. The VMP was recently presented to the Planning Commission on December 2, 2020. The City of Oakland is soliciting comments on both the Draft VMP and DEIR during a 45-day comment period that begins on November 24, 2020 and ends on January 7, 2021 at 5:00 PM.

Action to be Taken:	Receive public and Planning Commission comments on the Draft VMP and Draft EIR. No decisions will be made on the project at this hearing.
For Further Information:	Contact Angela Robinson Piñon at (510) 238-3707 or by email at arobinsonpinon@oaklandca.gov . Written comments can be submitted to: DEIR-comments@oaklandvegmanagement.org . Project website: www.oaklandca.gov/projects/oakland-vegetation-management-plan

SUMMARY

The purpose of this public hearing is to solicit comments on the Draft Environmental Impact Report (DEIR) on the Draft Oakland Vegetation Management Plan (VMP or Draft Plan).

The City of Oakland has prepared a DEIR on the Draft Plan. The Draft Plan 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.

The City is both the applicant and lead agency for the Project, represented by the Oakland Fire Department. Under the California Environmental Quality Act (CEQA), a lead agency may proceed directly with 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 Draft EIR covers the following topic areas:

- Aesthetics,
- Air Quality,
- Biological Resources,
- Cultural and Historic Resources (including Tribal Cultural Resources),
- Energy,
- Geology and Soils (including Geological and Seismic Hazards),
- Greenhouse Gas Emissions/Global Climate Change,
- Hazards and Hazardous Materials,
- Hydrology and Water Quality,
- Noise and Vibration,
- Recreation,
- Transportation, and
- Wildfire

The DEIR identifies one significant and unavoidable environmental impact related to a temporary increase in noise levels that exceed local noise standards due to VMP activities.

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

please contact Angela Robinson Piñon, at (510) 238-3707 or at arobinsonpinon@oaklandca.gov.
Written comments on the DEIR can be submitted to:
DEIR-comments@oaklandvegmanagement.org.

BACKGROUND

The Notice of Availability (NOA) for the DEIR was published on November 24, 2020 (see **Attachment A**). The public comment period on the DEIR is 45-days and ends on January 7, 2021 at 5:00 p.m. Comments on the DEIR may be made at the Planning Commission Hearing (December 16, 2020), or in writing to the Horizon Water and Environment, LLC / Attn: Ken Schwarz, Principal, VMP DEIR Comments, 266 Grand Avenue, Suite 210, Oakland, CA 94610; or by email at DEIR-comments@oaklandvegmanagment.org. Written comments must be received prior to the comment period deadline (5:00 PM on January 7, 2021). After all comments are received, a Revised Draft 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 Draft VMP and its DEIR.

PROJECT LOCATION

The areas included within the VMP encompass City-owned parcels and the areas within 30 feet of the edge of roadsides located within the City's Very High Wildfire Hazard Severity Zone (VHFHSZ) as designated by CAL FIRE, and defined in Section 4904.3 of the Oakland Fire Code (Oakland Municipal Code Chapter 15.12). Specifically, as shown in **Figure 1 (Attachment B)**, the 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 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 VMP also includes roadside areas along 308 miles of road 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 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 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. Implementation of the VMP would involve thinning, pruning, removal, and otherwise modification of trees and vegetation within the 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 Draft Plan 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;
- Maintain an active role in regional efforts to reduce wildfire hazard in the Oakland Hills.

The goals, objectives, and recommendations identified in the 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 VMP area that may present increased ignition potential or otherwise contribute to increase fire hazard; and receiving feedback and guidance from many stakeholders through various meetings, site visits, and written comments.

The 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, Oakland Fire Department (OFD) staff would conduct field assessments of vegetation conditions in the OVMP 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 VMP and DEIR also identify best management practices (BMPs) to be implemented during vegetation management activities to reduce or avoid impacts to natural resources present in the VMP area.

Plan Scope and Timeframe

The timeframe for 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 Plan Area's wildfire hazard conditions and the success of vegetation management actions implemented over the 10-year VMP timeframe. Following such subsequent review, revisions to VMP goals, objectives, methods, or recommendations may be necessary to reflect wildfire hazard conditions within the Plan Area at a later time.

ENVIRONMENTAL REVIEW PROCESS

Overview of CEQA Requirements

With certain, strictly limited exceptions, California Environmental Quality Act (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 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 this DEIR, and the public response to them, to evaluate the proposed program's environmental impacts. The City of Oakland Planning Commission will be responsible for considering the potential certification of this DEIR.

The intent of this DEIR is to evaluate in detail the vegetation management activities to be conducted under the VMP. The analysis in the DEIR has been prepared at a project level in accordance with CEQA Guidelines Section 15161. Accordingly, this 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 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 public comment period was extended to December 12, 2019, to allow the public and interested parties additional time to comment on the scope of the DEIR and to correct the contact name and email

address of Angela Robinson Piñon, the person receiving comments during the scoping public comment period. Thus, the scoping public comment 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 this DEIR in Appendix B.

Scoping Comments and Meetings

As described in more detail in Section 2.3.2, several public and stakeholder engagement meetings were conducted to support development of the 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 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 VMP.

To provide the public, as well as responsible and trustee agencies, an opportunity to ask questions and submit comments on the VMP and the scope of the 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 the item to the Oakland City Council, Public Safety Committee 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, Scoping Summary.

Certification of the Final EIR

Once the public review period is closed, the City will prepare a Final EIR (FEIR). The FEIR will incorporate this DEIR by reference. It will contain all comments submitted on this DEIR

(including those made at public meetings), responses to those comments, and any revisions to the text of this DEIR. The FEIR will be reviewed by the City of Oakland Planning Commission and considered for approval by the City Council.

Written/mailed and oral comments received in response to the DEIR will be addressed in the "Responses to Comments" section of the FEIR. Together with the DEIR and any related changes to the substantive discussion in the DEIR, these responses will constitute the FEIR. The FEIR, in turn, will inform the City's exercise of its discretion as a lead agency under CEQA in deciding whether or how to approve the VMP.

Organization of the DEIR

This DEIR contains the following components:

Executive Summary.

Chapter 1, Introduction.

Chapter 2, Project Description.

Chapter 3, Environmental Setting, Impacts, and Mitigation Measures.

Chapter 4, Other Statutory Considerations.

Chapter 5, Alternatives.

Chapter 6, References.

Chapter 7, Report Preparation.

Appendices

- Appendix A, Draft Vegetation Management Plan
- Appendix B, Scoping Summary
- Appendix C, Air Quality/Greenhouse Gas/Energy Calculations
- Appendix D, Biological Resources Information
- Appendix E, Cultural Resources Record Search Information
- Appendix F, Noise
- Appendix G, Tribal Cultural Resources

Sections Eliminated from Further Analysis

Section 3.1 contains an introduction to the impact analysis conducted in this DEIR and identifies resource topic areas determined not to be affected by the VMP. Six resource topics have been eliminated from further analysis based on the nature and scope of the 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 VMP activities: Agriculture and Forestry, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, and Utilities. This analysis is described in detail in Section 3.1 of the DEIR. The DEIR analyzed the following topics in detail:

- Aesthetics,
- Air Quality,
- Biological Resources,
- Cultural and Historic Resources (including Tribal Cultural Resources),
- Energy,

- Geology and Soils (including Geological and Seismic Hazards),
- Greenhouse Gas Emissions/Global Climate Change;
- Hazards and Hazardous Materials,
- Hydrology and Water Quality,
- Noise and Vibration,
- Recreation,
- Transportation, and
- Wildfire

Potentially Significant Impacts Identified in the DEIR

All impacts, and draft Mitigation Measures identified in the DEIR are summarized in Table ES-2 in DEIR Executive Summary as well as **Attachment C** to this report.

The DEIR has identified a **cumulative environmental impact** to Biological resources within the 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

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 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 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 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 VMP. Some cumulative projects in the VMP area would have long-term direct benefits to specific species in the area, such as the CSSC Vegetation Management Implementation Plan and CSSC Pallid Manzanita Habitat Enhancement and Conservation Plan, which are designed improve habit conditions for pallid manzanita. Additionally, the EDMUD Low Effect East Bay HCP 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,” the 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 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 Riparian Habitat and Develop and Implement a Plan to Replace Affected Riparian Habitat.

Mitigation Measure BIO-14: Prevent the Spread of Invasive Plants and Plant Pathogens.

Mitigation Measure BIO-15: Avoid Impacts on Federally Protected and State-Protected Wetlands and Waters, as Feasible.

Mitigation Measure BIO-16: Provide Compensatory Mitigation for Unavoidable Impacts on Waters of the United States and the State.

Adherence to Mitigation Measures BIO-1 through BIO-16 identified in Section 3.4 would mitigate impacts of the VMP to special status species, wetlands, and water features to a less than significant level. Considering that the 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 VMP's contribution to cumulative impacts on biological resources would not be considerable. Therefore, this impact would be **less than significant with mitigation**.

Cumulative Impact NOI-2: Cumulative Effects Related to Noise

The City analyzed noise and groundborne vibrations that could be caused by 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 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 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 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 VMP management activities because of the location, nature, and pace of the treatment work. Installing temporary sound barriers in the 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 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 VMP would make a considerable contribution to the cumulative temporary increases in ambient noise levels in VMP treatment areas; this cumulative impact would be **significant and unavoidable**.

Growth Inducement

The VMP would neither involve the construction of new housing nor directly or indirectly result in population growth. Similarly, implementation of the 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 VMP would not result in growth-inducing impacts. Please refer to Section 4.4 of the DEIR for additional analysis.

Project Alternatives

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

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

Considering the issues discussed in the Chapter 5 and presented throughout the DEIR, the VMP is considered to be environmentally superior to the other identified alternatives. In comparison to the alternatives, the 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 VMP would also ensure that vegetation management activities are conducted consistently in compliance with the methods and approaches identified in the VMP to reduce effects to natural resources and prevent excess and unnecessary vegetation removal. The VMP would also increase the ability of OFD to suppress wildfire in the VMP area, further protecting VMP area resources and require the routine evaluation of effectiveness of vegetation management activities.

PUBLICATION AND DISTRIBUTION OF THE DEIR

The City has prepared this DEIR, as informed by public and agency input received during the scoping period, to disclose and discuss potential environmental impacts associated with the 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 DEIR.

The DEIR was made available for public review on November 24, 2020. The Notice of Availability (NOA) for the DEIR was distributed to State and local agencies and mailed to Interested Parties. The DEIR and the Draft VMP are available for review online at: www.oaklandca.gov/projects/oakland-vegetation-management-plan.

Staff would like to call the public's and the Planning Commission's attention to the fact that staff and the consultant have corrected a technological glitch with Figures 3.4-4 thru 3.4-6, which were not appearing in the initially published DEIR. The images that weren't appearing in Figures 3.4-4 to 3.4-6 included maps showing critical habitat for Alameda whipsnake and CNDDDB occurrences in the VMP area. The consultant has fixed this issue, uploading the correct files to the City's website and sending the corrected DEIR to the state clearinghouse.

CONCLUSION

The Planning Commission is being asked to provide feedback on the DEIR and VMP. All comments received on the DEIR will be considered by the City prior to finalizing the EIR and making a decision on the VMP. Comments on the 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 to the VMP in light of the EIR's purpose to provide useful and accurate information about such factors. Comments received at this Planning Commission meeting and thereafter through written comments at DEIR-comments@oaklandvegmanagement.org, will help further shape the preparation of the final documents.

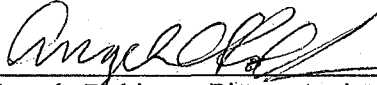
After the conclusion of the comment period, City staff and the consultant team will integrate public feedback on the Draft VMP and DEIR. Then the formal adoption process, with the FEIR (including responses to DEIR comments), and EIR certification process will commence. The process will begin with the 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 VMP and their tentative dates.

Action	Hearing Body/Responsible	Date (if known)
Draft EIR Comment Period	Stakeholders and Interested Parties	November 24, 2020 – January 7, 2021
Review Draft EIR	Planning Commission	December 16, 2020
Prepare Final EIR and Revise VMP	City Staff and Consultant Team	January 2021 – February 2021
Release Final EIR	City Staff and Consultant Team	March 2021
Review Final EIR and Revised VMP	Planning Commission	March 2021
Council Hearings on Final EIR and VMP	Oakland City Council	March – April 2021
Notice of Determination Filed	City Staff and Consultant Team	April 2021

RECOMMENDATION:


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 will be accepted until January 7, 2021 at 5:00 PM.

Prepared by:



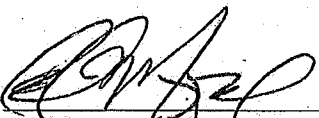
Angela Robinson Piñon, Assistant Director
Bureau of Operations and Administration

Reviewed by:



MELINDA DRAYTON
Interim Fire Chief
Oakland Fire Department

Approved for Forwarding to the
City Planning Commission:



Ed Manasse, Deputy Director
Bureau of Planning

ATTACHMENTS:

- A. Notice of Availability (NOA)
- B. Project Area Map
- C. Summary Table of Impacts Analysis and Mitigations (Table ES-2)
- D. Planning Commission December 2, 2020 Staff Report
- E. Draft Oakland Vegetation Management Plan
- F. Draft Environmental Impact Report for the Oakland Vegetation Management Plan

**CORRECTED NOTICE OF AVAILABILITY (NOA) OF A DRAFT ENVIRONMENTAL
IMPACT REPORT (DEIR) FOR THE OAKLAND VEGETATION MANAGEMENT PLAN AND
NOTICE OF PUBLIC HEARING ON DEIR**

TO: All Interested Parties

SUBJECT: Correction to Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the Oakland Vegetation Management Plan (VMP) and Notice of Public Hearing on the same.

LEAD AGENCY/PROJECT SPONSOR: The City of Oakland

CEQA STATE CLEARINGHOUSE NUMBER: 2019110002

BRIEF SUMMARY OF CORRECTION: The City hereby submits this corrected NOA that corrects a typographical error in the email address for sending written comments on the DEIR. No other changes have been made to the NOA. As corrected below, written comments on the DEIR may be sent by e-mail to: DEIR-comments@oaklandvegmanagement.org. As set forth in both the original and this corrected NOA, written comments may also be submitted via mail at:

Horizon Water and Environment, LLC
Attn: Ken Schwarz, Principal, VMP DEIR Comments
266 Grand Avenue, Suite 210
Oakland, CA 94610

PROJECT LOCATION: The areas included within the VMP encompass City-owned parcels and the areas within 30 feet of the edge of roadsides located within the City's Very High Wildfire Hazard Severity Zone (VHFHSZ) as designated by CAL FIRE, and defined in Section 4904.3 of the Oakland Fire Code (Oakland Municipal Code Chapter 15.12). Specifically, as shown in **Figure 1** (attached), the 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 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 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 OVMP 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 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. Implementation of the VMP would involve thinning, pruning, removal, and otherwise modification of trees and vegetation within the 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 Plan 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;
- Maintain an active role in regional efforts to reduce wildfire hazard in the Oakland Hills.

The goals, objectives, and recommendations identified in the 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 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 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 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 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 VMP area.

PUBLIC REVIEW AND COMMENT PERIOD: The City invites comments on the Draft Vegetation Management Plan (VMP) and DEIR during a 45-day comment period that begins on November 24, 2020 and ends on January 7, 2021 at 5:00 PM. The City prefers that written comments be submitted via email at: DEIR-comments@oaklandvegmanagement.org. Please reference **VMP DEIR Comments** in all correspondence. Comments may also be submitted via mail to the following address:

Horizon Water and Environment, LLC
 Attn: Ken Schwarz, Principal, VMP DEIR Comments
 266 Grand Avenue, Suite 210
 Oakland, CA 94610

Comments will also be received at the public meetings to be held as noticed below. Written comments submitted via e-mail and mail can be provided no later than **January 7, 2021 at 5:00 PM.**

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

PUBLIC HEARINGS: In accordance with the revised Emergency Order No. 3 of the City of Oakland that was adopted due to the outbreak of COVID-19, meetings of the Oakland City Council and of the Planning Commission are being conducted online, rather than in person.

The City Planning Commission will conduct a public meeting on the DEIR for the project on **December 16, 2020 at 3:00 PM.**


For more information about how to participate in this meeting, please visit:
<https://www.oaklandca.gov/boards-commissions/planning-commission>

ENVIRONMENTAL REVIEW: A Draft Environmental Impact Report (DEIR) was prepared for the project under the requirements of the California Environmental Quality Act (CEQA), pursuant to the Public Resources Code Section 21000 *et. seq.* The DEIR analyzes potentially significant environmental impacts in the following categories: Aesthetics, Air Quality, Biological Resources, Cultural and Historic Resources (including Tribal Cultural Resources), Energy, Geology and Soils (including Geological and Seismic Hazards), Greenhouse Gas Emissions/Global Climate Change, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise and Vibration, Recreation, Transportation, and Wildfire. The DEIR identifies one significant and unavoidable environmental impact related to a temporary increase in noise levels that exceed local noise standards due to VMP activities.

The City of Oakland is hereby releasing this Draft Environmental Impact Report (DEIR), finding it to be accurate and complete and ready for public review. Members of the public are invited to comment on the DEIR and the project. There is no fee for commenting, and all comments received will be considered by the City prior to finalizing the DEIR and making a decision on the project. Comments on the DEIR should focus on the sufficiency of the DEIR in discussing possible impacts on the physical environment, ways in which potential adverse effects might be minimized, and alternatives to the project in light of the DEIR's purpose to provide useful and accurate information about such factors.

If you challenge the environmental document or project in court, you may be limited to raising only those issues raised at the hearings described above, or in written correspondence received on or prior to January 8, 2021 at 5:00 PM. Following the close of the public review period for the DEIR, the City will prepare a final EIR, incorporating and responding to all comments received during the public comment period, for consideration by the Planning Commission, at a date for which notice shall be provided. As required by CEQA (§21092.5), the final EIR, including written responses to the comments submitted by public agencies, will be provided to commenting agencies at least 10 days prior to certification. For further information, please contact Angela Robinson Piñon, at (510) 238-3707 or at arobinsonpinon@oaklandca.gov.

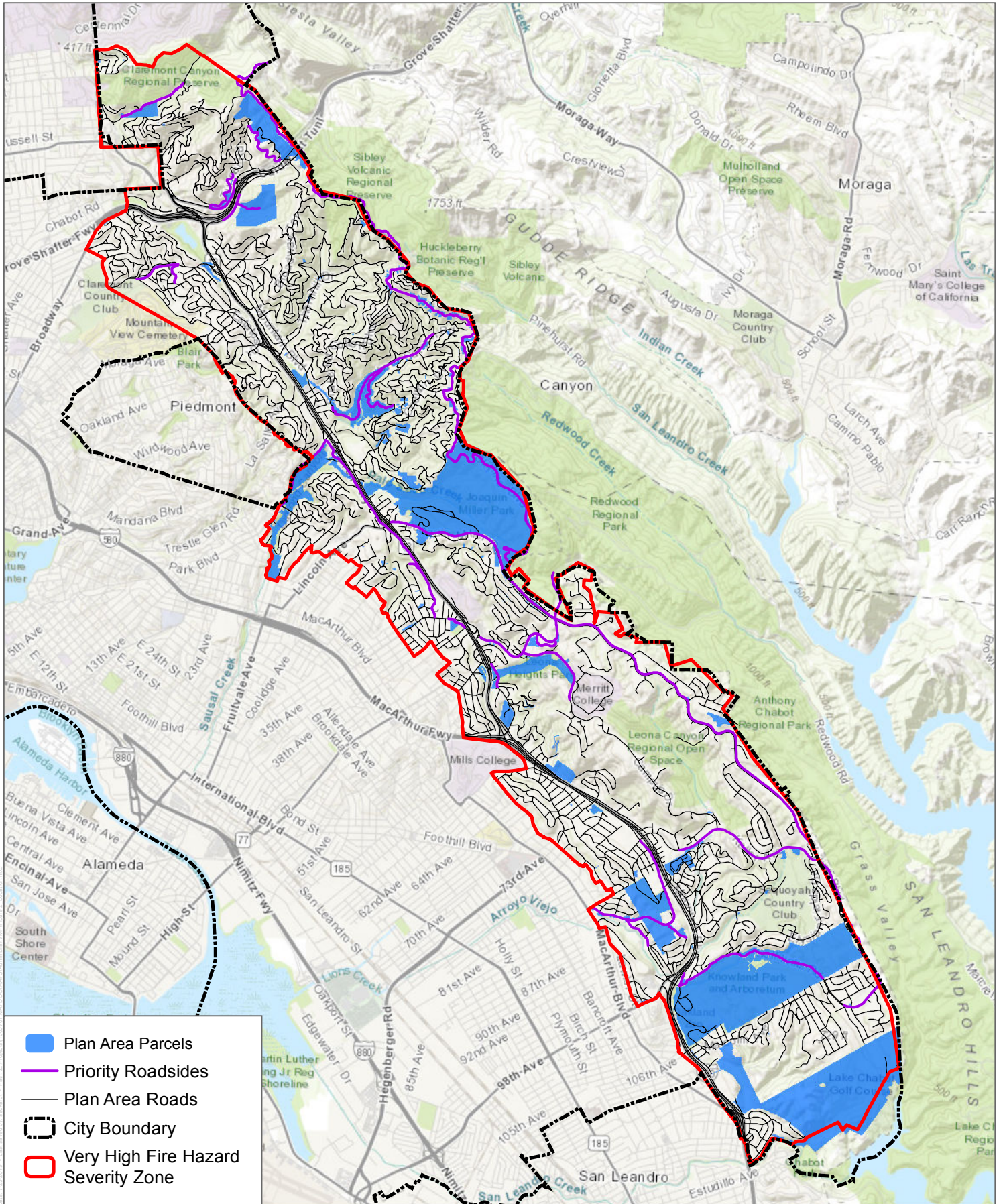
November 25, 2020



EDWARD MANASSE
City of Oakland
Environmental Review Officer

Attachment:

Figure 1, Location Map



SOURCE: ESRI 2017; City of Oakland 2017

FIGURE 1
Location Map

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<i>Aesthetics</i>			
AES-1: Substantial Adverse Effects on Public Scenic Vistas	S	AES-1: Conduct Visual Reconnaissance Prior to Implementing Tree Removal Activities to Determine if Vegetation Relocation or Thinning of Publicly Visible Treatment Areas is Necessary	LSM
AES-2: Substantial Damage to Scenic Views, Including Those within a State or Locally Designated Scenic Highway	S	AES-1: Conduct Visual Reconnaissance Prior to Implementing Tree Removal Activities to Determine if Vegetation Relocation or Thinning of Publicly Visible Treatment Areas is Necessary	LSM
AES-3: Short-term Degradation of Visual Character or Quality of Public Views	S		LSM
Grazing	LTS	None required	LTS
Mechanical and Hand Labor Treatments	S	AES-2: Staging (VMP BMP GEN-4)	LSM
Herbicides	LTS	None required	LTS
AES-4: Long-term Degradation of Visual Character or Quality of Public Views	S	AES-1: Conduct Visual Reconnaissance Prior to Implementing Tree Removal Activities to Determine if Vegetation Relocation or Thinning of Publicly Visible Treatment Areas is Necessary	LSM
<i>Air Quality</i>			
AQ-1: Conflict with or Obstruct Implementation of Applicable Air Quality Plans	LTS	None required	LTS

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
AQ-2: Violate Any Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation, or Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for Which the Project Region Is in Nonattainment	S	AQ-1: Fugitive Dust BMPs GEO-1: Minimize Area of Disturbance (VMP BMP GEN-2) HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8) HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)	LSM
AQ-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations	S		LSM
Mechanical and Hand Labor Treatments	S	AQ-1: Fugitive Dust BMPs AQ-2: Comply with Asbestos ATCM by Obtaining an Approved Asbestos Dust Mitigation Plan or Exemption GEO-1: Minimize Area of Disturbance (VMP BMP GEN-2)	LSM
Grazing	LTS	None required	LTS
Herbicides	S	HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements	LSM
AQ-4: Result in Other Emissions Such as Odors Adversely Affecting a Substantial Number of People	LTS	None required	LTS
<i>Biological Resources</i>			
BIO-1: Potential Adverse Effects on Special-Status Plant Species	S		LSM
BIO-1A: State-Listed and/or Federally Listed Special-Status Plants	S		LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Mechanical and Hand Labor Treatments	S	BIO-1: Provide Biologist Review and Worker Training BIO-2a: Avoid Special-Status Plant Species (revised from VMP BMP BIO-3) BIO-2b: Provide Compensatory Mitigation for Special-Status Plant Species BIO-3: Seeding with Native Species (VMP BMP BIO-10) BIO-4: Avoid Presidio Clarkia Sensitive Time Periods GEO-1: Minimize Area of Disturbance (VMP BMP GEN-2)	LSM
Grazing	S	BIO-2a: Avoid Special-Status Plant Species (revised from VMP BMP BIO-3) BIO-5: Grazing (revised from VMP BMP BIO-6)	LSM
Herbicides	S	BIO-1: Provide Biologist Review and Worker Training BIO-2a: Avoid Special-Status Plant Species (revised from VMP BMP BIO-3) HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)	LSM
BIO-1B: CRPR 1B or 2 Plants	S		LSM
Mechanical and Hand Labor Treatments	S	BIO-1: Provide Biologist Review and Worker Training BIO-2a: Avoid Special-Status Plant Species (revised from VMP BMP BIO-3) BIO-2b: Provide Compensatory Mitigation for Special-Status Plant Species BIO-3: Seeding with Native Species (VMP BMP BIO-10) GEO-1: Minimize Area of Disturbance (VMP BMP GEN-2)	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Grazing	S	BIO-2a: Avoid Special-Status Plant Species (revised from VMP BMP BIO-3) BIO-5: Grazing (revised from VMP BMP BIO-6)	LSM
Herbicides	S	BIO-1: Provide Biologist Review and Worker Training BIO-2a: Avoid Special-Status Plant Species (revised from VMP BMP BIO-3) BIO-2b: Provide Compensatory Mitigation for Special-Status Plant Species HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)	
BIO-1C: CRPR 3 or 4 Plants and Plants Listed in the CNPSEB Rare, Unusual and Significant Plants of Alameda and Contra Costa Counties Database with an A rank	S	BIO-1: Provide Biologist Review and Worker Training BIO-2a: Avoid Special-Status Plant Species (revised from VMP BMP BIO-3) BIO-2b: Provide Compensatory Mitigation for Special-Status Plant Species BIO-3: Seeding with Native Species (VMP BMP BIO-10) BIO-5: Grazing (revised from VMP BMP BIO-6) GEO-1: Minimize Area of Disturbance (VMP BMP GEN-2) HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)	LSM
BIO-2: Potential Adverse Effects on Special-Status Wildlife Species	S		LSM
BIO-2A: Potential Adverse Effects on Special-Status Amphibians and Reptiles	S		LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
All Treatments	S	BIO-6: Trash Removal (revised from VMP BMP BIO-7) GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2) GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3)	LSM
Mechanical and Hand Labor Treatments	S	BIO-1: Provide Biologist Review and Worker Training BIO-7: Protection of Alameda Whipsnake (revised from VMP BMP BIO-5) BIO-8: Protection of California Red-legged Frogs and Western Pond Turtles (based on VMP BMP BIO-4)	LSM
Grazing	S	BIO-5: Grazing (revised from VMP BMP BIO-6)	LSM
Herbicides	S	BIO-9: Protection of California Red-legged Frogs from Herbicide Use (VMP BMP BIO-2) HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2) HYD/WQ-1: Work Windows (VMP BMP GEN-1)	LSM
BIO-2B: Potential Adverse Effects on Special-Status Birds and Other Protected Bird Nests			LSM
All Treatments	S	BIO-1: Provide Biologist Review and Worker Training BIO-6: Trash Removal (revised from VMP BMP BIO-7) BIO-10: Minimize Impacts to Nesting Birds via Site Assessments and Avoidance Measures (revised from VMP BMP BIO-1)	LSM
Mechanical and Hand Labor Treatments	S	BIO-10: Minimize Impacts to Nesting Birds via Site Assessments and Avoidance Measures (revised from VMP BMP BIO-1)	LSM
Grazing	S	BIO-5: Grazing (revised from VMP BMP BIO-6)	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Herbicides	S	BIO-10: Minimize Impacts to Nesting Birds via Site Assessments and Avoidance Measures (revised from VMP BMP BIO-1) HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)	LSM
BIO-2C: Potential Adverse Effects on Special-Status Mammals and CEQA-relevant Bat Species	S		LSM
Mechanical and Hand Labor Treatments	S	BIO-1: Provide Biologist Review and Worker Training BIO-11: Protection of Bat Colonies (VMP BMP BIO-8) BIO-12: Protection of Dusky-footed Woodrats (VMP BMP BIO-9)	LMS
Grazing	LTS	None required	LTS
Herbicides	S	HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2) HYD/WQ-1: Work Windows (VMP BMP GEN-1)	LMS
BIO-3: Potential Adverse Effects on Riparian Habitat or Other Sensitive Natural Communities Identified in Local or Regional Plans, Policies, Regulations or by CDFW, USFWS, or NMFS	S		LSM
BIO-3A: Impacts on Riparian Habitat or Other Sensitive Natural Communities	S		LSM
All Treatments	S	BIO-1: Provide Biologist Review and Worker Training GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2) HYD/WQ-1: Work Windows (VMP BMP GEN-1)	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Mechanical and Hand Labor Treatments	S	BIO-13: Avoid Riparian Habitat and Develop and Implement a Plan to Replace Affected Riparian Habitat	LSM
Grazing	S	BIO-5: Grazing (revised from VMP BMP BIO-6) BIO-13: Avoid Riparian Habitat and Develop and Implement a Plan to Replace Affected Riparian Habitat	LSM
Herbicides	S	HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)	LSM
BIO-3B: Impacts Caused by Non-native and Invasive Species and Pathogens	S		LSM
Mechanical Treatments	S	BIO-1: Provide Biologist Review and Worker Training BIO-3: Seeding with Native Species (VMP BMP BIO-10) BIO-14: Prevent the Spread of Invasive Plants and Plant Pathogens HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8)	LSM
Hand Labor Treatments	S	BIO-14: Prevent the Spread of Invasive Plants and Plant Pathogens	LSM
Grazing	LTS	None required	LTS
Herbicides	S	BIO-14: Prevent the Spread of Invasive Plants and Plant Pathogens	LSM
BIO-4: Potential Adverse Effects on Federally Protected or State-Protected Wetlands	S		LSM
Mechanical Treatments	S	BIO-1: Provide Biologist Review and Worker Training BIO-5: Grazing (revised from VMP BMP BIO-6) BIO-6: Trash Removal (revised from VMP BMP BIO-7)	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>BIO-15: Avoid Impacts on Federally Protected and State-Protected Wetlands and Waters, as Feasible</p> <p>BIO-16: Provide Compensatory Mitigation for Unavoidable Impacts on Waters of the United States and the State</p> <p>GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2)</p> <p>GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3)</p> <p>HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8)</p> <p>HAZ-2: Vehicle and Equipment Fueling (VMP BMP GEN-9)</p> <p>HAZ-3: On-Site Hazardous Materials Management (VMP BMP GEN-5)</p> <p>HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides</p> <p>HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)</p> <p>HAZ-6: Spill Prevention and Response (VMP BMP GEN-7)</p> <p>HAZ-8: Existing Hazardous Materials (VMP BMP GEN-6)</p> <p>HYD/WQ-1: Work Windows (VMP BMP GEN-1)</p>	
Hand Labor Treatments	S	<p>BIO-15: Avoid Impacts on Federally Protected and State-Protected Wetlands and Waters, as Feasible</p> <p>BIO-16: Provide Compensatory Mitigation for Unavoidable Impacts on Waters of the United States and the State</p> <p>HYD/WQ-1: Work Windows (VMP BMP GEN-1)</p>	LSM
Grazing	S	BIO-5: Grazing (revised from VMP BMP BIO-6)	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Herbicides	S	HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2) HYD/WQ-1: Work Windows (VMP BMP GEN-1)	LSM
BIO-5: Potential Interference with Wildlife Movement, Established Wildlife Corridors, or the Use of Native Wildlife Nursery Sites	S		LSM
BIO-5A: Wildlife Movement	LTS	None required; further reduced with BIO-5: Grazing (revised from VMP BMP BIO-6)	LTS
BIO-5B: Potential Adverse Effects on Non-special-status Fish	S		LSM
All Treatments	S	BIO-1: Provide Biologist Review and Worker Training BIO-13: Avoid Riparian Habitat and Develop and Implement a Plan to Replace Affected Riparian Habitat	LSM
Mechanical Treatments	S	BIO-15: Avoid Impacts on Federally Protected and State-Protected Wetlands and Waters, as Feasible BIO-16: Provide Compensatory Mitigation for Unavoidable Impacts on Waters of the United States and the State GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2) GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3) HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8) HAZ-2: Vehicle and Equipment Fueling (VMP BMP GEN-9) HAZ-3: On-Site Hazardous Materials Management (VMP BMP GEN-5) HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		HAZ-6: Spill Prevention and Response (VMP BMP GEN-7) HAZ-8: Existing Hazardous Materials (VMP BMP GEN-6) HYD/WQ-1: Work Windows (VMP BMP GEN-1)	
Hand Labor Treatments	LTS	None required	LTS
Grazing	S	BIO-5: Grazing (revised from VMP BMP BIO-6)	LSM
Herbicides	S	HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)	LSM
BIO-6: Conflict with Local Policies or Ordinances Protecting Biological Resources	S		LSM
All Treatments	S	BIO-1: Provide Biologist Review and Worker Training BIO-2a: Avoid Special-Status Plant Species (revised from VMP BMP BIO-3) BIO-2b: Provide Compensatory Mitigation for Special-Status Plant Species BIO-3: Seeding with Native Species (VMP BMP BIO-10) BIO-4: Avoid Presidio Clarkia Sensitive Time Periods BIO-5: Grazing (revised from VMP BMP BIO-6) BIO-6: Trash Removal (revised from VMP BMP BIO-7) BIO-7: Protection of Alameda Whipsnake (VMP BMP BIO-5) BIO-8: Protection of California Red-legged Frogs and Western Pond Turtles (revised from VMP BMP BIO-4) BIO-9: Protection of California Red-legged Frogs from Herbicide Use (VMP BMP BIO-2)	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>BIO-10: Minimize Impacts to Nesting Birds via Site Assessments and Avoidance Measures (revised from VMP BMP BIO-1)</p> <p>BIO-11: Protection of Bat Colonies (VMP BMP BIO-8)</p> <p>BIO-12: Protection of Dusky-footed Woodrats (VMP BMP BIO-9)</p> <p>BIO-13: Avoid Riparian Habitat and Develop and Implement a Plan to Replace Affected Riparian Habitat</p> <p>BIO-14: Prevent the Spread of Invasive Plants and Plant Pathogens</p> <p>BIO-15: Avoid Impacts on Federally Protected and State-Protected Wetlands and Waters, as Feasible</p> <p>BIO-16: Provide Compensatory Mitigation for Unavoidable Impacts on Waters of the United States and the State</p> <p>GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2)</p> <p>GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3)</p> <p>HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8)</p> <p>HAZ-2: Vehicle and Equipment Fueling (VMP BMP GEN-9)</p> <p>HAZ-3: On-Site Hazardous Materials Management (VMP BMP GEN-5)</p> <p>HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides</p> <p>HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)</p> <p>HAZ-6: Spill Prevention and Response (VMP BMP GEN-7)</p> <p>HAZ-8: Existing Hazardous Materials (VMP BMP GEN-6)</p> <p>HYD/WQ-1: Work Windows (VMP BMP GEN-1)</p>	
Herbicides	LTS	None required	LTS

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
BIO-7: Conflict with the Provisions of an Adopted Habitat Conservation Plan, Natural Community Conservation Plan, or Other Approved Local, Regional, or State Habitat Conservation Plan	NI	None required	NI
<i>Cultural Resources</i>			
CUL-1: Adverse Change in Significance of Historical Resources of the Historic Era and Built Environment	LTS	None required	LTS
CUL-2: Adverse Change in Significance of Archaeological Sites that Are Historical Resources	S	CUL-1: Provide Sensitivity Training, Assess Archaeological Sensitivity, and Survey Areas of High or Highest Sensitivity CUL-2: Avoid Use of Techniques that Cause Ground Disturbance within Known Archaeological Historical Resources CUL-3: Response Measures for Potential Unknown Archaeological Resources and Tribal Cultural Resources	LSM
CUL-3: Disturb Human Remains, Including Those Interred Outside of Dedicated Cemeteries	S	CUL-4: Stop Work if Human Remains Are Unearthed during Project Activities	LSM
<i>Geology, Soils, and Seismicity</i>			
GEO-1: Result in Substantial Erosion or Loss of Topsoil	S		LSM
Grazing	S	BIO-5: Grazing (revised from VMP BMP BIO-6)	LSM
Mechanical Treatments	S	AES-2: Staging (VMP BMP GEN-4) GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2) GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3)	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		GEO-3: Geotechnical Evaluation HYD/WQ-1: Work Windows (VMP BMP GEN-1)	
Hand Labor Treatments	S	GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2) GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3)	LSM
Herbicides	LTS	None required	LTS
GEO-2: Substantial Adverse Effects Involving Landslides	S		LSM
Grazing	S	BIO-5: Grazing (revised from VMP BMP BIO-6)	LSM
Hand Labor Treatment	LTS	None required	LTS
Mechanical Treatments	S	AES-2: Staging (VMP BMP GEN-4) GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2) GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3) GEO-3: Geotechnical Evaluation	LSM
Herbicides	LTS	None required	LTS
GEO-3: Directly or Indirectly Destroy a Unique Paleontological Resource or Site or Unique Geologic Feature	S	GEO-4: Stop Work if Paleontological Resources Are Unearthed during VMP Treatment Activities	LSM
<i>Greenhouse Gas Emissions</i>			
GHG-1: Generate GHG Emissions	LTS	None required	LTS
GHG-2: Potential to Conflict with an Applicable Plan, Policy or Regulation Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	None required	LTS

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
GHG-3: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources or Conflict with a State or Local Plan for Renewable Energy or Energy Efficiency	S	AQ-1: Fugitive Dust BMPs	LSM
GHG-4: Reduction in Carbon Sequestration	LTS	None required	LTS
<i>Hazards and Hazardous Materials</i>			
HAZ-1: Create a Significant Hazard to the Public or the Environment from the Routine Transport, Use, or Disposal of Hazardous Materials	S		LSM
Grazing	S	HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8) HAZ-2: Vehicle and Equipment Fueling (VMP BMP GEN-9)	LSM
Hand Labor Techniques	S	HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8) HAZ-2: Vehicle and Equipment Fueling (VMP BMP GEN-9)	LSM
Mechanical Techniques	S	HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8) HAZ-2: Vehicle and Equipment Fueling (VMP BMP GEN-9) HAZ-3: On-Site Hazardous Materials Management (VMP BMP GEN-5)	LSM
Herbicides	S	HAZ-3: On-Site Hazardous Materials Management (VMP BMP GEN-5) HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p>HAZ-2: Create a Significant Hazard to the Public or the Environment through the Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials into the Environment</p>	S	<p>HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8) HAZ-2: Vehicle and Equipment Fueling (VMP BMP GEN-9) HAZ-3: On-Site Hazardous Materials Management (VMP BMP GEN-5) HAZ-6: Spill Prevention and Response (VMP BMP GEN-7)</p>	LSM
<p>HAZ-3: Create a Significant Hazard to the Public through the Storage or Use of Acutely Hazardous Materials near Sensitive Receptors</p>	S	<p>HAZ-3: On-Site Hazardous Materials Management (VMP BMP GEN-5) HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)</p>	LSM
<p>HAZ-4: Emit Hazardous Emissions or Handle Hazardous or Acutely Hazardous Materials, Substances, or Wastes within 0.25 Mile of an Existing or Proposed School</p>	S	<p>HAZ-4: Measures to Avoid or Minimize Adverse Effects on People, Pets, or Other Non-Target Organisms from Use of Herbicides HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2)</p>	LSM
<p>HAZ-5: Be Located on a Site that Is Included on a List of Hazardous Materials Sites Compiled Pursuant to California Government Code Section 65962.5, and as a Result, Create a Significant Hazard to the Public or the Environment</p>	S	<p>HAZ-7: Review Proximity of Proposed Treatment Sites to Known Hazardous Materials Clean-up Sites and Implement Safety Measures HAZ-8: Existing Hazardous Materials (VMP BMP GEN-6) HAZ-9: Proper Handling and Disposal of Contaminated Soil and Groundwater</p>	LSM
<p>HAZ-6: Impair Implementation of or Physically Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan</p>	S	<p>TRA-1: Maintain Traffic Flow TRA-2: Traffic Control and Public Safety</p>	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<i>Hydrology and Water Quality</i>			
<p>HYD/WQ-1: Violate Water Quality Standards or Waste Discharge Requirements or Otherwise Substantially Degrade Water Quality or Conflict with or Obstruct the Implementation of a Water Quality Control Plan or Conflict with the City of Oakland Creek Protection Ordinance through Hand Labor, Herbicide Application, or Mechanical Techniques</p>	S	<p>HYD/WQ-1: Work Windows (VMP BMP GEN-1) GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2) GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3) HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8) HAZ-2: Vehicle and Equipment Fueling (VMP BMP GEN-9) HAZ-3: On-Site Hazardous Materials Management (VMP BMP GEN-5) HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2) HAZ-6: Spill Prevention and Response (VMP BMP GEN-7) HAZ-8: Existing Hazardous Materials (VMP BMP GEN-6)</p>	LSM
<p>HYD/WQ-2: Violate Water Quality Standards or Waste Discharge Requirement or Otherwise Substantially Degrade Water Quality or Conflict with or Obstruct the Implementation of a Water Quality Control Plan or Conflict with the City of Oakland Creek Protection Ordinance through Grazing</p>	S	<p>BIO-5: Grazing (revised from VMP BMP BIO-6) GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2) GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3)</p>	LSM
<p>HYD/WQ-3: Substantially Alter Existing Drainage Pattern of Site or Area, or Create or Contribute Runoff Water that Exceeds Capacity of Stormwater Systems, or Results in Substantial Erosion or Exposes People or Structures to a Substantial Risk of Loss, Injury, or Death as a Result of Flooding or Inundation by Mudflow</p>	S	<p>BIO-5: Grazing (revised from VMP BMP BIO-6) HYD/WQ-1: Work Windows (VMP BMP GEN-1) GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2) GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3) HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8) HAZ-2: Vehicle and Equipment Fueling (VMP BMP GEN-9)</p>	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		HAZ-3: On-Site Hazardous Materials Management (VMP BMP GEN-5) HAZ-5: Standard Herbicide Use Requirements (VMP BMP VEG-2) HAZ-6: Spill Prevention and Response (VMP BMP GEN-7) HAZ-8: Existing Hazardous Materials (VMP BMP GEN-6)	
HYD/WQ-4: Substantially Decrease Groundwater Supplies or Interfere with Groundwater Recharge Such That There Would Be a Net Deficit in Aquifer Volume or a Lowering of the Local Groundwater Table Level	LTS	None required	LTS
<i>Noise</i>			
NOI-1: Generate Substantial Temporary or Periodic Increase in Ambient Noise Levels; or Generate Noise in Violation of the City of Oakland Municipal Code, in Excess of General Plan Standards, California Noise Insulation Standards, or Applicable Standards Established by a Regulatory Agency			
Grazing and Herbicide Treatments	LTS	None required	LTS
Hand Labor Treatments	S	NOI-1: Limit Work Near Sensitive Receptors NOI-2: Notify Sensitive Receptors Near Treatment Areas	SU
Mechanical Treatments	S	NOI-1: Limit Work Near Sensitive Receptors NOI-2: Notify Sensitive Receptors Near Treatment Areas	SU

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOI-2: Generate Groundborne Vibration or Groundborne Vibration Levels that Exceed FTA Criteria	LTS	None required	LTS
<i>Recreation</i>			
REC-1: Increased Use of Recreational Facilities Such that Substantial Physical Deterioration Would Occur	LTS	None required	LTS
REC-2: Temporary Disruption of the Use of, or Access to, Recreational Facilities	S	REC-1: Provide Notification of Temporary Trail Closures	LSM
<i>Transportation</i>			
TRA-1: Conflict with a Program Applicable Plan, Ordinance or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle and Pedestrian Facilities			
Roadside Treatment Areas and Medians	S	TRA-1: Maintain Traffic Flow TRA-2: Traffic Control and Public Safety	LSM
Ridgetop Areas	S	TRA-1: Maintain Traffic Flow TRA-2: Traffic Control and Public Safety	LSM
Canyon Areas	S	TRA-1: Maintain Traffic Flow TRA-2: Traffic Control and Public Safety	LSM
City Parks and Open Space Areas	S	TRA-1: Maintain Traffic Flow TRA-2: Traffic Control and Public Safety	LSM
Urban and Residential Parcels	LTS	None required	LTS
Other Areas	LTS	None required	LTS

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
TRA-2: Result in Substantial Increase in Vehicle Miles Traveled	LTS	None required	LTS
TRA-3: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	S	TRA-1: Maintain Traffic Flow TRA-2: Traffic Control and Public Safety	LSM
TRA-4: Result in Inadequate Emergency Access	S	TRA-1: Maintain Traffic Flow TRA-2: Traffic Control and Public Safety	LSM
<i>Tribal Cultural Resources</i>			
TCR-1: Substantial Adverse Change in the Significance of a Tribal Cultural Resource	S	CUL-1: Provide Sensitivity Training, Assess Archaeological Sensitivity, and Survey Areas of High or Highest Sensitivity CUL-2: Avoid Use of Techniques that Cause Ground Disturbance within Known Archaeological Historical Resources CUL-3: Response Measures for Potential Unknown Archaeological Resources and Tribal Cultural Resources CUL-4: Stop Work if Human Remains Are Unearthed during Project Activities	LSM
<i>Wildfire</i>			
WLD-1: Substantially Exacerbate Wildfire Risk and Expose People to Uncontrolled Spread of a Wildfire	S	HAZ-1: Vehicle and Equipment Maintenance (VMP BMP GEN-8) WLD-1: Fire Prevention	LSM
WLD-2: Expose People or Structures to Substantial Risks Related to Post-Fire Landslides or Flooding			
Mechanical Treatments	S	GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2) GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3) GEO-3: Geotechnical Evaluation	LSM

Attachment C – Summary of Impacts Analysis and Mitigations (Table ES-2)

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Hand Labor Treatments	S	GEO-1: Minimize Soil Disturbance (VMP BMP GEN-2) GEO-2: Erosion and Sediment Control Measures (VMP BMP GEN-3)	LSM
Grazing	LTS	None required	LTS
Herbicides	LTS	None required	LTS
<i>Cumulative Impacts</i>			
Cum-BIO-1: Cumulative Effects on Biological Resources	S	BIO-1 through BIO-16	LSM
Cum-NOI-1: Cumulative Effects Related to Noise	S	NOI-1 and NOI-2	SU

Notes: LSM = less than significant with mitigation; LTS = less than significant; NI = no impact; S = significant; SU = significant and unavoidable

December 2, 2020

Location:	City-owned parcels and the areas within 30 feet of the edge of roadsides located within the City’s Very High Fire 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 Plan area includes: 422 City-owned parcels, ranging in size from <0.1 acres to 235 acres and totaling 1,924.9 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, and Sulfur Springs Park.
Proposal:	Staff informational report on the proposed Oakland Vegetation Management Plan (VMP). The Project is subject to CEQA and a Draft Environmental Impact Report (DEIR) is being prepared.
Applicant:	City of Oakland
Case File Number:	TBD
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)
Environmental Determination:	The Project is subject to the California Environmental Quality Act (CEQA) and a DEIR is being prepared, which will ultimately lead to a Final EIR (FEIR) with Response to Comments.
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 Draft VMP was released on November 1, 2019. A scoping session for the DEIR was conducted by the Planning Commission on November 20, 2019. The Draft EIR will be presented to the Planning Commission on December 16, 2020.
Action to be Taken:	Receive public and Planning Commission comments on the Draft VMP. No decisions will be made on the project at this hearing.
For Further Information:	Contact Angela Robinson Piñon at (510) 238-3707 or by email at arobinsonpinon@oaklandca.gov . Project website: www.oaklandca.gov/projects/oakland-vegetation-management-plan

SUMMARY

The purpose of this report is to provide an introduction and overview of the Draft Oakland Vegetation Management Plan (VMP or Draft Plan). A second Planning Commission hearing on December 16, 2020 will allow for further comment on the VMP as well as the Draft Environmental Impact Report (DEIR).

Please note that the Draft VMP was released on November 1, 2019. This meeting is intended to provide another opportunity for members of the public to provide input on the Draft VMP. Any revisions to the Draft VMP will be released in 2021 along with the Final EIR.

The Vegetation Management Plan (VMP) describes the actions that the Oakland Fire Department (OFD) will continue to take over the 10-year Plan timeframe to reduce fire hazard on 1,924 acres of City-owned land and along 308 miles of roadway in the City of Oakland's designated Very High Fire Hazard Severity Zone (VHFHSZ). The VMP has been developed to meet its stated goals of reducing wildfire hazard on City-owned land and along critical access/egress routes, reducing the likelihood of ignitions and extreme fire behavior to enhance public and firefighter safety, avoiding or minimizing impacts to natural resources, and contributing to regional efforts to reduce wildfire hazard in the Oakland Hills.

BACKGROUND

The Oakland Hills present a complex wildfire environment that presents a significant risk to public and firefighter safety and both the human-made and natural environment. This geographic area is one of the highest risk areas in the country for devastating wildland urban interface (WUI) fires and is the location of one of the state's most destructive historic wildfires, the 1991 Tunnel Fire. Lessons learned from this and more recent, devastating wildfires in Northern California highlight the importance of managing vegetation to reduce wildfire hazard.

Development of this Draft Plan included a detailed assessment of wildfire hazard, which was used to identify and map areas with high ignition potential or where extreme wildfire behavior would be expected, given current terrain and fuel conditions. Draft Plan development also included coordination with OFD personnel and significant public and stakeholder outreach to better understand current vegetation management activities in the Plan Area. Vegetation treatment projects were then identified and prioritized based on proximity to Plan Area structures, roads, ridgelines, and park access gates, where fire behavior is anticipated to be extreme (high flame lengths and/or crown fires), and where continuation of the City's goat grazing program would effectively maintain lower fuel loads. Identified priority projects total 1,366 acres within the Plan Area's 1,924 total acres. This Draft Plan also prioritizes vegetation management along 30 miles of primary access/egress routes in the Plan Area.

This Draft Plan also outlines measurable vegetation treatment standards, by dominant vegetation type, and identifies a range of vegetation management tools that can be utilized by OFD, or its contractors, to reach these treatment standards. As vegetation is dynamic in nature, this Draft Plan outlines an adaptive field assessment and work plan development process to be

implemented by OFD annually, which accounts for the variability in vegetation condition project site conditions over time.

PROJECT LOCATION

The areas included within the VMP encompass City-owned parcels and the areas within 30 feet of the edge of roadsides located within the City's Very High Wildfire Hazard Severity Zone (VHFHSZ) as designated by CAL FIRE, and defined in Section 4904.3 of the Oakland Fire Code (Oakland Municipal Code Chapter 15.12). Specifically, as shown in **Figure 1** (attached), the OVMP 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 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 VMP also includes roadside areas along 308 miles of road 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 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/fuel reduction will significantly reduce wildfire risk. The 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. Implementation of the VMP would involve thinning, pruning, removal, and otherwise modification of trees and vegetation within the 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 Draft Plan 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;
- Maintain an active role in regional efforts to reduce wildfire hazard in the Oakland Hills.

The goals, objectives, and recommendations identified in the VMP are based on a combination of evaluating existing field conditions and current vegetation and fire risk conditions at City

parcels. This analysis includes 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 VMP area that may present increased ignition potential or otherwise contribute to increase fire hazard; and receiving feedback and guidance from many stakeholders through various meetings, site visits, and written comments.

The VMP describes various vegetation management techniques that may be utilized 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 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 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 VMP area.

KEY ISSUES

Herbicide Use

In 2005, the City adopted Resolution No. 79133 C.M.S, which directed staff to evaluate the selective use of glyphosate and triclopyr for managing vegetation to reduce wildfire hazard in the City's Wildfire Prevention Assessment District. To date, herbicides have not been used for vegetation management on City-owned property or along roadsides in the VMP area. This VMP EIR process evaluates the potential environmental effects of herbicide use. However, the City also received feedback from the public during the VMP development and scoping process to consider a "no herbicide" alternative to address concerns about the potential impacts of herbicide use in the City. The VMP includes several best management practices (BMPs) should the City move towards the use of herbicides. They may be found in Section 8.4 of the VMP. Additional BMPs are provided in Section 10.

The following BMPs should be implemented, where feasible, when utilizing chemical vegetation management techniques. In all circumstances, equipment should be utilized only for its intended use.

- OFD should consult with a state-licensed pest control advisor and/or the Alameda County agricultural commissioner to identify the appropriate site-specific herbicide application approach to meet vegetation management standards;
- The timing of herbicide applications should be considered to minimize impacts to adjacent retained vegetation and nearby resources (typically between June 15 and

November 15, with a potential extension through December 31 or until local rainfall greater than 0.5 inches is forecasted within a 24-hour period from planned application);

- Only herbicides and surfactants that have been approved for aquatic use by the U.S. Environmental Protection Agency and are registered for use by the California Department of Pesticide Regulation should be used for aquatic vegetation control work;
- Herbicide application should be consistent with Federal Insecticide, Fungicide, and Rodenticide Act label instructions and use conditions issued by the U.S. Environmental Protection Agency, California Department of Pesticide Regulation, and the Alameda County Agricultural Commissioner;
- The lowest recommended rate to achieve vegetation management objectives of both herbicides and surfactants should be utilized to achieve desired control;
- An indicator dye should be added to the tank mix to help the applicator identify areas that have been treated and better monitor the overall application;
- No application to plants whose base is submerged in stream channels should occur;
- Safe procedures for transporting, mixing, and loading herbicides should be followed; and
- The use of foliar (spray) applications should be minimized, prioritizing localized or direct applications.

Funding to Implement Draft Plan

Between 2004 and 2017, OFD conducted vegetation management activities throughout the Wildfire Prevention Assessment District (WPAD), a City-funded special assessment district that coincides with the City's VHFHSZ. This district financed the costs and expenses related to vegetation management, yard waste disposal, wildfire prevention education, and fire patrols in the Oakland Hills. The WPAD was disbanded in June 2017. Although OFD has continued to conduct vegetation management activities on City-owned properties and along roads since 2017, due to funding constraints, these have been conducted to a lesser degree than when the WPAD was in place. Therefore, the City must identify additional funding sources in order to implement the VMP. The VMP does not provide any specific recommendations as to how the City should go about securing the levels of funding needed to implement the VMP, rather the Draft Plan includes estimates that can be used in calculating the costs associated with the VMP.

Removal of Trees and Non-Native Vegetation

Many residents and advocates were concerned about the removal of trees and non-native vegetation. Some were worried that far too many trees would be removed and of the potential environmental impacts associated with their removal, and others worried that not enough trees were being removed to meet the VMP wildfire risk reduction goals. Similarly, people were worried that not enough non-native species, particularly non-native trees, were identified for

removal, and as a result the City would not be able to meet the VMP's goals. While others stated that non-native species provide many benefits including use as animal habitat. The VMP was drafted with the intent of reducing wildfire hazards on City-owned property. The VMP also includes several BMPs to avoid or minimize potential impacts associated with vegetation treatment or removal. BMPs are identified in Chapters 8 and 10 of the VMP as well as Appendices I and J of the Draft Plan.

Minimization of Impacts on Sensitive Species

Several residents and advocates noted that the use of herbicides and the expanded removal of trees and vegetation would result in habitat loss and increased injury and mortality to sensitive species. The VMP has incorporated several BMPs to protect and to minimize impacts to special status wildlife and plant species. These BMPs are summarized in Sections 10.4 and 10.5 of the Draft VMP, and include the following:

- OFD's Draft Protected and Endangered Species Policy and Procedures document (Appendix J) establishes a uniform procedure for the protection of endangered or threatened species of flora while conducting vegetation management activities in the Plan Area. The Draft document (Appendix J) outlines policies to ensure that endangered plant species are protected during vegetation management activities.
- In order to minimize the potential for impacts to special-status wildlife species, the specific measures identified in Appendix I (Best Management Practices for General Operations, Vegetation Management, and Protection of Biological Resources) should be implemented, depending on wildlife species present in the identified treatment area.

Coordination with Stakeholder and Volunteer Groups

As the VMP was being drafted, several members of the public emphasized the important role of stakeholder and volunteer groups in the area. Outreach to stakeholder and volunteer groups was conducted during the VMP development, as summarized in Section 6. Volunteers and stakeholder groups that provided input during the VMP development process are identified in Appendix K. This Draft Plan recommends continued and on-going coordination between OFD and local volunteer and stewardship groups that are active in parklands or other areas within the VMP. The following communication protocols may be found in Section 11.2, "Coordination with Stakeholder and Volunteer Groups" and are recommended to help keep OFD and local stewardship efforts coordinated.

- OFD shall identify a point-of-contact for communication and coordination purposes with local park stewardship groups. The Vegetation Management Unit of the Fire Prevention Bureau of OFD will be responsible for this outreach, and can be contacted at 510-238-7388 or wildfireprevention@oaklandca.gov. Similarly, each park stewardship group will identify a point-of-contact for coordination with OFD. OFD will maintain an updated list of the points-of-contact, including names, telephone numbers, and email addresses. If there is a change in status regarding the point-of-contact for either the OFD or the local stewardship groups, it is their responsibility to contact OFD to update the contact list.

- During the annual work plan development process, the OFD will reach out to the local park stewardship groups (though the point-of-contact) to solicit input or feedback on current vegetation management needs in the specific park, potential treatment options, treatment timing, local site conditions, and previous vegetation management efforts conducted on site. This coordination is especially important when a new contractor is selected to conduct vegetation management within a park. Coordination with the park stewardship group may include a site visit with OFD and/or the new vegetation management contractor.
- When the OFD has a clearer understanding of when vegetation management work will be performed in a specific park(s), they will provide this schedule update to the identified point-of-contact for that park(s).
- Similarly, volunteer/park stewardship groups must contact OFD prior to implementing vegetation management actions in the Plan Area. Key things for local stewards to update the OFD on include the location and extent of planned steward actions. This is an important step to minimize the potential for steward projects to potentially conflict with City plans or goals for vegetation management.

PLAN OVERVIEW

Plan Scope and Timeframe

The timeframe for 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 Plan Area's wildfire hazard conditions and the success of vegetation management actions implemented over the 10-year VMP timeframe. Following such a subsequent review, revisions to VMP goals, objectives, methods, or recommendations may be necessary to reflect wildfire hazard conditions within the Plan Area at a later time.

Summary of Draft Plan and Hazard Assessment Methodology

Development of this VMP included an assessment of wildfire hazard within the Plan Area and an evaluation of variables that contribute to wildfire risk. The following components comprise the hazard assessment methodology conducted for this VMP:

- **Field Assessments:** Conducted to identify vegetative communities and land cover types, fuel characteristics, fuel models, terrain, and hazard conditions in the Plan Area.
- **Geographic Information Systems (GIS) Analysis:** Conducted to evaluate conditions in the Plan Area, including terrain, vegetative cover, land ownership, City-owned parcel distribution, the area of land within 100 and 300 feet of existing structures, the area of land within 150 feet of park access gates, the area of land within 300 feet of ridgelines, and the extent and distances of Plan Area roads.

- Fire Behavior Modeling: Conducted in a GIS for selected larger parcels to identify areas that may be subject to extreme fire behavior, considering weather, fuels, and terrain variables.
- Research and Community Input: Research was conducted to document existing vegetation management practices used by OFD and to identify areas subject to high ignition potential. Input from the public on specific fire hazards and high ignition areas was also included. Research was also conducted to evaluate potential costs associated with implementation and maintenance of areas recommended for management under this OVMP.

This assessment allowed for the prioritization of vegetation treatment areas within the Plan Area, which was based on several factors, including proximity to structures (e.g., WUI), ridgelines, and access gates, areas along critical access/egress routes, areas subject to increased ignition potential, and areas that exhibit the potential for extreme fire behavior. A more detailed discussion of the methodology is presented in Section 3.

Plan Background

The Oakland Hills is the location of one of the state's most destructive historic wildfires, the 1991 Tunnel Fire, which destroyed 2,900 structures, injured more than 150 people, and killed 25 people. The Oakland Hills represents a complex wildfire environment that presents a significant risk to public and firefighter safety and to the built and natural environment due to local extreme wind and weather conditions (including Diablo wind events), steep and varied terrain, and a wide range of different vegetation types. Of the variables that comprise the wildland fire environment (weather, terrain, and fuels or vegetation), vegetation is the only variable that can be managed. Lessons learned from the 1991 Tunnel Fire and other more recent, devastating wildfires in Northern California highlight the importance of managing vegetation to reduce wildfire hazard. The City, in close coordination with OFD, developed the VMP to reduce fire hazards on City-owned land and critical access/egress routes in City-designated VHFHSZ areas, reduce the likelihood of ignitions and extreme fire behavior to enhance public and firefighter safety, avoid or minimize impacts to natural resources, and contribute to regional efforts to reduce wildfire hazard in the Oakland Hills. The Draft VMP (provided in Appendix A) includes descriptions of City-owned parcels and roadsides located within the City's VHFHSZ, natural resources at these locations, vegetation management techniques to reduce fire hazards, maintenance standards for the different types of treatment areas, and practices to avoid and minimize potential environmental impacts when conducting vegetation management work.

Draft Plan Development Process

Development of the VMP included a detailed field assessment of wildfire hazard, which was used to identify and classify existing vegetation community and land cover types into fuel models, and map areas with high ignition potential or where extreme wildfire behavior would be expected given current terrain and fuel conditions. VMP development also included assessment and processing of geographic information system (GIS) datasets for variables influencing wildfire hazard in the VMP area, coordination with OFD personnel, fire behavior modeling, and

significant public and stakeholder outreach to better understand current vegetation management activities in the VMP area.

Tasks/Deliverables Completed to Date

This section provides a brief summary of task/deliverables completed to date on the Draft Plan.

- In June 2016, the Oakland Council approved Resolution No. 86311 C.M.S authorizing the City Administrator, or designee, to negotiate a contract and scope of work with Horizon Water and Environment, LLC (“Horizon”) for the preparation of a vegetation management plan and environmental analysis of the plan as required under the California Environmental Quality Act (CEQA).
- A contract was executed with Horizon in November 2016.
- A kick-off meeting was held with City staff and members of the former Wildfire Prevention Assessment District (WPAD) in January 2017.
- Plan Website was launched in February 2017.
- Public Workshops were held on March 29 and 30, 2017 and June 29, 2017.
- Draft Plan provided to City staff for review in December 2017.
- The Draft Plan was released for public review on May 11, 2018.
- A public meeting coinciding with the Draft Plan’s comment period, was held on May 23, 2018.
- Councilmember Dan Kalb submitted a Rules/Legislation Request that OFD present the item at a Public Safety Committee meeting on July 17, 2018.
- OFD presented the item to the Public Safety Committee; a summary of the meeting is provided in the section entitled “July 17, 2018 Public Safety Committee Meeting” (Attachment B).
- Public meetings were held on November 15, 2018 and November 20, 2018. The results of these additional stakeholder meetings will be included in the Revised Draft Plan as a “Comment Summary Matrix”.
- In March, April, and May 2019, the project consultant and City staff began conducting site visits at City parks and open space with volunteer organizations to meet and discuss treatment options for the area.
- Assembly Bill (AB) 52 Consultations with Native American Tribes occurred as required.
- Internal review of the Revised Draft Plan in Summer 2019.
- Revised Draft Plan released to public on November 1, 2019.
- Notice of Preparation for the EIR was released on Friday, November 1, 2019. (Attachment A)
- Scoping/comment period was from November 1, 2019 to December 2, 2019.
- On November 12, 2019, a revised NOP was released correcting staff contact information on the initial NOP; the publication of the second NOP extended the public comment period to December 12, 2019.
- Oakland Planning Commission hosted CEQA Scoping Meeting on November 20, 2019.
- Oakland Planning Commission CEQA Scoping Meeting on November 20, 2019. Staff received comments on the Draft VMP and the scope of the EIR.
- Oakland City Council Public Safety Committee Meeting on December 3, 2019. Staff received comments on the Draft VMP and the scope of the EIR.

- Notice of Availability of the Draft EIR was released on November 24, 2020.
- The Draft EIR was released on November 24, 2020
- Staff to present the Draft Plan and DEIR at the Oakland Planning Commission and City Council Public Safety Committee.
- The 45-day comment period closes on January 7, 2021.

Responses to the Draft Plan, May 2018: The Consultant released the Draft Plan for public review on May 11, 2018 and received approximately one hundred and sixty-five (165) comment letters. Some general themes were observed in the comments including the following:

- The Draft Plan should include a description of the role of volunteers and stewardship groups that actively maintain vegetation at various City-managed parks/open space areas.
- The Draft Plan should include more site-specific vegetation management recommendations at each City-managed parcel.
- The Draft Plan should include cost estimates, or a range of potential costs, for the recommended treatments to assist the City for longer-term budgeting and planning purposes. The cost estimates and site-specific plans for City-managed parks would also help identify activities that volunteers can conduct.

July 17, 2018 Public Safety Committee Meeting: At their meeting on July 17, 2018, the Oakland City Council Public Safety Committee heard a report from the Oakland Fire Department (OFD) regarding the Oakland Vegetation Management Plan (“Draft Plan”). There were eleven (11) speakers on the item. The Committee requested that staff do the following:

- Host additional meetings for the public and members of parks stewardship volunteer groups to provide input on the Draft Plan that was released in May 2018.
- Provide more specificity on the costs of implementing the Draft Plan.
- Clarify how, or if, herbicides will be used.
- Augment the consultant’s budget (Horizon Water and Environment, LLC) as needed to carry out the tasks specified above.

Public Engagement

Several public and stakeholder engagement meetings were conducted to support development of the VMP. Six workshops/meetings and a presentation before the Oakland City Council Public Safety Committee were conducted during development of the Draft VMP, as summarized below:

- March 29, 2017: Dunsmuir Estate – workshop to introduce the scope and purpose of the VMP and receive public input and feedback
- March 30, 2017: Trudeau Center – workshop to introduce the scope and purpose of the VMP and receive public input and feedback

- June 29, 2017: Trudeau Center – workshop to provide an update on the VMP development process and receive public input and feedback
- May 23, 2018: Oakland City Hall – workshop to present the First Draft VMP and receive public input and feedback
- A status update was provided to the Oakland City Council Public Safety Committee on July 17, 2018. As an outcome of that meeting and per direction from the Council, two additional public meetings were held in November 2018.
- November 15, 2018: Trudeau Center – workshop to receive input from the public, which was targeted towards the park steward/volunteer groups working on City-owned parcels.
- November 20, 2018: Oakland City Hall – workshop to receive input from the public, which was focused on increased specificity of the VMP.

In addition to the above-listed public meetings, the VMP development team conducted additional outreach to park volunteer/stewardship groups to receive information on current activities being conducted in City parks that occur in the VMP area with the intent of incorporating volunteer/stakeholder input into annual vegetation management planning efforts described in the VMP. In total, 10 additional group meetings were held between March and May 2019 with stakeholders interested in the VMP. A summary of park volunteer/stewardship/stakeholder group meetings held in 2019 is summarized below:

- March 22, 2019: Friends of Dimond Park and Knowland Park Adopt-a-Spot. Reviewed site conditions and management recommendations in Dimond Park. Also reviewed site conditions and management recommendations in the northeast portion of Knowland Park and along the frontage road that parallels Skyline Boulevard.
- March 23, 2019: Oakland Landscape Committee. Reviewed site conditions and management recommendations at the North Oakland Regional Sports Field.
- March 29, 2019: Friends of Joaquin Miller Park and Friends of Sausal Creek. Reviewed site conditions and management recommendations at Beaconsfield Canyon and Joaquin Miller Park.
- April 5, 2019: Garber Park Stewards and Claremont Canyon Conservancy. Reviewed site conditions and management recommendations at Garber Park.
- April 6, 2019: Friends of Sausal Creek. Reviewed site conditions and management recommendations at Dimond Canyon and Dimond Park.
- April 12, 2019: Friends and Knowland Park and East Bay Native Plant Society. Reviewed site conditions and management recommendations at Knowland Park.
- April 18, 2019: Friends of Montclair Railroad Trail. Reviewed site conditions and management recommendations at the Montclair Railroad Trail in Shepherd Canyon.

- May 1, 2019: Oak Knoll Neighborhood Improvement Association. Reviewed site conditions and management recommendations at King Estate Open Space Park.
- May 3, 2019: Shepherd Canyon Homeowners Association. Reviewed site conditions and management recommendations at Shepherd Canyon Park.
- May 17, 2019: Coalition to Defend East Bay Forests, Forest Action Brigade, and Hills Conservation Network. Reviewed management recommendations throughout the Plan Area.

The comments received from these meetings were used to prepare a Revised Draft VMP that was released on November 1, 2019. Comments on the Revised Draft VMP were also received during the EIR Scoping Session before the City of Oakland Planning Commission on November 20, 2019 and during the Oakland City Council Public Safety Committee Meeting on December 3, 2019.

Revisions to the Draft Plan

In collaboration with various local stakeholder groups described in the “Public Engagement” portion of this report, and in response to comments provided following release of the first draft of the VMP in May 2018, the public comments and direction received during the July 2018 Public Safety Committee meeting, and subsequent consultation with volunteer and stakeholder groups, the Draft Plan was substantially revised. The revised Draft was released on November 1, 2019. The current text of the Draft Plan may be accessed here: https://cao-94612.s3.amazonaws.com/documents/Oakland-VMP_Revised-Draft_NOV-1-2019.pdf.

As with any document pending CEQA analysis, it should be noted that the Draft Plan remains in draft form until Council votes to adopt the Draft Plan. Additional revisions are possible up until the point of adoption. Staff will work with the consultant to revise the Draft Plan as needed pending feedback received during the DEIR comment period. The Final Draft VMP will be published along with the Final EIR in the first quarter of 2021.

Development of Vegetation Treatment Projects

Based on coordination with OFD personnel, fire behavior modeling, and public input received throughout the VMP development process, vegetation treatment projects were identified and prioritized based on proximity to VMP area structures, roads, ridgelines, and park access gates where fire behavior is anticipated to be extreme (high flame lengths and/or crown fires), and where continuation of the City’s goat grazing program would effectively maintain lower fuel loads. Identified priority projects total 1,366 acres within the VMP area’s 1,924 total acres. The VMP also prioritizes vegetation management along 30 miles of primary access/egress routes in the VMP area. VMP treatment areas and priority rankings are described in Sections 2.4.4 and 2.4.5, of the DEIR.

Plan Structure and Organization

This Draft Plan can be read in a linear fashion, from beginning to end. However, the user of this Draft Plan will find that they will have to actively cross-reference between the sections of the Draft Plan to better understand site-specific recommendations.

Sections 2 and 3 provide a description of the Plan Area and the methodology for the wildfire hazard assessment, respectively.

Section 4 describes existing codes and standards relevant to vegetation management activity in the Plan Area or the City's VHFHSZ.

Section 5 describes existing land or resource management plans and programs relevant to vegetation management activity in the Plan Area or the City's VHFHSZ, which were consulted during VMP development.

Section 6 describes the public and stakeholder engagement effort conducted during Draft Plan development and revision.

Section 7 summarizes biological, ecological, and community resources found in the Plan Area.

Description of vegetation management techniques is provided in Section 8, along with best management practices for each technique. For example, hand labor techniques will include line trimming, branch pruning/removal, and hand pulling. Best management practices for hand labor techniques include proper training in equipment use, pruning according to International Society of Arboriculture and American National Standards Institute A300 standards, and protecting retained trees and vegetation from tool and equipment damage.

Section 9 outlines vegetation management and maintenance standards, specific recommendations for key areas, and the procedures for identifying and planning annual vegetation treatment operations. Section 9.1 covers management and maintenance standards by dominant vegetation type. For example, maintenance standards for grassland/herbaceous vegetation (grasses; other light, flashy fuels; and surface fuels capable of igniting and carrying fire) are intended to reduce vegetation height (e.g., mowing, grazing) resulting in a shorter and more compact surface fuel layer that is less ignitable and less likely to sustain fire spread. Standards for grassland/herbaceous vegetation include treatment to heights not to exceed 3 inches within 30 feet of a habitable structure. Beyond 30 feet from a habitable structure, grasses, weeds, and thistles shall be treated such that heights do not exceed 18 inches, but it is recommended to cut grasses below 6 inches in height.

Section 9.2 describes current vegetation management practices, and specific recommendations for key areas based on site-specific conditions. For example, current vegetation management in Joaquin Miller Park includes treatment of roadside areas and goat grazing in grassland and disturbed areas. Specific high priority Plan recommendations for Joaquin Miller Park include management of vegetation within 100 feet of structures, within 300 feet of ridgelines, within 150 feet of park access gates, and within 30 feet of known human congregation areas along Skyline

Boulevard. If vegetation in these areas is grassland/herbaceous, it would be managed to meet the vegetation management standards outlined above.

Section 9.3 lists the procedures for identifying and planning annual vegetation treatment operations. This includes field assessment of vegetation conditions, treatment timing, treatment prioritization (Priority 1, 2, or 3), and treatment technique selection. This will be captured in annual vegetation management work plans developed by OFD. For example, vegetation management for Joaquin Miller Park identified in the annual work plan would identify vegetation treatment types, area to be treated, implementation timing, resource needs and availability, funding sources, and monitoring and tracking needs.

The vegetation treatment techniques presented in Section 8 are the practices and actions used to modify or remove vegetation, while the vegetation management and maintenance standards presented in Section 9 are the measurable guidelines to achieve the desired vegetation condition to reduce fire hazard. For example, management of grassland in Joaquin Miller Park to the treatment standards outlined above could be accomplished using any of the techniques described in the Plan, such as line trimming, grazing, or mowing.

Section 10 outlines additional best management practices (BMPs) intended to avoid or minimize potential impacts associated with vegetation treatment or removal. For example, as Joaquin Miller Park contains a population of the federally threatened and state endangered species pallid manzanita, measures to protect this species would include identifying locations where this species exists, flagging avoidance areas, and notifying contractors of avoidance areas during the contract bid phase.

Section 11 describes OFD partnerships in reducing fire hazards both on City property and regionally in the Oakland Hills, including other City departments, other large landowners and land managers, and stakeholder and volunteer groups. Volunteer and stewardship groups have been active participants in vegetation management activities in the Plan Area for many years. This VMP recognizes their important role in vegetation management in the Plan Area, and their role is described in detail in Section 11.2.

Section 12 outlines the methods for implementing the vegetation management recommendations included in this VMP over the 10-year plan timeframe, including annual reporting metrics and documentation for VMP implementation performance.

In summary, Sections 1 through 7 provide important background, context, and setting information to understand the Plan activities. Sections 8 through 12 provide the more specific actions and recommendations of the Draft Plan. Sections 8 through 12 generally require an iterative approach when considering what vegetation management actions to take, including selecting practices (Section 8), determining the criteria or guidelines to implementing those practices most effectively (Section 9), identifying applicable BMPs (Section 10), planning and coordinating with other partners (Section 11), and considering the steps to implement the plan activities (Section 12).

GENERAL PLAN

The General Plan's Open Space Conservation and Recreation Element (OSCAR) classifies the project areas as Urban Park or Resource Conservation Area. The "Urban Park" land use classification is intended to recognize and preserve areas of the City that "accommodate athletic fields, playgrounds, swimming pools, basketball courts, picnic areas, performance spaces, and even golf courses and a zoo". The purpose of the "Resource Conservation Area" designation is to identify and conserve existing areas in Oakland that have "high natural resource value, scenic value, or natural hazards".

The Land Use and Transportation Element (LUTE) classifies the roadways as local streets, collector streets, arterial streets, and freeways. "Local streets" provide "access to abutting property in residential neighborhoods and business districts and delivering traffic to and from the collector street system." "Collector streets" are designed to "move traffic between local streets and the arterial street system and carry trips within and between neighborhoods." "Arterial streets" provide the "basic network for the through-traffic between different sections of the city". "Arterial streets" range in size from two to six lanes. The California Department of Transportation (Caltrans) is responsible for six freeways in the City of Oakland. Three of the six freeways, State Routes 13 and 24, and Interstate 580, are within the VMP area.

ZONING DISTRICT

The parks, recreational and open space areas discussed in the 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, Joaquin Miller Park, Tunnel Road Open Space, and Sulfur Springs Park. These parks identified above have the following zoning designations: OS (LP), Open Space-Linear Park; OS (NP), Open Space-Neighborhood Park; OS (RSP), Open Space-Region Serving Park; OS (RCA), Open Space-Resource Conservation Area; OS (AF), Open Space-Athletic Field; OS (AMP), Open Space-Active Mini Park; and OS (SU), Open Space-Special Use Park.

CONCLUSION

The Planning Commission is being asked to provide feedback to City staff on the Draft VMP. Feedback received at this meeting will inform the development of the Final VMP. The Draft EIR will be presented to the Planning Commission at its December 16, 2020 meeting for feedback as part of the required 45-day public review period. The DEIR is available on the City's website at: www.oaklandca.gov/projects/oakland-vegetation-management-plan. Written comments may be submitted via email at: DEIR-comments@oaklandvegmanagement.org. Comments may also be submitted via mail to the following address: Horizon Water and Environment, LLC, Attn: Ken Schwarz, Principal, VMP ADEIR Comments, 266 Grand Avenue, Suite 2010, Oakland, CA 94610.

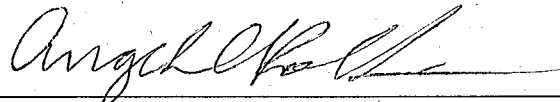
After the conclusion of the comment period, City staff and the consultant team will integrate public feedback on the Draft VMP and DEIR. Then the formal adoption process, with the FEIR (including responses to DEIR comments), and EIR certification process will commence. The process will begin with the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

Action	Hearing Body/Responsible	Date (if known)
Draft EIR Comment Period	Stakeholders and Interested Parties	November 24, 2020 – January 7, 2021
Review Draft EIR	Planning Commission	December 16, 2020
Prepare Final EIR and Revise VMP	City Staff and Consultant Team	January 2021 – February 2021
Release Final EIR	City Staff and Consultant Team	March 2021
Review Final EIR and Revised VMP	Planning Commission	March 2021
Council Hearings on Final EIR and VMP	Oakland City Council	March – April 2021
Notice of Determination Filed	City Staff and Consultant Team	April 2021

RECOMMENDATION:

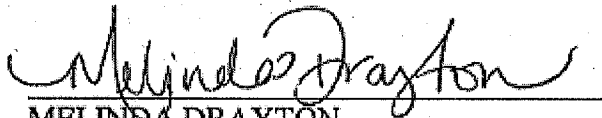
1. Take public testimony on the Draft VMP
2. Provide comments to staff on the Draft VMP

Prepared by:



Angela Robinson Piñon, Assistant Director
Bureau of Operations and Administration

Reviewed by:



MELINDA DRAYTON
Interim Fire Chief
Oakland Fire Department

Approved for Forwarding to the
City Planning Commission:



Ed Manasse, Deputy Director
Bureau of Planning

ATTACHMENTS:

- A. Notice of Availability (NOA), Corrected November 25, 2020 (<https://cao-94612.s3.amazonaws.com/documents/Corrected-OVMP-NOA-112520.pdf>)
- B. Draft Oakland Vegetation Management Plan, November 2019 (https://cao-94612.s3.amazonaws.com/documents/Oakland-VMP_Revised-Draft_NOV-1-2019.pdf)

**CORRECTED NOTICE OF AVAILABILITY (NOA) OF A DRAFT ENVIRONMENTAL
IMPACT REPORT (DEIR) FOR THE OAKLAND VEGETATION MANAGEMENT PLAN AND
NOTICE OF PUBLIC HEARING ON DEIR**

TO: All Interested Parties

SUBJECT: Correction to Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the Oakland Vegetation Management Plan (VMP) and Notice of Public Hearing on the same.

LEAD AGENCY/PROJECT SPONSOR: The City of Oakland

CEQA STATE CLEARINGHOUSE NUMBER: 2019110002

BRIEF SUMMARY OF CORRECTION: The City hereby submits this corrected NOA that corrects a typographical error in the email address for sending written comments on the DEIR. No other changes have been made to the NOA. As corrected below, written comments on the DEIR may be sent by e-mail to: DEIR-comments@oaklandvegmanagement.org. As set forth in both the original and this corrected NOA, written comments may also be submitted via mail at:

Horizon Water and Environment, LLC
Attn: Ken Schwarz, Principal, VMP DEIR Comments
266 Grand Avenue, Suite 210
Oakland, CA 94610

PROJECT LOCATION: The areas included within the VMP encompass City-owned parcels and the areas within 30 feet of the edge of roadsides located within the City's Very High Wildfire Hazard Severity Zone (VHFHSZ) as designated by CAL FIRE, and defined in Section 4904.3 of the Oakland Fire Code (Oakland Municipal Code Chapter 15.12). Specifically, as shown in **Figure 1** (attached), the 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 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 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 OVMP 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 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. Implementation of the VMP would involve thinning, pruning, removal, and otherwise modification of trees and vegetation within the 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 Plan 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;
- Maintain an active role in regional efforts to reduce wildfire hazard in the Oakland Hills.

The goals, objectives, and recommendations identified in the 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 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 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 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 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 VMP area.

PUBLIC REVIEW AND COMMENT PERIOD: The City invites comments on the Draft Vegetation Management Plan (VMP) and DEIR during a 45-day comment period that begins on November 24, 2020 and ends on January 7, 2021 at 5:00 PM. The City prefers that written comments be submitted via email at: DEIR-comments@oaklandvegmanagement.org. Please reference **VMP DEIR Comments** in all correspondence. Comments may also be submitted via mail to the following address:

Horizon Water and Environment, LLC
 Attn: Ken Schwarz, Principal, VMP DEIR Comments
 266 Grand Avenue, Suite 210
 Oakland, CA 94610

Comments will also be received at the public meetings to be held as noticed below. Written comments submitted via e-mail and mail can be provided no later than **January 7, 2021 at 5:00 PM.**

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

PUBLIC HEARINGS: In accordance with the revised Emergency Order No. 3 of the City of Oakland that was adopted due to the outbreak of COVID-19, meetings of the Oakland City Council and of the Planning Commission are being conducted online, rather than in person.

The City Planning Commission will conduct a public meeting on the DEIR for the project on **December 16, 2020 at 3:00 PM.**


For more information about how to participate in this meeting, please visit:
<https://www.oaklandca.gov/boards-commissions/planning-commission>

ENVIRONMENTAL REVIEW: A Draft Environmental Impact Report (DEIR) was prepared for the project under the requirements of the California Environmental Quality Act (CEQA), pursuant to the Public Resources Code Section 21000 *et. seq.* The DEIR analyzes potentially significant environmental impacts in the following categories: Aesthetics, Air Quality, Biological Resources, Cultural and Historic Resources (including Tribal Cultural Resources), Energy, Geology and Soils (including Geological and Seismic Hazards), Greenhouse Gas Emissions/Global Climate Change, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise and Vibration, Recreation, Transportation, and Wildfire. The DEIR identifies one significant and unavoidable environmental impact related to a temporary increase in noise levels that exceed local noise standards due to VMP activities.

The City of Oakland is hereby releasing this Draft Environmental Impact Report (DEIR), finding it to be accurate and complete and ready for public review. Members of the public are invited to comment on the DEIR and the project. There is no fee for commenting, and all comments received will be considered by the City prior to finalizing the DEIR and making a decision on the project. Comments on the DEIR should focus on the sufficiency of the DEIR in discussing possible impacts on the physical environment, ways in which potential adverse effects might be minimized, and alternatives to the project in light of the DEIR's purpose to provide useful and accurate information about such factors.

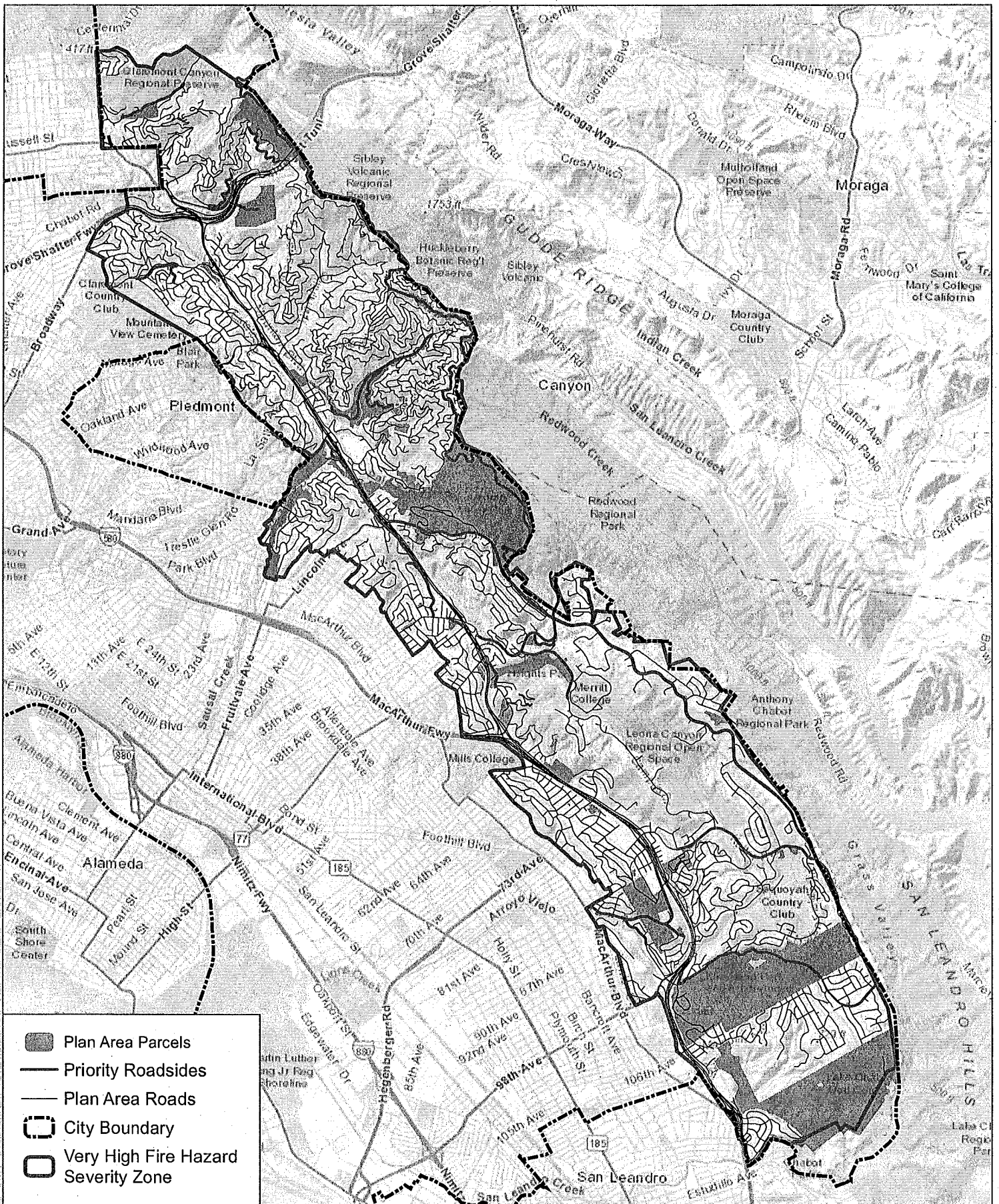
If you challenge the environmental document or project in court, you may be limited to raising only those issues raised at the hearings described above, or in written correspondence received on or prior to January 8, 2021 at 5:00 PM. Following the close of the public review period for the DEIR, the City will prepare a final EIR, incorporating and responding to all comments received during the public comment period, for consideration by the Planning Commission, at a date for which notice shall be provided. As required by CEQA (§21092.5), the final EIR, including written responses to the comments submitted by public agencies, will be provided to commenting agencies at least 10 days prior to certification. For further information, please contact Angela Robinson Piñon, at (510) 238-3707 or at arobinsonpinon@oaklandca.gov.

November 25, 2020


EDWARD MANASSE
City of Oakland
Environmental Review Officer

Attachment:

Figure 1, Location Map



SOURCE: ESRI 2017; City of Oakland 2017

FIGURE 1

Location Map

DUDEK  0 2,950 5,900 Feet