



2950 PERALTA OAKS COURT P.O. BOX 5381 OAKLAND CALIFORNIA 94605-0381
 T. 1 888 EBPARKS F. 510 569 4319 TDD. 510 633 0460 WWW.EBPARKS.ORG



BOARD EXECUTIVE COMMITTEE

Thursday, March 25, 2010
12:45 p.m., Board Room

The following agenda items are listed for Committee consideration. In accordance with the Board Operating Guidelines, no official action of the Board will be taken at this meeting; rather, the Committee's purpose shall be to review the listed items and to consider developing recommendations to the Board of Directors.

A copy of the background materials concerning these agenda items, including any material that may have been submitted less than 72 hours before the meeting, is available for inspection on the District's website (www.ebparks.org), the Headquarters reception desk, and at the meeting.

AGENDA

STATUS	TIME	ITEM	STAFF
R	12:45 pm	1. Request for Board Contingency Funding for Bay Area Storytelling Festival at Kennedy Grove Regional Recreation Area	Escobar/Kaiser
R	1:30 pm	2. Approval of Land Use Plan Amendment for Garin Regional Park	Breines
R	2:00 pm	3. Wildfire Hazard Reduction and Resource Management Plan, EIR, and Response to Comments	Wiese
		4. Public Comments	

- (R) Recommendation for Future Board Consideration
- (I) Information
- (D) Discussion

Executive Committee Members:

Doug Siden, Chair; Ted Radke; Beverly Lane
 Carol Severin, Alternate
 Pat O'Brien, Staff Coordinator

Future Meetings:

April 22	Aug. 26
May 27	Sept. 23
June 24	Oct. 28
July 22	Nov. 23

Distribution/Agenda

Ayn Wieskamp
 John Sutter
 Whitney Dotson
 Mike Anderson
 Tim Anderson
 Susan Gonzales
 Bob Doyle
 Ted Radosevich
 Carol Victor
 Erich Pfoehler
 Yolande Barial
 Bob Stagnaro

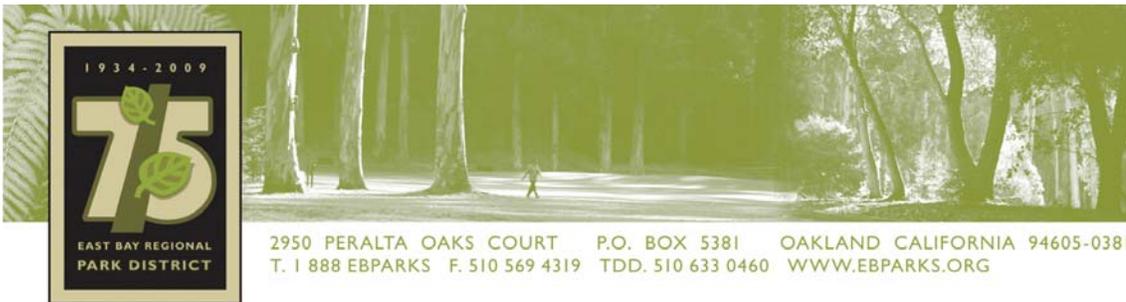
Bruce Beyaert
 Afton Crooks
 Ralph Kanz
 Michael Kelley
 Judi Bank
 Daniel Levy
 Sylvia Falcon
 Rich Guarienti
 Barry Weiss

Distribution/Full Packet

Carol Severin
 Doug Siden
 Ted Radke
 Beverly Lane
 Pat O'Brien
 John Escobar
 Dave Collins
 Allen Pulido
 Tyrone Davis – POA
 Dave Kalahale – Local 2428
 Kristin Vorderbrueggen – Local 2428
 Lobby/Receptionist

Norman LaForce

 Brian Wiese
 Ted Radosevich
 Nancy Kaiser
 Raphael Breines



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DATE: March 19, 2010

TO: Board Executive Committee

FROM: Pat O'Brien, General Manager

SUBJECT: Background Information for the March 25, 2010
Board Executive Committee Meeting

ITEM I: **Request for Board Contingency Funding for Bay Area Storytelling Festival at Kennedy Grove Regional Recreation Area**

Nancy Kaiser, Interpretive Services Manager, will make a presentation on this agenda item.

BACKGROUND

The Storytelling Association of California will present the 25th Annual Bay Area Storytelling Festival May 21-23, 2010 in Kennedy Grove Regional Recreation Area. This special event has been supported by the District since 1991 when the festival relocated to Kennedy Grove. The festival is a three day event featuring educational study trips for school children, recognition honors for storytellers, and public presentations and festival activities.

District staff works closely with the nonprofit organization's event planning committee to create a successful event. Nearly 25% of event participants are first-time visitors to Kennedy Grove. Elementary schools incorporate storytelling into reading and writing curriculum, and the "art of storytelling" adds to the diversity of experiences people find in their regional parks.

The Storytelling Association of California is developing strategies and plans for future festivals. The organization is experiencing financial challenges similar to many nonprofit organizations and local governments. Currently, the District supports the festival in the following manner:

- Waiver of the special event permit fee, facility use fees for Fern Cottage and all Kennedy Grove picnic areas, vendor fees, and sanitation trailer rental for three days;
- Fifteen parking passes for event volunteers;
- Use of the Tilden Nature Area on the evening of May 21, 2010;
- Use of 3 plywood stages stored at Kennedy Grove;

- Use of 20 tables and 10 chairs from Central Stores including delivery and pick up, if available; and
- Use of two canopies from the Tilden Nature Area.

A one-time contribution of \$2,000 to the Storytelling Association of California for expenditures associated with the 2010 Storytelling Festival will enable the nonprofit to bridge the difficult years (for raising funds and securing donations) and ensure that elementary school children will participate in the educational study trip.

RECOMMENDATION

Staff recommends that the Board Executive Committee approve funding this year only in the amount of \$2,000 from Board Contingency Funds to support the 2010 Storytelling Festival.



DATE: March 19, 2010

TO: Board Executive Committee

FROM: Pat O'Brien, General Manager

SUBJECT: Background Information for the March 25, 2010
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ITEM 2: Approval of Land Use Plan Amendment for Garin Regional Park

Raphael Breines, Senior Park Planner, will make a presentation on this agenda item.

BACKGROUND

The District acquired the 108-acre Gammon property in 1994 and the 100-acre Jensen and 75-acre Klawitter properties in 1992, known collectively as the North Garin land bank. The North Garin land bank is located over a mile northeast of Garin Regional Park on Walpert Ridge in the hills above Hayward in unincorporated Alameda County (see Vicinity Map). This land is generally unimproved except for overhead power lines and a ranch road, which will become part of the Bay Area Ridge Trail. Stonebrae, L.P., the developer of the adjacent Stonebrae Country Club, plans to dedicate to the District open space which borders the North Garin land bank to the south. The District's Five Canyons Open Space and Trail System adjoins to the north.

The North Garin land bank comprises 283 acres of grassy ridgetops and heavily wooded slopes, consisting of oak/bay woodlands with pockets of scrub vegetation. The terrain consists of a ridge and a creek linked by moderate to steep slopes with elevations ranging from approximately 560 feet to 1,200 feet above sea level. The North Garin land bank is now primarily used for grazing, and exhibits considerable wildlife habitat diversity as a result of the variation in physical features and connections to surrounding open space areas. A full range of terrestrial wildlife is present including coyote, deer, fox, bobcat, hawks, owls, and songbirds. Special-status birds with the potential to occur include golden eagle, peregrine falcon, prairie falcon, Northern harrier, Cooper's hawk, sharp-shinned hawk, white-tailed kite, California horned lark, burrowing owl, loggerhead shrike, and yellow warbler. The land is within designated critical habitat for both the Alameda whipsnake and California red-legged frog, which, along with California tiger salamander, have the potential to occur on site, though none of these species have been observed.

Research suggests no specific activities, events, or persons of historical significance are associated with the North Garin land bank. The land contains few improvements and it is likely that throughout more modern historical times ranching was the main activity that took place here. The northernmost parcel, of which the District acquired almost 108 acres, was originally 114 acres, but the owner retained a six-acre private inholding with a house on it which is accessed through a private easement.

The District purchased the North Garin land bank primarily to allow for the continuation of the regional trail system. A former ranch road, which will extend the Bay Area Ridge Trail by two and a half miles, traverses the length of the property. To the north, this multi-use regional trail connects to the Five Canyons Open Space and Trail System; to the south the trail ends for the time being at land that will be dedicated to the District by Stonebrae, L.P.

Previous Planning/CEQA Review

The Board of Directors adopted a Land Use Development Plan and Environmental Impact Report for Garin Regional Park on November 23, 1976 (Resolution No. 1976-11-337), before the acquisition of the subject land bank properties. Staff is now preparing a land use plan amendment for Garin Regional Park encompassing existing regional parkland and land bank properties, as well as land still under agreement to be dedicated to the District as part of the adjacent Bailey Ranch and Stonebrae developments.

The District placed the Gammon, Jensen, and Klawitter properties in land bank status at the time of their acquisition. The properties are part of a trail corridor study of the Garin/Dry Creek Pioneer to Chabot section of the Bay Area Ridge Trail for which the Board of Directors certified an Environmental Impact Report on August 15, 1978 (Resolution No. 1978-8-192).

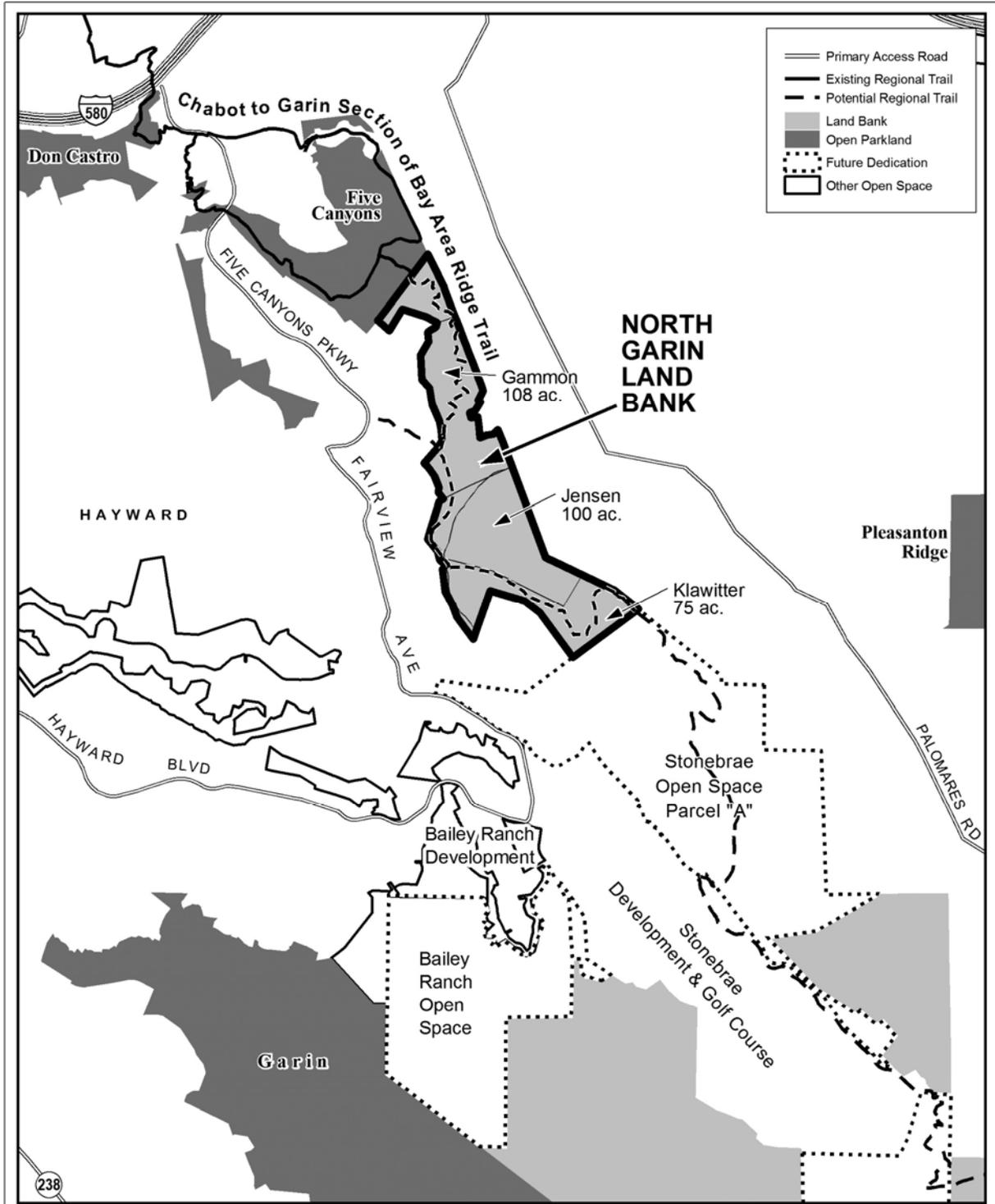
The public is now trespassing on the North Garin land bank and pressure from the public is building to open this area. In addition, Garin park staff now maintains and operates the land bank as if it were open to public access. Opening this land to full park operation will provide more of a public presence to discourage potential undesirable and unlawful activity and can be done within existing Public Safety and Park Operations budgets.

Staff prepared a LUP Amendment Checklist, included as Attachment A, for the North Garin land bank in accordance with the modified LUP Amendment Checklist process approved by the Board of Directors in 2000. This process was designed to establish park operations and public access for certain land bank or recently acquired properties in a timely manner while conforming to the planning policies of the District Master Plan. The LUP Amendment Checklist process allows for the opening and operation of land bank or newly acquired properties that meet the following conditions: (1) the District has adopted a CEQA document for the properties at the time of acquisition; (2) the land is associated with parkland that has an adopted land use plan and CEQA document; (3) development will be limited to activities covered in the CEQA document or that are categorically exempt from the provisions of CEQA; (4) land use is limited to pre-acquisition use and trail use with no new access required; and (5) the District can open and operate the land within existing budgets. The inclusion of the North Garin land bank into Garin Regional Park is consistent with these conditions.

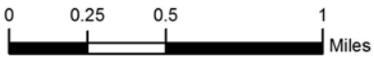
RECOMMENDATION

Staff asks that the Board Executive Committee review Attachment A and make a recommendation to the Board of Directors to approve this proposed action at a regularly scheduled meeting. If approved by the full Board of Directors, staff would take the appropriate measures to open the North Garin land bank to park operation and public access. There is no cost associated with the approval of this recommendation.

Attachment A: LUP Amendment Checklist




East Bay
 Regional Park District
 Checklist Amendment
 Planning/Stewardship/GIS Services
 JAN. 11, 2010



Vicinity Map
NORTH GARIN LAND BANK
CHECKLIST AMENDMENT

Garin Regional Park
 Hayward, Alameda County, California

Attachment A

LUP Amendment Checklist – Garin Regional Park To Remove Gammon, Jensen and Klawitter Properties from Land Bank Status and Open Properties to Park Operation and Public Access

A. CEQA

An EIR or Negative Declaration adopted by the Board at the time of acquisition.

-or-

A Categorical Exemption adopted by the Board for property where pre-acquisition land use will be continued and resources will not be adversely affected.

The Gammon, Jensen, and Klawitter properties, known collectively as the North Garin land bank, are part of a trail corridor study of the Garin/Dry Creek Pioneer to Chabot section of the Bay Area Ridge Trail for which the Board of Directors certified an Environmental Impact Report on August 15, 1978 (Resolution No. 1978-8-192).

B. LUP

The parkland that the properties are associated with must have an adopted LUP or ILUP and CEQA document.

A Land Use Development Plan and an Environmental Impact Report for Garin Regional Park were adopted by the Board of Directors on November 23, 1976 (Resolution No. 1976-11-337).

C. Development

Development on the properties will be limited to the actions covered in the CEQA document adopted at the time of acquisition or actions that are categorically exempt from the provisions of CEQA.

No development is proposed on the North Gain land bank at this time. Future development will require a plan amendment.

D. Land Use

Land uses limited to pre-acquisition use and public trail use. No new access. Parkland must be accessible from existing trails.

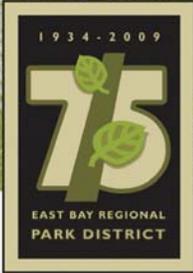
The North Garin land bank is contiguous with existing park boundaries of Five Canyons Open Space and Trail System to the north. The North Garin land bank shares its southern border

with Stonebrae open space Parcel A, planned to be dedicated to the District. An existing ranch road is proposed as part of the multi-use Bay Area Ridge Trail. No new trail access is proposed.

E. Minimal Cost

Property opening and ongoing operations and public safety costs must be minimal and able to be accommodated with existing budget. This determination is to be made by the Unit Manager, Chief of Maintenance and the appropriate Public Safety Lieutenant.

The property is being operated and maintained as parkland at present. Chief of Parks, Jack Kenny, Chief of Maintenance, Anne Scheer, and Police Captain Mark Ruppenthal have stated that the North Garin land bank can be operated within existing budgets.



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DATE: March 19, 2010

TO: Board Executive Committee

FROM: Pat O'Brien, General Manager

SUBJECT: Background Information for the March 25, 2010
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ITEM 3: Wildfire Hazard Reduction and Resource Management Plan, EIR, and Response to Comments

Brian Wiese, Chief of Planning & Stewardship, will make a presentation to the Board Executive Committee on the draft Wildfire Hazard Reduction and Resource Management Plan ("Plan") and accompanying EIR. Staff will also address issues raised by the public regarding the Plan and EIR. Planning & Stewardship staff and its consultant, LSA Associates, have completed reviewing public comments on the Draft Wildfire Hazard Reduction and Resource Management EIR, and, with this meeting, are providing the Response to Comments to the Board and public for final consideration.

BACKGROUND

The East Bay Regional Park District ("District") has been concerned with managing wildfire fuels, particularly eucalyptus, in the East Bay Hills since the Walker Tilley Plan of 1936. Fuel breaks along the urban edge of the hills parks were initiated and managed by District staff after the eucalyptus freeze of 1974, and fuels management work has been ongoing ever since. In the aftermath of the 1991 Oakland firestorm and the subsequent reports from numerous panels, including FEMA's "Hazard Mitigation Report for the East Bay Fire in the Oakland-Berkeley Hills" (1991), the Oakland-Berkeley "Task Force on Emergency Preparedness & Community Restoration: Final Report" (1992) and the "1995 Fire Hazard Mitigation Program & Fuel Management Plan for the East Bay Hills (East Bay Hills Vegetation Management Consortium), it was felt that the District needed to develop a system-wide strategy for managing the wildland fuels on the East Bay hills side of the urban edge. With the approval of Measure CC in 2004, the District committed to undertaking an environmental impact review (EIR) to ensure that this strategy would be environmentally sound and would support the District's wildland management policies and practices. It is important to recognize that the current Plan does not represent "new" work for the District, but, rather, provides a comprehensive, strategic and

environmental assessment of vegetation management work that has been ongoing in various forms since the District was founded. The consultant's charge was to:

- Analyze location and adequacy of District fuels management projects and recommend future work that needs to be accomplished to complete fire protection measures for District-owned fuel break and eucalyptus and pine management projects; and
- Evaluate the environmental effects of various vegetation/fuels management options and describe practices which will maintain optimal habitat and ecological function and minimize or mitigate the effects of vegetation management on defined habitat areas and species of concern.

The Plan evaluated the areas of highest wildfire hazard in the 19,000 acres of regional parklands in the Measure CC zone, and identifies approximately 3,000 acres as priority areas (i.e. recommended treatment areas) for vegetation management for fuel reduction purposes. In most instances, the recommended approach to fuels reduction is gradual and incremental, focusing on the removal of excessive ground and ladder fuels and selectively thinning overgrown eucalyptus plantations. The major difference between this Plan and the ongoing vegetation work now and in the past, is that this Plan takes a comprehensive, system-wide approach to vegetation management which focuses on environmental assessment, follow-up, and maintenance. The Plan provides detailed recommendations, guidelines, and best management practices for managing each of the different vegetation communities present in the Measure CC zone, and protecting and improving the plant ecology and habitat values on District parklands in the East Bay. Finally, it recommends an implementation process of ongoing project review and evaluation, and adaptive decision-making and management. The long-term management strategy is to guide plant succession toward more fire-safe, sustainable plant communities which will demand less intervention and maintenance, and thus reduce both fire potential and future costs to the District over time.

Public Review and Comments

An extensive public review process has been provided during development of the Plan. Five public information meetings were held between April 2006 and September 2, 2009. Staff also conducted several field trips to fuels project sites in the East Bay Hills for the Park Advisory Committee ("PAC") and interested stakeholder groups. Public informational reviews and updates have been held before the full Board, and before the Board Executive Committee on July 23, 2009. The Plan and EIR were released for a 60-day public review period from August 3 through October 1, 2009; and the review period was subsequently extended to October 31, 2009 for a total of 89 days. The PAC had an informational review of the Plan on April 27, 2009, a field trip in June 2009, and again reviewed the Plan on January 14, 2010, at which time it unanimously recommended adoption to the Board of Directors.

During the public comment period, a total of 37 comment letters were received from public agencies, organizations, and individuals, in addition to 18 comments recorded at the CEQA public hearing held on September 2, 2009, during the public review period. Many of the comment letters were lengthy and detailed. Although the scope of CEQA review provides an

opportunity for other agencies and members of the public to comment specifically and only on the environmental effects of the project (in this case, the Plan), many of the comments received addressed the Plan itself—its goals, analysis and recommendations—rather than its environmental impacts. Staff and consultants nevertheless made an effort to address all comments in the interest of full public information. However, the Board of Directors should bear in mind the proper scope of comments under CEQA and that, as the Lead Agency, the District has broad discretion in setting the goals and actions proposed in a project, as well as the standards of environmental review.

Some of the commenters suggested specific changes to the conditions and recommendations for treatment areas recommended in the Plan and referenced in the EIR. Recommended changes to the EIR are included in the Response to Comments document in Chapter IV. Text Revisions.

The following is a summary of the major issues raised by commenters and the District's responses:

Comment: This Plan is not about fire hazard mitigation; it is about native plant restoration. It is not consistent with the purposes of Measure CC.

(See Master Response No. 3, comments and responses B8-2 and others).

Both the District Master Plan and Measure CC specifically commit to protecting and restoring native plants (where feasible) and managing eucalyptus and other hazardous vegetation for fire reduction purposes. The Master Plan establishes the following policies:

- The District will maintain and manage vegetation to conserve, enhance, and restore natural plant communities; to preserve and protect populations of rare, threatened, endangered, and sensitive plant species and their habitats; and, where possible, to protect biodiversity and to achieve a high representation of native plants and animals.
- The District will conserve, enhance, and restore biological resources to promote naturally functioning ecosystems. Conservation efforts may involve using controlled grazing, in accordance with Wildland Management Policies and Guidelines, prescribed burning, mechanical treatments, integrated pest management, and/or habitat protection and restoration. Restoration activities may involve the removal of invasive plants and animals or the reintroduction of native or naturalized species adapted to or representative of a given site.
- The District will evaluate eucalyptus, pine and cypress plantations, and shrubland or woodland areas occurring along the wildland/urban interface on a case-by-case basis for thinning, removal, and/or conversion to a less fire-prone condition. The District will construct and maintain fuel breaks, as necessary, to manage hazardous fuels and contain wildfires. The District will minimize the widespread encroachment of monotypic stands of coyote brush, poison oak, and broom on park land.

The published ballot language for Measure CC states that funding will be used to “Manage exotic plant species and promote fire resistant natives to reduce the risk of wildfires.”

Consistent with these policies, the Plan establishes four goals:

- Reduce the wildfire hazards on District-owned lands to an acceptable level of risk.
- Maintain and enhance ecological values for plant and wildlife habitat consistent with wildfire reduction goals.
- Preserve aesthetic landscape values for park users and neighbors.
- Provide a vegetation management plan which is cost-effective and both environmentally and financially sustainable to the District on an ongoing basis.

Thus, the Plan seeks to balance the dynamic tensions between the necessity of managing hazardous fuels, protecting and enhancing native plant communities and wildlife habitat in our parks, and doing so in a manner that is efficient, effective, and financially sustainable to the District. An overall goal could be stated as follows:

To maintain stable plant communities with high habitat value and biodiversity, low fire hazard, and the lowest achievable requirement for ongoing maintenance.

The strategy of the Plan is to remove the highest fuel hazards and work to promote a gradual succession toward generally native plant communities, which will be less hazardous and more self-sustaining, and thus will require less maintenance and lower expenditures over time. The Plan will thus provide a double benefit of improved public safety and responsible environmental stewardship.

Comment: The vegetation management program should be species-neutral. The Plan targets eucalyptus as a greater fire hazard than native plants.

(See Master Response No. 3, table III-2, comments and responses B-8-23, B8-116, B8-121).

The Plan is species neutral, and in the Plan Chapter V. Vegetation Management Program, addresses all types of vegetation in the context of fuels management. The Wildfire Hazard Assessment, Chapter III of the Plan, and Appendix C, assesses the fuel characteristics of various plant associations. The assessment shows that some species of vegetation make better fuels and are greater wildfire hazards than others. This may be because of their structure, chemistry, height, biomass, capacity for re-growth, and other characteristics. Eucalyptus is a particularly dangerous fuel hazard because of its:

- Height: Mature eucalyptus typically exceeds 100 feet in height, much higher than any native shrubs or trees. In a high-intensity fire, eucalyptus may torch, and the resulting crown fire may loft embers for a distance of more than a mile.
- Structure: Eucalyptus sheds branches, dry leaves and strings of bark, and accumulates large amounts of litter on the forest floor. These “surface fuels” may act as tinder, stoking fires in the understory. Stringy eucalyptus bark is extremely flammable, and may act as a “ladder fuel,” conducting flames up the trunks to start crown fires. The light,

fibrous bark also ignites and lofts burning brands, which are carried great distances by high winds, causing spot fires in remote locations.

- **Density:** If a eucalyptus tree is cut and the stump remains untreated, multiple young saplings will re-sprout from the stump, reaching a height of 50 feet in 10-15 years and creating a thick forest which is almost impossible to penetrate to maintain, and presents a dangerous fire suppression environment for firefighters. An un-maintained eucalyptus forest may have re-sprouts with a density of 700-1,200 trees per acre (compared with 50-150 trees per acre in managed groves), and drops additional ground-fuels amounting to 30-60 tons/acre (vs. 2-10 tons/acre in a managed grove). The density and combined bio-mass of this forest create an enormous and dangerous fuel load. Thinning such a forest by removing the young re-sprouts reduces the amount of litter to manage and makes maintenance access easier and safer and makes for a healthier stand.

Comment: Eucalyptus should not be removed; ground fuels should be managed.

(See Master Response No. 3; Rejected Alternative 3, No Tree Removal, revised Chapter V. Alternatives in Chapter IV of the Response to Comments Document).

The Plan generally recommends thinning of eucalyptus, and management of ground fuels and ladder fuels, in most areas. However, because of the rapid re-growth and density of eucalyptus sprouts, young eucalyptus stands must be thinned and managed and re-sprouts prevented from occurring. (See Plan, Chapter V. Vegetation Management Program and Table III-2, Recommended Treatment Areas (“RTA”) Sensitive Resources and Preliminary Considerations and Guidelines). In other areas, where the location of eucalyptus presents an immediate fire hazard, or where removal of the overstory is recommended to allow growth of native oak, bay, and manzanita in the understory, total removal is recommended.

The Plan recommends treatment of about 3,000 acres of vegetation out of the 19,000 acres of parkland within the Measure CC fuels study area. Of this area, approximately 1,370 acres of eucalyptus are designated as hazardous in the Plan and proposed to be managed, mostly by thinning and managing ground and ladder fuels. With full implementation of the Plan, thousands of eucalyptus will still remain, both inside and outside of the treatment areas, and beyond District lands.

Comment: Herbicides should not be used as part of the treatment program.

(See comments and responses B5-5 and B5-14; B8-101-107, and B8-125; C3-15 and C3--18; Alternatives rejected from further consideration, No Chemical Use Alternative, Draft EIR, revised Chapter V. Alternatives in Chapter IV of the Response to Comments Document).

A significant difference between this Plan and District fuels management actions of the past, is that this Plan focuses a great deal of attention on post-treatment follow-up and maintenance. A major failing of past fuel break maintenance efforts, particularly with eucalyptus removal, was that there was sporadic follow-up in terms of stump treatment, or none at all. According to Jerry Kent, retired Assistant General Manager for Operations, who supervised work to remove freeze-damaged eucalyptus in Tilden, Sibley, and Chabot in 1974 and over the next 30 years:

Follow-up maintenance or stump treatments were never attempted in these areas. Today Tilden, Sibley and Chabot have large areas of multi-trunk, 35-year-old trees growing out of the old stumps. Many of these areas also have dense (400-1,000 stems per acre) areas containing suckers and seedlings that were mapped in the 2004 vegetation layer as thinned bluegum eucalyptus.

Eucalyptus stumps *must* be treated, or they will produce multi-trunked stump sprouts which will grow to a height of 50' within 10-15 years. After experimenting with other chemical applications over time, the District has found that the safest and most effective stump treatment is the local, hand-application of Triclopyr (Garlon). Triclopyr is certified by the USEPA and State of California for stump sprout control and approved by the District through its IPM program. It is applied by trained and licensed chemical applicators, directly to cut stumps, where it is immediately absorbed in the plant's vascular system. Members of the public are warned of chemical application via postings at the park site. Neither Triclopyr (Garlon) nor Glyphosate (Roundup) is considered a Category I (Danger) or Category II (Warning) herbicide by the EPA; and the potential effects of their application have been thoroughly evaluated by registered toxicologists for the State, and for the District's IPM program. With the best management practices indicated in the Plan and EIR and practiced by the District, they are found to have no significant effect on people or the environment. While other, non-chemical methods of treating stump sprouts and weed species may be used (e.g. hand removal, plastic tarping, flaming), they are not effective as long-term maintenance solutions for large wildland areas. This is borne out by the District's experience and by the Marin Municipal Water District's current efforts to control invasives (primarily broom) without the use of chemicals.

Comment: Need for Subsequent Review. The Plan does not provide sufficient detail to adequately analyze the environmental impacts of individual fuels treatment projects, and subsequent CEQA review should be required.

(See Master Response No. 1, and responses and comments B3-18).

The Plan was prepared based on on-site assessments of the specific fuels and environmental conditions in the Study Area. Each of the 133 recommended treatment areas was checked in the field by staff and consultants; and fuels treatment recommendations were based on conditions observed, including vegetation types, hazardous fuel accumulation, proximity to structures, slope, landslide hazard, water resources, sensitive species occurrences, and other resource values. The Plan provides detailed descriptions of 16 vegetation communities found in the East Bay (Chapter V. Vegetation Management Program), with recommended management options appropriate to each community and to different environmental conditions and post-treatment conditions over time. These management strategies are then applied as recommendations to address the specific conditions found in each of the treatment areas (Chapter III. Wildfire Hazard Assessment and Preliminary Recommendations). Environmental stewardship is a goal and major focus of the Plan. The Plan and EIR do provide adequate detail on conditions found in each of the recommended treatment areas and adequate review and analysis according to the CEQA guidelines. The District wants to maximize the benefit of the tax dollars given by the public through Measure CC by timely delivery of fuels management and environmental maintenance projects, not on unnecessary subsequent CEQA review.

In developing treatment activities for each recommended treatment area, Stewardship, Fire Department and Operations staff jointly reviewed the treatment recommendations, including environmental considerations and guidelines, in the Plan and mitigation measures in the EIR, and will conduct a detailed field assessment of each project site in order to verify conditions at the time of treatment. Based on this site assessment, staff will prepare a treatment prescription detailing both fuels management work and environmental remediation. The prescription will be signed off by both the Assistant Fire Chief and the Stewardship Manager, representing that they have been field-checked and are consistent with the Plan and EIR as approved by the Board of Directors. If it is found that conditions encountered or prescribed treatment methods are significantly different from those covered in the EIR, and that there would be new significant environmental effects or a substantial increase in the severity of previously identified significant effects per CEQA Guidelines section 15162, then the District will evaluate whether subsequent CEQA review must be performed and will comply with State law.

Finally, the Plan proposes an implementation strategy based on public review of an Annual Fuels Treatment Action Plan as a regular part of the District's planning and budgeting process. This would include a review of past years' treatment programs, the status of vegetation management needs and priorities in the Study Area parks, and a work program to address priority treatment and maintenance needs in the coming year. The review of the entire program is intended to be re-iterative and adaptive, in order to continuously update the Plan and treatment processes, and to provide opportunities for constant improvement in methodology and effectiveness.

RECOMMENDATION

Staff requests that the Board Executive Committee approve this item and recommend approval of the Plan and EIR to the full Board of Directors.

(Note: The Plan and Response to Comments are available for review at www.ebparks.org)