



THE DEFORESTATION OF EAST BAY HILLS

This plan will result in “unavoidable adverse impacts... to vegetation, wildlife and habitats, protected species, soils, water quality, aesthetics, community character, human health and safety, recreation, and noise.” – FEMA Environmental Impact Statement (EIS)

“An inordinate amount of the Plan is an attempt at land transformation disguised as a wildfire hazard mitigation plan. If it is implemented it will endanger firefighters and the general public; and it will be an outrageous waste of taxpayers’ money.”

– David Maloney, former Oakland firefighter and Chief of Fire Prevention at the Oakland Army Base who served on the Task Force on Emergency Preparedness and Community Restoration created after the 1991 fire, commenting on the East Bay Regional Park District’s (EBRPD) “Wildfire Hazard Mitigation Plan and EIR” upon which the FEMA plan is based

Trees will not be “thinned.” Entire groves will be destroyed.

FEMA, the federal agency funding most of this plan (the rest will be paid by local taxpayers), prescribes the exact terms of its implementation in its Environmental Impact Statement (EIS). According to FEMA, Oakland will remove 100% of Eucalyptus, Monterey Pine, Monterey Cypress, and Acacia trees across its project areas (1/3 of the trees every year for three years). U.C. Berkeley will also remove all such trees (about 12,000 trees at Strawberry Canyon, 10,000 trees at Claremont Canyon and 25,000 trees at Frowning Ridge). The East Bay Regional Parks District will remove "entire groves" on ridgelines. Below ridgelines, EBRPD will remove enough trees so they are spaced to a distance of 25 feet in some areas and to a distance of 35 feet in others. The average tree density after implementation would be approximately 60 trees per acre from average densities of between 400 to 900 trees per acre, a decrease of more than 90%.

FEMA also prescribes what is to be done in each Regional Park. For instance, the FEMA EIS states that at Sibley Volcanic Preserve, “EBRPD would convert about two-thirds of the eucalyptus forest and smaller amounts of... pine forest... to... grassland.”(Sec. 3.4.2.4.5.) Such an extreme reduction in tree density cannot be accurately described as “selectively removing or thinning.”

Overall, about 400,000 trees would be removed by all three project partners. In addition, despite suggestions that “native” trees will grow where forests are cut down, no funds are allocated for replanting nor do any such plans exist as the explicitly stated goal is “conversion of dense scrub, eucalyptus forest, and... pine forest to grassland with islands of shrubs.”

Carcinogenic herbicides will be used in residential areas and wildlife and recreation corridors.

Herbicides will be spread upon stumps of Eucalyptus

trees two times per year for up to 10 years. Herbicides will also be spread upon the resulting brush that will grow in the absence of trees. Three herbicides have been approved by FEMA: *Imazapyr*, which increases the risk of adrenal, brain and thyroid cancer, Dow Chemical’s *Triclopyr*, linked to breast cancer and genetic damage called dominant lethal mutations, and Monsanto’s *Glyphosate*, which increases the risk of Non-Hodgkin’s lymphoma and has been classified as a “probable human carcinogen” by the World Health Organization. San Francisco officials announced that the city is officially reclassifying *Glyphosate* as a Tier 1, or “most toxic” chemical, and Marin County officials announced they will no longer use it on popular hiking trails due to public health concerns.

Despite evidence supporting the danger of herbicides, the EBRPD submitted documentation showing they will apply a total of 2,250 gallons (<http://goo.gl/EfFv8B>) of these chemicals in our public parks. That amount does not include herbicide use by the other two partnering agencies which - based on extrapolations and past use - could add up to thousands more.

The plan increases the risk of fire and puts public safety at risk.

The plan will not eliminate fire “fuel load” but instead render it highly flammable. Healthy, moisture-rich, fire-resistant trees are to be chopped down and chipped, their remains spread about sun-scorched hillsides at a depth of up to two feet, creating carpets of dried out tinder throughout the hills. According to David Maloney, former Oakland firefighter and Chief of Fire Prevention at the Oakland Army base, "Fire Science has proven that every living tree - regardless of its species - due to its moisture content and canopy coverage of ground fuels contributes to wildfire hazard mitigation." (<http://goo.gl/hm9Jp8>.) For example, fog drip falling from Monterey Pines in the East Bay has been measured

at over 10 inches per year. In San Francisco, fog drip in the Eucalyptus forest was measured at over 16 inches per year.

The Scripps Ranch fire of 2003, for example, (see photo below) burned 150 homes, but not Eucalyptus trees abutting many of those homes. When Angel Island erupted in flames in 2008, it was the areas where the Eucalyptus were cut down that burned; burned to the very edge of the Eucalyptus forest, then stopped for lack of fuel: "At the edge of the burn belt lie strips of intact tree groves... a torched swath intercut with untouched forest," reported the San Francisco Chronicle. A 1991 Oakland Firestorm survivor writes: "I was a student at Cal during the 1991 fires. I lived in the Berkeley hills above campus near Strawberry Canyon. The Eucalyptus and other trees saved the houses on my street by serving as a barrier between us and the fire."

In fact, the U.S. Geological Survey notes that only 3% of fires occur in forests. The remainder - 97% - burn mostly in shrublands and grasslands (and urban areas), the exact type of vegetation in which the 1991 Firestorm ignited and which the native plant ideologues behind this plan want to recreate in the hills. Says Chief Maloney, "If it is implemented it will endanger firefighters and the general public; and it will be an outrageous waste of the taxpayer's money." The stated aim of the deforestation effort is to replace the East Bay's Eucalyptus and Monterey Pine forests with shallow grasses, grasses that are highly susceptible to fire and which even the EBRPD has admitted on their website are "one of the most dangerous vegetation types for firefighter safety due to the rapid frontal spread of fire that can catch suppression personnel off guard."

A study published by the USDA Forest Service, "Reducing the Wildland Fire Threat to Homes," (<http://goo.gl/n72lhI>) concludes that "home losses can be effectively reduced by focusing mitigation efforts on

the structure [such as requiring a fireproof roof] and its immediate surroundings." The study notes that "ignitions from flames occur over relatively short distances - tens of meters not hundreds of meters" and concludes that cutting down trees not adjacent to homes does nothing to protect those homes: "Extensive wildland vegetation management does not effectively change home ignitability," and yet that is precisely what this plan does. For instance, the southern area of Anthony Chabot Regional Park is nowhere near structures and yet subject to massively removal of trees: "There are no adjacent communities because the proposed and connected project areas are entirely surrounded by parkland." (FEMA EIS).

Animals will be harmed.

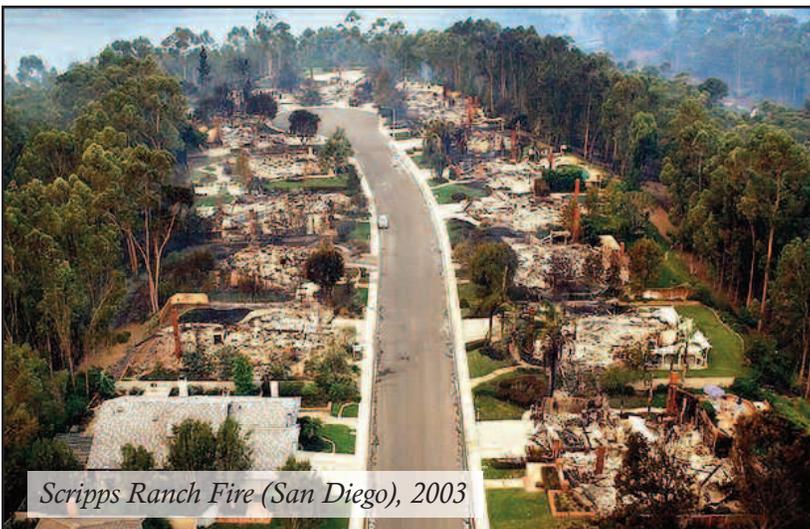
Forests spanning 2,059 acres of public lands which provide habitat for multitudes of animals will be destroyed. Stands of trees which give our wild neighbors safety, shelter, shade, a place to nest and which create the ecosystem that produces their food supply will be decimated. Noise from chainsaws, fellers and bunchers, haul trucks, chippers, stump grinders, and air compressors will be significant. Thousands of gallons of herbicides known to be toxic to wildlife will be spread, contaminating their food and water supply.

While the plan calls for biologists to inspect trees slated for clear cutting for raptor nests, no such plan exists for other species of birds, nor other animals such as squirrels who likewise nest in trees.

Eliminating and poisoning habitat and creating a loud, destructive and disruptive presence in what are now peaceful, healthy forests populated by hundreds of thousands if not millions of animals will inevitably result in great animal suffering: fear, stress, anxiety, accidental injury, poisoning and ultimately, starvation and homelessness. Indeed, FEMA calls harm to these and other animals "unavoidable."

Eucalyptus trees increase biodiversity.

Eucalyptus trees are an important nesting site for hawks, owls and other birds and are one of the few sources of nectar for Northern California bees in the winter. Over 100 species of birds use Eucalyptus trees as habitat, Monarch butterflies depend on Eucalyptus during the winter, and Eucalyptus trees increase biodiversity. A 1990 survey in Tilden Park found 38 different species beneath the main canopy of Eucalyptus forests, compared to only 18 in Oak woodlands. They also prevent soil erosion in the hills, trap particulate pollution all year around, and sequester carbon.



Scripps Ranch Fire (San Diego), 2003