HILLS EMERGENCY FORUM

RECEIVED BY
DEC 27 2012
BOARD OF FORESTRY AND FIRE PROTECTION

December 15, 2012

Chairman Stan Dixon
Board of Forestry and Fire Protection
PO Box 944246
Sacramento, CA 94244-2460

Dear Chairman Dixon and Members of the Board:

At the October 19, 2012 Annual Meeting the Hills Emergency Forum (HEF) members unanimously approved a request to the Board of Forestry regarding conflicts between removal of trees for fire hazard reduction and the Z'Berg-Nejedly Forest Practice Act. The HEF is comprised of nine public entities in the San Francisco East Bay and focuses on wildfire safety. Many of these agencies have land management policies and long range plans that encourage removal of the non-native eucalyptus and pine trees for fuel reduction.

We request that the Board of Forestry review three issues related to the Forest Practice Act:

1. Include a silvicultural goal for stand conversion whereby restoration to native forests is an acceptable outcome.
2. Acknowledge the threat posed by fire-brand cast from eucalyptus stands, which requires management for a wider distance from structures, of as much as 1.5 miles. Currently there is an exemption for fire hazard management of trees within 150 feet of structures.
3. Provide greater latitude in stocking standards to enable public landowners to effectively manage forests according to fire-prevention standards and associated grant-specified levels as set forth in local fire management plans and grant applications.

Enclosed is additional background information on these issues. We would be pleased to work with your staff to provide further information. You can contact me at (510) 215-4300 or HEF staff, Cheryl Miller, at (510) 536-0143, email: hillsemergencyforum@comcast.net.

Sincerely,

Scott Hanin
El Cerrito City Manager
Chair 2012-2013 Hills Emergency Forum

Attachments

Full 9.0

Background Information

Several public landowners in the East Bay Hills have General Plans, Long range development plans, along with associated management and land use plans and Environmental Impact Reports (EIRs) that encourage removal of pyrophoric trees, primarily eucalyptus, in a manner consistent with public landowners' General Plans, Long Range Development Plans and associated management plans and EIRs.

In order to remove a barrier to implementing these plans, changes to the CALIFORNIA FOREST PRACTICE RULES 2012 Title 14, California Code of Regulations Chapters 4, 4.5 and 10 should be considered for immediate adoption and implementation. The Hills Emergency Forum requests that consideration of these changes addressing eucalyptus be categorized as a *Tier I priority*. *Eucalyptus species* has been singled out for removal in myriad reports following the 1991 Oakland Tunnel fire. The Forest Practice Rules should be changed in order to allow public landowners a range of management approaches to manage the fire threat these trees pose. The current exemptions that apply for management of trees within 150 feet of structures are too narrow for eucalyptus trees with such a propensity and ability to produce and distribute brands over several miles.

In addition to eucalyptus, the East Bay hills were heavily planted with Monterey pine trees beginning in the early twentieth century. The purpose of these plantings was not to create timberlands for the purpose of commercial harvest, but rather to rapidly convert the native grass and shrublands into a forest for the express purpose of selling residential home lots to buyers accustomed to homes on wooded lands. The Monterey pines are pyrophytic, short lived, prone to mortality from pitch canker and beetles, and propagate aggressively.

The combination of Monterey pines and eucalyptus plantations in the *wildland-urban interface* virtually assures that these areas will be periodically revisited by catastrophic wildfires, while offering virtually no commercially viable timber values. Large public landowners should be encouraged to manage these stands of exotic, invasive pyrophoric trees, rather than be regulated in the same manner as land owners primarily concerned with commercially harvesting timber for profit.

The Hills Emergency Forum requests rule changes address the following:

1. Include a silvicultural goal for stand conversion whereby restoration to native forests is an acceptable outcome. Restoration would necessarily involve complete removal of the eucalyptus because eucalyptus often comprises an overstory of emerging oak/bay woodlands that cannot thrive under the invasive alien's presence. These woodlands offer valuable habitat, visual interest, and are highly regarded/treasured by the public. In fact, current forest practice rules have been considered to promote this type of vegetation. In other locations outside the East Bay, eucalyptus also supplants other, more valuable and native species, such as Douglas fir.

2. Acknowledge the threat posed by fire-brand cast from eucalyptus stands, which requires management for a wider distance from structures, of as much as 1.5 miles. Fire brands

are now considered the main cause for rapidly developing fires, which lead to extreme structure losses.

3. Provide greater latitude in stocking standards to enable public landowners to effectively manage forests according to fire-prevention standards and associated grant-specified levels as set forth in local fire management plans and grant applications.

The Hills Emergency Forum agencies collectively recognize the need for measures to mitigate the negative environmental impacts that can arise during vegetation management operations for wildfire hazard reduction and does not seek to avoid sound harvesting practices, erosion control, endangered species protection, watercourse protection and other similar environmentally based controls as may be articulated in NEPA and CEQA reviews. However, the stocking requirements and general timber site classifications bestowed upon these lands that have not, and will not be used for commercial forest production are onerous and unnecessary, and have the effect of making such work untenable and unaffordable.

The Hills Emergency Forum encourages the Board of Forestry to enact rule changes as necessary to enable legitimately planned fire mitigation projects be carried out without the undue burden of complying with the existing Forest Practice Rules, which presume the actions are driven by the benefit of products reaching the marketplace and not for the purposes of promoting public safety and the protection of property.

Cc: HEF Members (see attached List)
Mayor and Council Members City of El Cerrito
Mayor and Council Members City of Berkeley
Mayor and Council Members City of Oakland
Senator Diane Feinstein
Congresswoman Barbara Lee
Assembly Member Nancy Skinner
State Senator Lonnie Hancock

Executive Members
Hills Emergency Forum

2013 Chair
Scott Hanin
City Manager
City of El Cerrito
10890 San Pablo Avenue
El Cerrito, Ca 94530
Phone: (510) 215-4300
Fax: (510) 215-4319

Christine Daniel
City Manager
City of Berkeley
2180 Milvia Street
Berkeley, CA 94704
Phone: (510) 981-7000
Fax: (510) 981-7099

Fire Chief Teresa Deloach Reed
City of Oakland
1 Frank Ogawa Plaza, 3rd Floor
Oakland, CA 94612
Phone: (510) 238-3302
Fax: (510) 238-2223

Director Ken Pimlot
California Department of Forestry and Fire Protection,
1416 9th Street PO BOX 944246
Sacramento CA 94244-2460
Phone: ((916) 653-7772

Alex Coate
General Manager
East Bay Municipal Utility District
375 - 11th Street
Oakland, CA 94607
Phone: (510) 287-0102
Fax: (510) 287-0188

Bob Doyle
General Manager
East Bay Regional Park District
2950 Peralta Oaks Court
Oakland, CA 94605-0381
Phone: (510) 635-0135
Fax: (510) 569-1417

Al Benetiz
Lawrence Berkeley National Laboratory
1 Cyclotron Road
Berkeley, CA 94720
Phone: (510) 486-4724
Fax: (510) 486-7488

Fire Chief Randy Bradley
Moraga Orinda Fire District
33 Orinda Way
Orinda, CA 94563
Phone: (925)258-4599

Ed Denton
Vice Chancellor Facilities
University of California, Berkeley
100 A&E Building
Berkeley, CA 94720-1382
Phone: (510) 642-3100
Fax: (510) 642-9483

11/28/2012