

Project Name **Claremont Canyon Evacuation Support Project**

Project Planner **Raphael Breines**

Project Sponsor **Sally McGarrahan, Associate Vice Chancellor, Facilities**

Date **September 10, 2020**

Subject **Project CEQA Consistency Determination with 2020 LRDP EIR**

PROJECT LOCATION and DESCRIPTION

The 800-acre UC Berkeley Hill Campus is located east of the Campus Park in the East Bay Hills. Roughly 200 acres of the Hill Campus is within Claremont Canyon, which is located south of the ridge dividing the Claremont and Strawberry Creek watersheds. Upper portions of Claremont Canyon are located entirely within the City of Oakland and consist of steep terrain, much of which is heavily forested. The canyon contains a mixture of tree, scrubland and grassland vegetation with extensive areas of exotic and invasive blue gum eucalyptus (*Eucalyptus globulus*), which range between young stands (i.e., less than 40 years old) to mature stands (i.e., over 40 years old). Additional trees include native coast live oak, California bay and redwood. Understory vegetation and shrublands include native species such as California blackberry, poison oak, toyon, and coyote brush. Non-native understory plant species include cotoneaster and French broom.

The Claremont Canyon Evacuation Support Project (Project) is located along the upper portions of Claremont Avenue, within the City of Oakland and traverses Claremont Canyon, paralleling Claremont Creek, from the bottom in the west to the ridgetop in the east. The Project will treat roughly 18 linear acres on either side of upper Claremont Avenue that includes 11 forested acres (project site). This Project is part of ongoing fire management plan implementation activities in the Hill Campus carried out by Facilities Services to ensure adequate emergency access and improve life safety for the public and campus affiliates. UC Berkeley performs evacuation support projects, which are roadside treatments along emergency evacuation routes, throughout the Hill Campus.

The Project involves vegetation removal, focusing on trees regardless of species, conducted along a strip of land up to 100 feet from the edge of pavement on both sides of upper Claremont Avenue. Vegetation treatment focuses on removing trees that could potentially block access if they fall across the road or that could generate extreme radiant heat that would endanger evacuation. The project will also create a potential strategic fire line in the event of a larger incident in the canyon. UC Berkeley would remove any tree located along and within 100 feet adjacent to either side of portions of Claremont Avenue that is either unhealthy and determined by an arborist to be dead or in poor or fair condition, regardless of

species type or maturity, or that is taller than 100 feet or located so that in a fire it could fall across the road blocking vehicle access on Claremont Avenue becoming a safety hazard.

The secondary focus of the Project is to remove understory shrubs and small trees that could enable torching and burn with great intensity within 100 feet on either side of Claremont Avenue. UC Berkeley would pull or cut vegetation, primarily, young eucalyptus, sapling Monterey pine and French broom seedlings, and then apply herbicides manually to the cut exotic plants that sprout according to recommendations of a Pesticide Control Advisor (PCA). Hazard tree removal would also involve removing dead trees or tree branches that pose a public safety risk.

Whenever possible, to minimize ground disturbance, heavy machinery, such as a grapple saw or crane, would be positioned on Claremont Avenue, or landings and fire trails when removing vegetation. Heavy equipment, such as skidders and tractors, will operate from existing stable roads, fire trails and landings. No new roads would be constructed. Downed trees would be skidded by rubber-tired or tracked vehicles along skid trails to landings. Where possible, a crane located on the road would be used to reposition tree trunks after cutting further reducing potential ground disturbance. Hand crews using chainsaws, brush cutters and pruning saws will operate on the ground. Cut materials would be managed in three ways to optimize reduction of hazardous fuel loads: 1) Downed trees (biomass) would be stored or chipped onsite; 2) Large logs (cleaned of branches) would be moved to locations on the Hill Campus to be anchored and utilized for erosion mitigation, wildlife habitat or as a physical barrier to access by the public; or 3) Cut materials would be hauled to UC Berkeley's Richmond Field Station or other locations on campus, where they would be incinerated using an air curtain burner, which traps and reburns smoke particles, significantly reducing particulate matter emissions.

UC Berkeley proposes to commence the Project from November 1, 2020, through December 15, 2020, and it could take up to six weeks to complete. During active treatments, temporary closures of portions of Claremont Avenue shall occur to allow safe and efficient operations. During Project implementation, Claremont Avenue would typically be open before 9:00 am and after 4:00 pm on weekdays and no work would occur on weekends. UC Berkeley will coordinate with the City of Oakland to plan emergency access or alternative access to the areas served by the roads and trails during temporary closures of Claremont Avenue. Claremont Avenue would be cleared of debris for passage outside of work windows. All fire trails leading into the project site will remain closed for public safety for the duration of the project.

PROJECT OBJECTIVES

Objectives of the Project include:

- Support safe emergency evacuation on upper portions of Claremont Avenue in the event of a landslide, wildfire, earthquake, or other need for evacuation.
- Substantially reduce risk to life, property, and natural resources by managing the amount and continuity of vegetation in the Hill Campus that increases wildland fire hazards.

CEQA COVERAGE

The Project is part of the fuel management practices that were included in the 2020 Long Range Development Plan (2020 LRDP) and evaluated in the 2020 LRDP Environmental Impact Report (2020

LRDP EIR, approved in 2005). As explained below, the Claremont Canyon Evacuation Support Project is consistent with, and was reviewed under, these documents.

The following policy statement is excerpted from page 57 of the 2020 LRDP, adopted by the Regents of the University of California in January 2005:

POLICY: MANAGE THE HILL CAMPUS LANDSCAPE TO REDUCE FIRE AND FLOOD RISK AND RESTORE NATIVE VEGETATION AND HYDROLOGY PATTERNS.

UC Berkeley maintains an ongoing program of fire fuel management in the Hill Campus to reduce fire risk to the campus, LBNL, neighboring residents, and recreational visitors to adjacent park and watershed lands. While the treatment used in a given area must be customized to address its specific conditions, including vegetation type, access, and proximity to roads and structures, in general the treatments are designed to meet one or more of the following goals:

- reducing fuel load by removing dead material, reducing plant density, and favoring species with lower fuel content,
- reducing horizontal spread by reducing fine fuel material and by separating dense clusters of vegetation with areas of lower fuel load, and
- reducing vertical fire spread by increasing separation of understory and crown fuels.

Whenever feasible, future fuel management practices should include the selective replacement of high-hazard introduced species with native species: for example, the restoration of native grassland and oak-bay woodland through the eradication of invasive exotics (broom, acacia, pampas grass) and the replacement of aged Monterey pines and second-growth eucalyptus. Such conversions must be planned with care, however, to avoid significant disruptive impacts to faunal habitats.

In adopting the 2020 LRDP, the UC Regents made findings that applicable Continuing Best Practices and Mitigation Measures outlined in the 2020 LRDP EIR would be considered conditions of approval for the 2020 LRDP, and this Project will comply with all Continuing Best Practices and Mitigation Measures including the Continuing Best Practices and Mitigation Measures described in the 2020 LRDP EIR, excerpted below:

Mitigation Measure BIO-1-c (page 4.3-26): During planning and feasibility studies prior to development of specific projects or adoption of management plans in the Hill Campus, a habitat assessment would be conducted by a qualified biologist to assess any potential impacts on special-status species. Detailed surveys would be conducted during the appropriate season where necessary to confirm presence or absence of any special-status species. Where required to avoid a substantial adverse effect on such species, in consultation with the CDFG and the USFWS feasible changes to schedule, siting and design of projects or management plans would be developed and implemented.

Continuing Best Practice BIO-1-c (page 4.3-26): Because trees and other vegetation require routine maintenance, as trees age and become senescent, UC Berkeley would continue to undertake trimming, thinning, or removal, particularly if trees become a safety hazard. Vegetation in the Hill Campus requires continuing management for fire safety, habitat enhancement, and other objectives. This may include removal of mature trees such as native live oaks and non-native plantings of eucalyptus and pine.

Continuing Best Practice PUB-2.1-b (page 4.11-12): UC Berkeley would continue on-going implementation of the Hill Area Fire Fuel Management Program.

Continuing Best Practice PUB-2.1-c (page 4.11-12): UC Berkeley would continue to plan and implement programs to reduce risk of wildland fires, including plan review and construction inspection programs that ensure that campus projects incorporate fire prevention measures.

The 2020 Hill Area Fire Fuel Management Program (HAFFMP), prepared in 2003 for the UC Berkeley Fire Mitigation Committee and analyzed in the 2020 LRDP EIR (approved in 2005), prescribes fuel hazard activities in the Hill Campus including evacuation/emergency access routes. Page 21 of the HAFFMP recommends conducting fuel activities “from as little as 10 feet along roadsides to as much as the entire stand of a second growth eucalyptus forest where crown fires are a concern.” Page 23 of the HAFFMP includes fuel management standards for evacuation routes from 30 feet wide to 100 feet wide, depending on slope and other conditions.

UC Berkeley’s Specimen Tree Program states that “to be considered a specimen, the tree or plant should be in good health and not pose a hazard to pedestrian and automotive traffic, existing buildings or utilities...” Therefore, UCB can remove a tree or trees regardless of whether they have been designated a specimen tree if they pose a hazard associated with vehicle traffic or emergency access. All of the trees proposed to be removed pose a hazard to vehicle traffic and emergency access and egress in the Hill Campus.

As part of the project, UC Berkeley will implement applicable Continuing Best Practices and Mitigation Measures outlined in the 2020 LRDP EIR related to managing traffic, herbicides, erosion, stormwater, and cultural and biological resources. The Project will also implement the HAFFMP and is consistent with implementing 2020 LRDP EIR Continuing Best Practice BIO-1-c’s condition that UC Berkeley conduct ongoing vegetation management in the Hill Campus for fire safety by removing trees, particularly if they become a safety hazard, including removal of mature trees, such as native live oaks and non-native plantings of eucalyptus and pine, and the HAFFMP’s specification of removing up to a 100-foot wide buffer, depending on slope and other conditions.

Alameda whipsnake is a threatened species known to occur adjacent to the project site. Roughly 600 acres of the Hill Campus have been designated as critical habitat for Alameda whipsnake. Critical habitat is defined in the Endangered Species Act as specific geographic areas that contain features essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery.

Consistent with 2020 LRDP EIR Mitigation Measures BIO-1-c, a qualified biologist determined that the Project will not harm and will in fact improve Alameda whipsnake habitat conditions, but because Alameda whipsnake could move into the area from adjacent areas, UC Berkeley will implement the following siting, design and management measures as part of the Project prior to and during treatment activities to avoid impacts to Alameda whipsnake:

1. A qualified biologist will provide Environmental Awareness Training to all staff involved with vegetation treatment activities before initiation of treatment. Training materials will be provided to any new staff over the course of the Project. The training will describe the appropriate work practices necessary to effectively implement relevant measures and to comply

with the state and federal endangered species acts, and will include the identification and relevant life history information of Alameda whipsnake.

2. A qualified biologist will conduct a pre-construction survey for Alameda whipsnake within 24 hours of the onset of initial treatment activities. In addition, a qualified biologist will conduct a daily pre-activity Alameda whipsnake survey/sweep for treatments that require more than one day to implement. If an individual Alameda whipsnake is observed in the project site, work will halt immediately, if safe to do so. The qualified biologist will identify actions sufficient to avoid impacts on the species and to allow it to leave the area on its own volition.
3. A qualified biologist will monitor all treatment activities except the hand application of herbicides. The biologist will monitor the implementation of treatment activities to look for whipsnake and to ensure relevant measures are followed. The biologist will monitor truck and equipment access (i.e., the biologist will walk in front of truck/equipment on access roads ordinarily closed to vehicle traffic to look for whipsnake).
4. UC Berkeley (or contractors) will clearly delineate the project site and restrict access to work crews outside of that area to prevent impacts to adjacent sensitive biological resources.
5. UC Berkeley (or contractors) will use existing roads, trails, and former logging paths to the extent feasible and minimize ground disturbance of mechanical means (wheels, tracks, skidding to landings) to the extent feasible. UC Berkeley (or contractors) will develop an access/implementation plan that maps and names all fire roads and/or trails that will be used to reach the treatment areas and details the starting location(s) and direction of progression of treatment from each starting location in coordination with a qualified biologist.
6. UC Berkeley (or contractors) will immediately (i.e., the same day) process (remove completely from the treatment area, chip, gasify, or permanently place within the treatment site for soil stabilization) all cut materials (i.e., brush, stems, slash, and logs) as they are produced to avoid attracting Alameda whipsnake to the vegetation piles.

If processing within the same day is not feasible, UC Berkeley (or contractors) will determine suitable location(s) outside of suitable scrub and adjacent woodland/grassland habitat (e.g., within landings or temporary refuge areas), in coordination with a qualified biologist, for temporary storage of cut materials that cannot be processed immediately. Log trailers could be used as biomass repositories and removed when full. If vegetation must be removed to create a temporary storage location, UC Berkeley (or contractors) will remove understory vegetation first to facilitate visibility of Alameda whipsnake by a qualified biologist, followed by trees. Then, UC Berkeley (or contractors) will install temporary fencing to exclude Alameda whipsnake. If temporary exclusion fencing is installed, UC Berkeley (or contractors) will prepare an exclusion fencing plan that identifies the size and location of temporary staging areas, the fencing materials to be used, installation instructions, and monitoring requirements.

7. In habitat suitable for Alameda whipsnake winter retreats (e.g., within native scrub habitat not degraded by substantial nonnative tree overstory; rock outcrops within approximately 50 feet of scrub habitat), as determined by a qualified biologist, UC Berkeley (or contractors) will avoid ground disturbance and use of heavy equipment during the winter (generally November

through February or March, as determined by a qualified biologist based on temperature and weather conditions).

8. UC Berkeley (or contractors) will avoid uprooting any native species within native scrub habitat, as determined by a qualified biologist. In other habitat, UC Berkeley (or contractors) will retain native species, unless removal is required to meet program objectives.
9. UC Berkeley (or contractors) will limit vegetation removal to trees/clumps of trees and nonnative shrubs (e.g., French broom) that can be removed from Claremont Avenue without ground disturbance outside the paved road or bare (i.e., devoid of vegetation and burrows) road shoulder.
10. UC Berkeley (or contractors) will avoid ground disturbance during vegetation removal (i.e., the stump and roots will remain at a height such that ground disturbance is avoided). UC Berkeley (or contractors) will also avoid disturbance of shrub understory and duff, bark, or branches built up at the base of a tree.

If disturbance of shrub understory and duff, bark, or branches at the base of the tree is not feasible (i.e., the stump height remains too high to meet fuel-reduction objectives), UC Berkeley (or contractors) may clear duff, bark, or branches built up at the base of the tree by hand only to the extent needed, while allowing for visibility of Alameda whipsnake by the biological monitor, before cutting the tree closer to the base. UC Berkeley (or contractors) will not disturb roots or soil during hand work.

11. UC Berkeley (or contractors) will only perform vegetation treatment in this area during the fall/winter (generally September – February or March, as determined by a qualified biologist based on temperature and weather conditions).