

SAVE STRAWBERRY CANYON

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Save Strawberry Canyon is a citizens' group that seeks to preserve and protect the watershed lands and cultural landscape of Strawberry Canyon. Save Strawberry Canyon was formed out of the urgent need to take action in response to the threat of intrusive, inappropriate development on the Canyon lands.

Strawberry Canyon, opposite the Golden Gate, is a unique link to the East Bay Regional Park District lands and, by its streams and views, to San Francisco Bay. The Canyon itself with its streamside vegetation, oak-bay woodlands, grasslands, and surrounding slopes, is a rich repository of wildlife directly adjacent to the dense urban populations of the UC Berkeley Campus and the cities of Berkeley and Oakland.

Save Strawberry Canyon seeks to inform the public about the impacts of proposed developments, to encourage location of such developments to more suitable sites, and to promote better public access to the beautiful Canyon with its wildlife and scenic resources. Mission Statement

September 30, 2010

Alessandro Amaglio, Environmental Officer
U.S. Department of Homeland Security
Federal Emergency Management Agency (FEMA), Region 9
111 Broadway, Suite 1200
Oakland, California 94607-4052 EBH-EIS-FEMA-RIX@dhs.gov

Re: Comments for Draft Environmental Impact Statement (DEIS) for Hazardous Fire Risk Reduction East Bay Hills, California, and Recommendation of Alternative to Reject PDM-PJ-09-CA-2005-011 and Reject Partially PMD-PJ-09-CA-2006-004

Dear Mr. Alessandro Amaglio:

This letter comes first to express appreciation for FEMA's effort to involve the public and seek input in accordance with the purpose of the National Environmental Policy Act (NEPA). The two Public Scoping Meeting sessions held on August 26, 2010, including the materials shared, were informative and stimulating toward a public understanding of the four proposed individual projects and their potential environmental impacts.

Save Strawberry Canyon recommends not funding the University of California (UC) project PDM-PJ-09-CA-2005-011 and not funding the UC project component of PMD-PJ-09-CA-2006-004. These proposals together comprise a contiguous landscape that crests both Strawberry and Blackberry Canyons, contributing to the defining ridge of the East Bay Hills. Indeed, the 1930 Olmsted Brothers' "Report on Proposed Park Reservations for East Bay Cities (California)," prepared to advocate the establishment of the East Bay Regional Park District, recognized this ridge as integral to the creation of a great public, scenic, and natural resource.

It is relevant to recognize that at the time of the Olmsted Brothers' "Report" the once seasonal "native" condition of the hillsides and its ridges, being once either a beautiful green in the rainy season or "golden brown" in the dry months, had, in fact, already been changed by the planting of non-native trees such as the eucalyptus. The visual and aesthetic effects of an altered landscape were transforming, but not to the detriment or loss of value of a magnificent open space. Furthermore, the fact that UC designated the area, in whole or in part, to be an Ecological Study Area would seem to

mandate a careful reappraisal of the matured landscape, now well established as integral to the area's ecology, including its trees, plants, mammals, birds, reptiles, and insects.

Any DEIS discussion of these two projects must delineate with precise care their boundary lines. It is conspicuous that the maps prepared for the scoping comments do not specifically cite Strawberry Canyon. Strawberry Canyon is significant landscape feature in the broadest of strokes, defining the spectacular geological formation and surrounds of the San Francisco Bay. Directly opposite the Golden Gate, Strawberry Canyon is a dramatic vista point that creates a natural gateway into the Diablo Range beyond.

Strawberry Creek, too, must be delineated. It is an important water body that discharges year round into the waters of the San Francisco Bay. Strawberry Creek's headwaters flow not only from the top of Strawberry Canyon, but also from the top of Blackberry Canyon — the location of the North Fork of Strawberry Creek — to join below the UC campus. Its underground sources seep or spring forth from reservoirs of water that are known to exist deep within the steep hillsides. Any abrupt change to the topography of the canyon ridges deserves careful assessment regarding potential environmental effect on water quality and soil erosion.

Because PDM-PJ-09-CA-2005-011 proposes "...felling all eucalyptus, Monterey pine, and acacia trees on approximately 60 acres..." at the top of Strawberry Canyon there is a cumulative factor that must be acknowledged. Below the ridge there are working facilities, including a large nanotechnology laboratory and a hazardous waste facility, and/or abandoned facilities that contain contaminated and biological materials, all having the potential to threaten environmental and human health. Given the probable occurrence of extreme weather patterns, or of landslides that do by definition occur in the Canyon, or of radical shifts in the earth due to fault activity on either the Wildcat Canyon Fault or the Hayward Fault, the proposal to *clear-cut established tree growth* above deserves very careful risk assessment.

But, the main objective of the proposal is questionable in itself. There is good reason to be concerned that an undertaking to clear-cut mature trees and leave wood chips would *not insure hazardous fire risk reduction at all*. Rather, the removal of established and mature groves of trees in one blow, could potentially become a more serious fire risk scenario. The residue of dry chips and/or the new growth of various non-native invasive brush, grasses, and young trees is, in fact, a more threatening potential for fueling urban wild fires that could rapidly spread out of control.

In regards to PMD-PJ-09-CA-2006-004, it is relevant to cite that the final version of UC's 2020 Long Range Development Plan (LRDP) contains several changes that were removed from an earlier draft of the LRDP proposing to construct 100 units of faculty housing in this hill area. The question must arise whether this FEMA proposal request is a pretext to resurrect, in due time, a new development proposal.

Most emphatically Save Strawberry Canyon joins a growing chorus of concerned citizens regarding the use of herbicides and pesticides in any region of the East Bay Hills. Because the four proposals, each, assume that there is a need for such harmful substances after large tree removal, it puts the entire project in question.

In regards to PDM-PJ-09-CA-2005-011 and PMD-PJ-09-CA-2006-004, a full assessment of the potential effects of the use of herbicides and pesticides must be fully evaluated. To apply toxic substances upon these landscapes at the crest of Strawberry and Blackberry Canyons, the source of Strawberry Creek flowing year round into the San Francisco Bay, is cause for serious concern. Because it can be assumed that Strawberry Creek is an already impaired body of water, any application of toxics within its watershed deserves full scrutiny.

Save Strawberry Canyon encourages an alternative that manages the landscape to reduce fire risk in a careful, thoughtful manner, embracing a long-term plan that establishes a continuum of hand labor, forestry training, and wise-use practices without any quick fixes depending upon clear-cutting or chemicals.

In closing let us express a query regarding whether URS is the most appropriate consultant to conduct this NEPA review. It may or may not be well known that there have been direct connections between URS, the Board of Regents, Lawrence Livermore Laboratory, and elected officials. Such connections could potentially cloud or compromise the thorough assessments needed for this major project review.

Thank you for your careful attention given to this application on behalf of NEPA and the public's expressed concerns.

Sincerely,

Lesley Emmington Jones, for
Save Strawberry Canyon