

# California Native Plant Society

**East Bay Chapter**  
P O Box 5597, Elmwood Station  
Berkeley, CA 94705

July 26, 2006

Phillip Woods, Principal Planner  
Planning Division  
1950 Parkside Drive, MS/53  
Building D, Permit Center  
Concord, CA 94519

**RE: Comments on the new Notice of Preparation for the City of Concord General Plan (CCGP) 2030**

Dear Mr. Woods:

Thank you for allowing us to participate in the General Plan process for the City of Concord. The following are comments of the California Native Plant Society, East Bay Chapter (CNPS), on the Notice of Preparation (NOP) for the City of Concord's General Plan (CCGP) - 2030.

The California Native Plant Society is a non-profit organization of more than 10,000 laypersons, professional botanists, and academics organized into 32 chapters throughout California. The Society's mission is to increase the understanding and appreciation of California's native plants and to preserve them in their natural habitat through scientific activities, education, and conservation. Fifty-four of our 1,165 East Bay CNPS members live in the Concord area, and an even greater number use the Lime Ridge open space and other parks within the city for recreation.

Our goal for participating in the NOP process is to assist the City of Concord in making appropriately sustainable decisions regarding future development, paying particular attention to potential land-use outcomes of the Concord Naval Weapons Station (CNWS). Our objective is to present suggestions and ask questions that will produce answers and ideas maximizing both environmental compliance and sustainable development.

The CNWS will comprise about 25% of the City's new land once it is fully transferred to the City of Concord. CNPS would like the City to continue in the development of a sustainable, community-driven plan for the redevelopment of the CNWS. As the City focuses efforts for this CCGP update on all areas outside of the CNWS, we hope that the development and preservation of CNWS will be considered in urban redevelopment projects. Some positive aspects of this process may include:

- The development of more infill areas already within the City Urban Limit Line (ULL), therefore allowing more flexibility for the CNWS planning process.



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- Zoning the CNWS as open space, allowing for a more complete DEIR for the CCGP, rather than simply leaving this vast area a “special planning zone”.
- Make a commitment to developing previously developed and impacted landscapes preferentially over land that still has the capacity to become biologically and socially valuable open space.
- Make a commitment to improving habitat for and around special status species such as the Diablo Helianthella (*Helianthella castanea*) near Lime Ridge Open Space and the southern City boundary and the northwestern Pond Turtle (*Clemmys marmorata marmorata*) at Newhall Community Park, by leaving habitat as open space (or “natural areas” parklands).
- Considering how areas near the edge of the CNWS may be developed under different scenarios ranging from no development in the CNWS, to development of 100% of the CNWS along the existing ULL.
- Begin biological, cultural, and natural resource surveys in the CNWS area, as allowed if zoned “open space”, therefore better preparing the city for ensuing questions concerning this relatively unknown landscape.
- Supporting the protection of Concord’s important viewsheds by considering entering into agreements with Pittsburg and Walnut Creek, discouraging development projects on ridgelines, in riparian areas, and other potential areas that may affect the City of Concord’s goals as a city.
- Consider removing the entire tidal portion of the CNWS from the City’s sphere of influence that is currently owned and managed by the Department of Defense.

We look forward to supporting Concord’s goals in becoming a world class city through the successful and sustainable redevelopment of the CNWS. The CCGP is an important first step in making this a reality.

Thank you for the opportunity to participate in this important proceeding and helping Concord maintain its commitment to environmentally conscious development. We look forward to being active participants in the EIR process. If you have any questions, please contact me at (510) 734-0335 or [conservation@ebcnps.org](mailto:conservation@ebcnps.org).

Sincerely,

Lech Naumovich  
Conservation Analyst  
California Native Plant Society  
East Bay Chapter



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