California Native Plant Society
East Bay Chapter
Conservation Committee

December 27, 2007

Michael Wright, Reuse Project Director
City of Concord Local Reuse Authority
1950 Parkside Drive, MS/1B
Concord, CA 94519

RE: Concord Community Reuse Project (CCRP) Notice of Preparation of Draft Environmental Impact Report (DEIR)

Dear Mr. Wright:

The East Bay Chapter of the California Native Plant Society (EBCNPS) greatly appreciates the opportunity to comment on the Concord Community Reuse Project (CCRP). The California Native Plant Society (CNPS) is a non-profit organization of more than 10,000 laypersons, and professional and academic botanists organized into 33 chapters throughout California. The mission of the CNPS is to increase the understanding and appreciation of California's native plants and to preserve them in their natural habitat through scientific activities, horticulture, education, and conservation.

Our chapter has a long history, dating back to 2004, of formal and informal conversations with the City of Concord regarding the potential reuse of the Naval Weapons Station. We appreciate the coordination and look forward to continuing to support the City in this process. Additionally, EBCNPS has been meeting with a technical group of local environmental organizations to help recognize potential environmental issues and opportunities relating to the reuse of the Naval Weapons Station. Please see the environmental platform, attached to the end of this document, which is intended to help the community and City understand some of our key concerns in the reuse process.

The notice of preparation for this DEIR is programmatic in nature. One of the goals of a programmatic EIR is to analyze cumulative impacts of a group of related projects. Since the reuse process will probably require decades of smaller projects, a well written programmatic document can greatly abbreviate subsequent project level EIRs if the document is comprehensive and adaptive. We hope a range of impacts will be presented and an appropriate mitigation and monitoring plan be produced to mitigate these impacts. A proper analysis at this scale can greatly improve mitigation success and increase support from the environmental community.

Native flora will be impacted by each of the seven alternatives presented in the initial study document. Adequate analysis of impacts to an area that is large and regionally significant requires that floristic and vegetation surveys and analysis be conducted at fine scales and at the appropriate times of year in order to get an accurate picture of species diversity and distribution. These surveys require field-based mapping and full disclosure in the EIR to aid in identification

of areas that require protection under CEQA. Surveys require adequate advance planning and should follow the guidelines set forth in the following publications: California Native Plant Society's Botanical Survey Guidelines[1], California Department of Fish and Game's Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities[2], and U.S. Fish and Wildlife's Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants[3].

If suitable habitat is present, focused protocol-level special-status species surveys must be conducted at the site prior to issuing permits. These surveys must be conducted during the appropriate blooming periods of identified target species in order to adequately identify and map potentially occurring populations and to meet CEQA compliance. We have attached a list of current and historical special status plant taxa known from the Concord area.

EBCNPS **strongly** urges the City to initiate multi-year botanical surveys so that when project specific concerns arise, there is an accurate, recent collection of appropriate surveys that specifically serve the purpose of this reuse process. Although EBCNPS highly recommends the use of old surveys for comparison studies, with recent changes in land use and management, new surveys must be conducted in order to determine the quality of the habitat in the landscape. Additionally, these surveys can help assess the need for interim management activities that will allow for preserve of valuable resources in historically managed landscapes.

Finally, EBCNPS hopes that this process and reuse plan will continue to provide opportunities for community participation and funding for community projects that can help make the CCRP a success for all interested parties. The City of Concord has been receptive and open to community concerns and we hope that this model will continue throughout the reuse process. Thank you for your consideration of the above comments. Please do not hesitate to contact me with questions at (510) 734 0335.

Sincerely,

Lech Naumovich
Conservation Analyst
California Native Plant Society
East Bay Chapter
conservation@ebcnps.org

[1] California Native Plant Society (CNPS). 2001a. *Inventory of Rare and Endangered Plants of California.* 6th Edition. Rare Plant Scientific Advisory Committee, David P. Tibor, Convening Editor. Sacramento, California. 388 pp.

[2] CDFG. 2000. *Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities.* Sacramento, CA.

[3] USFWS. 2000. Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants.

Environmental Platform
Concord Naval Weapons Station Reuse Plan

1) Develop 20 Percent—a Huge Area—of the Concord Naval Weapons Station and Preserve 80 Percent as Open Space.

We endorse the community of Concord's demand that 80 percent of the Weapons Station be preserved as public parks and open space. Approximately 65 percent of the Weapons Station should be included in a regional park and 15 percent in a community park. This would protect the Los Medanos Hills, the ridgeline between central and eastern Contra Costa County, and Mount Diablo Creek while buffering existing neighborhoods and protecting sensitive resources. Much of the Weapons Station is not developable, thus 80 percent is a reasonably-sized park area. Concord's hillside standards, which protect slopes, will require protection of a significant part of the site, and the federal and state Endangered Species Acts will require protection of large areas, as well.

Twenty percent (20%) of the Weapons Station, or approximately one thousand acres will be available for development. This is a very large development area. For comparison, the entirety of downtown Concord is well under 1000 acres.

2) Create a Sustainable, Economically Viable Community.

The Reuse Plan should strive to make the Weapons Station an economically viable model of sustainable development for the entire Bay Area, the state, and the nation. The Reuse Plan should include a high level of affordable and workforce housing. Concord's General Plan Housing Element states that 57 percent of new housing should be available for low-, very low-, and moderate-income households, and the Reuse Plan should support this goal while focusing on non-profit housing providers who maintain affordable housing in perpetuity. Construction firms should be required to pay prevailing wages guaranteed through Project Labor Agreements. The Reuse Plan should concentrate on green design, open space preservation, and natural resource restoration. It should also focus on renewable energy sources and remediate contaminated areas. The Navy's responsibility for remediation of contaminated areas must not be transferred to private owners without guarantees that remediation will be carried out and that it will meet the standards applicable to the land use specified in the Reuse Plan.

3) Designate a World Class Regional Park: The Entire Area East Of Mount Diablo Creek Should Be Protected

Concord, the largest city in Contra Costa County, is the only city in the East Bay without a regional park. Most of Weapons Station's open space should become a regional park for "passive recreation" (walking, biking, picnicking, etc.) and for the public benefit of the entire East Bay region. The natural landscape and wildlife corridor of the Los Medanos Hills as well as all land east of Mount Diablo Creek and south of Highway 4 should be permanently preserved as open space.

Open space and trails have been shown to greatly increase property values and improve residents' quality of life. Development of the Weapons Station must include a funding mechanism to support operation and maintenance of this new, much-needed regional park.

4) Design a Diverse, Vibrant, Walkable, Bikeable Community.

To make Concord a better place to live and to use our valuable resource of Weapons Station land wisely, all new development should be in the form of walkable neighborhoods that include a mix of jobs, shops, and homes people can afford. The developed area should include different types of homes to meet the needs of singles, seniors, and families, as well as people with a range of incomes. Development that includes retail and office space should be clustered around the North Concord BART station to create a vibrant new neighborhood and make it easy for people to commute and do errands near their homes. In areas farther from BART, development should remain compact and include plenty of homes to make it possible for bus service to be frequent and efficient. Throughout the area, trails and bike lanes should be included to permit residents to get around easily without having to drive for every trip. The developed area should include amenities and services to meet family and community needs including parks, schools, health clinics, libraries, cultural and community centers, historic sites, and small businesses. Additionally, a comprehensive parking management policy should be developed so valuable land is not wasted on empty, unused parking lots and more land can be saved for schools, open space, and community facilities.

5) Build No New Roads East of Mount Diablo Creek.

A road east of Mount Diablo creek would separate wildlife and recreational users of the creek corridor from the protected Los Medanos Hills. Any major vehicle roads or transit should be west of the creek except for regional park access. Non-motorized commuting and recreation can alleviate traffic. Multi-use trails throughout the Weapons Station, including the linear park buffer, should provide access to open space, recreation trails, and bike paths and extend beyond the Weapons Station boundaries to regional trail networks.

6) Create Concord's Own "Golden Gate Park": A Linear Public Park Buffering Existing Neighborhoods.

Central Park is 800 acres and Golden Gate Park is 1000 acres in size. A major linear park on 15 percent of the Weapons Station at its western boundary will buffer existing neighbors, who will face the worst impacts, and help integrate the project with the city. It will serve residents of the entire city and region, while enhancing economic values and connecting the North Concord BART station with the regional park. The park can be developed over decades and include cultural and other facilities such as museums and sports fields for the community.

7) Protect and Restore Mount Diablo Creek and Other Wildlife Corridors.

We endorse the ecological restoration of the entire length of Mount Diablo Creek and recommend at least a 300-foot buffer on both sides of the creek, including north of Highway 4. Mount Diablo Creek, an important wildlife corridor, should be preserved and restored without any major realignment. Any upgrades to roads and other infrastructure that cross the creek should be designed to ensure that they preserve and enhance wildlife corridors and that they do

not create barriers to the movement of fish and wildlife. Wildlife passage and recreational trail crossings should be part of planning for the Reuse Area's transportation and road network.

8) Integrate Reuse of the Weapons Station to Make Concord a World-Class City.
The Weapons Station Reuse Plan should be integrated with existing plans for the City of Concord. Coordinating downtown redevelopment and urban infill with the reuse of the Weapons Station can work to make Concord a *world class city*. Onsite amenities and financial benefits should be utilized to integrate the Weapons Station with the rest of the city to avoid creating an island or a "New" Concord. The city should also consider implications of this reuse process on the greater East Bay region.

9) Preserve Sensitive Resources and Encourage Environmental Education.
Preserve the natural and cultural resources of the area—unique vegetation, heritage trees, endangered species, and sensitive habitats—that make it undeniably the "East Bay." Use appropriate native plants and drought-resistant landscaping for development. Encourage education and interpretation of unique natural and cultural resources. It is especially important to survey, disclose, and research the historical, natural, and cultural resources north of Kirker Pass and south of Highway 4 and plan appropriately.

10) Incorporate Community-Based Planning for Major Projects.
In order to assure that all of the above goals are implemented and the Naval Weapons Station is planned according to the community's needs, it is important that future land use decisions about the Weapons Station are made through a community-based planning process. An extensive community-based planning process, sometimes called a charette, should be conducted for the following specific areas: the half-mile radius around the North Concord BART station, the area north of Highway 4, any planned transit villages, and the area between Willow Pass Road and Bailey Road. During the reuse planning process, the city has been conducting a series of public workshops to solicit community input. This public community planning process should continue even after the land is transferred and development agreements are in place to ensure that the community has a say in the final design of the projects. Through this process, decision-making will be more transparent and will generate more opportunities for collective visions and aspirations for social and economic justice.

The 5,000-acre Inland Area of the Concord Naval Weapons Station is one of the largest remaining developable areas in the entire San Francisco Bay region. Much of it is relatively pristine habitat for native plants and wildlife that has been preserved due to its status as a military base. This natural treasure deserves our concerted efforts to protect its unique vegetation, endangered species, sensitive habitat, and open space value and to plan its development in an environmentally and socially responsible manner.

The following recommendations have been developed by members from the California Native Plant Society, Friends of Mount Diablo Creek, Greenbelt Alliance, Mount Diablo Audubon Society, Save Mount Diablo, and Sierra Club San Francisco Bay Chapter. As a coalition of environmentally-minded organizations and citizens, we support reuse of the Concord Naval Weapons Station to create a sustainable, economically-viable mixed-use development that preserves 80 percent of the land as open space and public parks and protects wildlife corridors, important plant habitat, and historical and cultural resources through a process that ensures environmental, social, and economic justice.

CEQA-Protected Rare and Unusual Plants of the Concord Area

(Statewide Rare Plants in Upper Case)
February 20, 2003

Rank in East Bay	Species	Common Name	Habitat
A1	Allium crispum	crinkled onion	Dry Open Slopes; Serpentine; Misc. habitats
A1	Amsinckia tessellata var. gloriosa	tessellate fiddleneck	Sand or Sandstone; Misc. habitats
*A2	ANDROSACE ELONGATA SSP. ACUTA	California androsace	Dry Open Slopes; Grassland
*A2	ARCTOSTAPHYLOS AURICULATA	Mt. Diablo manzanita	Chaparral; Sand or Sandstone
*A2	ASTER LENTUS	Suisun marsh aster	Misc. Wetlands
A1	Astragalus didymocarpus var. didymocarpus (A. gambelianus is more common)	two-seeded milkvetch	Grassland
A2	Bidens laevis	bur-marigold	Freshwater Marsh; Misc. Wetlands
*A2	BLEPHARIZONIA PLUMOSA	big tarplant	Grassland; Scrub
*A2	CALOCHORTUS PULCHELLUS	Mt. Diablo fairy-lantern	Chaparral; Serpentine; Woodland
*A2	CALOCHORTUS UMBELLATUS	Oakland star-tulip	Chaparral; Scrub; Woodland
A2	Calystegia sepium ssp. limnophila	hedge bindweed	Misc. Wetlands
A2	Camissonia intermedia	small primrose	Burns; Scrub
A1	Carex globosa	round-fruited sedge	Misc. habitats
A1	Carex multicostata	many-ribbed sedge	Misc. habitats
A1x	Castilleja ambigua ssp. ambigua (historical-1937)	Johnny-nip	Coastal Bluff; Grassland
*A1	CASTILLEJA RUBICUNDULA SSP. RUBICUNDULA(?)	pink cream sacs	Grassland
A2	Centromadia pungens ssp. maritima (Hemizonia pungens ssp. maritima in Jepson Manual) (ssp. pungens is more common)	common spikeweed	Salt Marsh
A2	Cicendia quadrangularis	timwort	Grassland
A1	Cicuta maculata var. bolanderi	water hemlock	Brackish Marsh; Salt Marsh
A1	Collinsia bartsiifolia var. bartsiifolia	white Chinese houses	Sand or Sandstone
*A2	CORDYLANTHUS MOLLIS SSP. MOLLIS	soft bird's-beak	Brackish Marsh; Salt Marsh
A2	Cornus glabrata	brown dogwood	Riparian
A1	Cucurbita foetidissima	calabazilla	Gravel; Rock, Tallus or Scree; Sand or Sandstone
A2	Deinandra lobbii (Hemizonia lobbii in Jepson Manual)	three-rayed tarweed	Misc. habitats
A2	Deschampsia cespitosa ssp. holciformis	tufted hairgrass	Misc. Wetlands
A1x	Downingia ornatissima var. eximia	Solano downingia	Vernal Pools; Misc. Wetlands

Rank in East Bay	Species	Common Name	Habitat
A1	Elatine brachysperma	waterwort	Freshwater Marsh; Misc. Wetlands
*A1	ERODIUM MACROPHYLLUM	round-leaved filaree	Grassland; Scrub
A1	Eryngium articulatum	coyote-thistle	Freshwater Marsh; Riparian; Misc. Wetlands
A1	Glaux maritima	sea-milkwort	Alkali areas; Salt Marsh; Misc. Wetlands
A1	Glyceria leptostachya	Davy's mannagrass	Freshwater Marsh; Riparian
A1	Guillenia flavescens	yellow-flowered thelypodium	Serpentine
A2	Helenium bigelovii (H. puberulum is more common)	Bigelow's sneezeweed	Brackish Marsh; Freshwater Marsh
*A2	HELIANTHELLA CASTANEA	Diablo helianthella	Chaparral; Grassland; Woodland
A1	Helianthus gracilentus	slender sunflower	Burns; Dry open Slopes
A2	Hemizonia lobbii (See Deinandra)		
A2	Hemizonia pungens ssp. maritima (See Centromadia)		
A2	Hoita macrostachya	California hemp	Freshwater Marsh; Riparian
*A1	LASTHENIA CONJUGENS	Contra Costa goldfields	Alkali areas; Vernal Pools; Misc. Wetlands
A2	Lasthenia glaberrima	smooth goldfields	Vernal Pools; Misc. Wetlands
*A2	LATHYRUS JEPSONII VAR. JEPSONII	Delta tule pea	Brackish Marsh; Freshwater Marsh
A1x	Layia glandulosa	white layia	Sand or Sandstone
A2	Lepidium dictyotum var. acutidens	sharp-toothed pepper-grass	Alkali areas
A2	Leptochloa fascicularis	bearded sprangletop	Misc. Wetlands
A2	Lessingia glandulifera var. glandulifera	valley lessingia	Forest; Sand or Sandstone
*A2	LILAEOPSIS MASONII	Mason's lilaeopsis	Brackish Marsh; Freshwater Marsh
A1x	Limnanthes douglasii ssp. douglasii (historical-1940)	meadowfoam	Vernal Pools; Misc. Wetlands
A1	Limnanthes douglasii ssp. nivea	meadowfoam	Vernal Pools; Misc. Wetlands
A2	Linanthus dichotomus	evening snow	Gravel; Rock, Tallus or Scree; Sand or Sandstone; Serpentine
A1	Linanthus pygmaeus ssp. continentalis	pigmy linanthus	Misc. habitats
A1x	Linum lewisii var. lewisii (historical-1936)	western blue flax	Dry Open Slopes
A2	Lithophragma bolanderi	Bolander starflower	Misc. habitats
A1	Lupinus affinis	lupine	Misc. habitats
A1x	Lupinus luteolus	butter lupine	Misc. habitats
*A1	MALACOTHAMNUS HALLII (M. fasciculatus in Jepson Manual)	Hall's bush mallow	Chaparral
A1	Malacothrix coulteri	snake's-head	Grassland; Scrub; Sand or Sandstone
*A1	MICROPUS AMPHIBOLUS	Mt. Diablo cottonweed	Dry Open Slopes; Grassland; Rock, Tallus or Scree

Rank in East Bay	Species	Common Name	Habitat
A1	Mimulus tricolor	tricolor monkeyflower	Vernal Pools
A2	Minuartia californica	California sandwort	Chaparral; Dry Open Slopes; GrasslandRock, Tallus or Scree; Sand or Sandstone; Serpentine
*A1	MONARDELLA VILLOSA SSP. GLOBOSA (ssp. villosa is more common)	robust monardella	Chaparral; Woodland
A2	Navarretia atractyloides	holly-leaved navarretia	Rock, Tallus or Scree; Sand or Sandstone areas
*A2	NAVARRETIA COTULIFOLIA	cotula navarretia	Misc. Wetlands
A1	Navarretia viscidula	sticky navarretia	Freshwater Marsh; Grassland; Sand or Sandstone; Vernal Pools
A2	Oenothera deltoides ssp. cognata	desert evening-primrose	Grassland; Sand or Sandstone
*A2	OENOTHERA DELTOIDES SSP. HOWELLII	Antioch Dunes evening-primrose	Sand or Sandstone areas; Scrub
A2	Penstemon centranthifolius	scarlet bugler	Chaparral; Sand or Sandstone; Woodland
A1	Pentachaeta alsinoides	tiny pentachaeta	Grassland
A2	Phacelia tanacetifolia	tansy phacelia	Gravel; Sand or Sandstone
A2	Plagiobothrys infectivus	dye popcornflower	Misc. habitats
A1	Plantago maritima	Pacific seaside plantain	Salt Marsh
A1	Plantago subnuda	Mexican plantain	Coastal Bluff; Misc. Wetlands
A2	Potentilla anserina ssp. pacifica	Pacific silverweed	Misc. Wetlands
A1	Rumex occidentalis	western dock	Misc. Wetlands
A1	Senecio hydrophilus	alkali-marsh butterweed	Misc. Wetlands
A2	Sesuvium verrucosum	sea-purslane	Alkali areas
A2	Sidalcea diploscypha	fringed sidalcea	Grassland; Woodland
A1	Silene antirrhina	snapdragon catchfly	Burns; Sand or Sandstone; Misc. habitats
A2	Spergularia macrotheca var. leucantha	large-flowered sand spurry	Alkali areas; Vernal Pools
A2	Stephanomeria elata	stephanomeria	Dry Open Slopes
A2	Trifolium wormskioldii	cow clover	Misc. Wetlands
A2	Triglochin striata (T. maritima is more common)	three-ribbed arrowgrass	Salt Marsh
*A1x	TROPIDOCARPUM CAPPARIDEUM (historical-1981 but not seen since)	caper-fruited tropidocarpum	Alkali areas; Grassland
A2	Tropidocarpum gracile	slender tropidocarpum	Alkali areas; Grassland
A1x	Vicia hassei (historical-1891)	slender vetch	Grassland; Scrub
A1	Vicia ludoviciana var. ludoviciana	slender vetch	Scrub; Woodland

NOTE: Plant species followed by "(?)" have taxonomic or distribution problems and it is not clear if they occur here.

Dates indicated for historical species refer to last known record in the Alameda-Contra Costa Counties area.

Explanation of Ranks

***A1 or *A2**: Species in Alameda and Contra Costa counties listed as rare, threatened or endangered statewide by federal or state agencies or by the state level of CNPS.

A1x: Species previously known from Alameda or Contra Costa Counties, but now believed to have been extirpated, and no longer occurring here.

A1: Species currently known from 2 or less regions in Alameda and Contra Costa Counties.

A2: Species currently known from 3 to 5 regions in the two counties, or, if more, meeting other important criteria such as small populations, stressed or declining populations, small geographical range, limited or threatened habitat, etc.