



# California Native Plant Society

East Bay Chapter  
Conservation Committee

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February 16, 2007

Kristin Vahl  
Assistant Planner  
City of Pittsburg Planning Department  
65 Civic Ave.  
Pittsburg, CA 94565

## **Re: Draft Hillside Development Standards and Design Guidelines**

Dear Mrs. Vahl:

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.

The East Bay Chapter of the California Native Plant Society (EBCNPS) has been following Pittsburg's recent Hillside Ordinance (PHO) development process. Our hope was that this process would create a strong, legally binding hillside ordinance that would allow for the protection of native habitats, native species, and Pittsburg residents. Since there is little to no acknowledgement of the role soil type, soil structure, and native plants have on slope stability, we would like to ask for your inclusion of these elements into the process.

Soils are unique in nature such that their formation is often a process that occurs in glacial time scales. Simply put, soil structure develops over millions of years. Our Pittsburg soils in conjunction with unique climatic influences have produced a community of plants that grow on hillsides and help stabilize them. We believe it is important to protect the hillside soil structure, first and foremost, which allows for native flora to populate the hillsides. Once soils are moved, compacted, filled, cut and otherwise modified, the soils' ability to hold up the slope deteriorates. This deterioration sets up weed invasion, and among other events, landslides. Many of the weedy non-native shrub and grass species do not possess the extensive root structure with greater soil-holding capacity that the native species do.

As entities vie for projects that offer to develop these hillsides, soils must be considered from both a biological perspective and a community safety perspective. Landslides are a common ecological phenomenon in the Bay Area, and current research implicates that global warming will cause longer wet and dry periods, thus increasing potential for landslide

occurrences<sup>1</sup>. Development on, or directly below soils defined by the USDA as “erodable” or “highly erodable” can put your citizens and native plant flora at great risk.

The slides that occurred as recently as half a year ago in Pittsburg’s Vista del Mar subdivision should be an indication of the threat of slides during construction and soil modification. The following is a direct quote from the January 18<sup>th</sup>, 2007 letter from Kleinfelder to the City Attorney [RE: Geologic Engineering Input Pertaining to the Potential Causes of the Reactivation of Landslide within the Vista Del Mar Residential Development in Pittsburg California]. This statement clearly indicates the dangers of building on these slopes and how quickly the problem can affect the greater Pittsburg population.

*“During grading for the new Vista Del Mar residential development in Pittsburg two landslides were activated that created movement at the top of the slope that extended into the existing adjacent San Marco subdivision Both landslides are situated within a larger landslide complex.”*

Pittsburg has an opportunity to halt any projects that may ultimately result in unintended consequences that can greatly affect its residents. Soils are complex, and building on top of unstable ones is an even more complex, risky enterprise. We ask your staff to consider disallowing ALL development on or above erosive soil types and any slope greater than 30% as determined by a peer-reviewed process by USDA staff and other experts. Please feel free to contact us with questions at 510-734-0335.

Sincerely,



Lech Naumovich  
Conservation Analyst  
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510 734 0335

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<sup>1</sup> California Energy Commission. 2003. *Climate Change and California*. Available at [http://www.energy.ca.gov/reports/2003-11-26\\_100-03-017F.PDF](http://www.energy.ca.gov/reports/2003-11-26_100-03-017F.PDF)