

California Native Plant Society

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

June 16, 2006

Joe Light
City of Richmond Planning Department
1400 Marina Way South
Richmond, CA 94804

Re: EBCNPS Comments for the DEIR on Forrest Green Project

Dear Joe Light:

The California Native Plant Society thanks the City of Richmond for the opportunity to comment on the DEIR for the Forrest Green project. CNPS is a statewide organization of some 10,000 members whose mission is to conserve and protect the native plant species and native plant communities in 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 comments for the Forrest Green DEIR are based on the biological information provided in the DEIR. Because notification of this project was through a third party, only days before the DEIR comments were due, EBCNPS has not had the full 45 days to ground-truth the species list nor the plant community maps. EBCNPS reserves the right to withdraw comments if additional field-based information challenges the existing biological opinion.

The following letter lists some preliminary concerns of the East Bay Chapter of the California Native Plant Society regarding the Forrest Green Project.

- The Loma Prieta Hoita (*Hoita strobilina*) is a perennial herb endemic to California. In fact, the Loma Prieta Hoita's distribution is limited to 6 counties in the Bay Area¹. This native favors closed canopy, or mostly closed canopy, riparian areas with Coast Live Oak as the dominant overstory plant, with chaparral species occupying the understory. CNDDDB records show only 23 occurrences of the plant in the United States². With such a limited distribution of this plant, EBCNPS finds that the ONLY acceptable mitigation measure that is reasonable is AVOIDANCE.

¹ Calflora: Information on California plants for education, research and conservation. [web application]. 2006. Berkeley, California: The Calflora Database [a non-profit organization]. Available: <http://www.calflora.org/>. Accessed: Jun 15, 2006

² California Department of Fish and Game (DFG). 2006. California Natural Diversity Database (CNDDDB) record for *Hoita strobilina*. Sacramento, CA. Accessed: June 15, 2006.



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- Since the Loma Prieta Hoita is located in mesic, riparian areas, any impact on hydrology may affect the populations on site and further downstream. Mitigation measures MUST ensure that the existing populations are not adversely affected by 1) “un-seasonal” run-off, 2) increased non-point source pollutants, and 3) a change in microclimate to a drier, more xeric habitat.
- Little is known about the Loma Prieta Hoita, and even less is known about successful transplantation and reseeded of this species. CEQA guidelines require that mitigation measures MUST include “feasible alternatives or feasible mitigation measures available which would substantially less the significant environmental impact”³. The Richmond population is flourishing, with a recorded 3000 individuals found distributed among seven separate populations⁴. The onus of maintaining the number of individuals and distinct populations of this species is placed on the City Council and staff who have the ability to “not approve the project”⁵ based on questionable mitigation procedures.
- EBCNPS requests on-site mitigation for the plant species on the attached list as well as any other federal or state listed species and CEQA protected plant species found during surveys. Harmful impacts on these species should be avoided.
- Restoration work and mitigation work will utilize only certified native plants grown from locally collected seed in order to maintain the genetic integrity of the existing populations. Best management practices will be utilized in order to restrict any introduction of weeds and invasive species. If such new species are found post-construction, the abatement and removal of this damage needs to be addressed in mitigation practices.
- EBCNPS believes that native habitats are worth preserving, and developing around intact plant communities. The DEIR finds native Purple Needlegrass communities, coast live oak woodlands, and chaparral areas don’t require protection by law, but do require preservation through the City of Richmond’s OSC-A.2 General Plan Policy: “Preserve unique plant communities and wildlife habitats”⁶.

³ California Environmental Quality Act (CEQA). 2005. Section 21002.

⁴ California Department of Fish and Game (DFG). 2006. California Natural Diversity Database (CNDDDB) record for *Hoita strobilina*. Sacramento, CA. Accessed: June 15, 2006.

⁵ CEQA. 2005. Section 21002.

⁶ City of Richmond. 1994. Volume One of the Richmond General Plan. Richmond, CA



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EBCNPS looks forward to submitting further comments through the EIR process. Questions and concerns can be addressed to the Conservation Analyst. We look forward to working with you on this process.

Sincerely,

Lech Naumovich
East Bay Conservation Analyst
California Native Plant Society
(510) 734 - 0335

