



California Native Plant Society

East Bay Chapter Conservation Committee

November 5, 2007

Elizabeth FitzZaland
MIG Consultants

Lori Reese-Brown
City of Richmond

RE: Open Space Policies for Richmond General Plan Update

Dear Mrs. Reese-Brown and Mrs. FitzZaland:

The East Bay Chapter of the California Native Plant Society (EBCNPS) appreciates the opportunity to submit comment regarding policies for the Richmond General Plan. The California Native Plant Society (CNPS) is a non-profit organization of more than 10,000 laypersons, professional, and academic botanists organized into 32 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, education, and conservation.

EBCNPS has been active in commenting on quite a few general plans and we believe that strong, precise policy statements can help the City and its residents better understand what will happen in the next 20-30 years. Given our experience, we provide the following policy ideas and recommendations, specifically regarding **Conservation, Natural Resources and Open Space Goals and Policies**.

We appreciate many of the goals of the 1994 plan and hope you will retain these goals in particular:

- OSC-B Protect open water, mudflats and all tidelands and riparian woodlands to the maximum extent feasible from unnecessary Bay fill and dredging. (VI)
- OSC-C Preserve and enhance the marshes and tidelands. (VI)
- OSC-F Preserve the natural topographical form of the Berkeley Hills, San Pablo Ridge, El Sobrante Ridge, Point Potrero and San Pablo Peninsula. (VI)
- OSC-H Preserve and enhance the potential landmark character of all creeks. (VI)
- OSC-I Strictly control runoff from new development, particularly on San Pablo and Wildcat Creeks, to prevent flooding, erosion, and destruction of natural waterways, to reduce public costs for flood control work, and to preserve scenic quality. (VI)
- OSC-N Prevent development in areas where landslides cannot be adequately repaired. (VI)
- OSC-Q Preserve natural open-space areas for visual open space, nature study, community shaping, conservation of natural resources, and conservation of native plant and animal communities. (VIII)**
- OSC-R Keep, at least as an interim measure, the agricultural use of lands such as commercial nurseries and grassland (grazing). (VIII)

OSC-T Ensure the comprehensive planning of regional open space. (IX)

GOALS

A more concise and well understood terminology for OSC-A is recommended below. We also would recommend a more positive tone to this first goal.

CURRENT: OSC-A - Preserve environmental conditions that, if disturbed, would destroy important wildlife habitats and valued natural features. (VI)

PROPOSED: OSC-A –Preserve the form and function of the natural environment, reasonably avoiding any harm to native wildlife, plants, and habitats.

Conservation success is substantially increased when a specified, scientifically reviewed plan guides decision making. We recommend the use of two recent regional conservation plans developed for the Bay Area Open Space Council for the guidance of conservation planning as written in this sample goal instead of the current OS-T:

PROPOSED: OS-T Two regional conservation plans will be used in order to provide guidance for current and future conservation efforts within the city. Information and recommendations will be implemented from these plans in conservation efforts. These two plans are 1) the Baylands Ecosystem Goals Project and 2) the Upland Habitat Goals Project.

A renewed commitment to natural areas is extremely important and may help instruct developers interesting in trying to bend existing goals and policies. It has been the case in recent years that two projects have aimed to alter the existing landscape for development purposes (Canyon Oaks II and Forest Green). Adherence to strong planning would eliminate development proposals that attempt to undermine the community’s wish for preservation of open space.

PROPOSED: OSC-U (new) – Maintain the current extent of Open Space, Agricultural land, and Parks by not allowing the significant conversion and development of these areas.

POLICIES

Lawns, private gardens and backyards have been found to account for around 33% of water use in some areas. Please consider the community benefit for planting locally appropriate native plant species and maintaining smarter watering regimes.

PROPOSED OSC-J.4 (new): Require any new development or landscaping improvement projects to utilize locally appropriate native plants and watering regimes in order to minimize wasting water on landscaping.

The conservation of many of our rare and threatened species is severely imperiled by invasive, non-native plants. The reasonable management of areas where there is invasion should be considered a priority. Since prevention is the simplest and most cost-effective manner to reducing weeds, we recommend the following prevention and maintenance activities.

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PROPOSED OSC-Q.5 (new): Invasive, non-native plants identified as “A-list” by the California Invasive Plant Council (CAL-IPC) can greatly affect aesthetics, fire-danger, and native habitats. Promote wise removal of “A-list” invasive plants in City owned and maintained parcels.

PROPOSED OSC-Q.6 (new): Promote education on the spread of invasive species and institute a “clean vehicle” policy with regard to heavy equipment and maintenance equipment. The “clean vehicle” policy would require the cleaning (washing, removal of soil and seeds) of vehicles after working in areas with invasive plants.

Engaging the community in the outdoors and stewardship activities can be of great benefit to the City. Many groups in the bay area that have outreach programs have developed programs for environmental education which could bring citizens together and increase environmental stewardship.

PROPOSED OSC-Q.7 (new): Support organizations, groups, and efforts to help the citizens of Richmond become more aware of their natural resources and aid in the wise management of these areas.

Thank you for your consideration of the above comments. We appreciate your time and energy in making Richmond a better place for people to co-exist with the natural environment.

Please do not hesitate to contact me with questions at (510) 734 0335.

Sincerely,



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CC: Loni Hancock, State Representative
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