

California Native Plant Society

East Bay Chapter

P O Box 5597, Elmwood Station. Berkeley, CA 94705

September 6, 2006

Secretary Dirk Kempthorne
Department of the Interior
1849 C Street, N.W.
Washington DC 20240
202-208-3100

RE: US Department of Interior - Cooperative Conservation Listening Sessions of 2006

Dear Secretary Kempthorne:

The East Bay Chapter of the California Native Plant Society greatly appreciates the opportunity to comment on the *Cooperative Conservation Listening Sessions* via written comments. The California Native Plant Society (CNPS) is a non-profit organization of more than 10,000 laypersons and professional 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.

Pursuant to the mission of protecting California's native flora and vegetation, CNPS submits the following comments to the Cooperative Conservation Listening Sessions:

1. Voluntary, cooperative conservation is an important tool, but it is not a substitute for our nation's environmental laws such as the Endangered Species Act and Clean Water Act. These laws are the foundation of my conservation work allowing for developers, governmental agencies, and businesses alike to know there is a requirement to uphold certain biological standards that the layperson may not be familiar with. **All of the federal laws were enacted because inaction was forging an eminent crisis** – the need to protect our generation and many future generations against haphazard environmental damage and exposure to toxic chemicals. Our conservation laws have paved the way for cooperative conservation by setting goals for recovering endangered species, protecting our nation's natural treasures, and cleaning up the nation's rivers and waterways.

2. The Endangered Species Act is a safety net for wildlife, fish, and plants on the brink of extinction. The act has been successful in helping to prevent the extinction of the American bald eagle, as well as many other species of fish, plants and wildlife. My letters, communications, and attempts to protect imperiled species through non-confrontational means would become less heeded, and much less effectual, if we lose any more ground on the Endangered Species Act. **Notably, most endangered**



Dedicated to the preservation of California native flora

California Native Plant Society

plants are not charismatic and they are less likely conservation targets and “cooperative conservation” targets, due to their less well known and understood ecology. More often than not, preserving and protecting rare plants is a much more difficult task than preserving animal species, yet it is just as important, if not more important. We owe it to our children and grandchildren to be good stewards of the environment and leave behind a legacy of protecting endangered species and the special places they call home.

3. The Endangered Species Act works because over 99% of listed species are still extant. The ESA needs to remain strong, thus allowing for more listing and research on plants and animals we know so little about, but are so limited. In California alone, there are 218 plants¹ that are reduced to such small and particular environments that if it were not for the California Endangered Species Act protecting them, they may very well be gone. Federal protection under ESA exists only for a limited percentage of these plants even though many of these are as rare as any current federally listed species. I urge your administration to work to fund the act's core programs, limit frivolous law suits, and push cooperative conservation as a complement to these primary efforts. Thank you for considering my comments.

Please feel free to contact me with any additional questions or comments at conservation@ebcnps.org.

Sincerely,

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

CC: Governor Schwarzenegger – State of California
Susan Moore, Field Supervisor Sacramento Fish and Wildlife Office
Emily Roberson, Native Plant Conservation - Center for Biological Diversity
Mark Rockwell, California Director - Endangered Species Coalition

¹ California Department of Fish and Game. **2006**. Threatened and Endangered Plants – Habitat Conservation Planning (website). http://www.dfg.ca.gov/hcpb/species/t_e_spp/teplant/teplanta.shtml. Accessed September 6, 2006.



Dedicated to the preservation of California native flora