



Marin Chapter
California Native Plant Society



CALIFORNIA
NATIVE PLANT SOCIETY

James Raives
Marin County Open Space District
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Re: Draft Tiered Program Environmental Impact Report (DTPEIR) for the Vegetation and Biodiversity Management Plan (VBMP)

Dear Mr. Raives:

The following comments are submitted on behalf of the Marin Chapter of the California Native Plant Society (Marin CNPS) regarding the Draft Tiered Program Environmental Impact Report for the District's Vegetation Management and Biodiversity Plan (VBMP). The California Native Plant Society is an organization of nearly 10,000 members statewide dedicated to conserving native plants and their natural habitats and to increasing the understanding, appreciation, and horticultural use of native plants. Marin CNPS has 350 members.

Marin CNPS's August 16, 2013 comment letter on the Administrative Draft of the VBMP is incorporated by reference herein and separately attached. At that time, we commended the Plan for its balanced, science-based approach that comprehensively addresses several vegetation-related issues at the same time: protection of natural resources, control of invasive species, fire safety, climate change, and forest health.

CNPS now finds that the DTPEIR presents a thorough analysis of the activities planned in the VBMP, potential impacts on the natural resources and public safety and such mitigating measures as may be necessary. In particular, we support the District's commitment to the restoration of native vegetation and natural habitats on Open Space lands, removal of invasive plants, adherence to the principles of Integrated Pest Management, and its new approach to fuel-breaks.

Further, we agree with the DTPEIR's conclusion that the VBMP, as modified by appropriate mitigating measures, is the environmentally superior alternative.

We add the following specific concerns:

- *Biological resources and special status plants*

First, CNPS appreciates that in a general planning document such as this one, impacts and mitigating measures pertaining to specific management actions can only be recognized and formulated at a later date and on a case-by-case basis. Thus, we accept the need to defer the development of specific plans to Treatment Programs to be prepared wherever management activities are needed within the 100-foot buffer zones around special status plants, sensitive plant communities and wetlands. We believe, however, that final TPEIR should expressly require approval of such plans by supervisory-level District staff or by the District board of directors.

Second, Marin CNPS suggests that the final TPEIR include mandatory sanitary practices for equipment and vehicles of both the County and its contractors so as to prevent further introduction of invasive exotic plants.

- *Hazards of herbicide use to control invasive plants*

CNPS strongly supports Integrated Pest Management (IPM) as the proper approach to the use of herbicide for weed control. CNPS official policy statements on these issues can be found at http://www.cnps.org/cnps/conservation/pdf/IWM_policy.pdf and http://cnps.org/cnps/conservation/pdf/Herbicide_policy.pdf.

IPM, as defined in our policy statements and by the California Invasive Plant Council (Cal-IPC), calls for conservative, targeted use of herbicides for specific restoration projects, along with mechanical, chemical, and biological methods, based on effectiveness, efficiency, practicality, ecological impact, and safety.

We further support the District's application of IPM principles for the control of invasive plants on Open Space lands. As a general matter, staff will carefully consider whether the invasive species in question can be eradicated without herbicide, taking into account the scale of the project, the species biology and the negative impact or ineffectiveness of alternative methods. Staff will also consult the Vegetation and Biodiversity Management Plan and the final TPEIR to evaluate the impacts of the proposed practices. Many County staff have years of field experience on top of PhDs or master's degrees in biology or pesticide applicator qualifications.

Nevertheless, we find the analysis of herbicide impacts on non-target native plants to be inadequate. Impact 5.5-3 of the DTPEIR (page 270) assumes that non-target vegetation will be non-native grasses and weeds on the one hand or sensitive or special status species on the other hand. Since sensitive and listed species and plant communities are

to have 100-foot buffer zones, the Report proposes that specific Treatment Plans be drafted to protect such resources during targeted use of herbicide within buffer zones.

These measures are reasonable to protect sensitive species and plant communities from accidental exposure to herbicide although again, we urge the District to require that such Treatment Programs be approved by supervisory level staff or the District board of directors.

But we must also point out that the DTPEIR fails to recognize impacts to un-buffered, common native vegetation that may be exposed to herbicide drift or drip during foliar and rope-wick applications. Appendix E, while it rates the severity of impacts of specific herbicide products and application methods on fish, mammals, birds, humans and insects, also does not discuss such presumably-severe impacts. It is thus essential that the final TPEIR analyze impacts of foliar and rope-wick herbicide application on common native plants and propose appropriate mitigation measures.

Finally, options for reducing impacts on non-target native vegetation should include shielding and tarping in addition to spot-spraying.

- *Fire hazards*

As stated in our August 16, 2013 letter, Marin CNPS supports the VMBP's de-emphasis on primary fuel-breaks in the interiors of preserves in favor of the redirection of available resources to the preserve perimeter and the Wildland-Urban Interface. This will directly protect native vegetation and help reduce the spread of broom and other aggressive non-native invasive plants in these areas where habitat value is higher. As we observed on page 5, "[T]he most effective strategy for reducing catastrophic losses from wildfires is to minimize the management effort spent on the bulk of the chaparral landscape and focus on strategic locations. The worst fires predictably follow landscape features, and these patterns can be used to select buffer zones at the urban-wildland interface for more intensive fuel management."

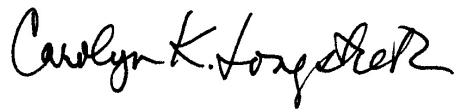
To implement these concepts, the VMBP directs the District to consult with County fire agencies to evaluate all fuel-breaks, existing and planned, for both effectiveness and environmental impact according to a Fuel-break Decision-Making Matrix. Fuel-breaks that are deemed critical for wildfire control and/or firefighter safety will be maintained and those that do not adequately serve the intended purpose will be converted into passages for egress/ingress or removed and restored to native vegetation. Wherever possible, fuel-breaks will be downgraded or eliminated and any

new fire-breaks must be allocated funds for maintenance, erosion control and treatment of invasions. This careful case-by-case examination will ensure that fire safety needs are met while vegetation, natural ecosystems and habitat are protected to the maximum extent.

While Marin CNPS approves of this approach overall, it is concerned that Impact 5.4-1 (Page 221-37) fails to address the impacts on native vegetation that would result if County staff-- under pressure from fire agencies or for some other reason-- failed to implement the VMBP's approach as described above. Such impacts would include further invasions of exotic plants and abandonment of critical restoration efforts.

The DTPEIR's failure to perform such analysis stands in marked contrast to Impact 5.4-2's thorough discussion of impacts that would occur if the District failed to carry out measures for protecting structures and humans from fire danger. (Page 236). The DTPEIR should therefore address uncertainty inherent in the application of the Fuel-break Decision-Making Matrix by identifying the associated risks to native vegetation and appropriate mitigating measures.

Thank you for the opportunity to comment.

A handwritten signature in black ink that reads "Carolyn K. Longstreth". The signature is written in a cursive, flowing style.

Carolyn Longstreth, Conservation Committee, Marin Chapter

California Native Plant Society