

# California Native Plant Society

5 May 2010

Tulare County Resource Management Agency

Government Plaza

5961 South Mooney Boulevard

Visalia, CA 93277

ATTN: David Bryant, Project Planner

RE: General Plan 2030 Update and Environmental Impact Report



Dear Mr. Bryant,

Enclosed are comments from California Native Plant Society on the current General Plan documents. CNPS is a statewide organization, with 33 Chapters from San Diego County to North Coast. Our mission is "to increase understanding and appreciation of California's native plants and their natural habitats through science, education, advocacy, horticulture, and land stewardship". As President of the Alta Peak Chapter of Tulare County, I have taken the lead in reviewing the several documents that comprise the draft updated General Plan. I am a retired professional botanist, with field experience in several parts of the state, and have owned and lived on property in Tulare County for many years.

The policies and goals that carefully include protection and preservation of native plants in natural habitats are indeed inclusive of the issues we might be concerned with, but the permissive language and lack of a comprehensive large scale and long term plan for creating and maintaining large, connected natural areas will make it difficult if not impossible to meet the stated goals regarding natural areas and biological resources.

We hope that County planners, staff, and the several groups of leaders will consider these comments and work to achieve the results envisioned in the policy sections.

Sincerely,

A handwritten signature in cursive script that reads "Joan G. Stewart".

Joan G. Stewart

37759 Hwy 190

Springville, CA 93265

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*Dedicated to the preservation of California native flora*



# California Native Plant Society

## **Comments RE: General Plan 2030 Update and Environmental Report**

I address these comments strictly to portions of the Revised Draft Updated General Plan, (including Recirculated Draft EIR and Background documents) that specifically concern California native plant resources, sites with native vegetation, in natural habitats. These plants are both directly and indirectly affected by projects described, referred to, or by implication, suggested in the DUGP.

Part One, Component C, of the General Plan treats natural resources and impacts to these, and separately, native plants. Page c-1 states as Concept 2 for EMR, that the County “will ensure that... development occurs in a manner that limits impacts to natural resources..... Development will be avoided in naturally... sensitive areas whenever possible.”

Chapter 8, Biological Resources, defines (page 8-3) and comments on sensitive habitat, sensitive natural communities, special status species, and vernal pools. Biological Resources, 8.1, ERM Sections 1 to 9, and 14, as New Policies, clearly imply that protection and preservation of these natural systems, to enhance biodiversity and healthy ecosystems throughout the county, is a goal of the Plan.

In Section 8.8, Work Plan/Implementation, however, the language--”shall require, plan, shall work to develop, shall utilize,,,use zoning, shall incorporate, actively pursue, continue efforts, ensure in oak woodlands, shall establish, shall continue enforcement” although supporting in very general ways the Policies and Goals, leaves ample discretion for setting priorities that will compromise natural vegetation. This is a comment that applies to many sections throughout the document.

However helpful these statements about implementation may be, the Plan, Chapters/ Sections (e.g, Foothill Growth Management Plan), appears to intend to allow extensive development in areas presently “natural”, quite outside existing development. Reference is made to criteria that are to be considered in such projects, but there is clear provision for decisions to be allowed that will adversely affect natural areas.

For example, the use of ‘discourage’, as in FGMP (8.1, 8.7) is likely not to be effective, nor is ‘encourage’, when land use other than to protect/preserve natural vegetation is a favored option. How will FGMP, 8.9 be accomplished in the face of permitted development in natural foothill areas? In FGMP 8-12, who says



what is “unnecessary”?

At this point I want to interject and call attention to accepted ground rules, considerations that are fundamental in planning for “protecting and preserving” natural communities and habitats:

Connectivity and Size. Scattered “postage stamp” preserves accomplish little or nothing over time. Well-managed, appropriately sized areas need to be connected. These are generally agreed-upon basic concepts, and the Plan does not acknowledge or discuss these, nor do the sections about natural resource planning indicate that these have been accepted as primary, underlying principles for such planning. It further is important to remind planners and decision makers that all biological resources essentially depend on, interact with, and are based on plants.

Turning to the RDEIR, Chapter 3:

Fig. 3.11-2, Protected Lands, shows six sites as Preserves that do not at this time have assured permanent protection for biological resources. Five other sites, Refuges and Reserves, are managed for long-term preservation for plants and animals in natural areas. Properties, lands, with easements that actually do “protect and preserve” are not shown.

Chapter 3, Section 3-11, addresses potential impacts of allowed, planned for, not specifically “forbidden”, projects. It also outlines five alternative ways of attempting to meet stated Goals. The Introductory, Regulatory, Environmental setting (essentially included with greater detail as 9.9 in Background Report) are adequate. Seven of nine Sensitive Habitats types in the County are plant dominated, and 3 of 8 Critical Habitat Requirements are based on the need to protect plant taxa. This further emphasizes that native plants are a major component of “biological resources”. As noted above, they support all other life.

Chapter/Section 3.11-31, summary of impacts, makes it clear that there will be substantial adverse effects on Special Status Species. Other sentences mention “encouraging” (that weasel word again) growth outside natural landscapes, working with other groups, agencies, or.... and lists mitigation banking as one way of reducing impacts. This approach seldom and not necessarily will lead to connected Reserves. We can only hope that Tulare County is truly concerned, willing to utilize all possible means of “protection and preservation”, as primary priorities in their role as land planners. Once gone, not recoverable.

Chapter 4 outlines 5 Alternatives, employs the term “feasibility”, states that determination of what this means is up to the Board of Supervisors, leaving it subject to personal opinion, or consideration of short term political, and economic effects. Employing separate easements, suggested as a mitigation measure for

“taking” of natural areas, generally results in “postage stamp” size areas and is an opportunistic rather than carefully thought through method of designating habitat.

Alternative 5 is apparently an attempt to confine growth, is discussed as “environmentally superior”, but this is only relative to comparisons with the other Alternatives. Impacts are evaluated as lying along a continuum of cumulative, significant, or irreversible. In conclusion, the RDEIR “has determined that implementation of the General Plan Update could result in potentially significant impacts to... biological resources.”. And elsewhere,...”nevertheless.... still will result in conversion of some open space and habitat areas... resulting in overall reduction of habitat.”

In the face of these general conclusions, we suggest that it would be useful for planners to consider, adopt and utilize guidelines that make it possible to avoid impacts in the first place.

I recognize and understand the enormous and complicated task that county staff has completed in preparation and distribution of this set of documents. I have worked on similar planning efforts and appreciate the care and time that lies behind completion of this work. Nevertheless, I need to call attention to a plant species that is included as Table 3-11.2. A grass, *Imperata brevifolia* is listed as of concern, yet a currently standard reference for the plants of California notes this as a “Noxious Weed”. Page 3.11-20 lists Sequoia Riverlands Trust as a “habitat”....????

Finally, I, speaking for California Native Plant Society in Tulare County, see nothing that will make the long term protection/preservation goal for native plant diversity actually happen if the present Plan is adopted and used for the next 20 or so years. Enlarging and connecting protected areas, areas that are kept natural, with biodiversity intact, and buffered from surrounding more developed areas, is not at present spelled out in the County Plan as high priority, and therefore it is difficult to anticipate how the County will meet its goal of “protecting and preserving” biological resources if the proposed Updated General Plan is our guide in coming years.

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Comments, General Plan 2030 Update and Environmental Report  
5 May, 2010  
From Joan G. Stewart, PhD, for California Native Plant Society  
37759 Hwy 190, Springville, CA 93265