

California Native Plant Society

East Bay Chapter

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

January 23, 2012

Steve Stewart, Senior Planner
City of Livermore
Planning Division
1052 South Livermore Avenue
Livermore, CA 94550-4899

Dear Mr. Stewart:

The California Native Plant Society, East Bay Chapter (EBCNPS), appreciates the opportunity to comment on the *Mitigated Negative Declaration for the Springtown Wetland Mitigation*. The California Native Plant Society is a statewide non-profit organization that works to protect California's native plant heritage and preserve it for future generations. The Society's mission is to increase the understanding and appreciation of California's native plants and to preserve them in their natural habitat. We promote native plant appreciation, research, education, and conservation through our 5 statewide programs and 33 regional chapters in California. The East Bay Chapter covers Alameda and Contra Costa Counties and represents some 1100 members.

Pursuant to the mission of protecting California's native flora and vegetation, CNPS submits the following comments for the MND:

General Considerations

Wherever possible, avoidance of sensitive species is the best mitigation. In any location that will be subjected to ground disturbance, a complete and well thought out weed management plan is of utmost importance. If a biological survey for weeds has not been carried out at the project site, one will be necessary as part of any successful weed management plan. The results of this survey need to be included in the MND. The weed species found on site should be compared to California Invasive Plant Council's Invasive Plant Inventory. This list will allow planners to categorize on-site weed species by management difficulty as well as potential ecological impacts. Weed management objectives should include measures to protect sensitive native plant communities identified near sites of disturbance.

EBCNPS recommends the use of local ecotypes in any revegetation efforts. Furthermore, performance standards for this revegetation need to be included in the project plan to ensure that any restoration action is successful. Without performance standards for the revegetation portion of this project, the environmental review for this project is incomplete.



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Need for a Noxious Weed and Invasive Plant Control Plan

As mentioned above, a complete survey needs to be completed for weed species at the project site to establish a baseline. Based on the results of this (these) surveys, a list and corresponding map of weed species present at the project site should be included as part of a Noxious Weed and Invasive Plant Control Plan along with a priority list of weeds with a high probability of spreading due to this project. EBCNPS reminds the project planners that “weed species” in this case refers to exotic species of both graminoid and non-graminoid types. This plan should be included as part of the MND so that it may be reviewed and if necessary improved before construction for this project commences. Some highly invasive weeds known to exist in area of project are stinkwort (*Dittrichia graveolens*) and broad-leaved peppergrass (*Lepidium latifolium*). Both of these weeds should be noted in the MND as high risk invasive plants that must be mapped and avoided in order to prevent further spread. This site monitoring for weeds should also be carried out in the years following completion, and the results of these monitoring surveys should be compared to the pre-construction weed maps. If any weed population spread is discovered to be a result of construction activities, they must be controlled as part of the mitigation monitoring requirements.

Any plan that is created needs to place extra priority on vehicle washing to prevent weed seed from spreading throughout the project site on the tires and undercarriages of project vehicles. At a minimum, pressure washing stations outside of the preserve need to be installed to wash vehicles, and strong enforcement measures must be included in the plan for it to be successful. An example is to require a vehicle washing lot that is overseen by a project supervisor, thus ensuring all vehicles are washed before entering the Springtown Preserve. Also, after pre-construction weed surveys are completed, any weed populations that are identified within the project area should be covered with fabric to ensure that vehicle movement to and from the project site over these populations does not result in seed dispersal.

Pre-Construction Survey Timing

Springtown Preserve supports populations of several rare and special status plant species. It is important that pre-construction surveys be executed at the correct time of year to identify these plants.

California Native Plant Society Listed Plants in the area:

Palmate bracted bird's-beak (*Cordylanthus palmatus*) is State and Federally Endangered. It is listed by CNPS as 1B.1. This plant should be surveyed for in July.

Livermore tarplant (*Deinandra bacigalupii*) is a CNPS List 1B plant that is highly endangered. There are only 3 known populations of this plant worldwide, and all exist within the Livermore Valley. This plant should be surveyed for in August.



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Congdon's tarplant (*Centromadia parryi* ssp. *congdonii*) List 1B. This plant should be surveyed for in August.

Brittlescale (*Atriplex depressa*) List 1B. This plant should be surveyed for in July.

San Joaquin spearscale (*Atriplex joaquiniana*) List 1B. This plant should be surveyed for in June.

Hispid bird's-beak (*Cordylanthus mollis* ssp. *hispidus*) List 1B. This plant should be surveyed for in August.

Boraxweed (*Nitrophila occidentalis*) is a locally rare plant that has its only population within Alameda County at Springtown Preserve. This plant should be surveyed for in July.

Importance of Limiting Disturbance to Greater Springtown Preserve

EBCNPS recognizes that the MND calls for enclosing sensitive vernal pool areas with construction fencing to ensure that equipment and workers do not accidentally impact them. We recommend that this measure be expanded to the entire perimeter of the project site. This will ensure that travel by equipment and workers in the Springtown Preserve is limited to the marked entrance road and the project site itself thus minimizing the potential for unforeseen impacts due to careless equipment operation or worker movement.

EBCNPS looks forward to continuing to follow this project and commenting in the future. If you have any questions, please call me at 510-734-0335 or email me at conservation@ebcnps.org

Sincerely,
Mack Casterman
Conservation Analyst
California Native Plant Society, East Bay Chapter

