



# California Native Plant Society

East Bay Chapter  
Conservation Committee

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November 16, 2007

Jason Burke  
Planning and Building Department  
City of Pittsburg  
65 Civic Avenue  
Pittsburg, CA 94565-3814

## **RE: Notice of Preparation of EIR for James Donlon Boulevard Extension Project**

Dear Mr. Burke:

The East Bay Chapter of the California Native Plant Society (EBCNPS) appreciates the opportunity to comment on the *Notice of Preparation of EIR for James Donlon Boulevard Extension Project*. The California Native Plant Society (CNPS) is a non-profit organization of more than 10,000 laypersons, professional and academic botanists organized into 33 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.

We appreciate the challenge of wisely growing the infrastructure of our cities as to make them move livable, safer, and more productive. Traffic is a major concern for many residents of Eastern Contra Costa County, and alleviation of traffic is an important goal for each of the cities in the area. While the creation of an extension is one method for attempting to alleviate traffic, the growth inducing impacts of placing a road in an unincorporated area have been well studied and documented. We want to ensure that such a project will indeed have benefits to an area far exceeding the drawbacks of its cost and environmental impacts.

We ask that a report be produced and include similar "extension" projects in "Bay Area" California, showing the long-term effects of these extensions on traffic. A clear analysis of traffic impacts is required to understand the effect of the extension of James Donlon Boulevard on traffic and environment in the East Contra Costa County Area.

Additional notable omissions in the NOP include the following:

- 1) Impact on fire activity in the area – Many wildland fires begin on roadsides. The maintenance of these roadsides and increased budget for fire prevention is required in perpetuity for this project.
- 2) Impact on weed invasion in this area – Vehicular traffic is one of the most common vectors for invasive species dispersal. There will be a greater chance of weed invasion and dispersal along this new corridor. Weeds have been estimated to have enormous impacts on ranchlands and habitat value, therefore weed abatement must be considered for the sake of our already financially imperiled ranchers. Any impact to local ranchers

needs to be fully considered with complete consideration for long term monitoring and maintenance.

- 3) Soil excavation and global warming – Soil removal and grading activities have profound effects on the global carbon cycle. This project, purporting to require about 100 acres of easement, will have an effect on carbon locally. According to recent CEQA litigation, global warming effects must be considered in an EIR.
- 4) Proper, multi-year plant and vegetation surveys – Please see the attached list that contains the special status plant species known to exist in the Pittsburg area. There is potential for additional special status species to be found on the project site. For this reason, CNPS requests that the DEIR allow for complete surveys for federally and state listed species as well as special-status plants, bryophytes and wildlife that are protected under CEQA. We request that a thorough biological assessment be conducted at the project site by qualified botanists and wildlife biologists to determine if suitable habitat exists for special-status plant, bryophyte, and wildlife species. If suitable habitat exists, in order for a project to comply with CEQA, focused protocol-level special-status species surveys should be conducted at the site prior to issuing a permit. CNPS requests that protocol-level plant surveys be conducted during the appropriate active growing stage of the life cycle of the target species. The surveys require adequate advance planning. Furthermore, we recommend that in addition to addressing federal and state listed species and CNPS List 1A, 1B and 2 species, the following species should also be addressed prior to issuing permits: plants and bryophytes that are CNPS List 1A, 1B, 2, 3 or 4 species, lichens on CDFG’s Special Vascular Plants, Bryophytes, and Lichens List<sup>1</sup>, plants listed in the *Rare, Unusual and Significant Plants of Alameda and Contra Costa Counties*, and plants that are federal species of concern or federally-listed as species of local concern. This request is in accordance with CDFG Habitat Conservation Planning Branch recommendations for “...protection of plants which are regionally significant, such as locally rare species, disjunct populations of more common plants, or plants on the CNPS Lists 3 and 4.”<sup>2</sup>
- 5) Rare plant Communities - CNPS would also like to request that sensitive plant communities that are tracked by CDFG be addressed during the EIR process.
- 6) Modification of riparian habitats and seasonal drainages - A policy of CNPS is to “support all efforts to preserve and conserve wetlands of all types” and “oppose projects that adversely affect wetlands of any type unless there is a demonstrated net gain, in-kind, of wetlands prior to project impacts.” There is significant evidence that more wetland acreage has been lost to development than any other habitat type in California. According to the U.S. Environmental Protection Agency, less than 1% of the wetlands remain in the world.<sup>3</sup> Because the project location seems to cross 7 jurisdictional wetlands, CNPS recommends that stream impacts be considered extensively. We also recommend that, should new wetlands be created as mitigation, they be located in areas that have been degraded, not within other intact functioning ecosystems. Any created or restored

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<sup>1</sup> CDFG. California Department of Fish and Game Natural Diversity Database; Special Vascular Plants, Bryophytes, and Lichens List. July 2004 (periodically updated).

<sup>2</sup> Department of Fish and Game Habitat Conservation Branch.

[http://www.dfg.ca.gov/hcpb/species/t\\_e\\_spp/nat\\_plnt\\_consv.shtml](http://www.dfg.ca.gov/hcpb/species/t_e_spp/nat_plnt_consv.shtml). Accessed on December 9, 2004

<sup>3</sup> Environmental Protection Agency. Wetlands. <http://www.epa.gov/owow/wetlands/>. Accessed on March 20, 2005

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wetlands should be located in appropriate soils and habitats to the south of the extension where there is greater habitat connectivity. Finally, have the US Army Corps of Engineers and California State Water Quality Control Boards been contacted to check to see what permits will be required?

- 7) EBCNPS appreciates the effort to reseed with native plants on road cuts. We hope that locally appropriate plants will be used in this project.
- 8) Soils – Given the formation process of the soils, and the underlying sedimentary rock, EBCNPS has great concerns about the stability of soils and the effects grading will have on erosive processes.

Thank you for your consideration of the above comments. Please do not hesitate to contact me with questions at (510) 734 0335.

Sincerely,



Lech Naumovich  
Conservation Analyst  
California Native Plant Society  
East Bay Chapter  
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## CEQA-Protected Rare and Unusual Plants of the Pittsburg Area

Rank in East Bay	Species	Common Name	Habitat
A1	<i>Allium crispum</i>	crinkled onion	Dry Open Slopes; Serpentine; Misc. habitats
A1	<i>Amsinckia tessellata</i> var. <i>gloriosa</i>	tessellate fiddleneck	Sand or Sandstone; Misc. habitats
*A2	ANDROSACE ELONGATA SSP. ACUTA	California androsace	Dry Open Slopes; Grassland
*A2	ARCTOSTAPHYLOS AURICULATA	Mt. Diablo manzanita	Chaparral; Sand or Sandstone
*A2	ASTER LENTUS	Suisun marsh aster	Misc. Wetlands
A1	<i>Astragalus didymocarpus</i> var. <i>didymocarpus</i> ( <i>A. gambelianus</i> is more common)	two-seeded milkvetch	Grassland
A2	<i>Bidens laevis</i>	bur-marigold	Freshwater Marsh; Misc. Wetlands
*A2	BLEPHARIZONIA PLUMOSA	big tarplant	Grassland; Scrub
*A2	CALOCHORTUS PULCHELLUS	Mt. Diablo fairy-lantern	Chaparral; Serpentine; Woodland
*A2	CALOCHORTUS UMBELLATUS	Oakland star-tulip	Chaparral; Scrub; Woodland
A2	<i>Calystegia sepium</i> ssp. <i>limnophila</i>	hedge bindweed	Misc. Wetlands
A2	<i>Camissonia intermedia</i>	small primrose	Burns; Scrub
A1	<i>Carex globosa</i>	round-fruited sedge	Misc. habitats
A1	<i>Carex multicostata</i>	many-ribbed sedge	Misc. habitats
A1x	<i>Castilleja ambigua</i> ssp. <i>ambigua</i> (historical- 1937)	Johnny-nip	Coastal Bluff; Grassland
*A1	CASTILLEJA RUBICUNDULA SSP. RUBICUNDULA(?)	pink cream sacs	Grassland
A2	<i>Centromadia pungens</i> ssp. <i>maritima</i> ( <i>Hemizonia pungens</i> ssp. <i>maritima</i> in Jepson Manual) (ssp. <i>pungens</i> is more common)	common spikeweed	Salt Marsh
A2	<i>Cicendia quadrangularis</i>	timwort	Grassland
A1	<i>Cicuta maculata</i> var. <i>bolanderi</i>	water hemlock	Brackish Marsh; Salt Marsh
A1	<i>Collinsia bartsiiifolia</i> var. <i>bartsiiifolia</i>	white Chinese houses	Sand or Sandstone
*A2	CORDYLANTHUS MOLLIS SSP. MOLLIS	soft bird's-beak	Brackish Marsh; Salt Marsh
A2	<i>Cornus glabrata</i>	brown dogwood	Riparian
A1	<i>Cucurbita foetidissima</i>	calabazilla	Gravel; Rock, Tallus or Scree; Sand or Sandstone
A2	<i>Deinandra lobbia</i> ( <i>Hemizonia lobbia</i> in Jepson Manual)	three-rayed tarweed	Misc. habitats
A2	<i>Deschampsia cespitosa</i> ssp. <i>holciformis</i>	tufted hairgrass	Misc. Wetlands
A1x	<i>Downingia ornatissima</i> var. <i>eximia</i>	Solano downingia	Vernal Pools; Misc. Wetlands

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<b>Rank in East</b>			
<b>Bay</b>	<b>Species</b>	<b>Common Name</b>	<b>Habitat</b>
A1	Elatine brachysperma	waterwort	Freshwater Marsh; Misc. Wetlands
*A1	ERODIUM MACROPHYLLUM	round-leaved filaree	Grassland; Scrub
A1	Eryngium articulatum	coyote-thistle	Freshwater Marsh; Riparian; Misc. Wetlands
A1	Glaux maritima	sea-milkwort	Alkali areas; Salt Marsh; Misc. Wetlands
A1	Glyceria leptostachya	Davy's mannagrass	Freshwater Marsh; Riparian
A1	Guillenia flavescens	yellow-flowered thelypodium	Serpentine
A2	Helenium bigelovii (H. puberulum is more common)	Bigelow's sneezeweed	Brackish Marsh; Freshwater Marsh
*A2	HELIANTHELLA CASTANEA	Diablo helianthella	Chaparral; Grassland; Woodland
A1	Helianthus gracilentus	slender sunflower	Burns; Dry open Slopes
A2	Hemizonia lobbii (See Deinandra)		
A2	Hemizonia pungens ssp. maritima (See Centromadia)		
A2	Hoita macrostachya	California hemp	Freshwater Marsh; Riparian
*A1	LASTHENIA CONJUGENS	Contra Costa goldfields	Alkali areas; Vernal Pools; Misc. Wetlands
A2	Lasthenia glaberrima	smooth goldfields	Vernal Pools; Misc. Wetlands
*A2	LATHYRUS JEPSONII VAR. JEPSONII	Delta tule pea	Brackish Marsh; Freshwater Marsh
A1x	Layia glandulosa	white layia	Sand or Sandstone
A2	Lepidium dictyotum var. acutidens	sharp-toothed pepper-grass	Alkali areas
A2	Leptochloa fascicularis	bearded sprangletop	Misc. Wetlands
A2	Lessingia glandulifera var. glandulifera	valley lessingia	Forest; Sand or Sandstone
*A2	LILAEOPSIS MASONII	Mason's lilaeopsis	Brackish Marsh; Freshwater Marsh
A1x	Limnanthes douglasii ssp. douglasii (historical-1940)	meadowfoam	Vernal Pools; Misc. Wetlands
A1	Limnanthes douglasii ssp. nivea	meadowfoam	Vernal Pools; Misc. Wetlands
A2	Linanthus dichotomus	evening snow	Gravel; Rock, Tallus or Scree; Sand or Sandstone; Serpentine
A1	Linanthus pygmaeus ssp. continentalis	pigmy linanthus	Misc. habitats
A1x	Linum lewisii var. lewisii (historical-1936)	western blue flax	Dry Open Slopes
A2	Lithophragma bolanderi	Bolander starflower	Misc. habitats
A1	Lupinus affinis	lupine	Misc. habitats
A1x	Lupinus luteolus	butter lupine	Misc. habitats
*A1	MALACOTHAMNUS HALLII (M. fasciculatus in Jepson Manual)	Hall's bush mallow	Chaparral
A1	Malacothrix coulteri	snake's-head	Grassland; Scrub; Sand or Sandstone
*A1	MICROPUS AMPHIBOLUS	Mt. Diablo cottonweed	Dry Open Slopes; Grassland; Rock, Tallus or Scree

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**Rank  
in East**

Bay	Species	Common Name	Habitat
A1	Mimulus tricolor	tricolor monkeyflower	Vernal Pools
A2	Minuartia californica	California sandwort	Chaparral; Dry Open Slopes; Grassland Rock, Tallus or Scree; Sand or Sandstone; Serpentine
*A1	MONARDELLA VILLOSA SSP. GLOBOSA (ssp. villosa is more common)	robust monardella	Chaparral; Woodland
A2	Navarretia atractyloides	holly-leaved navarretia	Rock, Tallus or Scree; Sand or Sandstone areas
*A2	NAVARRETIA COTULIFOLIA	cotula navarretia	Misc. Wetlands
A1	Navarretia viscidula	sticky navarretia	Freshwater Marsh; Grassland; Sand or Sandstone; Vernal Pools
A2	Oenothera deltoides ssp. cognata	desert evening-primrose	Grassland; Sand or Sandstone
*A2	OENOTHERA DELTOIDES SSP. HOWELLII	Antioch Dunes evening-primrose	Sand or Sandstone areas; Scrub
A2	Penstemon centranthifolius	scarlet bugler	Chaparral; Sand or Sandstone; Woodland
A1	Pentachaeta alsinoides	tiny pentachaeta	Grassland
A2	Phacelia tanacetifolia	tansy phacelia	Gravel; Sand or Sandstone
A2	Plagiobothrys infectivus	dye popcornflower	Misc. habitats
A1	Plantago maritima	Pacific seaside plantain	Salt Marsh
A1	Plantago subnuda	Mexican plantain	Coastal Bluff; Misc. Wetlands
A2	Potentilla anserina ssp. pacifica	Pacific silverweed	Misc. Wetlands
A1	Rumex occidentalis	western dock	Misc. Wetlands
A1	Senecio hydrophilus	alkali-marsh butterweed	Misc. Wetlands
A2	Sesuvium verrucosum	sea-purslane	Alkali areas
A2	Sidalcea diploscypha	fringed sidalcea	Grassland; Woodland
A1	Silene antirrhina	snapdragon catchfly	Burns; Sand or Sandstone; Misc. habitats
A2	Spergularia macrotheca var. leucantha	large-flowered sand spurry	Alkali areas; Vernal Pools
A2	Stephanomeria elata	stephanomeria	Dry Open Slopes
A2	Trifolium wormskioldii	cow clover	Misc. Wetlands
A2	Triglochin striata (T. maritima is more common)	three-ribbed arrowgrass	Salt Marsh
*A1x	TROPIDOCARPUM CAPPARIDEUM (historical-1981 but not seen since)	caper-fruited tropidocarpum	Alkali areas; Grassland
A2	Tropidocarpum gracile	slender tropidocarpum	Alkali areas; Grassland
A1x	Vicia hassei (historical-1891)	slender vetch	Grassland; Scrub
A1	Vicia ludoviciana var. ludoviciana	slender vetch	Scrub; Woodland

**NOTE:** Plant species followed by “(?)” have taxonomic or distribution problems and it is not clear if they occur here.

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Dates indicated for historical species refer to last known record in the Alameda-Contra Costa Counties area.

### **Explanation of Ranks**

**\*A1 or \*A2:** Species in Alameda and Contra Costa counties listed as rare, threatened or endangered statewide by federal or state agencies or by the state level of CNPS.

**A1x:** Species previously known from Alameda or Contra Costa Counties, but now believed to have been extirpated, and no longer occurring here.

**A1:** Species currently known from 2 or less regions in Alameda and Contra Costa Counties.

**A2:** Species currently known from 3 to 5 regions in the two counties, or, if more, meeting other important criteria such as small populations, stressed or declining populations, small geographical range, limited or threatened habitat, etc.