

# California Native Plant Society

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Department of Planning and Land Use  
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Re: **SAN DIEGO COUNTY DRAFT GENERAL PLAN VERSION 1.0, 12/30/08**

Dear San Diego County Department of Planning and Land Use;

This letter contains comments on the *San Diego County Draft General Plan*. The California Native Plant Society (CNPS) is a non-profit organization dedicated to conservation of California's native plants and their natural habitats, including conservation of sensitive and threatened plant species, plant communities or habitats, and the problems caused by invasive non-native plants.

We find that the language in the Conservation and Open Space Element would be improved by making the goals more specific, and by improving the linkages between goals in the Biological Resources section, and by creating a method to resolve conflicts between conservation and development goals. We request that the document describe in more detail the County's goals, how to measure progress towards those goals, and how to develop funding for implementation and management.

The opening paragraph in the Element states that the goal of conservation is to "balance the accommodation of future growth and development...". We suggest that the goal of conservation should be to create a sustainable, economically viable ecosystem for the community, one in which proper management of natural resources is a foundation for a healthy community. In order to achieve this, the goals must be specific and measurable and a commitment to measure and change course if necessary must be available. These items are lacking from the plan.

Judging from use of phrases such as "when possible", etc., the document implies that a decision model of some kind is being used. Please be explicit in describing what this decision model is.

Use of words such as "encourage" and "facilitate" weaken the statements containing them. In the absence of a decision model or other explicit rules, these words make it impossible to tell what the statements mean and how the goals rank relative to other goals. Are there any consequences if the County "encourages" an action, but the action does not take



*Dedicated to the preservation of California native flora*

place? If the County is serious about achieving these goals, we recommend that these words be replaced with specific, measurable, achievable, realistic, and timely goals (S.M.A.R.T. goals).

We find that the language in COS-6 (Agricultural Resources) is strong: the desire by the County to preserve these resources is clearly communicated. We request that similar strong language be used for the Biological Resources section.

### **Comments on sections COS-1, COS-2, COS-3:**

In general, these sections do not have goals that are specific or strong enough to achieve the vision stated in the Biological Resources introductory paragraphs. Human development has detrimental effects on the natural environment in many ways: grading, introduction of invasive non-native plants, increased erosion from removal of vegetation and creation of trails, noise and nighttime lights. We find that the general plan fails to deal adequately with most of these.

We recommend that the County create a goal to develop a **technical advisory committee** or similar body, composed of program managers, scientific and policy experts, and conservation groups, in order to develop an achievable plan across jurisdictional boundaries. Such a group is valuable in addressing areas of conflict and in forming a common vocabulary within which to address problems. Such a committee would allow programs to work synergistically to save the County's resources by avoiding duplication of effort. A **model** of such a technical advisory committee is the Los Angeles and San Gabriel Rivers Watershed Council in Los Angeles County (<http://www.lasgrwc.org/>).

COS-1.1: Could a map that shows proposed wildlife corridors and linkages be shown?

COS-1.2: How does the County decide when public infrastructure in preserve areas is "unavoidable"?

COS-1.3: The goal of simply "facilitating the survival" of rare and endangered wildlife is extremely weak and could be accomplished by putting one member of each into a zoo. A better goal is to work towards increasing the protection and population of these **species in order to move them from the rare, threatened, and endangered lists, and to prevent other species from being added to the lists.**

COS-1.3: discuss developing a **funding mechanism** for management of the preserve system.

COS-1.4 and 1-5: Collaboration is essential to achieve a healthy natural ecosystem in San Diego, but it is a means to achieve the goals of conservation, not a goal in itself. We recommend adding this to a goal to create a technical advisory committee.

Page 5-7: The sidebar at the bottom of the page appears to endorse the use of non-native plants to “enhance wildlife habitat areas”. **CNPS does not consider this to be appropriate for habitat conservation.** Non-native plants rarely fulfill equivalent roles to the plants that they displace in an ecosystem. We recommend removing the words “compatible non-native non-invasive plant species”.

**Other goals that we recommend:**

- Identifying priority land for conservation
- Creating buffers between development and natural lands, including wetlands
- Annual monitoring of the health of conservation land and publication of the results on the County website
- Promoting practices, such as hedgerows, that make agricultural lands compatible with habitat development
- Develop a management plan for conservation areas in the County, one leg of which is control of invasive non-native species.

COS-2.1: Why is restoration and enhancement mentioned only in the context of development in Rural and Semi-Rural Lands categories? Restoration and habitat enhancement would be an appropriate goal for all conservation land.

COS-2.2: We recommend that the County adopt a goal to **group housing units** in order to reduce the negative affect of sprawl development on the native environment, and to provide better protection of homes against wildfire. This would be consistent with other goals in the General Plan.

**Invasive non-native species** are mentioned in the Biological Resources section only in the context of wetlands, under COS 3-2. Weeds are a problem throughout the undeveloped lands of the County, and affect wetlands and uplands alike. Additionally, weeds create “flashy fuel” that is easier to ignite than native chaparral. In this case, management of non-native weeds is important to native plants, native habitats (including, but not limited to wetlands), and fire, and it should be managed across these plan elements.

We note that the horticulture industry has been responsible for the introduction and spread of many invasive, non-native species that negatively affect native plants and native habitats. CNPS works with the agricultural community on the state and local levels to promote native and non-invasive alternatives to many of these problematic

invasive plant species, and we advocate that San Diego County do likewise, by promoting the use of locally native and above all, non-invasive plants in all landscaping, drought tolerant or otherwise. Invasive plant control costs billions in the US annually, and preventing the introduction of such species before they become established is the cheapest and most effective means of control. We recommend the addition of a goal that **“the County will prevent the sale and use in landscaping of invasive non-native plants (as defined by the California Invasive Plant Council)”**.

COS-14.11: The State of California has recognized that it is **scientifically unjustified to call out native vegetation as a particular fire hazard**. In 2008, the state codes were modified to reflect this in SB 1595 (An act to amend Sections 51175, 51177, 51178, 51182, 51183, and 51189, of the Government Code, and to amend Sections 4202 and 4291 of the Public Resources Code, relating to public resources), where references to “native vegetation” were replaced by “flammable material”.

**The word “clearing” is not recommended**, as it gives homeowners the impression that all vegetation should be removed, which is not consistent with proper practice, since this will cause other unwanted effects such as increased erosion and decreased storm-water quality.

We recommend that this goal be simply removed, since it is covered by state law, or replaced with **“Require development to adopt fire-safe practices that include modifications to the structure and to all fuel within 100 feet of the home in order to reduce the danger to the structure.”** We would like this document to acknowledge that it is possible for structures to be built and maintained in a fire-safe manner without eliminating natural habitat values.

Thank you for your consideration,

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