

**Friends of Five Creeks recognize and support the urgency of reducing the threat of catastrophic wildfire to the City of El Cerrito. This has been our goal throughout our years of work in the Hillside Natural Area.**

We are disappointed, however, that the draft plan in our view is short-sighted and unrealistic regarding maintenance, and misses the opportunity to develop a broader plan for this 100-acre open space that is both treasure and threat at the city's heart.

**These comments focus on the subjects we know best -- the draft plan's provisions for maintenance, monitoring, and citizen involvement.**

**To be effective over time, this plan should include:**

- 1. Clearer cost information**
- 2. Realistic plans for managing vegetation including invasive plants.**
- 3. Monitoring that is timely and complete enough to allow adaptive management**
- 4. Better recognition and use of what volunteers can provide.**

All-volunteer Friends of Five Creeks has worked hands-on in El Cerrito since our founding 28 years ago. Over those years, we transformed three large, neglected semi-natural areas in the city : Cerrito Creek at El Cerrito Plaza, Cerrito Creek from Adams Street to Pierce Street, and the main, 75-acre portion of the El Cerrito Hillside Natural Area. Our goal has been to create projects that welcome people and wildlife, with reasonably sustainable and diverse vegetation, and a lightened, sustainable maintenance load for the agencies responsible. This appears to have more or less succeeded in the first two.

Unfortunately, the current draft plan appears likely to lead to the Hillside Natural Area's gradually slipping back toward the degraded, tinderbox conditions in which we found it, and/or to let fire-prone pioneer brush and weeds invade both large new fuel and fire breaks and clearings created by removing hazardous eucalyptus and pines.

**1. Clearer Information on Costs** (p. iii. 61-2):

. Lack of meaningful information on costs and funding weaken the value of any "plan." The draft indicates estimated costs only in a summary table (pp. iii-v and elsewhere), using groups of dollar signs. Each added dollar sign multiplies costs by 10. Thus, categories are \$1000-\$10,000, \$10,000 - \$100,000, etc.

**This is of little use for comparing costs, because** it is not clear whether these represent one-time expenses (such as perhaps road and trail improvements) or annual or recurring ones (such as monitoring or invasives removal, which in the long run would make them much higher). No information is provided on actual recent funding or costs, so one cannot tell whether these would be significant new drains on the city's budget.

Another gap regarding cost is that the plan does not specify who would be responsible for the multi-year work of eliminating non-natives, including work deemed “crucial” to re-introducing natives (see item 4, below) .

## **2. Realistic Plans for Vegetation Management**

**A. Cautions from experience with maintenance:** Grants, a main motivation for the proposed plan, provide incentive for large projects such as removing trees or clearing fire and fuel breaks. Grant conditions, however, almost always prevent use of this apparent “free money” for more than short-term maintenance. The history of local agencies’ maintenance following large efforts in natural areas is not reassuring. After the Oakland fire storm of 1991, the large and well-funded East Bay Regional Parks District created fire breaks that soon grew up in broom and other tall, flammable weeds, inviting fire. It remains to be seen whether they and others will maintain the shaded fuel breaks and the like being created now, or whether lack of maintenance will over time make them ineffective.

In El Cerrito, Friends of Five Creeks’ three major projects came about because El Cerrito(1) at El Cerrito Plaza, did not carry out maintenance promised by its permit to restore Cerrito Creek, (b) on lower Cerrito Creek, let vegetation management lapse after a pause during rebuilding of the adjacent sewer line and (3) allowed French broom and other fire-prone invasives, such as Pampas grass and fennel, to take over large swaths of the main, 75-acre El Cerrito Hillside Natural Area.

The draft plan places responsibility for controlling invasives on the small Department of Public Works. It does not mention increased budget or staff, or the reality that even agencies with adequate funds are having difficulty finding competent licensed contractors. Public Works can be proud of some successes, such as suppressing the cape ivy that once blanketed the small stream below King Court. These are balanced by lapses, such as allowing shrubby invasive cotoneaster to take over much of the hillside meadow above Schmidt Lane, or the invasions of tall, fire prone weeds in recent clearings where trees fell or have been removed. Our volunteers are struggling with these – leaving us less time to control broom seedlings resurgent this year due to late rains and a cool spring.

**B. Inappropriate priorities for controlling invasives in actual local conditions:** A plan should make useful recommendations related to actual local conditions.

The draft Action Plan for removing invasive shrubs and herbaceous species (Action 6. Pp. 82-6) begins with an accurate list of high-threat species in the Hillside Natural Area: acacia, cape ivy, cardoon, cotoneaster, Crofton weed, fennel, French broom, Hedera species, thistle, pampas grass, pittosporum, and young mayten, eucalyptus and Monterey pine trees. This list, however, is left hanging.

The draft plan then accurately summarizes many methods of controlling invasives and their drawbacks, with no recommendations on which to use.

After all this, actual recommendations are to prioritize the 15 high- and moderate-invasiveness species found on the California Invasive Plant Council's (rarely updated) list of invasives, localized for the San Pablo Creek watershed (Table F, p. 86).

Although some species are on both lists, this recommendation would lead to ignoring the spread of serious harmful invasives -- cape ivy, several species of tall and quick drying thistle, mayten, pittosporum, and Crofton weed -- while wasting time on small plants that do not cause major harms and are too widespread for meaningful control in large areas --such as English plantain, cats ear, and filaree. This recommendation should be revised to prioritize actual threats to the HNA.

**C. Gap between responsibilities and costs:** The draft plan prioritizes removing invasives in areas with healthy native plant communities (p. 62). It is not clear who is expected to deal with rapid influxes of tall, fast-spreading, quick-drying pioneer weeds such as thistles and poison hemlock. These are nearly universal in new clearings or thinnings. Our volunteers are struggling with them now where large trees have fallen or been removed. The small Public Works staff is not doing this. Without a significant increase in budget or workers, it seems unlikely that it could both remove invasives and protect intact plant communities from them and handle new infestations as more trees are removed or vegetation is thinned to create fuel breaks.

This risky blind spot, with no cost estimates, could have further consequences: Action 7, Restore and Re-Establish Native Species, says at the outset that it is "crucial to first remove and control invasive species before attempting to re-establish native species" (p. 87). A detailed section on oak woodlands, recommending opening the canopy in dense oak woodlands (p. 88) makes clear that this would require years of annual maintenance with hand tools to avoid invasives taking over. This would add to the difficulty and high cost of restoration.

Besides realistically considering costs, it seems advisable to either:

- (a) proceed with clearing slowly, learning about maintenance needs and adapting quickly and often -- much more often than 10 years -- and
- (b) where quick and large-scale clearing is needed to reduce wildfire danger, specifically require frequent monitoring and reassessment of techniques and costs. As detailed below, this is another blind spot in the plan.

### **3. Monitoring Adequate for Adaptive Management:**

The draft's action plan on monitoring (p. 90 ff) sets several monitoring intervals: Yearly or more often for roads and trails (with the help of volunteers), sudden oak death (with the help of volunteers), and fuels in fuel breaks ("managed areas"). The percentage of neighboring properties complying with vegetation rules also is to be reported yearly. Fuels in unmanaged areas (not in fuel breaks) are to be monitored every 10 years, along with Flam Map analysis (a

computer-based analysis of likely fire behavior). No specific intervals are set for monitoring plants and animals.

**Improving monitoring of biodiversity and legally protected species:** Listed species – those that are rare, threatened, of concern, or otherwise legally protected– are to be monitored “regularly.” There is no current baseline against which to compare any findings, making at least initial monitoring useless in determining whether things are getting better or worse.

Monitoring these protected species is useful for their sakes, and perhaps to avoid lawbreaking. The draft, however, presents this monitoring as a measure of biodiversity (p. 91). This is not scientifically valid. Biodiversity is measured in terms of number of species, genetic diversity, or ecosystem diversity, as in the California example [here](#).

**Better reliance on citizen science:** The plan also says that “biodiversity surveys, such as Christmas bird counts, plant lists, and bio-blitzes are encouraged to monitor the biological diversity of the HNA” (pp. 91-2). Such volunteer data, however, needs a clearer path to utilization and influence. The Introduction (p. 9) under “What this Plan Doesn’t Include,” “recognizes the role engaged volunteers can play” in monitoring, but “does not recommend how the City will integrate data, local knowledge, or volunteer work by citizen scientists and others...” because the City does not control these efforts. The City “encourages stakeholder groups to share their knowledge and collaborate with City staff and consultants retained for future assessments and monitoring.”

Citizen-science data can have many flaws and should not be accepted uncritically. However, the current draft’s wording, citizens could waste their time only to see their work ignored. Perhaps involving the city’s commissions could improve this. And use of citizen-gathered data could be even more important for plant mapping and monitoring, discussed next,

**Improving plant mapping and monitoring:** No interval is set for plant mapping or monitoring, even though the draft’s objectives (p. 50 ff) indicate its importance:

- Objective 2.2, p. 58, Remove Invasive Species, recommends “Preventing reinvasion of the targeted weed or invasion of other noxious species by intermittent weed monitoring and mapping. “
- Objective 3.1, Measure Progress towards Vegetation Management Goals, recommends inventory and monitoring programs “within the limits imposed by available funds and resources ... to understand the status of and trends within the natural communities within the HNA.”

This section goes on at unusual length: “Data gathered from these efforts are key inputs into understanding of the past, present, and future of forested and unforested vegetation communities, fire, and a changing climate in El Cerrito. The goal of monitoring is to gather the necessary data to understand what is happening, why it is happening, and how specific management adjustments will change the outcome. Regular, periodic monitoring can reveal new issues that were not addressed in the Plan

(e.g., new invasive species), changed circumstances that need to be addressed, and a potential necessary adaptive shift in vegetation treatments, methods, and locations.”

**Plant growth and spread is highly unpredictable, so setting rigid intervals for monitoring may be impractical. It is safe to say, though, it should not wait 10 years, the interval for plan review.** In less than two years, long-dormant French broom seeds can spring up and set enough seed to restart the long struggle toward eradication. Without baseline data, plants, like animals, can disappear due to “management,” with no evidence that biodiversity has been lost.

Citizen science could fill some of these gaps, particularly because often it is enough to know whether a plant or animal is there, or have rough estimate of numbers. This is a strong reason to provide a clear path to consideration of citizen findings.

#### **4. Neglected opportunities regarding volunteers:**

The draft plan appears to allow assistance from volunteers as labor. It does not encourage the citizen contributions that have been vital to the resurgence and popularity of the Hillside Natural Area. These two, however, go hand in hand.

**A. Resurgence of invasives:** For many years, volunteers have suppressed invasive fire-prone brush and weeds such as Pampas grass, fennel, and cardoon (artichoke thistle) that had overrun the HNA (p. 16). This has brought the city thousands of hours of unpaid work, as well as multiple small grants to hire contractors to do what volunteers could not. Friends of Five Creeks, the largest source of this free labor, is unlikely to continue beyond this year -- our leaders are aging out.

This may have serious consequences. The plan is written as if current conditions are close to static, with encroachment here in there. In reality, volunteers’ work in the HNA requires ongoing work or virtually all the weeds will begin to come back. This year’s late, cool spring brought a resurgence. Despite extra volunteer events, Friends of Five Creeks probably will lose some ground. We are enthusiastically supporting new local leadership, but this can’t yet be counted on, and new leaders will have new priorities.

The draft plan’s proposed Action 6, “Remove Invasive Shrubs and Herbaceous Species” (pp. 82 ff) points out that while volunteers have had considerable success using hand labor, “for agencies relying on hired crews or agency staff labor, maintaining these efforts at the landscape scale and for a sustained duration has proven difficult.” Objective 2.2, Remove Invasive Species, p. 58, also recognizes the roles of volunteers in controlling invasive species.

The draft plan, however, gives little or no weight to these actual physical consequences of volunteer maintenance on whether harmful weeds are contained or spread out of control. The Introduction (p. 9) states:

The City recognizes the role engaged volunteers can play in managing and monitoring the HNA. However, this Plan is limited to actions and responsibilities of the City and its staff, which bear the ultimate responsibility for the management of the HNA.

***B. Loss of positive projects, creativity, and initiative:*** Volunteering is addressed mainly under “public relations” (pp. v, 90, 93), as one of four indicators to be monitored in judging the plan’s success. Objective 3.3: Maintain Community Engagement and Stakeholder Involvement (p. 59) reads in part, “The Plan’s successful implementation partly depends on a functioning community engagement and feedback process that ***allows the community and stakeholders to support the City’s management*** (emphasis supplied.”

Stakeholders and the city’s volunteer committees are to be consulted about the city’s “volunteer engagement approaches,” and will monitor any new “community engagement strategies” that the city develops.

These statements and others both misunderstand and underestimate the contributions of volunteers. As a result, El Cerrito may miss out on vital gains.

El Cerrito’s citizens have a long record of creative and informed public service that has given the city outstanding public institutions such as the Recycling Center, local civic groups such as El Cerrito Trail Trekkers, and local beautification efforts such as the Ohlone Greenway wildflower area and the rescue and restoration of lower Canyon Trails Park, with its frog pond and Native American rock art. This list could go on. Leaders tend to step forward to carry out original ideas, which then marshal broad citizen support and are accepted by the city.

***C. A few ways to encourage citizen initiative and volunteering:*** The draft should encourage these initiatives, explicitly and implicitly. Here are a few suggestions:

The draft plan could take into account that the El Cerrito Urban Forest Committee originated the idea for the current plan and the grant that is paying for it. It should encourage such creative thinking.

In addition to expecting volunteers – presumably Trail Trekkers -- to help with a detailed yearly survey of road and trail conditions, it could acknowledge that Trail Trekkers maps, signs, benches, and an annual festival have greatly increased use and enjoyment of the area. It could encourage such contributions.

Besides assuming that volunteers will help with an annual Sudden Oak Death survey, it could recognize that Friends of Five Creeks brought this effort to El Cerrito, surveyed and mapped all bay trees outside of the HNA, and carried out initial surveys.

Rather than excluding its volunteer committees’ expertise from meaningful input, as was done with this plan, it could cite or adopt city policy encouraging that such ideas be brought to the committees for consultation and recommendations.