



Regional
Parks
Association

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FROM: Amelia Wilson, president, and Joseph H. Engbeck Jr., vice-president, representing the Regional Parks Association

SUBJECT: Comments on the Sibley Volcanic Regional Preserve-Land Use Plan Amendment and recommendations for revision of the proposed amendment.

DATE: January 10, 2005

COMMENTS: After careful review of the documents issued by the East Bay Regional Park District regarding its proposed development of Sibley Volcanic Regional Preserve, and after inspecting the site itself with the proposed development in mind, we hereby submit the following comments and recommendations.

1. The development proposals described in the Land Use Plan amendment would violate both the District's own district-wide Masterplan and the Land Use/Development Plan for Sibley Volcanic Regional Preserve. It would be inappropriate to build and operate a major group camping facility suitable for up to 300 people right in the middle of the preserve.

The board of directors of the EBRPD classified Sibley Volcanic Regional Preserve as a natural preserve on September 26, 1985. That designation is a promise to the people of the region that the District is aware of and will protect "the outstanding natural and cultural features of the parkland" and "hold development within the Preserve Unit to the minimum that is required for public safety and resource protection and enhancement." (Masterplan, page 53/54/55)

The District's guidelines for development of a regional preserve authorize the creation of trailheads and other access facilities within "Staging Units." Such Staging Units, however, are to be limited to areas that are "near or at the edge of the Preserve Unit". (Masterplan p53/54/55)

Given the long-established policies of the EBRPD with regard to regional preserves, it would now constitute a violation of the public trust to allow development of a major facility of any kind in the middle of this or any other regional preserve. The District's Masterplan specifies that a staging unit (or Recreational/Staging Unit as this one is identified) must not take up more than 5% of the park unit's total area. (Masterplan p55) We believe that a campground suitable for up to 300 people plus a parking lot suitable for 60 automobiles

would far exceed the 5% limit. Moreover, we believe that it would be especially egregious to place such a large development right in the middle of a preserve rather than "near or at the edge" of that preserve. Establishing a "Recreational/Staging Unit" in the middle of a regional preserve as proposed in the LUP amendment would set a bad precedent in that it not only threatens the integrity of this preserve, but also undermines the very meaning and intent of the District's regional preserve concept.

The proposed campground also conflicts with the Resource Management Plan for the Caldecott Corridor, a major goal of which states, "Avoid significant changes to the area, recognizing that the Corridor is already a tenuous habitat link and that our understanding of wildlife movements and ecological response to disturbance is incomplete." (page 25)

2. The presence of a large, completely exposed and highly visible campground on prominent high ground right in the middle of the preserve would violate the intent of the Sibley Volcanic Regional Preserve Education Use Area. That Use Area was established by the District in 1985 and described in the park unit's officially approved Land Use Development Plan, which specifies that: "The entire area eastward from (and including Skyline Blvd.) be designed a education/research/study area, except for the staging area and adjacent building(s) and trail head. This designation would apply to any additional areas acquired northward and eastward of the preserve boundary." (LUP p40, 1985)

Designation of the Education Use Area by the District as well as public advocacy and acceptance of that concept in 1985 was clear evidence of a general agreement that the interesting and unique natural features in Sibley Volcanic Regional Preserve should be protected and used primarily for educational and inspirational purposes rather than for other forms of outdoor recreation.

The Land Use Development Plan also specified that a Visitor/Interpretive Center should be constructed at one of two alternative sites within the park. Over the years, however, only a scaled-down version of one of those alternative centers has been built. That visitor center, the Sibley Visitor Center, is very well done both in terms of architectural design and in terms of the quality and effectiveness of its interpretive techniques and intellectual content. Despite that promising start, however, it appears that the District has not continued to think about how to take further advantage of the unique educational and interpretive opportunities offered by Sibley Volcanic Regional Preserve. Lack of that kind of thinking may explain why serious consideration is being given to the development of a 300-person group campsite right in the middle of the park's unique natural resources.

In this LUP amendment plan, the only reference to further development of the park's educational and interpretive potential is made on page 5 where mention is made of a proposal to develop a "self-guiding geologic tour to new points of interest on the former

Stone property." On that same page, without further elaboration, reference is also made to an "educational display interpreting the volcanic geological features of the former Stone property." We are disappointed by this apparent lack of interest in the unique educational and interpretive opportunities at Sibley Volcanic Regional Park.

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We are also disappointed by the plan's heavy preoccupation with livestock grazing as a resource management tool and public safety factor. In fact, grazing is mentioned or discussed in this LUP amendment document no fewer than sixty times, including the unequivocal statement that "Livestock grazing will be the primary vegetation management practice on the preserve." (page 34) The document also explains that grazing will be used to improve site security (page 6), to restore native grasslands (page 15), to minimize brush

(page 15), and to mitigate fire hazard (page 34). The document also claims that grazing will not harm native plant and animal species though it does admit that various measures may be needed to protect certain native species from the adverse impacts of livestock grazing.

While this document claims that commercial livestock grazing will benefit the park in many ways, no reference is made to objective, quantitative, scientific findings that justify these claims. Without substantiating evidence, however, claims that native grassland conditions can be restored by commercial livestock grazing, for example, are simply unwarranted presumptions that do not provide a reliable basis for public discussion and decision-making.

Little consideration is given to the effects of livestock grazing on water quality. The kind of carte blanche grazing management that is proposed makes it is hard to evaluate the potential impact of such grazing on the watershed and on EBMUD's San Pablo and Upper San Leandro reservoirs. The fact that sheep grazing is mentioned without recognizing the enormous fecal matter impact on watershed is of concern, indicating that careful planning has not yet been done, nor specific guidelines set in place for commercial grazers.

Preoccupation with the presumed benefits of commercial livestock grazing should not be allowed to obscure and perhaps replace interest in and development of the opportunity to help the public enjoy and learn from the unique range of natural wonders—from newts to golden eagles and from the ephemeral beauty of springtime wildflowers to the ten or eleven million-year-long story of flowing lava and accumulating volcanic ash—colorful and vivid symptoms of which can be seen and studied in Sibley Volcanic Regional Preserve.

3. As now written, the LUP amendment largely ignores the officially recognized significance of the Caldecott Wildlife Corridor. The Resource Management Plan for the Caldecott Wildlife Corridor is listed as a reference, but its findings are ignored or undervalued by the proposed amendment itself. Once again, the main conflict arises from the proposal to build and operate a large group campground right in the middle of the preserve. Such a facility would conflict with wildlife migration patterns that now exist within Sibley Volcanic Regional Preserve.

RECOMMENDATIONS: We recommend that the board of directors of the East Bay Regional Park District reject the proposed LUP amendment as currently written and refer it back to staff for revision. That revision should be responsive to the comments outlined in this letter and should include the following basic changes:

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1. The group camp suitable for up to 300 people and the related parking lot for 60 automobiles should be eliminated entirely. We believe that it might be possible to justify the development of a much smaller-scale walk-in or backpack camping area that could be tucked into the landscape in such a way as to have little or no adverse impact on the natural resources and educational purposes of the preserve.

2. A road removal program should be implemented for the preserve as a whole. Such a program could eliminate unsightly scars that currently mar the natural landscape and could also eliminate existing runoff and erosion problems that will otherwise be a continuing maintenance problem.

3. Livestock grazing should be sharply reduced or completely eliminated from the preserve in order to allow natural processes to continue healing the preserve's natural landscape. Commercial livestock grazing is inappropriate in an officially designated natural preserve such as Sibley Volcanic Regional Preserve. At most, some limited livestock grazing could be permitted in the preserve in order to achieve specific and limited natural landscape resource restoration goals. The use of livestock grazing for public safety purposes in broad areas not close to the urban/wildland interface is a largely discredited notion. Moreover, it is expensive and has little or no value in terms of improved fire safety. Science-based objective and quantitative information is available on this subject and should be referenced in any future revision of the proposed LUP amendment. The Montanera/Gateway Valley property, which is adjacent to and contiguous with Sibley Volcanic Regional Preserve and which will ultimately become part of Sibley, will have federal and state mandated grazing restrictions designed to enhance native vegetation rather than cater to commercial livestock needs. Any future livestock grazing in Sibley should comply with those restrictions.

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4. A clear policy needs to be stated in the proposed LUP amendment regarding management goals and objectives for the area's ponds and wetlands. It appears that field surveys conducted in 2003-2004 on the wetlands were done merely for the purpose of evaluating forage for livestock grazing. (page A-2, LUP amendment) The amendment indicates that the ponds are to remain unfenced. Even if the District is correct in assuming that California red-legged frogs do equally well in fenced vs. unfenced ponds, the impact of grazing on other factors such as vegetation, water quality, and pond banks, should be addressed in this LUP amendment. We are uncomfortable with the District's statement that "the ponds are to remain unfenced to provide drinking water for livestock..." and only secondarily for wildlife. Grazing during the wet season as mentioned on page 33 of the proposed LUP amendment will almost certainly lead to the degradation of the ponds and the wetland vegetation surrounding them. We believe this issue deserves further study before any decision is made about fencing policy in this preserve.

5. A revised LUP amendment document should include proposals for the thoughtful development and improvement of educational and interpretive programming and facilities in Sibley Volcanic Regional Preserve.

6. Trail connections to adjacent open space lands should be designed and developed in cooperation with the City of Orinda and the Gateway/Montanera developers in order to assure best results.

7. Consideration should be given to banning dogs from the amendment properties. The introduction to the proposed LUP amendment describes an already high level of use by dog walkers in Sibley Volcanic Regional Preserve. The adverse impact on wildlife caused by the presence of dogs in the preserve and in or near the Caldecott Corridor will be exacerbated by increased visitation that will come with increased access to the preserve by automobile and new connecting trails from Montanera/Gateway.

Finally and more generally, the Regional Parks Association believes that the proposed amendment to the Sibley Volcanic Regional Preserve Land Use Plan should be revised so that neither its language nor its implied intent suggests that these lands are to be used primarily for the benefit of livestock grazing. Instead, it should be clear that the amendment will help implement the policy guidelines prescribed for natural preserves as set forth in the East Bay Regional Park District's Masterplan.

