



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 Draft Land Use Plan and Initial Study and Proposed Mitigated Negative Declaration for Sycamore Valley Open Space Regional Preserve as presented for review in January 2005.

DATE: February 16, 2005

COMMENTS: After careful review of the documents issued by the East Bay Regional Park District regarding its proposed Sycamore Valley Open Space Regional Preserve, and after inspecting the site itself with the draft land use plan in mind, we hereby submit the following comments and recommendations.

1. The Draft Land Use Plan for Sycamore Valley Open Space Regional Preserve states that it is intended to provide a "guide for preserving 700 acres of Sycamore Valley's farming past and providing trail recreation at this open space." (See page one) Four goals are identified for the Preserve: maintaining the open grasslands as "working rangeland" while providing public access by means of walking trails, minimizing wildfire risk, and conserving "remnant native wildlife."

No attention is given to the quality of experience that should be made available to park visitors nor is very much attention paid to the intrinsic value of Sycamore Valley lands for recreation, education, and inspiration. These matters are treated as afterthoughts. The main objective, repeatedly asserted, is commercial livestock grazing. That fact is implicit throughout the document and is forthrightly and explicitly stated on page D8.

This approach to land use planning is not appropriate to a regional preserve, which according to the East Bay Regional Park District Master Plan is as an area whose "outstanding natural or cultural features are to be protected for their intrinsic value as well as for the enjoyment and education of the public." (EBRPD Master Plan p40-43)

The draft land use plan for Sycamore Valley Regional Preserve does not describe any meaningful steps to preserve Sycamore Valley's pioneer ranching tradition. As now written, the land use plan indicates that one interpretive panel (perhaps more than one) will describe the life and times of

various pioneer families. But there are no proposals to preserve pioneer customs, traditions, or technology. Instead, the land use plan simply proposes to allow modern, commercial cattle grazing to continue on this public land. It should be noted, however, that commercial cattle grazing does not really need to be preserved in this regional park. Such activity is already alive and well as a vigorous, ongoing industry in Alameda and Contra Costa counties. In fact, according to statistics compiled by the U. S. Department of Agriculture, there are today about 25,000 cattle grazing on some 279,000 acres in Contra Costa County alone—part of a statewide inventory of more than 5.2 million cattle grazing more than 65 million acres of land in California. And, as the California Cattlemen's Association proudly points out, nearly 13,000 ranchers and beef producers contributed over \$1.58 billion to the state's \$25 billion dollar agricultural economy in 2002, making beef the 5th leading agricultural commodity in the state.

On the other hand, what is rare and special about the Sycamore Valley Open Space Regional Preserve is the fact that it has been saved as publicly owned open space so that its intrinsic values are now available for restoration and preservation as called for in the District's Master Plan. The East Bay Regional Park District and the Town of Danville should both be very proud of their roles in preserving this open space land. Both agencies should now be asking for a land use plan that makes the most of the unique opportunity that has been provided to enrich the lives of the District's human population.

2. The land use plan describes Sycamore Valley Regional Preserve as "generally steep and erosion-prone" (see page 2), but fails to point out that most of the erosion that has occurred in the area during the last 150 years has been the result of heavy livestock grazing.

The plan also points out (see page 6) that there is a need to "control the introduction and spread of yellow starthistle, artichoke thistle, and other weeds (see page 6), but fails to point out that these plant species were introduced into California and then spread largely by livestock grazing and other environmental disturbances caused by various human activities.

The plan proposes to control these intrusive non-native plants by livestock grazing, but fails to point out that all of them are adapted to survive livestock grazing. The history of California's grasslands and their degradation as a result of the 18th century introduction of large grazing herbivores from the Mediterranean Region has been extensively described. The lessons learned over the years about this subject should not be forgotten or ignored.

3. Two paragraphs in this land use plan (see page 7) are devoted to a description of Native American life in the vicinity of Sycamore Valley, but is not clear that any interpretive exhibits or programming will be devoted to telling the story of early human occupation and use of the area. Since the Bay Miwok-speaking people known as the Tatcan lived in this area for thousands of years and were intimately familiar with all of its plant and animal life, their story offers a wonderful opportunity to help present-day residents understand and appreciate this area's unique natural resources.

4. The story of Charlotte Wood (see page 11) also offers a wonderful opportunity to interpret the pioneer tradition from the point of view of a perceptive and thoughtful local resident. Her poem, "Our Valley in the 1850s" refers lovingly to Sycamore Valley's winding tree-covered creek, gnarled oaks, golden poppies, wild paint-brush, brodiaea, and baby-blue eyes as part of "nature's garden." One cannot help but wonder what she would think of the heavy-handed land management proposals presented in the District's draft land use plan.

5. All of the trails proposed for public access (see page 26) are to be graded to ten feet in width and maintained at eight feet. It should be noted that walkers, hikers, and other pedestrians do not need trails that wide. Even horseback riders and trail bike users do not need trails that wide. Only vehicles need such trails. And it is not clear that vehicles—presumably fire fighting equipment—need to use all of the trails. The construction of narrow trails—suitable for pedestrians—would do less environmental damage, would be easier to keep free of weeds, and would provide a more intimate experience for trail users.

6. The Vegetation Management proposals presented on pages 28 and 29 are inherently self-contradictory. Livestock grazing is presented as the answer to weed infestation although such grazing is the main reason why weeds—that is, non-native intrusive plant species—are now established in the preserve. Moreover, commercial livestock grazing is proposed as the primary means of achieving "land restoration goals," though it is unclear exactly what those goals might be. Commercial livestock grazing is even proposed (see page 29) as a means of restoring the ponds that now exist on the property—ponds that are known to contain California red-legged frogs. No mention is made of the fact that the District was sued for allowing commercial cattle grazing to destroy red-legged frog populations in the preserve and that a court order forced the District to install fencing to exclude cattle from the preserve's riparian habitat.

7. On page D7 it is claimed that the "foraging and trampling activity of domestic livestock is comparable to that of the vast herds of native wild herbivores, which once roamed the [Sycamore Valley] area in considerable numbers." This is a thoroughly misleading statement. The "native wild herbivores" that once lived in the vicinity of Sycamore Valley—mainly deer and elk—were creatures of the open range that never remained very long in any one area. Wolves and mountain lions and other predators kept them on the move. Domestic cattle, on the other hand, prefer grass and tend to congregate and settle down in one area until the scarcity of available browse forces them to move on. Moreover, deer and elk weigh only a fraction of what a modern domestic cow weighs. Their "foraging and trampling" activities therefore have an entirely different impact on soil and plant life.

Native bunch grasses such as purple needlegrass should be re-introduced to the area and encouraged to replace the annual grasses that now dominate the area. This would eliminate much of the need to manage the relatively tall, fire-dangerous, non-native, annual grasses that are so easy to ignite throughout much of the long, hot, summer and fall seasons.

8. The number one management objective in this draft land use plan (see page D8) is "to use grazing, burning, mechanical, biological, and chemical treatments as resource management tools." But grazing etc. should not be considered an end in itself. Grazing etc. should be looked upon as simply a means to other objectives.

9. The second major objective identified in the draft land use plan (see page D8 and D9) is to "manage the land to minimize the potential for uncontrolled wildfires." This objective is unquestionably a major concern at Sycamore Valley Regional Preserve since the whole area is now largely covered by annual grasses and other dry flashy fuels that are extremely easy to ignite into flame throughout several months of each year. These dry flashy fuels are present in the Preserve largely as a result of commercial cattle grazing and related human activities that have eliminated perennial grasses and other native vegetation. Such native vegetation characteristically remains moist and green throughout most of the year is therefore far less likely to burn. The Management

Prescription described on page D9 calls for continued commercial cattle grazing, but this policy will simply perpetuate the existing fire-prone conditions. Cutting edge scientific research on this issue is now available. It should be consulted both for an improved understanding of the problem and for suggestions about how the problem can be addressed in the most effective and economical ways.

10. Management Objectives 3 through 6 deal with the need to control non-native herbaceous vegetation while restoring native vegetation and protecting native wildlife. These are laudable objectives, but the management prescriptions for each of these objectives are based primarily on commercial cattle grazing as the answer to almost all problems. This is unfortunate.

Some grazing by cattle or sheep may be appropriate and beneficial, but it is not clear that the District's future grazing program will be sufficiently different from the District's current grazing program to have a beneficial effect. The proposed difference needs to be clearly specified.

RECOMMENDATIONS: We recommend that the board of directors of the East Bay Regional Park District reject the proposed draft land use plan and refer it back to staff for revision. This procedure is especially prudent and appropriate at this time because both a new Wildlands Program Manager and a new Wildlands Vegetation Program Manager are about to be hired. Input from these two new professionals might well provide the up-to-date scientific knowledge that is sorely lacking in the current version of the proposed Sycamore Valley Regional Preserve Draft Land Use Plan. That revision should be responsive to the comments outlined in this letter and should include the following basic changes:

1. Livestock grazing should be sharply reduced in duration and otherwise modified to allow natural processes to heal the preserve's natural landscape. Commercial livestock grazing as now practiced in Sycamore Valley Regional Preserve is inappropriate in this or any other officially designated natural preserve. Livestock grazing should be permitted in the preserve only 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. It is expensive and has relatively little 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 land use plan. Future livestock grazing in Sycamore Valley Regional Preserve should be designed to enhance native vegetation rather than continuing to cater to the needs and desires of the commercial livestock industry.

2. A more detailed, more creative, and more imaginative educational and interpretive plan should be developed for Sycamore Valley Regional Preserve. Such a plan could be developed with a small fraction of the time, effort, and attention that has been devoted to the justification and promotion of commercial cattle grazing in the preserve in the present land use plan. Interpretive panels and other means could be used to help the public understand and appreciate the human history of Sycamore Valley and could also help people understand and appreciate the area's natural history including the ongoing process of natural landscape restoration that is needed in the preserve. Such educational and interpretive panels and programs would greatly enhance the value of the preserve to the people of the region and could be effective even if implemented very economically.

3. If a negative declaration is filed for this land use plan, we recommend that greater attention be given to the possibility of avoiding various problems or potential problems. In fact, we believe that

avoidance should be the preferred alternative in situations where potentially negative impacts are evident. For example, alignment of the Slope Trail might be laid out to avoid the riparian area. Or it might be possible to avoid the use of heavy machinery ("requiring mats") to preserve the pond alongside the Tatcan Trail. Or it might be possible to avoid cattle grazing during the wet season as part of a plan to restore native grasses.

Conclusion:

The East Bay Regional Park District and the people of the region would do well to honor the wisdom and vision of the pioneer resident and long-time school teacher, Charlotte Wood, whose poem about Sycamore Valley is quoted on page 11 of the draft land use plan. She clearly knew how to appreciate the region's natural beauty and recognized that the pioneers who settled here had discovered "Nature's garden, unmarred."

What spot more enchanting,
 More inviting, more fine,
 Than this beautiful valley
 Rich in verdure and vine?
 Wild oats waving gently
 In the soft western breeze,
 The brook's winding course outlined
 by its myriad trees.
 Gnarled oaks' spreading branches
 offering generous shade,
 The vine-covered creek banks
 like deep everglades,
 While anon in the distance,
 hid in snug leafy bower,
 Peal the sweet warbling notes
 of the twilight hour.
 The hill-slopes near by
 with golden poppies aglow,
 Wild paint-brush, brodia,
 Baby-blue-eyes, and so,
 To this primeval valley,
 Mt Diablo its guard,
 Came these pioneer people
 to Nature's garden, unmarred.