

**From:** Denise Louie  
**To:** [info@PlanBayArea.org](mailto:info@PlanBayArea.org)  
**Subject:** Plan Bay Area 2040 Comments  
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Dear Plan Bay Area 2040 Ladies and Gentlemen:

Plan Bay Area 2040 (the Plan) focuses on accommodating continued growth, leaving the environment as a challenge to overcome. In my view, this is unacceptable. Protecting our environment should be the focus.

California was an extraordinary gift of nature. However, since the 1800s, in just 200 years, our population numbers, our activities for daily life and economic gain and now climate disruption have destroyed over 95% of our native redwood forests, 95% of our native grasslands, and so on. California is one of 36 internationally recognized biodiversity hotspots. We are blessed with an abundance of native plant species and wildlife that co-evolved with them; yet, many species are at risk of extinction due to human activities.

The most obvious thing you can do is to stand up and say we must manage our population numbers and many of our activities. I hear our State needs 1.8 million more housing units by 2025. You can explain to decision makers that we have already exceeded earth's carrying capacity in California; we are degrading our environment with our population numbers and our lifestyles. Overpopulation is the underlying cause of many of the big issues in our State. I urge you as individuals and as a group to support the State Water Board's water plan and urge them to promise us 60% unimpaired flow from the Tuolumne River to the Bay. Because scientists have warned us that anything less than 60% risks species extinctions and ecosystem collapse along and around these waterways. For example, in a recent report from California Trout and UC Davis\*, it is clear that salmon and trout species are in trouble; they need clean, cool water to survive as species. The report cites population growth and global warming as two of the major factors threatening our fish. The SF Bay and Delta is a Wetland of International Significance; this fact is worth a thousand words.

The next most obvious thing you can do is to stop urban sprawl right away. If you have visited the Diablo range, for example, you might know that undeveloped areas are havens for native plant communities. Grasslands are my favorite, because this is the habitat where wildflowers grow.

The List of California Terrestrial Communities and CNDDDB are mentioned at the top of the Plan, p. 2.9-22. It would be most informative to include a map of these Special Status natural communities in the Plan.

The California Native Plant Society (CNPS) has identified over 6300 species of plants native to California, and over 1/3, or over 2100, species occur in the wild nowhere else. In San Francisco County alone, CNPS has identified 402 CEQA taxa.\*\* Of the CEQA taxa, 188, or 47%, are already extirpated; this means 214 taxa should all be included in the Plan. In the East Bay, 816, or 63%, of the 1303 native taxa are considered CEQA-worthy. While watch lists for the two areas include 111 taxa that are not "significant" pursuant to CEQA, these taxa are, indeed, worthy of special attention and Special Status.\*\*\* These are

examples of the kinds of species the Plan should incorporate, particularly in view of the fact that plant species are facing increasingly difficult challenges.

At ebcnps.org, I gained access to the East Bay Chapter's database of rare, unusual and significant East Bay native plant species. I counted 61 plant species (6% of the 1014 total) that can no longer be found and are now presumed extirpated. Colleagues and I have watched species go extinct due to human activities.

According to a CNPS conservationist, native plants worthy of Special Status include:

1. All FESA / CESA listed plants
2. All CRPR 1B and 2 plants
3. All CRPR 4 plants that show local or regional significance
4. All rare plant alliances identified by CDFW's Vegetation Maps

Additions should be made to the few Special Status species mentioned in the Plan to include all of the above 1-4. In my own opinion, the Plan should require each county to work with local groups when it comes to identifying and protecting Special Status plant species and Special Status natural plant communities, especially for land development.

The Plan should include all species listed at USFWS's Information for Planning and Consultation; see <https://ecos.fws.gov/ipac/>. For example, Marin's endangered Short-tailed Albatross and Myrtle's Silverspot Butterfly are omitted from but belong in the Plan. USFWS also has lists of threatened species and critical habitats; please ensure these are included in the Plan; e.g., add Marin's threatened Yellow-billed Cuckoo and Southern Sea Otter. These examples demonstrate the need for the Plan to address complete USFWS information on all 9 Bay Areas counties.

Regarding urban sprawl and water use, on my first, recent visit to the Diablo range beyond Mt. Diablo, I was appalled by the lush green lawns of Clayton. The Plan should encourage such enclaves to outlaw lawns or publicly highlight the profligate use of water and toxic synthetic chemicals. These properties have already supplanted precious habitat of native, wild, sensitive species.

Regarding use of pesticides, San Francisco's Department of the Environment has eliminated the most toxic pesticides from its list of acceptable chemicals. And our Recreation and Park Department has reduced its use of pesticides to a minimal amount. Meanwhile, ordinary citizens can buy and use any commercially available pesticide. A few weeks ago, a longtime biologist from SF State University told an audience that compared to historical records, the City is missing 4 or 5 (I can't remember which) native bumblebee species. Whatever harm pesticides are perpetrating on honey bees, they are also perpetrating on our native pollinators. The Plan should encourage local governments to ban, minimize or control the sale, purchase, use and or collection of pesticides, including at a minimum neonicotinoids and chlorpyrifos.

As a member of CNPS, I urge you to consider habitat restoration as a top priority. CNPS, with its 35 chapters, and other community groups have volunteers doing habitat restoration in conjunction with private or public landowners. And habitat restoration really does work. Visit sites in the Presidio of San Francisco to see the return of wildlife at restored sites. In our Sunset District, Nature in the City succeeded in connecting previously isolated communities of the Green Hairstreak Butterfly by enlisting neighbors, public agencies,

schoolchildren and volunteers to plant native nectar and host plants for the rare and endangered butterfly. The Plan should encourage the entire Bay Area to be invested in habitat restoration.

Hong Kong is one of my favorite models. Millions of people live on a very small footprint. The government has built transportation infrastructure to get people where they need to go in an efficient manner. Beyond the high rises are green, open spaces. We would do well to consider saving our open spaces for local native plants. In the Bay Area, we are lucky to have green spaces as well as CNPS chapters with expertise and local native plants for sale. The Plan should connect government agencies, schools, developers and citizens with the Yerba Buena Chapter (SF), the Marin Chapter, the Willis Linn Jepson Chapter (Solano County), the Milo Baker Chapter (Sonoma County), the East Bay Chapter and the Santa Clara Valley Chapter. Government agencies should be propagating and planting local native plants, as does the SF Recreation and Park Department. Schools should be training future gardeners and landscapers to use local native plants and to avoid invasive plants; for example, the City College of SF (CCSF) Sustainability Plan says we shall remove and avoid invasive plants, and we shall plant native plants. On the other hand, a landscaper planted invasive non-native plants in my San Francisco neighbor's garden two years ago, because that's what he had been taught decades ago. Government agencies and schools would do well to adopt policies like CCSF's; the Plan should encourage them.

The Plan should encourage individuals and private and public entities to use plants that are native to their location, especially for locations near open spaces. For example, the Golden Gate National Parks Conservancy returns propagated plants to the same side of the same hill in the Golden Gate National Recreation Area. When Cal Trans introduced a certain native plant from Southern California to the central coast some years ago, a local native plant was outcompeted and extirpated. Volunteers were able to remove the non-local plant and to reintroduce the local native. Also, Monterey pine and cypress are native to Monterey, but are considered invasive in San Francisco. Moreover, local natives have a local pedigree or heritage. Introducing non-local plants that can cross-pollinate with local plants will muddy unique local gene pools that evolved over millennia. CNPS chapters propagate and sell local native plants. Big-box and hardware stores and commercial nurseries sell "native plants" whose pedigree is almost certainly not local.

Saving open spaces includes saving faraway desert habitat from solar installations. The Plan should encourage communities to require or subsidize rooftop solar.

Education should be part of the Plan. Include schools, posters at BART stations, exhibits at each terminal of our airports, and tabling at community events. Teach residents and visitors that California is a biodiversity hotspot and that each individual can mitigate negative impacts and improve positive impacts of his or her life. Because ALL SPECIES LIVES MATTER.

Now I'll change hats. I don't want to dilute my environmental message. But I'm a taxpayer and resident, too. In Environmental Geology class, I learned that population growth includes more people living in hazardous areas. It just seems ridiculous that even though we know this, more and more people have come to live on or near major earthquake fault lines and along our coast and shorelines. San Francisco has retrofitted public and private masonry and public soft-story buildings. Private soft-story buildings are currently being

retrofitted. If this is not happening in other Bay Area counties, it should be part of the Plan. I urge you to stop further population growth and construction on or near major earthquake fault lines. Where possible, return the land to farming or grassland.

Regarding sea level rise, it seems ridiculous to me that we build according to predictions of sea level rise out to 2040 or the end of the century. I seriously doubt sea level will stop rising at 2040 or 2100. The Plan should prohibit building more structures that may likely become flood problems for future generations or for the environment. In short, I urge you to stop further population growth and construction in areas subject to flooding due to high sea level rise.

Thank you for your outreach. I hope you'll take my comments to heart. Eyes around the world are watching what we do here. Even Pope Francis reminds us to take care of our environment. And Saint Francis, for whom the City and Bay Area are named, is our patron saint of the environment.

Sincerely,  
Denise Louie  
native San Franciscan  
member, California Native Plant Society  
member, City College of San Francisco Sustainability Committee

\* <http://caltrout.org/sos/download-sos-ii/>

\*\* Follow links via <http://www.cnps-yerbabuena.org/experience/index.html>  
Or take a short cut to <https://www.wood-biological.com/san-francisco-plant-checklist/locally-significant-plants-of-sf/>

\*\*\* For more information, contact Mike Wood