

Appendix C Examples of Failure to Address Grazing Impacts in LUPs

To illustrate the meaningless coverage of cattle grazing impacts in the LUPs, here are statistics and excerpts on cattle-grazing from all LUPs written to date. The acreage values shown are those extracted from the Planning Status sheet that contains LUP status for all *Parks under Grazing Management*. These values do not always agree with Range Analyses received by the author from the EBRPD. Differences are noted with comments. If there are references to cattle grazing in the document, such references have been extracted and reproduced here. The same is true for cattle grazing references in the EIR.

Ardenwood Regional Preserve

Document Title: Final Land Use – Development Plan / Environmental Impact Report

Date Completed/EIR Certification: 3/16/82

Updates: None

Acres Grazed: 100

Range Analysis Completion Date: None

Cattle Grazing References: None

Cattle Grazing Impacts Addressed in EIR: No

The EIR consisted of 22 pages with no references to cattle.

Bishop Ranch

Document Title: **No LUP/EIR Completed**

Date Completed/EIR Certification: Not Applicable (NA)

Updates: NA

Acres Grazed: 350

Range Analysis Completion Date: 12/29/93

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

Black Diamond Mines Regional Preserve – Original LUP/EIR

Document Title: Land Use – Development Plan / Environmental Impact Report

Date Adopted: 8/26/77

Resolution No: 1977-08-250

EIR Certification: None Identified

Updates: None

Acres Grazed: 4,277

Cattle Grazing References: Yes

The authors of this LUP had a more unbiased sense of the impacts of cattle grazing even though it was not included in the EIR section of the LUP. Even though they proposed retaining cattle grazing in the park, the authors were aware of the negative impacts of such a decision. The following is an excerpt from the only paragraph in the document that discussed grazing (*Natural Resources Management Plan*):

“Large native grazing animals (tule elk, pronghorn) have been replaced in historic times by cattle. Old photographs show a somewhat more brushy

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condition in certain areas of the parkland than occurs at present. Since the District has managed the rangeland, stocking levels have been reduced. Thus, the shrubs, which appear to be lupines and sagebrush, can be expected to increase. It is therefore proposed to retain cattle grazing at its present level. This is below range capacity, which reduces competition between livestock and wildlife for grassland resources and will encourage some shrub regeneration. Fencing realignments will be made to create more appropriate grazing units, reduce total fencing needs and exclude cattle from springs, Markley Creek and areas of high use. The effect of this will improve water quality and enhance visual quality and wildlife habitat.”

This voice is certainly not one of the current generation of board members or upper management. There is an acknowledgement of wildlife/livestock competition for grassland resources and shrub generation is expressed as a positive management objective. They also make the point that excluding cattle will improve water quality, enhance visual quality of the park and enhance wildlife habitat. Such commentary and truthful acknowledgements are non-existent by the current board and upper management at the EBRPD.

Cattle Grazing Impacts Addressed in EIR: No

The EIR was 6 pages with no references to cattle grazing impacts.

***Black Diamond Mines Regional Preserve – Garaventa Property
Amendment***

Document Title: Land Use Plan Amendment – Garaventa Property

Date Adopted: 8/15/00

Resolution No: 2000-8-185

EIR Certification: None Identified

Updates: None

Acres Grazed: 786

Range Analysis Completion Date: 1/20/00

Cattle Grazing References: Yes

This document, which includes a Grazing Unit Management Plan (GUMP), was prepared during the GRTF review and therefore represents what the EBRPD can do when placed under the magnifying glass. It could be considered another “whitewashing” of sorts given that this document is like no other LUP the District has ever produced in its history given the level of detail related to cattle grazing.

The GUMP document was of the same caliber as the Master Plan 1997 in the sense that it states what should be done. This document appears to have had considerable time and research expended to create a document with very specific objectives. However, according to the GUMP, the information presented was allegedly “based on ecological principle and the application of knowledge, skills, and techniques determined through scientific research and experience”. Such a statement has in no way been validated by the District’s GRTF Review or staff presentations or documentation. It can best be described as conjecture based upon anecdotal data.

The author does give the District an “A” for effort for the information provided but disagrees with the general management philosophies represented with regard to cattle grazing.

Cattle Grazing Impacts Addressed in EIR: No EIR in document

Black Diamond Mines Regional Preserve – Clayton Ranch

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA (Not Available)

Updates: NA (Not Available)

Acres Grazed: 1,031

Range Analysis Completion Date: Unknown

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

Briones Regional Park – Original LUP/EIR

Document Title: Land Use – Development Plan / Environmental Impact Report

Date Adopted: 9/22/81

Resolution No: 1981-9-263

EIR Certification: None Identified

Updates: None

Acres Grazed: 3,275

Range Analysis Completion Date: 9 analyses dating from 11/13/88 to 10/12/93

Cattle Grazing References: Yes

Cattle Grazing Impacts Addressed in EIR: Yes

The EIR was 41 pages with minimal references to cattle grazing impacts as listed below. This EIR was the most comprehensive of all EIRs reviewed. While the EIR recognizes the impact of cattle on water quality, it generally views the park as a range resource with excellent grazing potential. The EIR does recognize that continued livestock grazing may reduce browse for other animals but in no way indicates that this is an impact to wildlife. There were no mitigations identified relating to cattle grazing.

Water Quality – Grazing of livestock and equestrian Park use have recognized effects on the nutrient loading of streams from manure and stream sediment/turbidity from livestock drinking and wading in creeks. This is a recognized impact of livestock grazing in the park.

Range – The Park is a significant agricultural resource, having rangeland with about 3000 animal unit months (AUM) (enough vegetation to feed a mature bull or cow one month) of grazing potential. The range resource grazing potential is located in grassland, open shrub, and savannah areas of the Park. Grazing by cattle is currently limited to approximately 2,500 AUM.

Wildfire – Grazing is the major method of vegetation management used by the District at Briones to reduce fire fuel.

Grazing - Loss of 30 acres and about 300 AUM (10% of Park's total potential) of primarily oak/bay woodland range would occur by fencing out

(excluding) cattle in order to protect the proposed Regional Archery Center in Bullseye Valley. The continued grazing of livestock in the natural areas of the Park provides a valuable agricultural opportunity, even though it may reduce browse for other animals. The Plan may result in additional water development in two areas of the Park; if provided, both grazing and wildlife habitat may be improved. Proposed introduction of tule elk would have significant impacts on the vegetation, deer herd, and grazing potential in the Park and on neighboring land.

Briones Regional Park – Southwest

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA

Updates: NA

Acres Grazed: 438

Range Analysis Completion Date: Unknown

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

Briones Regional Park – LUP Amendment (East; Brown)

This document was not included in the public records request for all LUPs completed by the District. Planning Status sheet indicates amendment was completed in 1994.

Document Title: Unknown

Date Completed/EIR Certification: Unknown

Updates: Unknown

Acres Grazed: 720

Range Analysis Completion Date: Unknown

Cattle Grazing References: Unknown

Cattle Grazing Impacts Addressed in EIR: Unknown

Briones Regional Park – LUP Amendment (Buckeye Ranch)

This document was not included in Status Planning sheet list.

Document Title: Land Use Plan Amendment

Date Completed: 2/16/99

Updates: NA

Acres Grazed: 128

Range Analysis Completion Date: Unknown

Cattle Grazing References: Yes

***Wildland Vegetation Management** - The majority of Briones Regional Park is currently being grazed by cattle as a resource management practice to reduce the threat of wildfire, maintain plant and animal diversity, minimize brush encroachment, and preserve the open space character of the landscape.*

Continued grazing would be the most practical and cost-effective method for achieving vegetation management objectives in these grassland areas, with areas of steep terrain.

Cattle Grazing Impacts Addressed in EIR: No EIR in document.

Carquinez Strait Regional Shoreline

Document Title: Land Use – Development Plan / Environmental Impact Report

Date Adopted: 11/16/93

Resolution No: 1993-11-304

EIR Certification: None Identified

Updates: None

Acres Grazed: 2,205

Range Analysis Completion Date: 8 analyses starting 12/28/93 to 10/13/94

Cattle Grazing References: Yes

There was an EIR listed in the table of contents but there was no EIR in the bound document that the author received from the District.

Natural Resources Management – Use of rotational grazing and prescribed burning for fire hazard management and plant diversity.

Vegetation Management – Management will include the use of grazing, mechanical treatment, prescribed burning, integrated pest management, habitat protection and habitat restoration.

Coyote brush and poison oak will colonize open grasslands in the absence of active management, such as grazing, burning or mowing...Continued livestock grazing has been effective in minimizing the incursion of these shrub species into grasslands of the East Bay.

Protection will be provided to riparian and other wetland areas, especially in locations where grazing occurs in the park. Where natural water sources are developed for grazing use, water storage facilities will be located on dry ground outside the exclosures. Spring-fed ponds will be protected once alternate drinking water for grazing animals has been provided outside of or near the enclosed area.

Fire Protection – Continue the grazing program to reduce fuel levels in grasslands.

Cattle Grazing Impacts Addressed in EIR: No EIR in document.

Carquinez Strait Regional Shoreline – C&H and Fischer Properties

Document Title: Land Use Plan Amendment

Date Adopted: 11/2/99

Resolution No: 1999-11-257

EIR Certification: NA

Updates: None

Acres Grazed: 1,300

Range Analysis Completion Date: 6/29/99

Cattle Grazing References: Yes

Grassland management involves the use of grazing, mowing and/or burning.

Historical livestock grazing in the Crockett Ranch Unit of the C&H property has maintained the overall vegetation complex in a mid-successional stage of

development. Interspersed thickets of coyote brush are being prevented from encroaching into colonizing the open grassland areas as a result of persistent grazing pressure. The patchwork configuration of woodland, grassland and shrubland in its present form offers a variety of habitat types that support a healthy diversity of plant and animal life.

These are excellent examples of the BM at work. Similar statements occurred throughout this document relating to all types of vegetation in this park. This document, compared to those written in previous years, demonstrated an entirely new writing style where the BM spin machine is running at full throttle. Of all the LUP documents provided, this document is the best example of the District's open display of their lack of knowledge of what cattle grazing really does to the land, wildlife and riparian areas. This was clearly the first LUP whose purpose was to sell grazing to the maximum extent possible.

Cattle Grazing Impacts Addressed in EIR: No EIR in document

Carquinez Strait Regional Shoreline – Waterbird

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA

Updates: NA

Acres Grazed: 117

Range Analysis Completion Date: 7/8/99 (1)

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

Anthony Chabot Regional Park (ACRP)

Document Title: Land Use – Development Plan / Environmental Impact Report

Date Adopted: 2/21/84

Resolution No: 1984-02-44

EIR Certification: State Clearinghouse No. SCH# 82072713

Updates: Report cover indicates document includes 1993 and 1995 LUDP Amendments. However, the body of the document does not reflect any such amendments or supporting data.

Acres Grazed: 2,475

Range Analysis Completion Date: 12/29/93; Fairmont Ridge analyses have no date.

Cattle Grazing References: Yes

Vegetation – Coyote brush should be controlled, Grass Valley should be returned to grassland from coyote brush.

Graze cattle to reduce fire hazard and brush encroachment.

Grazing can reduce fuel and encourage open grassland.

Dog droppings are a health hazard in the parks. [Nothing mentioned about the tons of cattle feces dropped in the parks]

Grass Valley will be maintained as a grassland by first initiating brush removal by fire or mechanical crushing. The area will be maintained as

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grassland by fencing it, developing water sources and introducing livestock. [i.e. cattle ranch conversion (using BM terminology)]

The Cow Hollow portion of ACRP by continued grazing with livestock.

The District will set aside certain grassland areas where ecological succession from grassland to brushland is occurring for the scientific study of this phenomenon. [Study never occurred – District has no record of any such study.]

Rationale for grazing: the Grass Valley area very probably has been a grassland since the end of the ice-age, due to the combined effects of grazing by large animals.

The specific areas defined for preservation were selected because the grassland can be maintained as the primary vegetative cover with the least visual change from current (1983) conditions. The policy to use livestock as a method of preserving grassland is recommended because livestock grazing would approximate prehistoric vegetative conditions. [i.e. let's keep it as cattle ranch (using BM terminology)]

The use of domestic livestock for this purpose will provide removal of excess grass biomass produced by the non-native annual grasses. Without such a removal, thatch tends to build up and inhibit the growth of the native grassland herbs.

Cattle Grazing Impacts Addressed in EIR: No

The EIR had the following comment from a park user during a public hearing 12/7/83:

“Grazing can result in a decrease of park use because of (1) bulls scaring away hikers, (2) excessive cow dung making hiking unpleasant.”

The District's response to this comment was:

“The overwhelming majority of visitors to ACRP use facilities such as the Motorcycle Hill, the Equestrian Center, the Marksmanship Range, the Public Golf Course, the Chabot Marina, and the reservable and family campgrounds. No grazing is proposed in these areas, so no conflicts are likely and no substantial reduction in Park use is likely. The reintroduction of grazing in the Grass Valley area will act to halt the process of brush invasion of grasslands, thereby assuring the future possibility of cross-country and trail-side activities to hikers in that area. Conflicts between cattle and hikers are rare events, because of the relatively few numbers of bulls in a typical herd, because EBRPD tenants routinely remove unruly animals from District lands, and because of the relatively short segments of trail passing through the identified grazing area.” [How's that for talking around the entire comment without addressing the two key issues the person brought up: public safety and excessive cow feces on the trail. Neither one was properly addressed. The BM at work!!]

Contra Loma Regional Park (CLRP)

Document Title: Land Use Development Plan

Date Adopted: 10/7/75

Resolution No: 1975-10-194

EIR Certification: None indicated.

Updates: Report cover indicates document includes Antioch Community Park at Contra Loma August 1989 LUDP Amendment and EIR/EIS. However, the body of the document does not reflect any such amendments or data.

Acres Grazed: 400, Range Analysis indicates 451

Range Analysis Completion Date: 12/29/93

Cattle Grazing References: Yes

*Natural Environment Unit – Forest and land management techniques such as tree cutting, controlled burning, reforestation, and planting programs using indigenous plant materials, and **cattle grazing may be used to preserve, maintain, or re-create the desired environmental setting.** (This was included in the plan as a reference from the Master Plan, page 10). The plan then declares: The ridges on the northeast and particularly the southern side of the park provide enjoyable panoramic views. This undisturbed area is rangeland for cattle and habitat for many nature animal and plant species.*

***Vegetation Management Plan --** The dominant plant community at Contra Loma is grassland. Although this community is now composed of European grasses rather than the original native California grasses the visual qualities are probably similar to the way they were when man first migrated into the area.*

Since the District assumed recreation management responsibilities of Contra Loma, it has continued historic land management practices of grazing, mowing, and discing, because they are appropriate land uses for the severe site conditions, maintain the landscape character, provide good fire protection and yield an economic return on land that is unsuitable for many other types of use.

*The primary function of this program is, however, to reduce the fire hazard by decreasing the amount of potential fuel on the ground and by providing fuel breaks. Mowing and haying are done on the flatter areas while the slopes are grazed, (barbed wire fencing is necessary to restrict the cattle to desired locations). **Discing offers the most fire protection and is used around the periphery of the park and recreation area.***

Cattle Grazing Impacts Addressed in EIR: No mention of cattle throughout the EIR.

Del Valle Regional Park

While the author requested copies of all LUPs, the District was unable to provide a copy of the Del Valle LUP/EIR which was allegedly completed in 1971. Del Valle is listed on the Status Planning sheet as having 2,500 acres of grazed land. If the District was unable to provide this document, one can only assume that it does not

even have a copy. So what is the District using to guide them in the management of this park?

Range Analysis Completion Date: 12/29/93

Diablo Foothills Regional Park

This particular park is one that is directly adjacent to the Mt. Diablo State Park, which has clearly stated that cattle grazing is an activity that is not conducive to preservation of natural resources. Interestingly enough, this document is notably lacking any similarity to the Mt. Diablo State Park EIR in terms of identified cattle grazing impacts. This document makes no mention that the state park eliminated cattle grazing as a vegetation management tool.

Document Title: Land Use – Development Plan / Environmental Impact Report

Date Adopted: 5/21/91

Resolution No: 1991-5-147

EIR Certification: None Identified

Updates: None

Acres Grazed: 1,000

Range Analysis Completion Date: 12/29/93

Cattle Grazing References: Yes

The following references to grazing identify required actions to stated District policies. While this gives the appearance that something will be done, the District has no records or studies to verify that the necessary monitoring is being completed in order to assess whether such actions are actually being completed.

***Natural Resources Management Plan** – Livestock grazing, mechanical treatment, hand clearing and prescribed burning will be used to meet fire hazard reduction objectives. Fencing will be constructed to exclude livestock from the Pine Canyon Area springs and seeps.*

***Recreation Need and Demand** – public meetings suggested grazing should/should not be allowed.*

Grassland & Woodland Understory Vegetation:

***Policy:** grassland and woodland understory vegetation will be managed to achieve fire hazard reduction objectives, enhance species diversity and maintain a high representation of native plants.*

***Required Action:** Livestock grazing, mechanical treatment, prescribed burning, integrated pest management, habitat protection, and/or other proven methods and practices will be used to meet management objectives.*

***Policy:** Management will be conducted to maintain and enhance the existing indigenous vegetation.*

***Required Action:** Severely disturbed sites with a potential for erosion will be stabilized as rapidly as possible by establishing herbaceous plant cover. All seeding will take place in the proper season. Livestock and recreational use may be deferred to promote plant establishment.*

Oak Woodlands:

***Policy:** Plant diversity in woodlands will be encouraged by maintaining a mosaic of woodland types of different age and size classes to provide structural diversity and sustain production and recruitment of tree species.*

***Required Action:** Prescribed burning, thinning of forest stands, adjustment of grazing practices, protection of oak seedlings from local genetic stock may be used to encourage stand regeneration and maintain biodiversity.*

Shrublands:

***Policy:** Prescribed burning and other appropriate management measures will be used, where necessary, to meet fire and resource management objectives in shrublands. The District will take appropriate action when excessive shrub growth increases fire hazard conditions, diminishes existing plant or wildlife habitat, or interferes with public recreation and enjoyment. [How does the District go about making such assessments that are stated in the last sentence? Such decisions are based upon subjective opinion, of which local wildlife have absolutely no influence. Such statements are intentionally non-specific and fit perfectly into the BM.]*

***Required Action:** Appropriate management, which may include the use of livestock grazing, mechanical methods, prescribed burning, and/or chemical treatments, will be used to address brush control issues on the park.*

Fire Management:

***Policy:** The District will abide by all EBRPD fire safety standards. Environmentally acceptable, economically feasible, methods will be employed to maintain fuels at desired levels.*

***Required Action:** Livestock grazing, mechanical treatment, hand-clearing, and prescribed burning will be used to meet fire hazard reduction objectives on the park. Fuel reduction activities in woodlands may involve reducing or eliminating understory fuels and/or breaking up the continuity of vertical fuels between ground level and the crowns of trees. Trees may be thinned or removed, as appropriate, to minimize fire hazard conditions.*

Livestock Grazing:

***Policy:** Diablo Foothills Regional Park will be used for livestock grazing in conjunction with State Park land that has been designated for grazing as part of a ranching interpretation program on Mount Diablo State Park. This program was identified in the General Plan for Mt. Diablo State Park, which was adopted by the State Park and Recreation Commission in November, 1989. Livestock grazing will be used as the primary vegetation management tool on all areas of Diablo Foothills Regional Park, with the exception of Pine Canyon. [This is an intentionally misleading policy statement. The District leads you to believe that the EBRPD was to be part of the Mt. Diablo interpretive ranching program. This is a deliberate misrepresentation. The*

Mt. Diablo General Plan does not make any such reference to the inclusion of EBRPD land to the interpretive ranching program.]

Required Action: *Livestock grazing will be managed according to accepted range management principles and standards. Proper stocking levels will be determined using a scientific method of analyzing forage production on the various soil types found within the park. Monitoring will be conducted to verify compliance to established standards for livestock use, and to insure conformity to lease provisions. Livestock will be excluded from areas otherwise suitable for grazing when exclusion is dictated by the need to protect other resource and recreational values. Other management options, such as prescribed burning, mechanical, and chemical methods will be used in conjunction with livestock grazing, when and where appropriate. [Once again the BM at work...the District was unable to provide any reports of scientific monitoring of the effects of cattle grazing in any of its parks since its inception.]*

Wildlife:

Policy: *Enhance ponds and springs to benefit wildlife especially where disturbance from feral animals and livestock warrant concern.*

Required Action: *Limit disturbance by fencing ponds and springs. Develop springs for wildlife, livestock, and visitor use using proven techniques.*

Cattle Grazing Impacts Addressed in EIR: Yes

The EIR, which was prepared for the District by Environmental Science Associates (www.esassoc.com), was 46 pages. **This was the first and only EIR that openly admitted that livestock could have an impact on vegetation and wildlife.** One of the statements draws conclusions about potential impacts based upon past history of the Park District with regard to grazing practices. There was no basis provided for such a statement and the author's findings indicate that statements such as these are most likely unfounded. Included were the following grazing-specific impact references:

Natural Resource Management Practices (NRMP):

*The natural resource management practices proposed in the NRMP have been designed to benefit the Parks vegetation and wildlife resources. For the most part, there would be no adverse impacts associated with them. However, **livestock grazing**, fire management practices, and the construction of facilities proposed in the NRMP (e.g., fencing and water holding tanks) potentially **could have some direct or indirect adverse impacts on vegetation and wildlife.***

*Under the NRMP, livestock would be excluded from Pine Canyon, but grazing would continue throughout the rest of the Park. **Grazing potentially could disturb vegetation and wildlife habitat by direct removal of vegetation** or by changing erosion and sedimentation patterns. Native grasslands would be especially susceptible to damage from heavy grazing; however, the area to be grazed does not contain significant native grasslands. Grazing management techniques included in the NRMP, and practiced by EBRPD in the Park in the*

past, would reduce the potential for erosion and sedimentation impacts to negligible levels.

Special Status Species:

Facilities development and natural resource management practices included in the LUDP would not adversely affect any of the special status plant species occurring or potentially occurring within the Park (fragrant fritillary, Mt. Diablo fairy lantern, crimson sage, yerba mansa, Diablo rock-rose, Mt. Diablo buckwheat, and Brewers dwarf flax). The exclusion of livestock from the Pine Canyon area would be beneficial for several of the Parks special status plant species. [How is it that livestock exclusion from areas other than Pine Canyon that have these special plant species is not considered as beneficial? Because they are grazed, of course!]

The effort to reintroduce the peregrine falcon to the area could be adversely affected by increased human activity in Pine Canyon, although the District would take action to limit human disturbance during falcon nesting and breeding season (see mitigation measures). Other predatory birds (the golden eagle and the prairie falcon) would not be adversely affected by the LUDP. As discussed above, the Alameda whipsnake potentially could be affected by fire management practices. There would be no adverse impact on the western pond turtle or red-legged frog. [The red-legged frog is a threatened species and its habitat should be protected however, this report indicates it is not necessary. This position was further represented during the GRTF.]

Mitigation: *The District would continue to use livestock grazing to achieve vegetation management objectives, in accordance with accepted range management practices.*

To protect riparian and other wetland areas, the District would construct fencing to exclude livestock from the Pine Canyon area as well as from springs and seeps. This action would also serve to restrict grazing from areas where special status plant and animal species are known to occur, with the exception of areas containing the fragrant fritillary plant. Livestock grazing, which limits the build-up of a thatch of dead grass, is thought to be beneficial to bulbous plants like the fragrant fritillary (Lindenmeyer, 1990). In eliminating surrounding grasses and weedy vegetation, grazing reduces the amount of competing vegetation.

Garin Regional Park (GRP)

Document Title: Land Use – Development Plan / Environmental Impact Report

Date Adopted: 11/23/76

Resolution No: 1976-11-337

EIR Certification: SCH# 76090707

Updates: None.

Acres Grazed: 3,701; Range Analyses show 4,376; LUP indicates that the park occupies 696 acres with 1,255 acres \to be added at some future date. So this LUP only applies to 16% of the land currently grazed and thus obviously out of date.

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Range Analysis Completion Date: 12/29/93 (4 analyses); 10/29/96 (1 analysis)

Cattle Grazing References: Yes

Natural Resource Management Plan:

The natural areas of Garin Regional Park provide habitat for a wide variety of plants and animals. Programs designed to increase the area of brush and woodland can add to this diversity, as about 85% of the park's area is currently grassland. Because of its relationship to the brush/grassland balance, grazing is of prime importance to overall resource management. [A suggestion that increasing brush and woodland is favorable to diversity is contrary to the position of the current board and upper management. This report was written by an earlier generation of EBRPD staff.]

Grassland & Grazing:

Retain grazing at the present low level. Exclude grazing from the Recreation Cluster, retaining grassland by mowing as appropriate. Graze the southwest corner of the park for fire protection purposes.

Site Considerations – Resource Analysis:

Hydrology and Water Quality – *Newt and Jordan Ponds can be expected to be a continuing major maintenance responsibility due largely to problems of siltation and erosion. [Jordan Pond bank damage by cattle noted in EIR – see below. Siltation is most likely a direct result of same.] These maintenance requirements can be expected to conflict with habitat and educational values. The Newt Pond, currently functioning as a siltation basin, is visually unappealing. [Public Hearing 6/9/76 – public encouraged District to allow Newt Pond to recover its riparian vegetation growth by leaving it alone for a few years and keep the cattle out.]*

Vegetation – *The extensive grassland and lack of brushland reflect the long history of grazing at a moderate to high level. Reducing or eliminating grazing will result in an increase in brushland and possible increase in fire hazard. [implies a no-win situation] The woodlands are limited in extent and provide valuable visual variety and shade. The exotic vegetation in the parks generally is characteristic of the plantings.*

Cattle Grazing Impacts Addressed in EIR: No

The EIR was 5 pages and no grazing impacts were identified, however, the following was noted:

Description of the Environmental Setting:

Natural Resources

Vegetation – *Little riparian vegetation grows around Jordan Pond, due to damage to the banks by cattle.*

Lake Chabot Regional Park

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA
Updates: NA
Acres Grazed: 282
Range Analysis Completion Date: Unknown
Cattle Grazing References: NA
Cattle Grazing Impacts Addressed in EIR: NA

Las Trampas Regional Wilderness

Document Title: Land Use – Development Plan / Environmental Impact Report
Date Adopted: 11/2/93
Resolution No: 1993-11-291
EIR Certification: None Identified
Updates: None.
Acres Grazed: 2,626
Range Analysis Completion Date: 12/30/93 (4)
Cattle Grazing References: Yes

This document, being quite comprehensive, contained numerous references to cattle. However, the references were very brief and fell into two categories: riparian area protection and fire protection.

Resource Protection Measures:

Installation of exclosure cattle fencing along creeks and springs.

Continuation of grazing both to promote plant and wildlife diversity and to provide fire protection for park and surrounding areas.

No further cattle grazing references will be offered from the LUP as they tend to be repetitive.

Cattle Grazing Impacts Addressed in EIR: Yes

The EIR, which was prepared for the District by EA Engineering, Science & Technology (www.eaest.com), was 91 pages. **This EIR was the most comprehensive from an overall perspective.** For example it included detailed water quality measurements, primarily due to the presence of Las Trampas stables. This was a significant pollution source that was causing fecal coliform counts in Bollinger Creek that exceeded state water quality standards.

While the document was generally comprehensive in identifying a variety of impacts, it was notably deficient in addressing cattle grazing impacts. In fact, given the professional nature of this EIR, such a deficiency is highly suspect.

For example, even though the coverage of the water quality issue was quite good, it failed to address the impacts of upstream cattle on the fecal coliform counts in Bollinger Creek. Another example is the lack of any mention about the erosion effects caused by cattle, while attributing the effects only to bicycles and hikers. This is contrary to the geologist's report at the back of the document identifying grazing as one of the causes of earthflows, debris slides, soil creep and gullyng.

The impacts of cattle grazing on wildlife and plant habitat were completely disregarded. The EIR described the importance of grasslands and shrublands to wildlife. For example, grasslands are said to “...create a diversity of habitats even within the grasslands themselves...” When the grasslands are predominantly trampled and overgrazed by cattle, it is difficult to see how anything other than a non-diverse habitat is possible.

Finally, the following was found in the *Summary of Preferred Alternative*.

No Grazing – Grazing is a primary vegetation management technique to reduce wildland fire hazard, maintain and enhance native plant diversity, and minimize the encroachment of opportunistic brush species such as coyote brush, poison oak, and broom into open grasslands. Removal of grazing presents several potential adverse impacts, which include: removing a cost-effective fire safety mechanism that provides a measure of protection to residential areas in close proximity to park land; diminishing biodiversity when, over time, introduced grasses displace native forbs as a result of withholding active management in grassland areas; and reducing revenues, which may affect park maintenance activities.

This statement was quite unexpected given the low profile of cattle grazing impacts given in the document. This statement is another example of the BM actively employed. While the water quality section was substantiated with scientific data and measurements, the last statement is simply conjecture with gross exaggerations. The District was unable to provide any data that could substantiate these assertions.

Mission Peak Regional Park

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA

Updates: NA

Acres Grazed: 2,920

Range Analysis Completion Date: 12/30/93

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

Morgan Territory Regional Preserve

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA

Updates: NA

Acres Grazed: 3,400; Range Analysis shows 3,920

Range Analysis Completion Date: 9/23/93 (1); 10/11/93 (1); 12/14/93 (5)

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

Ohlone Regional Wilderness

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA

Updates: NA

Acres Grazed: 6,450

Range Analysis Completion Date: NA
Cattle Grazing References: NA
Cattle Grazing Impacts Addressed in EIR: NA

Pleasanton Ridge Regional Park

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA

Updates: NA

Acres Grazed: 3,942; Range Analysis shows 4,261

Range Analysis Completion Date: 6/16/93 (1); 10/12/93 (1); 12/30/93 (7); 10/17/95 (1)

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

Point Pinole Regional Shoreline

Document Title: Land Use – Development Plan / Environmental Impact Report

Date Adopted: Document had no date, Status Planning Sheet indicates 1976

Resolution No: None Identified

EIR Certification: SCH# 76042678 (referenced in a letter at the back of the document).

Updates: None.

Acres Grazed: 2,626

Range Analysis Completion Date: NA

Cattle Grazing References: No

The following comments, relating to shrublands and habitat diversity, are in sharp contrast to the current management perspective that every shrub is an encroacher and should be extirpated.

Natural Resources Management Plan - Summary:

Brushland – encourage brushland in designated areas to increase habitat diversity.

Natural Resources Management Plan:

Brushland – brushland should be encouraged to increase vegetation diversity. This in turn increases cover for animals that live in the brushy areas and feed on the edges of the brush or in the grasslands.

Cattle Grazing Impacts Addressed in EIR: No mention of cattle whatsoever in the document.

The 14 page EIR was prepared by the District.

Round Valley Regional Preserve

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA

Updates: NA

Acres Grazed: 1,800; Range Analysis shows 1,992

Range Analysis Completion Date: 7/14/96

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

**Robert Sibley Volcanic, Huckleberry Botanic, and Claremont Canyon
Regional Preserves**

Document Title: Land Use – Development Plan / Environmental Impact Report

Date Adopted: 9/26/85

Resolution No: 1985-09-281

EIR Certification: SCH# 85052106

Updates: None.

Acres Grazed: 400; Range Analysis shows 225

Range Analysis Completion Date: 12/30/93

Cattle Grazing References: Yes

Natural Resources Management Plan

Vegetation (Grasses Policies) – The three primary methods of grassland maintenance will be livestock grazing, mechanical manual clearing and use of prescribed burning. Grazing will be the primary method of maintaining existing grasslands in Sibley and it will be expanded to new areas as stands of brush are reduced.

There is a natural propensity for other types of plants such as shrubbery to grow on East Bay grasslands. However, there is a bias of the District against other plant life forms that are not grasses (i.e. non-viable cattle forage) and this is illustrated by the following paragraph. Coyote Brush (*Baccharis pilularis*) is a native California plant yet the District seems to have a policy that it must be extirpated from any grassland.

For several decades coyote brush has expanded its coverage in the East Bay Hills. As it has become established it has made foot travel [and cow travel] more difficult and has reduced the accessibility of those portions of the Preserves in which succession to coyote brush-dominated brushland has taken place. [“Dominated” is a highly subjective interpretation and most likely grossly exaggerated for the sake of discouraging this very natural occurrence in favor of livestock forage.] Succession to brushland is particularly undesirable where it reduces access on relatively level terrain not otherwise inaccessible for reasons of slope. The grasslands on the upper slopes of the Panoramic Ridge in Claremont Preserve and north of Roundtop in Sibley Preserve both of which are accessible areas, would be reduced in size as the successional process advances and coyote brush establishes increasing cover. For this reason, invasion into grasslands should be retarded by livestock grazing, mechanical-manual methods or the use of prescribed fire.

The rationale for using prescribed fire or livestock grazing for fuel reduction and vegetation management in brushlands is:

“...because these methods more closely approximate natural processes and are more cost-effective”

It is easy to understand that prescribed burning would represent a natural process, but what natural process does the use of livestock represent when one considers the wide-ranging nature of the negative impacts of its use?

Water Quality

Where grazing animals are present, surface water sources such as springs and seeps will be fenced to protect them from damage by livestock.

Cattle Grazing Impacts Addressed in EIR: Yes

The 29 page EIR was prepared by Royston, Hanamoto, Alley & Abey and Larry Seeman Associates, Inc. for the EBRPD. In the initial Summary at the beginning of the EIR the following statement can be found:

The primary management actions proposed in the Natural Resources Management Plan (NRMP) are continuing and expanding grazing at Sibley, fuel reduction in stands of brush and eucalyptus, reducing erosion from trails and the quarries at Sibley, and removing exotic vegetation.

The statement is quite contradictory, given the data presented in this report. Expanding grazing is inconsistent with reducing erosion from the trails and removing exotic vegetation as livestock grazing has been shown to be the primary cause of erosion and the spread of exotic vegetation.

Generally speaking, this EIR covers the impacts of cattle grazing in a very cursory manner. The only impact noted was in the Hydrology and Drainage section which had the following few sentences:

The freshwater pond on the floor of the south quarry would be fenced to exclude cattle from approximately two-thirds of its area. [Partial exclusion is no better than no exclusion from a water quality standpoint. It limits the trampling perhaps but does nothing to stop the urination, defecation and siltation of the pond.]

The fencing would improve water quality in the pond.

Direct livestock access to the two springs would result in trampling and removal of vegetation in the vicinity of the springs and a reduction in water quality.

As is typical with EBRPD EIR's, there are many other aspects of the impacts of cattle grazing that were ignored.

Sobrante Ridge Botanic Regional Park

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA

Updates: NA

Acres Grazed: 100

Range Analysis Completion Date: NA

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

Sunol Regional Wilderness

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA

Updates: NA

Acres Grazed: 6,100; Range Analysis only completed for 4,431.

Range Analysis Completion Date: 12/30/93 (4)

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

Sycamore Valley Open Space

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA

Updates: NA

Acres Grazed: 685

Range Analysis Completion Date: 12/30/93 (1); 2/25/98 (1)

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

Vargas Plateau

Document Title: No LUP/EIR Completed

Date Completed/EIR Certification: NA

Updates: NA

Acres Grazed: 1,030; Range Analysis shows 1,692

Range Analysis Completion Date: 1/13/96 (1); 10/29/96 (1)

Cattle Grazing References: NA

Cattle Grazing Impacts Addressed in EIR: NA

Vasco Caves Regional Preserve

Document Title: Resource Management Plan -- No LUP/EIR Completed

Date Adopted: 3/21/00

Resolution No: None

EIR Certification: NA

Updates: None.

Acres Grazed: 700

Range Analysis Completion Date: 7/19/96

Cattle Grazing References: Yes

Since this document was written very close to the start of the GRTP process, the document gives the appearance that grazing is well managed at this park and within the District in general. However, writing the words and actually following through on grazing management as written are two different things. The District seems unable to do the latter. They write all the right words and then do something completely different. There are a number of references in this plan that include verbiage that is not part of the typical boiler-plate statements the District often uses. While this indicates that the topic of cattle grazing is receiving more consideration and public scrutiny in the parks, there are still many problems with the District's policies and lack of follow-through.

Recommended Actions

Restricted livestock grazing will continue within the park as a fire prevention and resource management tool. [Note that this area is completely surrounded by open space which begs the question is fire protection necessary.] Cultural resources will be monitored for human impacts, livestock grazing and weathering.

Fencing

The extent of grazing activity on the preserve is currently determined by the location, presence or absence of fencing. There is no fencing along the north, northwest, east and extreme southwest boundaries of the preserve, which allows livestock access to public land from adjacent private property. [How can this be allowed? In the previous paragraph the District indicates that the park will have restricted livestock grazing yet there is no fencing and livestock can graze from private land! What is quite troubling is the fact that there are many sensitive wildlife species and cultural resources in this park.]

Water

Brushy Creek & three associated ponds – None of these areas appear to be adversely impacted by livestock. The fact that fairy shrimp have continued to survive in association with or despite long-term grazing in the area suggests that any management approach should take this into consideration. [This is a common approach taken by the District: if the various wildlife species still exist in the park then grazing is not a negative impact. This statement is scientifically baseless and shows little depth of understanding in predicting and managing trends that could eventually result in extirpation of a species. Presence of a species does not imply safe habitat conditions for that species.]

Resource Management and Public Access Plan

Rangeland Vegetation – Livestock grazing will be the primary tool for managing vegetation on the preserve due to its practicality and cost-effectiveness in preventing fire and maintaining biodiversity. [Standard EBRPD policy line is no admission that there may be negative impacts. The priorities are practicality and cost-effectiveness not ensuring preservation of wildlands and their flora and fauna. Maintaining biodiversity is a very deceptive statement. It is important to note that frequently the District is maintaining biodiversity where there is none. Such statements are yet another example of the BM in action.]

Conduct a seasonal livestock grazing operation on the preserve, which allows alternative periods of grazing and rest. Allow livestock grazing on the preserve from October or November through April or May, with flexibility to adjust animal numbers and season of use to existing range conditions. [First of all, the District does not monitor range conditions. Secondly, the rest period occurs when there is no growth so how does this allow for vegetation regeneration, which is the sole purpose for a rest period?]

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Eliminate or regulate, through the use of exclosure fencing, or herding livestock grazing in areas of the preserve that contain sensitive riparian and wetland resources. These areas include Brushy Creek, including the pond environments within the streamcourse, the small drainage below the first set of rock outcrops north of Vasco Road, and the spring-fed drainage in the northwest portion of the Preserve. Make accommodations to ensure that alternate water sources are available to provide drinking water for livestock.

Locate livestock water storage facilities on dry land away from the spring source and maintain the integrity of the associated wetland by either: (1) allowing excess water from the trough or tank to back up to the source by installing float valve mechanisms and pressure release fittings in the plumbing, or (2) by directing overflow water from the trough into a nearby natural drainage channel. [The concept of locating livestock water storage facilities on dry land away from riparian areas or wetlands to minimize damage to riparian areas is a myth. It sounds good but does little to alleviate damage. Cattle are inherently lazy, they will drink from the riparian areas when they are close to them and drink from the water storage facilities when close to them. SVOS-N has 3 locations where livestock can satisfy their thirst but all the riparian areas accessible to cattle are still being trashed.]

Manage grazing to ensure appropriate levels of residual dry matter [RDM]. [It has been well demonstrated from this report that the District certainly does not monitor RDM.]

Manage land to enhance native grasslands (required on 169 acres of Habitat Management lands [HM lands] to benefit kit fox habitat).

The District allows cattle grazing in this preserve that is identified as kit fox habitat. The National Wildlife Federation stated the following about the kit fox:

The San Joaquin Kit Fox, a subspecies of the Kit Fox, is on the U.S. Endangered Species List. It is classified as endangered in California. Before the 1800s, the grasslands of California were second in size only to the Great Plains. Today only 1 percent of the state's native grasslands remain [cattle grazing being a significant contributor to this loss of these grasslands]. The San Joaquin Kit Fox is a grassland and scrubland inhabitant and has suffered from the modification of these habitats. Industry, development, and various types of agriculture (in the forms of row crops, orchards, vineyards, and livestock forage) have taken over many of these lands. Suitable remaining habitats are fragmented, meaning the foxes occur in small and isolated populations.

This indicates that cattle grazing is detrimental to the survival of the kit fox, yet the District finds it satisfactory to continue cattle grazing in this preserve.

Cattle Grazing Impacts Addressed in EIR: No EIR in document

Wildcat Canyon Regional Park

Document Title: Land Use – Development Plan / Environmental Impact Report

Date Adopted: 9/10/85

Resolution No: None

EIR Certification: SCH# 84021408

Updates: None.

Acres Grazed: 2,240; Range Analysis shows 1,775

Range Analysis Completion Date: 12/30/93

Cattle Grazing References: Yes

Parkland Classification and Purpose

The visual character of Wildcat Canyon Regional Park (WCRP) represents a landscape that is quickly vanishing from the Bay Area – the grasslands caused in historic times by cattle grazing, and perhaps by Indian fires and tule elk grazing. [Interesting statement indicating we need to preserve what conditions cattle grazing has created!]

The document identified 7 special protection unit areas that contained endangered plant species. Areas S-1 through S-5 were dedicated to the Santa Cruz tarweed (*Holocarpha macradenia*). Special management included continued cattle grazing.

Special Protection Units

*The Santa Cruz tarweed (*Holocarpha macradenia*) is an annual herb whose range is now limited to Contra Costa, Marin, Monterey and Santa Cruz Counties. This plant has been introduced in eight separate localities in areas of moderate grazing pressure. It has survived and is successfully reproducing in Wildcat Park. This officially protected plant has been classified as endangered under the California Native Plant Protection Act. Special management required for this plant includes monitoring by staff, continued cattle grazing and removal of any invading thistles and shrubs.*

While this suggests that the District simply continue cattle grazing to protect this species, the US F&WS makes the following point:

*Activities that, when carried out, funded, or authorized by a Federal agency, may directly or indirectly destroy or adversely modify critical habitat for *Holocarpha macradenia* include, but are not limited to:*

*(1) Activities that alter watershed characteristics in ways that would appreciably alter or reduce the quality or quantity of surface and subsurface flow of water needed to maintain the coastal terrace prairie habitat. Such activities adverse to *Holocarpha macradenia* could include, but are not limited to, maintaining an unnatural fire regime either through fire suppression or prescribed fires that are too frequent or poorly-timed; residential and commercial development, including road building and golf course installations; agricultural activities, including orchardry, viticulture, row crops, and livestock grazing; and vegetation manipulation such as harvesting firewood in the watershed upslope from *H. macradenia*;*

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(2) Activities that appreciably degrade or destroy coastal terrace prairie habitat, including but not limited to livestock grazing, clearing, discing, introducing or encouraging the spread of nonnative species, and heavy recreational use. As noted earlier in the rule, some form of grazing may be helpful if it maintains open habitat and decreases competition from other species.

Merely continuing cattle grazing without consideration of grazing pressure is irresponsible and will not necessarily result in protection of the species.

Water Resources:

Limit access to riparian zones, especially cattle access, through fencing.

Vegetation:

Maintain grassland as the dominant cover of the Park through cattle grazing.

Future Studies to be Carried Out:

Prepare a long-range water management plan to study the Tilden/Wildcat Canyon Park section of Wildcat Creek watershed and its problems associated with sedimentation and chemical water quality as well as fish planting and the management of Lake Anza and Jewel Lake. This study will be executed as part of the LUDP for Tilden Regional Park.

Prepare a long-range grazing management program to study the effects of seasonal rotation of cattle, pasture deferment, and soil management as well as the relationship, if any, of pest plant species and grazing. This program will be developed by the District Grazing Manager and the WCRP Supervisor.

After reviewing the District's LUP/EIRs, it appears that **many statements are made as to what the District plans to do to mitigate various impacts but the reality is that the identified plans are often not implemented.** For example, the author requested the above studies and the District was unable to provide them because the District apparently has never completed them.

The District will construct new cattle enclosure fences around springs, seeps and ponds which are being adversely affected by heavy cattle use.

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Here are examples of how springs, seeps and ponds are being protected at Wildcat Canyon, 16 years after this plan was written:

Substantial erosion is occurring along trails and maintenance roads. This condition is caused by a number of factors: Soils that are slow to drain; difficult access for maintenance during winter months; inconsistent maintenance of trail areas; and some over-running of trail areas by cattle. The two items that can be improved are trail maintenance and cattle control. Restricting cattle from principal trail's and roadways is particularly important during winter months when soils can puddle and mud makes trails and roads impassable to vehicles and even foot traffic. Further reasons to restrict cattle from the Wildcat Creek Trail are that they sometimes intimidate park users and that there is only minor grazing area below the roadway.

Erosion Protection – *The District will restrict cattle, horses and foot traffic from entering riparian zones in order to prevent unwanted soil erosion and resultant sedimentation. Regarding cattle, this policy will be carried out by placement of salt-licks and water sources, through monitoring and control of cattle movements and through fencing. Another method for reduction of cattle impact on riparian zones may involve seasonal rotation of cattle locations and herd size. This is discussed more fully under vegetation management policies. Probably equestrian and hiker impact on riparian areas has been slight; however, trails and use areas will be sited and developed to discourage access to streams.*

Vegetation – *The District will maintain grassland as the largest single vegetation cover within WCRP. This policy represents a continuation of existing conditions. **The primary means of maintaining grassland and preventing succession to brushland will be cattle grazing.***

The District will prepare a Conservation Plan with the assistance of the U.S. Soil Conservation Service in order to plan long-range grazing management



and to retain the optimum "carrying capacity" of the Park's grasslands while still permitting grazing to be continued in a manner that is economically viable. The Conservation Plan will assess the potential for seasonal rotation of cattle, pasture deferment and occasional pasture rest as well as grazing impact on soil management and the relationship, if any, between grazing and

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pest plant species. The timing and development of the Conservation Plan will be the responsibility of the District Grazing Manager and the WCRP Supervisor. [Another good thought with no follow-through. The District was unable to provide a copy of this plan.]

A reason for maintaining large areas of WCRP in grass is to provide a better setting for recreation. Brush, the immediate alternative to grass, is thick and difficult to walk through. Although it provides good wildlife habitat, brush essentially prohibits most human use of an area.

Vegetation management plans should recognize the desirability of the grassland vegetation type based on its natural and/or historic occurrence on certain sites, its suitability for active recreation, and its relatively low fire hazard; and should prescribe grassland as the final vegetation type where appropriate.

These statements reflect a very narrow-minded perspective and one that is quite contrary to the objectives of Master Plan 1997. Conservation of wildlife habitat is more important than the human recreational needs for the area. Human needs can be met quite easily by providing an adequate trail system. Consumption of wildlife habitat is considerably more difficult to replace. The displacement of wildlife by development puts the onus upon the District to reestablish alternate habitat on park wildlands as this is the last place wildlife have to go.

Grazing is safe, it generates a profit rather than a cost and, once fencing is established, requires little overhead. [This is a naïve statement – the District is unable to show that its grazing program with all associated indirect and intangible costs is actually a profitable or even a break-even operation.] The only major potential problem with grazing is accelerated soil erosion. There is no clearly established relationship between grazing and pest plant invasion. [This report illustrates that indeed there is a direct relationship. Numerous reports are available, including the Mt. Diablo EIR, that supports the author’s findings.] In addition, at WCRP grazing has been the traditional and historical use that has maintained grassland. In spite of these advantages, grazing does not maintain grassland indefinitely against brush succession. Therefore, prescribed burn is useful from time to time to control large masses of brush that are not vulnerable to grazing.

The intention of the Conservation Plan is to find an optimum balance between grazing and the condition of the grasslands and other vegetation resources. Wildcat Canyon has excellent soils for grassland production and for this reason grazing is considered an important component of park land management. However, much concern has been expressed about the effects of year-long grazing, degraded riparian environment and soil erosion. Thistle invasion is also considered by some to be a result of heavy grazing although thistle invasion is also occurring at Tilden Regional Park which has not been grazed in 40 years. [Concluding that cattle

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grazing is not the cause of thistle invasion because other locations without cattle grazing also have thistle present is unsound logic. It seems many of the District's policies are based upon anecdotal evidence because such a tactic justifies the existence of cattle in the parks.] *Year-long grazing can also have a negative effect on perennial grass expansion when cattle eat the green perennial grass forage rather than dry annual grasses in the late spring and summer.*

The possible advantages of a Conservation Plan are slowed thistle invasion, decreased grazing pressure on perennial grasses and riparian zones, and less grazing use of areas susceptible to erosion.

It is important that the Conservation Plan be implemented on a flexible schedule that works with the needs of the Park, the District and the economic and logistical realities of the cattle operator. [Here is the real truth!! Priorities for compensating and correcting for the impacts of cattle grazing are based upon the needs of the District and economical or logistical realities of the cattle operator!! Note that conservation and protection of natural resources is not even listed as a consideration. Herein lies the most revealing aspect of the problem with the District's grazing program. The current management and board will not admit that this is their hidden agenda. However, to those of us on the outside looking in, it is quite obvious. This begs the question as to whether the District board and upper level management are benefiting from this obvious conflict of interest at the expense of taxpayers, flora and fauna.]

Cattle Grazing Impacts Addressed in EIR: Yes

The 43 page EIR was prepared by *Dillingham Associates* (a landscape architect) for the EBRPD. *Dillingham Associates* was supported by the following organizations:

- *Duncan & Jones* - Environmental Planning
- *Alan Kropp & Associates* - Geotechnical Consulting
- *Philip Williams & Associates* – Hydrology
- *JHK & Associates* – Traffic Consultants

Geophysical & Biological Impacts

Geology/Soils – *no grazing impacts or mitigation noted. In the section on Fire Fuel Management Zones (p.66) the District states:*

The only major potential problem with grazing is accelerated soil erosion.

Given this is identified as a major problem and the fact that grazing has been ongoing for a number of years, there must be grazing impacts and mitigation necessary yet none were mentioned.

The soils are generally shallow, slightly to moderately acidic, and have moderate to high erosion potential. Almost all of the soils are poorly suited or unsuited for intensive agriculture, and are moderately to highly corrosive to uncoated steel. [This conclusion by geologists is completely contrary to

statements made in the Natural Resource Management Plan which support the extensive use of cattle grazing, and agricultural activity.]

No suggestions are made on pages 78 and 79 to mitigate the effects of cattle grazing on park geology yet the EIR mentions that cattle must be restricted from certain areas. This is effectively marginalizing the impacts of grazing as inconsequential.

Water Quality

Other ponds in WCRP are less than two acres in area and contain less than one acre-feet of water. The water quality in these ponds is not monitored, and they are used for livestock water supply and wildlife habitat enhancement purposes. [How can letting a water supply be used by livestock be considered habitat enhancing for wildlife? This is BM spin.]

Impact of the LUDP upon rare/endangered plants

Mitigation: None needed – the provisions of the LUDP would be beneficial in protecting and enhancing suitable habitats. [Cattle grazing can have detrimental effects on rare and endangered plant species. To ignore this fact is irresponsible.]

Noise

The sounds of voices (particularly children) would represent the most prevalent and audible sound characteristic of the park's use, and probably would not exceed intermittent peak levels of about 65 to 70 decibels. [Park District staff and the EIR preparer obviously do not live adjacent to a regional park that is grazed. Cattle are the most audible nuisance in parks. Cattle can be heard for distances approaching a mile at all hours of the day and night. This noise disturbance is quite obtrusive to the peaceful nature of the park experience and a nuisance to those who live in the vicinity of parks with cattle. This fact has never been addressed by the District or those who have prepared EIRs for the District.]

Visual Impacts – the District consistently fails to address the visual impacts of the extensive depositing of cattle feces throughout the parks. The pictures of SVOS-N in this report illustrate how predominant such conditions are in District parks. The obvious affinities that the District has for ranchers and their cattle apparently make cattle feces appear transparent. However, the District seems to ignore this fact even though it has been told on numerous occasions by park users that this is not the least bit conducive to a pleasant park experience.

Unavoidable Adverse Impacts

Potential increases in erosion following continued use of cattle grazing for vegetation management. [This is avoidable – don't graze!!]

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Cumulative Impacts

Increased and more effective protection of vegetation, wildlife and water resources would be expected as a result of the long-term ecological studies and enhanced levels of program efforts included in the LUDP. [It is doubtful that any such improvements ever occurred over the last 17 years since the District has consistently failed to complete any long-term ecological studies as indicated.]