



California Native Plant Society

ORANGE COUNTY CHAPTER

P.O. Box 54891

Irvine, CA 92619-4891

occnps.org

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The California Native Plant Society is a non-profit organization dedicated to the understanding and appreciation of California's native plants and how to conserve them and their natural habitats through education, science, advocacy, horticulture and land stewardship.

OCCNPS focuses that dedication on the native plants and remaining areas of natural vegetation in Orange County and adjacent Southern California.

Pat Bates, Chair
Orange County Board of Supervisors
10 Civic Center Plaza
Santa Ana, CA 92701

RE: Open Space Lands Transaction -- Letter of Intent

Dear Ms. Bates:

The Orange County Chapter of the California Native Plant Society (OCCNPS) was a member of the Stakeholders Advisory Committee for the 2007 Strategic Plan and is a regular participant in quarterly meetings with OCParks Director Mark Denny, organized by the Friends of Harbors, Beaches and Parks. OCCNPS' specific interest in OCParks is its very important role in the preservation and enhancement of the native plants and habitats in Orange County's wildlands.

OCCNPS understands that the intent has always been for The Irvine Company's (TIC) 20,000 acres of conservation lands to come under public ownership. We are in favor of that ownership change as long as the new owners have the stewardship mission and the financial ability to do the management, monitoring, and restoration required by the NCCP and conservation easement agreements now in place. We agree that OCParks has such a stewardship mission.

We are concerned that OCParks' Letter of Intent (LoI) re transfer of ownership from TIC to the County:

1. Makes no mention of setting up a permanent non-wasting endowment to cover management costs.
2. Does not well-analyze the transfer's likely recurring and long-term impacts to OC Park's budget and stewardship responsibilities.
3. Does not make it clear that the proposed deed restrictions will include the identical responsibilities and have the same legal force as the conservation easements now in place.
4. Seems to imply that the land management responsibilities may be permanently outsourced. The accompanying staff report does not identify OCParks, or any other entity, as in fact doing the management.

We ask that the Board of Supervisors require clarification of these points before approving the LoI.

Respectfully,

Celia Kutcher
Conservation Chair

cc: CNPS Conservation Team
Friends of Harbors, Beaches and Parks