

July 16, 2014

Paul A. Jensen, AICP
Community Development Director
City of San Rafael
P.O. Box 151560
San Rafael, CA 94915-1560



Canalways Property: Homeless Encampments and Invasive Species Removal

Dear Paul:

Thank you for your email of July 2 continuing your exchanges with Marin Conservation League and others regarding the problem of homeless encampments and the pampas grass at the Canalways Property. The encampments have resulted in a number of fires. We understand that the city's short-term focus is on removing the encampments and eliminating the immediate fire hazard posed by the pampas grass and that the preferred method is to engage a herd of goats. We support this method as long as the goats are properly managed and confined to the area of concern.

We would like to ensure that the measures taken also address the long-term aspects of the problem by removing the pampas grass by grazing and, with appropriate follow-up, ensure that it does not return. Secondly, we would like to see the City take advantage of the opportunity to remove other invasive plants on the property and, at the same time, provide work for San Rafael's disadvantaged populations, such as through the Streets Team. We also have two larger concerns, which we discuss following our recommendations for the property.

Our recommendations for the work on the property are as follows:

- Have the Streets Team, or others, remove the trash and debris on the site to make it a safe work environment, including for the health and safety of the goats!
- Have the Streets Team or the North Bay Conservation Corps cut and bag the pampas grass plumes to ensure that the hundreds of thousands of wind-borne seeds they contain are prevented from causing new infestations elsewhere;
- Have a goat herder reduce the biomass of the pampas grass (and, ideally, the Himalayan blackberry, fennel and other common weeds) on the defined portion of the site;
- Have the owner of the property use his debris box trucks, which are equipped with cables and powerful winches for loading debris boxes, to winch the remaining stubs of the pampas grass plants out of the ground and haul them off in debris boxes for composting (or engage a contractor to do so);
- (Desirable) Have a licensed applicator, in accordance with IPM principles, treat the stumps of the Himalayan blackberry and fennel to prevent regeneration, and;

PHONE: 415.485.6257
FAX: 415.485.6259

EMAIL: mcl@marinconservationleague.org
WEB: marinconservationleague.org

ADDRESS: 175 N. Redwood Dr., Ste. 135
San Rafael, CA 94903-1977



- Require the property owner, for the indefinite future, to mow or disc the uplands portion of his site at least once a year and as often as necessary to control common weeds and invasive plants.

We also have two more general concerns about the treatment of this property, which we view as an opportunity for the city to take broader steps to curb invasive plant species on private property. The city has an excellent opportunity to implement the General Plan's recommendation to develop a comprehensive program to manage invasive species on both public and private property, the centerpiece of which would be an enforceable invasive plant ordinance. It is time the city acted on this recommendation.

Our second concern is that the City appears ready to spend public funds to address conditions that we believe should be the responsibility of the owner to prevent the property from becoming a public and private nuisance. By allowing pampas grass to thrive there—a well-known invasive species that has harbored homeless encampments elsewhere—the owner has failed to do so. We understand that the city may feel that the homeless population is its responsibility, itself a debatable issue, but we believe that negligent maintenance of the property is the primary cause of the current encampments there, and we urge the city to take appropriate enforcement action to correct that situation. Once the owner fulfills his responsibility to remove these plants, any further encampment issues would rightly be the city's responsibility.

We thank you again for the opportunity to contribute to the resolution of conditions at this property and would be pleased to discuss our recommendations with you and other city officials in more detail.

Sincerely yours,



Nona Dennis
Chair, Parks and Open Space Committee



Paul Minault
Chair, Invasive Plant Subcommittee

cc: Barbara Salzman, Marin Audubon Society
Joseph Terry, U. S. Fish and Wildlife Service
Tim Dodson, California Department of Fish and Wildlife

¹The San Rafael General Plan 2020 Conservation Element Recommends that the City:

Consider the legality, feasibility and enforceability of an Invasive Plant Ordinance addressing the removal of invasive species on private and public properties. As part of the ordinance, evaluate the benefits and impacts of using herbicide on invasive species where there are no other feasible controls. Responsibility: City Attorney, Community Development

Action CON-15a, Invasive Plant Ordinance, Conservation Element, p. 297.