



COMMITTEE FOR
GREEN FOOTHILLS

January 12, 2011
San Mateo County Planning Commission
455 County Center, Second Floor
Redwood City, CA 94063

**Re: Coastal Development Permit and Mitigated Negative Declaration for PLN 2010-00093:
Fitzgerald Marine Reserve improvements to the Dardenelle Trail/California Coastal Trail
between North Lake Street and Cypress Avenue**

Dear Planning Commissioners,

On behalf of Committee for Green Foothills, I commend the Parks and Recreation Department for reducing the width of the trail and specifying an alternative material to asphalt for paving. The 8-foot wide trail, with a 2-foot downhill and 1-foot uphill shoulder, is an improvement over the initial 10-foot wide trail with 2-foot wide aggregate shoulders. However, I'm still concerned about the trail width and especially the grading and removal of vegetation adjacent to the trail. Many trails, including sections of the Coastal Trail that are multi-use and ADA accessible in parks, are less than eight feet wide.

The Master Plan for the Fitzgerald Marine Reserve recognized the area's remarkable natural resources through its guiding principles:

"The fundamental concept underlying the Master Plan is that protection of the outstanding natural resources of the Fitzgerald Marine Reserve will require a new approach to management of ecological systems and visitors in future years, and that the best way to accomplish this goal is to emphasize the sensitivity of the resource, to enhance the educational value of the Reserve, to manage visitation, and to limit use of the Reserve as a recreation destination."

Trails as well as other improvements need to protect the natural resources and provide visitors with a place to connect with nature while walking, riding a bicycle, or horse. The primary natural resources affected by trail improvements are San Vicente Creek, with its riparian corridor, wetland plant species along the trail, amphibians and birds, and the mature Monterey cypress forest. The revised project better fits with the natural setting, but CGF believes that additional conditions are needed to ensure the project does not impact habitat or species of concern.

Site Disturbance, restoration and revegetation:

1. The project includes a Seeding and Planting Plan (Sheet L-1) that shows extensive areas along the trail to be seeded with native erosion control seed mix. Note #2 on the Plan states: "Limit of seeding shall extend from trail edge to limit of grading, as shown on plans." The areas of grading and reseeded appear more extensive than necessary. Additionally, the trail, as designed, would impact a beautiful area of Western sword fern and rushes (a wetland species). The trail should be more narrow as it goes through the ferns and rushes in

order to minimize impacts. We suggest a new Condition of Approval be included that states: "The disturbance or removal of native vegetation shall not exceed the minimum necessary to construct the trail. In particular, Applicant shall minimize disturbance to the area of Western sword fern and rushes to the maximum extent possible. Any Western sword fern or rushes that must be removed by trail construction, shall be carefully removed, saved, and replanted as part of the revegetation of this area." Both of these plants will easily survive transplantation.

2. There are some areas of cape ivy within the proposed trail expansion. Cape Ivy is one of the most invasive pests plaguing streams and riparian areas on the coast. It is not well established yet in the vicinity of the Dardenelle trail, but if not removed now, it will spread and smother all vegetation. It is very important to remove all parts of the cape ivy well in advance of any disturbance or removal of soil, and spot treat resprouts with an herbicide. Any small piece of this plant, whether leaf, stem, or root, will resprout. Therefore any soil that is moved that contains established cape ivy roots or root segments will simply serve as a spreader of this pernicious weed.
3. Condition 12 addresses potential impacts to the Central Coast arroyo willow riparian habitat and requires plantings of willow on the north side of the creek at the bridge crossing. However, Parks planner Sam Herzberg has confirmed that the bridge crossing, as shown on the plans, will not impact arroyo willow habitat, so this mitigation is not necessary, and therefore no willow plantings are actually required. CGF is also concerned that there is no Condition of Approval that requires restoration of the abandoned section of trail once the new bridge is completed. CGF requests that Condition 12 be modified to require that as part of removal of the old bridge, the abandoned trail section in this area shall be restored through decompaction or scarifying of the compacted trail area, placement of soil over decompacted areas where appropriate, and revegetation which incorporates species native to the area, including willows adjacent to the stream. The restored area shall be maintained and monitored to ensure success.

Special Status Species:

1. San Francisco dusky-footed wood rat: The Biological Resources Assessment states that habitat for this species of concern exists in the riparian area. I carefully surveyed the area where the bridge is proposed, and did not find any evidence of stick houses where construction is proposed. That said, the mitigation measure included in Condition 5 is inappropriate. Did CA Fish and Game approve of this mitigation? Avoidance of impacting any stick houses (nest) should be paramount. If any stick house must be destroyed, observance and live trapping should be done by a qualified biologist to determine if it is occupied, and if so whether by a male or female. If by a lactating female, the nest should be left undisturbed for one month until the young are mature enough to be relocated.
2. Monarch butterfly: There has been no indication of the presence of Monarchs in this location and it is highly unlikely they occur in the trees of Fitzgerald Marine Reserve.

3. Tree removal: Condition 7 addresses measures to avoid disturbance to nesting birds from clearing of vegetation, but not from tree removal. Yet one 40" d.b.h. cypress, three dead cypress (44", 46" and 58" d.b.h.) are proposed for removal, and possibly four more live trees (40" d.b.h. cypress, 48", 40", and 40" d.b.h. eucalyptus). Condition 27 should be expanded to prohibit removal of any trees during the nesting season, and avoid felling of trees into sensitive areas including the archaeological area, the creek and its riparian area.
4. California wild strawberry: There is no California wild strawberry within the project area, although it will be potentially impacted by the beach access improvements, which are no longer part of this project. Condition 20 should be deleted.

Colors for Bridge; Colors and Materials for Trail:

Conditions 25 and 26 address the requirement that colors of the bridge and trail materials shall blend with the surrounding environment. However, the specifications for the Coast Trail Detail (Attachment C), specify Terra Cotta color for both the GravelPave2 and gravel infill. Terra Cotta (an orange-brown) is more appropriate for desert settings. It is highly desirable to use local sources of gravel (i.e., from the Pilarcitos Quarry on Highway 92 or Langley Hill Quarry on South Skyline) to reduce the carbon footprint of hauling from sources outside the County. I would suggest using Gray for the GravelPave2, which is similar in color to the light gray of local quarry product, and a darker Gray for the bridge. The darker the hue, the more it blends with the natural setting.

Noise:

Condition 22 would allow construction activities on Saturday between 9:00 and 5:00. This project will impact neighbors on both the north and south. Given that the Fitzgerald Marine Reserve has many visitors on weekends, it would be much more appropriate to allow construction only during the week in order to maintain good will with neighbors.

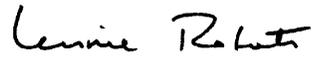
Environmental Document:

The Initial Study and Mitigated Negative Declaration for this project also evaluated a beach access improvement project at the northwest edge of Fitzgerald Marine Reserve. This beach access project is not before your Commission for approval at this time. CGF believes the beach access project needs major modifications to its design. Moreover, part of the project is below mean high tide, and therefore falls within the jurisdiction of the Coastal Commission. As such, consideration of the environmental document should wait until the CDP for the project is ready for review and approval. CGF requests that your Commission certify only the portion of the Negative Declaration applicable to the Dardenelle Trail.

In summary, CGF supports the project, and believe that the additional or changed Conditions of Approval will fully mitigate its impacts.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Lennie Roberts". The signature is written in a cursive style with a large initial "L" and a stylized "R".

Lennie Roberts, Legislative Advocate,
Committee for Green Foothills