175 Culebra Moss Beach, CA 94038 January 9, 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:

Thank you for the opportunity to comment on the proposed trail plans at Fitzgerald Marine Reserve (FMR). I am a horticulturist by profession who lives next door to Pillar Point Bluff preserve and the fresh water marsh. I'm part of the Midcoast Parks & Rec Committee Trails Team which has been working on facilitating connection of the CA Coastal Trail through the Midcoast. I also devote much volunteer time and effort on control of invasive non-native weeds on Pillar Point Bluff.

There are extensive and rapidly expanding areas of invasive non-native <u>cape ivy</u> in the area proposed for these trail improvements. Cape ivy spreads and climbs vigorously over all other vegetation blanketing out the light. It is extremely difficult to control because it can regrow from each segment of stem or root. Cleared vines must be carefully bagged and removed and any resprouts carefully watched for and if possible treated with herbicide to kill the roots.

Planned project mitigation measures call for vegetation clearing with weed whackers and retaining all vegetation on site bundled into piles at various locations. If the existing vines of cape ivy are treated this way, segments of the plant will survive and resprout everywhere it is moved.

Planned project grading includes hundreds of cubic yards of cut and fill. Soil containing countless viable root segments of cape ivy will be spread all over the project area. It is a common unfortunate side effect of any kind of soil disturbance to turn up new weed seeds, but it would be unconscionable to cut-and-fill and otherwise move soil around that is infested with cape ivy.

A condition of approval should be added requiring state-of-the-art management of cape ivy infested areas. The county agriculture department should be consulted in this regard. Best management practice should be to <u>avoid moving soil infested with cape ivy roots into</u> <u>uninfested areas</u>.

While I appreciate the reduction in the previously proposed width of the trail and bridge and use of more natural surface, I still wonder why our Coastal Trail, winding through beautiful natural areas of the marine reserve, must be sized for road vehicles. Rather than have bulldozers over-excavate the trail, destroying tree roots which extend far beyond the canopy of trees, more care should be taken to adjust the trail grade for accessibility by adding fill over roots and low areas. The narrower sections of the existing trail could be carefully widened to 6 or 8 feet in the same manner. This type of careful non-invasive trail improvement would greatly reduce the need for extensive weed control follow-up caused by major soil disturbance and would preserve the sensitive habitat and natural experience of the existing trail. Is there an adequate budget for the years of follow-up weed control necessitated by all this soil disturbance?

Sincerely,

Lisa Ketcham