

175 Culebra
Moss Beach, CA 94038
July 20, 2010

Mike Schaller, Project Planner
San Mateo County Planning and Building Department
455 County Center, Second Floor
Redwood City, CA 94063

Re: Initial Study and Negative Declaration for PLN 2010-00093: Fitzgerald Marine Reserve/Preserve beach access improvements at Nevada and North Lake Street and improvements to the Dardenelle Trail/California Coastal Trail between North Lake Street and Cypress Avenue

Dear Mr. Schaller:

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.

The top priority goal of the FMR Master Plan is to preserve and enhance natural resources.

Beach Access Trail: I'm a bit confused between the lengthy discussion in the FMR Master Plan about the degradation of the reef from overuse, the need to restrict use, and this new beach access plan which is basically a short but wide asphalt boulevard to the reef replacing a beautiful natural area with black road paving and retaining walls as high as tall people, with the one benefit that wheel chair access will be extended from the upper viewing level (which already has quite a good view) to the lower level (but still not to the beach).

Wheel-chair access requires a sufficiently firm surface, not necessarily paving, and a minimum trail width of 3 feet. Surely if it is deemed necessary to have the lower viewing level handicap accessible it could be done with a much narrower path which would thus allow much lower retaining walls and hopefully avoid destruction of the existing California wild strawberry which LCP Policy 7.49 protects. Bicycles, joggers, and horses are not an issue here. The trail width only needs to accommodate pedestrians and an occasional wheel chair, just for a short distance as a more-or-less dead-end trail. People don't need to walk 3 or 4 abreast in each direction if space is constrained by the slope of the land.

Imagine the change in appearance of this natural area as you look back up the hill from the beach and see nothing but rip rap, paving and retaining walls winding up the hill (all in such a precarious position exposed to creek flooding, storm surf, and sea level rise). This paved urban landscape does not appear to comply with LCP Policy 8.5 which requires that new development preserve the area's visual and open space qualities. I can't help but imagine what great nature enhancement could be achieved by instead directing these considerable financial resources toward a restoration of the riparian habitat of San Vicente Creek.

San Vicente Creek Bridge: A new longer bridge eliminating the steep drop at either end will be a great improvement since this is the only access across San Vicente Creek west of Hwy 1. I think it is a mistake for the bridge to be sized for road vehicles. This seems contrary to the goals of the FMR Master Plan and the California Coastal Trail. I don't understand the need to move the bridge location upstream as that seems to cause more impact on sensitive biological and archeological resources.

CA Coastal Trail segment/ Dardenelle Trail: The existing trail has a firm natural surface, marred only by some areas of exposed roots in the mid and northern sections. It winds appealingly through a secluded wooded area with the mystery of what is around the next bend drawing travelers along. The mid section particularly is surrounded by swaths of native ferns and rushes. There is a nearby pond with lots of bird activity.

Areas with exposed roots could be overlaid with packed native soil (mixed with aggregate if necessary). The narrower sections could be carefully widened to 6 or 8 feet in the same manner, and/or viewing/resting areas could be created on the side. This type of careful non-invasive trail improvement would preserve the sensitive habitat and natural experience of the existing trail. To clear a wide swath (14 feet plus construction/grading space) to put in an asphalt road would damage this environment and destroy the precious experience that we now enjoy along this trail.

Invasive non-native weeds: While San Vicente Creek has a long-standing problem with invasives including cape ivy, there are also several areas along the Dardenelle Trail where cape ivy has become established. While it is a common unfortunate side effect of any kind of soil disturbance to turn up new weed seeds, it would be unconscionable to cut-and-fill and otherwise move soil around that is infested with cape ivy which can regrow from each piece of stem or root. These stands should be removed and time allowed for resprouts to be treated long before any trail work is begun. If there is no follow-up program of weed control in the years following trail work, the habitat will be degraded even further.

The Natural Resource Management Program of the FMR Master Plan, Policy 8, calls for a Vegetation Management Program to restore and protect native plant communities, and to remove non-native vegetation from creek, marsh and upland areas. The field surveys conducted in 1997 mapped a few discrete areas of cape ivy in Pillar Point fresh water marsh which since that time have overrun the fresh water marsh and spread into the salt marsh. As a mitigation for this project, I suggest that a condition be added to remove this highly invasive species from the project area. It would be a far better use of scarce funds to combine removal of invasives and restoration with appropriate natives with a scaled back trail and access project.

Sincerely,

Lisa Ketcham