

Stuart B. Weiss, Ph.D.
27 Bishop Lane
Menlo Park, CA

October 26, 2016

Dave Holbrook, Senior Planner
San Mateo County Planning
455 County Center, 2nd Floor
Redwood City, CA 94063

Re: Revised Application for proposed development on five lots at Vallemar Bluffs property, Vallemar and Juliana, Moss Beach, PLN2015-00380

Dear Mr. Holbrook,

I am writing this letter to comment on the revised plans for the Vallemar Bluffs property, focused on impacts on Coastal prairie and rare species, primarily from development of Lot D. My professional area of expertise is grassland conservation and restoration (including numerous listed species), and I have worked in many sites in San Mateo County. I have reviewed various biological surveys including the detailed botanical observations by Toni Corelli, and her petition to list the Coast Yellow Leptosiphon (*Leptosiphon croceous*) under the California Endangered Species Act.

The development of Lot D would have significant unavoidable effects on coastal prairie habitat and rare species on the site. This site is the only known occurrence of Coast Yellow Leptosiphon, and supports three other rare species (*Castilleja ambigua ssp. ambigua*, *Hosackia gracilis*, and *Agrostis blasdalei*). The maximum amount of prairie habitat on the site needs to be conserved and managed over the long-term. Lot D development would immediately reduce the area of prairie, which is already critically small. Buffers of 500' around plant taxa are recommended under USFWS Recovery Plans, such as the 1998 USFWS Recovery Plan for Serpentine Soil Species of the San Francisco Bay Area. Bluff/cliff retreat under sea level rise over the next 100 years (Coastal Commission guidance) will further reduce the prairie habitat. Providing room for retreat is critical for the prairie.

Developing Coastal prairie would violate the San Mateo County LCP. Coast Yellow Leptosiphon will likely be listed under the California Endangered Species Act, and petitioned for Federal listing. These biological issues will largely be resolved if Parcel D remains undeveloped – the remaining parcels occupy non-grassland habitat like Monterey cypress forest.

Providing for long-term management of the prairie is essential as well, even in the absence of development on Lot D. The undeveloped parcels should be transferred to San Mateo County Parks, along with a management endowment paid for by the applicant, so that the prairie and rare plants can be appropriately managed along with recreation.

Thank you for your consideration,



Stuart B. Weiss, Ph.D.