

Midcoast Community Council

An elected Advisory Council to the San Mateo County Board of Supervisors
representing Montara, Moss Beach, El Granada, Princeton, and Miramar
P.O. Box 248, Moss Beach, CA 94038-0248 - www.MidcoastCommunityCouncil.org

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Date: November 9, 2017
To: Ruemel Panglao, SMC Project Planner
Cc: Renée Ananda, CCC Coastal Program Analyst
From: Midcoast Community Council/ Lisa Ketcham, Chair
Subject: **PG&E Major Tree/Shrub Removal Project along south side of Hwy 92 for gas line maintenance, PLN2017-00422**

MCC reviewed this application at our 11/8/17 meeting and submits the following comments:

Incomplete and conflicting information

We note that PG&E Utility Standard 4490S provides for exemptions for environmentally sensitive areas. In addition, *“Integrity management personnel may elect to exempt specific trees or woody vegetation for removal from the border zone” (Section 6.1).*

The application lacks information on location of specific tree species in relation to the gas line and the creek, making it impossible to comment on which trees or shrubs should be considered for exemption. Locally native and significant trees proposed for removal should be clearly marked so the public can become aware of the plans and comment. Conflicting information in the various parts of the application needs to be clarified, such as removal methods and whether herbicide will be used.

Creek bank stability

Creek banks should be exempt from clearing of native vegetation in order to protect slope stability and prevent erosion and sedimentation. The CDP water quality discussion does not consider eroding creek banks due to steep denuded slopes and rapid stormwater flow. Creek width and depth was reported for only one date, almost two years ago, with no discussion of historical flows, the dam upstream, or future predictions with climate change.

Nesting birds and endangered species

It is unrealistic to rely on a nesting bird survey for such a massive tree/brush removal project, or to expect that the presence of a biologist onsite will result in no take of endangered species. The work should be scheduled during Aug/Sept, after bird nesting season and before winter rains.

Invasive weeds

CDP application form #4 checked yes for “pampas grass, invasive brooms or weedy thistle”, but there is no mention of this in the supporting discussion. Vegetation clearing favors the spread and establishment of invasive weeds even if they are not already present. Follow-up mitigation should be required.

Visual resources

The CDP aesthetics discussion determined “no impact.” There was no mention that this section of Hwy 92 is a County-designated scenic corridor, to be enjoyed while traveling the roadway, without need for vista areas to stop and observe the surrounding area.

Thank you for the opportunity to comment.