

CCC Comments PLN2019-00060

From: Martinez, Erik@Coastal [<mailto:erik.martinez@coastal.ca.gov>]

Sent: Friday, May 24, 2019 4:59 PM

To: Ruemel Panglao <rpanglao@smcgov.org>

Cc: Camille Leung <cleung@smcgov.org>

Subject: RE: Referral for New SFD and ADU on Hermosa, Miramar (PLN2019-00060)

Hi Ruemel,

Thank you for providing us the opportunity to comment on the proposed construction of a single family dwelling and accessory dwelling unit on Hermosa Avenue, Miramar (PLN2109-00060). Staff has just a few thoughts on this referral that we'd like for the County to consider.

Sensitive Habitat - Per Local Coastal Program (LCP) Policy 7.1, the willow thicket is considered sensitive habitat since it is a riparian corridor and has the potential to support "rare and endangered" species such as the California Red-Legged Frog (CRLF) and the San Francisco Garter Snake (SFGS). The Biological Impact Assessment states that the site was surveyed for biological resources on January 24, 2018. The CRLF breeding season is from November to April and they usually disperse during the summer. Due to the high mobility of the species and the possibility for the CRLF to occur on/move through the property, we recommend that the County require the applicant to conduct the biological survey during the breeding/dispersal season. Similarly, the SFGS tends to occupy similar spaces as the CRLF and has been recorded within a 2 mile radius of the project location and therefore, could potentially move through the site as well. Based on the follow up sensitive species survey, we recommend that the County require adequate habitat buffers and mitigation measures to avoid, minimize, and mitigate any impacts on the riparian habitat and affected sensitive species.

Additionally, the Biological Impact Assessment refers to the site as an ephemeral drainage site with no defined channel. However, based on our review, the project area meets the criteria for a riparian corridor as defined in LCP Policy 7.7 and 7.11(a). The LUP defines riparian corridors by the "limit of riparian vegetation" so long as the corridor contains at least 50% cover of listed plants which include the arroyo willow. As stated in the BIA, the willow thicket comprises approximately 75% of the project site. To ensure consistency with the LCP, we recommend that at a minimum, the applicant use the 30 foot buffer for intermittent streams from the limit of the riparian vegetation. A larger buffer may be necessary depending on the results of the above recommended survey.

Impervious Surface Areas – Per LCP Section 6300.9.11.70 of the Implementation Plan (IP), the allowable impervious surface area (not including the proposed residence) is 10% of the parcel size not to exceed 1,170 square feet. The applicant is proposing 1,424 square feet. Please ensure that applicant follows the required standards.

Vegetation – Please provide a project plan that shows the willow thicket and any required buffers in relation to the proposed development. As stated in Section 6565.20 (C) of the Design Review District, new houses, additions and accessory structures should be located, designed and constructed to retain and blend with the natural vegetation and natural landforms of the site.

Wetland Delineation – The biological impact assessment states that a wetland is defined by using a three-parameter wetland delineation. While that is correct for the U.S. Army Corps of Engineers, the Coastal Commission relies on a one-parameter wetland definition. If there are potential wetlands present on the property not associated with the ephemeral stream and riparian corridor discussed above, we recommend that the County require the Applicant to conduct a one-parameter wetland delineation to more accurately delineate the extent of wetlands on the property.

Please let me know if you have any further questions.

-Erik
415-904-5502