



Ruemel Panglao
Project Planner
455 County Center, 2nd Floor
Redwood City, CA 94063

June 10, 2019

Re: PLN 2019-00060 (Kerry Burke, Applicant, Randy Ralston, Owner)

Dear Ruemel,

On behalf of Committee for Green Foothills (CGF), I write to call your attention to the following issues regarding the proposed development of a single family residence, garage, and ADU, located on Hermosa Avenue, Miramar.

This letter supplements my June 7 email regarding the requirement for a Coastal Development Permit for this project.

CGF believes that a Coastal Development Permit and an IS/MND are required for this project as there will likely be significant adverse impacts to the arroyo willow (*Salix lasiolepis*) forest, an Environmentally Sensitive Habitat Area under the San Mateo County Local Coastal Program.

Approximately one-half of the proposed residence, as well as the entire driveway, would be located within the mapped arroyo willow forest. Arroyo willow is a riparian species, and also is commonly found in wetlands. The US Fish and Wildlife Service Wetlands Inventory (1996 national list) recognizes *Salix lasiolepis* as a FACW species. The Biological Impact Assessment by Coast Ridge Ecology improperly dismissed the “willow thicket” as not qualifying as a sensitive habitat under the LCP.

Specifically, the project, as currently proposed, is inconsistent with the following San Mateo County Local Coastal Program (LCP) policies:

LCP Policy 7.1 provides for the protection of sensitive habitats including all perennial and intermittent streams and their tributaries. The intermittent stream or “ephemeral drainage” (as described by Coast Ridge Ecology) on the subject property qualifies as a sensitive habitat.

LCP Policy 7.3 prohibits any development or land use that would have a significant adverse impact on sensitive habitat areas and requires development adjacent to sensitive habitats to be sited and designed to prevent impacts that could significantly degrade sensitive habitats, and further specifies that all uses shall be compatible with the maintenance of biologic productivity of the habitats..

LCP Policies 7.7-7.13 provide for the protection of riparian corridors adjacent to intermittent streams and their buffer zones.

LCP Policies 7.14-7.19 provide for the protection of wetlands and their buffer zones.

The subject property is approximately 20,000 sq ft, of which approximately 15,000 sq ft is covered by arroyo willow (*Salix lasiolepis*) forest. The arroyo willow forest is a protected sensitive habitat under the LCP, and new development must be set back 30 feet from the outer limit of riparian vegetation for intermittent streams, and 50 feet from wetlands.

CGF disagrees with the conclusion in the Coast Ridge Ecology BIA that the “drainage feature” is not an intermittent stream due to lack of a defined channel. At a site visit yesterday, I noted that at the upper end of the stream on the property, adjacent to Hermosa, there is a low bank that defines the channel, but further downstream, due to vegetative cover, and lack of access to the site, one can’t determine whether this streambank is continuous. There is typical depositional material (sand, silt, mud) that indicates fluvial (stream) presence, however. Small streams and their tributaries often have areas where the streambed has aggraded, no channel bank is evident, and stormwater spreads out over a larger area. Neighbors have documented photos of flooding outside of the channel on Hermosa and adjacent properties during high rainfall events.

The project plans, as submitted, indicate that the driveway and at least 50% of the proposed 3975 sq. ft. single family residence are impermissibly located within the arroyo willow forest.

Accordingly, CGF objects to the location of the proposed residence, and requests that the project be redesigned. The residence must be relocated outside the willow thicket and its buffer zone. According to Coast Ridge Ecology’s Biological Impact Assessment (BIA), approximately 5,000 sq. ft. of the subject property is ruderal/grassland. This grassland area is a feasible alternative site for the single family residence. In order to fully comply with the cited LCP sensitive habitat policies, the size of the residence may need to be reduced, and the residence redesigned. The proposed driveway should also be relocated in order to avoid impacts to the willow thicket.

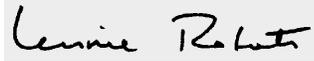
In addition to relocation/redesign of the residence, a special condition of approval should be included that requires the property owner/applicant/contractor to submit for County approval a protection plan that fully protects the willow thicket and its buffer. Landscaping within the buffer shall be limited to native species compatible with riparian areas appropriate to this area of the California coast. Regular removal of exotic invasives, such as cape ivy, should also be required.

For a recent example of conditions of approval that were revised by County Planning per an Appeal by CGF in order to comply with riparian protections and 30-foot buffer zone setbacks, please refer to the Revised Letter of Decision dated March 8, 2017, for PLN2016-00014, for a single family residence on Miramar Drive, Miramar notably Conditions 7, 14, and 22.

We have other examples of county approvals of projects that have been required to fully protect riparian areas that are not immediately adjacent to perennial or intermittent streams, if you would like to have those as well.

Thank you for your attention to these concerns.

Sincerely,

A handwritten signature in black ink on a light gray rectangular background. The signature reads "Lennie Roberts" in a cursive, slightly slanted script.

Lennie Roberts, San Mateo County Legislative Advocate

cc: Mike Ferreira, Coastal Issues Committee, Sierra Club
Ken King, Coastal Issues Committee, Sierra Club
Lisa Ryan