

Mendocino County

JUL 06 2021

Planning & Building Services



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July 6, 2021

Tara Jackson, Planner
Wynn Coastal Planning & Biology
703 N Main Street
Fort Bragg, CA 95437

RE: Mendocino Commentary CDP_2020-0024 (Boothe)
34350 Pacific Reefs Road
Albion, CA 95410
APN 123-340-13-00

Dear Tara,

Wynn Coastal Planning & Biology (WCPB) received commentary from the California Coastal Commission regarding the Boothe's Coastal Development Permit (CDP) Application. The CCC email is written by Supervising Analyst Melissa Kraemer and is dated June 17, 2021. The purpose of this response letter is to address requests in Ms. Kraemer's commentary regarding minimum monitoring requirements and success criteria for the headland wallflower MMRP recommended within Wynn Coastal Planning and Biology's biological report included as part of the CDP application.

I have reviewed Ms. Kraemer's recommendations as well as recommendations made earlier by CDFW Environmental Scientist Rhiannon Korhummel and propose the following changes to the Mitigation Measures section of the biological report regarding headland wallflower:

7.8 Potential Impact to Headland Wallflower

The majority of headland wallflowers in the study area were within the northern coastal bluff scrub habitat at the bluff edge or along the bluff slope. Potential impact to headland wallflowers within northern coastal bluff scrub habitat can be avoided by following the mitigations recommended for that natural community in 7.6. Two headland wallflowers were observed within the area where the single family residence and septic leach fields are proposed and three others were present just north of the proposed single family residence. These five plants may be directly impacted by construction and should be avoided or compensated for with the measures below. In addition to direct impact to individual plants the total overall suitable habitat for this species will be reduced by construction of the house and the associated curtilage. ~~A Mitigation Monitoring & Reporting Plan is recommended.~~

7.8.1 Compensatory Measure: Removal of invasive iceplant to expand and enhance headland wallflower habitat on site

Headland wallflower is precluded from growing within an approximately 2000sqft portion of the subject parcel by heavy mats of invasive iceplant. This area, which is at the break in slope of the bluff edge, is an ideal topographic location for headland wallflower based on Mr. Spade's experience observing the habits of this species. Iceplant shall be removed by pulling by hand and/or killed by direct application of herbicide. Special care shall be taken to avoid overspray and chemical drift into areas vegetated with native plants. This method has successfully been used by California State Parks to restore wallflower (*Erysimum* spp.) habitat. Relative cover of native species present within the area of iceplant is high. If herbicide is to be used, specifications on applications should be provided to and approved by the County before application. Compensatory mitigation success should include full eradication of iceplant above the break in slope of the headlands (i.e. not along the bluff face) as a goal.

7.8.2 Avoidance and Minimization Measure: Permanent symbolic fencing along the bluff edge

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A low wooden or rope fence shall be installed, set back roughly 45 46ft, along paralleling the bluff edge to denote sensitive natural habitat to its north and to discourage entry into this area. This location for the fence is consistent with the geotechnical setback as reported by Brunsing and Associates, Inc. approximately the edge of the extent of the iceplant infestation at the time of the biological surveys, which will be converted to native habitat supporting headland wallflower. The area north of the permanent symbolic fence shall be maintained as native habitat.

7.8.3 Avoidance and Compensation Measure: Seed collection and dispersal

Five headland wallflowers are located outside of the Northern coastal bluff scrub habitat and may be directly impacted by construction of the proposed single-family residence and septic system. Headland wallflowers are biennial or short-lived perennial plants that grow vegetatively the first year, go dormant during winter and then regrow and go to seed the following year (and sometimes survive to seed again an additional year or two). Headland wallflowers have a deep taproot and are unlikely to be successfully transplanted unless very young, so transplanting is not recommended. Seeds will be collected from individuals prior to construction and dispersed north of the single-family residence within an area vegetated with ice plant at the time of the biological surveys. The iceplant in this area will be removed prior to seeding creating new habitat for the headland wallflowers along the bluff edge as per the measure in Section 7.8.1 above. Collection of soil around the headland wallflowers within the impact area should be considered to capture any potential seed bank which may be present. Caution should be used with soil/seed bank collected because the five wallflowers observed within the potential direct impact area are growing within habitat dominated by invasive grassland species while the restoration area, though dominated by iceplant, also has a significant component of native species and lacks many of the non-native invasive species present within the grassland. Consideration should be given to either spreading seedbank soil within the area between the project and restoration area that already has non-native grassland species present but that will be protected by exclusionary symbolic fencing, and/or germinating seed bank soils in flats, removing non-native species as they germinate and then planting out germinating wallflowers into the restoration area.

7.8.4 Compensatory Measure: Habitat Mitigation Monitoring & Reporting Plan

A Habitat Mitigation Monitoring and Reporting Plan (HMMRP) will be prepared and submitted to Mendocino County Planning and Building for review and approval prior to permit issuance. The purpose of the HMMRP is to direct and monitor the success of iceplant removal and the reseeding efforts in the area where ice plant will be removed to mitigate for the direct wallflower impacts and the reduced ESHA buffer. Mitigation and Monitoring will be carried out by a qualified botanist. Minimum success criteria specified in the HMMRP will include:

100% of iceplant will be eradicated within the restoration area of the subject parcel above the break in slope of the bluff edge. At least ten wallflower individuals will be successfully grown in the reseeded/restored area (this number is twice the number as the number of plants documented within the area likely to be impacted by the proposed project). The Monitoring and restoration should occur for at least five years and until all performance criteria are met for 2 consecutive years. Results of ice plant removal and annual monitoring will be reported to the County annually for a minimum of five years and for each additional year monitoring and restoration efforts continue.

The HMMRP will include background information, goals, success criteria, methodology, and a timeline for implementation. The HMMRP will be performance-based, allowing for management to be carried out in an adaptive manner whereby monitoring provides feedback and shows the manager areas within which efforts are successful, as well as areas that may need a different approach in order to meet the performance goals. The HMMRP will address and identify potential contingency measures if no headland wallflower individuals germinate. Consultation with CDFW and the County should occur if progress toward meeting success criteria is not being made in order to reassess strategies toward achieving the criteria. If success criteria are not met after five years and at least two consecutive years then an additional year (or more) of management, restoration, monitoring, and reporting will be required.

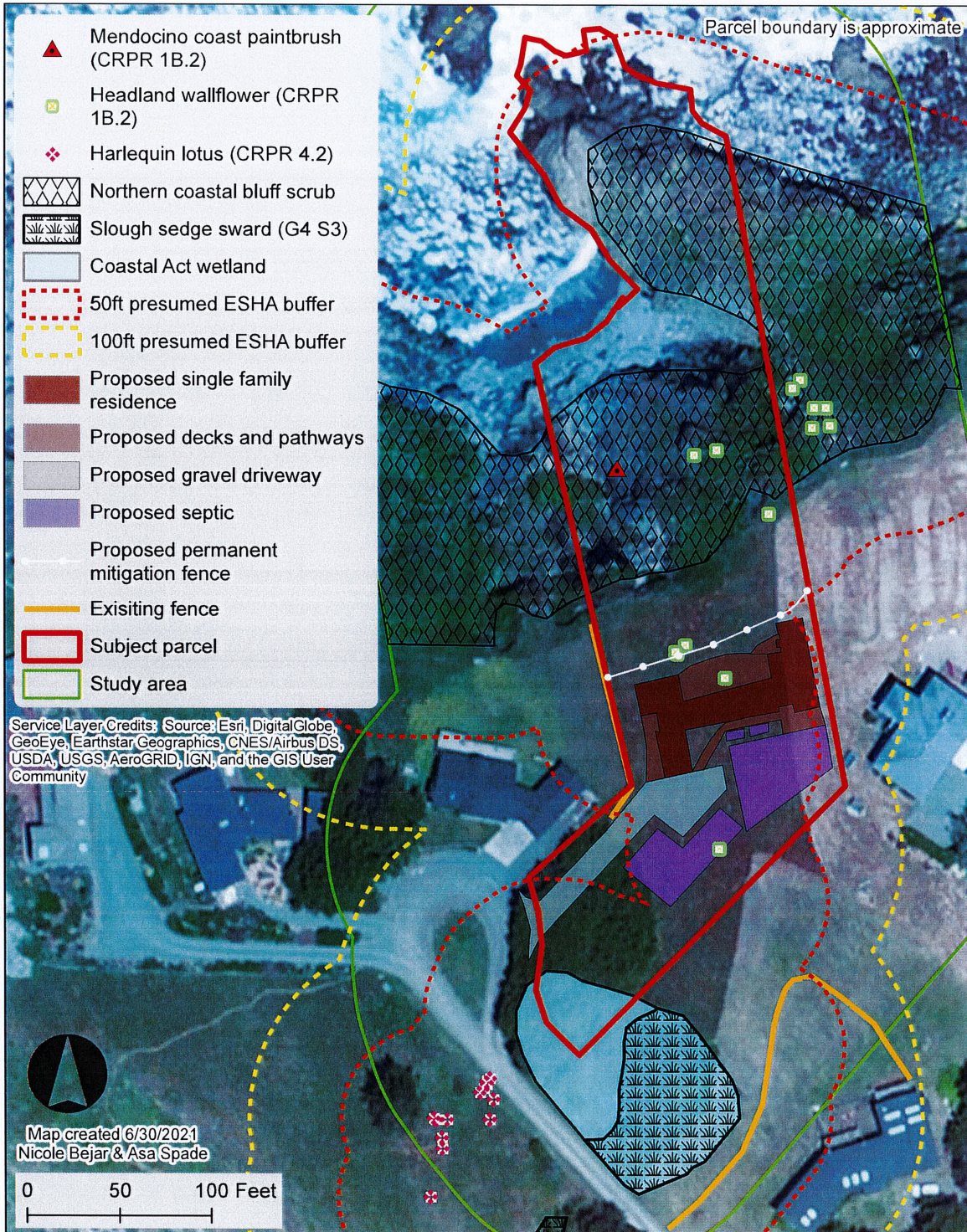
A new version of the Presumed ESHA Map with Proposed Development (Figure 2 of the biological report) depicting the exclusionary fencing at 46ft from the bluff top, rather than the 15ft originally specified, is attached below. I hope this addresses all changes recommended by the Coastal Commission. Please let me know if you have additional questions.

Sincerely,

Asa Spade

A handwritten signature in black ink, appearing to read 'Asa Spade', written in a cursive style.

Senior Biologist
Wynn Coastal Planning & Biology



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Presumed ESHA Map with Proposed Development

Figure 2. Potential Environmental Sensitive Habitat Areas (ESHAs) identified in the study area and their recommended buffers.