green foothills

February 11, 2025

Camille Leung, Project Planner
San Mateo County Planning
455 County Center, Second Floor
Redwood City, CA 95063

Re: PLN2021-00478: Applicant/Owner: Elizabeth Lacasia, Address: 779 San Carlos Avenue, El Granada, APN: 047-105-020. Coastside Design Review Permit, Coastal Development Permit (CDP), and Variance for construction of a new 1,670 sq. ft. three-story single-family residence with an attached 371 sq. ft. garage and a 791 sq. ft. Accessory Dwelling Unit (ADU) on a legal 7,070 sq. ft. parcel associated with a hearing-level CDP and Variance. The Variance is being sought to allow a reduced front yard setback of 3 feet where 20 feet is the minimum allowed due to the site's location within a portion of the Montecito Riparian Corridor and associated 30-foot riparian setback. A wetland analysis has determined that there are no wetlands on the property. The Planning Commission will make a decision on the IS/MND, DR, CDP, and Variance at a public hearing at a later date. Application Deemed Complete: November 13, 2024. APN 047-105-020. The project is appealable to the California Coastal Commission.

Dear Camille,

On behalf of Green Foothills, I write to object to the above-referenced project for the following reasons:

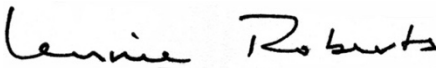
1. The Project Description has been revised and now states: "A wetland analysis has determined that there are no wetlands on the property." We object to this conclusion, as the SMC Local Coastal Program (LCP) Policy 7.14 Definition of Wetlands is out of date, and inadequate, and should be updated consistent with the Coastal Act and Coastal Commission Guidance. More specifically, LCP Policy 7.14 states (in relevant part): "…In San Mateo County, wetlands typically contain the following plants…" and includes a list of 12 wetland species found in either salt or fresh water marshes. The intent of the County to include typical plants in this policy when it was written in 1981 was to provide a few examples, and not to rule out all other wetland species that were not included, as that list would have been exceedingly long. I can attest to this info with some authority as I attended each of the 40 workshops and public hearings for the County's LCP. Moreover, as a California Coastal Commission member, I voted to certify the County's LCP. I would not done so if I had thought that including "typical wetland plants" in this policy would later be interpreted by applicants (and their paid consultants) to mean excluding all other wetland species found in the County's Coastal Zone. County Botanist Roman Gankin developed this policy and was quite clear at the time this was a list of a few examples, and not an exhaustive list.
2. The Arroyo Willow, documented on the subject parcel, is both a riparian and wetland species. Toni Corelli, botanist and author: https://scholar.google.com/citations?user=0DHPbukAAAAJ&hl=en

has identified 250 wetland plants found on the San Mateo County coastside, see: https://www.youtube.com/watch?v=FWGmng8B29o
At 13:33 is the description of Salix lasiolepis, Arroyo Willow — the most common willow along the San Mateo Coast. Ms. Corelli states that it is found in both riparian and wetland habitats.

3. In October, 2004, a Riparian Delineation was prepared by Mr. Tom Mahony, Plant Ecologist, Albion Environmental, Inc. for Mr. Robert Ray, the former owner of the subject parcel. Mr. Mahony's Report states (in relevant part): "…riparian woodland composed of the Arroyo Willow series occurs along the western half of the property." Also, "…the riparian area is structurally mature, and forms an intact canopy extending from the Project Area down to the unnamed drainage channel to the west…". Mr. Mahony further lists 11 native plant species found in the Arroyo Willow understory: "…including spreading rush (Juncus patens), a facultative wetland species 4, and slough sedge (Carex obnuta), an obligate wetland indicator species…".
4. Robert Perrera, Environmental Regulatory Consultant, Huffman-Broadway Group, Inc., in an Aquatic Resource Delineation (ARD) Letter Report dated October 18, 2024 to Mrs. Lacasia, owner of subject property, states (in relevant part): "…The wetland delineation findings presented in Section 5 were based on the San Mateo County Local Coastal Program definition of wetlands as provided in Policy 7.14 Definition of Wetlands", and further concludes: "the Review Area does not support wetlands as defined by the San Mateo County LCP…" Mr. Perrera's ARD describes the portion of the property that is "within the riparian zone," including: "…there was one individual sedge found that is likely tall flatsedge (Cyperus eragrostis (FACW) and two individual horsetail plants which are likely tall scouring rush (Equisetum hyemale (FACW). Despite the timing of this survey (October 4, 2024 after a long dry summer period), it's clear that some wetland plants continue to be found in the western, relatively level, area of the subject property, and wetland setbacks/buffer zones from this wetland area are applicable. The survey for wetland plants should be done during the winter-spring rainy season instead of during October.
5. Arroyo Willows have been documented on otherwise steep, dry hillsides along the San Mateo coast, likely supported by seeps and springs. One notable example is at the Pilarcitos Quarry, where the Vegetation Map for the Quarry's Mining and Reclamation Plan depicts a dozen or more "Arroyo Willow Thickets" on steep hillsides; accompanying text (page 21: "Biological Resources, Section 3.11.2 Vegetation") states (in relevant part): "Thickets of willows also occur frequently on steep hill slopes where seeps and springs may occur". See: Pilarcitos Quarry – Area H Mining and Reclamation Plan Revised December 2010, prepared by LSA Associates.
6. Wetland Buffer Zones (per LCP Policies 7.18 and 7.19) are required to be a minimum of 100 feet landward from the outermost line of wetland vegetation. This setback may be reduced to no less than 50 feet only where (1) no alternative development site or design is possible, and (2) adequacy of the alternative setback to protect wetland resources is conclusively demonstrated by a professional biologist to the satisfaction of the County and the State Department of Fish and Game (now California Department of Fish and Wildlife). Residential uses are not permitted within setbacks/buffer zones. The proposed single-family residence and ADU do not meet these minimum setbacks.

Green Foothills requests that the proposed project be revised to comply with the required 50- foot minimum wetland setback, consistent with the Coastal Act and LCP, to the maximum extent possible, taking into account the investment-based expectations of the Owner/Applicant. The overall square footage of the project now is 2,832 sq. ft. — which is a slight reduction from the previous 2,984 sq. ft. — but is still considerably larger than other homes in the neighborhood.

Sincerely,



Lennie Roberts, Legislative Advocate, Green Foothills

Attachments: Mahony Bio Report: PLN2004-00398
Figure 5, Pilarcitos Quarry Proposed Expansion Area 2: Wetlands and Riparian Areas, December, 2010

cc: Luis Topete, Design Review Officer, San Mateo County Planning
Isobel Cooper, Coastal Planner, California Coastal Commission
Stephanie Rexing, North Central Coast District Manager
Alice Kaufman, Policy and Advocacy Director, Green Foothills
Alexandra Mendoza, Environmental Associate, Green Foothills
Other Interested Parties

ALBION ENVIRONMENTAL, INC.
NATURAL AND CULTURAL RESOURCES CONSULTANTS

1414 SOQUEL AVENUE, SUITE 205
SANTA CRUZ, CALIFORNIA 95062

TELEPHONE (831) 469-9128
FACSIMILE (831) 469-9137

October 15, 2004

Mr. Robert Ray
526 High Grove Ave.
Goleta, CA 93117

Re: Riparian Delineation on San Carlos Avenue Parcel (APN 047-105-020), El Granada

Dear Mr. Ray:

On July 27, 2004, I conducted a riparian corridor delineation on the property located at the northwestern end of San Carlos Avenue in El Granada, San Mateo County, California (APN 047-105-020) ("Project Area"). I conducted an additional site visit on September 17, 2004, where I met with you and land surveyor Mike Turnrose to flag the riparian corridor in order to have it surveyed. The riparian delineation followed definitions outlined in Section 7.7 of the San Mateo County Local Coastal Program (LCP), which states, in part:

"Define riparian corridors by the "limit of riparian vegetation", (i.e. a line determined by the association of plant and animal species normally found near streams, lakes, and other bodies of freshwater: red alder, jaumea, pickleweed, big leaf maple, narrow leaf cattail, arroyo willow, broadleaf cattail, horsetail, creek dogwood, black cottonwood, and box elder). Such a corridor must contain at least 50 % cover of some combination of the plants listed".

Biological issues addressed in this report are limited to the riparian corridor. The report format follows the Biological Impact Form guidelines for compliance with San Mateo County Local Coastal Program Policy 7.5.

Applicant

Mr. Robert Ray
526 High Grove Ave.
Goleta, CA 93117
(805) 705-6686

Project Location

The project is located in the southwestern corner of the Montara Mountain USGS 7.5' quadrangle. The Assessor's Parcel Number is 047-105-020.

Principal Investigator

Tom Mahony, M.S.
Plant Ecologist
Albion Environmental, Inc.
1414 Soquel Ave., Suite 205
Santa Cruz, CA 95062
(831) 469-1775 (phone)

(831) 469- 9137 (fax)
tmahony@albionenvironmental.com

Project and Property Description

The Project Area for this riparian delineation is located at the northwestern end of San Carlos Avenue in El Granada, San Mateo County (Appendix A). The Project Area is currently undeveloped and is located in an existing residential community. The Project Area occurs at approximately 125 feet elevation (NGVD 1929), and is moderately sloped to the southwest. An unnamed intermittent drainage channel flows generally southbound, west of the Project Area. A riparian corridor associated with the drainage extends onto the Project Area.

The Project Area was likely composed, originally, of two plant communities: coastal scrub and riparian woodland. However, prior to the site visit (apparently in June 2004), most of the Project Area was cleared of vegetation. Virtually all of the coastal scrub, and some of the riparian woodland, was removed.

Based on remnant vegetation observed on the Project Area, coastal scrub, likely composed of the Coyote brush series (Sawyer and Keeler-Wolf 1995) covered most of the eastern half of the Project Area prior to vegetation clearing. Dominant species still present in uncleared and resprouting areas of coastal scrub are primarily common, native shrubs and herbs including coyote brush (*Baccharis pilularis*), poison oak (*Toxicodendron diversilobum*), California blackberry (*Rubus ursinus*), cow parsnip (*Heracleum lanatum*), California figwort (*Scrophularia californica*), as well as occasional non-native shrubs and herbs including pampas grass (*Cortaderia jubata*), French broom (*Genista monspessulana*), iceplant (*Carpobrotus* sp.), poison hemlock (*Conium maculatum*), black mustard (*Brassica nigra*), wild oat (*Avena* sp.), and cotoneaster (*Cotoneaster* sp.).

Riparian woodland, composed of the Arroyo willow series (Sawyer and Keeler-Wolf 1995), occurs along the western half of the Project Area. The riparian woodland is structurally mature, and forms an intact canopy extending from the Project Area down to the unnamed drainage channel to the west. Arroyo willow (*Salix lasiolepis*) is the dominant canopy species, with occasional Monterey pine (*Pinus radiata*). A diverse shrub and herb understory is present, composed primarily of native species such as coyote brush, California blackberry, poison oak, creek dogwood (*Cornus sericea* ssp. *occidentalis*), red flowering currant (*Ribes sanguineum* var. *glutinosum*), spreading rush (*Juncus patens*), twinberry (*Lonicera involucrata* var. *ledebourii*), swordfern (*Polystichum munitum*), stinging nettle (*Urtica dioica*), slough sedge (*Carex obnupta*), and yerba buena (*Satureja douglasii*).

Methodology

The Project Area was visited on July 27, 2004 to conduct the original riparian delineation, and again on September 17, 2004 to flag the riparian corridor. Meandering transects were walked across the property, with emphasis placed on documenting the presence and extent of the riparian corridor. Plant species and communities observed during the field visit were noted. Plant taxonomy nomenclature follows Hickman (1993). Vegetation series nomenclature follows Sawyer and Keeler-Wolf (1995). Both the existing riparian dripline and the estimated extent of riparian vegetation present prior to clearing were flagged and subsequently surveyed by Mike Turnrose of Turnrose Land Surveying.

Results

A riparian corridor occurs on the Project Area, and is depicted in the map in Appendix A. The riparian corridor qualifies as a "Sensitive Habitat" under the San Mateo County LCP. The southern portion of the riparian corridor on the Project Area has been impacted be recent vegetation clearing. The portion of the riparian corridor in the northern section of the Project Area does not appear to have been impacted by recent vegetation clearing, and therefore the riparian dripline mapped in the field accurately represents the extent of original riparian corridor. The limits of riparian corridor in the northern area was determined by: (1) an abrupt change in vegetation structure from the tree dominated riparian corridor to the shrub and herb dominated coastal scrub community; and (2) a distinct change in species composition from a nearly continuous tree canopy of arroyo willow (approximately 80 percent aereal cover) to a mixed composition of shrub and herb species such as coyote brush, pampas grass, poison hemlock, and California blackberry that lack any association with the drainage channel and are more representative of coastal scrub habitat. This methodology for determining the riparian boundary is consistent with the definition of riparian corridor described in Section 7.7 of the San Mateo County LCP.

The riparian corridor located in the southern portion of the Project Area has been impacted by recent vegetation clearing. Therefore, the riparian vegetation observed in this area during the field visits does not accurately represent the extent of the original riparian corridor. However, based on topography, vegetation pattern, and resprouting vegetation, the prior limit of riparian vegetation was estimated. Most of the vegetation clearing took place outside of the riparian corridor, or only impacted marginal riparian habitat.

Based on topography, vegetation pattern, and resprouting vegetation, there appears to be a transition from strongly riparian species in the southern portion of the Project Area to more marginal riparian habitat moving north (upslope), and then to clearly non-riparian habitat further upslope. In the southern portion of the Project Area, strongly riparian species, such as arroyo willow, are present, and concave topography and low chroma matrix soils are indicative of ponding or near surface soil saturation during the rainy season. A portion of this area was cleared, and is resprouting with arroyo willow and other woody and herbaceous species. This concave area, though partially cleared, is clearly part of the riparian corridor and is mapped as occurring within the "Edge of Existing Riparian Corridor" in Appendix A.

Upslope of this concave area, species associated with the adjacent intact riparian area were observed, including twinberry, stinging nettle, and thimbleberry (*Rubus parviflorus*). The topography was concave, but soils lacked strong hydric indicators present further downslope. Therefore, this area potentially still qualifies as riparian, but appears to be a transitional area between the well developed, willow dominated area downslope and the coastal scrub habitat upslope, composed of resprouting coyote brush, pampas grass, and poison oak. This area is delimited by the line marked "Edge of Potential Former Riparian Corridor" in Appendix A.

Recommendations

No specific development plan occurs for the Project Area. Therefore, specific impacts to the riparian corridor that may occur from any development of the Project Area can't be determined at this time. According to Section 7.12 of the San Mateo County LCP, permitted uses in riparian buffer zones include:

"(R)esidential uses on existing building sites, setback 20 feet from the limit of riparian vegetation, only if no feasible alternative exists."

Therefore, any future development of the Project Area should maintain a minimum 20 foot setback from the existing, undisturbed riparian dripline in the northern portion of the Project Area, and, if feasible, the estimated limit of riparian vegetation that was present prior to vegetation clearing in the southern portion of the Project Area (marked as "Edge of Potential Former Riparian Corridor" on the map in Appendix A). I recommend more flexibility with the 20 foot setback from the line marked "Edge of Potential Former Riparian Corridor", since (1) this line represents an estimate of former conditions, and (2) this area represents more marginal habitat compared to the contiguous, tree dominated riparian corridor to the south and west.

I anticipate that, due to resprouting vegetation and natural recruitment, the cleared portion of the riparian corridor will reestablish itself naturally. However, the pace of regeneration and the final species composition may be insufficient to replace ecological function lost as a result of riparian vegetation clearing (e.g., invasive non-native species such as pampas grass may exploit mineral soil exposed by vegetation clearing and exclude native species recruitment). Therefore, I recommend that a qualified biologist examine the Project Area after one growing season has elapsed (e.g., in late spring or early summer 2005) to determine if vegetation recovery is occurring at an acceptable rate. If vegetation recovery is acceptable, I recommend no further action. If vegetation recovery is unacceptable, as determined by the qualified biologist, a revegetation plan (including recommendations for native species plantings, invasive species removal, etc.) should be prepared by the qualified biologist and included as part of an approved building plan for the Project Area.

Sincerely,

Tom Mahony
Plant Ecologist

cc: China Osborn, San Mateo County Planning Division
Mail Drop 5500, 590 Hamiliton Street
Redwood City, CA 94063

References

Hickman, J.C. (ed.). 1993. The Jepson manual: higher plants of California. University of California Press, Berkeley, CA.

Sawyer, J.O and T. Keeler-Wolf. 1995. A manual of California vegetation. California Native Plant Society. Sacramento.

Appendix A. Riparian Corridor Map Prepared by Mike Turnrose, Turnrose Land Surveying

ALBION ENVIRONMENTAL, INC.
NATURAL AND CULTURAL RESOURCES CONSULTANTS

1414 SOQUEL AVENUE, SUITE 205
SANTA CRUZ, CALIFORNIA 95062

TELEPHONE (831) 469-9128
FACSIMILE (831) 469-9137

November 29, 2005

Rod Lacasia
#4 El Sereno Drive
San Carlos, CA 94070

Re: Riparian Update, APN 047-105-020, El Granada, California

Dear Rod:

This report describes the results of a site visit I conducted on your property located on San Carlos Avenue in El Granada, San Mateo County, California (APN 047-105-020) ("Project Area"). I met you and several of your neighbors on the Project Area on November 16, 2005 to examine the status of riparian vegetation that had been previously cleared, as addressed in the October 15, 2004 letter report, *Riparian Delineation on San Carlos Avenue Parcel (APN 047-105-020), El Granada*, I prepared for the previous landowner, Robert Ray. In that report, I recommended revisiting the Project Area after one growing season had elapsed to determine whether riparian vegetation was reestablishing at an acceptable rate, and, if not, to provide recommendations to facilitate vegetation establishment.

During discussions with you and your neighbors, two issues arose: (1) the edge of the riparian corridor that existed prior to vegetation clearing, and (2) the reestablishment of riparian vegetation in cleared areas.

Riparian Boundary

In the October 2004 letter report, I estimated the location of the riparian corridor that existed just prior to the June 2004 vegetation clearing on the Project Area. During the November 2005 field visit, we discussed which datum to use as the "baseline" from which to estimate riparian extent.

Vegetation is dynamic and changes continually due to natural and man-made events. Therefore, any delineation of a riparian corridor or other plant community represents a snapshot in the life of that community. The extent of riparian vegetation on the Project Area has clearly changed over time. San Mateo County's 1994 Montecito Riparian Corridor map delineates the riparian corridor boundary further south (downslope) than that estimated in the October 2004 report. A neighbor, Fritz Ender, provided photographic and anecdotal evidence indicating that the Project Area was cleared in 2000. He suggested that riparian vegetation was removed, and prior to the 2000 clearing, extended further upslope (north) than that estimated to occur prior to the June 2004 clearing and delineated in the October 2004 report.

My original 2004 riparian delineation was conducted as a response to the clearing that took place in June 2004, and the goal was to estimate the riparian extent that occurred just prior to June 2004 clearing. Based on this, and the fact that my original field visit occurred relatively recently (one or two months) after the clearing when remnant and resprouting vegetation was still somewhat identifiable (aiding in the delineation), the datum I used (in the October 2004 report and this report) for estimating the limits of the riparian corridor is vegetation occurring just prior to the

June 2004 clearing. The feasibility and desirability of using datums earlier than June 2004 for estimating riparian extent would have to be determined by San Mateo County and/or Coastal Commission staff.

As stated in the October 2004 report, the estimate of the pre-cleared riparian boundary was based primarily on topography, vegetation pattern, and resprouting vegetation. In order to address concerns about the riparian extent expressed by your neighbors during the November 2005 site visit, I examined photographs provided by Mr. Ender, photographs located on www.sanmateo.org, and a February 27, 2004 color orthophoto obtained from Terraserver USA.

The photos provided by Mr. Ender show what appears to be clearing of willows and other riparian vegetation in the lowest portion of the Project Area, confirming that riparian vegetation was removed as part of the clearing. (Note: The photos also show what appears to be the removal of a woodrat nest. This report and the October 2004 report only address issues related to delineating the riparian corridor and do not address wildlife or other biotic issues).

The orthophoto (Appendix A) shows a structure break (based on color and texture) between what appears to be the edge of the intact willow canopy and a shorter plant community upslope. This is in the vicinity of the "Edge of Potential Former Riparian Corridor" in the October 2004 report. I am unable to determine the species composition of the shorter community from the orthophoto. However, by examining photographs provided by Mr. Ender and available at www.sanmateo.org taken in the general area during clearing operations, this vegetation appears to be composed primarily of typical coastal scrub species—such as pampas grass (*Cortaderia jubata*[1]), coyote brush (*Baccharis pilularis*), and poison oak (*Toxicodendron diversilobum*)—and therefore does not meet the County's riparian definition.

The most accurate and definitive way to determine the riparian boundary would be to examine pre-cleared vegetation in the field. Since this is obviously impossible, one can only make an estimate based on indirect data. Based on the data available to me, The "Edge of Potential Former Riparian Corridor" depicted in the October 2004 report remains my best estimate of the edge of the riparian corridor that occurred prior to the June 2004 clearing.

Vegetation Reestablishment

Riparian vegetation in the cleared area is not reestablishing rapidly. Approximately 50 percent of the area is bare ground. Some native species, such as poison oak, California blackberry (*Rubus ursinus*), California bee plant (*Scrophularia californica*), and thimbleberry (*Rubus parviflorus*), are reestablishing. However, two invasive non-native species, pampas grass, and French broom (*Genista monspessulana*) are also establishing, and have the potential to increase rapidly and impede native species establishment. No willows were observed colonizing the area.

The high cover of bare ground, even after a complete growing season (with above-average rainfall) had elapsed, contrasts previously cleared areas upslope that have much higher vegetation cover. This may be the result of a slow natural recovery processes or possibly indicative of soil disturbance (mechanical or chemical) persisting from 2004 vegetation clearing that is delaying or inhibiting vegetation reestablishment. Prior to replanting, soil testing may be advisable to ensure revegetation success.

[1] Botanical nomenclature follows Hickman (1993)

The high cover of bare ground, the presence of invasive non-native species, and the lack of willow establishment indicates that revegetation may be needed to facilitate riparian vegetation establishment in this area.

Conceptual Revegetation Plan

Revegetation Area

The revegetation area should include the area contained within the "Edge of Potential Former Riparian Corridor" described in the October 2004 report. Currently, this area is composed of approximately 50 percent cover of bare ground, low cover of native species, and an increasing cover of non-native invasive species.

Revegetation Goals

The goal of the revegetation is to facilitate riparian vegetation establishment in the cleared portion of the riparian corridor. The revegetation should improve the biotic functions and values of the area by providing species and structural diversity in the cleared area similar to that contained in the adjacent intact riparian woodland. Additional goals include removing invasive, non-native species (such as French broom and pampas grass) from the cleared area that serve to displace native species and lower biotic functions and values of the area.

Planting Plan

Prior to planting, non-native species, such as pampas grass and French broom, should be removed from the area. Native species that occur in the adjacent intact riparian corridor should be used. Arroyo willow should be the primary species planted to help reestablish a willow canopy contiguous with the adjacent riparian corridor. Additional native understory species should be planted amidst the willows to help facilitate a diverse native riparian corridor. A list of proposed species for planting is presented in Table 1.

Table 1. Species proposed for planting.

Species	Planting Size
arroyo willow (*Salix lasiolepis*)	Onsite Cuttings
creek dogwood (*Cornus sericea* ssp. *occidentalis*)	1-Gallon Pots
red flowering currant (*Ribes sanguineum*)	1-Gallon Pots
twinberry (*Lonicera involucrata*)	1-Gallon Pots
California blackberry (*Rubus ursinus*)	1-Gallon Pots
thimbleberry (*Rubus parviflorus*)	1-Gallon Pots

Monitoring

Monitoring should be conducted for three years after planting, starting with the first spring after planting. Proposed performance standards for species survival, non-native cover, etc. are presented below. Monitoring should consist of: (1) recording species survival and cover in relation to performance standards, (2) identifying constraints to native vegetation establishment, such as death of plantings and invasion by non-natives; and (3) photographic documentation from fixed photo points.

Year 1

- Planted willow cuttings and other native species will have an 85 percent survival rate.
- Invasive plants on the California Exotic Pest Plant Council (CalEPPC) "A" List will not exceed 15 percent absolute cover in the revegetation area.

Year 2

- Planted willow cuttings and other native plantings will have an 80 percent survival rate.
- Willow cover throughout the revegetation area will exceed 25 percent absolute cover.
- Invasive plants on the California Exotic Pest Plant Council (CalEPPC) "A" List will not exceed 15 percent absolute percent cover.

Year 3

- Willow cover throughout the revegetation area will exceed 40 percent absolute cover.
- Native plant species will dominate the revegetation area.
- Invasive plants on the California Exotic Pest Plant Council (CalEPPC) "A" List will not exceed 15 percent absolute cover

Reporting

An annual monitoring report should be prepared after each year of monitoring and submitted to the County for review. The monitoring report should present results of the field monitoring in relation to the performance standards, provide recommendations for remedial action to ensure revegetation success (if necessary), and provide photographic documentation of the revegetation area for year to year visual comparison.

Please contact me if you have questions or need additional information.

Sincerely,

Tom Mahony
Plant Ecologist

References

Hickman, J.C. (ed.). 1993. The Jepson manual: higher plants of California. University of California Press, Berkeley, CA.

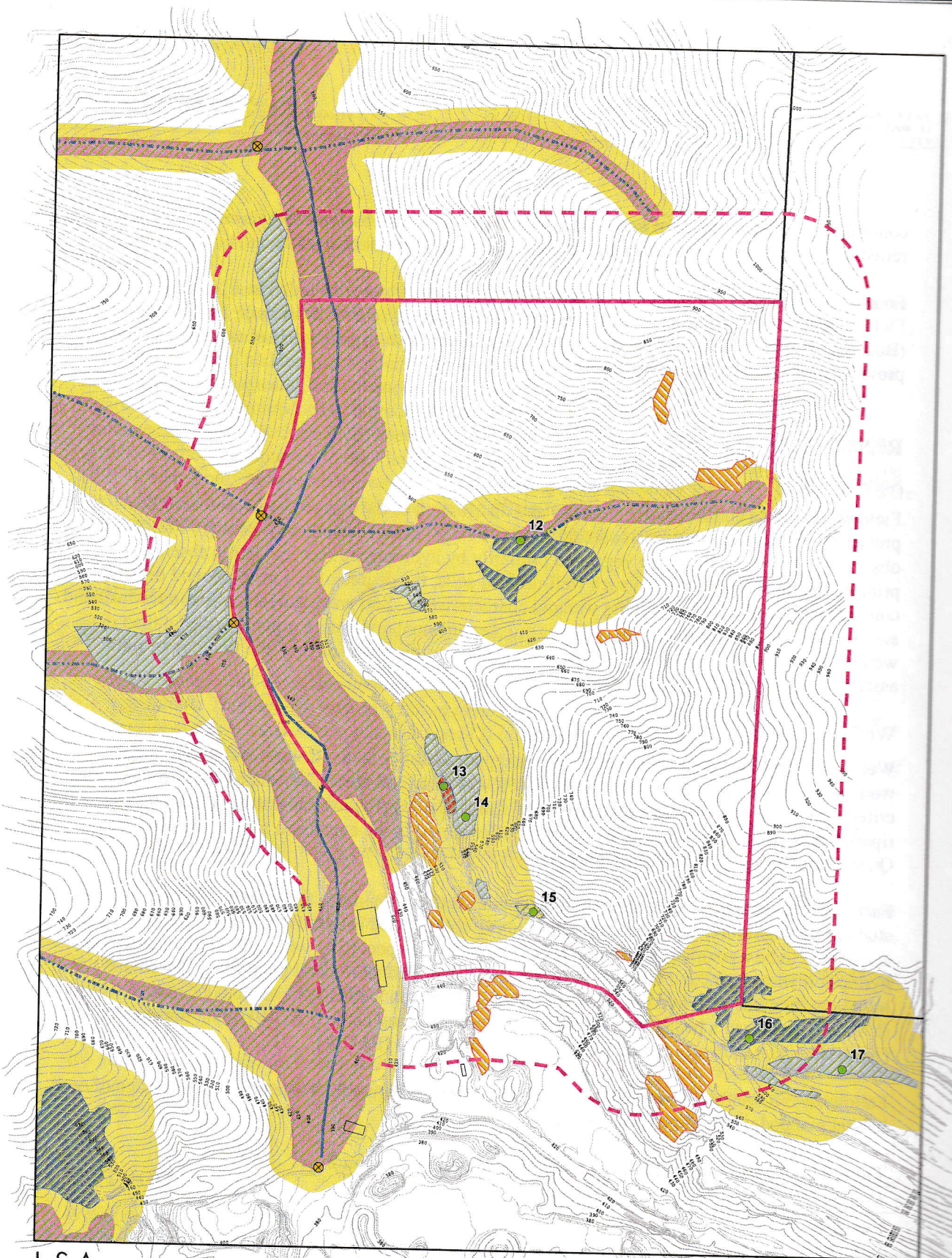


FIGURE 5

Pilarcitos Quarry
Proposed Expansion Area 2
Wetlands and Riparian Areas

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