COUNTY OF MENDOCINO
DEPARTMENT OF PLANNING AND BUILDING SERVICES
790 SOUTH FRANKLIN STREET · FORT BRAGG · CALIFORNIA · 95437

IGNACIO GONZALEZ, DIRECTOR
Telephone 707-964-5379
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September 11, 2009

Ray & Sydney Feeney
281 Linda Vista Avenue
Pasadena, CA 91105

Referral and Information back to the Gualala Municipal Advisory Council (GMAC)

Transmitted via email.

Subject:	Coastal Development Permit Application No.:	CDP 62-2008
	Site Address:	46561 Getchell Gulch Road
	Assessor's Parcel No.:	144-050-14

Dear GMAC & Mr. & Mrs. Feeney:

The purpose of this letter is to bring some closure and document some of the conclusions drawn by staff from the permitting process to this point. As you recall, GMAC held a hearing on the project on January 8, 2009. Planning staff provided a follow up letter dated February 4, 2009 requesting that you provide a series of reports to address concerns raised by GMAC, interested parties and staff. We have now received and reviewed every study and report requested. Your compliance with the permit process requirements was to the highest standard. You obtained all local, reputable consultants and provided material in a prompt and cooperative manner. Since the beginning of the permit process you have acted as model applicants and staff appreciates your willingness to work us.

This project did not start out in a good manner. Due in part to some confusion and lack of knowledge by County staff of the property condition before clearing work began and the tremendous amount of citizen input and concern, your reputation and intentions were called into question. This is very unfortunate. Staff is pleased to report back to the GMAC that the results of the numerous studies we reviewed have determined that no egregious violations occurred on the subject property and no significant mitigation measures will be needed to protect the site or adjacent properties.

A Brief Summary of Reports Submitted:

Erosion Control: Paoli Engineering & Surveying provided an Erosion Control Plan dated February 24, 2009 to address GMAC and staff concern for the site following the brush removal activities. The report is attached for your review. The report provides recommendations that fiber rolls be installed on slopes shown on the Paoli prepared site plan. However, Mr. Paoli commented that he saw no erosion occurring on the cleared area, even on the steepest slopes (about 21%). He stated that 100% of the cleared area had been seeded and approximately 50% of any given square had young, healthy grass growing. The engineering report and site review provided staff with a level of confidence that the site clearing would not cause significant erosion during the rainy seasons.

Cultural Resources: A Cultural Resources Study was prepared for the sites as a requirement of the Mendocino County Archeological Commission recommendation. The report prepared by Eileen Barrow, B.A. & Thomas M. Origer, M.A. dated February 6, 2009 was accepted by the Archeological Commission

at their March 11, 2009 meeting. The results of the survey were that no cultural, historical or archeological sites were observed on the subject parcel.

Septic System: Carl Rittiman & Associates, Inc. provided some preliminary soils information to the Division of Environmental Health regarding the ability of the subject parcel to support residential development. While this was not a full blown septic system design (because you are not proposing to install a septic system or house on the site at this time) the information did show the Division that the site contains soils which are capable of supporting the installation of an on-site septic disposal system. A more fully developed design will need to be submitted in the future to the Division for final approval.

ESHA Report: Perhaps the most important report requested by staff was a Botanical Survey and ESHA (Environmentally Sensitive Habitat Area) assessment. This report took the longest time to complete due to timing requirements for appropriate blooming windows. The report was prepared by William Maslach, dated July 2009. Mr. Maslach has prepared numerous reports in the County and is also an employee with the State Parks & Recreation Department out of the Russian Gulch branch office near Mendocino. The report is attached for your review. The report is extremely thorough and unwavering in its conclusions. The botanical consultant explained the report was conducted to locate special-status and rare plants, special plant communities and wetlands. Additionally, site and background investigations were made to determine the extent of previous vegetation removal on the parcel.

Vegetation is described by Mr. Maslach as a meadow with some redwoods surrounded by bishop pine and redwood trees. He concluded that no special-status species, rare plant communities, or wetlands occur on the site. He said potential building sites exist outside of any 100 foot ESHA buffer (as normally required by the Coastal Zoning Code). Mr. Maslach also specifically evaluated the site to help determine if "Major Vegetation Removal" per Section 20.608.032 of the MCCZC had occurred on the site. On page 17 of the report, he concluded that, *"After analyzing the available information regarding the clearing of vegetation on the parcel, including the applicant's verbal account, aerial photographs, and boundaries of remaining vegetation, it was concluded that the vegetation did not result in what the County considers "Major Vegetation Removal".* Staff has to concur with Mr. Maslach's findings after reviewing the report which we found to be detailed. Finally, Mr. Maslach recommended that no planting of invasive landscaping commonly used by property owners should occur on the site to help the overall sensitive and important coastal ecosystem.

On July 29, 2009 I made an unannounced site visit to the property with Code Enforcement officer, Angie Hamilton. Ray Feeney and Sydney Feeney were both on site working on their surrounding properties and invited us to take a tour of the subject site and all their lands in the Getchell Gulch area. It was quickly evident that the Feeney's took great pride in caretaking their rather vast property and I observed absolutely no violations of land use regulations. It is impossible to know if I site viewed every inch of their parcels but was certainly free to go anywhere I chose and was greeted with an open book/nothing to hide mentality. The subject parcel showed signs of erosion and contained clusters of native trees. The pride of ownership and dedication to the maintaining the condition of their property was evident.

The culmination of reviewing these reports and visiting the site provide the underlying basis for the following conclusions from staff. The Feeney's have not destroyed any ESHAs; they have not caused an erosion problem on their parcel or adjacent parcels; while vegetation and brush was removed without prior notice to the County it did not result in "Major Vegetation Removal". Finally, the Feeney's reputation has suffered unfairly as a result of this project and process. A lot of time passed beyond their control for these conclusions to be reached by staff. It is unfortunate the process takes so long but the thoroughness of the review is to everyone's benefit.

The Permit process will now move into the report writing phase. We wanted to provide GMAC with a chance to review the reports and staff's comments prior to that occurring due to the high interest of the local community in the project and the nature of the project. The Feeney's still want to receive preliminary approval for a future building site. While the County does not normally approve building sites without more detailed residential development proposals, the amount of information provided to the County for this project gives staff enough to preliminarily state that the site contains an approvable building site. A new CDP or modification to this permit would be required for the approval of an actual structure. A lot of the information gathered in this review can be utilized in the future for any subsequent development proposals. Also, the Feeney's have abandoned the idea of relocating the existing rough, dirt driveway access off Getchell Gulch to the subject site. At a time when more development is proposed, the driveway access can be more thoroughly reviewed but for now no change in location is requested.

Sincerely,

Rick Miller
Senior Planner

Cc: Parties of interest
Frank Lynch, Chief Planner
Nancy Cave, Coastal Commission
Bob Merrill, Coastal Commission

Paoli Engineering & Surveying

DAVID E. PAOLI

535 E Chestnut St., Fort Bragg, CA 95437
Phone: 707-964-5225 – Fax: 707-961-1452
E-mail: engineersurvey@yahoo.com

CALIFORNIA REGISTERED CIVIL ENGINEER/LAND SURVEYOR – RCE 18341
OREGON REGISTERED CIVIL ENGINEER – NO. 8426
OREGON PROFESSIONAL LAND SURVEYOR – NO. 1289

February 24, 2009

Rick Miller, Senior Planner
Planning & Building Services
790 S Franklin St
Fort Bragg, CA 95437

Re: Erosion Control Plan, CDP 62-2008 (Feeney)

Dear Mr. Miller:

I performed a site review of this property on February 7, 2009 and then again during the data gathering phase for the topographic survey on February 16th. Both of these site visits were preceded by heavy rains.

I observed that 100 percent of the cleared area shown on the topographic map had been seeded, and approximately 50 percent of any given square foot had young, healthy grass growing. My experience leads me to believe that the grass will continue to in-fill and will be complete by late spring.

I saw no erosion occurring on the cleared area, even on the steepest slopes (about 21 percent). However, no more than 50 percent of the average annual rainfall has fallen so prudence calls for additional slope protection until the new grass has in-filled. Based on this, I am proposing that fiber rolls be installed on the slopes as shown on the Erosion Control Plan. These rolls can be removed and the disturbed areas reseeded by June 1st.

In terms of access to the lot, there is an existing unimproved driveway at the approximate midpoint of the south property line. This driveway is about 50 feet long and could easily be upgraded to the standard section shown on the Erosion Control Plan without taking any trees over 8 inches in diameter. Yardage moved is estimated at 11 yards of cut and fill. Raw slopes would be seeded.

I recommend that the "Planned Building Site" shown on the previously submitted Site Plan not be included until a definite development program with building size and shape, number of bedrooms for septic design, garage location, and other parameters have been firmed up. My plan does not include any additional vegetation clearing at this time, and I believe that by summer the grass will be firmly established and no further actions will be necessary for erosion control.

If you have any questions, please call me at 707-964-5225.

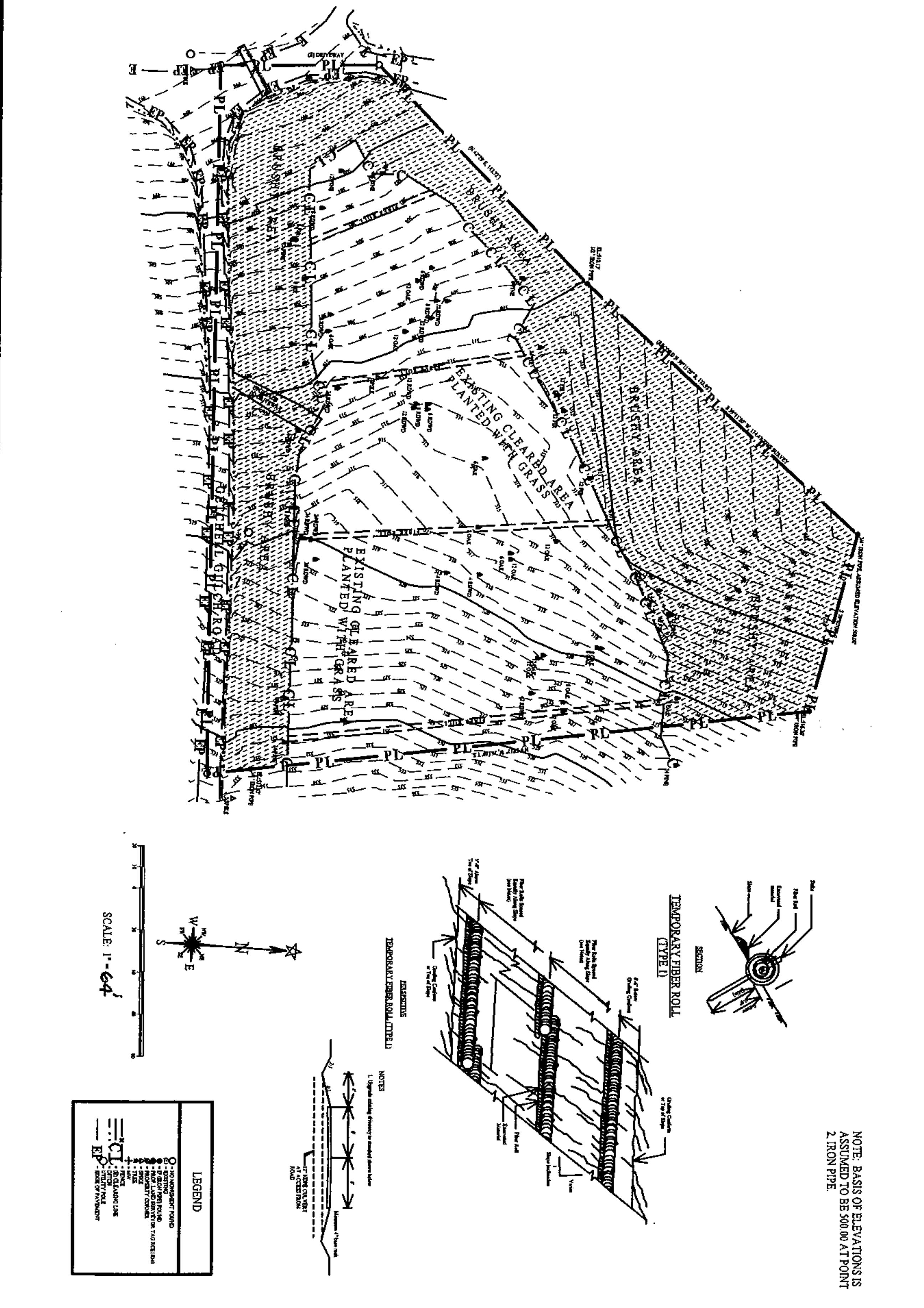
Sincerely,

David E. Paoli

David E. Paoli
Professional Engineer/Land Surveyor

PES: Job 0906

Cc: Ray Feeney
281 Linda Vista Ave.
Pasadena, CA 91105-1253



DRAWN BY: MEC DATE: FEBRUARY 17, 2009 CHECKED: OEP REVISED: FEBRUARY 24, 2009 BY: MEC JOB NUMBER: 0906	TOPOGRAPHICAL MAP FOR: FEENEY 46561 GETCHELL GULCH RD GUALALA CA 95445	EROSION CONTROL PLAN	Paoli Engineering & Surveying 535 Chestnut St. Fort Bragg, CA 95437 (707) 964-5225

SHEET 1 OF 1

COUNTY OF MENDOCINO
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ARCHAEOLOGICAL COMMISSION ACTION SHEET

CASE NUMBER: CDP 62-2008
OWNER: RAY & SYDNEY FEENEY
HEARING DATE: MARCH 11, 2009
PROJECT COORDINATOR: RICK MILLER

ATTENDANCE: None 4 - 0

☐ **ARCHAEOLOGICAL SURVEY REQUIRED (CONSULTANT LIST ATTACHED)**
Until a survey has been prepared, submitted to, and found to be complete by the Archaeological Commission, the time limits specified by State law relative to the processing of application are suspended. Surveys must be submitted two weeks prior to next available meeting date (2nd Wednesdays of each month) to be placed on the agenda for consideration.

☐ **NO SURVEY REQUIRED**
(APPLICANT ADVISED OF THE DISCOVERY CLAUSE, MCC 22.12.090)

☑ **SURVEY ACCEPTED**

Survey Prepared by: Eileen Barrow B.A and Thomas M. Origer - M.A. **Date:** Feb 6, 2009

Findings:

☑ **No Cultural, Historical or Archaeological Sites Observed (MCC 22.12.090 -Discovery Clause shall be adhered to)**

☐ **Site(s) Identified-Recommendations of the Report shall be strictly adhered to**

☐ **ADDITIONAL COMMENTS/RECOMMENDATIONS/CONDITIONS OF THE COMMISSION**

RECEIVED
MAR 13 2009
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FORT BRAGG CA

Mendocino County Code Section 22.12.090 Discoveries. (Portion of)

(A) Any person who in the preparation for or in the process of excavating or otherwise disturbing earth, discovers any archaeological site shall take all of the following actions:

(1) Cease and desist from all further excavation and disturbances within one hundred (100) feet of the discovery;

(2) Make notification of the discovery to the Director of Planning and Building Services...

See Over....

BOTANICAL SURVEY AND ESHA ASSESSMENT

FOR
46561 GETCHELL GULCH ROAD
(APN 144-050-14)
GUALALA, CALIFORNIA
MENDOCINO COUNTY

prepared by:
William Maslach
32915 Nameless Lane
Fort Bragg, California 95437
(707) 964-4547
geobotanical@mcn.org

July 2009

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1.0 Summary

A survey on an approximately 1-acre parcel zoned rural-residential was conducted to locate rare plants, plant communities, and wetlands within the project area. Additionally, site and background investigations were made to determine the extent of previous vegetation removal on the parcel. Vegetation is a meadow with some redwoods surrounded by bishop pine and redwood. An unpaved, small entrance road exists on the Project Site. No special-status plant species, rare plant communities, or wetlands occur on the parcel. A building site exists on the parcel outside of any 100-foot ESHA buffer.

2.0 Background/Project Description

The botanical survey was conducted to determine if a building envelope occurs on the parcel that is outside of any 100-foot ESHA buffer. Currently, no building plans have been submitted for this project.

The purpose of the study was to describe the existing vegetation communities, survey the parcel for special-status plant species, vegetation communities, streams, and wetlands, and recommend appropriate mitigation measures that help to reduce the impacts to wetland-, riparian-, and rare plant-buffers, which are considered Environmentally Sensitive Habitat Areas (ESHA's) under the Mendocino County Local Coastal Plan (LCP), (Mendocino County, 1991).

Because trees were removed from the property prior to issuance of a coastal development permit, the extent of the vegetation removal was evaluated under the LCP's definition of "Major Vegetation Removal" (Sec. 20.608.032).

3.0 Project Site Description

The Project Site is an approximately 1.2-acre parcel zoned rural-residential, east of Highway 1 and within the California Coastal Zone. It is located at located at 46561 Getchell Gulch Road (A.P.N. 144-050-14) Gualala, California. It occurs on the NW ¼ of Section 17, Township 11 N, Range 15 W of the Mount Diablo Base Meridian.

Soils are mapped as the Caspar-Quinliven-Ferncreek complex, 9 to 30 percent slopes. They are primarily composed of marine deposits derived from sandstone and are mostly well to moderately well drained soils with a small component of somewhat poorly drained soils (Natural Resource Conservation Service, 2001). Topography is mostly flat to gently sloping (~12% slope).

The only pre-existing improvement to the Project Site is a small section of dirt road that accesses a portion of the lot. Other work completed was vegetation clearing in 2008, which is addressed in Table 4.

The vegetation on the site is a meadow of primarily non-native grasses (*Lotus junceus, Aria caryophyllea, Aria praecox, Vulpia myuros, Pteridium aquilinum, Lolium perenne,* resprouting *Vaccinium ovatum*) with some stands of trees (*Lithocarpus densiflorus, Sequoia sempervirens*) in the middle and surrounded by a forest of mixed conifers such as redwood, Douglas-fir (*Pseudotsuga menziesii*), tanoak, and bishop pine (*Pinus muricata*).

4.0 Methods

4.1 Botanical Survey

A field survey for botanical and wetland resources was conducted on the Project Site on March 22, April 3, and June 28, 2009. The survey protocol was based on Guidelines for Assessing the Effects of Proposed Developments on Rare, Threatened, and Endangered Plants and Plant Communities developed by James Nelson (CDFG 2000). The rare plants and plant communities considered in the survey are the native plants of limited abundance in California with known occurrence or distribution in Mendocino County, and were derived from the following lists:

- species listed or proposed for listing as threatened or endangered under the federal Endangered Species Act;
- species that are candidates for possible future listing as threatened or endangered under the federal Endangered Species Act;
- species listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act;
- plants listed by the California Native Plant Society (CNPS) as "presumed extinct" in California (List 1A);
- plants considered by CNPS to be "rare, threatened, or endangered in California" (Lists 1B and 2);
- plants listed by CNPS as plants about which more information is needed to determine their status and plants of limited distribution (Lists 3 and 4), which may be included as special-status species on the basis of local significance or recent biological information;
- plant communities listed in the California Natural Diversity Database;
- plants of regional or specific interest not on any list above.

These special-status plants were further segregated regionally based on known occurrences on the project area USGS 7.5' quadrangle (Gualala) and the adjacent quadrangles (Zeni Ridge, McGuire Ridge, Stewarts Point, Eureka Hill, Point Arena, Saunders Reef). The regional assessment utilized the California Native Plant Society's (CNPS) electronic inventory (CNPS 2009) and the California Department of Fish and Game's (CDFG), Natural Diversity Data Base Rare Find (CDFG 2009). These special-status species and all other species derived from the aforementioned lists, their associated habitats, and their potential for occurrence in the project area are listed in Table 1.

4.1.1 Blooming Period

A floristic and seasonally appropriate survey was conducted in the field at the time of year when rare, threatened, or endangered species are both evident and identifiable for all species expected to occur in the Study Area.

Table 1. Special-Status Plants with Potential Occurrence on the Project Site. This table is derived from federal, state, and CNPS–listed plant species, including plants of regional significance. Explanation of column headings:

FED: federal status includes federally rare (FR), threatened (FT), or endangered (FE)

STATE: California state status includes rare (CR), threatened (CT), or endangered (CE)

CNPS: California Native Plant Society ranked inventory of native California plants thought to be at risk,

List 1A (1A) Presumed extinct in California.
List 1B (1B) Rare, threatened, or endangered in California and elsewhere.
List 2 (2) Rare, threatened or endangered in California but more common elsewhere.
List 3 (3) More information needed, a review list.
List 4 (4) Species of limited distribution, a watch list.

A Threat Code extension has been added following the CNPS List (e.g. 1B.1, 2.2 etc.)

Threat Code extensions and their meanings:
.1 - Seriously endangered in California
.2 – Fairly endangered in California
.3 – Not very endangered in California

CNDDB ELEMENT RANK

G-RANK: Global Ranking - The global rank (G-rank) is a reflection of the overall condition of an element throughout its global range.

SPECIES OR NATURAL COMMUNITY LEVEL

G1 = Less than 6 viable element occurrences (Eos) OR less than 1,000 individuals OR less than 2,000 acres.
G2 = 6-20 Eos OR 1,000-3,000 individuals OR 2,000-10,000 acres.
G3 = 21-80 Eos OR 3,000-10,000 individuals OR 10,000-50,000 acres.
G4 = Apparently secure; this rank is clearly lower than G3 but factors exist to cause some concern; i.e., there is some threat, or somewhat narrow habitat.
G5 = Population or stand demonstrably secure to ineradicable due to being commonly found in the world.

SUBSPECIES LEVEL

Subspecies receive a T-rank attached to the G-rank. With the subspecies, the G-rank reflects the condition of the entire species, whereas the T-rank reflects the global situation of just the subspecies or variety. For example: *Chorizanthe robusta* var. *hartwegii*. This plant is ranked G2T1. The G-rank refers to the whole species range i.e., *Chorizanthe robusta*. The T-rank refers only to the global condition of var. hartwegii.

S-RANK: STATE RANKING - The state rank (S-rank) is assigned much the same way as the global rank, except state ranks in California often also contain a threat designation attached to the S-rank.

S1 = Less than 6 viable Eos OR less than 1,000 individuals OR less than 2,000 acres
S1.1 = very threatened
S1.2 = threatened
S1.3 = not very threatened OR no current threats known
S2 = 6-20 Eos OR 1,000-3,000 individuals OR 2,000-10,000 acres
S2.1 = very threatened
S2.2 = threatened
S2.3 = not very threatened OR no current threats known
S3 = 21-80 Eos or 3,000-10,000 individuals OR 10,000-50,000 acres
S3.1 = very threatened
S3.2 = threatened
S3.3 = not very threatened OR no current threats known
S4 = Apparently secure within California; this rank is clearly lower than S3 but factors exist to cause some concern; i.e. there is some threat, or somewhat narrow habitat.
S5 = Demonstrably secure to ineradicable in California. NO THREAT RANK.

Notes:

1. Other considerations used when ranking a species or natural community include the pattern of distribution of the element on the landscape, fragmentation of the population/stands, and historical extent as compared to its modern range. It is important to take a bird's eye or aerial view when ranking sensitive elements rather than simply counting Eos.
2. Uncertainty about the rank of an element is expressed in two major ways:
   By expressing the rank as a range of values: e.g., S2S3 means the rank is somewhere between S2 and S3.
   By adding a ? to the rank: e.g., S2? This represents more certainty than S2S3, but less than S2.
3. Other symbols
   GH - All sites are historical; the element has not been seen for at least 20 years, but suitable habitat still exists (SH = All California sites are historical).
   GX - All sites are extirpated; this element is extinct in the wild (SX = All California sites are extirpated).
   GXC - Extinct in the wild; exists in cultivation.
   G1Q - The element is very rare, but there are taxonomic questions associated with it.
   T - Rank applies to a subspecies or variety.

TAXON	COMMON NAME	CNPS	FED	STATE	CNDDB ELEMENT RANK		HABITAT REQUIREMENTS	HABITAT IN PROJECT SITE
					G-RANK	S-RANK		
Abronia umbellata ssp. *breviflora*	pink sand-verbena	1B.1	-	-	G4G5T2	S2.1	coastal dunes	No
Agrostis blasdalei	Blasdale's bent grass	1B.2	-	-	G2	S2.2	coastal bluff scrub, coastal dunes, coastal prairie	No
Agrostis clivicola var. *punta-reyesensis*	Point Reyes bent grass	NL			G3?T1Q	S1.2	coastal bluff. Endemic to Point Reyes Peninsula but known from two locations on near Stewart's Point	No
Angelica lucida	Sea-watch	4.2	-	-	G5	S2S3	coastal bluffs, beaches	No
Arctostaphylos canescens ssp. *sonomensis*	Sonoma manzanita	1B.2			G3G4T2	S2.1	chaparral, lower montane coniferous forest/sometimes serpentinite. Inland from the coast.	No
Arctostaphylos mendocinoensis	pygmy manzanita	1B.2	-	-	G1	S1?	closed cone coniferous forest (acidic sandy clay)	No
Arctostaphylos stanfordiana ssp. *raichei*	Raiche's manzanita	1B.1			G3T2?	S2?	chaparral, lower montane coniferous forest (openings)/rocky, often serpentinite. Inland from the coast.	No
Astragalus agnicidus	Humboldt milk-vetch	1B.1	-	SE	G1	S1.1	broadleaf upland forests, North Coast coniferous forests / disturbed areas	No
Astragalus pycnostachyus var. *pycnostachyus*	coastal marsh milk-vetch	1B.2	-	-	G3?T2	S2.2	coastal dunes (mesic), marshes and swamps, (coastal salt, and streamsides)	No
Blennosperma nanum var. *robustum*	Point Reyes blennosperma	1B.2	-	CR	G4T1	S1.2	coastal prairie, coastal scrub. Known only from Glass Beach, Fort Bragg on the Mendocino coast.	No
Boschniakia hookeri	small groundcone	2.3	-	-	G5	S1S2	North Coast coniferous forest	Yes
Calamagrostis bolanderi	Bolander's reed grass	4.2	-	-	G3	S3.2	bogs & fens, broadleaf upland forests, closed cone coniferous forest, coastal scrub, meadows (mesic), marshes & swamps (freshwater), North Coast coniferous forests / mesic	Yes
Calamagrostis crassiglumis	Thurber's reed grass	2.1	-	-	G3Q	S1.2	coastal scrub (mesic), freshwater marshes & swamps	No
Calamagrostis foliosa	leafy reed grass	4.2	-	CR	G3	S3.2	coastal bluff scrub, North Coast coniferous forest / rocky. Most occurrences from the King Range	No
Callitropsis pygmaea	pygmy cypress	1B.2	-	-	G2T2	S2.2	closed cone coniferous forest (podzol-like soil)	Yes
Calystegia purpurata ssp. *saxicola*	coastal bluff morning-glory	1B.2	-	-	G4T2	S2.2	coastal dunes, coastal scrub	No
Campanula californica	swamp harebell	1B.2	-	-	G3	S3.2	bogs & fens, closed cone coniferous forest, coastal prairie, meadows, marshes & swamps (freshwater), North Coast coniferous forests / mesic	No
Cardamine pachystigma var. *dissectifolia*	dissected-leaved toothwort	3	-	-	G?T3?	S2S3	chaparral, lower montane coniferous forest / usually serpentinite, rocky. Above 700'	No
Carex arcta		2.2			G5	S1S2	bogs and fens, North Coast coniferous forest (mesic)	No

TAXON	COMMON NAME	CNPS	FED	STATE	CNDDB ELEMENT RANK		HABITAT REQUIREMENTS	HABITAT IN PROJECT SITE
					G-RANK	S-RANK		
Carex californica	California sedge	2.3	-	-	G5	S2?	bogs & fens, closed cone coniferous forest, coastal prairie, meadows, marshes & swamps (margins)	Yes
Carex lenticularis var. *limnophila*	lakeshore sedge	2.2			G5T5	S1S2.2	costal swamps and bogs, North Coast coniferous forests (mesic)	No
Carex livida	livid sedge	1A	-	-	G5	SH	bogs & fens	No
Carex lyngbyei	Lyngbye's sedge	2.2	-	-	G5	S2.2	marshes & swamps (brackish or freshwater)	No
Carex saliniformis	deceiving sedge	1B.2	-	-	G2	S2.2	coastal prairie, coastal scrub, meadows, marshes & swamps (coastal salt) / mesic	No
Carex viridula var. *viridula*	green sedge	2.3	-	-	G5T5	S1.3	bogs & fens, marshes & swamps (freshwater), North Coast coniferous forests (mesic)	No
Castilleja affinis ssp. *litoralis*	Oregon coast paintbrush	2.2	-	-	G4G5T4	S2.2	coastal bluff scrub, coastal dunes, coastal scrub/sandy	No
Castilleja ambigua ssp. *humboldtiensis*	Humboldt Bay owl's clover	1B.2	-	-	G4T2	S2.2	marshes & swamps (coastal salt)	No
Castilleja mendocinensis	Mendocino coast paintbrush	1B.2	-	-	G2	S2.2	coastal bluff scrub, closed cone coniferous forest, coastal dunes, coastal prairie, coastal scrub	No
Ceanothus gloriosus var. *exaltatus*	glory bush	4.3	-	-	G4T3	S3.3	chaparral	Yes
Ceanothus gloriosus var. *gloriosus*	Point Reyes ceanothus	4.3	-	-	G5T3	S3.3	coastal bluff scrub, closed cone coniferous forest, coastal dunes, coastal scrub / sandy	No
Chorizanthe howellii	Howell's spineflower	1B.2	FE	CT	G1	S1.2	coastal dunes, coastal prairie, coastal scrub / sandy	No
Clarkia amoena ssp. *whitneyi*	Whitney's farewell-to-spring	1B.1	-	-	G5T2	S2.1	coastal bluff scrub, coastal scrub	No
Collinsia corymbosa	round-headed Chinese houses	1B.2	-	-	G1	S1.2	coastal dunes	No
Coptis laciniata	Oregon goldenthread	2.2	-	-	G4G5	S3.2	meadows and seeps, North Coast coniferous forest streambanks/mesic	No
Erigeron supplex	supple daisy	1B.2	-	-	G1	S1.1	coastal bluff scrub, coastal prairie	No
Eriogonum kelloggii	Kellogg's buckwheat	1B.2			G1	S1.2	Inland from the coast. Most collections on Red Mountain where it is possibly endemic.	No
Erysimum menziesii ssp. *menziesii*	Menzies's wallflower	1B.1	FE	CE	G3?T2	S2.1	coastal dunes	No
Erythronium revolutum	coast fawn lily	2.2	-	-	G4	S2.2	margins of swamps, bogs, or wooded streams, broadleafed upland forest, North Coast coniferous forest / mesic, streambanks	No
Fritillaria roderickii	Roderick's fritillary	1B.1	-	CE	G1Q	S1.1	coastal bluff scrub, coastal prairie, valley & foothill grasslands	No
Gilia capitata ssp. *chamissonis*	dune gilia	1B.1	-	-	G5T2	S2.1	coastal dunes, coastal scrub	No
Gilia capitata ssp. *pacifica*	Pacific gilia	1B.2	-	-	G5T3T4	S2.2?	coastal bluff scrub, coastal prairie	No
Gilia capitata ssp. *tomentosa*	woolly-headed gilia	1B.1	-	-	G5T1	S1.1	Known from only three occurrences near Tomales and Salt Pt. SP.	No

TAXON	COMMON NAME	CNPS	FED	STATE	CNDDB ELEMENT RANK		HABITAT REQUIREMENTS	HABITAT IN PROJECT SITE
					G-RANK	S-RANK		
Gilia millefoliata	dark-eyed gilia	1B.2	-	-	G2	S2.2	coastal dunes	No
Glyceria grandis	American mana grass	2.3	-	-	G5	S1.3?	bogs and fens, meadows and seeps, marshes and swamps (streambanks and lake margins)	No
Hemizonia congesta ssp. *leucocephala*	Hayfield tarplant	3	-	-	G5T2T3	S2S3	coastal scrub, valley and foothill grassland	No
Hesperevax sparsiflora ssp. *brevifolia*	short-leaved evax	2.2	-	-	G4T3	S3.2	coastal bluff scrub (sandy)	No
Horkelia marinensis	Point Reyes horkelia	1B.2	-	-	G2	S2.2	coastal dunes, coastal prairie, coastal scrub / sandy	No
Horkelia tenuiloba	thin-lobed horkelia	1B.2	-	-	G2	S2.2	broadleafed upland forest, chaparral/mesic openings, sandy	No
Juncus supiniformis	hair-leaved rush	2.2	-	-	G5	S2.2?	bogs & fens, marshes & swamps (freshwater) / near coast	No
Lasthenia conjugens	Contra Costa goldfields	1B.1	FE	-	G1	S1.1	cismontane woodland, playas (alkaline), valley and foothill grassland, vernal pools/mesic	No
Lasthenia macrantha ssp. *bakeri*	Baker's goldfields	1B.2	-	-	G3TH	SH	closed cone coniferous forest (openings), coastal scrub, meadows and seeps, marshes and swamps	No
Lasthenia macrantha ssp. *macrantha*	perennial goldfields	1B.2	-	-	G3T2	S2.2	coastal bluff scrub, coastal dunes, coastal scrub	No
Lilium maritimum	coast lily	1B.1	-	-	G2	S2.1	broadleaf upland forests, closed cone coniferous forest, coastal prairie, coastal scrub, marshes & swamps (freshwater), North Coast coniferous forests	Yes
Lilium rubescens	redwood lily	4.2	-	-	G3	S3.2	broadleafed upland forest, chaparral, lower montane coniferous forest, North Coast coniferous forest, upper montane coniferous forest/sometimes serpentinite, sometimes roadsides	Marginal
Lotus formosissimus	coastal lotus	4.2	-	-	G4	S3.2	broadleafed upland forest, coastal bluff scrub, closed-cone coniferous forest, cismontane woodland, coastal prairie, coastal scrub, meadows and seeps, marshes and swamps, North Coast coniferous forest, valley and foothill grassland/wetlands, roadsides	Marginal
Lycopodium clavatum	running-pine	2.3	-	-	G5	S2S3	marshes & swamps, North Coast coniferous forests (mesic)	No
Microseris borealis	northern microseris	2.1	-	-	G4?	S1.1	bogs and fens, lower montane coniferous forest, meadows and seeps/mesic. 3000-6000' elevation	No
Microseris paludosa	microseris	1B.2			G2	S2.2	closed-cone coniferous forest, cismontane woodland, coastal scrub, valley and foothill grassland . No specific locations for Mendocino County based on CNPS website. Mendocino County not suspected habitat based on range.	No

TAXON	COMMON NAME	CNPS	FED	STATE	CNDDB ELEMENT RANK		HABITAT REQUIREMENTS	HABITAT IN PROJECT SITE
					G-RANK	S-RANK		
Mitella caulescens	leafy-stemmed mitrewort	4.2	-	-	G5	S4.2	broadleaf upland forests, lower montane coniferous forests, meadows, North Coast coniferous forests / mesic	No
Monotropa uniflora	Indian pipe	2.2	-	-	G5	S2S3	broadleafed upland forest, north Coast coniferous forest. Not known from Mendocino County.	No
Navarretia leucocephala ssp. bakeri	Baker's navarretia	1B.1	-	-	G4T2	S2.1	wet meadows, drainage ditch. Mendocino records from inland valleys: Sherwood, Willits, & Redwood.	No
Oenothera wolfii	Wolf's evening-primrose	1B.1	-	-	G1	S1.1	coastal bluff scrub, coastal dunes, coastal prairie, lower montane coniferous forest (sandy, usually mesic)	No
Phacelia insularis var. *continentis*	North Coast phacelia	1B.2	-	-	G2T1	S1.2	coastal bluff scrub, coastal dunes / sandy	No
Pinus contorta ssp. *bolanderi*	Bolander's beach pine	1B.2	-	-	G5T3	S3.2	closed cone coniferous forest (podzol-like soil). Not found south of Cameron Ridge.	No
Pleuropogon hooverianus	North Coast semaphore grass	1B.1	-	CT	G1	S1.1	broadleafed upland forest, meadows and seeps, North Coast coniferous forest/open areas, mesic	No
Pleuropogon refractus	nodding semaphore grass	4.2	-	-	G4	S3.2?	lower montane coniferous forests, meadows, North Coast coniferous forests, riparian forests / mesic	No
Potentilla hickmanii	Hickman's cinquefoil	1B.1			G1	S1.1	coastal bluff scrub, closed-cone coniferous forest, meadows and seeps (vernally mesic), marshes and swamps (freshwater)	No
Puccinellia pumila	dwarf alkali grass	2.2	-	-	G4?	S1.1?	marshes & swamps (coastal salt)	No
Rhynchospora alba	white-beaked rush	2.2	-	-	G5	S3.2	bogs & fens, meadows, marshes & swamps (freshwater)	No
Sanguisorba officinalis	great burnet	2.2	-	-	G5?	S2.2	bogs & fens, broadleaf upland forests, meadows, marshes & swamps, North Coast coniferous forests, riparian forests / often serpentine	No
Senecio bolanderi var. *bolanderi*	seacoast ragwort	2.2	-	-	G4T4	S1.2	coastal scrub, North Coast coniferous forests	No
Sidalcea calycosa ssp. *rhizomata*	Point Reyes checkerbloom	1B.2	-	-	G5T2	S2.2	marshes & swamps (freshwater, near coast)	No
Sidalcea malachroides	maple-leaved checkerbloom	4.2	-	-	G3	S3.2	broadleaf upland forests, coastal prairie, coastal scrub, North Coast coniferous forests / often disturbed areas	No
Sidalcea malviflora ssp. *patula*	Siskiyou checkerbloom	1B.2			G5T1	S1.1	coastal bluff scrub, coastal prairie, North Coast coniferous forest /often roadcuts. One collection 2 miles south of Albion in roadside ditch.	No
Sidalcea malviflora ssp. *purpurea*	purple-stemmed checkerbloom	1B.2	-	-	G5T2	S2.2	broadleaf upland forests, coastal prairie	No
Triquetrella californica	coastal triquetrella	1B.2	-	-	G1	S1.2	coastal bluff scrub, coastal scrub/soil	No
Usnea longissima	long-beard lichen	-	-	-	G1	S1.1	semi-open canopy forests, old-growth forests	Yes

TAXON	COMMON NAME	CNPS	FED	STATE	CNDDB ELEMENT RANK		HABITAT REQUIREMENTS	HABITAT IN PROJECT SITE
					G-RANK	S-RANK		
Veratrum fimbriatum	fringed false-hellebore	4.3	-	-	G3	S3.3	bogs & fens, coastal scrub, meadows, North Coast coniferous forests (mesic)	No
Viburnum ellipticum	oval-leaved viburnum	2.3			G5	S2.3	chaparral, cismontane woodland, lower montane coniferous forest. Inland from the coast.	No
Viola adunca	dog violet	-	-	-	-	-	coastal prairie, meadows	No
Viola palustris	marsh violet	2.2	-	-	G5	S1S2	coastal scrub (mesic), bogs & fens (coastal)	No

Table 2. Special-Status Plant Communities Listed in the California Natural Diversity Data Base (CNDDB).

Explanation of ranking:

G-RANK: Global Ranking - The global rank (G-rank) is a reflection of the overall condition of an element throughout its global range.

- G1 = Less than 6 viable element occurrences (Eos) OR less than 1,000 individuals OR less than 2,000 acres.
- G2 = 6-20 Eos OR 1,000-3,000 individuals OR 2,000-10,000 acres.
- G3 = 21-80 Eos OR 3,000-10,000 individuals OR 10,000-50,000 acres.
- G4 = Apparently secure; this rank is clearly lower than G3 but factors exist to cause some concern; i.e., there is some threat, or somewhat narrow habitat.
- G5 = Population or stand demonstrably secure to ineradicable due to being commonly found in the world.

S-RANK: STATE RANKING - The state rank (S-rank) is assigned much the same way as the global rank, except state ranks in California often also contain a threat designation attached to the S-rank.

- S1 = Less than 6 viable Eos OR less than 1,000 individuals OR less than 2,000 acres
  - S1.1 = very threatened
  - S1.2 = threatened
  - S1.3 = not very threatened OR no current threats known
- S2 = 6-20 Eos OR 1,000-3,000 individuals OR 2,000-10,000 acres
  - S2.1 = very threatened
  - S2.2 = threatened
  - S2.3 = not very threatened OR no current threats known
- S3 = 21-80 Eos or 3,000-10,000 individuals OR 10,000-50,000 acres
  - S3.1 = very threatened
  - S3.2 = threatened
  - S3.3 = not very threatened OR no current threats known
- S4 = Apparently secure within California; this rank is clearly lower than S3 but factors exist to cause some concern; i.e. there is some threat, or somewhat narrow habitat.
- S5 = Demonstrably secure to ineradicable in California. NO THREAT RANK.

Special-Status Plant Community	Ranking		Present on Site
	Global	State	
Grand Fir Forest	G1	S1.1	No
North Coast Black Cottonwood Riparian Forest	G1	S1.1	No
North Seagrass Bed	G1	S1.1	No
Northern Claypan Vernal Pool	G1	S1.1	No
Northern Foredune Grassland	G1	S1.1	No
Sitka Spruce Forest	G1	S1.1	No
North Embayment	G1	S1.2	No
North Eusaline Lagoon	G1	S1.2	No
North Mixosaline Lagoon	G1	S1.2	No
Fen	G2	S1.2	No
Northern Dune Scrub	G2	S1.2	No
Coastal Brackish Marsh	G2	S2.1	No
Coastal Chinook Salmon Stream	G2	S2.1	No
Coastal Coho Salmon Stream	G2	S2.1	No
Coastal Terrace Prairie	G2	S2.1	No
Ledum Swamp	G2	S2.1	No
Mendocino Pygmy Cypress Forest	G2	S2.1	No
North Mesosaline Estuary	G2	S2.1	No
North Mixosaline Estuary	G2	S2.1	No
North Oligosaline Estuary	G2	S2.1	No
Northern Foredunes	G2	S2.1	No
Freshwater Swamp	G2	S2.2	No
North Coast Alluvial Redwood Forest	G2	S2.2	No
North Cobble Intertidal	G2	S2.2	No
North Cobble Shore	G2	S2.2	No

	Ranking		
North Rock Intertidal	G2	S2.2	No
Northern Bishop Pine Forest	G2	S2.2	No
Northern Coastal Bluff Scrub	G2	S2.2	No
Wildflower Field	G2	S2.2	No
Sphagnum Bog	G3	S1.2	No
Active Coastal Dunes	G3	S2.2	No
Red Alder Riparian Forest	G3	S2.2	No
Northern Silk Tassel Scrub	G3	S2.3	No
Sitka Spruce Grand Fir Forest	G4	S1.1	No
Beach Pine Forest	G4	S2.1	No
Coastal Douglas Fir Western Hemlock Forest	G4	S2.1	No
Native Grassland	G3	S3.1	No
Northern Hardpan Vernal Pool	G3	S3.1	No
Upland Redwood Forest	G3	S2.3	Yes
California Bay Forest	G3	S3.2	No
Coastal Steelhead Trout Stream	G3	S3.2	No
North Coast Riparian Scrub	G3	S3.2	No
North/Central Dune Lake	G3	S3.2	No
Northern Coastal Salt Marsh	G3	S3.2	No
Silk Tassel Forest	G3	S3.2	No
Woodwardia Thicket	G3	S3.2	No
Bush Chinquapin Chaparral	G3	S3.3	No
North Mud Intertidal	G3	S3.3	No
North Sand Intertidal	G3	S3.3	No
Poison Oak Chaparral	G3	S3.3	No
Upland Douglas-fir Forest	G4	S3.1	No
Freshwater Seep	G4	S3.2	No
Northern Salal Scrub	G4	S3.2	No
Red Alder Forest	G4	S3.2	No
Blue Brush Chaparral	G4	S4	No
Mixed North Slope Forest	G4	S4	No
Non Native Grassland	G4	S4	No
Northern Coyote Bush Scrub	G4	S4	No
Tan Oak Forest	G4	S4	No
North Rock Shore	G4	S4.3	No
North Sand Shore	G4	S4.3	No
Artificial Habitat	G?	S?	No
N. Central Coast Calif. Roach/Stickleback/Steelhead Stream	G?	S?	No
Northern Claypan Vernal Pool	G?	S?	No

5.0 Survey Results

5.1 Documented Occurrences

The special-status plants, communities, and wetlands with regional known occurrence having potential habitat in the project site were surveyed for presence (Tables 1 and 2). Species without potential habitat in the Project Site were considered and surveyed for, but surveys were focused on those with potential habitat. The survey results of detected special-status species were recorded (Table 3) and drawn on a map of the Project Site (Appendix A). Species that are listed in Tables 1 and 2 but not below in Table 3 were not detected.

Table 3. Special-Status Plant Communities Documented on the Project Site.

Scientific Name	Common Name	Status	ESHA
-	upland redwood forest	G3 / S2.3	No

The north and northwestern portion of the parcel is sloping toward a small drainage that feeds into Quinliven Gulch, which runs to the Pacific Ocean just south of the town of Anchor Bay. The forest on this portion of the parcel is mostly redwood with some tanoak and Douglas-fir, with a shrub layer of huckleberry, manzanita, and sapling tanoaks.

5.2 Floristic Survey

A floristic survey was completed for the surveyed area; all plants encountered were documented (Appendix A). Taxonomy follows *The Jepson Manual* (Hickman 1993).

5.3 Vegetation Removal

The extent of the vegetation removal was evaluated under the LCP's definition of "Major Vegetation Removal" (Sec. 20.608.032) in Table 4 below.

Table 4. Sec. 20.608.032 Definitions (M) [Major Vegetation Removal]

(C) "Major Vegetation, Removal or Harvesting" shall be defined to include one or more of the following:

(1) The removal of more than fifteen (15) trees or ten (10) percent of the total number of trees on the parcel, whichever is less, with a circumference of thirty-eight (38) inches or more measured at four and one-half (4 1/2) feet vertically above the ground; or

The applicant reports that no trees greater than approximately 8" dbh were removed from the property. The applicant reports removing an estimated 3 bishop pine, 6 fir (likely Douglas-fir), and about 15 dead or dying bishop pine in 2008.

(2) The removal of trees within a total contiguous ground area of six thousand (6,000) square feet, or within a non-contiguous area or areas not exceeding a total of six thousand (6,000) square feet measured as the area located directly beneath the tree canopy; or

To assess the spatial extent of the cleared area prior to the recent vegetation removal, results from field surveys in 2009 were compared with aerial photographs from 1993 and 2005 in a GIS (geographic information system). In 2009, geographic points, accurate to within approximately 6-12', were collected using a GPS along the perimeter of the cleared area and the canopy edge of the stands of remaining trees. These points were then overlaid on the aerial photographs in GIS and cleared areas were calculated. To establish site conditions prior to 2009, the distinguishably non-vegetated areas on 1993 and 2005 aerial photographs were outlined and square footage was calculated in GIS and rounded to the nearest 100 square feet. Results of the calculations are given below.

Year from which Areas of Cleared Vegetation Calculated	Area (ft^2)
Cleared/Open Area 1993	3,600
Cleared/Open Area 2005	12,500
Cleared Area 2009 (excluding remaining stands of trees)	17,700
Increase in cleared area from 2005 to 2009	5,200

The total area of vegetation clearing done in 2008 is calculated to be less than 6,000 ft^2. Although these numbers are estimates from aerial photograph interpretation and GPS locations, the actual area located directly beneath the tree canopy is likely less than 5,200 ft^2 because the cleared area was not entirely covered with trees as reported from the applicant and as interpreted from the 2005 aerial photograph (See Figure 4, callout text to circle.).

(3) The Planning and Building Services Director may determine that a proposal to remove vegetation constitutes major vegetation removal if the Planning and Building Services Director finds that it may result in a significant impact. In making a finding that the proposed major vegetation removal may result in a significant impact, the Planning and Building Services Director shall review the proposal and determine if any of the following conditions exist or are proposed:

Table 4. Sec. 20.608.032 Definitions (M) [Major Vegetation Removal]
(a) The vegetation removal involves the use of heavy equipment; Trees and brush were removed with a backhoe and stacked for winter burning.
(b) The vegetation removal is proposed on a steep slope (fifteen (15) percent or greater) and removal of vegetation may result in soil erosion or landslide; The vegetation removal occurred over land that is generally sloped at 10% as determined from the topographic contours. The area on the parcel with the steepest slopes did not have any vegetation removed. Paoli (2009) visited the site twice in February 2009, each after heavy rains, and noted no erosion. Several months later, during the botanical survey site visits, no erosion in the cleared area was noted.
(c) The vegetation removal is located within or adjacent to an environmentally sensitive habitat; or No (ESHAs) were documented adjacent to or on the parcel.
(d) The vegetation removal may result in significant exposure of adjacent trees to wind damage; or The removal has resulted in an average distance of approximately 40' or less between the remaining trees and other vegetation on the perimeter and the small stands of trees in the middle of the meadow. Because other forest openings from the roads and clearing around the adjacent parcel already exists and there is no apparent damage to the trees from wind exposure, it dos not appear that the vegetation removal will result in any future tree damage from wind exposure. More importantly, since 2005, at least the eastern half of the cleared area was not vegetated with trees as seen from aerial photographs, and there is no apparent damage to trees from exposure to wind.
(e) The vegetation removal may result in significant degradation of the viewshed. The remaining vegetation on the perimeter of the clearing makes for a 25-40' vegetative screen along the roads, and to the north there is a 100-120' densely wooded buffer. The site is only highly visible from the parcel to the east, and possibly somewhat visible from the parcel to the south, but not from any scenic highways or areas of high traffic, including State Highway 1.
(f) The removal of one (1) or more trees which measure twenty-four (24) inches or more in diameter at breast height and which are visually or historically significant, exemplary of their species, or ecologically significant. According to the applicant, no tree greater than approximately 8" diameter was removed. Bishop pine and Douglas-fir of this size, or even twice this size, would likely not be visually or historically significant and would not be large enough to be notable specimens. No rare plants or vegetation communities or presence of rare animals were found in the area adjacent to the clearing. Red tree vole nests were searched for in the adjacent conifers but none were documented. Although no plant surveys of the site prior to vegetation clearing were completed, the cleared vegetation is reported by the applicant to have been of similar type to the existing vegetation on the perimeter of the clearing. This account appears to be correct based on the uniformity of the vegetation throughout the flatter areas of the parcel. Only on the northern portion of the parcel is it slightly steeper and covered more densely in larger diameter redwoods.

Table 4. Sec. 20.608.032 Definitions (M) [Major Vegetation Removal]
(4) "Exempt from this definition would be one (1) or more of the following:
(a) Removal of trees and other vegetation that have been reviewed and approved in conjunction with an associated development which has been granted a coastal development permit; or No coastal development permit has been granted.
(b) Removal or harvesting of vegetation for agricultural purposes in areas presently used for agriculture; or Vegetation was not removed or harvested for agricultural purposes, nor is the area presently used for agriculture.
(c) Kelp harvesting; or Not applicable.
(d) Timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provisions of the Z'berg-Nejedly Forest Practice Act of 1973 (commencing with Section 4511)." No timber operations were proposed for the property.

6.0 Discussion and Mitigation

The upland redwood forest occurring on the northern portion of the parcel is outside of the building envelope and will not result in any impact to the integrity of the forest – no trees are proposed for removal nor is any clearing in the area proposed.

After analyzing the available information regarding the clearing of vegetation on the parcel, including the applicant's verbal account, aerial photographs, and boundaries of remaining vegetation, it was concluded that the vegetation did not result in what the County considers "Major Vegetation Removal" under Sec. 20.608.032 of the LCP. The total area of vegetation clearing done in 2008 is calculated to be less than 6,000 ft^2. These calculations are not without errors introduced in the collection of geographic points from GPS satellites and interpretation of aerial photographs with 1 meter resolution. However, the total area of vegetation removal in 2008 (5,200 ft^2) may be less because the cleared area was not entirely covered with trees as reported from the applicant and as interpreted from the 1993 aerial photograph (See Figure 4, callout text to circle.)

No ESHA's were documented within 100' of the proposed building envelope or elsewhere on the parcel. Therefore there is no anticipated impact to any ESHA.

Because any residential development in the Coastal Zone can be accompanied by landscaping with plants that can become weedy and later become established in creeks, wildlands, parks, and elsewhere in the watershed, it is recommended that the following condition of landscaping without invasive non-native plants be followed.

> Condition 1: Planting of invasive landscaping plants will not occur.
> Landscaping will not include any of the invasive plants that are commonly used in landscaping. They include the following species (Cal-IPC, 2006).
>
> blue gum eucalyptus (*Eucalyptus globulus*)
> jubatagrass or pampasgrass (*Cortaderia jubata* or *Cortaderia selloana*)
> ivies: English ivy, Algerian ivy, or cape ivy (*Hedera canariensis, Delairea odorata* or *Hedera helix*)
> periwinkle (*Vinca major*)
> cotoneaster (*Cotoneaster lacteus* or *Cotoneaster parnosus*)
> Brooms: Bridal broom, French broom, Portuguese broom, Scotch broom or Spanish broom (*Retama monosperma, Genista monspessulana, Cytisus striatus, Cytisus scoparius* or *Spartium junceum*)

REFERENCES

California Department of Fish and Game (CDFG). 2000. "Guidelines for Assessing the Effects of Proposed Developments on Rare, Threatened, and Endangered Plants and Plant Communities." Developed by James Nelson. Sacramento, California.

California Department of Fish and Game, Wildlife and Habitat Data Analysis Branch (CDFG). May 2003 Edition. California Natural Diversity Database, List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database.

California Department of Fish and Game (CDFG). 2009. Habitat Conservation Division. Natural Diversity Data Base. Rare Find 3.

California Invasive Plant Council (Cal-IPC). "Responsible Landscaping." 2006. http:www.cal-ipc.org

California Native Plant Society (CNPS). 2009. Inventory of Rare and Endangered Plants (online edition, v7). California Native Plant Society. Sacramento, CA. from http://www.cnps.org/inventory

Hickman, James C., Ed. 1993. The Jepson Manual: Higher Plants of California. University of California Press. Berkeley, California.

Mendocino County. 1985 (Revised 1991). Mendocino County General Plan Coastal Element.

Mendocino County. 1991. Mendocino County Coastal Zoning Code. Title 20 – Division II of the Mendocino County Code.

Natural Resource Conservation Service. 2001. Mendocino County Soil Survey, Western Part.

Paoli Engineering & Surveying. February 24, 2009. Letter to County of Mendocino.

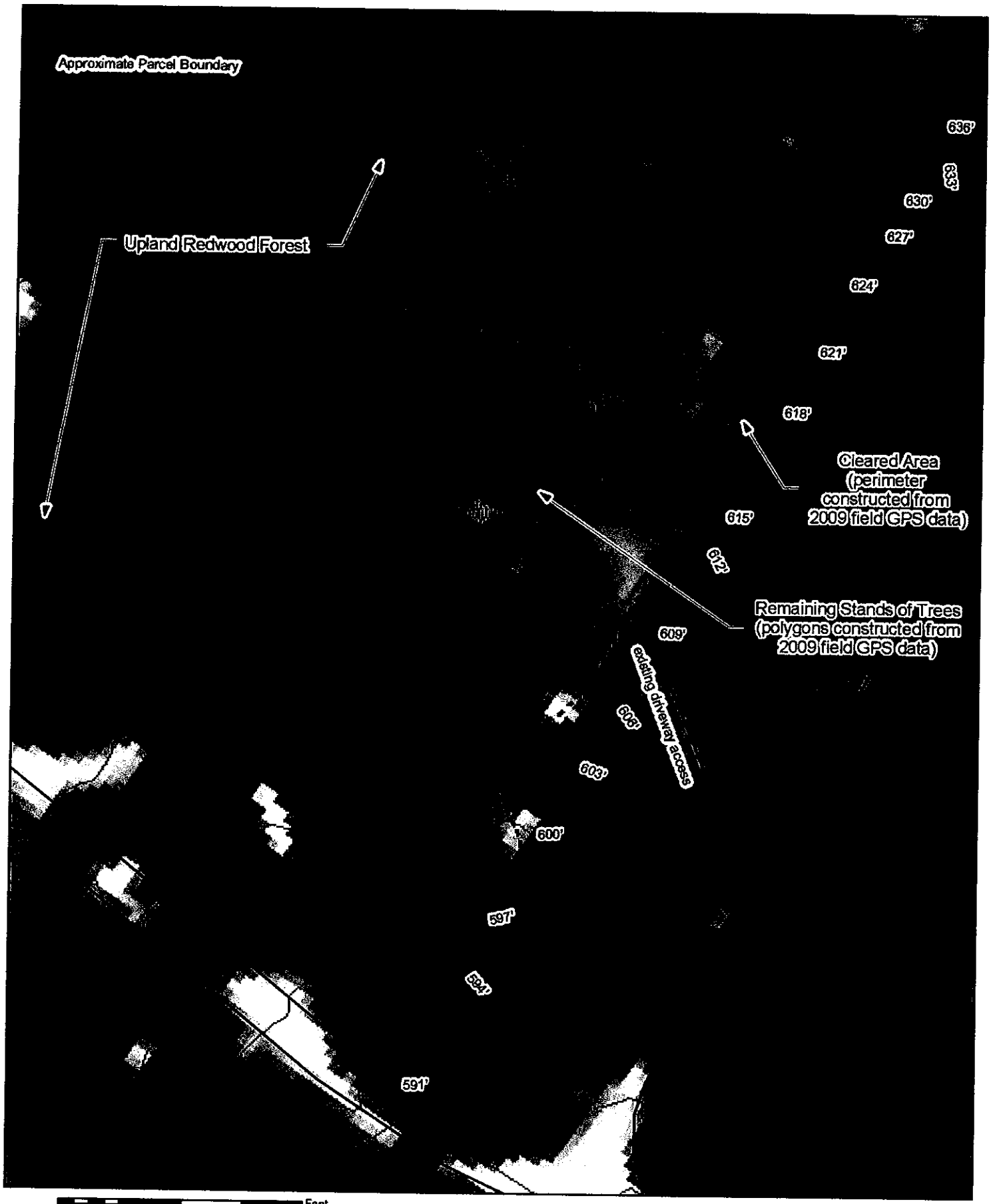
APPENDICES

Appendix A. Figures and Maps.

Figure 1. Photograph of Cleared Area, 2009.
Figure 2. Site Map.
Figure 3. Cleared/Open Areas, 1993.
Figure 4. Cleared/Open Areas, 2005 and 2009.

Appendix B. List of Plant Species Documented in the Study Area

Figure 1. Photograph of Cleared Area, 2009. The site is an open meadow with some small stands of redwood and tanoak surrounded by a mix of redwood, tanoak, and Douglas-fir.

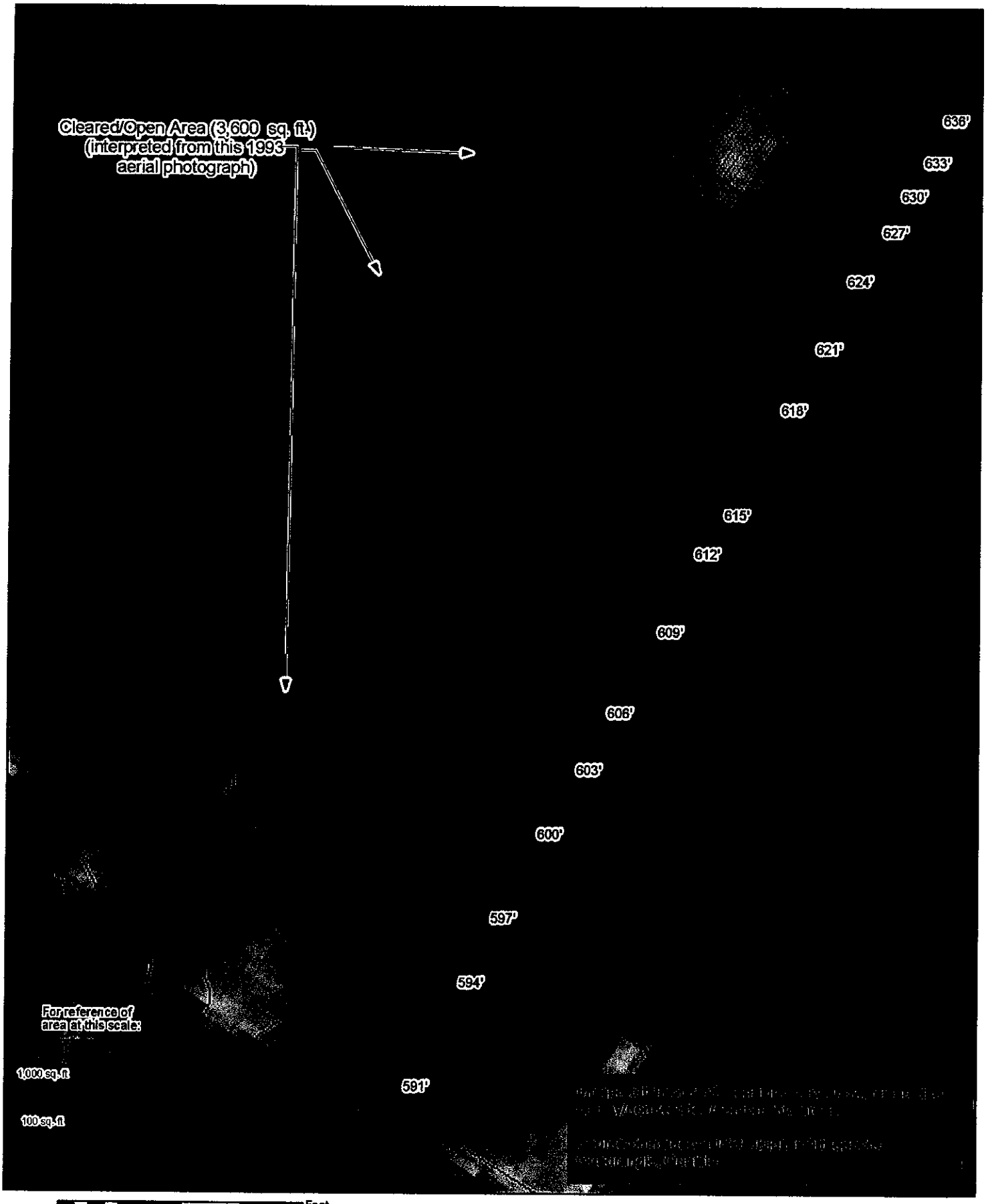


0 10 20 40 60 80 Feet

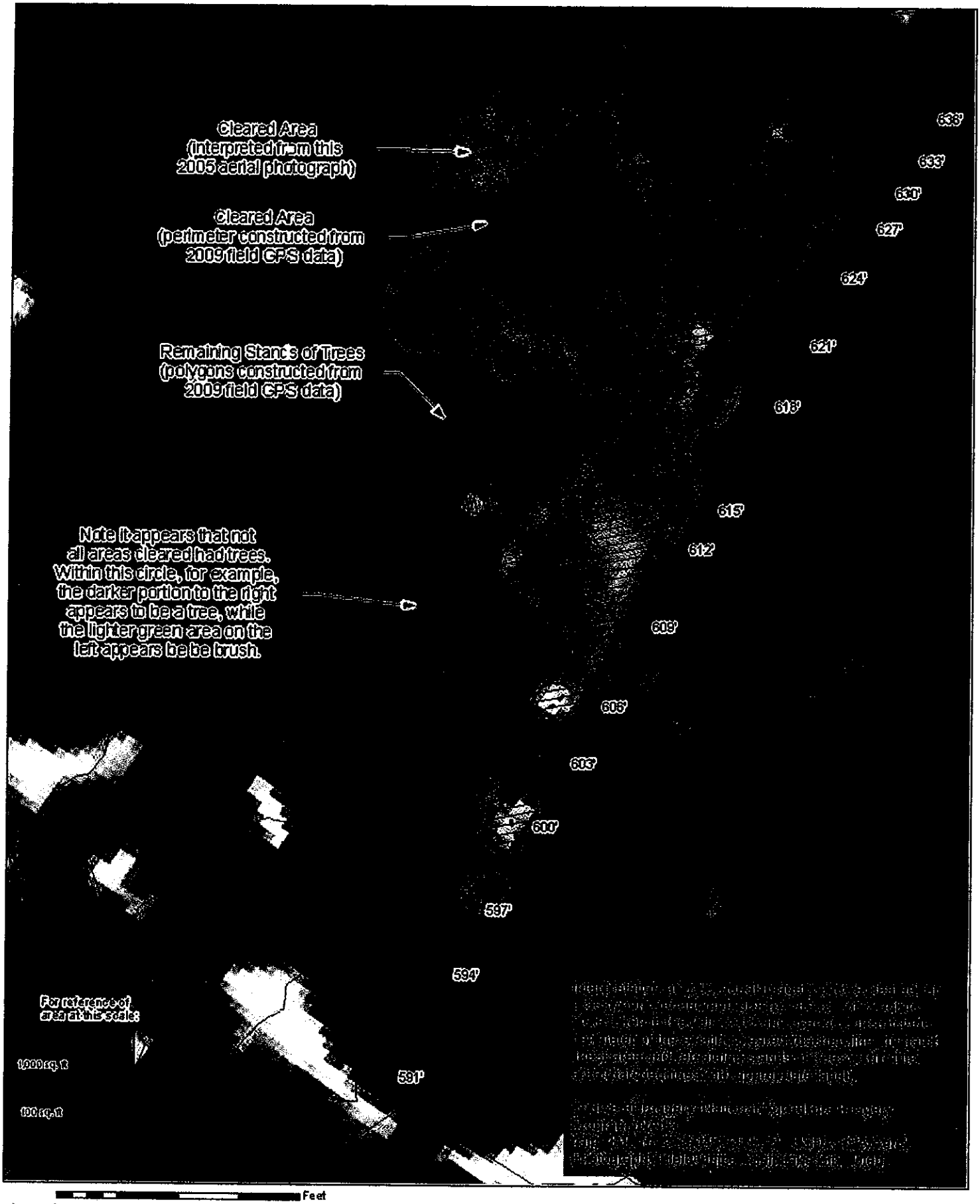
1 inch equals 40 feet

1:480

Site Map.
Building envelope is suitable for any location within the dashed line.



Cleared/Open Aeas, 1993.



Cleared Aeas, 2005 and 2009.

Appendix B. List of Plant Species Documented in the Study Area.

GROUP	FAMILY	SCIENTIFIC NAME	COMMON NAME	NATIVE
FERNS AND ALLIES				
	Dennstaedtiaceae			
		Pteridium aquilinum var. pubescens	bracken	Y
GYMNOSPERMS				
	Pinaceae			
		Pinus muricata	bishop pine	Y
		Pseudotsuga menziesii var. menziesii	Douglas-fir	Y
	Taxodiaceae			
		Sequoia sempervirens	coast redwood	Y
DICOTS				
	Apiaceae			
		Sanicula laciniata	coast sanicle	Y
	Asteraceae			
		Arnica discoidea		Y
		Baccharis pilularis	coyote brush	Y
		Eriophyllum lanatum var. arachnoideum	spiderweb sunflower	Y
		Gnaphalium purpureum	purple everlasting	Y
		Hieracium albiflorum	white-flowered hawkweed	Y
		Hypochaeris glabra	smooth cat's ear	N
		Hypochaeris radicata	rough cat's ear, hairy cat's ear	N
		Madia madioides	woodland madia	Y
	Caprifoliaccac			
		Lonicera hispidula var. vacillans	hairy honeysuckle	Y
	Ericaceae			
		Arctostaphylos glandulosa ssp. glandulosa		Y
		Arctostaphylos nummularia	glossy-leaved manzanita	Y
		Gaultheria shallon	salal	Y
		Vaccinium ovatum	California huckleberry	Y
	Fabaceae			
		Lotus junceus var. junceus		Y
	Fagaceae			
		Chrysolepis chrysophylla var. chrysophylla	giant chinquapin	Y
	Lamiaceae			
		Stachys ajugoides var. rigida	rigid hedge-nettle	Y
	Philadelphaceae			
		Whipplea modesta	yerba de selva	Y
	Polemoniaceae			
		Collomia heterophylla		Y
	Scrophulariaceae			
		Mimulus aurantiacus	sticky monkeyflower	Y
	Violaceae			
		Viola sempervirens	redwood violet	Y
MONOCOTS				
	Juncaceae			
		Luzula comosa	hairy wood rush	Y
	Liliaceae			
		Clintonia andrewsiana	blue-bead lily	Y
		Zigadenus fremontii	Fremont's death-camas	Y

GROUP	FAMILY	SCIENTIFIC NAME	COMMON NAME	NATIVE
	Poaceae			
		Aira caryophyllea	silver European hairgrass	N
		Aira praecox	yellow hairgrass, little hairgrass	N
		Festuca subuliflora	crinckle-awn fescue	Y
		Hierochloe occidentalis	vanilla grass	Y
		Lolium perenne	English ryegrass	N
		Vulpia myuros	rattail fescue	N