

September 7, 2020

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RE: Biological and Arborist Reports for “1900 East Ave,” PLN2014-00490

Dear Members of the Coastside Design Review Committee, Ms. Leung and Mr. Panglao,

I write regarding the certification of a Design Review Permit for the proposed residence and driveway at the end of 14th Street in Montara. I first became aware of this project last week on August 31, 2020, when a physical “Notice of Coastside Design Review” was posted at the site of the proposed private driveway.

I am a life-long naturalist and a plant and mushroom identification expert. My passion for plants and mushrooms led me to establish Morchella Wild Foods in 2015, and I have been a professional forager full-time for more than five years. I live in Montara, so I am especially familiar with the ecology of this area.

California’s coastal fog belt is the most biodiverse part of our state, a narrow band of habitat that occurs only where summer fog brings moisture to the flora during otherwise dry months. The year-round moisture and mild temperatures result in rich soil and ecological diversity. Coastal forests here are comprised of Monterey pine and Monterey cypress, trees native to California and designated vulnerable/endangered by IUCN and the California Native Plant Society due to their small native ranges and susceptibility to disease and climate shifts.¹ These forests are host to many native plant and mushroom communities.

¹ Although these trees are outside the handful of small groves that are considered their *current* native ranges, they are well within the range that they would have been native in recent geologic history. Dr. Connie Millar, a Senior Research Ecologist with the US Forest Service who studied the evolution of Monterey pine and shifts in its distribution during periods of climatic change, recommends expanding conservation efforts beyond the five current native populations to help ensure the survival of genetically diverse forests. See Millar, C. I. 1998 “Reconsidering the Conservation of Monterey Pine” *Fremontia* 26(3):12-16 and Perry, Frank 2004 “The Monterey Pine through geologic time,” http://evolution.berkeley.edu/evolibrary/article/montereypine_01, accessed 9/6/20.

The purpose of this letter is my concern with the planned development at “1900 East Ave.” I have reviewed the biological reports² and arborist report³ commissioned by Paul McGregor and the related correspondence. I noticed errors and omissions regarding adverse impacts to native fungi, the California red-legged frog, and native forest.

Attached is a map of the driveway plan for this project, with the locations of native mushroom patches labeled (Attachment 1). The mushroom species at issue are the following: saffron milkcap (*Lactarius deliciosus*), fly agaric (*Amanita muscaria*), slippery jack (*Suillus pungens*), rosy russula (*Russula sanguinea*), king bolete (*Boletus edulis* var. *grandedulis*), and bleeding brown agaricus (*Agaricus brunneofibrillosus*). Also attached are photos I have taken of some of the mushrooms in these locations (Attachment 2). Mushroom patches such as these are not common or temporary; they are special places and important fixtures in our coastal ecology. However, there is no mention of fungi or mushrooms of any kind in the biological reports commissioned by Mr. McGregor.

These native mushroom species are both ecologically important and culturally relevant. They are mycorrhizal (or symbiotic) with the roots of Monterey pine, exchanging nutrients for sugars in an association that is good for the health of the trees and helps them resist pathogens such as pine pitch canker. King boletes and saffron milkcaps are prized edible mushrooms and economically valuable, renewable natural resources. The bleeding brown agaricus occurs only with Monterey cypress along our little stretch of coast, mostly in a small range from San Francisco to Monterey County. The omission of these fungi from the biological reports shows that the full ecological impacts of this project have not been explored.

I am also concerned about the impact to the California red-legged frog (*Rana draytonii*), a federally recognized threatened species, CDFW species of special concern, and an IUCN vulnerable species. With regard to this frog, the biological report commissioned by Mr. McGregor and prepared by Sol Ecology states:

CRLF has been documented in Montara Creek in a pool located approximately 0.75 mile east (upstream) of the project site; both adults and juveniles were observed indicating Montara Creek provides suitable breeding habitat for CRLF. Given the project site is within the known dispersal distance from this occurrence and Montara Creek, there is potential for CRLF to disperse on to the site. However, no suitable aquatic or upland habitat (breeding or non-breeding habitat) is present.⁴

On April 12, 2020, I observed a California red-legged frog at the end of 14th Street. It was at the edge of the county road, about 500 feet north of Montara Creek and less than 150 feet directly uphill from the proposed development. This was during the time of year that these frogs disperse to upland habitat. My observation contradicts Sol Ecology’s assertion that “no suitable aquatic or

² Letters from Dana Riggs, Sol Ecology, to Paul McGregor dated 12/13/17, 10/25/18, and 6/23/20.

³ “Arborist Report and Tree Protection Plan,” 1/11/19, prepared by Roy C. Leggitt III of Tree Management Experts for Paul McGregor.

⁴ Letter from Dana Riggs, Sol Ecology, to Paul McGregor dated 12/13/17.

upland habitat is present.” The location of the frog I observed is shown on the map in Attachment 1, and a photo of the frog is attached below (Attachment 3).

Lastly, I am concerned about the removal of native forest. The removal of 18 significant native trees, as posted, understates the amount of forest that will be lost if this project proceeds. There are at least a dozen additional, large and healthy Monterey pines in the proposed path of the driveway that are not included in the arborist’s report, presumably due to their insufficient diameters. These are labeled below on the map in Attachment 1. There are also several “protected trees” in the arborist’s report that would likely be killed during grading and construction well within their driplines, despite the proposed mitigations. These trees are Monterey pines #1, #2, #3, #4, #8, and #17, and the 40” Monterey cypress #5.⁵

Regarding the 40” Monterey cypress, County Arborist Daniel Krugg wrote in an email that “compaction of the road surface and subgrade will also have a negative impact to the tree. Root compaction will occur within the dripline during construction of the driveway, regardless of the depth of grading, compaction within this area will have impact to the tree, only time will tell what the level of impact will be.” In the same email, he goes on to propose the use of “a pneumatic air tool” and “geotextile fabrics” as mitigation because these “**could be perceived as a reasonable effort** to preserve the tree as requested by the MCC” (emphasis added).⁶ Mr. Krugg’s words do not inspire confidence that this tree would survive construction. Instead, they indicate the perfunctory nature of the proposed mitigations.

While native fungi, the California red-legged frog, and native forest are my specific environmental concerns, I am also personally concerned by the following:

- I understand that the property owner Mr. McGregor is a developer and therefore this house would not be his residence. His short-term financial interest should not be prioritized over the long-term implications for our community and the surrounding environment. These actions would adversely affect my family and neighbors who actually live here, as well as wildlife and future generations of Montarans who have no voice in this decision. Once this wild land is lost, it is lost forever.
- The trees proposed for removal are visible from our home, and a significant part of the beauty and character of our street. Our proximity to native forest is a large part of why we moved here. From our windows we watch both resident and migratory birds land and nest in these trees. Cutting down at least 30 native trees is a shocking amount of native forest to remove for one man’s profit.
- The construction of a *private* driveway on the unimproved *public* right-of-way. As designed this project would claim public right-of-way for the private use of a single house.

⁵ “Arborist Report and Tree Protection Plan,” 1/11/19, prepared by Roy C. Leggitt III of Tree Management Experts for Paul McGregor.

⁶ Email from Daniel Krugg, County Arborist, to Camille Leung dated 1/2/19, found in Attachment I to the Mitigated Negative Declaration

- While the address of this property has been described alternatively as “15th Street and East Ave,” and “1900 East Ave,” neither of these roads nor this address exists. East Avenue ends 5 blocks to the north at the intersection with 10th Street, and “15th Street” is an undeveloped public right-of-way that is completely wild without so much as a trail. In reality, this property would be accessed from 14th Street, the nearest county road. It would be the only house on 14th Street that is not adjacent to any county road. Its design is unprecedented and out of character with 14th Street and the town of Montara.

In conclusion, the biological reports commissioned by Mr. McGregor contain errors and omissions at least with regard to native fungi, forest, and protected California red-legged frog habitat that would be adversely impacted by this proposal. I urge you to give appropriate weight to the concerns of the residents living in this area who have no financial stake in this project, only love for the character of our community and for the environment and wildlife we share it with.

Sincerely,

Bryan Jessop
387 14th St, Montara

Some of the resources and reference guides I used in preparing this correspondence include:

Mitigated Negative Declaration for McGregor Residence and Driveway, and Attachments A – J, <https://planning.smcgov.org/ceqa-document/mitigated-negative-declaration-mcgregor-residence-and-driveway>, accessed 9/6/20

Calflora database (<https://www.calflora.org/>)

iNaturalist database (<https://www.inaturalist.org/>)

Tending the Wild by Kat Anderson

California Foraging by Judith Lowry

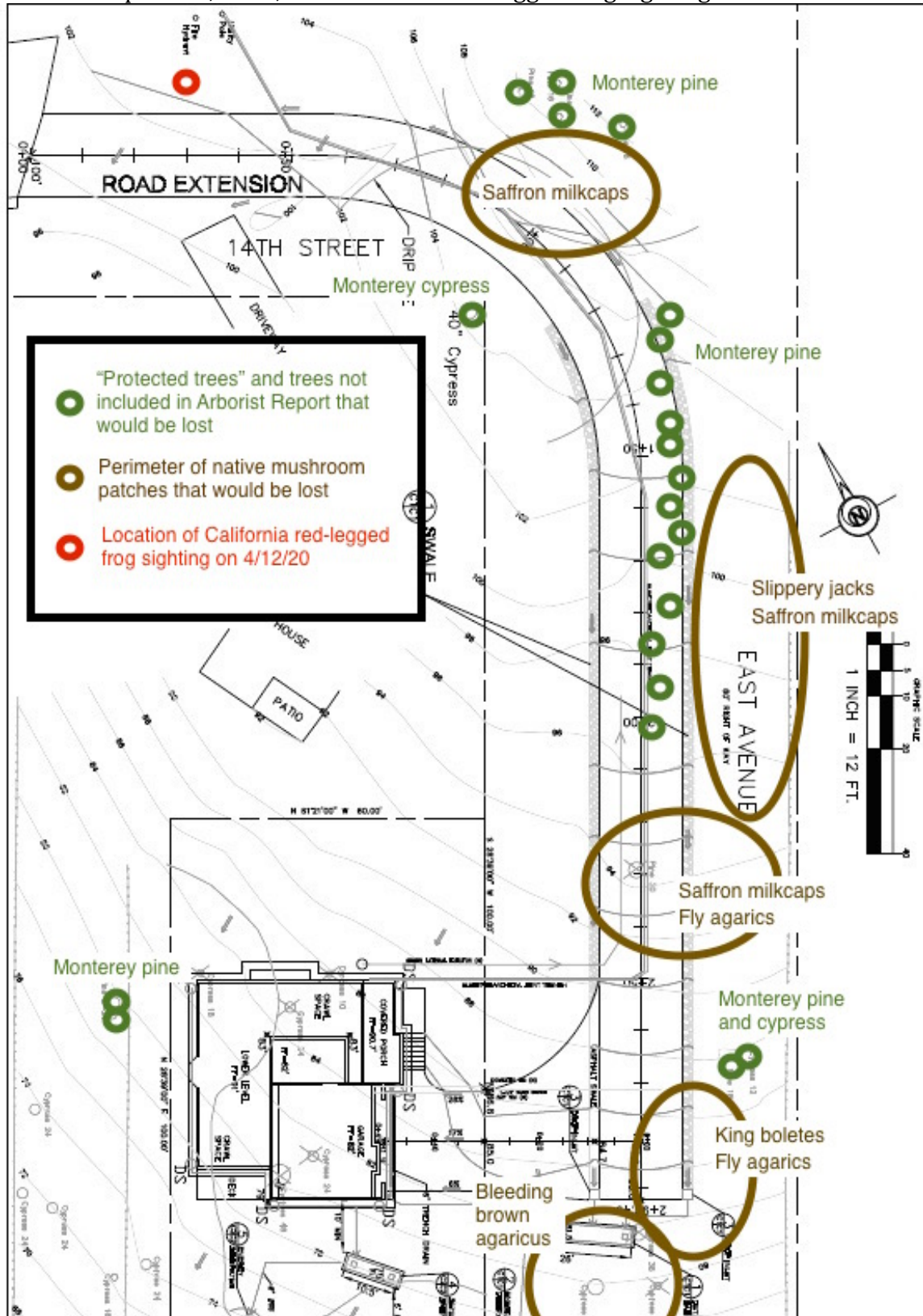
Mushrooms of the Redwood Coast by Noah Siegel and Christian Schwarz

Mushrooms Demystified by David Arora

Millar, C. I. 1998 “Reconsidering the Conservation of Monterey Pine,” *Fremontia* 26(3):12-16

Perry, Frank 2004 “The Monterey Pine through geologic time,” http://evolution.berkeley.edu/evolibrary/article/montereypine_01, accessed 9/6/20

Attachment 1: Map of the proposed residence and driveway with locations of native mushroom patches, trees, and California red-legged frog sighting



Attachment 2: Photos of mushrooms from patches that would be destroyed. Clockwise from top left: fly agaric, king bolete, bleeding brown agaricus, saffron milkcap.



Attachment 3: A California red-legged frog (*Rana draytonii*), observed April 12, 2020 on 14th Street

