

March 17, 2022

Jonna Alexander Green
Bollinas Eucalyptus Project
38 Dogwood Road
Bollinas CA 94924
jonnaalexandergreen@gmail.com

RE: Bollinas Eucalyptus Project Pre-application
Privately owned properties at 10, 20, and 30 Mesa Road and a property owned by Bollinas
Community Public Utility District along Mesa Road, Bollinas
Assessor's Parcel 193-020-61, -41, -25, and 193-030-38
Project ID P3413

Dear Jonna Alexander Green,

In response to your pre-application, I have reviewed the above-referenced properties and proposed request concerning conformance with the Marin Countywide Plan (CWP) policies, regulations, and standards, the Marin County Local Coastal Program Land Use Plan policies and the Marin County Local Coastal Program Implementation Plan. This letter summarizes the Planning Division's comments regarding permit requirements, plan consistency and development issues and also includes preliminary comments from the California Coastal Commission. These comments relate to the general information provided with your pre-application; other issues may arise after more specific materials are submitted with permit applications.

Your pre-application submittal was transmitted to the following agencies: County of Marin Department of Public Works, Land Development; California Coastal Commission; and, Bollinas Community Public Utility District. The comments received are attached for your review.

PROJECT SUMMARY

Based on your pre-application materials, I understand the project would entail the removal of a stand of approximately 700 Eucalyptus trees. New native plant restoration would occur within the 12-acre area consisting of several properties along Mesa Road in Bollinas. The project is proposed to improve existing emergency evacuation routes along Mesa Road in Bollinas.

PROJECT SITE BACKGROUND AND EXISTING CONDITIONS

The project site is located in the community of Bollinas and compasses 10, 20, and 30 Mesa Road and a property owned by Bollinas Community Public Utility District along Mesa Road. The project site consists of Assessor's Parcel Numbers (APN) 193-020-61, -41, -25, and 193-030-38. The properties at 10, 20, and 30 Mesa Road are developed with single family residences and the project site is undeveloped near the area of proposed tree removal on the Bollinas Community Public Utility District property. The project site includes a stand of blue gum eucalyptus

(*Eucalyptus globulus*) trees. They range in size from small trees in the 12-inch diameter range to very large trees with trunk diameters over four feet and are more than 150 feet in height.

The County GIS Database provides the following information:

1. The project site is located within a Moderate Fire Severity Zone;
2. The project site is located within an Urban Wildland Interface;
3. The project site is located within the Coastal Corridor;
4. The project site is located not within the Ridge and Upland Greenbelt (RUG);
5. The project site is located in Zone 1 for low seismic shaking;
6. The project site is located in an area of landslides;
7. The project site is located within a California Ridgeway's rail buffer;
8. The project site is located within a Monarch Butterfly buffer; and,
9. The project site could contain an ephemeral stream.

The grove of eucalyptus on the subject properties may have the potential to support habitat for rare or endangered species. Therefore, the grove of eucalyptus or a portion of the grove could be considered an Environmentally Sensitive Habitat Areas (ESHAs). An ESHA is any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments. The presence of an ESHA would require compliance with Marin County Local Coastal Program discussed in more detail below.

COUNTYWIDE PLAN DESIGNATION AND ZONING REQUIREMENTS

The CWP is the governing general plan for the unincorporated areas of the County and establishes goals, policies, and programs that govern existing and future land uses and developments. The CWP also includes adopted community area plans as they pertain to specific unincorporated communities. The property is in Bolinas and within the Coastal Corridor, which is primarily designated for federal parklands, recreational uses, agriculture, and the preservation of existing small coastal communities.

Existing CWP Land Use Designation

The project site is Countywide Plan's land use designation is C-AG-2 (Agricultural, 1 unit/10-30 acres). The CWP includes policies that are intended to protect existing vegetation and animal habitats, maintain unique geological, ecological, and archaeological sites, and preserve streams and riparian systems, and shorelines. The policies encourage development to be designed and sited to minimize tree removal, avoid hazards from earthquake, erosion, landslides, floods, and fire, and minimize excavating, grading, and filling. It is my understanding that your proposal only includes tree removal and replanting. Tree removal would not trigger an entitlement that would be subject to CWP policies, therefore, CWP policies, and zoning regulations are not further discussed.

MARIN COUNTY LOCAL COASTAL PROGRAM

The Marin County Local Coastal Program (LCP) is comprised of a land use plan and implementation plan for the County's coastal areas from Olema north to the Sonoma-Marin County border. The LCP was mandated by the California Coastal Act of 1976 which established a statewide coastal management program to ensure that coastal resources are properly utilized and protected. The Marin County LCP-Implementation Plan contains policies that are intended to protect and promote public access to the County's coastal areas, promote and encourage recreation and visitor serving facilities, protect, maintain and promote appropriate development

and access to federal parklands, protect resources including streams and riparian habitats, wetlands and coastal dunes and agricultural lands, and ensure adequate and appropriate public services as well as land use and new development.

Land Use Plan

There are several policies contained in the Biological Resources section of the Marin County Land Use Plan that may apply to the project. The relevant policies are summarized below.

- Policy C-BIO-1 Environmentally Sensitive Habitat Areas (ESHAs), states the following, "...Environmentally Sensitive Habitat Areas (ESHAs). An environmentally sensitive habitat area (ESHA) is any area which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments...ESHA consist of three general categories: wetlands, streams and riparian vegetation, and terrestrial ESHAs. Terrestrial ESHA include non-aquatic habitats that support rare and endangered species...coastal dunes...roosting and nesting habitats...and riparian vegetation that is not associated with a perennial or intermittent stream..."
- Policy C-BIO-2 ESHA Projection, states "Protect ESHAs against disruption of habitat values...Disruption of habitat values includes when the physical habitat is significantly altered or when species diversity or the abundance or viability of species populations is reduced..."
- Policy C-BIO-4: Protect Major Vegetation. Require a Coastal Permit for the removal or harvesting of major vegetation other than for agricultural purposes. Such major vegetation removal shall avoid ESHA, ESHA buffers, coastal waters, and public views, and shall not conflict with prior conditions of approval.
- Policy C-BIO-5: Ecological Restoration. Encourage the restoration and enhancement of degraded ESHAs and the creation of new ESHAs, and streamline regulatory processes whenever possible to facilitate the successful completion of restoration projects.
- Policy C-BIO-6: Invasive Plants. Where feasible, require the removal of non-native, invasive plant species such as pampas grass, brooms, iceplant, thistles and other invasive plant species on the list maintained by the California Invasive Plant Council in the areas of development and revegetate those areas with native plants as specified in Coastal Permit approvals. Ensure that required landscaping avoids use of non-native, invasive trees and plants in accordance with Policy C-DES-9 Landscaping.
- Policy C-BIO-10: Roosting and Nesting Habitat. Prohibit the alteration or removal of groves of trees that provide colonial nesting and roosting habitat for monarch butterflies or other wildlife, except where the trees pose a threat to life or property.
- Policy C-DES-8: Protection of Trees. Site structures and roads to avoid removal of trees that contribute to the area's scenic and visual resources, except where required to maintain defensible space for structures or eliminate diseased trees that threaten surrounding structures or vegetation and where removal is otherwise consistent with LCP policies. Dead trees may serve as valuable habitat for some species, so avoid complete removal where appropriate.

- Policy C-DES-9: Landscaping: Ensure that required landscaping uses native species of trees and plants and avoids using non-native, invasive trees and plants.

Implementation Plan

Under the LCP Implementation Plan removal of major vegetation is considered development (Section 22.68.030). Furthermore, LCP Implementation Plan section 22.86.060.H requires a Coastal Permit for removal of vegetation in an ESHA. Therefore, your could be subject to a Coastal Permit pursuant to the LCP Implementation Plan.

Chapter 22.64 provides general standards for proposed development, including site planning. The relevant standard and requirements are summarized below.

- 22.64.050.A.1.b requires a biological site prepared by the qualified biologist. The report shall confirm the extent of the ESHA, document any site constraints and the presence of other sensitive resources, recommend setbacks, and development timing, including required buffers, and provide other information, analysis and potential modifications necessary to protect the resource. If the site assessment identifies impacts, then the report shall analyze alternatives to avoid impacts to ESHA; if ESHA impacts cannot be avoided, include findings identifying why there are no feasible alternatives to avoid ESHA impacts, and identify appropriate mitigation measures. Where habitat restoration or creation is required to eliminate or offset potential impacts to an ESHA, a detailed Restoration and Monitoring plan is required.
- 22.64.050.A.1.d requires habitat mitigation. Residual adverse impacts to ESHA shall be fully mitigated, with priority given to on-site habitat mitigation. Off-site or fee-in-lieu habitat mitigation measures shall only be approved when it is not feasible to fully mitigate impacts on-site or where off-site habitat mitigation is more protective in the context of a biological analysis prepared by a qualified scientist and approved by the County of Marin. In determining required mitigation, the acreage of habitat impacted shall be determined based on the size of the vegetation clearance and other disturbance. Habitat mitigation may be required at an adjusted ratio or through other appropriate techniques as commensurate with the extent of habitat disruption, based on the specific requirements of the ESHA as determined through the site assessment.
- 22.64.050.A.2 requires a detailed site plan showing major vegetation, water courses, natural features, and other probable wildlife areas.
- 22.64.050.A.3 requires a detailed Restoration and Monitoring Plans. Some components of the Restoration and Monitoring Plan include: grading plan, erosion control plans, weed eradication plan, planting plan, irrigation plan, and monitoring plans. Please refer to Marin County LCP-Implementation Plan section 22.64.050.A.3 for the full list of requirements associated with the Restoration and Monitoring Plan.
- 22.64.050.B states development shall be consistent with the Biological Resources Policies of the Marin County LCP Land Use Plan. Please refer to the section above for the relevant polices.

Bolinas Community Plan

The subject properties are located within the unincorporated areas of Marin County, in the community of Bolinas. Implementation Plan section 22.66.050 discusses the Bolinas Community Standards. The Bolinas Community Standards discuss community character and new development.

ENVIRONMENTAL REVIEW

Given the amount of trees proposed for removal and the potential presence of special-status habitat types, the potential for special-status species and the likelihood that mitigation will be required for the project, it is likely that an environmental document prepared pursuant to the California Environmental Quality Act (CEQA) would be required for the project. Additional fees will be required as part of the environmental review study, and the County will potentially hire a qualified environmental consultant to complete the environmental review document for this project. The staff in the environmental planning program can discuss this with you as your project application gets further into the process. The environmental review process could add several months to the permitting process.

SUBMITTAL REQUIREMENTS AND REVIEW PROCESS

As noted above, the proposed project could be required to go through the Coastal Permit process and may require other approvals as well. Please refer to the attached Planning Application Guide, Planning Application Submittal Checklist, and the following list of submittal requirements to help you prepare the required plans, materials, and information necessary to process the application. In general, any application submitted must include appropriate plans for the entire site. Submitting a complete application is the key to finishing the planning process quickly. This checklist describes all the plans, documents, and other information necessary to prepare a complete application. A critical part of the site plans will be details associated with the tree removal. The site plan should include the exact location, tree size and trees proposed for remove. In addition to the items marked as required under Coastal Permit in the submittal checklist, the following items could also be required for the proposed project.

1. Biological Site Assessment;
2. Arborist's Report;
3. Archaeology Report;
4. Construction Program;
5. Revegetation Plan;
6. Stormwater Control Plan; and,
7. Restoration and Monitoring Plans.

As part of the County's review process, the project would be transmitted to various government agencies and community organizations including, but not necessarily limited to, Marin County Department of Public Works, Bolinas Community Public Utility District, Bolinas Fire Protection District and other interested groups and agencies.

PRELIMINARY ASSESSMENT-PROJECT CONSISTENCY WITH RELEVANT POLICIES AND REGULATIONS

The proposed project or portion of the proposed project could be subject to the Marin County LCP Land Use Plan and Implementation Plan if the trees proposed for removal are within a ESHA

pursuant to Implementation Plan section 22.86.060.H. The proposed tree removal could conflict with Marin County LCP Land Use Plan Policies C-BIO-2, C-BIO-4, C-BIO-10, and C-DES-8 which call for the protection of ESHAs, vegetation in ESHAs and the habitat provided within these areas.

In addition to the tree removal proposed as part of your project, you could be required to remove non-native vegetation in the affected area in accordance with Policy C-BIO-6. Policy C-DES-9 and LCP Implementation Plan section 22.64.050.A.1.d would require replanting with native species and habitat mitigation. Additionally, LCP Implementation Plan section 22.64.050.A.3 requires a detailed Restoration and Monitoring Plans. The result of the conflicts with the Marin County LCP Land Use Plan and Implementation Plan and the potential impacts as a result of the proposed project could potential be remedy through mitigation as part of the CEQA process with the use of mitigation measures.

CONCLUSION

The potential for all or part of the property to be an ESHA needs to be further investigated as a next step. A qualified biologist should be retained to evaluate the biological resources that may be on the property and make a recommendation regarding whether the area contains an ESHA. If not, then the work can proceed without first obtaining a Coastal Permit. However, if it is determined that there is an ESHA on the property, then a Coastal Permit will be required, and the project would probably be subject to environmental review.

The Marin County Planning Division would process the Coastal Permit, if one is necessary. The Coastal Permit would be within the Appeal Jurisdiction of the California Coastal Commission. Work in an ESHA would result in the need for habitat restoration. Additional measures could come as a result of the CEQA process. To fully evaluate your proposal additional information is needed; this information can be provided to us during the application process with the plans referred throughout this document.

Please refer to the attached comments received, Planning Application Guide, and Planning Application Submittal Checklist for additional information. I hope this information is useful to you. The Community Development Agency Planning Division staff looks forward to assisting you in the process of obtaining the entitlements necessary to achieve the project.

Please call me at (415) 473-6235 or send an e-mail to malton@marincounty.org if you have any questions regarding this letter or the application process for this proposal. Involved

Sincerely,



Megan Alton
Planner

Attachments:

1. California Coastal Commission Communication, February 11, 2022
2. California Coastal Commission Communication, February 15, 2022
3. California Coastal Commission Communication, February 16, 2022
4. Planning Application Guide
5. Planning Application Submittal Checklist

From: [Montano, Honora@Coastal](mailto:Montano.Honora@Coastal)
To: jonnaalexandergreen@gmail.com
Cc: [Cardoza, Sabrina](mailto:Cardoza.Sabrina); [KoppmanNorton, Julia@Coastal](mailto:KoppmanNorton.Julia@Coastal); [Rexing, Stephanie@Coastal](mailto:Rexing.Stephanie@Coastal)
Subject: Bolinas Eucalyptus Project Pre-Application
Date: Friday, February 11, 2022 4:14:04 PM
Attachments: [Outlook-vrikxrw.png](#)

Hi Jonna,

Julia passed your email to me - I am the Coastal Commission planner covering Marin County. First, we are confirming that this project falls within our appeals jurisdiction and the CDP will be issued by the County.

Second, I'd like to reiterate Julia's request for more information in order for us to provide more specific comments at this time. We will want to see more detailed plans and specifications on exact location, number of locations, and size of approximately 700 trees that are proposed to be removed.

We have reviewed the "Restoration Plan Outline for Restoration of Native Habitat for Zone 5," submitted by Judith Lowry as part of the cover letter. While these details are helpful, a more specific restoration plan will be necessary to account for the required mitigation of the proposed removal, including a planting map and plan that incorporates native species as well as bird, nesting, and other habitat-related BMPs. Once we have these additional details, we can review more closely to provide further feedback.

Thank you and please let us know if you have questions,

Honora Montano
Coastal Planner, North Central Coast District
California Coastal Commission



From: jonna alexander green <jonnaalexandergreen@gmail.com>
Sent: Monday, February 7, 2022 4:10 PM
To: [Cardoza, Sabrina <scardoza@marincounty.org>](mailto:scardoza@marincounty.org)
Cc: [KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>](mailto:julia.koppmannorton@coastal.ca.gov); [Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>](mailto:Stephanie.Rexing@coastal.ca.gov)
Subject: Re: Bolinas Eucalyptus Project Pre-Application

hello julia

i hope you are well. would you be available for a call anytime tomorrow tuesday before 3pm?
an aerial map of the project is attached.

best regards,

jonna alexander green

architectural designer
mobile: 1-612-751-4141
website: jonnaalexandergreen.com
also on [houzz](https://www.houzz.com)

On Thu, Feb 3, 2022 at 1:30 PM jonna alexander green <jonnaalexandergreen@gmail.com> wrote:

thank you for connecting us sabrina.

julia, would you mind if i called you this afternoon to clarify any details about the submittal?

best regards,
jonna alexander green
architectural designer
mobile: 1-612-751-4141
website: jonnaalexandergreen.com
also on [houzz](https://www.houzz.com)

----- Forwarded message -----

From: **Cardoza, Sabrina** <scardoza@marincounty.org>
Date: Thu, Feb 3, 2022 at 11:19 AM
Subject: RE: Bolinas Eucalyptus Project Pre-Application
To: KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>, jonna alexander green <jonnaalexandergreen@gmail.com>

Hi Julia,

Thank you for taking a look at this transmittal. I would like to connect you with the applicant, Jonna, as well in the hopes that the two of you can connect on what additional information is needed in order to receive more substantive comments from the perspective of the Coastal Commission as this property is located within the appeal jurisdiction. Jonna is cc'd here and her phone contact for reference is 1-614-751-4141.

The pre-application is intended to provide applicants with feedback on their proposal as it relates to policy and submittal information prior to them submitting an actual Coastal Permit. The county will certainly provide information related to the our LCP policies and standards; however, I think it would be helpful to get your feedback as well. In your comments, it would also be helpful to if your staff could confirm what the permit jurisdiction is here – I believe it would be a county permit. For the

purposes of the pre-application, I think it would be helpful to provide the applicant feedback on what the Coastal Commission staff sees is important as to BMPS, restoration, and potential mitigations.

I'll let Jonna add clarifications here, but the project map on map page two of the cover letter provides the extent of where the tree removal would occur, which includes approximately 700 trees in total and identifies the number of roadside trees. Of course, at the time of a permit application, there would be survey level details.

Thank you,
Sabrina Cardoza (she/her)

***** Please note that I may be working remotely and am limited to email until further notice. Phone calls will be responded to in the order they are received.*****

Senior Planner | County of Marin
Community Development Agency, Planning Division
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903
415-473-3607 T
415-473-7880 F

comlogo_email



From: KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>
Sent: Monday, January 10, 2022 11:41 AM
To: Cardoza, Sabrina <scardoza@marincounty.org>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>
Subject: RE: Bolinas Eucalyptus Project Pre-Application

Hi Sabrina,

Thanks for sending this pre-application referral for vegetation removal in Bolinas. Based on the currently submitted materials, it is unclear exactly where and how many trees are proposed to be removed, as there is differing information between the cover letter and the associated reports. We will want to see more detailed plans and specifications on exact location, number of locations, and number/size of trees that are proposed to be removed. In addition, a detailed restoration plan would be

necessary to account for the required mitigation of the proposed removal, including a planting plan that incorporates native species as well as bird, nesting, and other habitat-related BMPs. Once we have these additional details, we can review more closely to provide further feedback. Please let us know if you have questions. Happy new year!

Best,
Julia

From: KoppmanNorton, Julia@Coastal
Sent: Tuesday, December 21, 2021 1:10 PM
To: Cardoza, Sabrina <scardoza@marincounty.org>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>
Subject: RE: Bolinas Eucalyptus Project Pre-Application

Thanks, Sabrina. We will review and get back to you. Happy holidays!

Julia

From: Cardoza, Sabrina <scardoza@marincounty.org>
Sent: Monday, December 20, 2021 4:42 PM
To: KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>
Subject: Bolinas Eucalyptus Project Pre-Application

Hi Julia,
Please find attached the transmittal for a pre-application review request regarding a vegetation removal project in Bolinas.

Please note that I have requested comments regarding preliminary merits by January 21, 2022.

Thank you,
Sabrina Cardoza (she/her)

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Email Disclaimer: <https://www.marincounty.org/main/disclaimers>

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From: [Montano, Honora@Coastal](mailto:Montano.Honora@Coastal)
To: jonna.alexander.green
Cc: [Cardoza, Sabrina](mailto:Cardoza.Sabrina); [KoppmanNorton, Julia@Coastal](mailto:KoppmanNorton.Julia@Coastal); [Rexing, Stephanie@Coastal](mailto:Rexing.Stephanie@Coastal)
Subject: Re: Bolinas Eucalyptus Project Pre-Application
Date: Tuesday, February 15, 2022 9:32:41 AM
Attachments: [Outlook-vrikxrw.png](#)

Hi Jonna, thank you for the additional context. We understand your initiative is being operated on a volunteer basis and we sympathize with the limited resources that are available at this time for the project.

However, at this stage in the process and with the information we have, we are not able to provide a guarantee one way or another with regards to a potential appeal.

By way of general guidance as you put together the application, I would recommend reviewing the policies on Environmentally Sensitive Habitat Areas (ESHAs) in the Marin County Land Use Plan ([find the pdf here](#)) page 22, C-BIO 1, 2, 4, 5, 6, 10. C-DES-8 Protection of Trees. (pg 47) may also be relevant. Eucalyptus groves may be considered ESHA under the LCP and in that case, ESHA policies would apply. The Marin LCP will be the standard of review for this CDP, with the Coastal Act providing additional guidance.

As a general rule, we look for a ratio of 3:1 for on-site habitat mitigation projects.

Also, here is an FAQ document on the Commission's appeal process, for background info: <https://documents.coastal.ca.gov/assets/cdp/appeals-faq.pdf>

I hope that helps, and please let me know if you have additional questions.

-Honora

From: jonna.alexander.green <jonnaalexandergreen@gmail.com>
Sent: Monday, February 14, 2022 12:10 PM
To: Montano, Honora@Coastal <Honora.Montano@coastal.ca.gov>
Cc: Cardoza, Sabrina <scardoza@marincounty.org>; KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>; Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>
Subject: Re: Bolinas Eucalyptus Project Pre-Application

hello honora

thanks for your email. bolinas eucalyptus project consists of a small group of volunteers working on a large scale public safety project. the detailed plans you are requesting cost a small fortune. before we can commit to spending that money we need to know if the general concept of this restoration project is going to be appealed by your organization and on what grounds. we need to know more before we ask for or spend additional donor money. for us this pre application is a testing of the waters to understand your appeal process and general

take on the idea of removing 700 eucalyptus trees (large and small) and replacing them with more appropriately scaled native plants. you are asking us to provide all of the information up front when we just do not have the funds or full community backing just yet. we need to know more before we dive deeper. our town and donors would be devastated to put money and work toward planning this project only to be appealed by the coastal commission. we have every intention to protect the habitat these trees provide but at the end of the day human safety on a major evacuation route has got to be the priority. have i provided enough clarity to our situation?

best regards,

jonna alexander green

architectural designer

mobile: 1-612-751-4141

website: jonnaalexandergreen.com

also on [houzz](https://www.houzz.com)

On Fri, Feb 11, 2022 at 4:12 PM Montano, Honora@Coastal
<Honora.Montano@coastal.ca.gov> wrote:

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California Coastal Commission



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Sent: Monday, February 7, 2022 4:10 PM

To: Cardoza, Sabrina <scardoza@marincounty.org>

Cc: KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>; Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>

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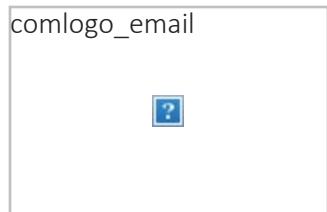
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Senior Planner | County of Marin
Community Development Agency, Planning Division
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903
415-473-3607 T
415-473-7880 F



From: KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>

Sent: Monday, January 10, 2022 11:41 AM
To: Cardoza, Sabrina <scardoza@marincounty.org>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>
Subject: RE: Bolinas Eucalyptus Project Pre-Application

Hi Sabrina,

Thanks for sending this pre-application referral for vegetation removal in Bolinas. Based on the currently submitted materials, it is unclear exactly where and how many trees are proposed to be removed, as there is differing information between the cover letter and the associated reports. We will want to see more detailed plans and specifications on exact location, number of locations, and number/size of trees that are proposed to be removed. In addition, a detailed restoration plan would be necessary to account for the required mitigation of the proposed removal, including a planting plan that incorporates native species as well as bird, nesting, and other habitat-related BMPs. Once we have these additional details, we can review more closely to provide further feedback. Please let us know if you have questions. Happy new year!

Best,
Julia

From: KoppmanNorton, Julia@Coastal
Sent: Tuesday, December 21, 2021 1:10 PM
To: Cardoza, Sabrina <scardoza@marincounty.org>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>
Subject: RE: Bolinas Eucalyptus Project Pre-Application

Thanks, Sabrina. We will review and get back to you. Happy holidays!

Julia

From: Cardoza, Sabrina <scardoza@marincounty.org>
Sent: Monday, December 20, 2021 4:42 PM
To: KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>
Subject: Bolinas Eucalyptus Project Pre-Application

Hi Julia,
Please find attached the transmittal for a pre-application review request regarding a

vegetation removal project in Bolinas.

Please note that I have requested comments regarding preliminary merits by January 21, 2022.

Thank you,
Sabrina Cardoza (she/her)

***** Please note that I may be working remotely and am limited to email until further notice. Phone calls will be responded to in the order they are received.*****

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From: [Montano, Honora@Coastal](mailto:Montano.Honora@Coastal)
To: [Cardoza, Sabrina](mailto:Cardoza.Sabrina); jonna.alexander.green
Cc: [KoppmanNorton, Julia@Coastal](mailto:KoppmanNorton.Julia@Coastal); [Rexing, Stephanie@Coastal](mailto:Rexing.Stephanie@Coastal)
Subject: Re: Bolinas Eucalyptus Project Pre-Application
Date: Thursday, February 17, 2022 10:25:55 AM
Attachments: [Outlook-vrikxrw.png](#)

Thank you for your comments, Sabrina!

Jonna, I will just reiterate that each project is evaluated fully at the time of CDP application once all substantive materials are received. As a reminder, the County will be evaluating your CDP application, not the CCC. Each project is unique and so is evaluated as such against relevant LCP Policies for consistency. If your analysis determines that a 3:1 habitat restoration ratio is not feasible given site constraints or other factors, your application should clearly provide evidence as to why this is the case. Additionally, you should document current conditions and as I have mentioned, provide detailed information on your proposed restoration plan.

Due to serious CCC staff constraints and as Sabrina mentioned, a site visit is not feasible at this stage of the process.

Thanks and hope that helps as you put together your application.

Honora

From: jonna.alexander.green <jonnaalexandergreen@gmail.com>
Sent: Thursday, February 17, 2022 9:50 AM
To: Montano, Honora@Coastal <Honora.Montano@coastal.ca.gov>
Cc: Cardoza, Sabrina <scardoza@marincounty.org>; KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>; Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>
Subject: Re: Bolinas Eucalyptus Project Pre-Application

Hello Honora,
Thanks for the clarification. So for our case, in order to restore 12 acres we would need to identify 36 acres to restore? Seems really hard to achieve. Seems like a restoration project such as ours should not need to be multiplied by 3.

Is there is a way for someone from the ccc to come evaluate our project site in person? We feel maps and images will never be able to show you the severity of the current conditions of this grove.

Best regards,

Jonna

On Wed, Feb 16, 2022 at 3:03 PM Montano, Honora@Coastal
<Honora.Montano@coastal.ca.gov> wrote:

Hi Jonna,

The 3:1 ratio is typically for acreage, not calculated by individual plants or trees. Said another way, for every acre impacted by your project (or in this case, of trees removed), we would be looking for 3 acres of restored habitat at the project site or adjacent area. Again, this ratio is not set in stone and each project is evaluated at the time of CDP application once we have all of your materials. Typically if the habitat restoration is done elsewhere at a different site the ratio would be higher, as that is less desirable from an ecological perspective.

The exact species would be something you would need to provide in your application as part of the plant list and map; we do not provide plant lists or require certain species. The Marin LCP Land Use Plan does provide some guidance regarding a preference for native, low water species that provide habitat benefits, which seems to already align with your project goals - for example, see LUP Policy C-DES-9.

Thanks,
Honora

From: jonna alexander green <jonnaalexandergreen@gmail.com>

Sent: Wednesday, February 16, 2022 8:31 AM

To: Montano, Honora@Coastal <Honora.Montano@coastal.ca.gov>

Cc: Cardoza, Sabrina <scardoza@marincounty.org>; KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>; Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>

Subject: Re: Bolinas Eucalyptus Project Pre-Application

Hello Honora,

Thanks for your understanding and for sending more information. We will get together as a group and come back with our questions.

When you mentioned the 3:1 mitigation we were curious what that would look like in this case since the grove is over 700 large trees that are tightly spaced. Can you please clarify how that general rule would be applied and if the new 2100+ plants would need to trees (what species?) and would they all need to be planted at the project site or elsewhere in the area? The project area is already suffering from over vegetation with the trees spaced so closely together, are there any alternatives you can suggest for cases such as ours?

Best regards,

jonna alexander green

architectural designer

mobile: 1-612-751-4141

website: jonnaalexandergreen.com

On Tue, Feb 15, 2022 at 9:30 AM Montano, Honora@Coastal
<Honora.Montano@coastal.ca.gov> wrote:

Hi Jonna, thank you for the additional context. We understand your initiative is being operated on a volunteer basis and we sympathize with the limited resources that are available at this time for the project.

However, at this stage in the process and with the information we have, we are not able to provide a guarantee one way or another with regards to a potential appeal.

By way of general guidance as you put together the application, I would recommend reviewing the policies on Environmentally Sensitive Habitat Areas (ESHAs) in the Marin County Land Use Plan ([find the pdf here](#)) page 22, C-BIO 1, 2, 4, 5, 6, 10. C-DES-8 Protection of Trees. (pg 47) may also be relevant. Eucalyptus groves may be considered ESHA under the LCP and in that case, ESHA policies would apply. The Marin LCP will be the standard of review for this CDP, with the Coastal Act providing additional guidance.

As a general rule, we look for a ratio of 3:1 for on-site habitat mitigation projects.

Also, here is an FAQ document on the Commission's appeal process, for background info: <https://documents.coastal.ca.gov/assets/cdp/appeals-faq.pdf>

I hope that helps, and please let me know if you have additional questions.

-Honora

From: jonna alexander green <jonnaalexandergreen@gmail.com>

Sent: Monday, February 14, 2022 12:10 PM

To: Montano, Honora@Coastal <Honora.Montano@coastal.ca.gov>

Cc: Cardoza, Sabrina <scardoza@marincounty.org>; KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>; Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>

Subject: Re: Bolinas Eucalyptus Project Pre-Application

hello honora

thanks for your email. bolinas eucalyptus project consists of a small group of volunteers working on a large scale public safety project. the detailed plans you are requesting cost a small fortune. before we can commit to spending that money we need to know if the

general concept of this restoration project is going to be appealed by your organization and on what grounds. we need to know more before we ask for or spend additional donor money. for us this pre application is a testing of the waters to understand your appeal process and general take on the idea of removing 700 eucalyptus trees (large and small) and replacing them with more appropriately scaled native plants. you are asking us to provide all of the information up front when we just do not have the funds or full community backing just yet. we need to know more before we dive deeper. our town and donors would be devastated to put money and work toward planning this project only to be appealed by the coastal commission. we have every intention to protect the habitat these trees provide but at the end of the day human safety on a major evacuation route has got to be the priority. have i provided enough clarity to our situation?

best regards,

jonna alexander green

architectural designer

mobile: 1-612-751-4141

website: jonnaalexandergreen.com

also on [houzz](https://houzz.com)

On Fri, Feb 11, 2022 at 4:12 PM Montano, Honora@Coastal
<Honora.Montano@coastal.ca.gov> wrote:

Hi Jonna,

Julia passed your email to me - I am the Coastal Commission planner covering Marin County. First, we are confirming that this project falls within our appeals jurisdiction and the CDP will be issued by the County.

Second, I'd like to reiterate Julia's request for more information in order for us to provide more specific comments at this time. We will want to see more detailed plans and specifications on exact location, number of locations, and size of approximately 700 trees that are proposed to be removed.

We have reviewed the "Restoration Plan Outline for Restoration of Native Habitat for Zone 5," submitted by Judith Lowry as part of the cover letter. While these details are helpful, a more specific restoration plan will be necessary to account for the required mitigation of the proposed removal, including a planting map and plan that incorporates native species as well as bird, nesting, and other habitat-related BMPs. Once we have these additional details, we can review more closely to provide further feedback.

Thank you and please let us know if you have questions,

Honora Montano

Coastal Planner, North Central Coast District

California Coastal Commission



From: jonna alexander green <jonnaalexandergreen@gmail.com>
Sent: Monday, February 7, 2022 4:10 PM
To: Cardoza, Sabrina <scardoza@marincounty.org>
Cc: KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>; Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>
Subject: Re: Bolinas Eucalyptus Project Pre-Application

hello julia
i hope you are well. would you be available for a call anytime tomorrow tuesday before 3pm?
an aerial map of the project is attached.

best regards,
jonna alexander green
architectural designer
mobile: 1-612-751-4141
website: jonnaalexandergreen.com
also on [houzz](#)

On Thu, Feb 3, 2022 at 1:30 PM jonna alexander green <jonnaalexandergreen@gmail.com> wrote:

thank you for connecting us sabrina.

julia, would you mind if i called you this afternoon to clarify any details about the submittal?

best regards,
jonna alexander green
architectural designer
mobile: 1-612-751-4141
website: jonnaalexandergreen.com
also on [houzz](#)

----- Forwarded message -----

From: **Cardoza, Sabrina** <scardoza@marincounty.org>
Date: Thu, Feb 3, 2022 at 11:19 AM
Subject: RE: Bolinas Eucalyptus Project Pre-Application
To: KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>

Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>, jonna alexander green <jonnaalexandergreen@gmail.com>

Hi Julia,

Thank you for taking a look at this transmittal. I would like to connect you with the applicant, Jonna, as well in the hopes that the two of you can connect on what additional information is needed in order to receive more substantive comments from the perspective of the Coastal Commission as this property is located within the appeal jurisdiction. Jonna is cc'd here and her phone contact for reference is 1-614-751-4141.

The pre-application is intended to provide applicants with feedback on their proposal as it relates to policy and submittal information prior to them submitting an actual Coastal Permit. The county will certainly provide information related to the our LCP policies and standards; however, I think it would be helpful to get your feedback as well. In your comments, it would also be helpful to if your staff could confirm what the permit jurisdiction is here – I believe it would be a county permit. For the purposes of the pre-application, I think it would be helpful to provide the applicant feedback on what the Coastal Commission staff sees is important as to BMPS, restoration, and potential mitigations.

I'll let Jonna add clarifications here, but the project map on map page two of the cover letter provides the extent of where the tree removal would occur, which includes approximately 700 trees in total and identifies the number of roadside trees. Of course, at the time of a permit application, there would be survey level details.

Thank you,
Sabrina Cardoza (she/her)

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To: Cardoza, Sabrina <scardoza@marincounty.org>
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