

Date: July 16, 2024

To: Melanie Hadden (San Mateo County Harbor District)

From: Jill Grant (resident of El Granada and professional CEQA Planner & Biologist)

Subject: - July 17, 2024 Comment Letter

- 1) **The lighting at the RV Park** is not compliant with the permit. It uses tall poles with unshielded lights that produce light spillover that travels outside of the RV Park. With the removal of the non-compliant, tall Cypress trees, the non-compliant lights are even more apparent. Please direct the RV Park to bring the lighting into compliance with the removal of the tall poles. Substituting amber colored lights would match those streetlights used in the adjacent El Granada and shorter lighted bollards such as those used at the Half Moon Bay Fire Station would be sufficient lighting for RV Park users and would retain our dark skies and protect our scenic view corridor.
- 2) **The new plantings at the RV Park/Bathroom are not compliant** with the project specifications. They are not California native plants and are moderately invasive. The design directive since the beginning of this project was to have a **California native, non-invasive** grassy mound within the Greenspace project, and this was the concept presented at public meetings and in illustrations since project inception. This non-native species of grass identified by Chris Rogers produces multiple seed heads (thus the invasive label) that spread by wind, water, and wildlife, in this case hitching a ride on human shoes to travel down the Coastal Recreation Trail to new frontiers! The original recommendation from the California licensed Landscape Contractor (Catmex) called for a "Delta No Mow", a mix of three types of California native fescue, so why was a substitute needed? I did not find any difficulty ordering this product online. And if a substitute was needed, why not use a California native plant expert such as Pacific Coast Seed (**attached current list of lawn mixes**) or Hedgerow Farms? Both give free consultations and recommendations. Fescue is a fast-growing plant and the contractor could have saved money by broadcasting seed which can be ordered online and mailed directly to the client within a week or picked up at their location in Livermore. As for the planting of the non-native strawberry tree (*Arbutus unedo*), there is no reason why a native tree could not have been chosen. There are many good small California native trees that could have been used for this site that provide an excellent food and shelter source for wildlife. Again, why not consult a California native plant expert of which we have MANY in the Bay Area that even deliver! **I've attached a map of them.** The author writes, "This is a small, contained area intended for public use, and not a habitat restoration project." But it could have served a dual use as a habitat restoration area and it could have served as an educational display of native California grassland habitat for visitors to the coast? This substitution is not in compliance with what was promised to the public. It is not true that there were no appropriate California native trees to substitute just as it is not true that there were no appropriate California native grasses for the sod. And while it is true that species substitutions are common in construction projects, these substitutions are still required to follow project specifications. The authors explanation of a "timely project completion" being "essential" to explain why a non-native, moderately invasive grass was used is just plain silliness. This project has been delayed over and over again throughout construction. The only reason the appropriate species were not used is either the

result of poor planning, poor follow up, or someone's attempt to make an additional profit by cutting corners. Please do not believe that this non-native turf installed at the project site will not spread to surrounding natural areas. Even with the daily watering and maintenance that occurred this past week, **seed heads have already been observed in the newly planted sod.** That author also states that the project site is not located near any natural areas with native grasslands that could be impacted from the use of non-native landscape plants. However, this is an area of high winds, winds that will bring those seeds wherever the wind blows including to the future Community Park on the adjacent Burnham Strip a short distance to the north which will be dominated by California native plantings and includes restoration of intermittent and perennial streams. Also, please reject the Contractor email from April 24th showing a photo of a degraded lawn as proof that the Delta No Mow mix of 3 native fescues will not fit the site. Look closely at the picture and you will see it is a grassy mound surrounded by bark mulch with a fun children's slide at the top. **THIS IS** an area of high traffic and any turf installed in those demanding conditions would do poorly (kids running up and down the slope all day long kicking the surrounding bark on top of it). However, the Bathroom lawn area is not an area that will be heavily used. It is an elevated grassy mound surrounded by a concrete ledge of seating. Parents will not want their children running back and forth on the slick, well-watered turf, slipping off the concrete ledge to the pavement below. The Landscape Contractor is responsible for landscape maintenance, including plant and irrigation system repair and replacement per the Harbor District contract for 180 days. Please direct the contractor to provide a replacement sod composed of California native species within 30 days that meets the project specifications and **fulfills the commitment made to the public.**

- 3) **Please change your meeting time for outside the normal workday of 9am – 5pm or hold them on the weekend.** Your public meetings stifle public participation. Holding a meeting at 10 am on a weekday and not allowing participants to attend or comment via Zoom or Teams suppresses public comment.



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No-Mow Mix

Festuca rubra rubra – Creeping Red
Fescue
Festuca commutata – Chewings
Fescue
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Pacific Park Mix

Lolium perenne – Perennial Rye
Poa pratensis – Kentucky Bluegrass
Fine Fescue



Pacific Shade

Poa trivialis
(<https://beta.seedops.com/species.php#>)
– Rough Bluegrass
Festuca rubra rubra – Creeping Red
Fescue
Lolium perenne – Perennial Rye
Poa pratensis – Kentucky Bluegrass
Poa pratensis – Chewings Fescue



Sportsclub 90/10

Festuca arundinacea – Tall Fescue
(90%)
Kentucky Bluegrass (10%)



Sportsclub 80/20

Festuca arundinacea – Tall Fescue
(80%)
Kentucky Bluegrass (20%)



Sportsclub 70/30

Festuca arundinacea – Tall Fescue
(70%)
Kentucky Bluegrass (30%)



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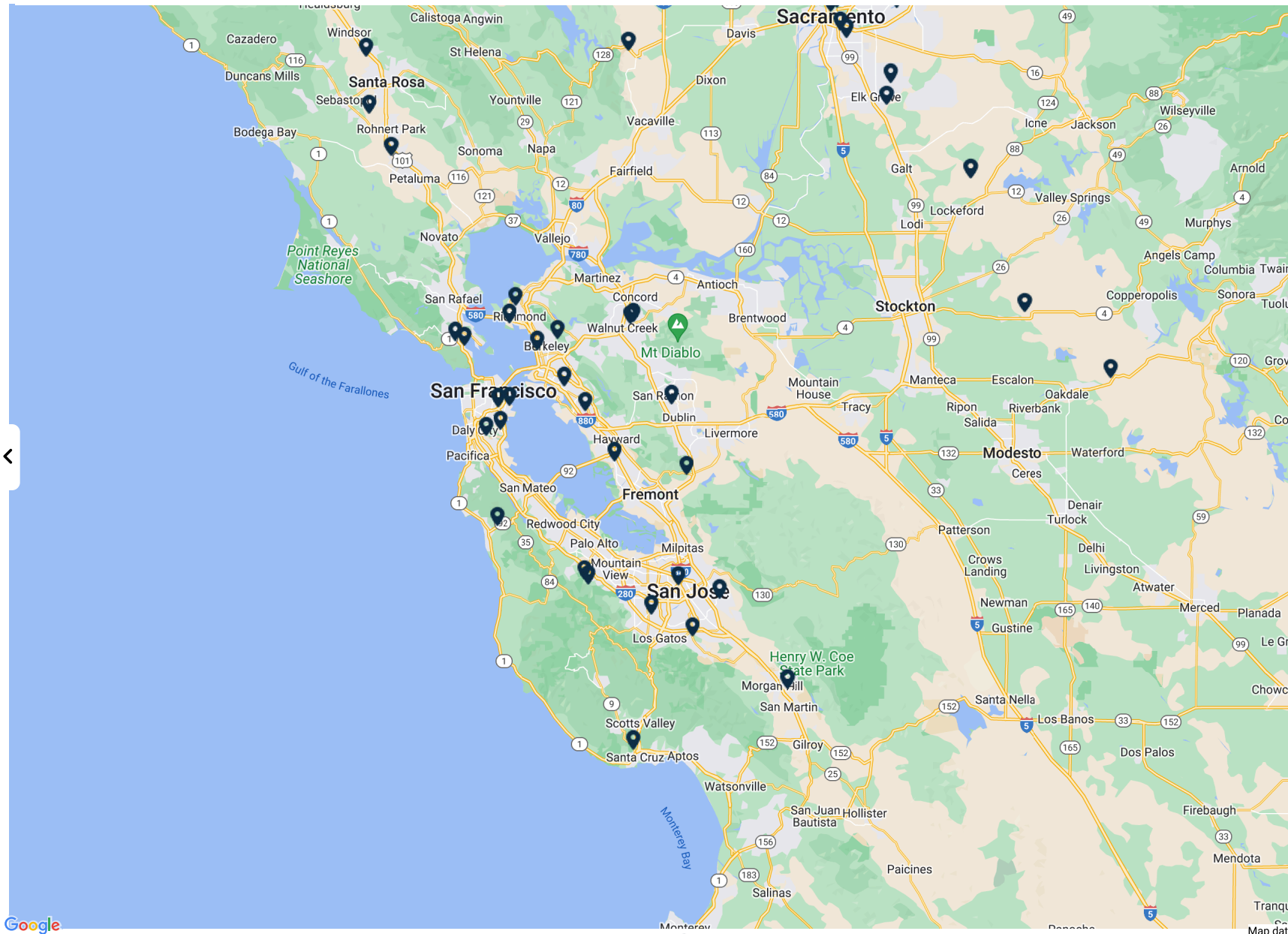
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