

My issues are:

1. The Wetland Restoration Section in the I/S
2. The failure to require wetland delineation
3. The Inclusion of Manila Community Services District in this CDP
4. The outdated proposed resolutions

I will run out of time before I cover my last two issues. They are in your copy of my planned presentation please look at them.

Issue #1.

FOD did not ask to work in wetlands.

Cliff Johnson and Jordan Mayor didn't know who or why the Wetland Restoration Section was in the IS/MND!

They also confirmed that if the permit was approved with the Wetland Restoration section in it, FOD would have been permitted to work in wetlands.

Despite the fact that common sense makes it clear FOD can't be required to avoid wetlands and simultaneously approved to work in them the Wetland Restoration section is still part of the CDP.

So how did the planning department take care of this?

They added the sentence, "Of note is that while this is described in the IS/MND, it is not proposed as part of the application and would therefore not be an allowed activity if this permit is approved."

Completely redact the entire Wetland Restoration section and all references to it or you will set a precedent allowing resource restoration in wetlands with the exception that Friends and Dunes cannot do Wetland Restoration on the APNs listed in this CDP.

Issue #2

FOD's wetlands have a buffer area that extends 250 feet from the boundary of the wetland.

Resource restoration to the wetland boundary is permissible.

The Planning Department is required to protect the wetlands and verify FOD's activities avoided wetlands.

Look at FOD's report showing areas they treated in 2019.

It is beyond comprehension how the planning department was able to look at that report and verify FOD's restoration activities avoided the wetlands.

Let me summarize; FOD determines their wetlands' boundaries, does not share those boundaries with the planning department, and self-certifies wetland avoidance. How cool is that!

This is precisely why the commission refused to approve this application in 2018.

Planning states, " They have not asked for an official wetland delineation... ." Tell me it's not so. Have they completely abdicated their responsibility to protect the wetlands?

The only way to confirm wetland avoidance is by field-checking work completed against a wetland delineation.

A wetland delineation report is a cost of doing business. It is not optional.

Require a wetland delineation report; if you don't, please amend the County Code and grant FOD a permanent exemption.

Issue # 3

MCSD's property APN 400-011-077 appears eight times in this package, is highlighted as part of the project area five times and appears in the IS/MND twice.

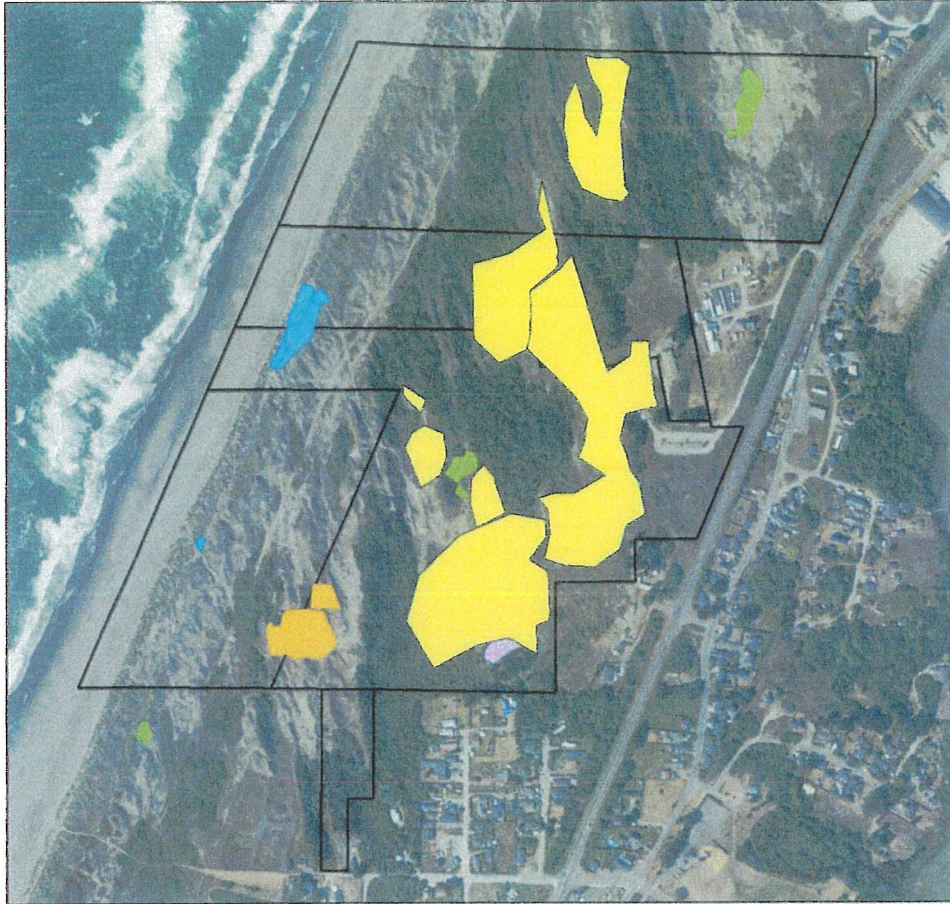
APN (077) was not part of CDP 06-49MMX.
This CDP does not involve MCSD.
Redact all references to MCSD.

Issue #4 Both suggested resolutions include the installation of a fence on the property line between the Barr property and the residence to the East. Both resolutions also include the removal of iceplant from the trailhead area.






Neither of the above is required by this CDP.
Update the resolutions

Figure 1

2019 Treated Areas Humboldt Coastal Nature Center



200 100 0 200 Meters

Treated Areas 2019	
	Annual Grass (2.3 Acres)
	European Beachgrass (1.8 Acres)
	Iceplant (1.4 Acres)
	Jubata (0.36 Acres)
	Yellow Bush Lupine (35 Acres)

Map Date: 2/3/2020
Coordinate System: NAD 1983 UTM Zone 10N
Aerial: NAIP 2018