Midcoast Community Council

An elected Advisory Council to the San Mateo County Board of Supervisors representing Montara, Moss Beach, El Granada, Princeton, and Miramar PO Box 248, Moss Beach, CA 94038-0248 | midcoastcommunitycouncil.org

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Date: March 27, 2024

- To: San Mateo County Board of Supervisors Steve Monowitz, Director, SMC Planning and Building Ann Stillman, Director, SMC Department of Public Works
- Re: McNee Ranch State Park/Montara Mountain North Peak Access Road Maintenance

Dear San Mateo County Board of Supervisors, Director Monowitz and Director Stillman,

The Midcoast Community Council represents the unincorporated communities of Montara, Moss Beach, El Granada, Princeton, and Miramar. We have received many complaints, questions, and concerns from the public over the last eight months regarding the emergency maintenance work conducted in 2023 on the Montara Mountain North Peak access road including issues raised about the overall stewardship and protection of Montara Mountain. The MCC is concerned that the history of maintenance to the road and the way that ongoing maintenance is handled has been damaging to this sensitive and unique area and continues to be handled inadequately to preserve and protect the parks. The public (both locals and visitors alike) expects conservation and stewardship of this irreplaceable ecosystem and protection of the landscape as a valued public resource to be a priority.

Montara Mountain, a local landmark, unique and sensitive habitat, and public park

Residents and visitors to McNee Ranch State Park know it as Montara Mountain, and they traverse the road to the peak and have been doing so for decades. It is a recreational trail for users of all three parks (McNee Ranch SP, San Pedro Valley County Park, and GGNRA). From the road, visitors experience the beauty of the landscape and views from the higher elevation that are unmatched on the midcoast, where on a clear day one can see Pacifica, San Francisco, the Farallons, Pillar Point Harbor and the ocean to the south, west, and northwest. The public often doesn't realize that the park is contiguous with other parcels and includes McNee Ranch State Park, Golden Gate National Recreation Area (GGNRA) land, the North County Coast Water District (NCCWD) which is leased to San Mateo County, San Francisco Public Utilities Commission (SFPUC), and San Mateo County Parks. This is unfortunate, because not all landowner stakeholders are good stewards nor do they seem to care or consider its historical, ecological or recreational value. The peak itself has been damaged and continues to be degraded by the SFPUC and the multiple communications leasees that are allowed to place communications apparatus there.

California State Parks describes the area as "the only undisturbed coastal mountain habitat found on over 100 miles of coastline. It is an ecological island of natural biological diversity. Its steep slopes have minimized human impact, making it home to plant and animal communities found nowhere else in the world."

What happened and what is now needed?

The planning and physical maintenance of the North Peak Access Road last year was carried out by the San Mateo County Department of Emergency Management (DEM) with PG&E equipment and operators. SMC DEM's analysis of options in the project report clearly indicates this project was characterized and pursued as an emergency for economic reasons and expediency, not because it was a dire emergency. In fact the focus seems to have been on characterizing this project in such a way as to secure partial government funding set aside specifically for damages incurred from the spring storms. We also note that road maintenance closely matching the County's emergency plan was proposed and included in much earlier permit application materials from American Tower Corporation, to facilitate continuing access and work at the site their equipment occupies on the mountain, so the road maintenance was already on the County's radar.

Instead of careful collaborative advance planning and preparation with stewardship of the park as the main priority, the County seems to have been focused on serving the needs of corporate stakeholders. This conflict of interest resulted in a heavy handed, short-sighted approach with a minimum of input and preparation. In the long term, it undermines the ability of CA State Parks and other stewards of our local public lands who have limited resources, to uphold their public mission. The process and the result is concerning and has prompted numerous complaints from the public, including one letter printed in the Pacifica Tribune on July 18, 2023, from a young boy scout who said "I have always loved looking at all of the little organisms that live along the edges of the trail, and it is sad to know that many of them are gone. I hope that better solutions can be found in the future."

This isn't the first time road maintenance has occurred, and yet there is no ongoing maintenance plan, and no continuity or learning from previous road maintenance. Each instance of maintenance is treated as a last minute urgent issue and intended as a short-term fix. Current resources for planning rural road maintenance include San Mateo County Resource Conservation District's best management practices, "<u>The Central Coast Private Roads</u> <u>Maintenance Guide</u>" in which San Mateo County Department of Public Works is listed as a resource. There is also a guide recommended by the State, published by the University of California, Division of Agriculture and Natural Resources, of best practices entitled "<u>Rural Roads: A Construction and Maintenance Guide for California Landowners</u>. Both of these would be helpful in the creation of a regular maintenance plan.

The result of the recent road maintenance project was excessive shoulder clearing that damaged slope edges and removed large amounts of vegetation beyond the road perimeter in some areas. McNee Ranch State Park is an area of unique and sensitive habitats, including several species of concern, and there is potential for significant impact to plant communities and wildlife. We understand from more than one plant biologist that although plant communities are expected to recover, the recovery process could take up to five years. The shoulder clearing also left areas ripe for the spread of invasive species that tend to invade in areas of soil

disturbance. Because this was intended as a temporary fix and not a long-term solution, grading in some areas created the potential for increased erosion and poor drainage during future storm events. In fact, there are areas where the short-term mitigation strategies used during this recent maintenance effort have already failed during this season's storms.

In light of the unfortunate way this project was handled and the concerns expressed by the public, the MCC requests that the County work with CA State Parks in the near term, to create a plan to restore areas of excessive clearing and address areas where short-term stormwater runoff mitigation strategies failed and where continuing drainage issues exist. The plan should include a long-term strategy to mitigate any invasive plants that may have spread or been introduced by this work. We also recommend a follow up assessment of impact from the recent road maintenance and creation of a regular maintenance plan for the road that focuses on care of the park as a primary goal. This road maintenance plan should take into account all previous maintenance efforts, identify lessons learned, include documented best practices and provide an educational component that ensures those who implement road maintenance work are properly trained and managed. The maintenance plan should afford an opportunity for public comment and for local citizen involvement. Further, we ask the County to pay for all the work outlined above to rectify the issues to which it has in large part contributed.

Identified issues and possible solutions

The primary problem is a conflict in the use of Montara Mountain as a site for communications infrastructure that is deemed critical because there are no redundancies or alternative infrastructure to serve the San Mateo coastside. Given the vulnerabilities to reliance on this site, alternative infrastructure solutions need to be identified and implemented. This would seem to be in line with San Mateo County's CRISP initiative, to identify, develop, and implement reliable and redundant communications infrastructure to serve the unincorporated areas and Half Moon Bay. This kind of change takes long-range planning, and with the current infrastructure momentum and funding at the federal and state levels, there is an opportunity to begin the process. We recommend this objective—to alleviate the need for reliance on communications infrastructure on Montara Mountain—be prioritized as a long-term goal.

In the short term there remains a conflict in terms of differing stakeholder views of the purpose of the road and how to maintain it. We ask that the road first and foremost be considered as part of the park, integrated with its natural biological resources, and as a recreational resource. As such, there should be appropriate monitoring and care taken to perform any future maintenance in a way that protects the sensitive habitat, ecosystems, endangered and at risk species, and the natural and scenic value of the area.

We note that multinational American Tower Corporation (ATC), has an application for undergrounding electric lines which service equipment on their parcel. The ATC agreement with the County expires in 2026. This agreement outlines the County's portion of cost and role in road repair. We ask the County to reconsider this contract with an eye towards park conservation, and to explore other less damaging ways for ATC to access its parcel. We oppose granting any temporary or permanent easement agreements to ATC or other corporate entities for access on Montara Mountain. Both SFPUC and ATC have alternatives to access their equipment and both entities have greater financial resources than San Mateo County. One such alternative is a route that crosses watershed lands and which has stronger protections that users would be required to follow with more accountability. The maintenance needs on any of these roads are similar and they all rely on public dollars to maintain access. SFPUC and ATC also have the option to access their equipment by helicopter and they have done so in the past. In 2023, park users documented instances of disregard for the area by SFPUC, ATC and other communications leasees. We have included photos of some of these incidents with this letter.

Conservation of Montara Mountain

In response to the outpouring of community comment that we have received, the MCC encourages all stakeholders to consider a long-range plan for eventual removal of the communications equipment and infrastructure and to return the peak to a natural state in keeping with conservation of this remaining ecosystem as a complete protected area for future generations. We want to avoid the sad fate of San Bruno Mountain where ATC has essentially paved over the ridge top with a parking lot and the area is rife with invasives. The unique ecosystem and biological diversity of this area will survive longer if it is stewarded as a complete landscape rather than being vulnerable as individual parcels to the whims of individual stakeholders with objectives that conflict with protection of this much loved coastal northern spur of the Santa Cruz Mountains.

Sincerely,

MIDCOAST COMMUNITY COUNCIL s/Gus Mattammal, Chair

cc: Ray Mueller, Supervisor, San Mateo County District 3 David Barnett, Consultant, San Mateo County Office of Emergency Services Shruti Dhapodkar, Director, SMC Department of Emergency Management Linda Hitchcock, California State Parks David Smith, Golden Gate National Recreation Area, National Park Service Nicolas Calderon, San Mateo County Parks Tim Ramirez, SFPUC Natural Resources and Lands Management Division Manager Dan Carl, North Central Coast District Director, CA Coastal Commission