

Vallemar Bluffs Conservation and Development Project
Management Planning Framework
August 2018

Purpose

This document provides the framework for protection, restoration, and management of the 0.92-acre conservation area that will be established as part of the Vallemar Bluffs Conservation and Development Project. It was developed to provide information about the conservation element for inclusion in the Initial Study/Mitigated Negative Declaration being prepared by the County of San Mateo for the project. The information outlined here will provide a basis for development of, and will be integrated into, a habitat management plan following approval of the development project, and prior to issuance of building permits.

The framework includes the following:

1. **Goals, Objectives, and Success Criteria:** the proposed restoration and management achievements within the 0.92-acre conservation area, including objectives and success criteria for enhancement of 0.71 acres targeted for restoration (Table 1, Figure 1);
2. **Implementation Framework:** a description of how a habitat management plan will be prepared to guide restoration and management, tasks will be scheduled and funded, and the roles and responsibilities for various entities involved on protecting and managing the conservation area.

1 Goals and Objectives

Restoration and management within the 0.92-acre conservation area will be designed to protect, restore, and management native biodiversity in the coastal terrace prairie, including by promoting rare plant populations, while allowing compatible access.

1.1 Biodiversity

1.1.1 Goals

- B1. Enhance the natural community structure and native species composition of the coastal terrace prairie, which is a sensitive natural community.
- B2. Maintain or increase the areal extent and abundance of the Blasdale's bent grass (*Agrostis blasdalei*), to promote persistence of this population within Vallemar Bluffs.
- B3. Maintain or improve habitat for the other rare plant species that occur in the coastal terrace prairie, harlequin lotus (*Hosackia gracilis*) and Johnny nip (*Castilleja ambigua* ssp. *ambigua*), to promote viability of the populations of these species.

1.1.2 Objectives

The following are specific management and restoration objectives for biodiversity conservation. Specific treatment areas for select objectives are illustrated in Table 1 and Figure 1.

1. Increase the cover and diversity of native coastal terrace prairie plants by removing the planted/ornamental plant species within approximately 1,897 sf (0.043 acres)
2. Increase the cover and diversity of native coastal terrace prairie plants by removing ice plant mats covering approximately 5,991 sf (0.138 acres).
3. Increase the cover and diversity of native coastal terrace prairie plants by removing wood chips, base rock, or other non-native material covering approximately 1,700 sf (0.039 acres).
4. Promote native plant community structure and species composition by restoring the natural topography in areas where mounds (~ 1,358 sf or 0.31 acres) or swales (~1,297 sf or 0.030 acres) were created through prior excavation, where doing so will enhance native plant community structure and species composition.
5. Increase the cover and diversity of native coastal terrace prairie plants by controlling invasive plants including prickly sow thistle which outcompete native plant species in approximately 923 sf (0.021 acres).
6. Increase the cover and diversity of native coastal terrace prairie plants by controlling dense exotic grasses and forbs where they dominate native species in an additional 10,568 sf (0.243 acres) to promote the abundance and diversity of native plants.
7. Increase the cover and diversity of native coastal terrace prairie plants in 270 lineal feet of *de facto* trails used to access the Bluff Trail from Juliana and Valleymar Streets, where current plant cover is low. Where appropriate, maintain open ground to promote the population of Blasdale's bent grass, a rare species that inhabits low-statured grasslands with high bare ground including where the trail from Juliana Street meets the Bluff Trail.
8. Increase the cover and diversity of native coastal terrace prairie plants reducing the abundance of disturbance-adapted native plants such as coastal tarweed in approximately 9,747 sf (0.155 acres) where they are dominant (e.g., in the southeastern corner of the property) to promote the establishment and growth of a broader diversity of native grasses and forbs.
9. Increase the distribution and abundance of harlequin lotus and coastal terrace prairie species by salvaging seed and topsoil from development for use in on-site restoration, where doing so can enhance the rare plant population and natural community structure and species composition.
10. Monitor natural community structure and species composition and the population of Blasdale's bent grass within coastal terrace prairie, to gauge the effectiveness of management and inform adjustments as part of the adaptive management framework.

1.2 Access

1.2.1 Goals

- A1. Facilitate passive recreation that is compatible with restoration and management of the coastal terrace prairie community and rare plants both in the conservation area, including public access on the Bluff Trail that is largely within the Fitzgerald Marine Reserve.
- A2. Provide access for scientific research, to increase understanding of the natural systems and inform their effective conservation and management.

- A3. Develop and maintain the infrastructure necessary to manage compatible access, including fences and interpretive signage, using approaches that limit impacts to biodiversity and the scenic values of the conservation area.

1.2.2 Objectives

1. Install symbolic fencing along the perimeter of the conservation area, to clearly delimit the boundary between it and the adjacent development areas and Fitzgerald Marine Reserve land.
2. Install signs that provide information about the conservation area including the rationale for its protection, to promote compliance with access restrictions.
3. Record in the CC&Rs for the parcels as well as the conservation easement, prohibitions against access to the conservation area that is not compatible with conservation, restoration, and management of natural community structure and species composition in the coastal terrace prairie and populations of rare native plants. Examples of prohibited activities include: installation of permanent or semi-permanent infrastructure or equipment such as outdoor furniture (e.g., patio furniture, picnic tables, umbrellas), play equipment (trampolines, play structures, etc.) or other items that intensify use or otherwise modify the structure and species composition of the grassland.
4. Work with the County of San Mateo, to coordinate on management of the Bluff Trail, which is largely within the Fitzgerald Marine Reserve but also occurs within a small portion of the conservation easement area, and that provides public access along the bluff edge. Ensure that the recreational use there is managed to be compatible with the restoration and management of the coastal terrace prairie and rare plants in the conservation area.
5. Monitor the effects of access and compliance with the measures to prevent trampling associated with recreational use and taking steps to increase compliance when/if negative impacts are observed.

2 Success Criteria

Success criteria will be used to evaluate whether the restoration and management has been effective at achieving the goals and objectives. The following are proposed success criteria for biodiversity goals and objectives. No separate access success criteria have been identified, since the access limitations are primarily designed to promote achievement of the success criteria related to biodiversity.

1. Within the restoration areas, achieve absolute cover and species richness of native grasses and forbs characteristic of the coastal terrace prairie that is 75% of that found in the intact, native-dominated coastal terrace prairie on site within five years of initiating restoration.
2. Within the management area (i.e., area outside of the restoration area), maintain or increase the cover and richness of native grasses and forbs characteristic of the coastal terrace prairie.
3. Maintain or increase the distribution (i.e., areal extent) and abundance of Blasdale's bent grass with the conservation area.

3 Implementation

This section outlines the approach that will be to restore, manage, and monitor the 0.92-acres conservation area.

3.1 Habitat Management Plan

Restoration, management, and monitoring of the conservation area will be implemented as described in a habitat management plan (HMP), which will be:

- Developed following approval of conservation and development project by the County of San Mateo, and prior to the issuance of building permits and any ground disturbance as part of project implementation;
- Prepared by an ecologist or biologist with experience in the ecology of the coastal terrace prairie community and species, restoration and management of sensitive habitats, and monitoring of rare plant species;
- Developed in coordination with San Mateo County Parks Department (County Parks), to facilitate coordinated management of biodiversity and access within the Vallemar Bluffs Area; and
- Provided to the County of San Mateo, California Department of Fish and Wildlife, and the Coastal Commission for review and input.

The HMP will be developed based upon, and integrate, the goals, objectives, success criteria, and implementation framework outlined in this document. It will include the following sections:

- **Section 1-Introduction:** This approximately two-to-three-page section will provide background information about the conservation area and the management plan, including its purpose, development process, and contents/organization.
- **Section 2-Conservation Area Description:** This approximately 10-page section will describe key aspects of the conservation area that will influence their conservation and management. It will be developed based on a synthesis of information in prior surveys and reports including the *Vallemar Bluffs Botanical Survey Report* (JMc 2018).
- **Section 3-Goals, Objectives and Success Criteria:** This section will identify the desired outcomes of restoration and management of the conservation areas, which may be refined through further planning but are presented in Section 1 of this document.
- **Section 4-Management Approaches and Strategies:** This section will describe the restoration and management strategies and techniques that will be implemented to achieve the goals and objectives and success criteria.
- **Section 5-Monitoring:** This section will describe how the conservation area will be monitored to evaluate the effectiveness of the restoration and management strategies at achieving the goals and objectives, and identify changes that need to be made as part of the adaptive management framework.

- **Section 6-Plan Implementation and Adaptive Management:** This section will:
 - identify a schedule for implementation of restoration and management tasks;
 - estimate the costs for implementation of the restoration and management tasks;
 - describe how the tasks will be implemented by an implementing entity in coordination with the Moss Beach Associates, LLC, a homeowners' association, and the conservation easement holder;
 - outline how management of public access on the Bluff Trail will be coordinated with County Parks, if requested by the agency, to enhance effectiveness of their efforts to conserve rare species and provide public access on the Fitzgerald Marine Reserve lands;
 - outline the adaptive management process through which the plan will be implemented and updated over time, to address changed circumstances and new information.

Section 6 will be developed based upon the framework outlined below.

3.2 Implementation

3.2.1 Tasks and Schedule

Restoration and management will be implemented following a schedule provided in the HMP. The schedule will feature two main phases: initial tasks and ongoing tasks.

3.2.1.1 Initial Tasks

The initial tasks are those that will be initiated during the first 1-3 years to establish the conservation area and work to restore habitat therein.

1. Restoration activities within the estimated 0.71 acres plus the 270-foot-long trail alignments (Table 1, Figure 1) will be initiated during the same year when construction of the new homes begins, with restoration activities timed to occur in appropriate seasons. Restoration and management may begin prior to initiation and construction, in order to reduce costs associated with ongoing habitat degradation (e.g., the spread of ice plant).
2. Management activities to regulate access, including installation of fences and signage and monitoring to evaluate compliance, will be initiated during the first year of plan implementation (which will begin with development, if not prior).
3. Monitoring will be conducted to establish the baseline conditions that will be used to track changes in habitat over time and evaluate achievement of the success criteria for rare plants and habitat management.

3.2.1.2 Ongoing Tasks

Ongoing tasks are those that will be implemented in perpetuity to manage and monitor the habitat within the conservation area. They are anticipated to include:

1. Priority exotic plant control activities, to maintain or enhance the 0.71-acre restoration areas (Table 1, Figure 1) as well as the 0.23 acres within the conservation area.

2. Access management, including work to maintain the fences and signage and ensure that public and private access does not degrade the coastal terrace prairie or negatively impact the rare plant populations; and
3. Monitoring to assess the condition of the natural communities and rare plant populations within the conservation area, as well as identify anthropogenic factors that could impact them. Monitoring is anticipated to include:
 - a. Quarterly assessments of habitat conditions to identify anthropogenic factors are degrading habitat, such as incompatible access and exotic plants; and
 - b. Annual assessments of plant community composition and structure in the coastal terrace prairie and track the status and condition of rare plant populations.

3.2.2 Roles and Responsibilities

The following describes the roles and responsibilities for the parties who will be involved in protecting, restoring, and managing the conservation area, which are anticipated to include the following:

- **Moss Beach Associates, LLC (MBA):** the entity funding the conservation and development project;
- **Homeowners Association (HOA):** the association comprised of representatives of the four owners of the residential parcels that will be developed as part of the project;
- **Land Trust:** the entity that will be granted the conservation easement, which will be a tax-exempt nonprofit organization qualified under Section 501(c)(3) of the Internal Revenue Code and qualified to do business in California that has as its primary purpose the preservation, protection, or enhancement of land in its natural, scenic, historical, agricultural, forested, or open space condition or use.
- **Implementing Entity:** The entity that will be responsible for implementing the HMP by conducting the restoration, management, and monitoring tasks on the ground, in coordination with the other entities, as outlined below.
- **County of San Mateo:** The County Parks Department, which manages the adjacent Fitzgerald Marine Reserve, will be invited to coordinate with the other entities on management of the conservation area to facilitate more effective conservation-based management of the Vallemar Bluffs.

3.2.2.1 Moss Beach Associates, LLC

Moss Beach Associates, LLC, will be responsible for the following:

- Granting the conservation easement to the land trust including by funding the land trust's easement monitoring and defense as well as perhaps other tasks for the land trust such as baseline documentation;
- Establishing the HOA including developing the governing documents, including Covenants, Conditions, and Restricts (CC&Rs) and articles of incorporation, to describe its roles and

responsibilities for implementation of the HMP as well as perhaps other land use and management tasks it may assume;

- Funding implementation of the restoration element of the HMP, which will be initiated during the first three years of plan implementation and is anticipated to be completed within five years, though the actual timeline will be determined based on that required to achieve the success criteria;
- Funding and coordinating the implementation of the other initial conservation area establishment tasks, including installation of the fence and signage to delimit the conservation area;
- Participating in the annual conservation area management group meeting until the restoration success criteria are achieved, to discuss management and monitoring within the conservation area.

The MBA responsibilities will be completed once the restoration and conservation area establishment tasks have been successfully completed and the success criteria achieved. At that point, the HOA will assume responsibility for management and monitoring as described below.

3.2.2.2 Land Trust

The land trust who will be granted the conservation easement will be responsible for the following:

- Documenting the baseline conditions of the conservation easement area;
- Monitoring the conditions of the easement area, and comparing it to the baseline conditions to gauge compliance with the easement terms;
- Coordinating with the HOA and Implementing Entity regarding any easement issues including violations related to activities within the four lots;
- Coordinating with the County and Implementing Entity regarding any easement issues including violations that relate to activities originating on the County land including the right-of-way (Public Works) or Fitzgerald Marine Reserve (County Parks); and
- Participating in the annual conservation area management group meeting to discuss management and monitoring within the conservation area.

3.2.2.3 Homeowners Association

A homeowner's association (HOA) will be established for the four residential properties developed as part of the Valleamar Bluffs Conservation and Development Project. The HOA will be responsible for the following:

- Abiding by the terms of the conservation easement, CC&Rs, and HMP, which will collectively identify allowed and prohibited activities on the conservation area as well as the development areas within the four privately owned parcels;
- Contracting with and funding work by the Implementing Entity during the ongoing management phase (years 3+), including by:
 - Reviewing and approving annual work plans and budgets;

- Reviewing annual reports prepared by the implementing entity and making adjustments to land use activities to address any issues identified;
- Participating in the annual conservation area management group meeting to discuss management and monitoring within the conservation area.

3.2.2.4 Implementing Entity

The Implementing Entity will be a private business or non-profit organization that specializes in restoration ecology, management of conservation lands protected for biodiversity, and rare plant conservation biology. The entity will be responsible for the following:

- Preparing the annual work plans and budgets to implement the HMP, including the restoration plans during the initial management phase;
- Implementing independently and/or with the assistance of subcontractors, the restoration, management, and monitoring tasks outlined in the work plan;
- Preparing annual reports that document the tasks implemented and the status and condition of the habitat, including progress toward achieving success criteria;
- Participating in the annual conservation area management group meeting to discuss management and monitoring within the conservation area;
- Updating the HMP as part of the adaptive management process, to address changed circumstances including newly available scientific information, to ensure that the HMP continues to guide effective management to achieve the goals, objectives, and success criteria for the conservation area.

3.2.2.5 The County of San Mateo

County Parks will be invited to participate in the annual conservation area management group meeting to discuss management and monitoring within the conservation area. The purpose of their participation will be to facilitate more effective, coordinated management of the conservation areas on Vallemar Bluffs by sharing information as part of an adaptive management process. Coordination may also occur on an as needed basis with County Public Works staff, who are responsible for the right of way between the conservation area and Juliana Street.

3.3 Funding

Funding for all tasks associated with protecting, restoring, and managing the conservation area will be funded by Moss Beach Associates, LLC (the project developer) and the HOA.

3.3.1 Moss Beach Associates, LLC

Moss Beach Associates, LLC, will fund all of the initial tasks (Section 3.2.1.1), which are anticipated to include:

- Granting of the conservation easement to a 501(c)(3) land trust, which will require establishment of an endowment or payment of other fees to fund baseline easement documentation, easement monitoring, and legal defense in perpetuity;
- Funding the initial restoration and conservation area establishment and management tasks that will be implemented during the first three years, including but not limited to:
 - Installing infrastructure such as fences and signage to regulate access;
 - Implementing all restoration activities within the estimated 0.71-acre treatment areas, as well as 270 linear feet identified for de facto trail restoration (Table 1, Figure 1, Section 1.1.2);
 - Implementing baseline surveys to document initial conditions and then the initial years of monitoring to evaluate the effectiveness of the restoration treatments over an anticipated three-year period;
 - Conducting remedial restoration and management actions, as needed to achieve the restoration success criteria.

Moss Beach Associates, LLC will also fund the suite of avoidance, minimization, and mitigation measures during project construction, including worker awareness trainings and biological construction monitoring, which will limit the effects of construction on the conservation area and adjacent Fitzgerald Marine Reserve (JMc 2018).

3.3.2 Homeowner's Association

The HOA will be responsible for funding the ongoing management and monitoring costs for the conservation area. Members of the HOA will make monthly contributions to the annual management and monitoring fund, which will be administered by the HOA. The amount that will be paid each year will be based on the estimated annual management and monitoring costs, which will be estimated by the management implementing entity in an annual work plan. The annual work plan tasks will reflect any management needs identified in the prior year's annual report as well as the ongoing management, maintenance, and monitoring tasks as outlined in the HMP and modified through the adaptive management framework. The annual budget will include costs for remedial actions as well as a contingency fund, which will be designed to ensure sufficient funds for management are available should additional needs arise. Any funds that remain at the end of the year will be applied to the subsequent year's management and monitoring.

3.4 Costing

The costs for implementing the HMP will be identified in the HMP using a Property Analysis Record (PAR) or PAR-like analysis. In this approach, the costs for restoration, management, and monitoring will be identified in two main categories:

1. **Initial and Capital Costs:** These are the initial costs to establish the conservation area, and conduct restoration during the first approximately three years of project implementation, which will be borne by Moss Beach Associates (Section 3.3.1); and
2. **Ongoing Costs:** These are the ongoing costs to manage and monitor the conservation area, including to address any emerging conservation and management needs, which will be funded

by the HOA (Section 3.3.2).

The cost estimates will be based on 2018 dollars and account for inflation based on the average consumer price index for the past 5 years, or other appropriate financial forecasting. The cost estimate will include the estimated costs for the specific tasks to restore, manage, and monitor the conservation area, as detailed in the HMP. It will also include the following:

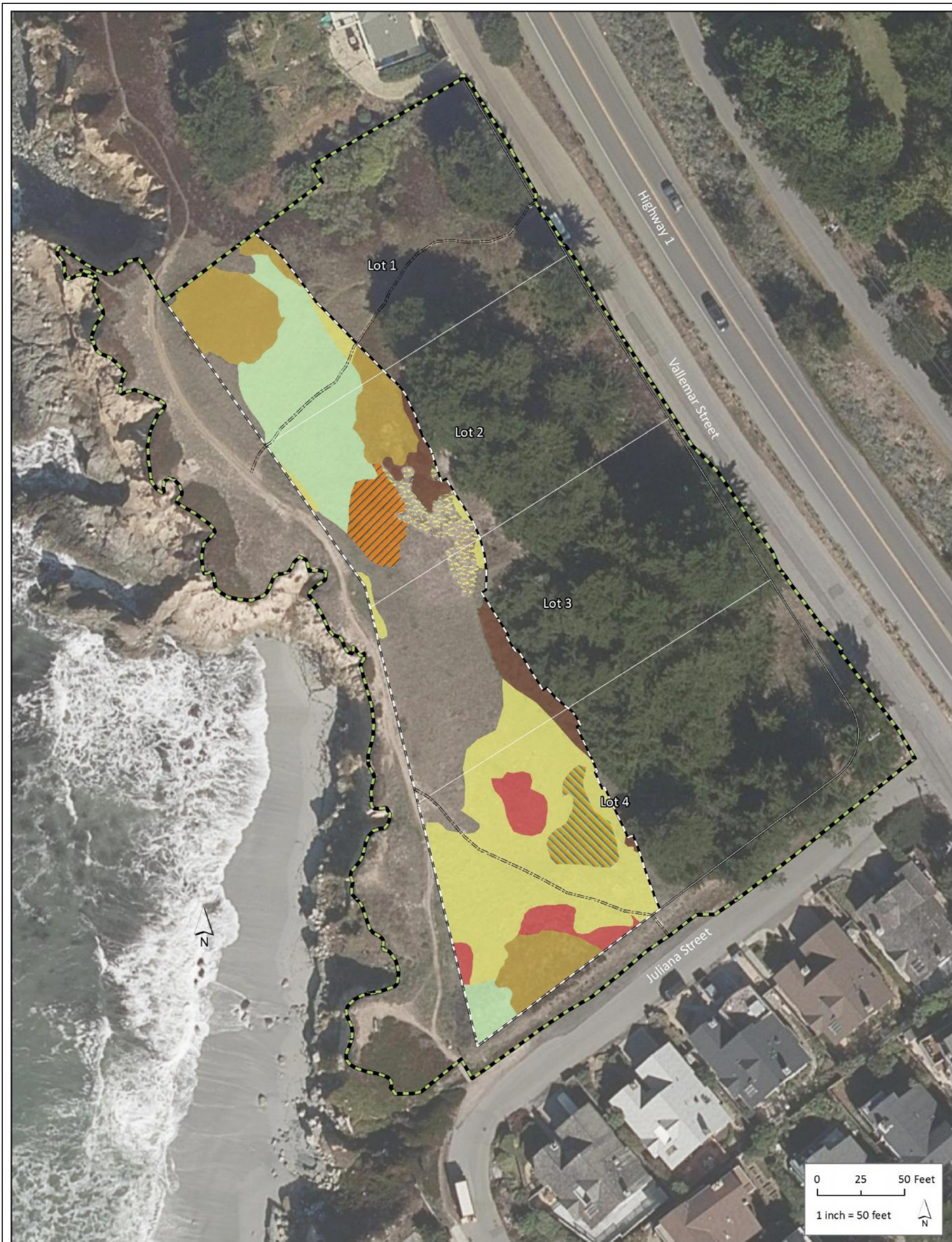
1. **Contingency:** additional funds that may needed to achieve the plan’s success criteria by increasing the level of effort, adjusting the techniques used to enhance effectiveness, or implementing additional tasks that were not anticipated. That is, the contingency will be used to address underestimates in the budget line items as well as omitted line items.
2. **Remedial Actions:** An estimate of the additional costs that will be needed to ensure achievement of the plan’s success criteria if/when the planned tasks prove insufficient, including as a result of changed circumstances (e.g., invasion of a new exotic plant).

These cost estimates in the HMP will be provided for planning purposes only and will not be designed to define the minimum or maximum financial obligation of the parties who will be funding the restoration, management and monitoring. Instead, Moss Beach Associates, LLC. and the HOA will be responsible for fully funding the actual initial and capital costs (MBA), and the ongoing costs (HOA), which may differ from that estimated in the HMP (Section 3.3).

Table 1: Proposed Restoration Areas

Restoration Treatments	Square Feet	Acres
Address Unnatural Topography (Mound)	1,358	0.0312
Address Unnatural Topography (Swale)	1,297	0.0298
Control Dense Exotic Grasses and Forbs	10,568	0.2426
Control Invasive Plants	1,700	0.0390
Manage Native Disturbance-Adapted Plants	6,747	0.1549
Remove Ice Plant Mats	5,991	0.1375
Remove Planted/Ornamental Species	1,867	0.0429
Remove Wood Chips	1,366	0.0314
Total	30,894	0.7092
Establish Native Plants on <i>De Facto</i> Trails ¹	270 lineal feet	

¹ The trails overlap other restoration areas so their area was not included in the total treatment area



Vallemar Bluffs: Conservation and Restoration Areas

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| Restore De Facto Trails | Remove Wood Chips |
| Restore | Remove Ice Plant Mats |
| Address Unnatural Topography (Mound) | Control Invasive Plants |
| Address Unnatural Topography (Swale) | Control Dense Exotic Grasses and Forbs |
| Remove Planted/Ornamental Species | Manage Native Disturbance-Adapted Plants |
| Conservation Area (0.92 acres) | Study Area Boundary |

Moss Beach Associates Project

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|-------------------|
| Property Boundary |
| Proposed Parcels |

Sources: JMc, Ifland Survey



Figure 1: Conservation and Restoration Areas