



## MEMORANDUM

**DATE:** March 24, 2026  
**TO:** Coastal Permit Administrator  
**FROM:** Rob Fitzsimmons, Planner III  
Planning & Building Services  
**SUBJECT:** Revision to CDP\_2022-0017 Recommended Conditions of Approval incorporating 2/18/2026 CDFW comments

On 2/18/2026, the California Department of Fish and Wildlife provided the following comment on this project:

*CDFW in our Trustee agency role provides the following comments and recommendations to assist the County in its role as lead agency in assessing a project's potential impacts.*

- 1. No biological information was included in the referral. The trees that were removed are not identified in the photo provided, but based on the photo, there may have been a combination of tree species present. The trees were identified as "cypress," in the CDP application. While Mendocino cypress (*Hesperocyparis pygmaea*) can grow over 100 feet in nutrient-rich soil, it has not been documented to grow on the south coast's bluff tops. Some of the trees in the photo are most likely Monterey cypress (*Hesperocyparis macrocarpa*). Monterey cypress is not native to Mendocino county and is on the CallIPC watchlist for Mendocino county. In the email below, the Coastal Commission recommended the trees be planted with native trees at a 1:1 ratio.*

**Recommendation 1:** *If the tree replacement will be at a 1:1 ratio, require a performance standard of 100% tree survival after 5 years. Alternatively, require the planting of native trees at a 1:1 ratio as well as understory shrub species with 75% survival after 5 years. The planting of understory shrubs would provide a more natural and protective setting for the trees to grow.*

**Recommendation 2:** *The planting palette should be limited to locally appropriate native tree and shrub species such as: Bishop pine (*Pinus muricata*) and grand fir (*Abies grandis*) and shrubs such as: ceanothus (*ceanothus thrysiflorus*), California coffeeberry (*Frangula californica*), or Pacific madrone (*Arbutus menziesii*). The planting palette should include a minimum of two tree species from the list above and include at least two of the shrub species.*

**Recommendation 3:** *non-native tree species such as Monterey pine and Monterey cypress saplings should be removed to prevent their re-growth on the bluff top.*

**Recommendation 4:** *native tree and shrub species that naturally re-generate on the bluff top should be retained.*

Staff recommend incorporating the recommendations into the Conditions of Approval, as follows (added language appears underlined and in red):

- 8. The stumps and root structures of all seven removed trees identified on the Site Plan shall remain in situ. Removal of any of them shall require modification of this Coastal Development Permit and additional review and possible mitigation for erosion and blufftop geological stability. Native tree and shrub species that naturally re-generate on the bluff top shall be retained. Should saplings of nonnative tree species such as Monterey pine (*Hesperocyparis pygmaea*) and Monterey cypress (*Hesperocyparis macrocarpa*) be discovered onsite, they shall be removed to prevent their re-growth on the bluff top.*
- 9. The seven removed trees shall be replaced onsite at a one to one ratio, with native and locally appropriate tree species, including both Bishop Pine (*Pinus muricata*) and grand fir (*Abies grandis*). Within 90 days of the completion of the California Coastal Commission appeal period for this project, the applicant shall submit a landscape plan to the Planning and Building Services Department. Subject to the review and approval of the Coastal Permit*

Administrator, the plan shall identify the species and planting locations for shrubs and no less than seven trees to be planted onsite. Shrubs to be planted onsite shall include at least two of the following species: ceanothus (*ceanothus thyrsiflorus*), California coffeeberry (*Fragula californica*), or Pacific madrone (*Arbutus menziesii*). Upon Coastal Permit Administrator approval of the landscape plan, all new trees and shrubs identified thereon shall be planted within one year. For five years following the planting, the applicant shall annually submit photographic evidence of the trees growth and survival to the Planning and Building Services Department. If understory shrub species are planted immediately surrounding the new trees, tree survival at the end of five years must be at least 75% (i.e. at least six of the seven newly-planted trees must survive). If no understory shrubs are planted, tree survival at the end of five years must be 100%. Should the tree planting fail to meet this standard, a new landscape plan shall be submitted by the applicant to the Planning and Building Services Department showing additional planting, subject to the same review, approval, and performance standards of the initial plan, with a new five year annual reporting timeline.

The proposed revisions to Recommended Condition 8 incorporate CDFW's recommendations 3 and 4, and the revisions to Condition 9 incorporate CDFW recommendations 1 and 2.

Staff feel CDFW's comments and the recommended revised conditions do not necessitate revision of the Findings as presented in the Staff Report; they remain valid as written.