

MONTEREY COUNTY ZONING ADMINISTRATOR

Meeting: March 13, 2008. Time: P.M.	Agenda Item No.:
Project Description: Coastal Development Permit to allow development within 100 feet of environmentally sensitive habitat area to include removal of invasive plant species (ice plant and European beach grass) to promote the natural establishment of native plant species which would benefit habitat for threatened or endangered species known to occur at the site (Snowy Plover, Smith's Blue Butterfly, Legless Lizard, Monterey Gilia, and Menzies Wallflower).	
Project Location: Highway 1 & Del Monte Blvd (Martin Dunes), North of the City of Marina	APN: 229-021-002-000
Planning File Number: PLN070565	Name: Big Sur Land Trust, Property Owner Scott Hennessy, Agent
Plan Area: North County Land Use Plan	Flagged and staked: No
Zoning Designation: : RC (CZ) [Resource Conservation (Coastal Zone)]	
CEQA Action: Categorically Exempt per Section 15333	
Department: RMA - Planning Department	

RECOMMENDATION:

Staff recommends that the Zoning Administrator approve the Coastal Development Permit based on the Findings and Evidence (**Exhibit B**) and subject to the recommended Conditions (**Exhibit C**).

PROJECT OVERVIEW: The project involves a Coastal Development Permit to allow the restoration of 125 acres including removal of non-native invasive plants, specifically iceplant and European beachgrass, at the Martin Dunes property south of the Salinas River National Wildlife Refuge and North of Fort Ord Dunes State Park. Removal of invasive species will enhance the natural habitat and benefit up to six (6) federally or state listed species that are known to occur at the site. Primary issues involve temporary disturbance to public access and recreation and herbicide treatment within sensitive habitat at the site creating the potential for impacts on endangered species. The project will be implemented in phases starting with marking of sensitive plant and animal locations and training of volunteers regarding best management practices to avoid marked locations of sensitive species. A biological opinion prepared by the United States Fish and Wildlife Services was issued regarding the projects impacts. Access will be temporarily closed to the public during the treatment and recovery period. However, access is available to the north at the Salinas Wildlife Refuge. While there are some potential for direct impacts to sensitive species during the treatment and hand-pulling phases, the project has been designed to avoid and reduce impacts to the maximum extent and will have an overall benefit to sensitive and non-sensitive species at the site. As proposed and conditioned, staff finds that the proposed project is consistent with the LCP policies and can be categorically exempt from CEQA.

See Exhibit A for a more detailed discussion.

OTHER AGENCY INVOLVEMENT:

- ✓ North County Fire Protection District
- ✓ Public Works Department
- ✓ Environmental Health Division
- ✓ Water Resources Agency
- ✓ Agricultural Commissioner
- ✓ California Coastal Commission
- ✓ California Department of Fish and Game
- ✓ United States Fish and Wildlife Services

The above checked agencies and departments have reviewed this project. There were no Conditions recommended by any of the above agencies. The Resource Management – Planning Department recommended conditions have been incorporated into the condition compliance reporting plan (**Exhibit C**).

On January 22, 2008 the North County Coastal Land Use Advisory (LUAC) voted 3 to 0 to approve the project as proposed. There were no comments or concerns.

Note: The decision on this project is appealable to the Board of Supervisors and the California Coastal Commission.

Craig Spencer
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February 13, 2008

cc: Front Counter Copy, Zoning Administrator; Laura Lawrence, Acting Planning Services Manager; Craig Spencer, Planner; Carol Allen, Big Sur Land Trust, Applicants; Scott Hennessey, Agent; Planning File PLN070565.

Attachments:	Exhibit A	Project Discussion
	Exhibit B	Recommended Findings and Evidence
	Exhibit C	Recommended Conditions of Approval
	Exhibit D	Vicinity Map
	Exhibit E	Project Description and Implementation
	Exhibit F	Site Plans and Aerial Maps
	Exhibit G	LUAC Minutes
	Exhibit H	United States Fish & Wildlife Services Biological Opinion
	Exhibit I	USFWS NEPA Exclusion

This report was reviewed by Laura Lawrence, Acting Planning Services Manager

EXHIBIT A
PROJECT DISCUSSION
PLN070565 (Big Sur Land Trust)

I. PROJECT SETTING AND DESCRIPTION:

Setting

The project site is approximately 125 acres located west of Highway 1, south of the Salinas River National Wildlife Refuge and north of the City of Marina and Fort Ord Dunes State Park. It is currently zoned Resource Conservation in the Coastal Zone and is native dunes habitat with a thin strip of maritime chaparral providing a buffer on the eastern side of the property between the project site and the neighboring properties to the east which are in agricultural row crop production. To the west lies the Pacific Ocean. The lot is undeveloped and contains a mixture of sensitive native dune habitat vegetation and associated wildlife with a severe infestation of iceplant (approximately 45% ground cover) in addition to four locations of European Beach Grass. There are existing public access trails winding through the site.

Project Description

The project consists of a phased approach to eliminate or reduce the invasive plants which would promote native habitat for plant and animal species at the site. Project activities would take approximately two years to complete.

A: Preparation Phase

The project will commence by design with the Preparation Phase. The Preparation Phase consists of a botanical survey during the flower season, in the spring and summer months to locate, flag, and map, using GPS, sensitive species populations. A survey was conducted by Heather Brady, a Fish and Wildlife Services authorized biologist in the summer months of 2007. Also the Point Reyes Bird Observatory data will be used to locate snowy plover nesting sites. This will be used to alert herbicide applicators to the known locations to avoid to the maximum extent potential impacts to sensitive species. There will be no herbicide treatment, only hand-pulling, within 10 feet of these locations. Prior to implementation of Phase I (invasive plant removal - year 1), the herbicide applicators and volunteers will be trained by a United States Fish and Wildlife Services (USFWS) approved biologist on how to identify and avoid disturbing sensitive plant species.

B: Phase I – Invasive Plant Removal (Year 1)

According to the Big Sur Land Trust, a qualified licensed herbicide applicator with experience completing sensitive vegetation restoration projects will be hired to treat an area spanning approximately 40 acres. Within the 40 acres, a much smaller acreage of impact will occur because the herbicide treatment areas will be focused on those areas currently supporting a high density of ice plant communities. Treatment will be accomplished using backpack sprayers and/or hand-held sprayers attached to all terrain vehicles via a hose unit containing a 2-percent solution of glyphosate with the addition of 1-percent surfactant. The use of a licensed herbicide applicator eliminates the need for contact with the Monterey County Agricultural Commissioners Office who regulates pesticide and herbicide use within the County. The Fish and Wildlife Services Biological opinion places specific use restrictions [Biological Opinion, Appendix A (Exhibit H)] on the application of the herbicide which has been adopted on a procedural level for the project and are included in the conditions of approval (Condition #3). These restrictions include application methods and times inappropriate for application to prevent drift of herbicide application (wind, rain and other weather related criteria). Applicators and volunteers will access the site using existing trails. Treatment will occur during the mid to late fall (between October 1

and March 1), to minimize effects on herbaceous species, nesting snowy plovers, and Smith's blue butterfly. In the low density and isolated iceplant invasion portions of the property, hand-pulling rather than herbicide treatment will be used. Treated iceplant will be left in place to decomposed and form a catchment basin for native seeds. Hand-removed iceplant will be piled on site in a manner that inhibits re-rooting.

The four locations of European Beachgrass will be pulled by hand and the remaining sand substrate will be raked to a depth of 1.5 feet. European Beachgrass debris will be removed from the site in black plastic bags.

C: Phase II – Non-Native Plant Removal (Year 2)

Phase II will consist of follow up treatments consistent with Phase I where re-growth occurs or in areas missed during Phase I to prevent re-spouting.

II. ANALYSIS:

Project Goals

The project does not include construction of structures, grading, uses of any kind, or any alteration in lot size or configuration. The project includes discharge of herbicide liquids, and removal of non-native vegetation within an environmentally sensitive habitat. Biological resources and sensitive habitat are the main project components. The Martin Dunes site has been identified as critical habitat and targeted by the United States Fish and Wildlife Services (USFWS) for conservation to promote connectivity and habitat to aid in the recovery of listed species. The number one threat to the coastal dune habitat at the site is non-native plant invasion. The goal of the Big Sur Land Trust and the project is to aid in the recovery of five federally listed species and one state special-status species at the site. These species include the Western snowy plover (threatened), Smith's blue butterfly (endangered), Monterey spineflower (threatened), Monterey gilia (endangered), Menzies' wallflower (endangered), and California legless lizard (California species of special concern). Although these are the targeted species the restoration will likely help other special-status species at the site.

Title 20 Zoning

The Marin Dunes site is zoned Resource Conservation in the Coastal Zone (RC (CZ)). The proposed project echoes the purpose of the RC zoning, which is to provide a district to protect, preserve, enhance, and restore sensitive resource areas (20.36.010). Uses allowed within this zoning district, subject to a Coastal Administrative Permit in each case include restoration and management programs for fish, wildlife, or other physical resources. Therefore the project is not only consistent with zoning for the parcel, it is encouraged.

State and Federal Permit Requirements

The USFWS has, pursuant to Section 7 of the Endangered Species Act (ESA), provided a formal consultation with the Big Sur Land Trust (BSLT) which authorizes incidental take for projects such as restoration where actions do not jeopardize listed species or destroy or adversely modify critical habitat. The Big Sur Land Trust has worked in conjunction with the USFWS to design and apply reasonable a prudent measures to minimize the potential for take. BSLT must carry out and comply with the regulations contained in the formal biological opinion.

The California Department of Fish and Game (DFG) has been in contact with the USFWS during the formal consultation process mentioned above due to the existence of state-listed species at the site. The DFG has a slightly different code than their federal counter parts. DFG has identified the need for some type of permit authorization along the same lines as a minor incidental take permit. Conditions have been incorporated in the project to require all necessary

state permits be obtained prior to commencement of removal activities. Consultation with the DFG indicates that section 2081(a) of the Fish and Game Code may apply.

North County Land Use Plan (LUP)

A: Environmentally Sensitive Habitats

The North County LUP Section 2.3 Key Policy 2.3.1, along with the Coastal Act plans and policies, again, echoes the idea and importance of protecting, maintaining, and, where possible, enhancing and restoring sensitive habitat. The LUP reiterates several times an objective of “long-term maintenance” of sensitive resources and planting with native species in both landscaping and restoration of disrupted areas. Specific policy 2.3.3.A.6 promotes restoration to natural conditions and 2.3.3.A.8 states, “*The dune area between the City of Marina and the Salinas River along Monterey Bay should be acquired by the U.S. Fish and Wildlife Service or the State Department of Fish and Game and managed as a wildlife reserve.*” The Big Sur Land Trust has acquired the Martin Dunes property. They are a non-profit conservancy agency that promotes the intent of acquisition by USFWS or Department of Fish and Game. North County LUP recommended action 2.3.4.5 states “*The County should encourage the restoration of sensitive plant habitats on public and private land. A program to control invasive non-native vegetation should be developed in conjunction with the State Department of Parks and Recreation, State Department of Fish and Game, U.S. Forest Service and the County.*” The Big Sur Land Trust has worked closely with USFWS for the invasive plant removal project at Martin Dunes to identify and incorporate all reasonable and prudent measures in this project-specific invasive vegetation removal program. In all, the LUP repeats many of the same goals and objectives throughout the policies regarding environmentally sensitive habitat which indicate that the project is appropriate and should be encouraged.

B: Recreation

North County LUP specific policies section 4.3.6.C designates the coast line and dunes areas as appropriate for low-intensity recreational use. The North County LUP trails map Figure 6 shows existing public access trails through the site. Recreation management policy 4 states that “*Adequate supervision and maintenance of beach and due recreation areas shall be provided as necessary to protect visitor safety and the natural resources of the area. Damaged dunes shall be restored, replanted with native vegetation, and closed to use during the period of recovery.*” The period in the case of the Big Sur Land Trust, Martin Dunes project, is between October 1 and March 1 when herbicide treatments occur. Recreation and access at the site will be temporarily closed from October 1 to March 1 during herbicide treatment periods. Closure during the winter months will provide the least impact to beach and trail access as the demand or intensity of access at this period of the year can be reasonably presumed to be lower than other periods of the year due to weather conditions. Closure is part of recreation management policies contained in the North County LUP and eliminates the need for discussion regarding potential herbicide effects on the public. Project activities will not substantially deteriorate existing public recreational facilities and there will be no long-term adverse impacts to access at the site. Lateral access can still be obtained from Del Monte Blvd. to the north at the Salinas River Wildlife Refuge.

III. ENVIRONMENT

National Environmental Policy Act (NEPA)

The project is being funded with grants from the USFWS, a federal agency. Due to the funding the project is subject to NEPA review. USFWS has evaluated and conducted analysis on the

proposed funding under the Endangered Species Act and NEPA. USFWS staff reviewed the site and the proposed activities and found that a categorical exclusion could be applied for the proposed project and funding, under the specific exclusions afforded to the Department of Interior.

California Environmental Quality Act (CEQA)

The project was determined to be categorically exempt per section 15333 Class 33 which provides an exemption for minor alterations to vegetation, not to exceed five acres in size, on existing officially designated wildlife management areas which result in improvement of habitat for wildlife resources. Although the project will cover a general area of about 40 acres, the impact area within that 40 acres, where iceplant communities exist will be significantly less, making the impact area within the five acre maximum for the exemption.

Due to the sensitive biological habitat at the Martin Dunes property, there is a potential for impacts and incidental take of listed species during project activities. The risks arise from access through the site for volunteers and treatment of vegetation with herbicide. There is a possibility that through access to the site, sensitive plants could be trampled or buried and sensitive species co-existing within the iceplant invaded areas could be impacted by the herbicide treatment. These impacts have been limited by design which are reflected in the project description above and contained in the criteria set forth in the USFWS biological opinion. According to the USFWS biological opinion, with reasonable and prudent measures in place, project activities may affect but are not likely to adversely affect sensitive species at the site and project activities are not likely to jeopardize the continued existence of sensitive species.

Several factors have been evaluated in making the CEQA determination including the projects consistency with the Local Coastal Plan, which is the programmatic equivalent of an EIR, the NEPA determination from USFWS, and review for exemption and exception to the exemptions. Possible exceptions to the exemption would apply due to the potential to impact sensitive resources at the site; however, the project is bound to implement policies and procedures in the USFWS biological opinion which avoid net loss of habitat and net reduction in the affected species.

The project mitigates within its self by design and purpose, by enhancing habitat and contributing to the continued long term maintenance of affected species [CEQA 15065(b)(2)]. This evidence indicates that the project will not have an adverse effect on sensitive species and recreation at the site, and therefore, the environment.

EXHIBIT B

RECOMMENDED FINDINGS AND EVIDENCE

1. **FINDING:** **CONSISTENCY** – The project, as described in Condition No. 1 and as conditioned, conforms to the policies, requirements, and standards of the Monterey County General Plan, North County Land Use Plan, Coastal Implementation Plan Part 2, and the Monterey County Zoning Ordinance (Title 20), which designates this area as appropriate for conservation and enhancement of environmental resources.

- EVIDENCE:**
- (a) Plan Conformance The text, policies, and regulations in the above referenced documents have been evaluated during the course of review of applications. No conflicts were found to exist. No communications were received during the course of review of the project indicating any inconsistencies with the text, policies, and regulations in these documents.
 - (b) Zoning Consistency The property is located at Highway 1 and Del Monte Blvd (Assessor’s Parcel Number 229-021-002-000), north of the City of Marina, North County Land Use Plan. The parcel is zoned Resource Conservation in the Coastal Zone (“RC (CZ)”) which allows as a principal use restoration and management plans for fish, wildlife, or other physical resources subject to a Coastal Administrative Permit in each case.
 - (c) Site Visit The project planner conducted a site inspection on February 15, 2008 to verify that the project on the subject parcel conforms to the plans listed above.
 - (d) Biological Resources The Martin Dunes site is identified as an environmentally sensitive habitat in the North County Land Use Plan and by the United States Fish and Wildlife Services (USFWS). Project activities associated with invasive plant removal including access and herbicide treatments at the site may affect but are not likely to adversely affect sensitive species and long-term effects of the project are expected to be beneficial to these species. Pursuant to section 7 of the Endangered Species Act (ESA), the USFWS has permitted the funding and activities at the Martin Dunes property through a formal consultation resulting in a biological opinion. Reasonable and prudent measures have been adopted within the plan proposal and implementation consistent with the ESA to avoid and reduce project impacts on sensitive species. The purpose and intent of the project is to promote native habitat to aid in recovery of the sensitive species at the site and will be beneficial to these and other species in the long-term. Potential initial impacts due to project activities would not jeopardize the continued existence of any species. The North County LUP and the Coastal Act both stress the idea and importance of protecting, maintaining, and, where possible enhancing and restoring sensitive habitat (Key Policy 2.3.2.1). Permits or permission from the California Department of Fish and Game (DFG) are still necessary. Condition 6 requires the BSLT to obtain permits for the DFG prior to invasive plant removal activities.
 - (e) Public Access Existing public access and trails are shown on Figure 6 of the North County LUP. Access and trails will be temporarily closed while herbicide treatments are conducted (Policy 4.3.6.C, Recreation Management item 4). See Findings and Evidence 3 and 6 for more information.

- (f) LUAC The project was referred to the North County Land Use Advisory Committee (LUAC) for review. On January 22, 2008, the North County LUAC unanimously voted to recommend approval of the project without citing any concerns or recommended changes.
- (g) Application The application, project plans, and related support materials submitted by the project applicant to the Monterey County RMA - Planning Department for the proposed development found in Project File PLN070565.

2. **FINDING: SITE SUITABILITY** – The site is physically suitable for the use proposed.

- EVIDENCE:**
- (a) The project has been reviewed for site suitability by the following departments and agencies: RMA - Planning Department, North County Fire Protection District, Public Works, Environmental Health Division, and Water Resources Agency. Additionally Parks, the Agricultural Commissioner, United States Fish and Wildlife Services, The California Department of Fish and Game, and the California Coastal Commission were consulted. There has been no indication from these departments/agencies that the site is not suitable for the proposed development. Conditions recommended have been incorporated.
 - (b) The USFWS biological opinion indicated that there are no physical or environmental constraints that would indicate that the site is not suitable for the use proposed. County staff concurs. The following reports have been prepared:
 - i. “Intra-Service Biological Opinion on the U.S. fish and Wildlife Service’s Proposed Funding of the Martin Dunes Invasive species Removal Project” (LIB080001) prepared by Assistant field Supervisor, Ventura Fish and Wildlife Office, Ventura, CA, October 11, 2007.
 - (c) Staff conducted a site inspection on February 15, 2008 to verify that the site is suitable for this use.
 - (d) Materials in Project File PLN070565.

3. **FINDING: CEQA (Exempt):** - The project is categorically exempt from environmental review and no unusual circumstances were identified to exist for the proposed project.

- EVIDENCE:**
- (a) California Environmental Quality Act (CEQA) Guidelines Section 15333, categorically exempts projects not to exceed five acres in size to assure the maintenance, restoration, enhancement, or protection of habitat for plants and wildlife.
 - (b) Vegetation management and restoration are encouraged by the adopted Local Coastal Plan which is the programmatic equivalent of an EIR. The project mitigates within its self by design and by purpose by enhancing habitat and contributing to the continued long term maintenance of affected species [CEQA 15065(b)(2)].
 - (c) Temporary impacts from project activities will not jeopardize the continued existence of sensitive species.
 - (d) The project is being partially funded by the United States Fish and Wildlife Services and has been evaluated by them under the National Environmental Policy Act (NEPA). USFWS has concluded in their formal evaluation that the proposed project can be categorically excluded from NEPA.

- (e) Project activities will not substantially deteriorate existing public recreational facilities and there will be no long-term adverse impacts to access at the site. Lateral access can still be obtained from Del Monte Blvd. to the north at the Salinas River Wildlife Refuge.
- (f) No adverse environmental effects were identified during staff review of the development application or during a site visit on February 15, 2008.
- (g) See findings 1 and 2 above with supporting evidence.
- (h) Meeting with California Department of Fish and Game on February 14, 2008.
- (i) Consultation with the USFWS on February 22, 2008.
- (j) Consultation with the California Coastal Commission on February 21, 2008.
- (k) The area of impact is less than 5 acres.

4. **FINDING: NO VIOLATIONS** - The subject property is in compliance with all rules and regulations pertaining to zoning uses, subdivision, and any other applicable provisions of the County's zoning ordinance. No violations exist on the property. Zoning violation abatement costs, if any, have been paid.

EVIDENCE: Staff reviewed Monterey County RMA - Planning Department and Building Services Department Monterey County records and is not aware of any violations existing on subject property.

5. **FINDING: HEALTH AND SAFETY** - The establishment, maintenance, or operation of the project applied for will not under the circumstances of this particular case be detrimental to the health, safety, peace, morals, comfort, and general welfare of persons residing or working in the neighborhood of such proposed use, or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.

EVIDENCE: Findings (1)(d & e), (2)(b), and (3) above.

6. **FINDING: PUBLIC ACCESS** – The project is in conformance with the public access and public recreation policies of the Coastal Act and Local Coastal Program. No access is required as part of the project as no substantial adverse impact on access, either individually or cumulatively, as described in Section 20.70.050.B.4.c of the Monterey County Coastal Implementation Plan, can be demonstrated.

EVIDENCE: (a) The project site is located in an area shown in the North County Land Use Plan Trails Plan maps as an area with existing public trails and lateral beach access (Figure 6). The project, invasive plant removal and native plant restoration, will not substantially deteriorate existing public recreational facilities and there will be no long-term adverse impacts to access at the site.

(b) No development is proposed which would necessitate a shoreline protective device or public maintenance area.

(c) Public access will be temporarily restricted during herbicide treatment periods, in accordance with the North County LUP Recreation Management Policies, between October 1 and March 1 established to avoid snowy plover nesting season and Smith's blue butterfly migrations. Lateral beach and trails access will still be available from Del Monte Blvd. to the north at the Salinas River National Wildlife Refuge.

(d) Staff site visit on February 15, 2008.

7. **FINDING: APPEALABILITY** - The decision on this project is appealable to the Board of Supervisors and the California Coastal Commission.

EVIDENCE: (a) Section 20.86.030 of the Monterey County Coastal Implementation Plan - Part 1 (Board of Supervisors).

(b) The project may be appealed to the California Coastal Commission pursuant to Section 20.86.080 of the Monterey County Coastal Implementation Plan - Part 1 because projects located within 100 feet of environmentally sensitive habitat are subject to a Coastal Development Permit (Conditional Use).

<i>Permit Cond. Number</i>	<i>Mitig. Number</i>	<i>Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department</i>	<i>Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.</i>	<i>Responsible Party for Compliance</i>	<i>Timing</i>	<i>Verification of Compliance (name/date)</i>
2.		PD002 - NOTICE-PERMIT APPROVAL The applicant shall record a notice which states: "A permit (Resolution 070565) was approved by the Zoning Administrator for Assessor's Parcel Number 229-021-002-000 on March 13, 2008. The permit was granted subject to 6 conditions of approval which run with the land. A copy of the permit is on file with the Monterey County RMA - Planning Department." Proof of recordation of this notice shall be furnished to the Director of the RMA - Planning Department prior to issuance of building permits or commencement of the use. (RMA - Planning Department)	Proof of recordation of this notice shall be furnished to the RMA - Planning Department.	Owner/ Applicant	Prior to commencement of project activities	
3.		PD016 – NOTICE OF REPORT Prior to issuance of building or grading permits, a notice shall be recorded with the Monterey County Recorder which states: "A Biological Opinion has been prepared for this parcel by the United States Fish and Wildlife Services, dated October 11, 2007 and is on record in the Monterey County RMA - Planning Department , Library No. LIB080001. All development shall be in accordance with this report." (RMA – Planning Department)	Proof of recordation of this notice shall be furnished to the RMA - Planning Department.	Owner/ Applicant	Prior to commencement of project activities	
4.		PD032 - PERMIT TIME/YEAR & DATE The permit shall be granted for a time period of 3 years, to expire on March 13, 2011 (RMA – Planning Department)	None	Owner/ Applicant	As stated in the conditions of approval	

<i>Permit Cond. Number</i>	<i>Mitig. Number</i>	<i>Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department</i>	<i>Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.</i>	<i>Responsible Party for Compliance</i>	<i>Timing</i>	<i>Verification of Compliance (name/date)</i>
5.		<p>PDSP001 – SUCCESS CRITERIA AND REPORTING (NON-STANDARD) Consistent with, and in addition to, the Reporting Requirements contained in the USFWS biological opinion, the Big Sur Land Trust must provide a written report to the Director of Planning within 12 months following completion of invasive plant removal activities indicating compliance with the terms and policies of the biological opinion issued by USFWS. (RMA – Planning Department)</p>	The applicant shall submit a written report within 12 months following invasive plant removal to the Director of Planning, for review and approval, demonstrating compliance with the requirements contained in the USFWS biological opinion issued for the project dated October 11, 2007.	Applicant/ Owner/ Biologist/ USFWS	Within 12 months following completion of invasive plant removal.	
6.		<p>PDSP002 – OTHER AGENCY PERMITS (NON-STANDARD) If required, prior to commencement of any project activities, obtain clearance and/or permits from the following agencies:</p> <ul style="list-style-type: none"> a. California Coastal Commission b. U.S. Army Corps of Engineers/ACOE (401/404) c. California Department of Fish & Game (1601) d. Monterey Bay National Marine Sanctuary (MBNMS) <p>(RMA-Planning Department)</p>	Contact and obtain required clearances and/or permits from the appropriate agencies for the proposed project. Submit evidence, for review and approval, to the RMA-Planning Department that clearance and/or permits have been obtained or were not required.	Owner/ Applicant	Prior to commencement of project activities	