

November 13, 2012

Mr. Chairman, members of the Board,

Relative to the LCPA Part 1, Biological Resources, and Part 2, Agricultural Resources, we request that the Terrestrial ESHA description include Coastal Prairie/Grassland in the Proposed Edit, C-BIO-1, Environmentally Sensitive Habitat Areas.

This request is supported in the current issue of **Fremontia**, the Journal of the California Native Plant Society, Vol. 39, May/September 2011. Coastal Prairies are described as occurring in northern Marin and southern Sonoma counties "almost entirely on the 5 million year old Wilson Grove Formation", a fossil bearing marine sediment. The entire northern part of Marin's Coastal zone from Walker Creek to the Sonoma County line and from Dillon beach to Highway 1 in Tomales is underlain with the Wilson Grove Formation. Coastal Prairie is associated with this geological structure.

Biologically this Terrestrial ESHA plant community is very important for the survival of the American badger, White tailed Kite and the Northern Harrier. All three are California Species of Special Concern and have been observed on agricultural land surrounding the Estero de San Antonio in the Tomales area.

Agriculturally, this plant community is vitally important for the maintenance of healthy grazing lands. Studies begun in 2008 (**Fremontia**, pg. 43) have shown that grassland restoration efforts have been more successful in resisting advances of non-native, invasive plants over chemical applications. When native forb seeds were included in the grassland seed mix, the native plants were shown to resist the establishment of Yellow S Star Thistle, for example.

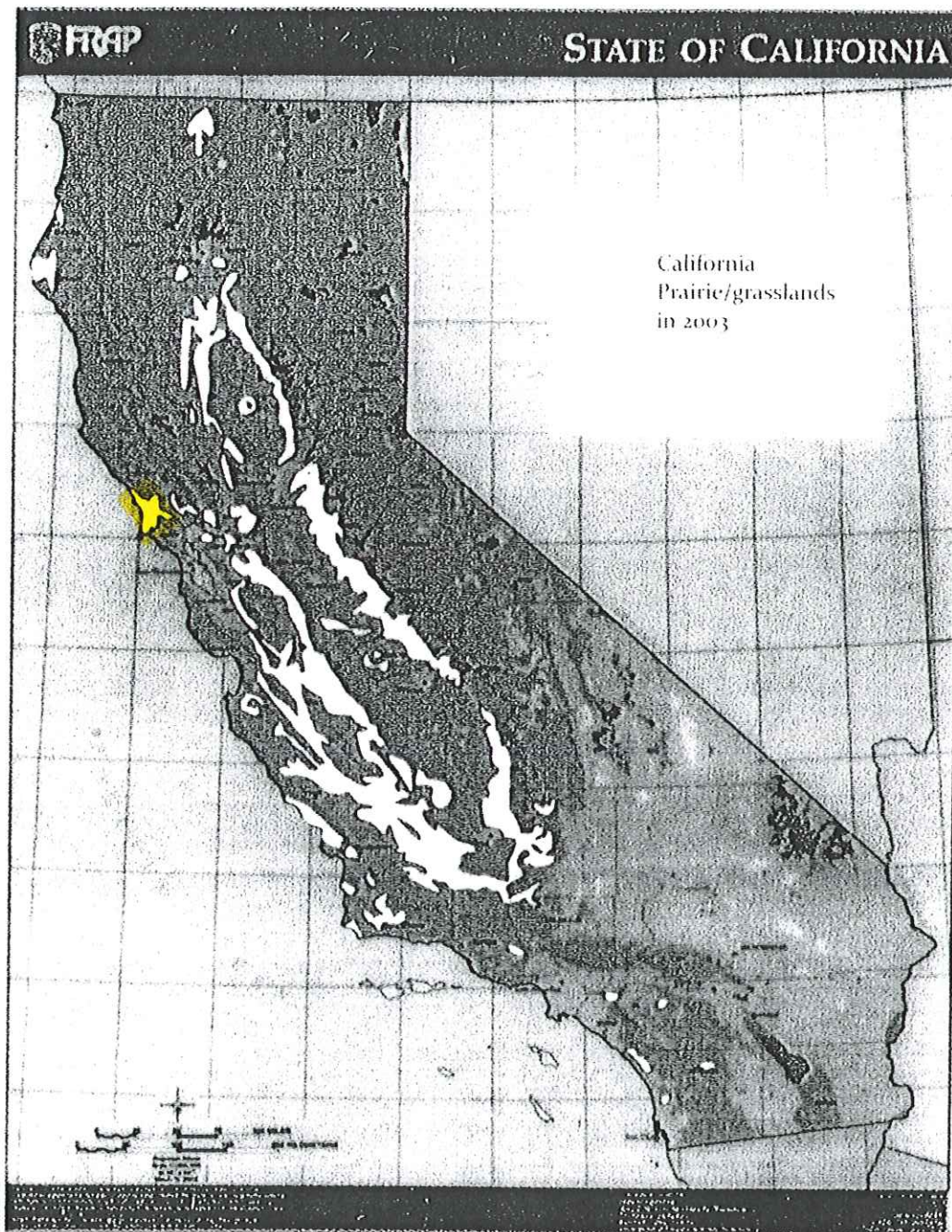
I also want to extend appreciation and thanks to staff for the Proposed Edit on pg.3, BOS Exhibit #1, Staff recommendations, clarifying the term "Utility facilities, by separating Wind Energy Conversion Systems and wind testing facilities through out the LCPA document.

Respectfully submitted, -



Beverly Childs McIntosh, retired Environmental Planner

FIGURE 2. CALIFORNIA FIRE AND RESOURCE ASSESSMENT PROGRAM (FRAP) MAP OF STATE LAND COVER IN 2003.



Note: Herbaceous land cover is indicated in bright yellow. It is approximately equivalent to Burcham's California prairie. Graphics by Joan Kodani.



Plate 128. Wilson Grove Formation sandstones near Valley Ford,
Sonoma County