

California Native Plant Society

Monterey Bay Chapter

3/22/2004
#60

P. O. Box 381
Carmel Valley, CA 93924
Mar. 20, 2004

Monterey County Planning Dept.
ATTN: Mr. Thomas McCue
2620 First Street
Marina, CA 93933

Re: Pebble Beach Plan DEIR

Dear Mr. McCue:

The Monterey Bay Chapter of California Native Plant Society would like to make the following comments on the Pebble Beach Plan DEIR.

This chapter has been working to protect the sensitive plants and plant communities of Del Monte Forest since its formation in 1967, when one of our very first field trips was led by the late Dr. Ledyard Stebbins, a botanist of international stature. We commented extensively on the Del Monte Forest Local Coastal Plan (LCP) in the early 80s and on the various iterations of Pebble Beach Co.'s development plans in the more than 20 years since then.

We have a difficult problem dealing with this document, not only because of its size, complexity, and the daunting effort involved in working from a computer disk, but primarily because it is prepared utilizing an outdated plan using an amendment (Measure A) that has never been submitted to the Coastal Commission for approval. While the new plan may be less destructive of habitat than the old plan, it still has severe impacts that we find have not been adequately analyzed and mitigated. A standard practice of Pebble Beach Co. over the years has been to point out that the then-current plan was superior to the previous one, and therefore should be measured against it rather than existing conditions. It is important to clarify that no previous plan has ever been approved, and all of them presented serious problems because of habitat loss. Because the LCP is significantly out of date, it contains maximum development numbers that are unrealizable because of current constraints, not just from the biological standpoint, but also because of water, traffic, and other issues.

Our comments will deal specifically with the following issues: 1) direct impacts to special status plant species and communities; 2) impacts of tree removal, particularly the Monterey pine forest; 3) impacts to sensitive dune habitat areas and proposed restoration; 4) compliance with requirements to protect Environmentally Sensitive Habitat Areas (ESHA); 5) Concerns about the Resource Management Plan (RMP) and TEAM Plan; 6) Alternatives.

1) Direct impacts to special status plant species and communities:

Del Monte Forest has long been recognized by scientists as a botanical "hotspot," supporting some 19 sensitive plant species and several sensitive communities. The following species found in the project area were listed under the Federal Endangered Species Act in 1992 as endangered: Menzies wallflower (*Erysimum menziesii* ssp. *menziesii*), sand gilia (*Gilia tenuiflora* ssp. *arenaria*), beach layia (*Layia carnosa*), and Tidestrom's lupine (*Lupinus tidestromii*). Monterey spineflower (*Chorizanthe pungens* var. *pungens*) was listed as threatened in 1994. Yadon's piperia (*Piperia yadonii*) and Monterey clover (*Trifolium trichocalyx*) were listed as endangered in 1998. A number of species are listed by the California Endangered Species Act (CESA), including the aforementioned Menzies wallflower, sand gilia, beach layia, Monterey clover, and Tidestrom's lupine; and Hickman's cinquefoil (*Potentilla hickmanii*). In addition, Pacific Grove clover (*Trifolium polyodon*) is listed as rare under the Native



Dedicated to the preservation of California native flora



Plant Protection Act. Incidental take of any of these species must be authorized by the State or Federal trustee agency. Large-scale transplantation is the mitigation proposed in the RMP, but reputable scientists including those at DFG do not recognize this practice as a desirable mitigation strategy. This is especially true after the experience with Spanish Bay, where wholesale transplanting of some of these species without proper permits or documentation resulted in extremely high losses of the plants.

There are a number of additional plants that meet the definition under CEQA for plants which must be analyzed and any losses mitigated. These include Hooker's manzanita (*Arctostaphylos hookeri*), sandmat manzanita (*A. pumila*), and Eastwood's golden-fleece (*Ericameria fasciculata*).

Yadon's piperia's specific biology and its uneven distribution indicate that very specific environmental factors sustain its growth in specific areas and no study has identified how to determine if these conditions will be present on the TEAM report's suggested 293 acres available. For example in Area B, 20 acres are identified, but many of the 20 acres are extensively covered with low herbaceous plants presently with little promise for piperia habitat. Transplanting into areas with piperia present will not mitigate loss of other habitat and populations, as existing populations are already providing seeds for expansion of their population.

The DEIR recognizes the importance of the MNOUV occurrence of Yadon's piperia and that the impacts on that population would have a significant effect. The DEIR properly notes the importance of preservation of large contiguous habitat areas and of adjacent unoccupied habitat to allow for expansion in response to changing habitat conditions. The DEIR stresses the need for further avoidance measures, as well as preservation of areas proposed by the applicant, and preservation of additional areas proposed by the County. However, to mitigate the MNOUV impacts, the DEIR relies on the TEAM plan to transplant Yadon's piperia.

Because there is very little existing evidence of the successful transplantation of this orchid, we do not find that the TEAM plan can be relied upon to mitigate impacts to the species. Transplantation of Yadon's piperia is likely to be expensive, labor intensive, and ultimately unsuccessful.

Avoidance and minimizing impacts are the preferred means of reducing the loss of sensitive plants. We urge that the mitigation (BIO-D1-1) requiring redesign of the golf course to protect Yadon's piperia be applied to the other plants listed above. We strongly urge consideration of an alternative that maximizes avoidance by designing a nine-hole course adjoining Spyglass as described below. As the excess population of deer in Del Monte Forest results in heavy predation of the piperia, enhancement actions could include protection of existing plant occurrences that are known to be heavily browsed.

In addition, greater care in road maintenance and fire prevention and destructive mowing of piperia and other sensitive species that happen to grow alongside roads.

We deplore the omission of Maritime Chaparral from the list of sensitive habitats. While the dominant species in this habitat type do occur as understory in some areas of the Monterey pine forest, it also forms a separate shrubby community that is becoming increasingly rare in Del Monte Forest. We ask that it be mapped and the impacts of development analyzed so that appropriate mitigations can be incorporated in this plan.

2) impacts of tree removal, particularly on the Monterey pine forest:

We are very concerned about the impacts of the proposed plan on the Monterey pine forest and the unique habitat it supports. We find it unacceptable that a DEIR by Jones & Stokes would ignore or discount the significance of the earlier study by Jones & Stokes (J & S) describing the "ecological staircase" of six marine terraces created over geologic time in Del Monte Forest. These geomorphic formations were described in general terms by the late Dr. James Griffin, a former director of UC's Hastings Reservation and a foremost expert on California trees, in *Forest Heritage, A Natural History of Del Monte Forest*, published in 1972 by CNPS and republished by the Del Monte Forest Founda-

tion in 1980. However, it was not until the J & S study (1994-96) that soil samples confirmed the existence of a series of terraces differing in substrate and vegetation.

8 (cont.)

One of the top priority areas for preservation should be the forest on the middle-aged dunes of Terrace 3, across from Spanish Bay (Areas B and C). According to J & S, only 12% of this terrace remains, and only 8% is preserved. Unfortunately the development on Area B is sited on the most sensitive portion of the parcel, an area of oak and Monterey pine with a particularly undisturbed herbaceous understory. If the employee housing were moved to a nearby area degraded by the ditch dug for the conveyor belt for Spanish Bay, the impacts on the native forest would be greatly reduced. Better still would be to move it to the upper quarry near the company offices.

9

Proposed for Area C is a golf driving range and golf academy that will have a devastating effect on this rare forest. In order to protect this important habitat, we urge that the driving range and golf academy be sited in the lower quarry. This alternative would be feasible if a nine-hole addition to Spyglass Golf Course (instead of the 18-hole course) were designed, leaving space for the stables to remain where they are. This alternative would enable Spyglass to be operated more efficiently than it is currently. In addition, it would greatly reduce the impacts on sensitive species. At least one noted golf course designer has looked at that idea and found it eminently feasible. It was put forth as a compromise proposal several years ago by a coalition of forest residents and local organizations.

10

The above alternative would eliminate one of the worst features of the plan: the proposal to build a new equestrian center in the Huckleberry Hill Natural Area (HHNA) and adjoining the SFB Morse Preserve. The center raises a number of red flags that have not been resolved by the proposed mitigations. Two conservation easements that were mitigations for habitat loss from the Spanish Bay development cannot simply be discarded because they do not fit the present plan. However, we believe that utilizing the open space for a driving range could be acceptable use of the easement because it would require minimum alteration of the landform and would not have the impacts on the HHNA or the adjoining SFB Morse Reserve of an equestrian center. Greatly increased horse traffic would create greater ground disturbance along trails and roads, making it easier for invasive weeds to propagate, either because they are already present or because they are carried in on the horses' hooves. The new long-term significant loading of manure along trails will introduce weeds and non-native grass seeds throughout the HHNA area. There really is no such thing as weed-free feed; if there were, it would be prohibitively expensive. The impacts of what passes for weed-free feed only show up after time, when the weeds have already become established. Manure fertilization and the long-term loading of manure will potentially alter the environmental conditions that are now nutrient limited in the pygmy forests. The mitigations for periodic cleaning of manure from trails by the equestrian center staff are neither practical nor likely to be successful.

11

3) impacts to sensitive dune habitat areas and proposed restoration

We are particularly concerned about golf course encroachment on the Environmentally Sensitive Habitat Area of sand dunes harboring a suite of endangered plants. This area deserves the highest level of protection. Mitigation Measure BIO-A1-2 proposes a restoration approach and performance criteria for the dune revegetation which seem far from able to restore a functioning dune habitat, and lack remedial actions to be implemented if any aspect of the plan should be unsuccessful. We do not agree that allowing 20% of non-native plants and 10% of invasive species in the restored area can be considered a successful restoration.

12

We appreciate that seeds for restoration are to be collected locally, but it is important to be aware that seeds of uncertain provenance were used in the Spanish Bay restoration. For example, seeds of the silver beach lupine (*Lupinus chamissonis*), not native to this specific area, have produced plants that have hybridized with Tidestrom's lupine. Therefore, unless great care is taken to collect pure Tidestrom's lupine seeds, continued contamination of the stock of this extremely endangered plant could result ultimately in loss of the var. *Tidestromii*.

4) Compliance with requirements to protect Environmentally Sensitive Habitat Areas (ESHA)

We disagree with the very limited application of ESHA designation to sensitive habitats within Del Monte Forest. There is no "safe harbor" or "no surprises" provision in the Coastal Act or the Del

13

Monte Forest Local Coastal Plan that justifies refusal to accept any ESHA that is not designated in the original plan. That plan recognized that conditions were likely to change over time and provided for identifying additional ESHA as appropriate. Therefore the additional occurrences of sensitive plants have created new ESHAs that require adherence to Sec. 30240 of the Coastal Act.

13 (cont.)

While we believe that Monterey pine meets the ESHA standards, we recognize that the extent of the forest requires some compromises in allowing development to occur. However, the loss of some 15,000 trees is unacceptable. It means the loss of thousands of years of adaptations to environmental stresses to create a diverse gene pool that is a priceless biological asset. Of course the pine as a species is unlikely to become extinct except over geologic time; but the loss of this genetic "library" could well occur through overdevelopment and heavy-handed mismanagement.

14

5) Concerns about the Resource Management Plan (RMP) and TEAM Plan

Development, implementation, and monitoring through a Master Resource Management Plan (RMP) is required by Mitigation Measure BIO-B1-1. Also required are site-specific RMPs for all preservation and restoration areas. These plans are to be developed by a third party consultant. However, there is a description of the RMP framework that was prepared by the applicant, creating uncertainty about the independence of the third party consultant. Without being able to review the RMPs, it is very difficult if not impossible to estimate the potential for success of the various mitigation measures that have been proposed.

15

Because of our experience with Spanish Bay, where management plans changed periodically to reflect what actually happened rather than what was supposed to happen, we have become somewhat skeptical about such plans. At Spanish Bay Pebble Beach Co. spent an immense amount of money each year growing native plants, installing them on the "restoration areas" just before the annual monitoring event, and then many of the plants disappeared and the disturbed areas were colonized by weeds or turfgrass. The next year this process would be repeated, each monitoring report showing a good "regeneration" of native plants. As a result, Spanish Bay has never even approached the percentage of restored area that was required around the golf course, much less the larger percentage that was promised.

As stated before, we feel the TEAM plan places far too much emphasis on transplanting rather than more ecologically desirable and successful mitigations such as avoidance, minimizing impacts, set-asides, enhancement, etc. We could support small pilot projects to test whether or not the piperia would take in a given habitat, but it would require a matter of years to learn if it was continuing to survive and to reproduce successfully, the test of a successful operation. We cannot support mass transplantations, which, if put into a degraded area, would likely fail; or, if put in a good natural habitat, would have to displace other plants that are already established.

16


6) Alternatives

Our preference, of course, would be to eliminate the golf course because of its tremendous impacts on sensitive plants and habitats. This would carry out the intent of Pebble Beach Co. when it stated in 1984 that Spanish Bay would be its last golf course. However, we recognize that the golf course is a very high priority for the current owners, and we therefore urge that an alternative that would save most of the important habitat should be studied in the EIR. It would contain the following major items: a nine-hole course designed to be part of Spyglass and avoid the major habitat losses; a small boarding stables in the present location; driving range in the lower quarry; employee housing moved to a degraded site in Area B or the upper quarry.

17

Thank you for your consideration of these comments.

Sincerely yours,


Mary Ann Matthews
Conservation Chair