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#61

20 March 2004

Thom McCue
Monterey County Planning
2620 First Ave.
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RE: Pebble Beach DMF/PDP Draft Environmental Impact Report

I have the following comments regarding the DEIR analysis:

In general I find that the impacts on rare and sensitive habitat in terms of habitat loss are significant for the proposed project and can be reduced more effectively by reducing the number of acres destroyed or fragmented. an alternative that would retain the equestrian center at the present site, expand Spyglass Hill golf course by 9 holes, expand other golf facilities in that area, allow for an academy and driving range in the lower sawmill quarry site, preserve area C, reconfigure employee housing B, and minimize lot sizes in various subdivisions and preserve Monterey pine forest offsite for example in Aquajito site, would produce greater environmental benefits

And specifically:

- 1 **Mitigation Measure BIO-A1-2** dune habitat management - this proposal allows for the continued presence of non-native and even invasive non-native plants (up to 10%). Successful dune habitats can not have any invasive non-native plants as varying environmental conditions (rainfall extremes) or a decrease in management could lead to an explosion of the invasive non-native plant and displacement of the native dune vegetation that is being protected. Please justify how allowing invasive non-native plants to be present can maintain native dune habitats for the long term. 1
- 2 **Impact BIO-A5.** Equestrian usage of HHNA trails. Greatly increased horse usage of trails/fire roads will deposit substantial amounts of manure along trails throughout the HHNA. The current HHNA (especially the pygmy forest) is a very nutrient poor environment. Increased nutrient loading will affect not only streams but areas all along trails and will alter what plants can flourish along trails. Long term this could comprise the natural vegetational values of HHNA. Non-native grasses from the horse manure may flourish and spread into the surrounding HHNA due to increased fertilization. This impact is potentially long term significant. Mitigation HWQ-C3 only partially addresses manure fertilization. Further mitigation 2

should monitor whether manure along trails is fertilizing and supporting non-native plants and grasses and to require periodic cleanup in those areas that show increased non-native plants growing from manure.

The use of the blue trail by horses would entail substantial widening and vegetation cutting impacting native plants present.

3 Mitigation BIO-A5 HHNA protection from increased usage;

a) Due to narrow and fragile nature of vegetation along the blue trail, please consider a design to route horse traffic on a wider shoulder of Congress Road and analyze the impacts to accomplish that.

b) Weed control surveys - First does the term noxious weeds refer to the official state agricultural list that would be associated with weed free feed? Why are not all invasively acting weeds being monitored and controled? Any invasive weed must be controled and that means any weed that is acting invasively. Thus grasses and even plants like bermuda buttercup (oxalis) can spread aggressively. They cause damage by depleting moisture and can alter natural habitat completely for example ripgut grass in coastal dunes, Ehrharta erecta at Pt. Lobos. To protect the natural resource values for which the Morse preserve and HHNA were set aside for all invasively acting non-native plants must be monitored. Monitoring and eradication work from my experience needs to be done at least monthly when a problem weed area has been noted to be effective. What are success goals? Eradication or control? Given the sensitive biological resources of the Morse preserve then please justify anything less than eradication as it is uncertain after 20 years what kind of management will occur.

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4 General impacts of Equestrian center -

a) The new access road to and 34 space parking area at lower corner of upper sawmill impact significant monterey pine & manzanita forest and abut less than 100 feet from a wetland/riprarian area immediately to the northeast. Develop an alternate design to provide for proper setback. Why can't the existing dirt road corridor that closely parallels the proposes road be used instead and another horse trail be constructed on level below it?

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b) The hay barn is located less than 100 feet from the HHNA in an area exposed to the frequent strong coastal winds. I am concerned about how loose hay will be prevented from blowing into the HHNA and spreading grass and other weeds (weed free feed is not always 100% weed free) directly into the HHNA. How will this impact of blowing hay be prevented?

5

- c) Increased recreational conflicts between equestrian and other usage is a potential significant impact that needs to be addressed.

Currently the HHNA probably has the greatest non-coastal recreational usage than any other part of the trail system. From nature hikers, family hikers, dog walkers and mountain bike usage. Direct conflicts and negative impacts from horse manure (smell and stepping around) on non-equestrian users will be very frequent and substantial. I see signs of horse usage (manure) only several times a year so the increase from to over 9000 trips will be substantial impact.

Again proposed mitigation would be for periodic clean up of manure on trails and more develop more separate hiker and horse usage trails.

- d) For buildings immediately adjacent to recreational trails in preservation areas visual impacts and lighting will impact the recreational experience. Where it is infeasible to setback buildings further then impacts on views from trails can be mitigated by vegetational screening and requiring that outdoor lighting be properly screened to limit lighting to immediate vicinity of dwellings. Such conflicts could occur at both Employee housing sites and at the equestrian center where the upper managers and staff residences and the camp dorm buildings are quite visible from adjacent trails.

The potential impacts from increased equestrian use of the HHNA are very substantial. The area was established to protect the unique plants and any use that is potentially detrimental in the long term should not be allowed when an alternative of scaling back development slightly and not moving the equestrian center is viable.

5 Impact BIO-B1 impacts on sensitive habitats.

Another source of impact is the planting of non-native plants on residential lots that adjoin sensitive habitat such as pine forest. Also the disturbance of residential lots will allow for non-native plants to potentially flourish and spread into nearby habitat. *Mitigation BIO-B1-2* which limits building envelopes to 0.5 acres is a good step, but clearance and alteration of the remaining acreages continues the threat to the adjacent preservation areas. In the case of F-3 lot1 mitigation *BIO-A4* removes a buffer zone from the lot. Similarly the lot sizes elsewhere should be reduced to increase protected sensitive habitats and provide for a buffer zone to control the degradation effects at the edges of residential development. Smaller lot sizes would be consistent with LUP 32 preservation of sensitive resources and still allow for housing.

In particular:

Subdivision K should have residential lot restricted to the areas without Phipps and those areas placed in conservation easement.

Subdivision F-3 open space parcel to north east and more Hookers Manzanita protected by reducing lots sizes and shifting access road down the hill more.

Subdivision PQR - Lots 1,2,3,4 are all very close to the very sensitive Spruance Meadow. Lots 2 and 3 should be relocated elsewhere (I-2 or F-2) or at the minimum be designed to provide a 200 foot buffer to the meadow and some means to prevent usage of meadow by residents (and their dogs).

Subdivision PQR lots 5,6,7 again are very large for a 0.5 acre building envelope. Reduction in size would allow for greater buffer space to preservation area.

Subdivision I-2 - lots could be made smaller so that areas in I-2 that have highest biological values could be protected.

Subdivision F-2 lots could be made smaller so that areas of highest biological value can be preserved.

9 (cont.)

6 Mitigation BIO-B1 - RMP and resource management of preservation areas.

a) Long term mitigation for destruction of monterey pine forest habitat that relies on removing invasive non-natives from the preservation areas is only effective if its goal is to eradicate invasive weeds and not merely control them. Pebble Beach has been ineffective in many areas in weed eradication. Infrequent spraying temporarily controls a weed, but gorse, cape ivy and genista and many non-native grasses continue to exist with current management efforts.

b) *Gap phasing* has the potential to spread weeds and invasive weeds throughout the forest preservation areas and should be allowed only when they have demonstrated elsewhere that they can eradicate invasive weeds. Gap phasing and active management do not mitigate in the long term without an effective weed eradication plan as part of the RMP.

c) A weed management plan for RMP's must include:

a attention to all invasively acting weeds which includes non-native grasses.
If a non-native plant is spreading then it must be eradicated

b The goal and success are measured by eradication of a site of non-native weeds.

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- c routine followup visits to get resprouting plants before they grow enough to produce seed and to monitor for other weeds that are moving in as a result of the killing of the another weed.
- d Adequate weed crew staffing and monitoring by an informed biologist who can show in the field what is to be done.
- e Proper cleaning procedures of clothing, shoes and equipment before working and after working in a site to prevent spread of weed seeds into and out of an infested area.
- f Education of workers: - again education is best when shown at the site. Before any work is done a biologist should examine site and indicate how work can be done without damage. Last July 2003, several dozen flowering *Piperia yadonii* were buried along road 7 so an uneducated worker was not told that he was working in occupied *piperia* habitat.

10 (cont.)

d) *RMP reports and mitigation.* The DEIR describes a third party consultant to produce and provide annual reports on resource management plans, which is a good improvement on previous mitigation approvals. This process would be improved even more if a public hearing would be held to allow for public input into management of the preservation areas. In fact the public can offer very useful volunteer efforts in forest management. How will it be assured that adequate resources are provided and are guaranteed to fully monitor the health of the forest and mitigation areas? What will happen if resources provided by Pebble Beach are not adequate to fully support all of the needed mitigation and what will be done?

e) *Mitigation of loss of trees* and other sensitive plants by replanting does not make up for the loss of intact habitat. The project does not indicate that there is anywhere sufficient space to replant all that will be removed in areas where trees or sensitive plants are not already growing. And the long term health of all the fragmented habitat effectively reduces healthy habitat which is not mitigated for. Significant offsite preservation will be helpful to reduce the significance of the loss of well over 100 acres of habitat

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7 *Piperia Yadonii* Draft TEAM - The draft did not provide any answers as to how much actually suitable habitat was available as there is no way presently to know if the sustaining natural conditions are present at all where *piperia* do not presently grow. Due to widely distributed seeds, existing populations are likely to expand naturally and enhancement will only partially offset the loss of other occupied habitat.

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Reduction of habitat loss is the only way to reduce the impact to less than significant so any alternative or mitigation that can reduce the loss of habitat is needed.

8 Driving Range – Area C - This and associated parking and academy will destroy or fragment a fairly intact, highly valuable monterey pine/oak forest that contains a very diverse herbaceous understory.

Please develop an alternative at the lower sawmill site for a driving range and move the parking to underground at Spanish bay resort.

The driving range tees could be to the west of the wetland to give sufficient driving range length and the academy could be placed in upper quarry or lower quarry.

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9 Golf course - Please construct an alternative that will expand the SpyGlass by 9 holes, but leave the equestrian center in current location and expand the driving range there and potentially put in Golf academy there. This will maximize protection of the biological resources in MNOQUV.

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10 Employee housing Area B - The DEIR fails to address the inadequate buffer between the housing and a heavily used recreation trail from the Van Winkle open space. The setback appears on order of 60 feet and if anyone in the building has a dog there will be a lot of barking from the nearby dog walkers. Visually the impact on recreational users is substantial with a building and nearby parking in close view. Please address alternative arrangement that better clusters the buildings and moves FF-133 and parking further west and provide for visual buffering of housing from the recreational trail usage. The zoning is for up to 4 units/acre so certainly the housing could be clustered better to retain the intact contiguous pine forest and minimize impact on recreational uses.

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Employee housing and paved infrastructure is concentrated on the portion of the parcel that has the most intact forest and is contiguous with the preservation area. Development should be concentrated on disturbed central and western sections of the parcel.

Monterey County needs to re-evaluate the determination of Wetland B-B which is on the western part of the parcel. This was determined in 1997 as far as I know, during a period of exceptionally wet winters and anomalously elevated water tables. WRA July 2001 has no well data nor any determination data and the ranking table scored it 10 out of 49. Its plant communities rating was 0. I observed it in March of this year – a year of slightly above normal rainfall and find it well draining, well over 95% barren and having just a few plants such as upland indicators - genista, erichtites, poison oak, wood mint, annual grass (perhaps *Brizsa maxima*) and one small patch of *Juncus phaeocephalus* and one plant of *Juncus patens*, neither of which is overly associated with wetlands in Pebble beach. It is an artificial ditch from the conveyor belt (1986) and probably should have been filled in then. Hydric soil conditions were not considered sufficient to designate wetlands at the proposed golf course site and with similar lack of significant wetland indicator vegetation

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this should not be classified a wetland either. I have attached photos of the wetland taken on March 20, 2004.

On what basis does Monterey County consider this a wetland? I request that another evaluation be done as without seasonal wetland B-B the employee housing could easily be reconfigured so as to minimize the impact on the eastern forested portion and better buffer it from the recreational uses nearby. A slight relaxation of the setbacks from highways (while maintaining over 100 feet from 17 mile drive,) would allow for the current configuration to fit in easily into the more disturbed portion by shifting it westward – see attached page.

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If the equestrian center is not moved then employee housing could be placed in the upper sawmill site.

Thank you for your consideration,



Robert Hale

Seasonal Wetland B-B Robert Hale comments



Seasonal Wetland B-B

March 20, 2004

8 Employee Housing, Area B

Move Employee housing westward with 150, 75' by ~150 feet

Setbacks

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Example

disturbed

OPEN SPACE

OPEN SPACE

7 MILE DRIVE

CONGRESS ROAD

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