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8 November 2004

Thom McCue,  
Monterey County Planning Department

RE: PRDEIR for Pebble Beach Project

Hi I have the following comments regarding the partially recirculated  
Draft EIR for the Pebble Beach Project circulated in September 2004.

**1) For the analysis Chapter P-3 for the Green Trail segment from  
HHNA to Spanish Bay.**

**1) The impact on existing recreational (which is extremely non-equestrian) usage of the Green trail from a dramatically large increase in equestrian usage is not considered in the PRDEIR.** The HHNA and surrounding areas receive the bulk of all usage in Del Monte Forest, from recreational users such as hikers, people walking dogs and bicycle riders. I have never encountered a horse on trails there and seldom see manure. Relocation of the equestrian center will increase equestrian usage from a handful (my observation) per a year to an average of about 30 a day (PRDEIR estimate) with likely much higher usage on weekends.

**Impacts** of substantial new equestrian usage will include: conflicts with dog walkers (spooking of dogs and horses), physical conflicts with other users and bicyclists, a general conversion of trails to dusty hoof pounded nature, and horse manure deposited along trails. Usage by over 30 horses a day on weekends is likely to result in a lot of manure and smell along the trail. Equestrian usage is likely to discourage usage by other users or force other users off the trail onto "social trails".

I am against relocating the equestrian center for the reasons that this will greatly impact the only part of Del Monte forest that is readily accessible for most passive by recreational users

**Mitigations** for increased equestrian usage should involve an active removal of horse manure along trails (after all we have to clean up after our dogs!) and separate use trails for non-equestrian users.

P-21

## 2) For Yadon's piperia chapter P-2.

2-a) The PRDEIR again fails to recognize that occupied Yadon Piperia habitat is ESHA, Enviromentally Sensitive Habitat, as the the Del Monte Forest Plan recognizes federally listed plant species as ESHA. Why does the PRDEIR not consider occupied Yadon Piperia habitat ESHA?

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2-b) *New Equestrian Center Yadon's Piperia locations.* The DEIR and PRDEIR have omitted the occurence of yadons piperia in the New Equestrian Center. There is a population at the top of the lower quarry on the northeast corner where the woods starts to slope down into a riprarian area (see map enclosed). This population is located within or extreme proximity to the access road and parking lot identified as (34) on the map. The pine woods located where the parking area adjacent to proposed RING 1 would very likely be prime habitat for piperia that has probably not been adequately surveyed. Note :- I have completed plant surveys for the Mitteldorf Preserve and have extensive experience identifying our local flora, so I'm pretty sure this is Piperia yadonii at this location.

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2-c) Thus *Mitigation Measure BIO-D1-1* paragraph 2 should be that **ALL construction activities** at the New Equestrian Center shall avoid all identified Yadon's Piperia locations.

2-d) There is no evidence presented that the New equestrian area or HHNA in general have had any Piperia surveying done since 1996 and that was before the applicant proposed relocating the equestrian center there. The County can not approve plans for development there until adequate surveying has been accomplished. Thus **Tables P2-1 and P2-3** are in error regarding the Equestrian Center. Surveying in 2005 for Piperia needs to be done to better quantify Piperia numbers and potential habitat in the HHNA.

2-e) *Long term cumulative effects on Piperia - MNOUV area.* Given that all transplantation will occur in this area and that the overall area will have significant long term indirect effects from fragmentation and especially "golf course" deer browsing how is it possible to indicate that long term survivability of one of two major occurences of this species is possible? The PRDEIR indicates that plants do survive in golf courses, but there is no evidence about how many. Survvial of the two major populations in Pebble Beach is crucial to the long term health of Yadons Piperia. This impact is not reduced to less than significant.

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2-f) Protection of Piperia on Residential Lots (K,PQR,F). Could the PRDEIR clarify how these will be protected? In case of *BIO-D1-1* it indicates a negative easement will be dedicated to the Del Monte Forest Foundation and then *BIO-D1-3* indicates that the applicant will own many acres of the

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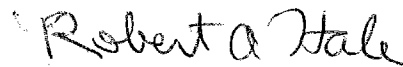
residential lots and protect the piperia. Who will actually own these portions of the originally proposed residential lots? Has the Projects application been changed to reflect this to show a reduction in the size of the residential parcels? If Pebble Beach retains ownership and manages the lands to ensure removal of invasive plants, etc then these mitigations are adequate. However if the occupied piperia habitat is still part of the residential parcel and owned by a third party - then protection of will not be certain and the mitigation inadequate.

5 (cont.)

2-g) The fact that Pebble Beach Company has buried flowering piperia (summer 2003) and continued degradation of populations along fire road 7 near 4 intersection is very disturbing and indicates a lack of knowledge or concern on their part. Monitoring and mitigation can not be solely left to Pebble Beach. The County needs to ensure an unbiased third party oversees all aspects of the Yadon piperia monitoring, transplanting and mitigation program.

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thank you for your consideration,



Robert Hale

