

DEPARTMENT OF FISH AND GAME

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November 10, 2004

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Mr. Thomas McCue
County of Monterey
Planning and Building Inspection Department
2620 1st Avenue
Marina, CA 93933
Fax: (831) 384-3261

Dear Mr. McCue:

Pebble Beach Company
Del Monte Forest Preservation and Development Plan
Partial Revision of the Draft Environmental Impact Report
SCH #2002021130

Department of Fish and Game (Department) personnel have reviewed the Partial Revision of the Draft Environmental Impact Report (PRDEIR) for the Pebble Beach Company's Del Monte Forest Preservation and Development Plan, and offer the following comments. The document provides additional focused analysis of the potential impacts of the project on supply and demand particularly with respect to the Carmel River and Yadon's piperia. Our comments focus on these two areas as they relate to the Department's previous comments on the original Draft Environmental Impact Report (DEIR).

The proposed project has not changed in any substantive way from the original project described in the DEIR; it includes development of a new 18-hole golf course with clubhouse and visitor serving suites; relocation of the existing equestrian center; construction of 91 visitor-serving units, additional meeting space, a new underground parking lot and new driving range/golf teaching facility at Spanish Bay; construction of 63 visitor-serving units, additional meeting and hospitality space and parking at the Lodge at Pebble Beach; creation of 33 residential lots; construction of 12 employee-housing units near Spanish Bay and 48 at the Pebble Beach Company's Corporation Yard; road, infrastructure and trail improvements; preservation and conservation of 500 acres of open space; management, enhancement and restoration of the various conserved areas; and a proposal to amend prior permits/conservation easements issued to the applicant.

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It is the Department's understanding that in finalizing the EIR for the project, the County will respond to previous comments on the DEIR not discussed in the PRDEIR and subsequent comments on the PRDEIR topics which have been further analyzed based on comments on the original DEIR.

Yadon's Piperia

In its comments on the DEIR, the Department was particularly concerned that impacts to Yadon's piperia, an endemic, dry-land orchid, be further avoided and minimized. The PRDEIR has identified additional avoidance measures to reduce direct impacts to the species; these measures include: BIO-D1-1 Avoidance, avoid removal of Yadon's piperia within all residential subdivisions, and BIO-D1-2 Minimization, Redesign of Stevenson Drive Realignment. These mitigation measures address the Department's previous concerns to what appears to be the maximum extent feasible. These measures have substantially eliminated most direct impacts in all development areas with the exception of MNOUV. The proposed Stevenson Drive Realignment and additional preservation in this area (Bristol Curve) further address direct project impacts in area MNOUV. Mitigation measure BIO-D1-3 Preservation, requires protection of additional areas for piperia increasing the amount of habitat preserved as part of the project. Implementation of the revised TEAM plan is intended to address those impacts remaining after avoidance, minimization and preservation actions and should be implemented as described in the PRDEIR. The TEAM plan has been revised in response to the Department's DEIR comments to focus on piperia management and enhancement of existing and potentially suitable habitat. Translocation has been limited to areas of forest restoration in area MNOUV. This revision has been responsive to the Department's previous comments.

The DEIR and PRDEIR identify a significant effect of the proposed project on this species. The PRDEIR describes the importance of the MNOUV occurrence. The document stresses the importance of conservation of blocks of large contiguous habitat, and identifies the importance of both occupied and adjacent unoccupied habitat to provide for room for expansion, and to allow the species to respond to changing habitat conditions, such as a vegetation structure, over time. To

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address this issue, Mitigation Measure BIO-D1-3 requires preservation of areas proposed by the applicant, and preservation of additional areas: Bristol Curve, Areas F-1, J, K, Old Capitol Site and Auajito. While substantial loss of habitat in MNOUV remains, the additional preservation and management helps to mitigate this loss. The Department is concerned, however, that the amount of habitat proposed for preservation on the Old Capitol Site will be based on surveys to be conducted in 2005. Based on surveys conducted in 1996, 57 acres were identified as containing Yadon's piperia. The Department believes that this acreage should serve as the baseline for habitat preservation on that site since it potentially describes the extent of suitable habitat present. Since a prime component of the TEAM plan is enhancement of known populations to address unavoidable loss of habitat resulting from the project, if the 2005 survey were to show a decrease in piperia abundance and distribution on the site, it would appear that enhancement of previously occupied habitat would be warranted and preservation on the site should not be limited by a reduction of species occupation of the site. This is particularly true since Appendix I indicates that the habitat on the site has declined since 1996.

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While the TEAM plan has been generally modified to address our comments on the DEIR, it does not clearly identify remedial actions to be taken if success criteria are not met. Remediation measures should be identified which could be implemented if the Adaptive Management Team determines success criteria are not met. Remediation could include protection and/or management and enhancement of other Yadon's piperia populations not protected as part of the current mitigation measures identified in the PRDEIR.

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Water Supply Impacts to Biological Resources

Based on the PRDEIR, implementation and operation of the RWP Phase II Improvements prior to serving water to the project (as covered in mitigation measure PSU-D1) will allow the project's water demand from the Carmel River to remain at current levels in most years. In those years where demand exceeds current levels, mitigation measure PSU-D3 proposes two options to offset the net increase of the additional demand. The first, using tertiary treated water to supplement water in the lagoon to compensate for increased demand, would require

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additional environmental review not included in the DEIR or PRDEIR. As such, the feasibility of this option is not clear. If this is to be included as an option, an analysis of its potential effects should be included in the PRDEIR to the extent that those effects can be described. The second option, and in the Department's opinion the preferable one due to ease of implementation, is an increase in the conservation of potable water by the project. The methods suggested in the DEIR should be incorporated into the project design as standard requirements.

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To ensure that RWP Phase II provides sufficient water to avoid additional impacts to the Carmel River, it is essential that the project shift all irrigation water use to treated wastewater rather than attempting to supplement it with potable water. Mitigation measure PSU-D2 must be clear on this issue rather than rely on restrictions in the MPWMD Ordinance No. 109 as suggested in the PRDEIR.

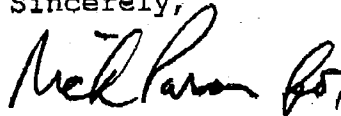
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The Department maintains its concern that even the current demand results in over-pumping that is causing adverse impacts to the aquatic resources within the Carmel River system. However, the Department recognizes that with full implementation of the mitigations proposed, the project itself does not contribute directly to increased demands, and commends the project for making modifications to its original document.

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The Department appreciates the opportunity to comment on the PRDEIR for the Pebble Beach Company's Del Monte Forest Preservation and Development Plan. We remain available to work with the County and the Pebble Beach Company to address issues related to protection of biological resources. Questions concerning our comments should be directed to Mr. Carl Wilcox, Habitat Conservation Manager, at (707) 944-5525 or by email at cwilcox@dfg.ca.gov.

Sincerely,



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cc: See Next Page

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