



# United States Department of the Interior

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IN REPLY REFER TO:  
286.295.1660

April 16, 2004

Thom McCue  
Senior Planner  
Monterey County Planning and Building Inspection Department  
2620 First Avenue  
Marina, California 93933

Subject: Draft Environmental Impact Report for the Pebble Beach Company's Del Monte Forest Preservation and Development Plan, Monterey County, California

Dear Mr. McCue:

We have reviewed the draft environmental impact report (DEIR) dated February 2004, which addresses the Pebble Beach Company's Del Monte Forest Preservation and Development Plan. The Pebble Beach Company's proposed project includes construction of a new 18-hole golf course; relocation of an existing equestrian center and associated facilities; construction of 91 visitor-serving units, parking, and a driving range for the Spanish Bay Resort; construction of 63 visitor-serving units at the Lodge at Pebble Beach; creation of 33 residential lots in Del Monte Forest; construction of 60 employee-housing units; road, infrastructure, and trail improvements; and the preservation and management of over 490 acres of natural lands within Del Monte Forest.

The proposed project may affect the following federally listed species or their habitat: the endangered Smith's blue butterfly (*Euphilotes enoptes smithi*), Menzie's wallflower (*Erysimum menziesii*), Monterey (sand) gilia (*Gilia tenuiflora* ssp. *arenaria*), beach layia (*Layia carnosa*), Tidestrom's lupine (*Lupinus tidestromii*), Hickman's potentilla (*Potentilla hickmanii*), and Yadon's piperia (*Piperia yadonii*), and the threatened California red-legged frog (*Rana aurora* ssp. *draytonii*), Monterey spineflower (*Chorizanthe pungens* var. *pungens*), and Gowen cypress (*Cupressus goveniana*).

We offer the following comments and recommendations to aid you in planning for the conservation of federally listed species likely to be affected by the proposed project and as a means to assist the applicant in complying with pertinent Federal statutes.

1. General. The proposed development in the DEIR is considerably reduced from the project which the Pebble Beach Company presented in 1996. We are particularly encouraged by

the current proposal and appreciate the applicant's efforts to protect the large stand of Monterey pine forest referred to as Area PQR and the proposal to leave Areas G, H, I-1, and L undeveloped. Preserving and appropriately managing these areas will benefit the listed plant species that occur there.

2. California red-legged frogs. Historically, California red-legged frogs were documented from the Monterey Peninsula at least as early as 1907 (California Academy of Sciences collections), although we were not aware of any recent sightings on the Monterey Peninsula until surveys in 2002 located California red-legged frogs along Seal Rock Creek ponds within the Spyglass Hill golf course and two frog sightings within the boundary of the proposed golf course. The DEIR indicates that California red-legged frogs may be killed or harmed by the proposed project during golf course and trail construction, through loss of foraging and dispersal habitat, increased runoff of pesticides and fertilizers, potential hydrologic and drainage changes in wetlands used for foraging and dispersal, and increased disturbance by pedestrian and equestrian traffic near riparian and other suitable habitat adjacent to development. The proposed project also includes actions that will benefit the population of California red-legged frogs on the Monterey Peninsula by creating additional breeding habitat along Seal Rock Creek and by permanently protecting and managing upland habitat, such as Area L. We believe the potential adverse effects to this species that would occur during the wetland restoration portion of the proposed project will be addressed under a section 7 consultation with the U.S. Army Corps of Engineers (Corps). If any incidental take of California red-legged frogs is likely to occur during golf course construction and maintenance which is not covered under section 7 consultation with the Corps, we would recommend the applicant develop a habitat conservation plan pursuant to section 10(a)(1)(B) of the Act, or work with us to ensure that the proposed best management practices, and additional ones if necessary, reduce the likelihood of take during those activities such that a habitat conservation plan would not be necessary.
3. Yadon's piperia.
  - a. It is our understanding that the survey data for Yadon's piperia in the Del Monte forest is approximately 8 years old and was mapped during a single year. In populations of Yadon's piperia there is typically some subset of plants that remains dormant in any given year, not emerging in leaf or flowering. Therefore, we recommend at least another year of monitoring to confirm the species location where populations are to be partially eliminated or fragmented by development and where redesign of lot boundaries or grading limits are proposed to avoid colonies and minimize project impacts. If possible, we recommend MNOUV, F-3, and other locations be resurveyed and mapped this spring while the species is in leaf to define the maximum extent of occupied habitat on these areas. If Zander Associates biologists mapped plants during 2001 plant counts, their results could

be compared with the 1995 data and surveys from this spring to improve the assessment of plant distribution, and thus potential impacts and preservation options in these areas. The final EIR should also explain how the occupied acreages were calculated and whether or not consistent criteria were used to draw the boundaries of occupied habitat.

- b. Chapter 4.4, Cumulative Impacts, in the final EIR should show the locations of the potential future projects it discusses (e.g. Area Y) or refer to a map page if they are already included in the DEIR.
- c. The boundaries of the PQR preservation area, which supports the largest known occurrence of Yadon's piperia, differ between Figure 2.0-2 and Figure E-22 (in Volume II). On March 17, 2004, the applicant clarified to us that Figure 2.02 shows a greater area protected than what is proposed because the figure inadvertently includes Area Y in the open space preservation area. Please clarify the boundaries and acreage of the PQR preservation area in future documents.
- d. The impact analysis provides a quantitative assessment of Yadon's piperia habitat which would be directly removed and that which would be preserved. We recommend that you also provide an assessment of habitat fragmentation which would occur as a result of project implementation. This assessment should recognize the value of adjacent, currently undeveloped Monterey pine forest that may provide space into which Yadon's piperia populations could expand or shift in response to environmental changes (e.g., canopy gaps or increasing shrub cover).
- e. The protection of Area PQR is of critical importance to the recovery of Yadon's piperia due to the size of the Yadon's piperia population there, the relatively unfragmented condition of the site, and the size of the site's Monterey pine forest stand. We commend its inclusion in the proposed project as a preservation area and recommend the proposed lots within its boundaries be relocated to areas where they would not directly or indirectly affect Yadon's piperia.
- f. We concur that inclusion of the additional preservation areas in mitigation measures BIO-D1-1 and BIO-D1-2 is important. In particular, protection of larger areas and those contiguous with existing populations or protected areas and having high densities of Yadon's piperia have a better chance of persisting in the long-term. We recommend that you include a map of the preservation areas described in BIO-D1-1 and BIO-D1-2 and describe the habitat values of these additional preservation areas.
- g. The DEIR concludes that significant adverse effects that would result from the proposed golf course are offset by all mitigation measures, but specifically relies on

mitigation measure BIO-D1-3, the development and implementation of the Transplantation Design, Enhancement, and Adaptive Management Plan (TEAM plan). We value the experimental and scientifically rigorous approach described in the TEAM plan and the information it could provide to improve management of Yadon's piperia. However, at this stage in its development it is still experimental. We are not aware of any information that indicates translocation of Yadon's piperia tubers will result in establishment of new self-sustaining populations and/or colonies, and translocation of tubers has failed in at least one location elsewhere (Sky Park Self Storage at the Monterey Peninsula Airport). We recommend the future focus of the TEAM plan be on population enhancement and that salvaged tubers or seeds be used to implement a program of experimentation and research on *in situ* seedling establishment, reproduction, deer herbivory, and habitat requirements, to better direct management of the species. If there is the potential for translocated tubers to harm existing populations (e.g. through introduction of pathogens, genetic exchange), we recommend they not be placed near existing populations and not be introduced to Area PQR. We would like to comment further on the TEAM plan and its proposed success criteria as its role in the mitigation for the proposed project is clarified.

- h. In conclusion, we commend the proposal to set aside and manage areas of Monterey pine forest such as PQR, G, H, I-1, L, F-1, and the Old Capitol site, as described in the DEIR. These will be important to the recovery of Yadon's piperia. We also support a scientifically rigorous approach to addressing information gaps, as is evident in the TEAM plan outline. At the same time, the Del Monte Forest accounts for over half of the range-wide numbers of Yadon's piperia and the occurrence at Area MNOUV, site of the proposed golf course, is the second largest in existence. Therefore, due to the experimental nature of mitigation measures involving Yadon's piperia population enhancement and translocation, we recommend that success criteria be established as a condition for project approval. In the event that the mitigation measures are unable to meet these criteria, appropriate contingencies should be included, such as preservation of additional lands.

4. Monterey clover. According to Volume II of the DEIR, the proposed project will not adversely affect Monterey clover. The proposal to designate all of Area G (on which Monterey clover was most recently seen) as a preservation area will benefit the species and improve its chances of recovery. We agree with the recommendation on page E-20 and E-21 that active management of this species, particularly actions designed to promote regeneration and population persistence, should be included in Area G's resource management plan (RMP) and implemented.

5. Gowen cypress. Impact BIO-D2 suggests that up to 20 Gowen cypress trees could be impacted by the proposed project. Later in the DEIR, Impact BIO-I1 indicates that 536 Gowen cypress trees previously planted at the Sawmill site will be removed. The DEIR should address whether these were planted as mitigation for previous direct or indirect impacts to Gowen cypress and, if so, should specify mitigation for the recurring proposed loss of this species.
6. Mitigation Measure BIO-B1-1 and BIO-B1-6. We support the requirement for site-specific resource management plans (RMPs) for all areas that will be preserved and recommend the applicant consider developing a scientific advisory committee or group of experts in forest ecology and conservation biology to review the plans and provide guidance on maintaining biodiversity in the forest, including genetic diversity, and addressing the conservation challenges facing the suite of rare plant and animal species that occur there. We do not have comments on the general provisions of the RMPs identified in mitigation measure BIO-B1-1 at this time, except to note that some basic level of monitoring to assess the adequacy of management actions and potential threats (e.g., invasions by nonnative species and unauthorized trail construction) should be an ongoing action implemented and funded in perpetuity and not limited to specific success criteria as identified in BIO-B1-1. We concur that a guarantee of full funding and implementation of all RMP management and monitoring actions, as identified in mitigation measure BIO-B1-6, is important in assessing the likelihood that the proposed mitigation will be successfully implemented. We note that the currently proposed project would require altering the existing easement for the Sawmill site to allow development in this area previously designated for restoration and protection during approvals for an earlier project. We recommend any new conservation easements be structured to prohibit a similar change from protection to development.
7. Impact BIO-A5, as it relates to relocation of the equestrian center. The Huckleberry Hill Natural Area supports occurrences of Gowen cypress, Monterey clover, and Yadon's piperia. We recommend you reduce the potential for the equestrian center to impact these listed species. If an equestrian center is approved at the Sawmill site then in mitigation measure BIO-A5 we recommend you add a system of increasingly protective management actions that would be triggered if impacts to special status species or sensitive communities were to occur due to trail use. These actions could range from additional signage and protective fencing, to increased erosion control measures, to eventual permanent closure of a trail.
8. Smith's blue butterfly. Smith's blue butterflies were not found at the proposed project site during surveys in 2000, nor do we know of any documented occurrences from the Monterey Peninsula, although the food plant of Smith's blue butterfly does occur along the coastline at Pebble Beach (Arnold 2000). Because 5 or more years will likely have elapsed between the survey date and proposed project construction, and because the food

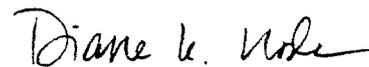
plant of Smith's blue butterfly occurs in unsurveyed areas elsewhere along the Monterey Peninsula coastline, we concur that additional pre-construction surveys identified in Mitigation Measure BIO-D6 would be prudent to confirm the presence or absence of this species. Even if Smith's blue butterfly does not currently occupy the seacliff buckwheat (*Eriogonum parvifolium*) located in the proposed project area, we concur with the DEIR recommendation in Impact BIO-D6 that restoration of dune habitat in the project vicinity should include revegetation with seacliff buckwheat to promote a diverse dune community that would be suitable for colonization by Smith's blue butterfly in the future should its distribution expand.

9. Listed dune plants. The DEIR identifies that the proposed project could result in disturbance to coastal dune habitat along the golf course access trail, during golf course construction, and indirectly during use of the golf course. We recommend the final EIR better describe the size and condition of the occurrences of federally listed plant species adjacent to the proposed golf course and how impacts to these species will be avoided and minimized.

We appreciate the opportunity to comment on the DEIR and are interested in working with you and the Pebble Beach Company further on this proposal for the Del Monte Forest. If you have any questions, please call Diane Steeck of my staff at (805) 644-1766.

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Sincerely,



Diane K. Noda  
Field Supervisor