

# California Native Plant Society

Monterey Bay Chapter, P.O. Box 221303, Carmel, CA 93922

October 10, 2018

VIA EMAIL TO: Mike X5176 Novo <novom@co.monterey.ca.us>; Wendy X5430 Strimling <strimlingw@co.monterey.ca.us>

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Mike Novo, Zoning Administrator  
168 W. Alisal Street  
Salinas, CA 93901

SUBJECT: Meeting October 11, 2018, Agenda Item ZA 18-065, PLN 160131, PG&E Powerline Maintenance

Dear Mr. Novo:

It has come to the attention of the Monterey Bay Chapter of the California Native Plant Society that a Mitigated Negative Declaration has been prepared for a grading and vegetation removal project proposed in an area of Environmentally Sensitive Habitat in North Monterey County. The work proposed consists of grading on slopes in excess of 25% and the removal of special status plants for PG&E powerline maintenance on Assessor's Parcels 129-281-017, 129,281,007, 008 and 009.

The Monterey Bay Chapter of CNPS obtained the Initial Study and Staff Report for this project, however we were not able to review the 2016 Biological Report prepared by Arcadis U.S., Inc. As outlined in the Initial Study, the proposed mitigation to offset damage to Environmentally Sensitive Habitat Area, notably Central Maritime Chaparral and several special status plant species, seems inadequate for a project that involves substantial grading and vegetation removal in this rare natural community.

Sandy substrates in this region are notoriously erosive and mitigation must include soil stabilization measures that are monitored for an adequate amount of time. No proposed mitigation in the Initial Study addresses the issue of erosive soil stabilization.

The Initial Study includes a proposed mitigation for impacts to Biological Resources that mentions stockpiling topsoil and then replacing it and seeding with a "local native seed stock". What type of seed mix is recommended and how will germination and success criteria be maintained? Any sort of seed introduced into Central Maritime Chaparral ESHA must be carefully considered and sourced to maintain habitat integrity.

The Initial Study includes a proposed mitigation for impacts to Biological Resources that mentions salvaging 20 special status plants and replanting them. The success of transplanting shrubs found in rare Central Maritime Chaparral has not been documented. This mitigation measure is inappropriate and inadequate. Who will maintain the planting stock and what are the success criteria parameters? The 3 shrub species mentioned in the Initial Study include Parajo manzanita, Hooker's manzanita and Eastwood's goldenbush. These species are truly uncommon, and in particular, Eastwood's goldenbush (*Ericameria fasciculata*), is a CNPS Rank 1B.1 plant, indicating it is extremely rare and restricted in distribution. The ESHA habitat that supports these special status plant species should be avoided.

Please reconsider the proposed mitigations described in the Initial Study - they will not reduce Biological Impacts to Less Than Significant in the ESHA impacted by this project.

Sincerely,

*s/s Nicole Nedeff*

Nicole Nedeff  
President



Dedicated to the preservation of California native flora

