

# California Native Plant Society

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

December 14, 2018

Terry Ash, Senior Environmental Planner  
Dept. of General Services, Real Estate Division  
Project Management and Development Branch, Environmental Services  
947 Cass Street, Suite 5, Monterey, CA 93940  
[cccvcproject@ddaplanning.com](mailto:cccvcproject@ddaplanning.com)

Comments on Notice of Preparation of an Environmental Impact Report for the California Central Coast Veterans Cemetery Project

The Monterey Bay Chapter sent comments on July 16, 2014 regarding the Draft EA and IS/MND for the Phase 1 of the CCCVC project. We expressed concerns over the lack of an EIR for the entire CCCVC with projected severe impacts to contiguous oak woodlands of over 50 acres and up to 9000 trees and known occurrences of endangered Monterey Spine Flower. We also expressed concerns that limited biological surveys conducted during a severe drought did not adequately allow for assessment of the extent of sensitive plant species.

Given that Phase 1 has already been constructed, it seems odd to be conducting an EIR for the Master Plan for the entire CCCVC at this stage. We need to be assured that the EIR will actually cover the entire 79 acre parcel and consider the total impact from full build out of all phases of the CCCVC. The piecemeal approach of analyzing by phases, as was done for Phase 1, should not be repeated at this time.

We request that the EIR must include a complete survey for all CNPS listed plants (rank 1,2,4) and federally or state listed plants that are known to occur in the project vicinity. The survey should be conducted at several times such as in April, June, and August to adequately capture different flowering times for various plants and over a couple of years to minimize weather impacts on the annual plants. The EIR should also survey the oak woodlands for tree numbers and size distribution and associated native plants in the understory and degree of invasive plants, i.e. the health of the woodlands.

We request that the EIR must fully document the observed impacts that Phase 1 produced such as how much oak acreage was removed and how many Monterey Spine flowers were found in predevelopment surveys. We also request that the EIR list the mitigations that were implemented for the Phase 1 impacts and whether they were successful. That way we can gauge the possible success of mitigation proposed in the pending EIR review.

We request that mitigation for special status plants should include 1:1 replacement acreage set aside elsewhere or at least establishment of new populations on site or in neighboring Fort Ord lands. We also request that any mitigation monitoring plan is long enough to ensure new plant populations are surviving over dry and wet periods, e.g. 7 to 10 years.



Dedicated to the preservation of California native flora



We request that oak woodland habitat be mitigated for on a 1:1 acreage by preservation of non-protected oak woodlands elsewhere in the project vicinity of equivalent biologic richness. Planting of oak trees in existing woodlands does not mitigate for the loss of the contiguous woodlands. Planting of oak trees on degraded lands has a very limited chance to successfully create oak woodlands as the woodlands are composed of an assemblage of native plant species and mycorrhizal hosts that would not be present.

We are concerned about the fragmentation of the oak woodland habitat and the potential and likely degradation from invasive plants that would occur. Impacts should especially focus on invasive grasses and other non-native plants that can greatly alter the understory and ecology of what is left of the oak forest.

We also would request that alternatives with a smaller footprint be considered so that some contiguous portions of oak woodlands would be preserved. Priority should be to preserve oak woodlands contiguous to preserved woodlands on adjoining lands.

Sincerely,

Donna Burych, Conservation Chair

