



CALIFORNIA
NATIVE PLANT SOCIETY

July 16, 2014

California Dept of General Services
RES-D-Environmental Services
P.O.BOX 989052 (MS 509)
West Sacramento, CA 95798-9052

Dear Valerie Namba

RE: Comments on Draft EA and IS/MND for California Central Coast Veterans
Cemetery Project – Phase 1

- 1) We request that an Environmental Impact Report be prepared for the entire Veterans Cemetery Project and that CALVET withdraw the Finding of Mitigated Negative Declaration for Phase 1 of the project. The entire project area encompasses an oak woodland with over 9000 trees. The final project cumulative impact on oak woodland and on the rare and sensitive species needs to be addressed before any approval of this project. The likely impact to the entire oak woodland is likely significant. Piecemeal consideration of a small subsection is highly irregular and violates the principle of EIR consideration of total impacts of projects BEFORE a project is approved. An EIR also allows for the consideration of alternative project locations that would not destroy as much oak woodland, such as presently degraded portions of former Fort Ord.
- 2) Mitigation BIO-1 considers rare and sensitive plant surveying.

Surveys conducted in May and July, 2014 were during a period of exceptional drought and are not likely to be representative, particularly for annual plants such as the endangered Monterey Spine Flower. We request further plant surveys during a wetter spring to fully understand the resources present prior to consultation and for an adequate determination of impacts on biological resources.

- 3) Impact of Fragmentation of Oak Woodland habitat is not addressed.

Oak woodland habitat is degraded by fragmentation as native understory and herbaceous ground cover are trampled or invaded by non-native invasive plants. The proposed project fragments the oak woodlands by spreading development throughout the woodland acreage. An EIR of the whole project would let us know the degree of

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fragmentation of the whole project and whether it could be configured to preserve viable oak woodland by clustering development. Some sort of oak woodland management plan is needed to address the significant impacts on oak woodlands

Sincerely,

Christopher Hauser
Chapter President