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Resources Management Agency – Planning
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Monterey County
Planning and Building
Inspection Administration

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February 2, 2009

Re: Comments on the Draft Environmental Impact Report for General Plan Update

Dear Mr. Holm:

Monterey County Biodiversity Significance

The Nature Conservancy (the Conservancy) has played a role in conserving the globally unique biological landscapes of Monterey County for more than 40 years. The Conservancy considers Monterey County a very high priority conservation region due to the area's high biological values on a local, regional and global scale.

Monterey is at the geographic core of the California Floristic Province, a globally-important hotspot of biological diversity (Myers 2003), and one of just five Mediterranean-type regions on the planet. Mediterranean ecological regions, defined by having cool, wet winters and warm, dry summers, cover just 2% of the earth's surface yet harbor over 20% of the species diversity. However, they are critically imperiled by habitat loss, fragmentation, climate change, and biological invasions and new diseases, such as Sudden Oak Death (Hoekstra et al. 2003). A mere 4% of Mediterranean Habitat is protected globally. It is the second least protected habitat type on Earth.

Even by California standards, Monterey County is phenomenally rich. Over 2000 species of plants, 37 of which are found nowhere else on Earth, at least 178 species of birds, and myriad other species call Monterey County home (Matthews 1997, Roberson and Tenney 1993).

The County contains core habitat for many declining and threatened species, and some of the best habitat remaining in the entire Central Coast ecoregion – a geographically diverse area stretching from Sonoma County to Santa Barbara County, from the Pacific Ocean to the western edge of the San Joaquin Valley.

Monterey County is also exceptional in comparison to other areas of the state and other Mediterranean regions in that its incredible natural resources are largely intact. The General Plan is Monterey County's most important tool for ensuring the sustainable use and appropriate protection of these resources.

A Conservancy-led biodiversity analysis in 2006 shows that Monterey County supports numerous sensitive ecological systems and associated species that do not currently have adequate levels of protection on either public or private lands. Many of these resources are largely restricted to rural rangeland areas and to steep slopes. Both rural residential development and large-scale agricultural conversion in these areas would further destroy biological systems and species that have already been highly diminished in distribution or that are not well represented within existing protected areas and parklands. Additional studies show regionally significant wildlife corridors that are likewise threatened by development and agricultural intensification (e.g. Missing Linkages Report 2001, Wilderness Coalition 2002).

TNC'S Long Term Goals

Our long-term goals in the County are to conserve areas of high biological importance and movement corridors linking these areas to other critical natural lands, including public conservation areas. Our strategies for achieving these goals are to work collaboratively with landowners, the community, and partners to: 1) acquire land and conservation easements from willing landowners in areas of high biological value, 2) keep large working rangeland landscapes intact, 3) promote land management, including ranching and agricultural practices, that are compatible with wildlife conservation, and 4) share scientific data and knowledge with community organizations and public agencies to help develop sound land-use policies that protect sensitive habitats, species and natural areas, while accommodating the needs of a growing population.

TNC's GPU Concerns

The Monterey County General Plan Update and its vision for future land use touches on many issues relevant to TNC's long-term goals in Monterey County. We limit our comments here to two issues of special concern – rangeland habitat conservation, and protection of wildlife corridors.

1. Conservation of Sensitive Habitats supported by Rangeland

The broad, relatively unfragmented matrix of grasslands, oak savanna and woodlands and riparian areas supported by rangelands in much of Monterey County includes high quality native vegetation and wildlife and associated sensitive species. The Conservancy recognizes that compatible agricultural and ranching land uses are important in sustaining many of these biodiversity. Therefore, we strongly support policies that sustain or improve agricultural viability of the region, while protecting sensitive habitats and associated species.

We are concerned that the DEIR does not adequately address cumulative impacts of proposed policies on key rangeland areas. We urge the County to ensure that provisions intended to support or expand vineyard or other cultivation take into consideration potential conflicts with natural resource conservation goals in high quality rangeland habitats, including but not limited to oak savannas and woodlands, riparian corridors, wildlife movement corridors, and aquatic habitats supporting rare and declining species such as steelhead trout. Exemptions from CEQA review of intensive agricultural uses in proximity to sensitive habitat areas could have significant, potentially irreversible impacts. An adequate analysis of the direct or cumulative impacts of such proposed policies does not appear to have been performed in the current DEIR.

We are also concerned that many of the DEIRs conclusions regarding the significance of biological impacts are unsupported because the development of substantive content pertaining to policies and mitigation measures has been deferred, or because these policies and mitigation measures do not appear to be reasonably enforceable or feasible. In many cases, the policies appear to indicate that future impacts would be assessed or mitigated on a project by project basis only.

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Finally, the DEIR's analysis of proposed policies relating to both non-agricultural development (e.g. rural residential development) and conversion of previously uncultivated lands to irrigated agriculture on foothill lands--both below and above 25% slopes--do not adequately address direct and cumulative impacts to biologically significant habitats, wildlife corridors and species.

2. Wildlife Movement Corridors

The Conservancy is concerned that the DEIR does not address impacts on regional and County-wide wildlife movement linkages that we believe will be highly impaired as a result of proposed policies. The County occupies a critical location relative to regional wildlife movements between major coastal and interior mountain ranges. Important movement corridors within Monterey County have been documented for the Central Coast region in at least two published studies (see Sources below). Additional knowledge is available from numerous local and regional conservation scientists, as we found in compiling our 2006 ecoregional assessment.

In addition, there is no analysis of potential direct or cumulative impacts of the proposed Agricultural Winery Corridors, which are located in areas identified in the sources cited below as critical for regional wildlife movement, including along Stage Road where the Salinas River runs adjacent to natural lands, and along River Road and Arroyo Seco Road, where equally sensitive wildlife movement corridors may exist. The direct overlap of the proposed Winery Corridors and identified regionally important wildlife movement corridors is raises serious environmental concerns and merits significantly improved analysis.

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Other policies which could affect the width or function of riparian corridors should also be analyzed for potential impacts to these important linkages.

Conservation of critical wildlife movement corridors should be called out as a specific goal of appropriate policies such as: "*CV-3.8: Development shall be sited to protect riparian vegetation, minimize erosion, and preserve the visual aspects of the Carmel River. In places where the riparian vegetation no longer exists, it should be planted to a width of 150 feet from the river bank, or the face of adjacent bluffs, whichever is less.*"

A Sustainable Future


The General Plan process represents the County's best opportunity to consider current and future land use and development wisely, at a landscape-scale, looking cumulatively at potential changes in land use, particularly in currently undeveloped areas. The long-term sustainability of much of the County's wealth of natural resources and biodiversity depends on a strong, well-considered General Plan – more work needs to be done to ensure that this critical standard is met.

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The Nature Conservancy urges the County of Monterey to ensure that these issues are addressed in the final Environmental Impact Report, and resolution of these issues be incorporated into the General Plan Update prior to its adoption by the Board of Supervisors.

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Thank you.



Christina Marie Fischer
Monterey Project Director
The Nature Conservancy
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Sources:

Penrod, K., R. Hunter and M. Merrifield. 2001. Missing Linkages: Restoring Connectivity to the California Landscape, Conference Proceedings. Co-sponsored by California Wilderness Coalition, The Nature Conservancy, U.S. Geological Survey, Center for Reproduction of Endangered Species and California State Parks.

California Wilderness Coalition July 2002. A Guide to Wildlands Conservation in the Central Coast Region of California. 144 pp.

Hoekstra, J. M., T. M. Boucher, T. H. Ricketts, and C. Roberts. 2005. Confronting a biome crisis: global disparities of habitat loss and protection. *Ecology Letters* 8:23-29.

Matthews, M. A. 1997. An Illustrated Field Key to the Flowering Plants of Monterey County. California Native Plant Society. 393 pp

Myers, N. 2003. Biodiversity hotspots revisited. *BioScience* 53: 916-917.

The Nature Conservancy 2006. California Central Coast Ecoregional Plan Update. San Francisco CA.

Roberson, D. and C. Tenney. 1993. Atlas of the Breeding Birds of Monterey County, California. Audubon Society. 438 pp.

Calderon, Vanessa A. x5186

From: Leslie Jordan [ljordan@TNC.ORG]
Sent: Monday, February 02, 2009 4:09 PM
To: ceqacomments
Cc: Leslie Jordan
Subject: RE: Comments on the Draft Environmental Impact Report for General Plan Update

Dear Mr. Holms,

We found some minor changes we'd like to make to the document we sent to you earlier today. Please review the attached document and ignore the previously sent letter.

I am also sending the revised letter by snail mail as well but it will arrive a day later than the original one.

Thank you for your time.

Sincerely,

Leslie Jordan

From: Leslie Jordan
Sent: Monday, February 02, 2009 2:21 PM
To: ceqacomments@co.monterey.ca.us
Cc: Leslie Jordan
Subject: Comments on the Draft Environmental Impact Report for General Plan Update

Dear Mr. Holm,

Christina Fischer from our Monterey office asked me to send you the attached letter. I have also sent the letter my snail mail. If you have any problems receiving this e-mail, please contact me at the e-mail below or call me.

Thanks much,

Leslie Jordan

Please consider the environment before printing this email

Leslie A. Jordan
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