

ZANDER ASSOCIATES

Environmental Consultants

July 9, 2013

Cheryl Burrell
Planning Manager
Pebble Beach Company
PO Box 1767
Pebble Beach, CA 93953

**Biological Resources
Area D Inclusionary Housing
Pebble Beach, CA**

Dear Cheryl:

At your request, I visited Del Monte Forest Land Use Plan (LUP) Area D on May 9, 2013, to confirm that conditions had not changed since my reconnaissance level biological resource assessment on December 14, 2011, and follow up seasonal surveys for special status plants on March 16, 2012 and April 25, 2012.¹ Prior to my May 9th visit, I obtained and reviewed the revised preliminary design plan for development of a 24 unit inclusionary housing project on the site, prepared by L&S Engineering and Surveying, Inc. dated February 26, 2013 (attached).

As I noted in my March 7, 2012 report (attached), Area D is a narrow remnant of Monterey pine forest habitat bisected by Congress Road and surrounded by older, established residential neighborhoods. Vegetation and wildlife resources in the area are limited because of land uses and development patterns that have resulted in habitat disturbance, fragmentation and lack of connectivity with other natural areas. No rare, threatened, endangered or otherwise special status species were found during seasonally appropriate surveys conducted in March and April 2012, and no special status species were seen during my recent May 9, 2012 site visit.

While site conditions have not changed significantly since my earlier visits, the plans for inclusionary housing on the site have been slightly modified since my March 7, 2012 report. The number of units has increased from 18 to 24 with a parallel increase in the number of parking spaces (from 40 to 53). Consequently, the total footprint of development has increased from about 2 acres to about 2.6 acres of the 6.2 acre portion of Area D east of Congress Road.

Development of the proposed inclusionary housing project would remove a sparse canopy of Monterey pine and pioneer coast live oak with a disturbed understory. About 124 Monterey pine trees over 12 inches at breast height (dbh) and 35 coast live oaks greater than 12 inches dbh would be removed (L&S Engineering May 28, 2013). The area south of the storm drain easement on the east side of Congress Road, which supports a more intact understory with the types of shrubby maritime chaparral species characteristic of Huckleberry Hill, would be

¹ Reports dated March 7, 2012, and September 13, 2012 describing the results of those site visits are attached for your reference.

preserved, along with the entire area on the west side of Congress Road. Sawmill Gulch, which cuts through the southerly section of the area south of the storm drain easement, would be preserved with a minimum 100 foot open space buffer.

Loss of 2.6 acres of fragmented Monterey pine/coast live oak forest surrounded by developed residential neighborhoods would not result in significant biological resource impacts. The several large blocks of sustainable Monterey pine forest habitat in the Del Monte Forest designated for long-term habitat protection and management by the Del Monte Forest Plan would more than compensate for this minor impact to forest habitat. If required, there are also potential areas for replacement plantings and habitat enhancement in Area D outside of the development envelope. The measures recommended in my March 7, 2012 report (except for seasonal surveys, which have already been completed) should further reduce potential effects on biological resources.

I trust that this updated assessment will assist you with your County of Monterey review and approval process. Please contact me by telephone (415-897-8781) or email (mzander@zanderassociates.com) if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Zander", with a long horizontal flourish extending to the right.

Michael Zander
Principal

Attachments: Biological Assessment, March 7, 2012
Seasonal Plant Surveys, September 13, 2012
Area D Preliminary Design, February 26, 2013

CB

ZANDER ASSOCIATES

Environmental Consultants

March 7, 2012

Mark Stilwell
Executive Vice President, Real Estate
Pebble Beach Company
PO Box 1767
Pebble Beach, CA 93953

**Preliminary Biological Assessment
Area D
Pebble Beach, CA**

Dear Mark:

At your request, I visited Del Monte Forest Land Use Plan (LUP) Area D on December 14, 2011, to conduct a reconnaissance level biological resource assessment and consider potential biological resource constraints to use of the area for inclusionary housing. Prior to my visit, I obtained and reviewed a conceptual plan for development of an 18 unit inclusionary housing project on the site, prepared by Fletcher + Hardoin Architects, dated December 1, 2011. Following is my assessment.

Location and General Characteristics

Area D comprises approximately 13.14 acres of relatively sparse Monterey pine forest straddling the east and west sides of Congress Road, just north of the lower Sawmill Quarry at Huckleberry Hill (Figure 1). Approximately 9.19 acres of Area D (Parcel F) are on the easterly side of the road with the remaining 3.95 acres (Parcel G) on the westerly side. Established residential areas of Pebble Beach and Pacific Grove surround Area D on the east, west and north. Sawmill Gulch cuts through the southerly third of the easterly Parcel F, crosses under Congress Road through a culvert, and flows northwesterly through about half of the 3.95-acre Parcel G on the west side of the road. An east-west trending storm drain easement (presumably a buried culvert) from residences at Pacific Grove to the east divides the easterly Parcel F. Approximately 6.2 acres of Parcel F are north of this easement and about 2.99 acres are south of it (see Figure 2 for details).

Biological Resource Overview

Area D is a narrow remnant of Monterey pine forest habitat bisected by Congress Road and surrounded by older, established residential neighborhoods. Consequently, the habitat values of the area have been compromised by fragmentation and human use as an easily accessible recreation area (e.g. jump courses for bicycles, excavations and structures for children's forts/encampments, heavy trail use—see attached photographs). Disturbed ground and an abundance of non-native grasses and other plants (e.g. English ivy, French broom) in the

understory, especially in the relatively flat area of Parcel F north of the storm drain easement, attest to long and frequent exposure to active human use of the area. In addition, the Monterey pine canopy in that area is particularly sparse, probably as a result of pitch canker mortality within the last decade or more and a lack of sufficient seed source trees for reestablishment. A considerable amount of downed wood and other debris remains on the ground as evidence of a once denser pine canopy. Coast live oak seedlings have become established in the gaps left by dead pines and could result in partial conversion of the area to oak woodland. South of the storm drain easement on Parcel F, the understory habitat is more intact and supports the types of shrubby maritime chaparral species that are characteristic of Huckleberry Hill such as huckleberry (*Vaccinium ovatum*), coffeeberry (*Rhamnus californica*) and shaggy-barked manzanita (*Arctostaphylos tomentosa* ssp. *tomentosa*). Also in this area of Parcel F south of the drainage easement, slopes increase and the main channel of Sawmill Gulch, a marginally perennial stream course, flows through the area from the southeast, more or less paralleling SFB Morse Road (Figure 2). The stream crosses Congress Road through a culvert and forms the dominant feature in the southerly half of Parcel G; riparian habitat is not well developed along this reach of Sawmill Gulch (see photographs).

Special Status Species

During the December reconnaissance, I checked for several perennial special status plant species that might reasonably be considered in Area D, and can be observed throughout the year, such as Hooker's manzanita (*Arctostaphylos hookeri*), Gowen cypress (*Callitropsis goveniana*) and Eastwood's ericameria (*Ericameria fasciculata*). I was also able to evaluate the habitat potential for special status wildlife. Although I did not observe any special status perennial shrubs or suitable habitat for most of the herbaceous species known to occur in the forest, the December reconnaissance was not adequate timing for a definitive assessment of special status in Area D. However, based on Zander Associates long experience in the Del Monte Forest and the habitat characteristics observed during the reconnaissance, I do not expect that a seasonally-timed search would result in any significant surprises relative to special-status plant species. Regarding special status wildlife, most target species can also be dismissed based on habitat characteristics, fragmentation, proximity to urban land use, and disturbance. Nesting raptors and migratory birds are probably the only wildlife constraints to potential development of the site (see below).

Proposed Inclusionary Housing Project

The conceptual inclusionary housing project would consist of 18 two and three bedroom residential units arranged in a semi-circle in the central portion of Parcel F in Area D on the east side of Congress Road (Figure 2). Parking (40 spaces), an office, and a common area would be located to the west of the residential units. The total area to be converted for this use would be approximately two acres (assuming the common area would need to be graded) of the 6.2 acre portion of Parcel F, north of the storm drain easement (Figure 2). The plan would result in the removal of Monterey pine and coast live oak trees and some woody and herbaceous understory species. There would be no encroachment within 100 feet of Sawmill Gulch on Parcel F and the entire west side Parcel G would be dedicated as open space

The presence or absence of special status species within the potential development footprint cannot be definitively determined based on my December 2011 reconnaissance of the site. However, as noted above, the likelihood of any special status species occurring within the affected area is very low.

Removal of two acres of already fragmented Monterey pine/coast live oak forest surrounded by developed residential neighborhoods would not result in significant biological resource impacts. The several large blocks of sustainable Monterey pine forest habitat in the Del Monte Forest designated for long-term habitat protection by the Del Monte Forest Plan would more than compensate for this minor loss. If required, there are also potential areas for replacement plantings and habitat enhancement in Area D outside of the development envelope.

While no raptor nests were observed in the trees on the site during my December field reconnaissance, there is potential that raptors and migratory birds could move into the area and establish nests prior to tree removal. Migratory birds are protected under the Migratory Bird Treaty Act (16 USC 703) and the California Fish and Game Code. The Migratory Bird Treaty Act prohibits the taking, hunting, killing, selling, purchasing, etc. of migratory birds, parts of migratory birds, and their eggs and nests. As used in the act, the term "take" is defined as meaning, "to pursue, hunt, capture, collect, kill or attempt to pursue, hunt, shoot, capture, collect or kill, unless the context otherwise requires." Section 3503.5 of the California Fish and Game Code also protects the nests and eggs of birds-of-prey and essentially overlaps with the Migratory Bird Treaty Act. Migratory birds could potentially establish nesting sites within the Monterey pine and coast live oak trees on the site and could be adversely affected if tree removal were to occur during the nesting season, typically from February 15 to August 1 on the Monterey Peninsula.

Conclusion and Recommendations

Area D is a 13.14-acre area divided into two separate parcels (F & G) by Congress Road and surrounded by residential neighborhoods just north of the Sawmill Quarry. A sparse canopy of Monterey pine and pioneer coast live oak with a disturbed understory characterize the site. Sawmill Gulch cuts through the southerly section of the area. Vegetation and wildlife resources in the area are limited because of land uses and development patterns that have resulted in habitat disturbance, fragmentation and lack of connectivity with other natural areas.

Monterey pine and coast live oak trees with a more or less disturbed understory occur within the potential development envelope and would likely be removed by the project. There is also a slight possibility that some special status plants (e.g. Yadon's piperia) could be found on the site. Seasonally-timed tree removal or pre-construction surveys and appropriate avoidance measures would ensure that nesting raptors and other migratory birds are protected.

The following measures are recommended to reduce potential effects on biological resources resulting from construction of an inclusionary housing project in Area D:

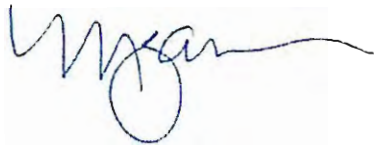
- Conduct appropriately timed seasonal surveys for special status plants to confirm their presence/absence. If any special status species are found, protect the plants that are outside

of the development envelope during construction activities by installing temporary fencing at the edge of the disturbance area. Require all construction activities and equipment staging to stay within the disturbance area. Inform construction crews about the sensitivity of the species occurrences in the remainder of the property.

- Landscape with native species to the extent possible, consistent with the natural habitats of the region, including intermixed local native source Monterey pine and coast live oaks with a native understory. Prohibit the planting of invasive species, such as French broom, pampas grass, iceplant, or acacia.
- Initiate tree removal and/or construction activities during the non-breeding season for migratory birds (typically from August 1 to January 31 on the Monterey Peninsula). If this timing is not feasible directed surveys for nesting birds should be conducted to reduce the potential for adverse effects. At least one survey should be conducted within 30 days of initiation of construction to determine presence/absence of active nests. If active nests are found and the biologist determines that construction activities would remove the nest or have the potential to cause abandonment, those activities should be postponed until the young of the year have fledged as determined through monitoring of the nest. Once the young have fledged, construction activities can resume in the vicinity. If construction activities are initiated outside of this typical breeding season, then pre-construction surveys for active nests should not be necessary.

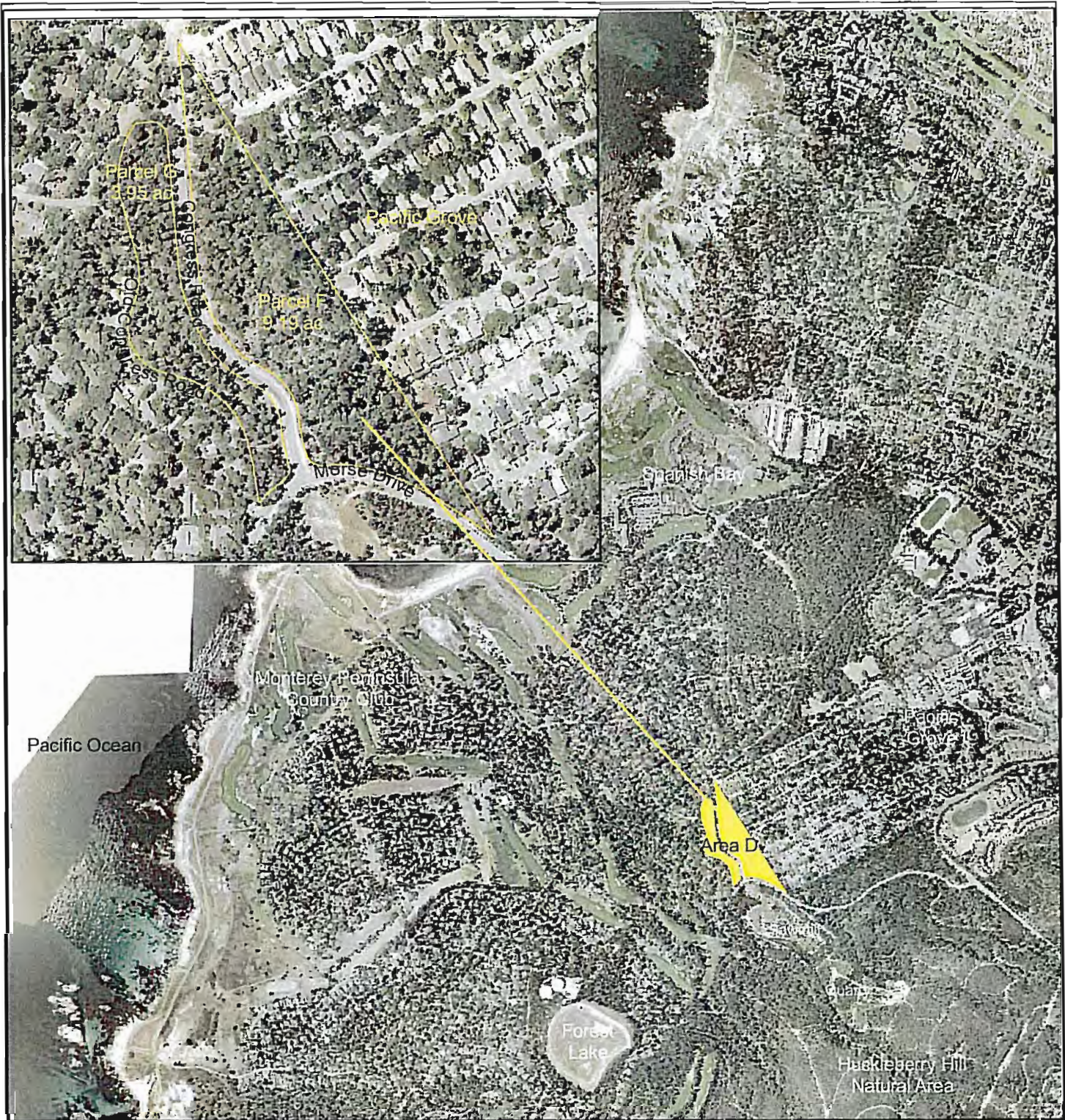
I trust that this assessment will assist you with your County of Monterey review and approval process. Please call me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Zander", with a large, stylized loop at the end.

Michael Zander
Principal

Attachments: Figure 1: Site Location
Figure 2: Area D Inclusionary Housing Concept
Photographs



1 Inch equals 1,833 feet



Legend

 Parcel Boundary

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 4460 Redwood Hwy, Suite 16-240
 San Rafael, CA 94903

Site Location
 Area D Inclusionary Housing
 Pebble Beach, California

Date: 2/12




Figure
 1



Scale: 1" = 120'

Zander Associates
 Environmental Consultants
 4460 Redwood Hwy, Suite 16-240
 San Rafael, CA 94903

LEGEND:

-  Site Plan
-  Area of Effect
-  Parcel Boundaries

Area D Inclusionary Housing
 Pebble Beach Company
 Pebble Beach, California
 2/12

Figure
 2

Area D – December 2011



Non-native grassland understory and sparse canopy in northerly portion of Area D



Cost live oak recruits in Area D understory

Area D – December 2011



Downed wood, sparse canopy and brushy understory in southerly portion of Area D



Downed wood and brushy understory in southerly portion of Area D

Area D – December 2011



Bicycle jump course in Area D



Encampment in Area D

Area D – December 2011



Well used trail in Area D



Reach of Sawmill Gulch in southerly part of Area D

September 13, 2012

Mark Stilwell
Executive Vice President, Real Estate
Pebble Beach Company
PO Box 1767
Pebble Beach, CA 93953

**Seasonal Plant Surveys
Area D Inclusionary Housing Site
Pebble Beach, CA**

Dear Mark:

Pursuant to the recommendations in my March 7, 2012 preliminary assessment of biological resources in Del Monte Forest Land Use Plan (LUP) Area D, I re-visited the area on March 16, and April 25, 2012, to conduct appropriately timed spring searches for special-status plants. During the March visit I focused primarily on Yadon's piperia (*P. yadonii*). The basal leaves of piperia are best observed at this time of year before grasses, low growing deciduous shrubs (e.g. poison oak), and other understory vegetation obscure their visibility. In late April, I was able to check for additional spring blooming special status plants with potential to occur in the area. Following is my assessment.

March Survey

On March 16, 2012, I systematically walked along east-west oriented meandering transects though the easterly, approximately 9.19 acre portion of Area D, paying particular attention to the area tentatively proposed for inclusionary housing (see March 7th report for detail). Some early spring herbaceous plants including Douglas iris (*Iris douglasiana*), sanicle (*Sanicula* sp.) and the non-native three cornered onion (*Allium triquetrum*) were beginning to bloom along with shrubs like shaggy-barked manzanita (*Arctostaphylos tomentosa* ssp. *tomentosa*) and the non-native French broom (*Genista monspessulana*), but it was still too early in the season for most spring blooming plants. The predominantly non-native grasses in the area were also beginning to grow and poison oak (*Toxicodendron diversilobum*) was just starting to leaf out. However, timing was ideal for a focused search for piperia. I also walked through the westerly (of Congress Road) portion of Area D, but did not survey that side as systematically as the easterly side since no development is proposed there.

I did not observe any Yadon's piperia or any other special-status plants that might be apparent at this time of year. I checked several reference sites in the Del Monte Forest where we have mapped piperia in the past and confirmed that the basal leaves were evident and easily observable at those known locations. I also visited the Spruance Meadow at Area PQR to check

seasonal progress of Hickman's onion (*Allium hickmanii*), another special status species with marginal potential to occur at Area D. Hickman's onion was not yet in bloom at Spruance Meadow, so a follow up survey was necessary to confirm its absence at Area D. A later spring survey was also necessary to confirm absence of other special status plants such as Pacific Grove clover (*Trifolium polyodon*) and pine rose (*Rosa pinetorum*).

April Survey

Before surveying Area D on April 25th, I checked known reference locations for Hickman's onion (Spruance Meadow) and Pacific Grove clover (Indian Village) to confirm that those species were in bloom at those locations (which they were). Consequently, the late April timing for the second spring survey of Area D was ideal. I repeated the east-west oriented meandering transects through the easterly portion of Area D, once again paying particular attention to the area tentatively proposed for inclusionary housing. I also walked through the westerly portion of Area D (across Congress Road) as before.

The diversity of herbaceous flora had changed very little since the earlier visit. As noted in my March 7th preliminary assessment, most of the understory north of the storm drain easement in Area D is dominated by an abundance of non-native grasses and other plants (e.g. English ivy, French broom). South of the easement, the area primarily supports shrubby chaparral species in the understory such as huckleberry (*Vaccinium ovatum*), coffeeberry (*Rhamnus californica*) and shaggy-barked manzanita (*Arctostaphylos tomentosa* ssp. *tomentosa*). I did not observe any Hickman's onion, Pacific Grove clover or pine rose in area D during my April visit, nor do I expect any of these or other special status plants to occur there.

I trust that this information will assist you in evaluating the potential for an inclusionary housing project at Area D. Please contact me by telephone at (415) 897-8781 or email (mzander@zanderassociates.com) if you have any questions.

Sincerely,



Michael Zander
Principal

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AREA D
DEL MONTE FOREST PLAN
AP 022-011-029
INCLUSIONARY HOUSING

DRAWN BY: J.L.
DESIGNED BY: J.L.
DATE: 2-28-13
SCALE: AS SHOWN
JOB NUMBER: 12-073
LAST REVISED: 12-073
REVISED BY:



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