

DERINDA L. MESSENGER & ASSOCIATES  
A PROFESSIONAL CORPORATION

DERINDA L. MESSENGER  
MIRIAM SCHAKAT  
JACQUELINE M. ZISCHKE

File No. 3668.000 A

March 7, 2008

Jacqueline Onciano  
Planning and Building Services Manager  
Monterey County Resource Management Agency  
168 West Alisal Street, 2<sup>nd</sup> Floor  
Salinas, CA 93901

**Re: Rancho Canada Village Specific Plan**

Dear Ms. Onciano:

I have reviewed the Draft Environmental Impact Report for the Rancho Canada Village Specific Plan and offer the following comments:

**Executive Summary**

Page ES-1, ES-3. The applicant name in the Draft EIR, Rancho Canada Community Partners LLC, should be corrected to Rancho Canada Partners, LLC.

Page ES-1. ES-1 refers only to portions of two parcels as comprising the specific plan area. This should be corrected to include all of the parcels detailed below in our comment to the Project Description at Page 2-1.

Figure ES-2. This figure should include the access road to the project site.

Figure ES-3. This figure should be corrected to accurately reflect the specific plan boundary, which abuts the church property. This same correction should be made to Figure 2-3.

Page ES-3. The project description should include the habitat preserve proposed for the site, and the restoration plan submitted to the County needs to be analyzed in the EIR. Also, please add language to the last sentence of the paragraph to read "possible extension of Rio Road as well as the possible construction of a tie back levee, and drainage improvements capable of handling local offsite drainage. The description of "condominiums/flats" should also include "apartments".

## Chapter 2, Project Description

This chapter should include a copy of the Rancho Canada Specific Plan Map. It should also be clarified that although there is a reference to "carriage units" in some of the pattern pages, this is in error. There are no carriage units as part of this project, and the total number of 281 units for Rancho Canada Village is correctly described in the Draft EIR. This error should be corrected.

Page 2-1. Please correct the parcel references. The specific plan boundaries include five parcels that are currently part of the golf course: APN Nos. 015-162-017-000, 015-162-025-000, 015-162-026-000, 015-162-039-000, and 015-162-040-000; a portion of the Hatton parcel: APN No. 015-162-037-000 a portion of Mr. Stemple's parcel, APN No. 015-162-016-000; and a second parcel owned by Mr. Stemple, APN No. 015-162-027.

Page 2-2. As stated above, the project description should describe and analyze the habitat preserve proposed for the site. The Draft EIR refers to the restoration plan for the Habitat Preserve at page 2-8, however, this restoration plan was not analyzed in the biological or other chapters of the Draft EIR.

Figures 2-2 and 2-3. See corrections explained above at ES-2 and ES-3.

Page 2-5. Housing, first paragraph. The Draft EIR's references to the Rancho Canada Village housing program should be clarified. The details of the Rancho Canada Village Affordable and Workforce Housing Plan are not finalized, and will be adopted as a separate agreement with the County. However, the project description correctly identifies that fifty percent (50%) of the homes (140 units) are proposed to be deed-restricted as affordable and workforce units.

Page 2-5. The Draft EIR states inclusionary units are to be developed either prior to or concurrent with the development of the market rate units. To the contrary, the market rate units will be developed initially, which provides for the necessary funding of the high number of affordable units provided by this project without government subsidies.

Page 2-5, last sentence. The sentence identifying that the marketing of affordable and workforce units would be limited to those working within the Carmel Unified School District boundaries is incorrect. As stated further up on page 2-5, the project seeks to develop a housing program that will assist qualified persons working in Carmel, Carmel Valley, and the Monterey Peninsula area.

Page 2-6, Table 2-1: The reference to Condominiums should read "Apartments/Condominiums".

Page 2-6, Circulation. The Draft EIR should clarify that there is a recorded 20' road easement located west of the project site, which can accommodate access onto Rio Road. The existing right of way is illustrated on Figure 2-5.

Page 2-9, Utilities, first paragraph. The water demand and net reduction in water use figures are not consistent with figures shown in Chapter 3.10. It appears Chapter 3.10 provides a conservative estimate of project water demand and total net reduction in water use. In the last sentence, the latter part of the sentence should read "newly formed community services district or other public or private water company".

Page 2-10, Drainage. The Draft EIR refers to an "unwritten" policy to maintain 100 year flow rates at pre-project 10-year flow rates, which the Draft EIR describes as "not practical" since the project site is located at the downstream end of the watershed. The Monterey County Water Resources Agency does not impose any such policy or requirement for properties located at the downstream end of the watershed, but rather oversees that runoff flow at the downstream of the watershed is not delayed to avoid runoff from occurring at the peak flow of the river.

### **Chapter 3.2 Hydrology and Water Quality**

Attached are comments received from our consultant Balance Hydrologics, Inc., which we request be responded to by the EIR consultant. (See Attachment 1.)

### **Chapter 3.3 Biological Resources**

There is no analysis of the restoration plan for the habitat preserve in the biological resources chapter and cumulative impacts section of the Draft EIR. The omission of this key component of the project has resulted in an inaccurate description of project impacts, and the inclusion of unnecessary mitigation measures. In addition, attached are comments received from our biological consultants Zander Associates and Staub Forestry & Environmental Consulting, which we request that the EIR consultant also respond to. (See Attachments 2 and 3.)

### **Chapter 3.4 Aesthetics**

Figure 3.4-6. As explained in the Draft EIR, there is an existing vegetated berm and buffer strip along the northern border of the project site behind the school and church properties adjacent to the project site, which render the project's visual impacts minimal. The visual simulation shown on Figure 3.4-6 does not account for the lower ground elevation of the proposed homes, and the berm vegetation, and therefore visual impacts shown in Figure 3.4-6 are overstated. Figure 3.4-6 should be replaced with a more accurate simulation.

Figure 3.4-8. This figure provides a good illustration of the vantage areas studied in the Draft EIR, and how views of the project are for the most part blocked from Carmel

Valley Road primarily due to already existing development along Carmel Valley Road. Page 3.4-16 of the Draft EIR also provides a good explanation regarding how most of the views of the project are blocked by intervening structures (such as the church and school) or vegetation, and that given the site's distance from Carmel Valley Road, the short duration of any views by passing vehicles, and the design of the homes, the two areas that the project may be visible from Carmel Valley Road are less than significant. There is a green line showing one of these two "visible" areas on Figure 3.4-8, which may not be correct since the illustration shows the line going through a building, which would appear to block views of the project. Please make any necessary corrections.

### **Chapter 3.8 Air Quality**

Page 3.8-20, Impact AIR-4. The Draft EIR discusses potentially significant impacts relating to construction activities and including the use of diesel-powered equipment occurring near the play fields at the Carmel Middle School. We understand that the EIR consultant conducted a health risk assessment that was based on a much larger project located in Sacramento involving over 400,000 cubic yards of fill, and has identified Mitigation Measure AIR-3 based on this assessment. We understand that Jones & Stokes is conducting a health risk assessment that is focused on the equipment and construction plan for this project. The results of this new assessment should be included in the EIR.

### **Chapter 3.9 Noise**

Mitigation Measure NOI-2. This mitigation provides for measures to reduce noise during construction, and includes the restriction or prohibition of construction traffic on Rio Road west of the project site. This mitigation measure also states that all construction equipment should access the site via Rio Road from Carmel Valley Road to minimize noise at existing residences. Some members of the public have expressed a desire for construction traffic to access onto the site via Rio Road from Carmel Valley Road, and then for such traffic to access off the site via Rio Road west of the project site. Our client would like to accommodate such requests, and request that the Draft EIR respond to this issue.

### **Appendix C**

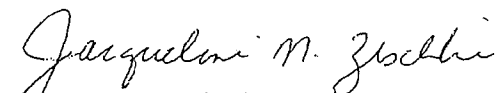
Table C-1, page 6. The consistency analysis under Section 7.1.1.2 refers to "critical habitat" being identified on the site for rare and endangered species. To the contrary, the project site is not located within any critical habitat area designated under either federal or state law. Please correct such references to critical habitat throughout the Draft EIR and corresponding analysis. (See for example page 4-7, Cumulative Impact BIO-C1, which states in part "ensure no net losses of critical habitats".)

Jacqueline Onciano  
March 7, 2008  
Page 5

If you have any questions regarding the above comments, please feel free to call me.

Sincerely,

**Derinda L. Messenger & Associates, PC**

  
Jacqueline M. Zischke

JMZ/rh

cc: Client



Balance  
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408-253-1111  
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March 6, 2008

Mr. Keith McCoy  
Rancho Cañada Village Partners  
24571 Silver Cloud Court, Suite 101  
Monterey, California 93940

**RE: Comments on the Hydrology and Water Quality Section of the Rancho Cañada Village Specific Plan Draft Environmental Impact Report**

Dear Mr. McCoy:

Thank you again for providing us with copies of the Draft Environmental Impact Report (DEIR) for the Ranch Cañada Specific Plan dated January 2008. We have taken the time to review the document in a general sense, with specific attention to the Hydrology and Water Quality section.

Our review identified several points or aspects of the material presented that we feel should be corrected as the environmental review process continues. We have summarized our review in the following comments, which are intended to provide clarification on these issues so that a clear and sound approach to flood control and stormwater management can be presented.

*Comments*

Our comments are presented with reference to the respective page number in the DEIR.

Page 3.2-5, Lines 5 and 6. The text makes reference to high temperatures varying from the low 60s in the winter to high 60s in the summer. We would suggest that the text be modified to read "average high temperatures varying from the low 60s in winter to the low 70s in late summer and early autumn".

Page 3.2-5, Line 31 and Page 2-9, Lines 38-40. Page 3.2-5 notes that two-thirds of the project site lies within the 100-year floodplain delineated by the Federal Emergency Management Agency, an accurate statement. As noted in the Preliminary Stormwater Management Plan (Balance, 2005) approximately 58 acres of the project lie within the floodplain. However, there may confusion with the reference on Page 2-9 (Project Description, Drainage) that states 20.1 acres is within the floodplain. The latter value is an appropriate assessment of the area of the floodplain where fill would be placed. We suggest the language on Page 2-9 be changed to read, "The project will place fill in approximately 20.1 acres within the FEMA-designated 100-year floodplain of the Carmel River.

Page 3.2-8, Lines 14 and 15. The DEIR notes that a Conditional Letter of Map Revision has been approved by the Army Corps of Engineers. This should be corrected to state the document was approved by the Federal Emergency Management Agency (FEMA). Line 15 should be also be revised to note that

Mr. Keith McCoy  
March 6, 2008  
Page 2

the floodplain and floodway boundaries would be effectively moved if the project is built as described. The FEMA mapping is not actually changed until the project is constructed.

Pages 3.2-14 and 3.2-15, Other NPDES Permits. The DEIR states that an individual NPDES permit would be needed for brine disposal. We do not anticipate any reason why the project, during the construction phase or in the post-project condition, would necessitate disposing of or discharging brine and recommend that this section be removed.

Page 3.2-20, Line 4. Mitigation Measure HYD-1 notes that the preliminary stormwater management plan will be implemented to maintain on-site infiltration *and control peak flows*. We suggest that the text be corrected to read "to maintain on-site infiltration and manage peak flows." As discussed in the last paragraph of this section, the project does not intend to reduce peak flows from the site to pre-project levels during large storm events since this would generally have adverse impacts on the peak flows within the Carmel River. Modeling highlighting the importance of timing of flows in the lower river system was presented in the Preliminary SWMP and correctly interpreted within the remaining text related to HYD-1.

Page 3.2-20, Lines 8-14. The DEIR correctly notes that the project has identified elements of an overall approach to address existing off-site drainage issues involving runoff from County Drainage Area 27 (DA27). However, this infrastructure including a new 84-inch diameter regional storm drain line near the northwest corner of the project area does not constitute mitigation for the project. The DEIR text should clearly identify that the suggested improvements are not needed to address drainage from the project; all of the runoff in question originates in off-site areas. Additionally, Line 9 states that the suggested 84-inch diameter storm drain would be located on-site. The Preliminary SWMP discussed the calculations and modeling supporting the size and configuration of the line, but did not state that the line would need to be located on the project property.

The fact that other works by the County (or others) would be needed to achieve a comprehensive solution for routing the DA27 runoff from Carmel Valley Road to the Carmel River strongly suggests that additional clarifying language be included in the Draft EIR. We recommend that the wording with respect to DA27 runoff be modified to note that the project applicant has been working with the County and community towards contributing some effort to construct stormwater conveyance infrastructure from its northwestern boundary to the Carmel River within a County drainage easement (either on- or off-site) at a time consistent with the County and CSA 50's other improvements to the DA27 system and tie-back levee.

Page 3.2-26, Lines 29-32. The DEIR text describes a Road and Drainage Systems Agreement with Monterey County as a component of Mitigation Measure HYD-7. We recommend that the sentence ending in Line 32 be modified to read "other on-site drainage facilities, exclusive of those facilities for runoff from County Drainage Areas 26 and 27". It is inappropriate to require the project to provide maintenance for this off-site drainage from Drainage Areas 26 and 27.

Page 3.2-27, Lines 12-13. As part of the discussion pertaining to Impact HYD-7, the DEIR notes that Balance Hydrologics has estimated annual post-project groundwater recharge to be on the order of 33.2 acre-feet. This is indeed the value presented in Table 7 of the Preliminary SWMP. However, it is important to note that the modeling summarized in that table only addressed infiltration of stormwater runoff that would be collected by the proposed storm drain system for the project. A potentially large additional volume of rainfall and/or runoff would infiltrate in the pervious areas of the project, including

Mr. Keith McCoy  
March 6, 2008  
Page 3

landscaping areas and the preserved open space. We suggest that the text be modified to note this and the fact that it would strongly indicate that the project will result in reduced demands for groundwater.

Page 3.2-28, Lines 25-31. The discussion of flood elevations correctly notes that no impacts are anticipated downstream of the project. In this respect, Lines 30 and 31 conclude that raising Rio Road by four feet would not have an adverse impact on flow patterns during a 100-year flood event. It is important to note that a floodwall with appropriate freeboard would provide the same flood control benefits and would not create other adverse impacts. Additionally, it is important to bear in mind that neither raising Rio Road nor providing a floodwall along the same alignment is required mitigation for project impacts. The flood hazard at that location would not be made worse by construction of the residential project alone, and base flood elevations would not increase downstream of the project if the road (or equivalent floodwall) were not built.

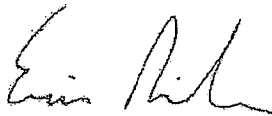
Page 3.2-29, Lines 26-28. Mitigation Measure HYD-9 recommends a floodwall or other reinforcement for the unconsolidated berms located almost exclusively off-site to the south and west of the project. We concur that protection of these berms from any increases in local flood velocities may be appropriate. However, the text in Lines 26-28 calls for hydraulic modeling to ensure that the additional improvements would not increase flooding or result in increased erosion. We would note that the berms in question are located at a point where hydraulic modeling (already completed) does not indicate significant increases in base flood elevations due to the project. Therefore, adequate bank protection can be provided at existing grades that would not require additional hydraulic modeling.

*Closing*

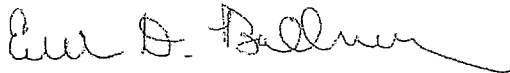
Thank you again for the opportunity to review the DEIR document and provide the comments above. Do not hesitate to contact us if you have any questions regarding the issues or suggests in this letter.

Sincerely,

BALANCE HYDROLOGICS, Inc.



Eric Riedner, P.E.  
Civil Engineer / Hydrologist



Edward D. Ballman, P.E.  
Principal Engineer



# ZANDER ASSOCIATES

*Environmental Consultants*

March 6, 2008

Keith McCoy  
Rancho Cañada Village Partners  
24571 Silver Cloud Court, Suite 101  
Monterey, California 93940

**Comments on Biological Resources Section  
Rancho Cañada Village DEIR  
Monterey County, California**

Dear Keith:

Zander Associates has reviewed the Biological Resources Section (Chapter 3.3) of the Draft Environmental Impact Report for the Rancho Cañada Village project prepared for the County of Monterey. The biological resources section was based in part on the biological resources assessment we prepared for the Hatton Parcel and on the Initial Biological Assessment prepared for Rancho Cañada Village by Rana Creek Habitat Restoration (2004). Following are our comments for your consideration.

## **GENERAL COMMENTS**

We cannot find any reference to the Restoration and Mitigation Plan in the Biological Resources Section of the DEIR. The October 2006 Restoration and Mitigation Plan contained detailed information on the 31.3-acre Habitat Preserve that will encompass the southern half of the project area, adjacent to the Carmel River. The plan includes descriptions of the restoration area, the habitat types that would be created, planting specifics, habitat preserve management, and monitoring and reporting. The Restoration and Mitigation Plan identifies measures to offset impacts to native vegetation and sensitive biological resources resulting from development in the northern half of the project area. Within the Habitat Preserve, 24.6 acres of existing golf course and disturbed/developed habitat will be restored to native riparian woodland, riparian scrub, grassland and wetland vegetation and many of the existing riparian trees will be preserved. Approximately 0.8 acre will encompass two stormwater infiltration basins that will help filter runoff from the development. The remaining 5.9 acres includes existing riparian woodland and river channel that will be preserved and managed. Sensitive tree species removed for the project will be replaced at a greater than 1:1 replacement ratio.

Guidelines for management of the preserve are included in the document, as well as a ten-year monitoring plan to track the progress of restoration and habitat management activities. The intent of the monitoring program is to detect challenges that are impeding habitat recovery, and to

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**ATTACHMENT 2**

quantitatively and qualitatively indicate when restoration and mitigation success has been achieved. Also, monitoring results will help to inform habitat management activities so that the Habitat Preserve can be adaptively managed to address and remedy impediments to restoration success. Specific success criteria are identified for an interim performance period and at the end of the ten-year monitoring period for each of the vegetation community types that are to be restored.

The measures provided for in the October 2006 Restoration and Mitigation Plan will have a positive impact in restoring 24.6 acres of existing golf course to natural habitat, well exceeding any mitigation that would otherwise be required for the project.

### **SPECIFIC COMMENTS**

#### **Pine Stands**

Due to the age and structure of the Monterey pine trees on the Hatton Parcel, these trees are not remnants of a naturally-occurring Monterey Pine Forest. The removal of these Monterey pine trees will not result in any potentially significant impacts, and do not require mitigation. We understand that Steve Staub of Staub Forestry will be providing further comments on this issue.

#### **Page 3.3-12: Special-Status Plants**

Eastwood's goldenbush (*Ericameria fasciculata*) is a perennial shrub with distinctive foliage that would have been identifiable at the time of any of the focused plant species surveys. Similarly, San Francisco gumplant also has distinctive foliage and even if not in bloom, any gumplant occurring in the project area would have been identifiable at the time of the focused plant surveys. No Eastwood's ericameria or any gumplant species were observed in the project area, which is why we concluded "Not Present" in the table included with the additional biological information submitted to the County in July 2006 (see first paragraph under General Comments above). Therefore, an additional plant survey in the summer for these plant species is unnecessary.

#### **Page 3.3-32: Impact BIO-3: Loss or Disturbance of Special-Status Plant Occurrences**

There are no special-status plant species present in the project area.

#### **Page 3.3-33: Mitigation Measures BIO-3 and BIO-4**

These mitigation measures are unnecessary because there are no special-status plant species in the project area.

#### **Page 3.3-39-42: Impacts BIO-7 and BIO-8, and Corresponding Mitigation Measures**

There is a statement that up to 17.5 acres of potential aestivation/upland habitat for California red legged frog along the perimeter of the golf course will be removed. We cannot replicate that acreage figure based on our survey of the property or on information reported in the DEIR. Also, at Page 3.3-42, the first sentence on the top of this page states that the project would remove 17.5 acres of potential aestivation habitat for California tiger salamander in disturbed/open coyote brush scrub and along drainages. This statement is also unsubstantiated.

Drainages are not typically considered suitable aestivation habitat for CTS and there are some steep and densely vegetated slopes on the Hatton parcel that would be difficult for CTS to access and probably would not be considered suitable aestivation habitat. If CTS are not breeding onsite and there are no known breeding ponds within 2 kilometers that are accessible to the project site (e.g. no substantial barriers like the Carmel River between the breeding pond and the project), then Mitigation Measure BIO-16 is inappropriate. This fact should be better explained in the DEIR.

Moreover, the Draft EIR does not acknowledge the 31.3-acre Habitat Preserve in the southern portion of the project area that will be restored to native habitat. The Habitat Preserve will be immediately adjacent to the Carmel River and will extend out from the river between 600 and 800 feet for its entire length. The restoration activities will convert existing golf course turf to native grassland and brushland and expand the riparian woodland canopy along the river bank. All of these measures will not only adequately mitigate loss of potential habitat for CRLF and CTS, but will also improve any habitat for CRLF and CTS over current conditions and on the remainder of the site, if present. Consequently, the DEIR should not require that mitigation for loss of potential habitat for CRLF and CTS take place offsite. Rather, it should acknowledge the potential for mitigation onsite and state that final determination will be made in consultation with USFWS through the take authorization process.

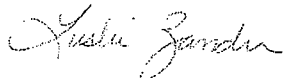
**Page 3.3-43-3.3-45; Impacts BIO-10 and BIO 11 and Corresponding Mitigation Measures.**

During our survey, we did not observe the western burrowing owl, nor did we observe any suitable burrows outside of the golf course. The burrowing owl was also not observed in the project area by Rana Creek Habitat Restoration during its surveys in 2003 and 2004. The habitat outside of the fairways is too brushy and too dense with thick grass and other herbaceous vegetation to be suitable for burrowing owl. Consequently, the additional surveys recommended in Mitigation Measures BIO-19 and BIO-20 are not warranted.

Neither Zander Associates nor Rana Creek Habitat Restoration observed any individuals of tricolored blackbird in the project area. As acknowledged in the DEIR, the potential for tricolored blackbird to nest in the area is low due to the limited habitat. It is the nesting colonies of tricolored blackbird that are of concern to CDFG, not foraging individuals. Consequently, extensive surveys outside of the project area as recommended in Mitigation Measure BIO-21 are not warranted. Rather, a pre-construction survey to confirm that no colonies have established on the project site should be adequate to avoid/minimize potential impacts on tricolored blackbird.

If you have any questions, please give me a call.

Sincerely,



Leslie Zander  
Principal Biologist



February 26, 2008

County of Monterey  
Department of Planning and Building Inspection  
Ajana S. Knaster, Chief Assistant Director  
2620 1<sup>st</sup> Avenue  
Marina, CA 93933

**Forester's Comments on Monterey Pine Stands and the DEIR for Rancho Canada Village**

As the professional forester who prepared the tree inventory for the project area and with extensive background in conservation and management of native Monterey pine stands, I have reviewed the discussions and recommendations regarding Monterey pine in the Draft EIR and have the following comments.

The DEIR notes that native Monterey pine forest is considered a sensitive community by the California Department of Fish and Game and suggests that the scattered small stands of Monterey pine on the existing golf course are of planted origin. My review of the site and course history confirms that all of the Monterey pines on the golf course are of planted origin from undetermined seed stock.

The DEIR indicates that the 0.2 acres of Monterey pines on the Hatton parcel might possibly be native but could well have been planted for landscaping. The DEIR mentions uncertainty as to whether the site has been disturbed or graded previously and the presence of native coastal scrub species as factors affecting their reluctance to rule out the possibility that the small patch of trees might be native. However, Table 3-3.3 of the DEIR shows that there is low likelihood that native Monterey pine stands occur within the project area, including the 0.2 acre stand on the Hatton parcel that "is likely to be introduced." The DEIR also notes that the Rancho Canada Village study area was mapped in a 1994 Jones and Stokes report as having scattered Monterey pines of less than 20% canopy cover and found in urban, urban park, and golf course settings.

I inspected the Hatton parcel's Monterey pines in September of 2006 and again in February 2008 and found only 11 live pine trees ranging from 4" to 16" in diameter and 15' to 45' in height. Growing on the adjacent school parcel was a linear grove of Monterey pines planted in rows at tight spacing. Native Monterey pine habitat is known to occur nearby north of Carmel Valley Road on slopes and swale bottoms underlain by Monterey shale parent material.

My conclusion after reviewing site conditions and the trees on the Hatton parcel as well as pertinent literature and resource materials on native Monterey pine is that the Monterey pines on the Hatton parcel are not a native stand of Monterey pines and can and should be removed as non-native trees of uncertain origin.

My finding is based on the following: 1) The 0.2 acres of the Hatton parcel now growing 11 Monterey pines have been significantly disturbed for grazing and agriculture during the historic period, but only minor grading or discing appear to have affected immediate site topography unlike adjoining grading for the school and church parcels. 2) Close inspection of the site found that the 11 living pines and adjoining dead pines are planted in rows and are remnants of a wider rectangular planting that followed the same narrow spacing of the nearby linear grove of pines planted on the school parcel. The planting pattern is not obvious because most of the trees have died and/or been removed while the 11 live trees occur irregularly with no apparent pattern as a tight cluster of 4 near the northwest corner, a very tight line of three next to the southeast corner, and 4 widely separated individual trees, three of which are the last in the easternmost row of the original planting. 3) The 1994 mapping of scattered Monterey pine on the project site cited in the DEIR is Figure 9 - "Present Distribution of Monterey Pine Forest by Land Use" - from Jones and Stokes report Monterey Pine Forest Ecological Assessment. This mapping shows present distribution from aerial photos and land use and is not a definitive mapping of native Monterey pine forest habitat. The Rancho Canada site was not field visited during preparation of the map, which includes other valley bottom sites by the Carmel River which are known to be golf courses whose Monterey pines were planted and are growing on soils that are not considered native Monterey pine forest soils. None of the prior studies of native Monterey pine forest habitat (McDonald, 1959; Forde, 1964; Roy, 1966; McDonald and Laacke, 1990; Huffman, 1994) ever included or mapped valley bottom areas between Carmel Valley Road and the Carmel River as native Monterey pine forest. The scattered Monterey pines associated with golf courses on the Carmel Valley floor are altogether different from Monterey pine stands growing between fairways on golf courses in native Monterey pine habitat in Pebble Beach and portions of Monterey. 4) There is no record of the origin of the Monterey pine planting stock used for the golf courses or Hatton parcel, but it is known that excess seed from propagation programs in Australia and New Zealand was widely used by nurseries in California during from the 1940s into the 1980s. Therefore there is a real chance that the Hatton parcel trees are a potential contaminant to native Monterey pine genetics rather than a potentially valuable resource. 5) Loss of the few trees and minimal associated habitat values of the Hatton parcel pines cannot reasonably be considered to reach a potentially significant impact level requiring mitigation when contiguous native Monterey pine habitat in Jacks Peak, Pacific Meadows and Del Mesa Carmel is already permanently protected immediately north of Carmel Valley Road and near the project area.

Conserving native Monterey pine forest habitat should remain a priority for the County, but it is not a factor affecting the Rancho Canada Village site.

Submitted by:



Stephen R. Staub  
Registered Professional Forester  
License Number 1911  
ISA Certified Arborist #WE-6739A