

Monterey Bay Chapter

California Native Plant Society

2 Via Milpitas
Carmel Valley, CA 93924
Oct. 5, 2006Mike Novo, Acting Planning Director
Monterey County Planning and Building Inspection Dept.
168 West Alisal St., 2nd Floor
Salinas, CA 93901

Subject: Draft Environmental Impact Report (DEIR) for the 2006 General Plan

Dear Mr. Novo:

The Monterey Bay Chapter of CNPS would like to submit the following comments on what has become known at GPU4.

We are deeply concerned that in many cases this document is claimed to have fewer impacts than the 1982 General Plan, which is certainly to be expected because of the additional constraints that are recognized by today's planners. However, the actuality is that this document, in almost all cases with which we are familiar, would increase the environmental impacts and worsen the quality of life for our citizens. Because of the loosening of standards in many areas, the impacts on biological resources, our chief concern, would be unacceptably increased. The generally appropriate goals cited under General Land Use in GPU4 appear to be based largely on GP82, but the detailed policies to carry them out are frequently inconsistent, allowing serious impacts particularly on biological resources. Under Conservation and Open Space, there are policies proposed that would seriously weaken protection of our county's plant and animal resources.

For example, OS-5 in GPU4 is extremely inadequate if not legally defective in limiting protection of plants to those listed by the State or Federal agencies as threatened or endangered. CEQA requires consideration of all species identified as sensitive or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Services. We urge you to return to the much sounder policies of GP82. We do not object to replacing "The California Native Plant Society" in the sentence under Policy 11.1 from GP82 with "Qualified scientists' shall be consulted and appropriate measures shall be taken to protect rare and endangered plant species and their habitat."

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OS-5.2 is severely weakened from GP82 policy 7.1.1. We urge retention of the latter policy, which states: "Development shall be carefully planned in, or adjacent to, areas containing limited or threatened plant communities, and shall provide for the conservation and maintenance of the plant communities."

OS-5.4 states "Landowners and developers shall be encouraged to preserve the integrity of existing terrain and native vegetation in visually sensitive areas such as hillsides, ridges, and watersheds. Routine and ongoing agriculture shall be exempt from this policy." The latter activities should be carefully spelled out, as some types of ag activities can be very destructive of hillsides, ridges, and watersheds, and should not be given a blank check.

OS-5.5 deserves strong support for encouraging the use of drought-tolerant native plants.

AG-3.3 lists but is not limited to routine and ongoing agricultural activities that may be exempt from GPU4 policies. This list includes several activities that could be harmful to the public health and welfare. These include conversion of previously uncultivated rangeland to cultivated agricultural use



Dedicated to the preservation of California native flora



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which should not be allowed on slopes over 25% because of recognized problems with erosion, loss of important wildlife habitat, loss of oak woodlands, increased use of water and chemical inputs, etc.; fumigating and other pest control activities; and streambank alterations. We urge that these areas specifically not be included in exempted activities.

CV-62 states that conversion of uncultivated vegetation to agriculture "should be discouraged". The existing policy prohibiting conversion of uncultivated slopes in excess of 25% should be retained for the reasons listed above.

The native Monterey Pine Forest is a sensitive biological resource that at the present time does not even have the protection accorded much less threatened species such as redwoods, oaks, and madrones, which all have special protections in the Monterey Co. Tree Ordinance. It is a serious oversight that the Monterey pine (*Pinus radiata*) is not protected in either the Carmel Valley Area Plan, the Greater Monterey Peninsula Area Plan or the overall General Plan. Some years ago when scientists became alarmed by the spread of pitch canker and urged that healthy Monterey pine should be preserved, CNPS and other groups asked Supervisor Dave Potter to propose an ordinance to protect the native pine trees. He responded that the time to do that would be during the GP update. So now is the time!

CV-1.19 lists criteria for mines and quarries. Because of the severe erosion problems that the Carmel River has had over the years, mines and quarries can no longer be justified in the Carmel River watershed because of the severe environmental damage they cause.

CV-3.7 should also include the Monterey Pine Forest.

CV-3.11 should include the Monterey Pine Forest in the first sentence.

CV-51 states: "New development that causes a drawdown of the aquifer shall be designed in a manner so that it does not threaten natural vegetation." Drawing down the aquifer is likely to harm or kill riparian vegetation that keeps the river banks from eroding away in high water. It is prohibited by the MPWMD. The State Water Resources Control Board has already determined that the Carmel River is overpumped by over 10,000 acre feet per year. The policy should be deleted or revised as follows: "New development is prohibited that would draw down the Carmel River aquifer."

GMP-3.2: please retain the wording in the 1982 GMPAP "In order to preserve scenic and rural character, ridgeline development shall not be allowed unless a special permit is first obtained."

GMP-3.3: delete d) and e)

GMP-3.5: add Monterey Pine Forest as c).

We understand that the Planning Commission is currently discussing these issues. We would appreciate it very much if you would be kind enough to see that the commissioners receive a copy of these comments. Thank you for your consideration.

Sincerely yours,

Mary Ann Matthews
Mary Ann Matthews
Conservation Chair

Post-It* Fax Note	7871	Date	10-6-06	# of pages	2
To	Mike Novo	From	M.A. Matthews		
Co. Dept.	Mon. Co. Plan Dept	Co.	Mon. Bay Chap CNPS		
Phone #		Phone #			
Fax #	757-9516	Fax #	659-0804		