

Exhibit F

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Memorandum

Date: April 26, 2023

To: Studio Schicketanz
3659 The Barnyard
Carmel-By-The-Sea, CA 93923

From: Josh Harwayne
Senior Project Manager
Denise Duffy & Associates, Inc.

Subject: 3600 Redwolf Drive, Carmel, CA, APN 416-011-017-000
Biological Impact Analysis of Revision 3, PLN 220336 and Revised Restoration Plan

Background

During November 2022, Studio Schicketanz submitted an application request to the County of Monterey Resource Management Agency (RMA) for a revision (“Revision 3”) to the approved design allowed by Planning File PLN 180383. RMA Planning File PLN 180383 consists of a Coastal Administrative Permit for the construction of a single-family dwelling, attached garage, pool, hot tub, patio, photovoltaic cells, well, septic system, access road/driveway, and associated grading as well as a Coastal Development Permit to allow development within 100 feet of environmentally sensitive habitat. The approved development envelope is approximately one acre with areas outside of the development envelope protected by a conservation and scenic easement. Revision 3 includes development of a new 1,448 square foot (sf) pool, 425 sf guest house, foot paths and patios, installation of ground-mounted photovoltaic panels, 443 sf of ground-mounted solar heating for the pool, and a power generator and enclosure.

Denise Duffy and Associates (DD&A) reviewed mitigation and restoration requirements defined by the relevant conditions of PLN 180383 and assessed the footprint of the proposed Revision 3 development to determine if it could result in additional significant impacts to biological resources. DD&A’s evaluation included a field survey and mapping effort to locate and map special status plants. DD&A also reviewed the existing approved Restoration Plan associated with PLN 180383 prepared by Studio Schicketanz (2019) and developed an updated restoration plan graphic (Attached – **Figure 1**) to reflect the current design, applicable mitigation ratio, and findings of the impact analysis described herein.

Findings

Review of Existing Mitigation and Restoration Requirements

Under PLN 180383, Mitigation Measure (MM) #1 and MM #9 require preparation of a landscaping plan and define restoration areas as: *abandoned sections of road, areas exposed and disturbed by construction, septic tank and leach field areas, all other exposed or disturbed areas on the property, and any areas off-*

site that are identified or required for restoration and replanting. MM #9 makes an exception for retention of the existing roadway that provides access to Big Sur Land Trust and Department of Parks and Recreation property west of the subject property (**Figure 1**). Therefore, disturbed areas on the property that are not part of the development infrastructure, formal landscaping, or access must be restored to native maritime chaparral habitat.

A required acreage of maritime chaparral restoration is not specified by MM #1 or MM #9. However, MM #5 requires mitigation at a 2:1 ratio for the loss of special-status plants that have been documented on the property. Under PLN 180383, MM #5 required replacement of approximately 0.25-acre of Hooker’s manzanita (*Arctostaphylos hookeri* ssp. *hookeri*), a California Rare Plant Rank (RPR) 1B.2 species, lost due to the approved development at a 2:1 ratio resulting in a total of 0.50-acre of required Hooker’s manzanita restoration. MM #5 also requires infill planting of small-leaved lomatium (*Lomatium parvifolium*) and Monterey ceanothus (*Ceanothus rigidus*), both California RPR 4.2 species, at quantity of 30 plants each. Thus, the minimum restoration area required to satisfy MM #5 under PLN 180383 is 0.50 acre. Any additional impacts to special-status plant species due to an expanded development footprint of Revision 3 will require application of the same 2:1 mitigation ratio and an increase to the minimum restoration acreage.

Field Survey and Revision 3 Impact Analysis

DD&A surveyed the footprint of the proposed Revision 3 development on September 30, 2022, to identify and map special-status plant occurrences, including Hooker’s manzanita and Monterey ceanothus. Both of these species are perennial woody shrubs and were identifiable to species at the time of the survey. A follow-up survey was performed on February 24, 2023, to inspect the Revision 3 footprint for small-leaved lomatium, which is most easily identified during late winter – early summer.

The field survey found that approximately 0.012 acre of Hooker’s manzanita will be impacted by the Revision 3 development. Small-leaved lomatium and Monterey ceanothus individuals, as well as other special-status plants, are absent from the Revision 3 development area. Adding the additional area of impacted Hooker’s manzanita to the existing 0.25 acre of impact and applying the 2:1 mitigation ratio defined by PLN 180383 and MM#5 results in a new minimum restoration area of approximately 0.524 acre (**Table1**).

Table 1 - Impact and Mitigation Summary

Species	Impacted Area	MM #5, 2:1 Mitigation Ratio
Summary of PLN 180383 Impacts and Mitigation		
Area of Hooker’s Manzanita	0.25 acre	0.50 acre
Number of Monterey Ceanothus	15 plants	30 plants
Number of Small-Leaved Lomatium	15 plants	30 plants
Summary of Additional Revision 3 Impacts and Mitigation		
Area of Hooker’s Manzanita	0.012 acre	0.024 acre
Number of Monterey Ceanothus	0 plants	0 plants

Species	Impacted Area	MM #5, 2:1 Mitigation Ratio
Number of Small-Leaved Lomatium	0 plants	0 plants
Summary of Total Impacts and Mitigation PLN 180383 + Revision 3		
Area of Hooker’s Manzanita	0.262 acre	0.524 acre
Number of Monterey Ceanothus	15 plants	30 plants
Number of Small-Leaved Lomatium	15 plants	30 plants

Revised Restoration Plan

DD&A prepared a revised Restoration Plan graphic depicting areas on the property where revegetation will occur (Attached – **Figure 1**). As required by MM #1, revegetation will occur in all abandoned sections of road, areas disturbed by construction, septic and leach field areas, and other exposed or disturbed areas. Areas not identified for revegetation on **Figure 1** consist of access roads, maintenance access, parking, the residential development and associated infrastructure or equipment, or formally landscaped areas. The total area of revegetation shown on **Figure 1** is 0.690 acre, which exceeds the minimum acreage of 0.524 described above. The location of revegetation areas may be adjusted based on as-built conditions as long as the criteria defined in the permit conditions and the minimum mitigation acreage described above is achieved.

Conclusion

Based on DD&A’s review of the permit conditions, the Revision 3 design, and field inspections performed during fall 2022 and winter 2023, the mitigation needed for reduction of impacts to biological resources to less than a significant level for the entire project can be achieved through restoration of the areas shown on **Figure 1**. Successful restoration will require adherence to the permit conditions and mitigation measures, as well as the materials and methodology outlined in the previously approved Restoration Plan (Studio Schicketanz, 2019).

Attachments

Figure 1 – Revised Restoration Plan

ACCESS TO NEIGHBORING BIG SUR LAND TRUST PROPERTY (TO REMAIN PER CONDITION 33, MM #9)

SEPTIC MAINTENANCE ACCESS (TO REMAIN)

SEPTIC LEACH FIELD

POOLHOUSE

RESIDENCE

MAINTENANCE ACCESS ROAD

EXISTING TANK ACCESS ROAD (TO REMAIN)

PATH

FUTURE PV ARRAY

UNDERGROUND PROPANE TANK LOCATION

3 FT MAINTENANCE PERIMETER AROUND PV PANEL

PV ARRAY

WELL SITE

FIRE ACCESS

WATER TANKS

**MINIMUM REVEGETATION AREA
REQUIRED FOR HOOKER'S MANZANITA = 0.524 AC**

REVISED REVEGETATION AREA = 0.690 AC

- Development Envelope
- Revised Revegetation Areas
- - - - Property Line

0 50 100 Feet



Revised Revegetation Plan

Brownrigg Residence



Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

Date
4-2023
Scale
1 in = 100 ft

Figure
1



Memorandum

Date: September 23, 2024

To: Studio Schicketanz
3659 The Barnyard
Carmel-By-The-Sea, CA 93923

From: Josh Harwayne
Senior Project Manager
Denise Duffy & Associates, Inc.

Subject: **3600 Redwolf Drive, Carmel, CA, APN 416-011-017-000**
Revised Restoration Plan

Background

In a previous memorandum, dated April 26, 2023 and forwarded to the County of Monterey HCD by Studio Schicketanz, Denise Duffy and Associates (DD&A) reviewed and summarized mitigation and restoration requirements associated with PLN 180383, reported findings from an updated assessment of impacts associated with Revision 3 (PLN 220336), and submitted a Revised Restoration Plan graphic for the above-referenced project. The April 26, 2023, memo and the Revised Restoration Plan graphic indicated that the complete project, including impacts associated with Revision 3, would impact a total of 0.262 acre of Hooker's manzanita, and 15 plants each of Monterey ceanothus and small-leaved lomatium. Mitigation at a 2:1 ratio, as required by the Conditions of Approval, would require restoration of at least 0.524-acre of Hooker's manzanita and establishment of at least 30 plants each of Monterey ceanothus and small-leaved lomatium.

In a second memorandum prepared by DD&A, dated November 8, 2023, and forwarded to the County of Monterey HCD by Studio Schicketanz, a second Revised Restoration Plan graphic was provided. The memo explained that Project impacts and the quantity of required mitigation remained unchanged. However, the configuration of the restoration areas was adjusted slightly to fit with refinements to the landscape design. In addition, the memo explained that re-alignment of a northern segment of the access road and associated restoration on an adjacent property shown on earlier versions of the plans was removed from the scope of work. The retention of the existing access road alignment was made possible by recordation of an easement allowing access through the neighboring property.

Revised Restoration Plan – September 2024

A third Revised Restoration Plan graphic prepared by DD&A is attached to this memo. This September 2024 revision depicts revegetation areas that accurately align with the most current site design and the as-built conditions. Like the November 2023 revision, this Revised Restoration Plan graphic depicts a total of 0.696 acre of restoration, which exceeds the 0.524-acre minimum noted above. As noted in the previous

memos, implementation will follow the specifications of the Restoration Plan approved under PLN 180383 (Sheet LS1.1 of the June 1, 2017, Construction Document Set). Restoration will return all disturbed areas on the property that are not part of the development infrastructure, formal landscaping, or access, to native maritime chaparral habitat.

Conclusion

Based on DD&A's review of the project impacts and Conditions of Approval, the mitigation needed for reduction of impacts to biological resources to less than a significant level for the entire project can be achieved through restoration of the areas shown on the attached Revised Restoration Plan graphic (Figure 1). Successful restoration will require adherence to the permit conditions and mitigation measures, as well as the materials and methodology outlined in the previously approved Restoration Plan (Sheet LS1.1 of the June 1, 2017, Construction Document Set).

Attachments

September 23, 2024, Revised Restoration Plan



SEPTIC
LEACH FIELD

POOL HOUSE

RESIDENCE

PV ARRAY
(E) WELL

(E) TANK
ACCESS ROAD

WATER TANK

**MINIMUM REVEGETATION AREA
REQUIRED FOR HOOKER'S MANZANITA = 0.524 AC**
REVISED REVEGETATION AREA = 0.696 AC

- Revised Revegetation Areas
- Development Envelope
- Property Line

0 40 80 Feet



Revised Revegetation Plan
Brownrigg Residence



Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

Date
9-2024
Scale
1 in = 80 ft

Figure
1

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