

**From:** [Novo, Mike x5176](#)  
**To:** [Smith, Richard x6408](#); [Maciel Pantoja, Yolanda x6618](#)  
**Subject:** FW: CNPS comments - ZA meeting December 6, 2018, agenda item ZA 18-071  
**Date:** Thursday, December 6, 2018 8:10:33 AM

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**From:** Nicole Nedeff [mailto:[nikki@ventanaview.net](mailto:nikki@ventanaview.net)]  
**Sent:** Wednesday, December 5, 2018 9:07 PM  
**To:** Novo, Mike x5176 <[NovoM@co.monterey.ca.us](mailto:NovoM@co.monterey.ca.us)>  
**Cc:** Swanson, Brandon xx5334 <[SwansonB@co.monterey.ca.us](mailto:SwansonB@co.monterey.ca.us)>  
**Subject:** CNPS comments - ZA meeting December 6, 2018, agenda item ZA 18-071

Hi Mike – Hope all is well with you and yours. I’ve been thankful for the rain!

CNPS Monterey Bay Chapter members are all volunteers, with limited time to review and comment on projects in Monterey County that have the potential to degrade our natural resources. I hope this brief email is considered during tomorrow’s Zoning Administrator’s meeting. Thank you.

ZA Hearing Agenda Item ZA 18-071.  
Comments on revisiting PLN 16031, PG&E Right-Of-Way project.

On behalf of the Monterey Bay Chapter of CNPS, thank you for reviewing and revising the previous Biological Assessment and Initial Study for the PG&E Right of Way grading and erosion control project proposed on private property in the North Monterey County Planning Area. CNPS is pleased that the Biological Assessment was revised, in consideration of comments submitted by CNPS on the original environmental review materials. Vegetation removal and grading is being considered in Environmentally Sensitive Habitat Area within the Coastal Zone. Maritime Chaparral and several very rare plant species will be eliminated by the proposed work.

In the revised Bio report, the addition of “Minimization Measures” to reduce impacts to sensitive habitats is helpful.

Table 3, “Performance Criteria” in the new Bio report is a welcome and necessary addition to the previous Biological Assessment. However, there are still serious, inadequate success criteria and mitigation requirements for this project. The proposed metric for success related to revegetation of three very rare, special status Maritime Chaparral shrub species is that only one of the three rare shrubs needs to be present in the damaged area after 3 years. If no rare shrub individuals are present, then the proposal is to seed these species.

This clearly is not adequate to mitigate for the loss of ANY of the rare Hooker’s manzanita, Pajaro manzanita or Eastwood’s goldenbush. This is a pretty lame success criteria for a project that impacts rare plants in ESHA and does not, and will not compensate for elimination of ESHA habitat or rare species.

CNPS is concerned with the lack of appropriate mitigation for the loss of rare plants and habitats,

and is VERY concerned about the cumulative impacts on biological resources resulting from projects proposed in utility right-of-ways if inadequate success criteria continue to be included as mitigation for ESHA habitat degradation.

Thank you, as always, for the opportunity to provide comments on projects that impact important environmental resources.

Nikki Nedeff  
President, Monterey Bay Chapter, CNPS