

# Attachment L

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CDFW appreciates its continued collaboration with Monterey County on the Harper Canyon Project. After review of the updated Mitigation Measure 3.3-8f, CDFW has the following comments:

## Building Envelopes

- MM 3.3-8f, first bullet point, 7<sup>th</sup> sentence states that, “Building envelopes, which are required to be designated in accordance with adopted Mitigation Measure 3.1-2b, shall be restricted to not exceed 1 acre in size, and future development, including fences, shall be limited to the building envelopes.”
  - CDFW appreciates including this updated language and recommends that a conservation easement (CE) be recorded over each lot to further restrict the potential for future development outside of the building envelope. The CE would be placed over the entirety of the lot with a maximum 1-acre allowance for the building envelope. Additionally, there could be specified allowances for related infrastructure, including utilities, and the development access road.
  - Also, CDFW recommends incorporating this portion of the building envelope restrictions as a separate mitigation measure that would be added as part of the Project approval, rather than a deferred item to be approved within the WCP.
- MM 3.3-8f, first bullet point, third sentence states that, “Corridors identified shall be depicted on the final map and no structures shall be permitted within these corridors. Any roads, utilities, or related subdivision improvements within these corridors shall be designed to ensure that they do not impede wildlife movement and provide for adequate under- or overcrossings where appropriate, as determined appropriate by the qualified wildlife corridor expert”. CDFW concurs with this portion of the mitigation measures but recommends it be clarified that the *building envelopes* would be sited outside of these corridors, and, to the extent feasible, any access road or infrastructure allowances would be limited within these corridors.

## Fencing

- MM 3.3-8f, second bullet point, first sub bullet, second sentence states that, “Mitigation Measure 3.1-2b. Fencing specifications shall follow recommendations from “A Landowner’s Guide to Wildlife Friendly Fences: How to Build a Fence with Wildlife in Mind” (available at: [https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=161708#:~:text=We%20recommend%3A&text=A%20top%20wire%20or%20rail,%E2%80%A2%20Preferably%2C%20no%20vertical%20stays](https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=161708#:~:text=We%20recommend%3A&text=A%20top%20wire%20or%20rail,%E2%80%A2%20Preferably%2C%20no%20vertical%20stays).)). No fencing, to preserve wildlife movement and habitat connectivity.” Recommend deletion of this sentence as the fencing

modifications restrict fencing to the building envelope and the wildlife friendly fencing guidance is no longer applicable.

## Lighting

- MM 3.3-8f, second bullet point, second sub bullet, second sentence provides the updated lighting minimization measures. Recommend the measure be further modified to clarify:
  - Use light only when and where needed: Lighting should serve a clear, intentional purpose demonstrated by thoughtful design, placement, aiming, brightness, and timing.
  - Avoid excessive lighting. Use the minimum brightness necessary and limit the duration to reduce glare and environmental disruption.
  - Direct light appropriately:
    - Fixtures should be mounted as low as feasible and directed only at their intended target.
    - All fixtures must be fully shielded so that the bulb or glowing element is not directly visible.
    - Prevent light trespass onto adjacent properties and upward emissions into the night sky.
    - Landscape and architectural lighting should be confined to the surface or feature being illuminated.
  - Control lighting duration:
    - Avoid continuous, all-night lighting—including for security purposes.
    - Use active control systems such as timers and motion sensors: Sensors should be calibrated to detect only large objects (e.g., people, large animals). The triggered lighting duration must not exceed five (5) minutes. Controls must default to the “OFF” position if they malfunction.
    - Maintain and adjust all lighting control equipment in accordance with manufacturer specifications.
  - Minimize blue light emissions:
    - Use lighting with a warm color temperature of 3,000 K or lower. Recommended options include amber, orange, and red LEDs, which emit longer wavelengths (greater than 560 nanometers) that are less disruptive to wildlife.
    - Always verify the correlated color temperature (CCT) using manufacturer specifications or product labeling, as it cannot be accurately judged by eye.
- Examples of acceptable fixtures and bulbs are found here: [Certified Wildlife Lighting | FWC](#)

## Livestock

- MM 3.3-8f, second bullet point, 16<sup>th</sup> sub bullet, second sentence provides the updated livestock measure. Recommend that hobby animals, such as horses, be restricted outside of the building envelope, with the exception of cattle.

### **Restrictions for Discing**

For areas outside the designated building envelope, CDFW recommends a measure be added to MM 3.3-8f to restrict the use of discing for vegetation maintenance and that less invasive vegetation maintenance methods such as mowing and weed whacking may be utilized for fuel reduction purposes.

### **Human Wildlife Conflict**

CDFW recommends that a measure be added to MM 3.3-8f to specify that Monterey County would retain a county trapper to proactively address and manage potential human-wildlife interactions within this area.

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