



A Land Use Planning and Design Firm

FACSIMILE TRANSMITTAL

To: Jim Arnold	From: Cara Galloway
Title:	Date: March 29, 1999
Company: FORA	Project: Hwy 218/North-South Road
Fax #: 883-3675	Project #: CS-216
Re: Rare Plant Letter	Pages (Including cover): 4

<input type="checkbox"/> Urgent	<input checked="" type="checkbox"/> For Your Review	<input checked="" type="checkbox"/> Please Reply
<input type="checkbox"/> Per Your Request	<input type="checkbox"/> Copy Also E-Mailed	<input type="checkbox"/> Hard Copy to Follow

Attached please find a draft of the letter I have prepared regarding the potential for rare plants (specifically Seaside bird's beak) to occur at the project site. Please review and let me know if this is what you have in mind. I will finalize the report and get it to you once I hear back from you.

I'll be out of office most of tomorrow and Friday, but I will hopefully be able to check messages and stop in for a few minutes. Please fax your comments or leave a message on my voice mail. Thanks.

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DRAFT

March 24, 1999

Mr. Jim Arnold
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

**Re: Highway 218/North-South Road
Implications for Rare Plants**

Dear Jim:

Per your request, I conducted a field investigation at North-South Road and Highway 218 on March 22, 1999 to determine the potential for rare plants, specifically Seaside bird's beak (*Cordylanthus rigidus* var. *littoralis*), to occur within the area in which road widening is proposed. I understand that North-South Road is to be widened from Highway 218 to just past South Boundary Road. I also understand that only the east side of North-South Road will be widened; no widening will occur on the west side of North-South Road.

Regulatory Background

The Department of the Army, concurrently with implementing its directive to close and dispose of the former Fort Ord, formalized negotiations with the United States Fish and Wildlife Service (USFWS) under Section 7 through the development of a Habitat Management Plan (HMP). The HMP effectively serves as the basis for the Army's "permit" for incidental take of federally-listed species under the Federal Endangered Species Act (ESA). However, the HMP has not been approved by the California Department of Fish and Game (CDFG). CDFG has given tentative approval to the HMP as adequate mitigation for HMP species but has requested that an Implementing Agreement, signed by all affected jurisdictions, be drafted as a binding state-level document.

The proposed project is located within an area designated "Development" in the HMP. Impacts to biological resources associated with development of these areas are mitigated in the HMP through the set-aside of habitat reserve areas within the boundaries of the former Fort Ord. From a federal perspective, special-status species included in the HMP are considered protected through implementation of the HMP, and in "Development" areas, no further mitigation is required to satisfy the USFWS.

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However, because CDFG has not given it's formal approval for the HMP, any potential impacts to state-listed species must be reviewed and considered by CDFG.

Vegetation Types Observed During March 22, 1999 Field Investigation

From Highway 218 to approximately 300 feet north of Highway 218, the roadway is elevated above a low-lying area containing predominantly willows, rushes, and other plant species associated with wet habitats. Coyote brush is the dominant plant type immediately adjacent to the raised roadway. The soil appeared dense and loamy.

From approximately 300 feet north of Highway 218 to South Boundary Road, the east side of North-South Road is very steep and contains a dense cover of coast live oak. There is very little open space within the oak canopy. Coyote brush, chemise and sage occur in the few open areas within the oak canopy that exist. The understory vegetation is predominantly miner's lettuce, annual lupines, and grasses.

Potential Special-Status Plant Species

Data from the USFWS, the CDFG, the California Native Plant Society (CNPS), the *Flora and Fauna Baseline Study of Fort Ord, California* (U.S. Army Corps of Engineers 1992), and the *Installation-Wide Multispecies Habitat Management Plan for Former Fort Ord, California* (April 1997) were reviewed to determine the potential for any special-status plant species to occur on the project site. The project site (east side of North-South Road from Highway 218 to just past South Boundary Road) was investigated to identify habitat types and condition, and to determine the potential for the project area to support special-status plant species.

Monterey spineflower, sandmat manzanita, Monterey ceanothus, and Eastwood's ericameria

The HMP lists Monterey spineflower, sandmat manzanita, Monterey ceanothus, and Eastwood's ericameria as having a high density of occurrence within the project area. Monterey spineflower is listed as "Threatened" by the USFWS but has no state status and is included on CNPS List 1B. Sandmat manzanita and Eastwood's ericameria do not have state or federal status, but they are included on CNPS List 1B. Monterey ceanothus is a USFWS "Species of Concern" and is included on CNPS List 4.

Monterey spineflower occurs in open, sandy sites in chaparral, woodland and grasslands. Sandmat manzanita occurs in closed-cone coniferous forest, coastal scrub and coastal dunes. Monterey ceanothus and Eastwood's ericameria occur in closed-cone coniferous forest and coastal scrub. Individuals of these species were not observed between Highway 218 and South Boundary Road, and are not expected to occur in that area because the wet habitat located near Highway 218 and the dense live oak habitat located near South Boundary Road do not provide appropriate habitat for these species.

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Sandmat manzanita and Monterey ceanothus were observed in the vicinity of the project site north of South Boundary Road; however, it is unknown if the proposed road widening will impact individuals of these species. Even if individuals of these species are impacted by the road widening project, because these species are all included in the HMP, and because the project area is designated "Development" in the HMP, no further mitigation is required beyond that identified in the HMP. Also, because these species are not listed by CDFG, no further review of the effect of the proposed project on individuals of these species is required by CDFG.

Seaside Bird's Beak

The HMP lists a specific population location of Seaside bird's beak on the west side of North-South Road in the vicinity of the proposed project site. However, the HMP does not identify any Seaside bird's beak on the east side of North-South Road, which is the location of the proposed roadway widening. Seaside bird's beak is a USFWS "Species of Concern", is listed by the CDFG as "Endangered", and is included on CNPS List 1B.

Seaside bird's beak occurs in dry, sandy soils in coastal scrub, woodland and chaparral. Individuals of this species were not observed in the project area, and are not expected to occur in the project area because the wet habitat located near Highway 218 and the dense live oak habitat located near South Boundary Road do not provide appropriate habitat for this species. Because the habitats within the project area are not appropriate for this species, and because the specific population location identified in the HMP is on the west side of North-South Road, which is not proposed to be affected during roadway widening, no consultation with the CDFG regarding this species should be necessary. Also, I understand that the CDFG has reviewed the Initial Study/Negative Declaration that was prepared for this project and did not indicate that any consultation regarding this species was required.

I hope that this letter adequately addresses your questions regarding the potential for special-status plant species to occur on the project site. If you have any questions, please call me at (831) 649-1799.

Sincerely,

Cara Galloway
Biologist/Senior Planner