



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



May 29, 2024

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
1441 Schilling Place, 2nd Floor
Salinas, California 93901
Phone: (831) 755-5233
spencerc@co.monterey.ca.us

**Subject: Harper Canyon (Encina Hills) Subdivision Project (Project)
Supplemental Draft Environmental Impact Report (SDEIR)
SCH No.: 2003071157**

Dear Craig Spencer:

The California Department of Fish and Wildlife (CDFW) received an SDEIR from Monterey County for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. While the comment period may have ended, CDFW respectfully requests that Monterey County still consider our comments.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

Conserving California's Wildlife Since 1870

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 2

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

PROJECT DESCRIPTION SUMMARY

Proponent: Harper Canyon Realty LLC

Objective: The proposed Project is 17-lot residential subdivision on approximately 164 acres, with a remainder parcel, approximately 180 acres in size, to remain as open space in unincorporated Monterey County. The proposed Project would also include the removal of 79 oak trees within the residential subdivision.

The SDEIR examines wildlife movement in more detail for the Project and focuses on the areas within and surrounding the Project, between the Fort Ord National Monument (Fort Ord), Santa Lucia Ranges, Toro Creek via under-crossing of State Route (SR) 68, overpasses along Portola Drive, and local/onsite drainages and culverts, and includes the review of previous research, including the Central Coast Connectivity Project and the 2008 WRA Environmental Consultants memorandum developed for the Ferrini Ranch EIR (SCH #2005091055).

Location: The proposed Project is located along the SR 68 corridor of Monterey County off San Benancio Road. The following Assessor's Parcel Numbers (APNs) comprise the Project site: 416-611-001 and 416-611-002.

Timeframe: Not specified.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist Monterey County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the CEQA document prepared for this Project.

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 3

The Project Draft Environmental Impact Report (DEIR), circulated in 2012, originally evaluated the potential for the Project to impact biological resources. Currently, the SDEIR acknowledges the potential for impacts to wildlife connectivity and evaluates the impact that the Project would have on connectivity between Fort Ord and Toro Regional Park (Toro Park) and proposes specific mitigation measures to reduce impacts to less than significant. CDFW is concerned that the mitigation measures proposed in the SDEIR are not adequate to mitigate for impacts to wildlife connectivity within the Project site as the current development footprint appears to significantly impact the vital wildlife habitat corridor between Fort Ord and the natural habitats south of SR 68, including Toro Park. CDFW's concerns are explained in more detail below.

Wildlife Connectivity

The Project's 17-lot residential subdivision would almost entirely block a primary wildlife corridor between Fort Ord and Toro Park and further isolate Fort Ord and the wildlife species that inhabit the monument (Attachment 1, Figure 1). Attachment 1, Figures 1 and 2, utilize The Nature Conservancy (TNC) Omniscape Connectivity Web Map (TNC 2024) dataset to model wildlife movement within and surrounding the Project site. As Attachment 1, Figures 1 and 2, depict, the majority of the residential subdivision is directly within the sole migratory pathway between Fort Ord and Toro Park. While the SDEIR recognizes the potential impacts to wildlife connectivity associated with the siting of the Project site, and specifically provides mitigation measures to protect a portion of the El Toro Creek corridor, CDFW is concerned that without the protection of the surrounding movement pathways identified in Attachment 1, Figures 1 and 2, the Project would not adequately mitigate for the impacts to wildlife movement.

The Central Coast Connectivity Project (CCCP), a collaborative project between The Big Sur Land Trust and Connectivity for Wildlife LLC (CFW) to study connectivity along the Central Coast, further highlights the importance of the Project site and surrounding area for wildlife connectivity. The CCCP specifically identifies important connectivity linkages between core habitat areas for wildlife between the Central Coast Mountain ranges including the Sierra de Salinas, Santa Lucia, Santa Cruz and Gabilan mountains, and, within the Project vicinity, notes that, "Any proposed and future development in these relatively intact natural lands without primary regard for wildlife, their habitat requirements and movement patterns could effectively and completely isolate populations and individuals of such sensitive and large ranging species as the North American badger and mountain lion. The isolation of these populations could lead to their local extinction in otherwise viable lowland and coastal habitats along the southern portion of Monterey Bay." Essentially, the CCCP notes that any development within the Project site that isn't focused on wildlife and enhancing connectivity has the potential to completely isolate wildlife populations within Fort Ord.

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 4

While the DEIR and SDEIR provide several mitigation measures to reduce wildlife connectivity impacts to less than significant, including limiting the installation of solid fencing and lighting, preparing a Wildlife Corridor Plan (WCP), and maintaining a 180-acre open space between Harper Creek and Toro County Park, CDFW is concerned that measures are not sufficient to reduce impacts to less than significant. For instance, the 180-acre open space identified in the SDEIR to mitigate for wildlife connectivity impacts and protect corridor areas identified in the CCCP, does not incorporate any of the movement pathways modeled in Attachments 1, Figures 1 and 2. CDFW would like to note that the entirety of the development area is located in these movement areas. Ultimately, CDFW is concerned the proposed Project footprint would permanently disrupt wildlife movement between Fort Ord and Toro Park, resulting in limited genetic diversity and gene flow, less resilient populations, and potentially a loss of populations over time. As noted in Hennings (2010), restricted gene flow between isolated populations, such as Fort Ord, could result in “cascading ecological effects”, especially for less mobile species.

Based on the information provided in Attachment 1, Figures 1 and 2, the CCCP, and the DEIR and SDEIR, CDFW is concerned that if the Project were to be implemented as currently proposed, and with the mitigation measures currently proposed, there is a strong likelihood that the linkage to Fort Ord would be severely constricted or lost entirely, especially for species that are less mobile or have large home ranges. Essentially, CDFW is concerned the proposed Project would likely lead to further fragmentation of already constrained habitat for a multitude of species.

As the proposed Project is located within a vital wildlife habitat corridor between Fort Ord and Toro Park, and the proposed mitigation measures do not appear sufficient to mitigate for impact to wildlife habitat connectivity, CDFW strongly recommends the following:

Comment 1: Retaining a minimum linkage width

As the proposed Project is likely to significantly restrict wildlife movement between Fort Ord and Toro Park, CDFW recommends the SDEIR be revised and that the Project site be redesigned to allow for a minimum 1.2-mile-wide corridor through the movement areas identified in Attachment 1, Figures 1 and 2 that are within the Project site, to maintain the linkage between Fort Ord and Toro Park. This corridor width recommendation follows the recommendations noted in the South Coast Missing Linkages Project (Penrod et al., 2006), a project focused on finding missing linkages, or corridors, in southern California, which notes that a minimum 1.2 miles width allows, “For a variety of species [...] a wide linkage helps ensure availability of appropriate habitat, host plants (e.g., for butterflies), pollinators, and areas with low predation risk.

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 5

[...] A wide linkage also enhances the ability of the biota to respond to climate change, and buffers against edge effects.”

Comment 2: Consultation with CDFW

It is recommended to consult with CDFW prior to redesign of the Project site to provide guidance on measures to reduce the potential for impacts to wildlife connectivity.

In addition to the concerns that CDFW has related to the Project’s impacts to wildlife connectivity, CDFW also has concerns about the ability of some the proposed mitigation measures to reduce impacts to less than significant and avoid unauthorized take for several special status animal species, including the State candidate threatened and specially protected mammal Southern California/Central Coast Evolutionary Significant Unit (ESU) Mountain lion (*Puma concolor*), the State and federally threatened California tiger salamander - central California Distinct Population Segment (DPS) (*Ambystoma californiense* pop. 1), and the State candidate endangered western bumble bee (*Bombus occidentalis*) and Crotch’s bumble bee (*Bombus crotchii*).

Mountain Lion

The mountain lion is a State specially protected mammal (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list the Southern California/Central Coast ESU of Mountain lion (mountain lion) as threatened under CESA (CDFW 2020a). As a CESA-candidate species, the mountain lion in southern and central coastal California receives the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085).

The Central Coast Central (CC-C) subpopulation of mountain lion is present within the Project site and the Central Coast North (CC-N) subpopulation is located to north near Santa Cruz. Both of these subpopulations are known to have connectivity problems where the two ESUs meet, and the impacts to gene flow for the species within and surrounding the Project site is of significant concern as isolation reduces genetic exchange of populations at risk of local extinction through genetic and environmental factors, preventing the recolonization of suitable habitats following local extirpation, ultimately potentially putting the species at risk of extinction.

The CC-C subpopulation provides essential gene flow to the CC-N subpopulation which is critically important for their long-term viability. The CC-C subpopulation is vulnerable to habitat loss from additional development pressure necessitating improving habitat connectivity to facilitate gene flow between adjacent areas though permanently protected lands (e.g., conserved through a conservation easement (CE)) and managed

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 6

in perpetuity (Dellinger et al., 2020). The CC-C region could have major effects on connectivity and population genetics in the adjacent mountain lion populations if further constrained. As such, CDFW is concerned that the proposed Project would have the potential to significantly impact mountain lion subpopulations that traverse SR 68 near the Fort Ord and Toro Park corridor identified in Attachment 1, Figures 1 and 2. As discussed above, the Project would restrict one of the only linkages between the two protected areas, likely isolate Fort Ord lands and limit movement of the CC-C mountain subpopulation north of SR 68 into monument lands, ultimately significantly fragmenting the available habitat for mountain lion to traverse. Additionally, the mitigation measures outlined in the SDEIR are unlikely to mitigate for the unavoidable direct and indirect, permanent, or temporal losses, of genetic connectivity between the CC-C and other subpopulations of mountain lion.

CDFW strongly recommends the SDEIR to be revised to contain a specific and focused analysis of impacts to dispersal and genetic exchange between mountain lion subpopulations, including a detailed analysis of issues with connectivity and fragmentation of mountain lion habitat adjacent to the Project. CDFW recommends that Attachment 1, Figures 1 and 2, be utilized to assist with further analyzing the impacts of gene flow disruption, to identify areas that provide permeability, and to assist with identifying the areas to conserve to facilitate movement. CDFW also recommends the SDEIR be revised to incorporate comments and 1 and 2 above and redesign the Project to adequately mitigate for impacts to mountain lion connectivity between Fort Ord and Toro Park. In addition, CDFW recommends the SDEIR also include the following:

Comment 3: Mountain Lion - No Night Work

To minimize impacts to movement of mountain lion during construction, CDFW recommends that no night work occur during construction of the Project.

Comment 4: Mountain Lion - Avoiding Use of Rodenticides

CDFW discourages the use of rodenticides and second-generation anticoagulant rodenticides due to their harmful effects on the ecosystem and wildlife. CDFW recommends prohibiting the use of such materials during Project activities.

Comment 5: Mountain Lion – Avoidance and Take Authorization

In the event that a mountain lion or den is detected during surveys, consultation with CDFW is warranted to discuss how to implement the Project and avoid take. If avoidance is not feasible, CDFW recommends the Project obtain an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b).

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 7

Comment 6: Human and mountain lion conflict

The Project would increase human presence adjacent to and within mountain lion habitat via increased residences and ongoing vegetation treatment in the remaining open areas. Increased human presence and associated factors such as traffic, noise, and light pollution, restrict mountain lion movement across the landscape. Most factors affecting the ability of mountain lion to survive and reproduce are caused by humans (Yap et al. 2019). As California's human population has continued to grow and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety, particularly if mountain lions do not receive CESA protection in the future. Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020). For example, mountain lions tend to avoid roads and trails by the mere presence of those features, regardless of how much they are used (Lucas 2020). This restriction in mountain lion movement may reduce gene flow and could increase the decline in genetic diversity of mountain lions in southern and central parts of the State (Dellinger et al. 2020). In addition, increased traffic could cause vehicle strike mortality. Also, mountain lions avoid areas with low woody vegetation cover and artificial outdoor lighting (Beier 1995). Ultimately, as human population density increases, the probability of mountain lion persistence decreases (Woodroffe 2000).

Comment 7: Mountain Lion –Awareness Signage

CDFW recommends that signage be installed at trailheads and posted within any community open space within the residential development identifying that the area is located in mountain lion habitat. Additional information from CDFW's Keep Me Wild Mountain Lion brochure may be included on the sign:

<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=57523&inline>

California Tiger Salamander

The SDEIR does not evaluate Project impacts to California Tiger Salamander (CTS) and the previous DEIR conducted some preliminary CTS surveys and noted that there were no CTS CNDDDB occurrences within the Project site and that CTS would not be impacted by the proposed Project. CDFW would like to note that CNDDDB is populated by and records voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record in CNDDDB does not mean a species is not present. CDFW would also like to note that it does not appear that surveys to inform the DEIR were conducted following the *Interim Guidance*

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 8

on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander (USFWS 2003) guidance document.

The Project site is within the known range of CTS and contains suitable habitat for the species, and CTS have been documented within both Fort Ord and Toro Park (CDFW 2024). Additionally, it does not appear that CTS surveys have been conducted since 2012, and the original surveys were potentially not adequate to detect CTS. CDFW would like to highlight the importance of the Project site for CTS connectivity, movement, and breeding. Attachment 1, Figure 3 illustrates potential areas of breeding habitat for CTS within the Project site. The highlighted areas (i.e., blue areas) within Attachment 1, Figure 3, depict (similarly to Attachment 1, Figures 1 and 2) that the Project is within an essential linkage area between Fort Ord and Toro Park for CTS breeding and movement. Any development within the Project site would likely limit genetic diversity and gene flow, impact the resiliency of CTS populations, and potentially impact entire CTS populations over time.

As such, CDFW strongly recommends the SDEIR incorporate comments 1 and 2 above and revise the SDEIR and redesign the Project to adequately mitigate for impacts to CTS connectivity between Fort Ord and Toro Park. In addition, CDFW recommends the SDEIR also include the following:

Comment 8: Consultation with CDFW

Consultation is recommended with CDFW to review the 2019 correspondence and surveys, confirm whether surveys following “Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander” (USFWS 2003) guidance document were last conducted, to provide guidance on further analyses and surveys, and to assist with determining whether the Project can avoid take.

Comment 9: CTS Surveys Prior to Project Implementation

CDFW recommends that a qualified biologist evaluate potential Project-related impacts to CTS the survey season(s) immediately prior to Project implementation using the “Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander” (USFWS 2003) guidance document.

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 9

Comment 10: CTS -Take Authorization

If through consultation with CDFW, surveys, or during construction, it is determined that CTS are occupying the Project site and take cannot be avoided, CDFW recommends the Project obtain an ITP, pursuant to Fish and Game Code section 2081 subdivision (b). In the absence of protocol surveys, the applicant can assume presence of CTS within the Project site and immediately focus on obtaining an ITP. For information regarding ITPs, please see the following link:

<https://www.wildlife.ca.gov/Conservation/CESA>. Included in the ITP would be measures required to avoid and/or minimize direct take of CTS in the Project site, as well as measures to fully mitigate the impact of the take.

Crotch's Bumble Bee and Western Bumble Bee

Since the circulation of the Project DEIR in 2012, Crotch's bumble bee (CBB) and western bumble bee (WBB) have been listed under CESA. As of September 30, 2022, CBB and WBB are candidate species under CESA, and as such, receive the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085). It is illegal to import, export, take (hunt, pursue, catch, capture, or kill, or attempt engage in any of these activities), possess, purchase, or sell CBB or any part or product thereof (Fish & G. Code, §§ 86, 2080, 2085). As CBB and WBB were not included as part of the biological resource analyses in the DEIR and SDEIR and there is potential for the species to occur within the Project site, CDFW recommends the following:

Comment 11: WBB and CBB - Habitat Assessment

CDFW recommends a qualified biologist conduct a habitat assessment to determine if the Project site and the immediate surrounding vicinity contain habitat suitable to support WBB and CBB. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the assessment

Comment 12: WBB and CBB -Focused Surveys Prior to Project Implementation

If potentially suitable habitat is identified, CDFW recommends that a qualified biologist conduct focused surveys for CBB and WBB, and their requisite habitat features, following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023). If WBB or CBB needs to be captured or handled as part of the survey effort, please note that a 2081(a) Memorandum of Understanding (MOU) with CDFW will be needed (CDFW 2023).

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 10

Comment 13: CBB and WBB Take Authorization

If CBB and or WBB is detected, then CDFW recommends that all small mammal burrows and thatched/bunch grasses be avoided by a minimum buffer of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement Project activities and avoid take. Any detection of CBB prior to or during Project construction warrants consultation with CDFW to discuss how to avoid take.

If take cannot be avoided, CDFW recommends acquiring an ITP pursuant to Fish and Game Code Section 2081(b), prior to initiating ground-disturbing activities.

EDITORIAL NOTES AND SUGGESTIONS

Lake and Stream Alterations

Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation); (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's website (<https://wildlife.ca.gov/Conservation/LSA>) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.

Cumulative Impacts

CDFW recommends evaluating how this Project alongside other pending projects will impact this area. A full and thorough analysis of cumulative impact is strongly recommended as to contribute to the full understanding of how this project will impact this area and the wildlife that depends on it. CDFW recommends that this cumulative impact analysis be conducted for all biological resources that will either be significantly

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 11

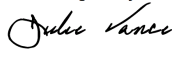
or potentially significantly impacted by implementation of the Project, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the Project, even if those impacts are relatively small (i.e., less than significant). CDFW recommends cumulative impacts be analyzed for the following species using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the Project. An appropriate resource study area should be identified and mapped for each resource being analyzed and utilized for this analysis. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

CONCLUSION

CDFW appreciates the opportunity to comment on the SDEIR to assist Monterey County in identifying and mitigating this Project's impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>). Please see the enclosed, Attachment 2, Mitigation Monitoring and Reporting Program (MMRP) table, which corresponds with recommended mitigation measures in this comment letter. Questions regarding this letter or further coordination should be directed to Evelyn Barajas-Perez, Environmental Scientist, at (805) 503-5738 or evelyn.barajas-perez@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...

Julie A. Vance
Regional Manager

ec: State Clearinghouse
Governor's Office of Planning and Research
State.Clearinghouse@opr.ca.gov

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 12

REFERENCES

- Beirer, P. 1995. Dispersal of juvenile cougars in fragmented habitat. *The Journal of Wildlife Management*. 59(2): 228-237.
- California Department of Fish and Wildlife. 2013. Human/wildlife interactions in California: mountain lion depredation, public safety, and animal welfare. Departmental Bulletin, Sacramento, CA.
- California Department of Fish and Wildlife. 2023. Survey considerations for California Endangered Species Act (CESA) candidate bumble bee species. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>.
- California Department of Fish and Wildlife. 2024. Biogeographic information and observation system. <https://www.wildlife.ca.gov/Data/BIOS>. Accessed 15 May 2023.
- Dellinger J., K. Gustafson, D. Gammons, H. Ernest, S. Torres. 2020. Minimum habitat thresholds required for conserving mountain lion genetic diversity. *Ecology and Evolution*. 10:10687–10696.
- Hennings, L. and J. Soll. 2010. Wildlife corridors and permeability: A literature review. Metro Sustainability Center, Portland, OR.
- Lucas, E. 2020. Recreation-related disturbance to wildlife in California – better planning for and management of recreation are vital to conserve wildlife in protected areas where recreation occurs. *California Fish and Wildlife, Recreation Special Issue 2020*: 29-51.
- Penrod, K., C. Cabañero, P. Beier, C. Luke, W. Spencer, and E. Rubin. 2006. South Coast missing linkages project: A linkage design for the Sierra Madre-Castaic Connection. South Coast Wildlands, Idyllwild, CA.
- The Nature Conservancy. 2024. Omniscape Explorer. <https://omniscape.codefornature.org/>. Accessed 20 May 2024.
- U.S. Fish and Wildlife Service. 2003. Interim guidance on site assessment and field surveys for determining presence or a negative finding of the California tiger salamander. Sacramento, California, USA.
- Woodroffe, R. 2000. Predators and people: using human densities to interpret declines of large carnivores. *Animal Conservation*. 3: 165-173.

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 13

Yap, T., Cummings, B., and J.P. Rose. 2019. A petition to list the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of mountain lions as threatened under the California Endangered Species Act (CESA). Available from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=171208&inline>.

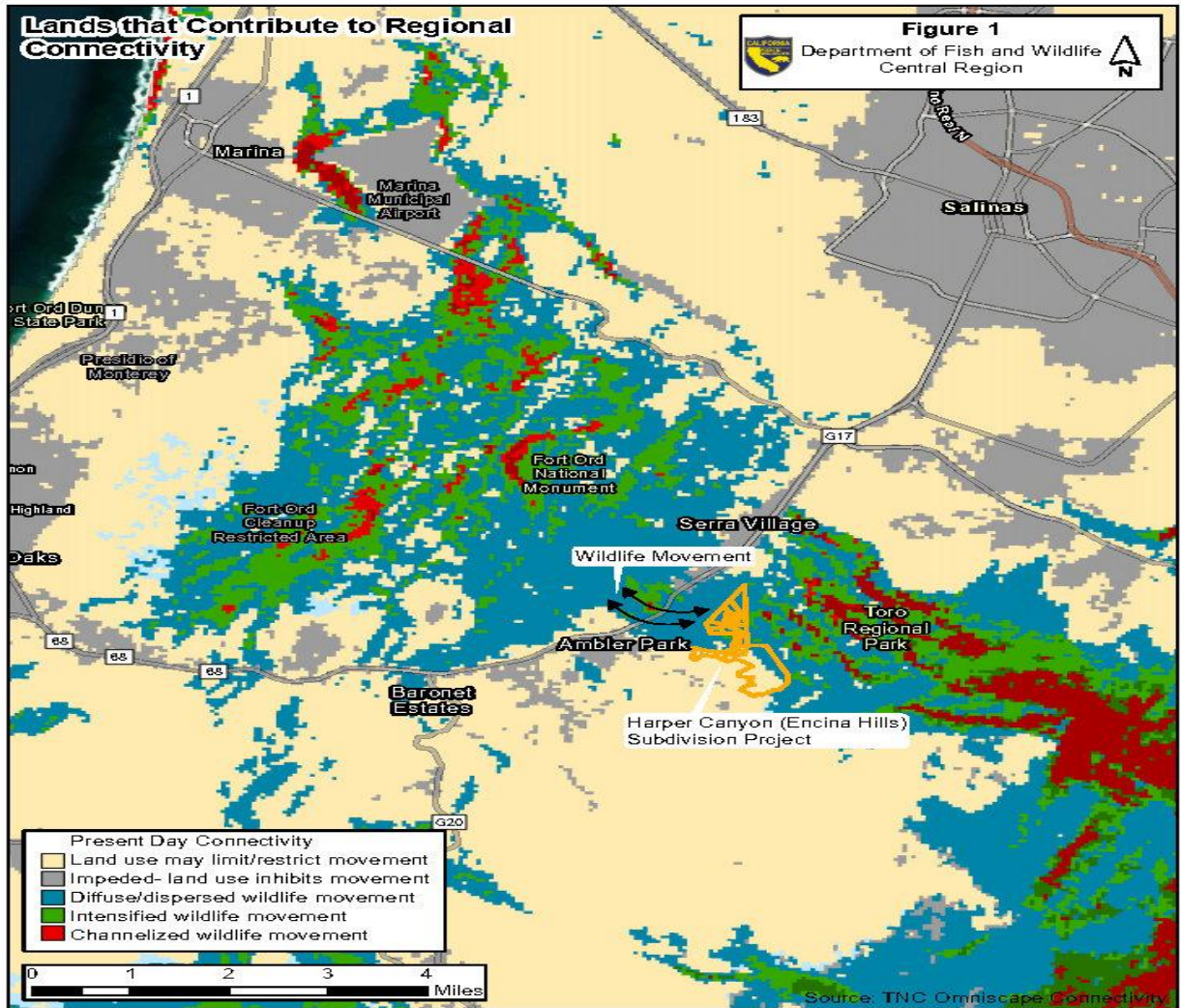
Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 14

ATTACHMENT 1

MODELED WILDLIFE CONNECTIVITY WITHIN THE PROJECT SITE

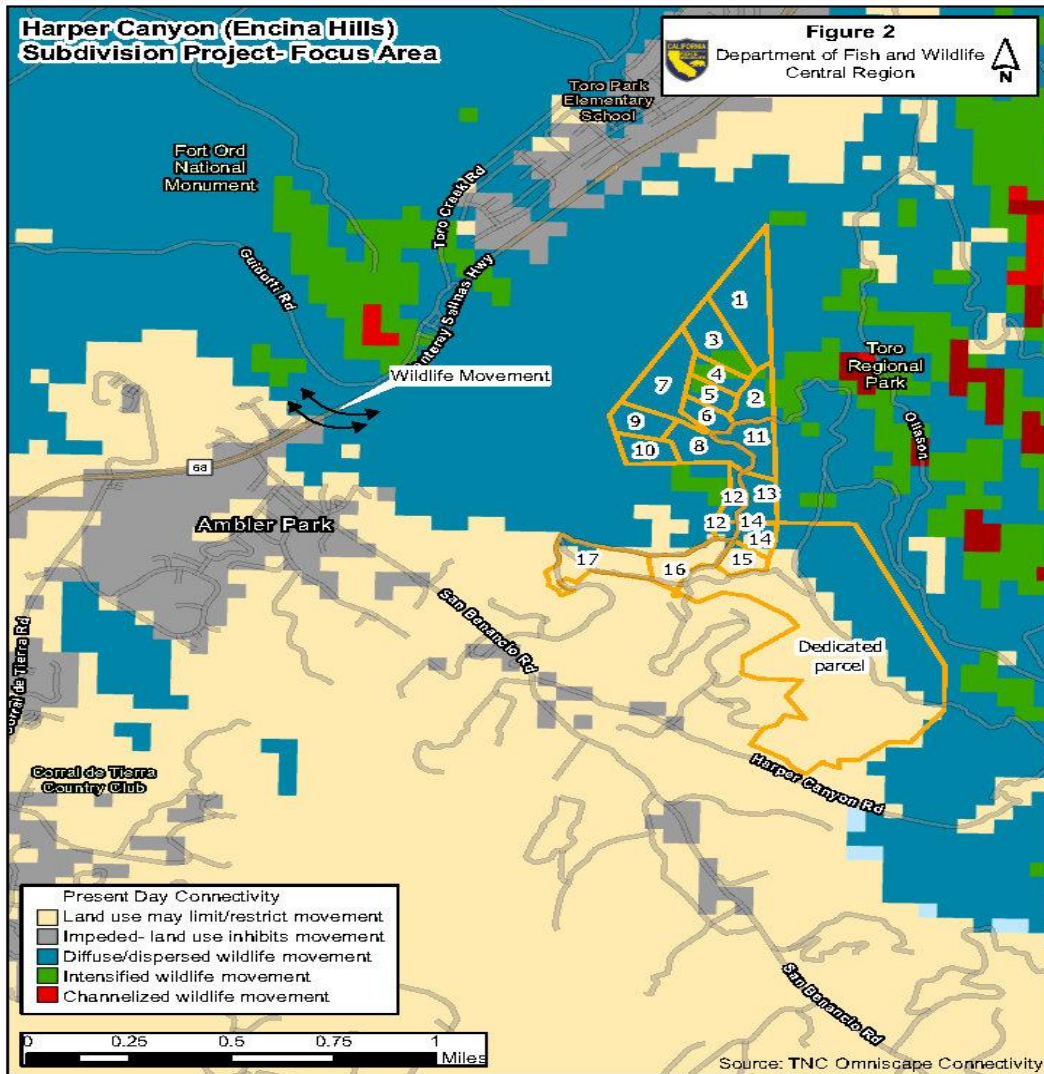
Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 15

FIGURE 1 - The Nature Conservancy (TNC) Omniscape Connectivity Web Map dataset depicting the ability for wildlife to travel through an area via limited, dispersed, intensified, or channelized movement corridors. Diffused/Dispersed movement areas (blue color) are areas with high flow having open space and limited human modification. These areas within the Project site depict that there are currently minimal barriers to wildlife moving through.



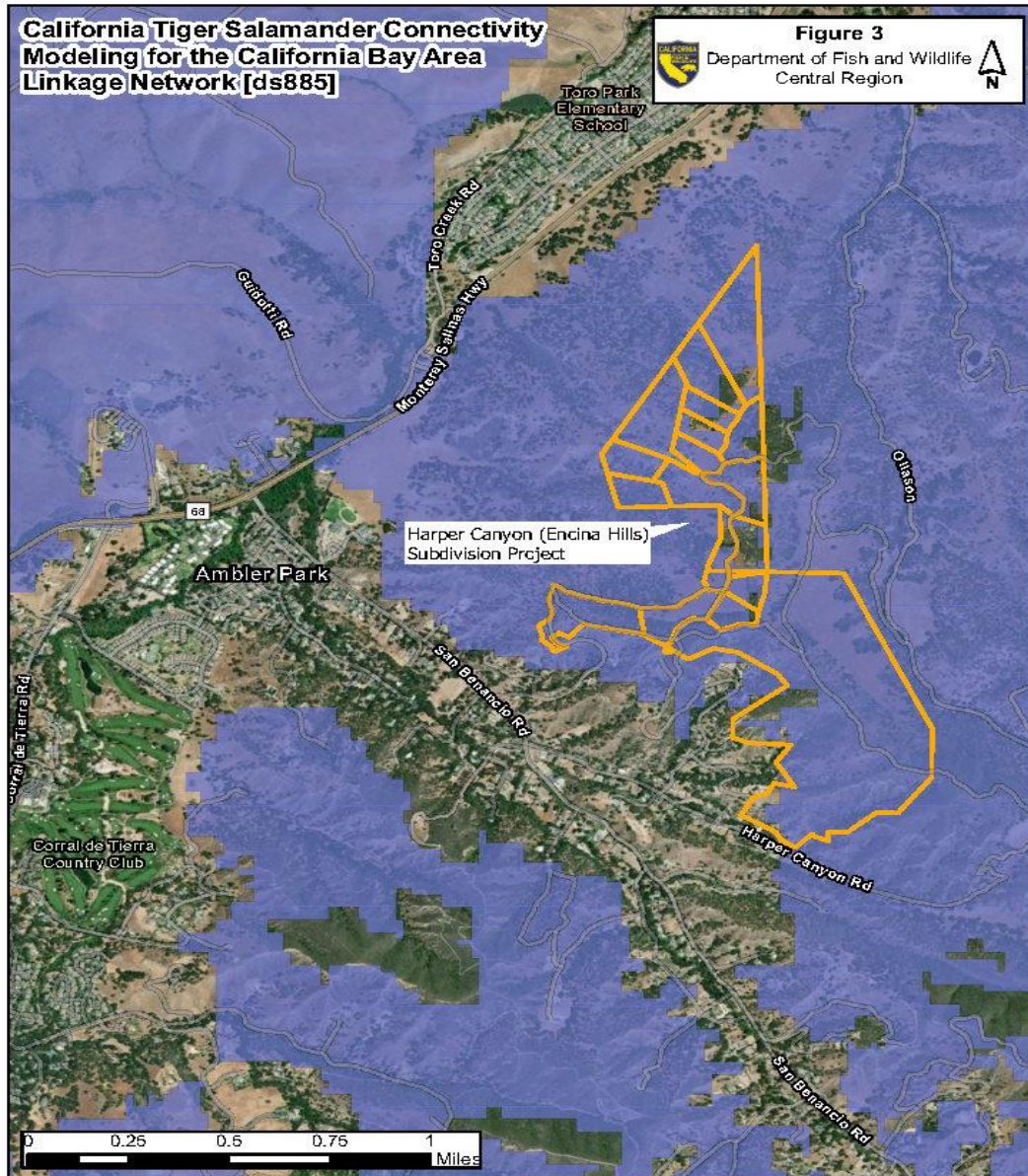
Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 16

FIGURE 2 – The Nature Conservancy (TNC) Omniscape Connectivity Web Map dataset depicting the ability for wildlife to travel within the immediate Project site via limited, dispersed, intensified, or channelized movement corridors. Diffused/Dispersed movement areas (blue color) are areas with high flow having open space and limited human modification. The areas within the Project site depict that there are currently minimal barriers to wildlife moving through.



Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 17

FIGURE 3 – The California Tiger Salamander Connectivity Modeling for the California Bay Area Linkage Network dataset depicting potential core breeding areas and patches of breeding habitat for CTS (blue color). The Project site is located within an area modeled as an essential linkage for CTS between Fort Ord and Toro Park.



Craig Spencer, Acting Director
 County of Monterey Housing & Community Development
 May 29, 2024
 Page 18

ATTACHMENT 2

**RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM
 (MMRP)**

**Project: Harper Canyon (Encina Hills) Subdivision Project (Project)
 Supplemental Draft Environmental Impact Report (SDEIR)
 SCH No.: 2003071157**

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
Mitigation measure: Wildlife Connectivity	
Comment 1: Retaining a minimum linkage width	
Comment 2: Consultation with CDFW	
Mitigation measure: Mountain Lion	
Comment 3: no night work	
Comment 4: avoiding use of rodenticides	
Comment 5: avoidance and take	
Comment 6: Human and mountain lion conflict	
Comment 7: Awareness signage	

Craig Spencer, Acting Director
County of Monterey Housing & Community Development
May 29, 2024
Page 19

Mitigation Measure: California Tiger Salamander (CTS)	
Comment 8: Consultation with CDFW	
Comment 9: Surveys Prior to Project Implementation	
Comment 10: Take Authorization	
Mitigation Measure: Crotch's Bumble Bee and Western Bumble Bee	
Comment 11: Habitat Assessment	
Comment 12: Focused Surveys Prior to Project Implementation	
Comment 13: Avoidance Take Authorization	