



**EMC PLANNING GROUP INC.**  
A LAND USE PLANNING & DESIGN FIRM

301 Lighthouse Avenue Suite C Monterey California 93940  
Tel 831-649-1799 Fax 831-649-8399 www.emcplanning.com

**To:** Charles Pooler, City Planner  
**From:** Richard James, AICP, and Andrea Edwards  
**Cc:** Todd Bodem, City Administrator  
**Date:** May 15, 2018

---

**Re:** South of Tioga Final Environmental Impact Report (Final EIR) Errata  
SCH # 2017061066

---

**Message:**

On May 9, 2018 the City of Sand City published the Final EIR for the South of Tioga project. The Final EIR addressed the presence of federally listed endangered and state-listed threatened Monterey gilia (*Gilia tenuiflora* ssp. *arenaria*) on the project site in response to the April 16, 2018 comment letter received from Dr. Fred Watson. The Final EIR included a map incorporating both the 2017 plant occurrences (data provided by Dr. Watson) and the 2018 plant occurrences mapped closest to proposed impact areas (data collected by EMC Planning Group). EMC Planning Group biologists met Dr. Watson at the site to discuss the special-status plant on April 19, 2018, and returned on April 26, 2018 to map Monterey gilia individuals located closest to proposed impact areas.

As described in the Final EIR, the on-site disturbed coastal dune scrub area proposed for preservation and restoration was expanded to include the four Monterey gilia individuals mapped by EMC Planning Group on April 26, 2018. Mitigation Measure BIO-1 was revised through slight expansion of the 0.9-acre preservation area to avoid direct impacts to all known 2017 and 2018 on-site Monterey gilia locations. Additionally, "due to the minimal potential that in the future, a small number of Monterey gilia plants could shift into the project impact area prior to ground disturbance and/or the Monterey gilia seed bank could be slightly adversely

MEMORANDUM

impacted by long-term habitat enhancement (careful manual iceplant removal) in the on-site preservation area,” Mitigation Measure BIO-1 was revised in the Final EIR to require Incidental Take Permits through coordination with the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife for minimal impacts to a small number of Monterey gilia (less than one percent of the on-site portion of the population).

On May 11, 2018, after the Final EIR was published, Dr. Watson called EMC Planning Group senior biologist Andrea Edwards to inform her that he had recently revisited the project site, and found one additional Monterey gilia individual; he sent Ms. Edwards an email that day containing the plant location, which is shown on the attached map. Dr. Watson sent an additional email later that day with maps of Monterey gilia for the project area per the *Sand City Proposed Habitat Conservation Plan - Draft* prepared in February 1993 by Thomas Reid Associates; this showed that though not observed in 2017 or 2018, Monterey gilia has in the past been observed in small numbers on the project site in disturbed areas both north and south of Afton Avenue. Dr. Watson noted in this email that “the South of Tioga population is unique, robust, crucial, and irreplaceable, and any threat to its viability would be essentially unmitigable off site”.


In response to this information, on May 14, 2018, EMC Planning Group assistant biologist Emily Malkauskas revisited the project site to confirm the location of this single Monterey gilia, which is located within the proposed impact area in a parcel mapped in the EIR as “Disturbed Maritime Chaparral/Coastal Dune Scrub.” The plant is located in a disturbed habitat area, and its flowers were almost closed at the time of this observation. Refer to the attached map.

In conclusion, the newly identified individual Monterey gilia is located on the project site south of Afton Avenue, within the proposed project impact area, and this minimal impact to the species will require to be permitted through Incidental Take Permits obtained prior to ground disturbance from the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife. The City of Sand City is making a good faith effort to fully document project impacts to Monterey gilia and other special-status biological resources, obtain all necessary regulatory agency permits, and require on-site habitat preservation to mitigate for an unavoidable minimal impact to this important endemic species.

# South of Tioga Project

Monterey gilia on-site 2018 location of one individual plant sent by Dr. Fred Watson to EMC Planning Group on May 11, 2018

## Legend

 Monterey gilia (2018)



Google Earth

© 2018 Google

300 ft

