

seacliff buckwheat plants would be planted.

While restoration efforts in other areas of the Monterey Dunes have demonstrated that the revegetation of dunes with buckwheat can be accomplished, it remains unclear whether this proposal will provide productive habitat for the Smith's blue butterfly. Of primary concern is the grading and disturbance of all surrounding native dunes, and the associated impacts to the existing butterfly population resulting from altering the existing topography which currently provides the right combination of sun exposure and shelter from the predominant northwest winds that are favored by this species. Therefore, to reduce these potential impacts, Special Condition 1(h) limits grading to the foredune directly seaward of buildings and only where such grading is designed to replicate natural dune landforms and integrate into the surrounding dunes to the extent feasible. Further, Special Condition 2(d) requires a biological monitor to be present during all grading and construction activities to ensure that dune areas and sensitive species are protected. And finally, Special Condition 2(e) requires pre-construction surveys for sensitive species, consultation with the biological monitor and the USFWS, and implementation of mitigation measures consistent with the HPP and any other state or federal agency requirements. As conditioned, impacts to Smith's blue butterfly, a key feature of the dunes that are protected by the LCP, will be minimized.

#### ***Habitat Protection Plan***

The Commission's senior ecologist, Dr. John Dixon, reviewed the HPP and concluded that, as proposed, it does not provide sufficient detail to ensure that the Plan will be effective in ensuring restoration of the dune area, as required by the LCP (see Exhibit 26). For example, the HPP indicates that the Landscape Plan contains biological objectives, cover goals, seed mixes, and installation recommendations. However the Landscape Plan is conceptual and lacks specificity. The HPP provides general "biological objectives" for each management area as opposed to more specific enforceable success criteria, and there does not appear to be any contingency requirements in the event that the restoration goals are not met. These metrics are essential to successful restoration of the site and are at this time lacking. Accordingly, Special Condition 3 is attached that requires submittal of a revised HPP that includes detailed guidance on plant propagation, planting methods, and irrigation. Performance standards (success criteria) for biodiversity and vegetative cover are required to be provided for each vegetation type (as characterized by a specific plant palette and planting plan and any modifications based on slope and aspect) rather than on management areas. Special Condition 3 further requires regular maintenance and monitoring of the restored dune area, and that cover criteria be assessed based on the analysis of high resolution aerial photographs coupled with on-the-ground observation. Performance standards must be assessed every year for the first five years and then every 10 years henceforth. To ensure that the habitat restoration is carried out consistent with the approved Dune Restoration Plan including over the life of the proposed development, Special Condition 4 requires the applicant to place the entire restored dune area into a dune conservation easement and to offer to dedicate said easement to an acceptable public agency or private association. All future development within the easement area, other than for restoration purposes, public access, resort pathways, and initial foredune grading is prohibited.

Finally, the HPP indicates that more than 23 acres of the site will be restored to native dune habitat – including roughly 5 acres on the development grounds. There are benefits to planting native vegetation in, and around the development grounds, rooftops, gardens, etc., as it helps