



THE LEAGUE
OF WOMEN VOTERS
OF THE MONTEREY PENINSULA

2/20/2004 #7

February 18, 2004

Thom McCue
Monterey County Planning and Inspection Department
2620 First Avenue
Marina, CA 93933

Dear Mr. McCue:

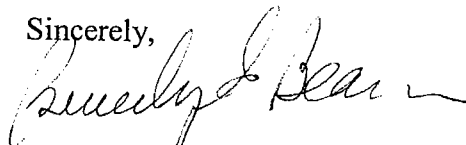
The League of Women Voters of the Monterey Peninsula wishes to submit the following comments on the DEIR for the Pebble Beach Company's Del Monte Forest Preservation and Development Plan:

1. The DEIR does not address the project's inconsistency with the following policies contained in the Natural and Visual Elements of the adopted Local Coastal Plan (LCP) (consistency is required by the Coastal Act):
 - Preservation of the unique forests for their aesthetic value is a concern of both residents and visitors to the area;
 - Preservation of the unusual habitats for their botanical value to the scientific community is of paramount important (this predates our present threat of pitch cancer);
 - Further development in the Del Monte Forest must be responsive to the delicate balance of climate, soils and vegetation which has developed over the centuries; Significant "tree removal" is inappropriate in such areas
 - The natural forested character of the Del Monte Forest shall to the maximum feasible degree be retained;
 - Where LCP objectives conflict, preference should be given to long-term protections of forest resources.
2. The DEIR relies on a mitigation and monitoring program to assure implementation of mitigation measures. Such programs have proven inadequate in the past and seem even more problematic in the future given the severe reduction in County Planning Department staff.
3. In discussion on removal of constraints (See Measure A), the water demand for the project is estimated to be up to 286.8 afy. This water is to be provided from the Pebble Beach Company's "entitlement water" which totals approximately 355 afy. This total was based on the amount of potable water to be saved through the Reclamation Project. However, that savings has not been fully realized and cannot be guaranteed unless and until improvements to the Reclamation Project are completed. In order to fund these improvement, the Company is seeking permission to sell 150 afy to new users. This amount plus the project total would bring water demand to 437 afy, 77 acre feet in excess of the entitlement water. A proposed mitigation measure would address this overage; however, since project water would come from the Carmel River until such time as the Reclamation Project is completed, the FEIR should address the project's interim impact on the Carmel River.
4. The effect of project construction on the residential community is not adequately addressed. For example, the DEIR does not adequately address the impact of construction diesel exhaust on the health of residents living near construction activity.

5. While the economic interests of the Company are acknowledged, no account is taken of potential negative impacts of increased commercialization on residential property values nor of the loss of environmental quality of life through the systematic degradation of the forest. | 5
6. The project includes removal of 130 acres (p. 3.3-22) to 150 acres (summary) of Monterey Pines, approximately 7% of the remaining undeveloped Monterey Pine forest in the Del Monterey Forest and 1.6% of the remaining known undeveloped forests in the Monterey region. The effect of cumulative development on native pine forests on a regional basis would result in a loss of 1,600 acres or 17% of the extant forest in the Monterey region. The DEIR finds that removal of the trees to be significant at the project and cumulative level and mitigation measures would reduce the impacts to less than significant. We think that removal of the native pine forest cannot be mitigated by efforts to retain remaining native stands and by replanting areas with native pines which would take many decades to mature. Further, there is no assurance that the proposed regional forest conservation plan to mitigate cumulative impacts would be implemented. We think that project level and cumulative impacts on the Monterey Pine Forest would be significant even with mitigation. | 6
7. The California Coastal Commission staff has recently recommended measures to more adequately protect the Monterey Pine Forest by restoring its designation as environmentally sensitive habitat and restricting wholesale cutting of the trees in the Del Monte Forest. These recommendations should be addressed in the FEIR. | 7
8. Finally, the League is on record as opposing the decision to finish the hearing process on the Development Plan before submitting Measure A to the Coastal Commission for certification. Since Measure A is the basis of the Development Plan, Measure A should be certified prior to certification of the EIR. | 8

Thank you for the opportunity to review the document.

Sincerely,



Beverly Bean
President