

**DEL MONTE FOREST LAND USE ADVISORY COMMITTEE**  
Forest Lake and Lopez Roads  
Pebble Beach, CA 93953

March 15, 2004

3/16/2004  
#23

Mr. Thom McCue  
Senior Planner  
Planning and Building Inspection Department  
Coastal Office  
2620 1st Avenue  
Marina, CA 93933

Re: Draft Environmental Impact Report, Pebble Beach Project

Dear Mr. McCue:

In the time allotted this committee to review subject report, inevitably our review is incomplete and, perhaps, in some respects superficial, considering the length and depth of the report. The report was received on Thursday, February 5, 2004, and considered at our meeting on March 11, 2004.

The authors of the report are commended for their thorough and definitive treatment of the multiple land use areas addressed. The breadth and scope of issues are extensive and complex. The report is generally clear and precise. The Executive Summary and Project Summary are particularly helpful. Our difficulty with the report lies with its organization and dispersed treatment of specific projects. Individual projects are not set forth as independent packages or subject areas but as specific topics whose implications or impact must be appraised by reference to multiple areas in the report. For example, in the case of the new golf course, the reader is obliged to examine areas elsewhere in the report to assess that undertaking, e.g., land use, traffic, wetlands, the pine forest, etc. Hindsight suggests that the report list each application sequentially in all its implications, rather than requiring the reader to examine descriptions of its impact placed elsewhere in the report. Commendably, however, the report does summarize the impact of the project in various tables, particularly, Table ES and Table 2.0-4. Further, at its beginning, the report addresses, however briefly, contentious issues in its "Areas of Known Controversy."

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There is no index to the report and there is no listed identification of the various areas affected by the EIR. Figure ES-2 does show most of the areas but their exact locations are not clear. It would have been helpful if the area locations were identified with road parameters or some other recognizable description.

2

Is this Project the Final Build-Out? The Committee still asks whether this project represents the “final” build-out of the Pebble Beach Company. Although the County back on September 12, 2002, in a letter to this Committee stated that the project “...proposes final build-out of Company’s lands in the Del Monte Forest.”, to our knowledge the Company has never formally made such a declaration. Concern in this respect lies in Measure A, itself, sponsored by the Company, which states in its preamble “[The purpose of Measure A is] ...to encourage future visitor-serving development adjacent to existing visitor-serving or recreational facilities ...” The preamble then requires “future development” to be consistent with the California Coastal Act and subject to environmental review. Back in 1992, when the Pebble Beach Lot Program was reviewed, the same question was asked. The answer obviously influences decision-making affecting the current project. The applicant reported at the March 11 meeting that it has formally agreed with the DMF Property Owners that this project constitutes a final build-out.

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Application of the Coastal Act. Brief reference appears in the report (Volume II, Appendix, Chapter 3.1, page C-1) to the California Coastal Act (Public Resources Code, Sections 30,000 et seq.) acknowledging the need for the project’s compliance. Reference appears elsewhere to Measure A, the public initiative in general support of the project. Although the Committee cannot and does not expect a legal treatise of the application of the Coastal Act and Measure A and the consistency or lack of it between them, some declaration of compliance and consistency might be helpful to dispel doubt and uncertainty respecting the project. Another helpful item for the reader would be a copy of Measure A attached as a part of the Appendix.

4

Specific Issues. These specific issues merit the concern of the Committee:

1. Forest Reduction. The EIR concludes that mitigation measures will reduce forest reduction to a “less than significant” level. The numbers in support of this conclusion are confusing. The project provides:

- a. direct removal of 99 acres of undeveloped forest;
- b. conversion of 28 acres of undeveloped forest to suburban forest (What is the definition of “suburban forest?”);
- c. non-restoration of 23 acres at the Sawmill site.

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Table 2.0-4 breaks this down in numbers of tree removal, roughly, 9,500 pines and 500 coastal oaks from the golf course and 1,900 pines and 485 oaks from the equestrian center, and significantly lesser numbers from other project areas. These numbers are intimidating; thus the EIR’s assessment of the project’s cumulative impact is questioned. Totals here are 150 acres of impacted forest. In mitigation, the EIR states that 458 acres of forest will be preserved and the forest *in situ* will be retained. This is laudable, of course. But should not mitigation be

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measured on what happens to existing conditions, rather than on conditions that exist had the project not been undertaken? The existing local plan authorizes 800 plus residential units and expanded commercial and recreational facilities. What counts is the impact of the project on existing conditions, i.e., the existing forest, not what could have occurred with some other option. Although the proposed project is substantially reduced in comparison with what the project could have been, is not the determination of impact measured on the reduced project as an independent and separate undertaking?

7 (cont.)

The ultimate questions, here, are: 1) By how many acres (and trees) will the Monterey Pine forest be reduced from *existing* conditions by reason of this project? 2) What conditions mitigate this reduction to a less-than-significant level?

2. SFB Morse Gate. This gate was originally constructed to accommodate visitor traffic to Spanish Bay and to provide a shorter access to Del Monte Forest on northbound Highway 68, bypassing passage through Del Monte Park in Pacific Grove. What restrictions, if any, will be applied to commercial use of this gate, subject to reasonable accommodation of the new equestrian center?

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3. Highway 1 and 68 Intersections. Proposed changes help alleviate traffic problems here but require "positioning" of cars in appropriate lanes prior to reaching the intersection from southbound Highway 1 and southbound Highway 68. This is understandable, perhaps as the only practical solution, but it does little to minimize drivers' confusion at this complex configuration. Further, improvement in egress from the Beverly Manor professional area and the Community Hospital apparently is dependent upon state funding. This means inaction for years to come.

Specifically, cars traveling east on Hwy 68 approaching the PB and Hwy 1 intersection will attempt to follow the right lanes into PB. Would a barrier at the light help this situation? Cars leaving PB to Carmel on Hwy 1 will continue to merge with cars from Hwy 68 headed in same direction. All traffic entering the PB Hwy 1 gate faces a tight turn while making lane changes to accommodate visitor versus resident lanes. Admittedly, this is a difficult area, and no easy solution exists.

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4. Traffic. Increased commercial traffic is inevitable with the expansion of the Lodge and the Spanish Bay Inn and another golf course. Special events at the Equestrian Center generate heavy traffic in trucks and trailers, thus traffic will concentrate on the Sawmill site area inside the Morse Gate. This is helpful. Whether replacement of the existing center with a golf course reduces traffic in this critical area close to the Lodge is questionable.

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5. Bristol Curve Area. Plans apparently are still evolving in this area. The presence of Yadon's piperia plant makes any road changes difficult. If, indeed, the plant is present throughout the "triangle" encompassed by Bristol Curve, Stevenson and

Forest Lake Roads, should not the Stevenson connection with Forest Lake remain or be constructed in close proximity to its present location? Dividing or splitting this sensitive parcel seems unnecessary if a modified intersection at or close to Stevenson and Forest Lake can accommodate golf course traffic. Assurances from the applicant at the meeting on March 11, 2004, suggest this concern can be satisfactorily resolved.

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6. Water Quality. This issue also remains a concern. Assurances are given that water quality will be achieved through certain efforts, but those assurances appear marginal. See Chapter 3.4-27 et seq., and Chapter 3.4-30 et seq. The Best Management Plan (BMP) at Charter 3.4-9 et seq. provides remedial actions to achieve elimination of waste, salt, nitrogen, etc., through runoff, reclamation, and mixing, inter alia. Whether these efforts will improve water quality to an acceptable level is questioned.

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Attached for your review are individual comments from Mrs. Janice O'Brien, a member of the Committee. Your consideration of Mrs. O'Brien's comments and the comments expressed in this letter is appreciated.

Sincerely yours,



Paul De Lay,  
Chair

cc: Scott Hennessy, Director, Planning & Bldg. Inspection Department  
Mark Stillwell, Executive Vice-President, Pebble Beach Company  
Richard Andrews, General Manager, PBCSD  
Committee Membership

enclosure: Comments from Mrs. Janice O'Brien, Member