

3/16/2004
#24

February 19, 2004

Thom McCue, Planner
Monterey County Planning and Building Inspection Department
2620 1st Avenue
Marina, Ca. 99933

Dear Thom :

I wish to submit the following comments on the draft EIR for the PBC Development Plan.

- 1 The EIR is quite explicit that this plan as it stands will have significant impact on the native Monterey Pine Forest (NMPF) and its habitat. It then attempts to mitigate the unmitigable with a series of management plans to be monitored over a period of twenty years. This approach has been an utter failure in the past, as witness Sawmill Gulch and Spanish Bay which is still not in compliance, and is less likely to succeed now when the Planning Department is facing a major reduction in staff. In addition, the EIR does not address the inconsistency of this plan with the policies in the operative LCP. This is required under the Coastal Act.
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- 3 The EIR is based on the assumption that measure A will be certified, but a review of the past three years' correspondence between the County and the Coastal Commission staff does not support this assumption. The cumulative devastation of the NMPF is expressly forbidden in the recent recommendation for updating regulations submitted by the Coastal Commission staff in December of last year.
- 4 Justification for the removal of water and traffic constraints under Measure A is not supported by findings in the EIR.
Water : The water demand for the project is estimated at a potential 286.8 afy. This water is to be supplied from the company's "entitlement water" of approximately 360 afy. The justification for this amount was the presumption of a commensurate savings of potable water due to water reclaimed for the golf courses in Pebble Beach. However, this savings has not been realized and cannot be assured without major improvements to the Reclamation Project process and storage capability. In order to fund these improvements, the Company has proposed selling another 150afy to new demand. If this occurs, the 150afy must be added to the 286.8 to arrive at an estimate of 436.8 afy, 76.8 over the Company's entitlement. Since all of this water will be coming from the Carmel River, it will exacerbate the continuing overdraft of the River and its adverse consequences and must be deemed a significant impact on the water resource.
- 5 Traffic : The road system within the Forest is rural in nature and not conducive to major enlargement. The "improvements" on Hwy. 68 will be of minimal help in coping with the added traffic resulting from the increase in commercial buildout within the Forest. The new lights on Hwy. 68 will merely orchestrate the traffic jam. No mention is made of the traffic increase which will be generated by the future buildout of Community Hospital.

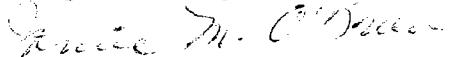
6 | Any discussion of the project's impact on the residential community cannot be confined merely to a construction time frame. The emphasis on expanded commercialism will alter the residential character of the Forest. The systematic degradation of the forest environment will not only diminish the quality of life but could have a negative impact on residential property values as well.

7 | This project will destroy approximately 17,000 trees. It will impact 150 acres, 1.06 of the remaining known developed NMPF. The overall effect of cumulative development on NMPF on a regional basis could result in a loss of 1600 acres or 12% of the extant forest in the Monterey region. Reference is made to other forested areas outside the Forest under Company ownership. It is not clear if the preservation of these areas is being suggested as mitigation for the destruction of forested areas within the Del Monte Forest as a quid pro quo. And no mention is made of making it a requirement.

8 | There is no discussion of the potential climatic impact from the major loss of tree cover, not only in the DMF but on the Peninsula as a whole. The forest canopy protects the Peninsula from the violent coastal winds. It is also the basis of our clement weather patterns which we all enjoy.

9 | Finally, the Del Monte Forest comprises one fifth of the Monterey Peninsula and is its environmental signature. It is not only a community resource of inestimable value, but a national treasure. The popularity of Pebble Beach as a resort is largely dependent on the forest ambience. The EIR must evaluate these public interests against the financial expectations of the Company.

Respectfully,



Janice M. O'Brien
Member of DMFLUAC