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March 19, 2004

3/19/2004

Mr. Thomas A. McCue Senior Planner Planning & Building Inspection Department Monterey County Coastal Office 2620 First Avenue Marina, CA 93933

RE: DEIR: "Del Monte Forest Preservation and Development Plan" – Pebble Beach Co.

Dear Mr. McCue:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for Pebble Beach Company's "Del Monte Forest Preservation and Development Plan." MST has strong concerns that further expansion of residential, recreational and visitor facilities is being considered in one of the few developed areas of Monterey County that still has no public transit service. In that regard, please note the following comments on the plan and its DEIR:

Access to Jobs

MST believes that there is demand for public transit services in the Pebble Beach property. With a total of approximately 1,600 employees, PBC is one of the largest employers on the Monterey Peninsula. As its website proclaims, this world class resort is known for "peerless quality and outstanding service [and whose] employees display a level of professionalism and proficiency unmatched in the industry." Furthermore, many of the positions are full-time with paid medical, dental and vision benefits starting after just 90 days of employment. To deny individuals without a car access to these high quality jobs is unfair and is harmful to the countywide jobs situation and the overall economic vitality of the region. Of the approximately 15 divisions of the PBC listed on their website, 11 currently are looking for employees. Indeed, there are fully 45 job postings, some of which (i.e., "cooks," "bussers," "guest services drivers," "bartenders," etc.) appear to require more than one new employee. Permitting MST buses to serve Pebble Beach would open up employment opportunities to thousands of county residents.

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U.S. Census journey to work data indicate that residents of Carmel-by-the-Sea, Carmel Valley, Marina, Monterey, Pacific Grove and Salinas commute to Pebble Beach to work each day. However, the data reports that no one from the South County area – Gonzales, Greenfield and King City – where unemployment rates, income levels and minority populations are higher, nor from the MST-served communities of Castroville or Prunedale, also home to significant minority communities, are reported to commute to Pebble Beach. The availability of jobs in Pebble Beach without adequate access via public transit raises environmental justice issues that also relate to PBC's civic and social responsibilities as a business and property owner in Monterey County.

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Paratransit, Environmental and Congestion Concerns

MST continues to receive requests for service to Pebble Beach, both for special events as well as for daily service. Additionally, most of the visitor-oriented area of Pebble Beach, including the world-famous Lodge, lies outside of the MST RIDES paratransit service area. This effectively precludes access to the property by people with disabilities who require — but do not own or have access to —a private vehicle with a wheelchair lift. Furthermore, traffic going to and from the property via such crowded routes as Lighthouse Avenue and through the communities of Pacific Grove and Carmel exacerbates air quality and causes congestion. This in turn adversely impacts MST by increasing delays and operating costs on our existing transit lines in these areas.

Transit Service Implementation

As recently as the late 1980's, MST provided charter service to golf tournaments held at Pebble Beach. During the development of Spanish Bay, discussions occurred between Pebble Beach, MST and local political leaders regarding regular transit service to the property. However, this service was never implemented because of resistance from the owners and operators of Pebble Beach. In that regard, MST wholeheartedly supports Monterey County in its requirement of PBC to prepare and implement an alternative transportation plan which includes public transit as indicated in Mitigation Measure F1. However, MST requests that this process begin immediately upon approval of the project plan by the Board of Supervisors so that adequate study and planning can be conducted in advance of the implementation of service.

Additionally, PBC and the County of Monterey should be prepared to participate financially in the provision of this service based upon the fair-share impacts of its existing and this proposed new development. MST would also request that, once service is implemented, PBC enroll in its discount pass program that enables businesses to secure tax incentives for providing employees with public transit passes. As the planning process continues, MST would encourage the project developer to review its "Designing for Transit" handbook (copy enclosed),

which provides schematic drawings and exact roadway geometrics illustrating requirements for bus stops, shelters and other passenger amenities. Experience shows that designing roadways and facilities to accommodate transit beforehand is less expensive than retrofitting once construction is complete.

MST looks forward to working productively with the Pebble Beach Company and Monterey County in finding successful transit solutions that meet the needs of all involved. We believe that the implementation of transit service to the property will provide much needed access to those looking for jobs, for transit dependent individuals – including those with disabilities – who wish to visit this world famous resort, as well as for those customers who choose to ride MST for its convenience and environmental sensitivity. If you have any questions regarding these matters, please contact me or Hunter Harvath, MST's Planning Manager, at your earliest convenience.

Sincerely,

Frank J. Lichtanski General Manager/CEO

Enclosure

Cc:

W. Reichmuth, Transportation Agency for Monterey County MST Director Armenta

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