

Ted R. Hunter  
P.O. Box 1189  
Pebble Beach, CA 93953  
Ph. 831-624-3734 Fax 831-620-1525  
e-mail [trhunter@pebblebeach.com](mailto:trhunter@pebblebeach.com)

MONTEREY COUNTY  
PLANNING & BUILDING  
INSPECTION DEPT

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Thom McCue, Senior Planner  
Monterey County Planning & Bldg. Insp. Dept.  
2620 First Ave.  
Marina, CA 93933

#31

Subject: Draft Environmental Impact Report on Pebble Beach Company's pending Application  
for Major Construction Projects in Del Monte Forest

Dear Thom,

Rich Walter and the Jones & Stokes consultants have produced a very complex document. It appears to be very thorough in addressing many environmental issues involved with the Pebble Beach Company's extensive development plans. However, I feel this Draft Report is inconsistent in many areas and it is very difficult to find all the important information related to each individual application to determine what the full adverse impact will be for each.

I suggest that the Final EIR be improved with a better organization of information with all facts about each of the ten pending applications in one place. It is important to know the specific impacts each individual application (proposed construction project) will have and how that individual project will impact traffic, air quality, noise, the environment, etc. in that particular area of the Forest.

I also found this draft report to be incomplete. I strongly suggest that the Final EIR cover the following items to assist the decision makers in understanding the volume of information and locating facts about a specific pending application. The Final EIR should include:

1. An **Index and Glossary** with definition of terms and acronyms | 1
2. A complete **copy of the Measure "A" Initiative**. The summary on page ES-2 and in Appendix C page C-1 is not sufficient. The document should explain why the Environmental Analysis of Measure "A" is not being made available for the public prior to the first public hearing. It should also indicate when it will be available for the public and how the public will be able to respond to the analysis document. | 2
3. The description on Appendix C page C-2 of the **Del Monte Forest Local Coastal Plan and Land Use Plan** is incomplete. If and when Measure "A" is certified and approved by the County and Coastal Commission these documents **must be amended and approved before the pending applications can be approved**. | 3
4. Extracts from the **California 1976 Coastal Act** that apply to the Del Monte Forest need to be added in the Appendix C page C-1 & 2 | 4
5. A copy of each of the **pending applications dated July 18, 2001** with a complete description of each project. The list of development projects in Chapter 2.0 page 3 is not adequate. | 5

6. **A separation of all environmental facts, impacts and mitigation measures** listed for **each application**. Chapter 4.4 Cumulative Impacts does not breakdown the environmental impacts for each application or project by the Titles listed on page 2.0-3. The readers know the project by the Titles not the Area identification and they want to know the mitigation plans for each project.

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7. **Enforcement** - A requirement/condition that **Monterey County will follow-up and ENFORCE** all conditions placed on these development projects. Currently it seems funds are not available for this important work. The Final EIR must deal with this problem.

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8. Reference to **Enforcing Conditions associated with the Spanish Bay development** that are still pending and should be included in the EIR.

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9. **New Schedule for Construction Starts on each project** -The DEIR Table 3.7-1A and Table 3.7-1B do not clearly indicate which construction projects have priority. **An improved clearer Schedule is required, in addition to the Table, listing a priority sequence for major construction work for each application/project.**

Pages 3.7-11 and 12 indicated "construction of the New Equestrian Center is proposed to begin concurrently with work at the proposed Golf Course". This Chapter also indicates major excavation work will take place for underground garages at Spanish Bay and in the area of The Lodge, however it is not clear when this work will begin and if it is all scheduled to begin at the same time. Table 3.7-1A refers to using Haul Trucks at Spanish bay, the Golf Course and the Equestrian Center during the first three months and at The Lodge area during Months 19 through 21. It is suggested that this Table be amended with a clearer Schedule listing each of the 10 projects with estimated start times and end times in the 42 Month period.

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**If all of this construction work for these projects is in progress at the same time why hasn't the DEIR addressed the significant adverse impact on the residents?**

Chapter 3.7 and the Table **do not make it clear that the Hwy 1 Hill Gate Road Improvement work is the No. 1 Priority Project**. A Condition associated with these development projects should require that this Hwy 1 Hill Gate road improvement **be completed before any other work begins**.

The Final EIR should indicated that the first two important priority projects are:

1. Road Improvements at the Hwy 1 Hill Gate and
2. Construction of a New Equestrian Center

10. Include a reference to the fact that the **Monterey Pine Forest ecosystem is in an Environmental Sensitive Habitat Area (required by the Coastal Act)**. And that the Santa Cruz, San Mateo, and San Luis Obispo General Plans have established this designation for native Monterey Pines. The Final EIR should also discuss the recent California Coastal Commission Staff Periodic Review of the Local Coastal Plan with recommendations on this subject and how the proposed development projects will be affected.

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11. **Final Build-Out** -A requirement/condition that the applicant, PB Co. enter into an agreement with the County and California Coastal Commission stating the these development **Projects represent the Company's FINAL BUILD-OUT** in Del Monte Forest.

**Comments on the Measure "A" Initiative**

*Page 1.0-2 on Measure "A" states: To encourage FUTURE visitor-serving development adjacent to existing visitor-serving or recreational facilities in the Del Monte Forest.* Conditions and a separate Agreements are required to put an end to future commercial development in the Forest.

The Monterey County Policy Makers need to control/stop continued commercial development in the residential community of the Forest and maintain a balance for the tax paying resident property owners.

If Measure "A" is approved by the County and Coastal Commission it would allow an open ended expansion of Visitor Serving units at Spanish Bay, The Lodge and it would permit the expansion of commercial units at the Spyglass Hill complex (Founders Bldg.). The pending applications represent an excessive expansion of Visitor Serving units in the Forest. It is not in the best interest of the residential community to allow an unlimited further expansion of Visitor Serving units.

The following additional important issues associated with the proposed development project need further coverage in the Final EIR:

**Roadway Improvements**

Highway 1/Highway 68/17-Mile Dr. Pages 2.0-11 and 3.7-3.

These sections require additional information on how this road improvement at the Hwy 1 Entrance (Gate) to the Forest and Hwy 68 from CHOMP to the Hwy 1 interchange require coordination with Monterey County, the City of Monterey, CHOMP and Caltrans. What are the problems associated with financing this priority project? And what will be funded by the applicant? The Final EIR should indicate who is responsible for funding which part. Why isn't the need for a replacement of the 17-Mile Drive narrow Bridge near the Hospital been addressed?

Internal Forest Road Changes Pages 2.0-12 and 2.0-13.

The information following "Proposed Golf Course" needs to be expanded to include reference to the problems listed elsewhere in the documents related to the Yadon's Piperia on pages 3.3-37 and 38. **The "mitigation presentation" on page 3.3-37 indicating that Stevenson Drive would not be realigned and that Bristol Curve would be retained as a main arterial road is NOT ACCEPTABLE.**

**The Final EIR needs to covers other alternatives to preserve the Yadon's Piperia and eliminate a significant adverse impact for tax paying property owners on Bristol Curve and Bristol Lane.**

As you know Thom, Mark Stilwell, Exec. V.P. PB Co. and the residents on Bristol Curve/Lane, that would be significantly impacted by the use of Bristol Curve as a main artery, will be meeting, probably several times, to discuss the redesigning of this section of the golf course and an improved plan for extending Stevenson Drive to Forest Lake Rd.

### Monterey Pine Forest and Coast Live Oaks

Executive Summary Pages ES-10, 11 and 12. Summary of Impact and Mitigation Measures Table ES-2 and Attachment C Project Summary Page 45.

The total number of trees to be removed..=..15,391 Monterey Pines and 1,769 Coast Live Oaks should be listed in the Executive Summary on page ES-10 along with reference to acres affected. The Mitigation Measures listed in Table ES-2 page 5 (using areas outside the Forest - Old Capitol Site) and the Resource Management Plans (RMPs) ARE NOT APPROPRIATE.

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The removal of 9,582 Monterey Pines and 501 Coast Live Oaks = Total of 10,083 trees just for the proposed Golf Course will completely change the forest environment for the residential property in this area of the Forest. Why hasn't the DEIR isolated this problem with a statement indicating that this will create a significant adverse impact that cannot be mitigated for this residential neighborhood.? Why hasn't the fact that the proposed developments throughout the Forest will remove the Forest canopy and produce a potential climatic impact for the Del Monte Forest and the whole Peninsula area been identified in the DEIR? These facts should be covered in the Final EIR.

### Water

Executive Summary Page ES-16 and 17.

The Final EIR should discuss the problems on the water supply required for all of the development projects if the Phase II improvements to the CAWD/PBSCD Recycle Water Project and the proposed plan to sell entitled water do not produce the projected results.

New restriction on withdrawing water from the Carmel River should also be discussed.

Does the DEIR cover the need for a Special Condition on these applications indicating that **potable water can not be used for the new golf course?** I can't find this statement in Chapter 2.0-5 or in Chapter 3.4-3 on the golf course. Please include this requirement in the Final EIR.

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Why doesn't the DEIR address the fact that all of the required water will increase the continuing overdraft of the Carmel River and that this will create a significant adverse impact that can not be mitigated.?

### New Equestrian Center & Aug. 11, 1995 Title 20 Ordinance

This major project is mentioned in several Chapters of the DEIR, however, it is very difficult to find all of the facts about how this use of land, with recorded easements dedicating it for open space, can become a **commercial Equestrian Center without significant adverse impacts.**

Here are important questions:

1. Why aren't copies of the County and California Coastal Commission recorded Conservation Easement provided in the DEIR? The Final EIR needs to provide the decision makers with details on why the Easements were required, and when they were recorded.

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2. Why doesn't the document mention the Title 20 Ordinance that prohibits RV vehicles and camping in the Forest? Special events that last several days at the Equestrian Center usually include parked RV's and camping by the participants. The Final EIR should address this problem.

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3. Why aren't the Wetlands in this area better defined?

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4. What is the definition of "Temporary Events"? 19
5. Why hasn't the fact that participants will truck their horses to the Ocean Area been addressed? 20
6. What is the accurate total acreage of the proposed Equestrian Center? Several figures are used....40, 41, 43 and 45. 21
7. Who will be responsible for the environmental education of participants that use the Forest trails and the Center at Special Events? 22
8. How many events will be held each year? What is the expected number of participants and spectators and each event? 23
9. Each equestrian event involves set-up time, event days, take down and clean up time. What is the estimated total number of days for the average event? How will traffic and and noise from loud speakers affect the residents in the area? 24  
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## **Traffic**

### **Internal Road Changes 3.7-4**

Spanish Bay - The proposed additions of Conference Rooms, Hotel Rooms and an Underground Garage at Spanish Bay will increase the traffic in and out of this Resort Complex. The road improvements proposed at the entrance,- 17-Mile Dr. and Congress Road,- are not adequate. Why hasn't the DEIR addressed the adverse impact the added resort traffic will have on the residents of the 83 Townhomes in the area? This impact will be very significant at times when an emergency ambulance is required for a residents. The plans provide for only one single entrance from 17-Mile Drive to both the Resort Complex and the Townhomes. Visitors to the Inn will follow a new separate road once inside the main entrance, however the EIR needs to address the traffic problem for residents at the single road main entrance. The problem can be mitigated by building a new separate entrance to the Townhomes that would not be used by visitors to the Inn or other resort facilities. Does the DEIR mentioned traffic problems for emergency ambulance or fire truck vehicles? 26  
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Golf Course & 11 Cottage Units - The road changes illustrated in Fig. 3.7-3 and Construction Truck Routing Fig. 3.7-4 are not adequate. When will both of these road maps be updated to clearly show where the final locations of the new extension of Stevenson Drive to Forest Lake Road will be?

Will Construction Trucks use Bristol Curve for work on the proposed Golf Course? Or will Bristol Curve be removed and a new extension of Stevenson Drive be completed before Construction Trucks begin traveling in this area? Why don't the two road maps (Fig. 3.7-3 and Fig. 3.7-4) illustrate the same road system in this area? 28

The required road changes, due to the Yadon's Piperia, and the required redesigned sections of the proposed golf course due to the Piperia and Wetlands need to be covered in an addendum to the DEIR. The public should be given time to respond to these changes and redesigned plans. It would be inappropriate for these changes to be incorporated in the final EIR without public comment.

**Public Services**

The Impact section PSU-A2 and the Mitigation Measure section PSU-A-2 in the DEIR that indicate the Pebble Beach Company should be obligated to develop a funding plan to insure that police service is available within the Del Monte Forest is not appropriate. This is a Monterey County obligation that should be covered in the Final EIR.

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In Chapter 3.5 -Public Services and Utilities, the Emergency Access and Wildland Fire Hazard sections do not adequately include a Forest Wide Fire Defense Plan and Emergency Routes for all sections of the Forest. The proposed major expansion of the resort complexes with a new location for the Equestrian Center and another golf course will involve many areas of the Forest. Where is a Emergency Plan for visitors and residents to follow in the event of a major fire or any other event that requires an evacuation of sections or all of the Forest?

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Your consideration of these comments and suggestions with a reply will be appreciated.

Sincerely,

  
Ted R. Hunter