

CMcCarthy response to PBC EIR

TO: Thomas McCue, Senior Planner, Monterey County Planning Dept.

FROM: Carol McCarthy

DATE: March 22, 2004

RE: Response to Draft Environmental Impact Report (DEIR) for Pebble Beach's Company's Del Monte Forest Preservation and Development Plan

Dear Mr. McCue,

Thank you for the opportunity to respond to the DEIR. My comments are provided below.

Should you have any questions, please feel free to email me (carol_mccarthy@ctb.com) or phone (831-393-7333).

PROJECT DESCRIPTION\

pg2.0-3&4, ln38-40 & ln1-24: Talks about the dedication of preservation areas but neglects to mention that some, like Pescadero Canyon, have been repeatedly rededicated and would not be a result of this new PB Co development plan. Also, somewhere it needs to be stated in paragraph text that, as a result of Measure A (if certified), that the EC site acreage would be upzoned from OF to OR in order to allow intense recreational development. This is an important point that never was brought to the public's attention by the media during the Measure A campaign and the government should take the responsibility to see that it appears in the DEIR and its other documentation on the PBC plan.

pg2.0-6, ln 22, 25-32 ; 2.0-7, ln 15-17: "Temporary events," what does that entail as far as other PB special events go? Not defined in EIR

LAND USE

pg. 3.1-7, The bulleted Equestrian Center statement says the immediate adjacent surrounding area is HHNA, but neglects to note that part of the Pygmy Forest is an adjacent area the top of the hill, right across the trail from the site. Also Gowen Cypress extends to adjacent area at the top left of the site.

pg3.1-7, ln 36-44, States that the County currently considers the new EC as compatible use in recognition of Measure A approval. I think not! Why is such a presumption being made in the DEIR? Measure A has not been certified by the CCC and the equestrian center may not be approved in its current form. This statement should be deleted from the DEIR!

P3.1-7, ln 40: States the EC would provide a recreational transition between existing residential development and the HHNA. What about Coastal Commission's goal to preserve the health of forests by maintaining contiguous tracts instead of allowing intrusive developments such as a large, high-intensity EC to divide the environmentally sensitive Morse Preserve, HHNA including Gowen Cypress and Pygmy Forest?

pg3.1-26 Under "Measure A," please add a bulleted statement with the number of acres that would be upzoned from OF (RC) to OR for the proposed new EC.

6

Vol2, App D, D-14, #13 – EC is marked as consistent with conditioned or mitigated as per deed restrictions, yet Land Use chapter talks about deed restrictions being inconsistent, What are we talking about here as far as being consistent? #13 invites voluntary easements while Pebble Beach wants to remove the conservation easements at EC. Please clarify this double-talk.

7

BIOLOGICAL RESOURCES

pg3.3-14, pg3.3-16,ln 8-15 Mitigation Measure BIO-A5: Weed-free feed mitigation recommended. Define how would this mitigation be enforced.

8

pg3.3-17, ln 17-37 mentions Sawmill Gulch "foregone restoration" mitigations are additional avoidance, minimization, restoration, and enhancement to less-than significant levels. How will this be realized by developing a high-intensity EC there. Also what is definition of "foregone" restoration?? That term can be interpreted different ways. "Foregone" means having gone or been completed previously; departed; past (American Heritage Dictionary of the English Language). Which definition of foregone is being referred to in context with restoration. The restoration certainly wasn't "completed previously." After complaints that PBC was not restoring the area as a condition of Spanish Bay sand mining, PBC finally planted some trees but did nothing to restoring the soil and nurture the trees. Please clarify.

9

3.3-19, ln42-44 &3.3-20, ln1-4 correctly states the permit intent of permit was to reforest the site and integrate it into the HHNA but complete reforestation will not occur with this project. What are the mitigations to uphold this very important oversight by PB?

10

3.3-28, ln 25-27. Contradictory to DEIR, planned buildings in upper sawmill are closer than 100 feet to wetland.

11

pg3.3-59, ln8-25: Mentions effects of human use but does not include an analysis of the biological effects of large crowds at EC special events, people roaming the woods, trailers, horses, etc. (producing a county fairgrounds-like impact on the HHNA, wetlands, and other sensitive surrounding areas).

12

pp3.3-68, ln6-29. I was glad to see that the Monterey Pygmy Forest was mentioned. But what about impacts on the section of Pygmy Forest that is right across the trail at the upper end of the planned EC? No mapping of Pygmy Forest is provided to indicate its proximity to the EC and its location in HHNA. Also, "Notice of Availability of a Draft Recovery Plan for Five Plants from Monterey County, CA, for Review and Comment," US Environmental Protection Agency, Federal Register Environmental Document, Vol 67, Number 92, May 13, 2002 needs to be cited in that section so the importance of the pygmy forest does not go unnoticed.

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Grubs in the horse feces not addressed. At existing EC there are normally few flies except after special events. Do flies from grubs deposited by international horses have an impact on the ecology in a sensitive forest environment?	14
Nothing addressed about a plan for the monitoring of all these mitigations. Who, what, where, when will enforce mitigations?? SBDR App H-3;ln12-17 admits report doesn't specify what the controls are. Same for SBDR App H-3, ln18-21	15
The impact that a complete removal of trees to accommodate a driving range vs the effect of spot removal for building development needs to be addressed. DEIR doesn't address the significant impact on "clear-cutting" an entire swath of undisturbed forest trees to accommodate a driving range at SBDR. Goes against Coastal Commission goal that large, contiguous areas of forest remain preserved.	16
3.3-58, ln 15-21 – In SBDR leave a few dead trees for mitigation for loss of pallid bat habitat? Please provide substantiation for this mitigation.	17
3.3-63, ln 14-16 – Driving range - Replanting will occur around the driving range. How does this make up for the swath that will be cleared for the >2000 trees for the driving range itself?	18
Wetland buffer recognized for SBDR site but seasonal wetlands occurring inside the planned driving range corridor ignored. One cannot traverse there in the winter. County wetland mapping should be questioned.	19
Table 3.3-8 lists no wetland for actual driving range area. Table 3.3-8 lists no Riparian LF for EC, yet it lies right in a riparian corridor on previous project maps.	20
App D-10: Incorporating environmental education to all trail users and special events at EC. How? Study groups? Patrols? Please define the education plan and how it will ensure enforcement of rules (weed-free feed, trail use, etc.)	21
Where in the DEIR is the criteria defined for determining that mitigations will turn a significant impact to one that is less than significant? Each mitigation given in the EIR should define the criteria and/or cross-reference an appendix or chapter in the EIR document that is readily accessible to the reviewer.	22
No explanation found of the impacts of perimeter security fencing shown in Figs 2.0-10 (EC) and 2.0-14. Am EIR on the impacts on wildlife corridor needs to be addressed.	
Vol 2, AppD, D-15, ln14- For the SBDR, minimum removal of vegetation and disturbance is not marked.	23

HYDROLOGY & WATER QUALITY

3.4-18, ln8-29. Horse waste could degrade water quality downstream, pathogenic organisms. Could be significant, mitigation off-site transport of wastes and storm water runoff will adversely impact receiving waters and pacific ocean. Mitigation is monitoring. Shouldn't prevention via regular cleanup of EC and HHNA trails be added as a mitigation.

24

TRANSPORTATION & CIRCULATION

pg 3.7-2 "Parking accommodations" for EC special events not mentioned.

25

Temporary event area usage and mitigations not well defined. Also nothing about RV usage allowed at EC? Where do the people with RVs camp and what facilities are there for their sewage waste and gray water?

26

3.7-6;ln29-34. If appox 300-400 vehicles/day (plus 60 horse trailers) for special events why only 166 total parking spaces + 100 temp trailer on Fig 2.0-11? Where will the rest park? Another inconsistency is the statement, "Plans for new facility will include 126 spaces," yet and Fig 2.0-11 shows 150 spaces and 16 spaces shown in Fig 2.0-10)

27

3.7-7,ln 23-24: "Special event" needs to be defined in context with this statement that the lower area would be used for special event parking. Is that special event parking just for EC events or do they plan to use it for "other" special events? Please define.

28

Transportation. 3.7-24&25 Mitigation for Skyline Forest & Beverly Manor intersections at Rt 68 is traffic lights? That will back up through traffic even more. Include consequence of this mitigation in DEIR.

29

The closing of the Presidio has had an reflexive impact on Highway 68 .When Lighthouse Avenue in New Monterey has a traffic jam, drivers drive up David Ave or Prescott and jam Highway 68. This has caused some real traffic problems that I have personally witnessed, especially at the rush hours. This situation should be addressed in the DEIR.

30

MISCELLANEOUS

Inconsistencies in figures for acreages and tree counts throughout the DEIR. Recommend a thorough edit.

31

This does not pertain to the DEIR but is related documentation that I wish to comment on...The "Coastal Development Permit Supplemental Application" says the upper EC area will accommodate Residential use. Is that allowed under LUP, LCP, Measure A zoning for Open Space Recreational?

32

Poor organization of DEIR document.

- I found it extremely difficult to track project-specific impacts across so many chapters since the impacts are addressed for groups of projects instead of by individual project. This plan is too large and complex for any one person to comprehend and complete review in its existing format. It gives the appearance that the developer does not want the governing parties and public to clearly see what is being reported on.
- Poor cross-references, e.g. in App D, on pg D-11 Policy 8 is mentioned. I searched for Policy 8 but never did find it and learn what it referred to. Clear citations should be provided and hyperlinked for each cross-reference.
- Other problems in the DEIR PDFs sold to the public were that the text could not be copied & pasted, making it impossible to provide quotes in comments. The master TOC had no hyperlinks and there was no index or bookmarks. These are all easy enhancements that should have been done to make this comment period more efficient and easier for all concerned.