



CITY OF PACIFIC GROVE
COMMUNITY DEVELOPMENT DEPARTMENT

300 FOREST AVENUE
PACIFIC GROVE, CALIFORNIA 93950
TELEPHONE (831) 648-3190
FAX (831) 648-3184

BUILDING INSPECTION
(831) 648-3183
HOUSING PROGRAMS
(831) 648-3190
PLANNING/ZONING
(831) 648-3190

3/22/2004
#52

March 21, 2004

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

Dear Mr. McCue:

Attached are comments regarding the Environmental Impact Report for the Pebble Beach Company's Del Monte Forest Preservation and Development Plan. The City of Pacific Grove has commented and expressed its concerns on the environmental impact reports for the Pebble Beach Lot Program and Alternative 2 done in the 1990's. We appreciate the opportunity to provide the following comments on the current proposal.

GENERAL COMMENTS

The current project has eliminated many of the impacts noted in earlier comments provided by Pacific Grove in the 1990's and is preferred to those previously proposed projects. However, there remain potential impacts to the City of Pacific Grove that merit further environmental consideration and review.

TRAFFIC AND CIRCULATION

Although the DEIR provides an analysis of the project's impacts on roadway systems within and entrances to Pebble Beach, it does not adequately address impacts on the level of service on streets and intersections in Pacific Grove. Internal roadways within the Del Monte Forest currently operate at Level of Service (LOS) C or better but the proposed project will result in additional traffic on Pacific Grove streets. The DEIR accepts the roadway system within the Del Monte Forest as unique and claims that the internal roadway system is adequate. It concludes that impacts to the internal forest road system will be minimal, but this is because much of the additional traffic may be funneled onto the nearest external roadway, thereby moving the impact from within the Forest to Highway 68 and neighboring Pacific Grove roadways. Increased traffic associated with the proposed development may interfere with the goals of the Transportation Element of the City of Pacific Grove General Plan, specifically to "Protect residential areas from high-volume, high-speed traffic and its impacts." Roadways in the City of Pacific Grove that already serve as access roadways for Del Monte Forest traffic and will feel the impact of increased traffic resulting from development include 17 Mile Drive (in Pacific Grove), Asilomar Ave., Sunset Dr., Crocker Ave., and Grove Acre Ave. Other roadways that will feel increased impact include Congress Ave., David Ave., Forest Ave., Patterson Lane, and Presidio Blvd. Traffic studies should be expanded to determine the level of increased impact on these roadways resulting from the proposed development.

To adequately serve the proposed development without increasing traffic impacts to Highway 68, mitigations should include development of an internal arterial roadway system to carry a substantial amount of traffic between all reaches of the Del Monte Forest and the Highway 1 Gate, including improvements to the Highway 1 Gate.

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The impact of the proposed development on the safety and efficiency of neighboring roadways has not been adequately addressed. Specific attention should be given to the impacts special events at the equestrian center may have on the ability of Highway 68 to serve as an evacuation route from Pacific Grove. A proposed mitigation measure notes coordination between the applicant and Cal Trans to add "conditional" service at the Highway 68/S.F.B. Morse Gate signalized intersection. This mitigation should include measures that make it clear the addition of this "conditional" service will not have a negative impact the ability of Highway 68 to serve as an evacuation route for Pacific Grove.

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Traffic mitigations that could be provided by public transportation to or within the Del Monte Forest have not fully addressed. Mitigations such as these should be looked to for reducing the increase in traffic within and outside of the Del Monte Forest.

4

Event parking at the proposed equestrian center site should be limited to no more than 3-4 events per year to minimize impacts to the Highway 68/S.F.B. Morse Drive intersection and the Del Monte Park area. Event parking at the equestrian center should be limited to only events that are occurring at the equestrian center.

5

VEGETATION AND WILDLIFE

Buildout of the proposed project will result in the loss of hundreds of acres of Monterey pine forest and maritime chaparral habitats as well as thousands of Monterey pine trees and understory vegetation. The proposed project impacts the City of Pacific Grove with the relocation and development of the equestrian center in the vicinity of the Del Monte Park area of Pacific Grove. Consideration has not been given within the DEIR as to how these increased impacts will be mitigated. Mitigations providing specific tree replacement counts or percentages along with minimum size and performance standards need to be developed. A permanent open space "buffer zone" created by deed restrictions on as-yet undeveloped parcels adjacent to the City of Pacific Grove need to be developed.

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In light of the importance of the Monterey pine in the ecology of Pacific Grove, and noting the effects of pine pitch canker, all potential impacts of the proposed pine removal on the viability of the Monterey pine forest and the gene pool must be thoroughly identified and studied before any project is approved that would cause further fragmentation of Monterey pine forests and endangerment to the Monterey pine species.

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The trails and roads among the forest provide Pacific Grove and Peninsula residents and visitors numerous and diverse recreational opportunities. They are utilized by bird watchers, hikers, joggers, school children, seniors, and other nature-loving residents and visitors. The impact of the proposed tree removal on these activities needs evaluation.

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AESTHETICS

Although aesthetic impacts to the City of Pacific Grove appear to be minor, additional visual simulations from locations in the City of Pacific Grove towards the proposed developments are needed in order to fully evaluate and address viewshed and aesthetic impacts.

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NEW LOCATION OF EQUESTRIAN CENTER

This location consists of two easements that were thought by many to be "scenic" easements. It has been explained that they are both scenic and recreational easements and would allow for

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development of an equestrian center. No consideration has been given to the impact of the development of these easements on the Del Monte Park area of the City of Pacific Grove, especially for the proposed temporary uses, such as parking, stables, and equestrian rings. Up to now these areas have been used only passively for walking, hiking and horseback riding and the proposed equestrian center site would introduce greater levels of activity than presently exist. The temporary uses on the lower half of the equestrian center need further evaluation of their potential for impacts. Issues that should be evaluated include specific event land use compatibility, noise, odor, lighting, dust generation, and drainage.

10 (cont.)

The site of the proposed temporary use areas are an existing mitigation for the Spanish Bay Resort project that was to have been reforested with Monterey pine trees. Replacement mitigations should be considered, including but not limited to, creating deed restrictions or dedicating additional permanent open space to fulfill the intent of the existing mitigation to preserve the Monterey pine forest.

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Consideration should also be given to creating deed restrictions or dedicating into permanent open space all the undeveloped land between Samuel F. B. Morse Drive and Congress Avenue and the city limits. Should this proposed development impact existing trails, alternate trails should be developed to connect the Del Monte Park area with the rest of the Pebble Beach trails system.

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PACIFIC GROVE SERVICES

The proposed project includes new residential and visitor serving units. Residents and visitors to Pebble Beach use some of the services offered by the City of Pacific Grove. The DEIR should include an analysis of the use and impacts to services such as library, museum, and recreation. Mitigations to minimize any identified negative impacts or provide support for these services need to be developed and implemented prior to finals on the building permits for any of the proposed projects.

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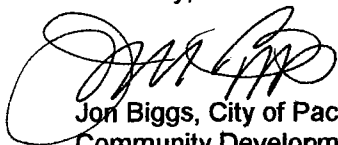
FINAL COMMENTS

We look forward to continued coordination and cooperation with the Monterey County in the review of this project. Further information regarding the project and its environmental review can be sent to my attention at the following address:

Jon Biggs, Community Development Director
City of Pacific Grove, Community Development Department
300 Forest Avenue
Pacific Grove, CA 93950

Please contact me if you need additional information. I can be reached by phone at (831) 648-3190.

Sincerely,



Jon Biggs, City of Pacific Grove,
Community Development Director

C: City Council
City Manager
Planning Commission