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File No. 00368.011

March 22, 2004

3/22/2004
#69

Thom McCue, Senior Planner
Monterey County Planning and Building Inspection Dept
2620 1st Avenue
Marina, CA 93933

Dear Thom:

Enclosed please find comments to the draft EIR on behalf of our client Pebble Beach Company. If you have any questions, please do not hesitate to call me.

Sincerely,

LOMBARDO & GILLES, PLC



Derinda L. Messenger

cc: Alan Williams
Michael Waxer
Mark Stilwell
Cheryl Burrell

Re: Del Monte Forest Preservation and Development Plan – Applicant’s Comments on DEIR

Executive Summary (ES)

General Comment: The ES should be consistent with the DEIR chapters. Any changes to DEIR chapters should be reflected accordingly in the ES. To the extent ES and DEIR chapters are inconsistent, DEIR chapters should control.

1

Page ES-8 Lines 26-28

CNPS is a private environmental advocacy organization. No procedural or substantive due process applies to CNPS decisions.

2

Page ES-15 Line 32

minimum width of 30’ should be corrected to 25’ consistent with Mitigation Measure BID-D5-1.

Page ES-16 Line 15

“such that is” should be corrected to “such that it is”

E

Page ES-22 Line 18

“se discussion” should be “see discussion”

Chapter 1 – Introduction

Page 1.0-5 Line 38

“3.6 miles” should be changed to “2.4 miles” [See revised Trail Map P-7.]

3

Chapter 2 – Project Description

Table 2.0-1 following page 2.0-1

Area K conservation area is APN 008-021-009; Area K tentative map areas are APN’s 008-022-031,032; Open space parcel listed should be removed; it is a duplicate of Area J open space 008-561-020.

Page 2.0-3 Line 34

“3.6 miles” should be changed to “2.4 miles” [See revised Trail Map P-7]

E

Page 2.0-8 Line 35

“301 space surface parking lot” should be changed to “2 surface parking lots with 204 spaces at the driving range and 97 spaces at the golf teaching facility”

Page 2.0-9 Line 8-16

Description of units is incorrect. Change to: 5- 2-bedroom units and 7- 3-bedroom units in four buildings.

Page 2.0-13 Line 40

Change to "project would add 2.4 miles of trails, for a total of 31.4 miles".
[See revised Trail Map P-7.]

E

Page 2.0-15 Line 34

New bullet: Area K - Install approximately 500 LF of 4" sewer line northerly along Stevenson Drive to an existing 8" main.

4

Page 2.0-17 Lines 22-24

This text should include reference to applicant's proposal for management of preservation and conservation areas.

Table 2.03 following Page 2.0-17

Corporation Yard Preservation Area is listed as 6.9 acres in Table 2.0-3 and 6.5 acres in Table 3.3-1 following Page 3.3-18.

Table 2.0-4 following Page 2.0-20

Under The Lodge at Pebble Beach, the Coast Live Oak numbers are missing, but they are included in the Total Column. [See Table 3.3-6 following Page 3-3-62]

Page 2.0-5 Lines 18-19

One unisex public restroom is proposed.

Page 2.0-8 Lines 12-13

Correct to read: "...to the existing golf clubhouse would add 1,800 sf of locker space and a children's pool would be added."

E

Figure 2.0-12

Annotate "Area B – Preservation Area" and "Area C – Conservation Area".

Figure 2.0-26

Reference to "PQR conservation area" should be "PQR preservation area."

Figure 2.0-27

Annotate "Employee Housing Site".

Figure 2.0-27

The conservation line needs to be corrected slightly to exclude area where employee units are proposed. See Figure 2.0-28 employee units located in the N.E. section of the site.

Figure 2.0-32

Correct Figure 2.0-32 to be consistent with revised trail map P-7 by deleting new trail along Lopez and Congress roads. This trail addition is an error picked up from an old map and is unnecessary given the trails in Areas F-2 and F-3.

5

Chapter 3.1 – Land Use

Page 3.1-4 Line 14

Please note that the County has certified that applicant owns 41 legal lots of record, so applicant is proposing to develop fewer lots than legally exist today. Any additional lots beyond applicant's proposal would be extinguished, including the two lots at the Collins property. In terms of environmental impacts, this reduction is beneficial.

6

Page 3.1-5 Line 8

Change to: "trails would be established in the preservation area. *Only 1300± If of new PQR trails will be built, all others will be on existing fire roads and designated as trails.*"

7

Page 3.1-14 Line 10

Last sentence should continue "and to the northwest in the Del Monte Forest".

Page 3.1-17 Lines 19-20

The sentence should read: "Measure A would designate the proposed residential areas LDR/1 (4 lots) and LDR/2 (3 lots) respectively, and remove the resource constraints overlay."

E

Page 3.1-18

Areas G, H, I-1, J and L: *Measure A would designate these preservation areas as OF.*

Page 3.1-26 Line 25

Please note that, in addition to the County-wide vote, 68% of the voters within the Del Monte Forest supported Measure A. These two votes evidence strong community support for the project.

8

Table 3.1-2 following page 3.1-26

Under PQR, add "LDR/1".

Chapter 3.2 – Geology, Seismicity and Soils

Page 3.2-3 Line 5

Change "Table 2.0-6" to "Table 2.0-4" [See Page 2.0-21]

E

Table 3.2.5 The Lodge at Pebble Beach, 3rd paragraph, 1st line

"loose saturates subsurface zone" should read "loose saturated subsurface zone".

Table 3.2.5 Corporation Yard Employee Housing, 2nd paragraph, 2nd line

"endure" should read "ensure".

Page 3.2-7 Line 28

"endure" should be "ensure".

E

Page 3.2-7 Lines 3-10

We suggest as an alternative that appropriate building envelopes be imposed that would accomplish the same purpose as this mitigation measure.

9

Page 3.2-8 Line 11

Delete the word "pan" at the end of this line.

Page 3.2-13 Line 27

Under ACTIVE FAULTS, the second fault should be the "Sargent Fault", not the "Argent Fault".

E

Page 3.2-16 Line 16

The word "strongly" at the end of this line should be changed to "slightly" based on the slope gradients noted in the following parentheses.

10

Page 3.2-17 Line 21

The comma at the end of the line should be replaced with a period

Page 3.2-17 Line 24

Delete the word "an" at the beginning of the line.

Page 3.2-17 Line 32

Add a comma between the words "metal" and "plastic"

E

Page 3.2-17 Line 37

Add the word 'find' between the words "did not" and "evidence" to read "did not find evidence".

Page 3.2-17 Line 45

Change the word "on" to "in".

Chapter 3.3 – Biological Resources

Page 3.3-1 Line 11

Change the word "in" to "is".

Page 3.3-3 Line 26

Change "3.6 miles" to "2.4 miles" [See revised Trail Map P-7]

Page 3.3-3 Lines 30 and 31

Change "Many" to "Most" so the sentence reads: "Most of these new trail segments are planned along existing fire roads." [See revised Trail Map P-7]

Page 3.3-4 Line 8

The EIR should also note that additional post-project mitigation measures and guidelines are provided in: Watershed Hydrology Report, Pebble Beach, Monterey County, California – Phase II Results Report: July 2003 (Balance Hydrologics 2003).

E

Page 3.3-5 Lines 24-40

We question the need to rely on the development and adoption of a regional conservation plan to determine the certainty of future conservation of the resource. Incorporating this “need” into the logic of the significance determination is inappropriate. Existing County policies for approving projects that affect Monterey pine result in preservation (and now ecological management) of more than 75% of the resource on each site, most of which is contiguous with other pine forest reserve areas. What will a regional conservation plan accomplish that the County is not already doing through its existing land use planning and environmental review process? We do not believe that this construct and the associated 5% “interim cap” on Monterey pine forest loss provide a reasonable basis for the establishment of mitigation thresholds for the DMF/PDP.

11

Our biological consultants question the validity of the 5% loss figure as the threshold for a finding of significant cumulative impacts. Given the extensive amount of Monterey Pine Forest that has been and will be preserved, prior recommendations by the California Department of Fish & Game for a 3:1 or at most 4:1 mitigation ratio, and the no significant impact findings of the Final EIR for the applicant’s prior project, we believe the appropriate cumulative impact threshold should be no more than 20%. Additionally, given the extensive forest management and land dedications proposed by the applicant, we believe a forest conservation plan is unnecessary to ensure survival of the species.

Page 3.3-7 Line 27

Seacliff buckwheat (which does occur) is not ESHA at Pebble Beach and the text should not imply that it is. This is misleading to the reader and the decision maker.

12

Page 3.3-7 Line 28

Add comma after (Eriogonum parviflovum)

E

Page 3.3-7 Impact BIO-A1 Line 31

Project development will not result in removal of coastal dune habitat and will correct an existing disturbance problem in the dunes by “directing (pedestrian and equestrian) traffic” through the considered placement of signs, boardwalks and barriers at key locations as part of the proposed project.

13

Page 3.3-8 Line 12

33.49 acres, should be 33.17 per map and consistency. [See Page 3.3-57, Line 10]

E

Page 3.3-9 Line 15

The dunes report proposed measures intended to fully avoid and mitigate impacts to the existing remnant dune and special-status species in the area.

14

Page 3.3-9 Mitigation Measure BIO A1-1 Line 24

The measures recommended here are consistent with measures recommended in the dunes report.

15

Page 3.3-9 Lines 30-38

The golf trail should be designed to accommodate electric golf cart use by guests. This access will not only be required for disabled golfers under the American with Disabilities Act, but is also appropriate for other users given the minimal impacts electric golf cars would have on adjacent areas. Additionally, the requirement to elevate the path is unreasonable and unnecessary. A golf cart and pedestrian-suitable boardwalk through this area, using existing trails to the extent feasible, and designed to minimize any impacts on sensitive plants, would have no significant impacts on this resource. Even if any impacts occurred, the proposed restoration of the surrounding dunes habitat would provide more than ample mitigation.

16

Page 3.3-10 Lines 6-8

We suggest deleting the specific reference to a 42" high fence and allowing fencing, landscaping, or other appropriate barriers designed to reduce intrusion into the area as approved by the Monterey County Director of Planning and Building Inspection.

17

Page 3.3-10 Lines 12-14

Same comment as Page 3.3-10, Lines 6-8, above.

Pages 3.3-12 and -13 Lines 45-46 and 1-19

The ecological values attributed to the natural seasonal pond in Drainage I are not supported by the Wetland Determination prepared by Ecosynthesis. That report states that the pond meets the technical definition of ESHA because it is a scour pool, distinguished by its depth and long-duration water retention. However, its biological values "would be expected to be much less significant than those of other features that receive less or no deeper groundwater." The report goes on to state that "The hydrologic (and consequently the ecological) characteristics of the pond are likely to be less subject to degradation by site alterations, than would be the case if it were primarily supported by surface water." In addition, the reference to use of the pond by CRLF should be qualified; most investigators (including the USFWS representative) familiar with the conditions in the area concur that the pond is an ecological "sink" for the frog. Salinities are too high to sustain frogs or other aquatic life. The impact assessment and mitigation requirements associated with this pond and drainage should be reconsidered in this context.

18

The proposed fairway and buffer clearing are downstream of the seasonal plunge pool. Maintenance of water quality and temperature is more a factor of the water flowing into the plunge pool and the maintenance of a buffer along the upstream portion is more critical. The proposed project restores the natural wetland connection above the plunge pool and maintains a suitable density of trees along this drainage to maintain water quality of the feature. Large trees are less important in affecting shading and the use of lower growing shrubs should be allowed as a substitute for the 40 ft prohibition of clearing. As noted in the DEIR, the plunge pool experiences high levels of salinity and therefore has limited habitat value for amphibians in the summer months. For those reasons, we would request that downstream clearing from the pond be allowed within twenty-five (25) feet.

Page 3.3-13 Line 20

The designated building envelope for Lot 1 in Area F-3 is outside of the Bishop pine/Gowen cypress area. All areas outside of the building envelope should be subject to a condition that will

19

preclude disturbance, including understory clearing, in those areas. The assumption that all habitat on each lot will be impacted by proposed residential development is based on observations of older residential areas in the forest that have not been subjected to current County scenic easement policies.

Page 3.3-15 Line 3 -41

Referenced memo and attached map could not be located. Lines probably meant to be deleted.

E

Page 3.3-15-17, Mitigation Measure BIO-A5

We concur with the comments of the DMFPO and Pebble Beach Riding and Trails Association on Mitigation Measure BIO-A5.

20

Page 3.3-17 Line 34-44

Impact BIO-B1 states that “undeveloped forest” will be removed, converted to suburban forest, or impacted by fragmentation and other indirect impacts. There is no discussion or mention that a large proportion of the forest classified as “undeveloped” is actually already suburban, fragmented, or otherwise impacted by roads, utilities, and other facilities. [See Final EIR from prior Pebble Beach Company project]

21

Page 3.3-18 Line 31

The basis for estimating pine forest removal on residential lots was modified “based on observations of existing developed suburban lots in Pebble Beach....” The assumption that most of the habitat on each lot will be impacted by proposed residential development is based on observations of older residential areas in the forest that have not been subjected to current County conditions. Areas outside of designated building envelopes will be subject to conditions that will preclude disturbance, including understory clearing, in those areas.

22

Page 3.3-19 Lines 22-29

The proposed golf course site cannot reasonably be considered “relatively intact as a forest patch.” The area is fragmented by major roads, the existing equestrian center, the Spyglass quarry, numerous fire roads and trails, the existing Pebble Beach Driving Range, and Cypress Point and Spyglass Hill Golf Courses. [See The Forest Report (Zander 2002) and the FEIR on the prior Pebble Beach Company project]

23

Page 3-19 Line 29

Delete the word “to”.

Table 3.3-1 following Page 3.3-18

Table 2.0-3 and Table 3.3-1 differ on Corporation Yard Preservation Area by a small amount (.4 acres). Please note that the columns for “Removed” “Forest Conversion”, and “Total in Proposed Dedication Areas” add up to less than the 679.5 acres of total forest area because 94 acres of forest are proposed to remain in development areas. [See Table 3.3-3.]

E

Page 3.3-20 Line 20

Change “no adequately preserve of forest” to “not adequately preserve forest”.

Page 3.3-20 Pages 37-45 Residential Area I-2

This area is already a fragmented strip of forest yet the text concludes that, as a result of development, "The remaining narrower strip of undeveloped forest would be less resistant to impacts from activities associated with the surrounding development and golf course than the present wider strip." We disagree that this distinction is valid.

24

Page 3.3-22 Line 8

Change "130 acres" to "127 acres". [See table 3.3-2.]

E

Page 3.3-22 Lines 17-18

We question the statement that the proposed project "would not retain the natural forested character in the Del Monte Forest to the maximum extent feasible consistent with allowable development". The existing Del Monte Forest Land Use Plan allows development of up to 891 homes on applicant's property. If that level of development was believed to retain the natural forested character of the Del Monte Forest at the time of LUP certification, certainly the proposed project, which greatly reduces the allowable level of development, meets that standard.

25

Page 3.3-23 Line 13

Change "133 acres" to "134 acres". [See table 3.3-3.]

E

Table 3.3-3 following Page 3.3-24

Under "Proposed Retention" in the "Notes" column, we could find neither Appendix E-3 nor the reference table. Additionally, applicant should receive credit for prior dedications (approximately 200 acres) of Monterey pine forest in the Huckleberry Hill Natural Area. This dedication was required as pre-mitigation for all future development under the Del Monte Forest LUP, to be triggered by the first project proposed by Pebble Beach Company.

26

Page 3.3-25 Lines 26-33 and 39-41; Page 3.3-26, Lines 1-12

Rather than overly restrict the development of single family homes on the residential lots, we chose to cluster all residential development in in-fill areas that are adjacent to existing development and infrastructure. We also chose to place the best Monterey pine forest habitat in open space conservation areas as additional mitigation, beyond the HHNA, for both recreational and residential development. We believe the proposed building envelopes, combined with the proposed negative easements on residential lots outside of the building envelopes, are too restrictive. We would suggest that building envelopes be a minimum of 0.50 acres and a maximum of 0.75 acres dependent on site conditions, and that all areas outside of building envelopes be subject to a county condition at time of approval of residential construction that limits the use of such areas to native landscaping.

27

Page 3.3-26 Lines 13-43

The 15 acre area restoration at the Proposed Golf Course needs to be implemented and managed consistent with such area's use as part of the golf course. Rather than a negative easement, conditions of project approval should be adopted specifying that the area should be restored with native habitat but managed as part of the golf course.

28

Page 3.3-26 Line 23

Preservation Area J is APN 008-561-020, not APN 008-022-035. APN 008-022-035 is an existing residential lot.

E

Page 3.3-28 Lines 10-16

The proposed golf course design will avoid grading in all wetland areas. The reference to "Hole 8" should be changed to "Hole 10." Hole 8 has no potential wetlands impacts.

29

Page 3.3-30 Lines 11 and 18

The reference to "Hole 8" should be changed to "Hole 10".

30

Page 3.3-30 Lines 17-18

Some of the golf pathways that are planned will utilize existing equestrian trails that cross wetlands. While these features have been determined to be "wetlands" based on the Coastal Commission staff's broad definition of wetlands, they do not support vegetation. A boardwalk style bridge could be placed over these trails and still maintain hydrology between the wetlands on either side. Given the length of the crossing, and the nature of the wetland construction of a "clear span" bridge at this location is neither practical nor necessary.

31

Page 3.3-31 to 3.3-41 (Impact BIO-D1 Yadon's Piperia)

We agree with the ultimate conclusion that impacts to Yadon's piperia can be mitigated to a level of insignificance. However, we also believe the proposed impacts to Yadon's piperia are overstated, and that the proposed mitigations go beyond what is necessary to mitigate any significant impacts.

The potential loss of piperia plants is overestimated. It includes plants that will be within areas adjacent to fairways and areas where there will be selective clearing. There is existing evidence that piperia survives in these habitats and the EIR should not speculate to the contrary. There is a thriving population of over 350 plants in a narrow strip of forest between the 18th fairway and Bird Rock Road at the Monterey Peninsula Country Club that was only recently discovered. We believe that impacts to Yadon's piperia in the proposed golf course area can be mitigated to less than significant through a combination of active preservation and monitoring in preserve areas, well-considered avoidance measures prior to and during golf course construction, salvage and relocation of plants that cannot be avoided, and operational restrictions on golf course management and maintenance activities in those remaining forested areas surrounding the golf course after it is constructed. Approximately 19.82 acres and approximately 6,100 plants of Yadon's piperia will be preserved in the golf course area.

32

This conclusion is further supported by the Final EIR on Pebble Beach Company's prior project, in which far greater impacts to Yadon's piperia, with much less extensive mitigation proposed, were found to be mitigated to a level of insignificance [see FEIR pages 12-46 to 12-48]. Additionally, the U.S. Fish & Wildlife Service concluded in its Draft Recovery Plan that the retention of more than 39,000 plants within four large population centers would likely be sufficient to ensure the long-term survival of the species. This threshold would be exceeded by the project mitigation proposed by applicant combined with prior dedications of Yadon's piperia habitat by applicant and others. Additional mitigation in the form of the TEAM Plan should be viewed in this context, and considered supplemental mitigation that could further reduce impacts, rather than being necessary to mitigate impacts below significance.

Finally, we support the removal of Bristol Curve and the realignment of Stevenson Road, as originally proposed by us, and as supported by the DMFPO organization and others. The minimal impacts on Yadon's piperia habitat from this realignment are outweighed by the benefits in terms of traffic safety and noise reduction for local residents.

Table 3.3-4 following Page 3.3-32

Conservation Area K=.74 ac Piperia total and preserved; Area F-3 Hooker's Manzanita preserved should be 8.1 ac (16.8-8.7= 8.1 ac).

E

Page 3.3-33 Line 18

The occurrence of Yadon's piperia at the proposed golf course location is one of several documented throughout appropriate habitat in the Del Monte Forest.

33

Page 3.3-33 Line 24

Subsequent to the recommendations in the final recovery report prepared for DFG (1996), Pebble Beach Company and the Department of Fish and Game reached agreement on appropriate mitigation for the loss of Yadon's piperia that would have resulted from the RA2 project (Hunter 1999). Mitigation acceptable to CDFG included initial preservation of a minimum of 72 percent of the known population of Yadon's piperia in the forest and phased residential development of Areas G, H and I-1 only if a transplanting program in other areas was successful. The DMF/PDP preserves over 75% of the Yadon's piperia in the forest and has eliminated all development in Areas G, H and I-1, setting them aside as permanent natural open space. Thus the mitigation for Yadon's piperia previously specified by CDFG will be realized through implementation of the DMF/PDP.

34

Page 3.3-35 Line 9

We do not believe that construction, landscaping, or indirect effects would eventually remove the entire population within proposed lot areas.

35

Page 3.3-35 Line 29

The preservation percentage does not account for all of the piperia plants within the DMF that will be unaffected by the project – 45,000. Over 80% of the piperia in the DMF will remain unaffected by the project.

36

Page 3.3-36 Line 32

The occurrence of Yadon's piperia in the proposed golf course is already fragmented by major roads, fire roads and trails yet it remains viable. Other occurrences of Yadon's piperia throughout the forest suggest that smaller areas are not more difficult to manage nor are they more vulnerable to extirpation. The areas surrounding the golf course will be on PBC property and will be managed to minimize the effects of surrounding land use practices that could potentially be detrimental to the taxa such as the spread of non-native exotics.

37

Page 3.3-37 Mitigation Measure BIO-D1-1

The golf course has been designed with maximum avoidance of sensitive resources, including piperia, in mind. The level of mapping accuracy (i.e. approximate locations) for piperia in the golf course area does not provide an adequate basis for redesign that would substantially reduce the impact on the plant. Nor does the nature of piperia growth and colonization remain static over time. We do not believe that redesign would further reduce the impact on the plant. Rather, we believe that impacts to Yadon's piperia in the proposed golf course area can be mitigated to a less than significant level through a combination of active preservation and monitoring in preserve areas, well-considered avoidance measures prior to and during golf course construction, salvage and relocation of plants that cannot be avoided, and operational restrictions on golf course management and maintenance activities in those remaining forested areas surrounding the golf course after it is constructed.

38

Page 3.3-37 Mitigation Measure BIO-D1-2

Mitigation for Yadon's piperia previously specified by CDFG will be realized through implementation of the DMF/PDP. Over 80% of the piperia in the DMF will remain unaffected by the project. There is no justification that the project will affect potential recovery of the species.

39

Page 3.3-40 Line 1-7

Temporary protective fencing during tournament play (if any) seems appropriate, where necessary, but permanent fencing is unnecessary given the evidence that Yadon's piperia populations flourish next to the existing unfenced golf courses in the Del Monte Forest. We suggest revising this mitigation to require temporary fencing during major tournaments, where necessary to protect Yadon's piperia from significant disruption.

40

Page 3.3-41 Impact BIO-D2

The project development envelope will avoid all ESHA with Gowen Cypress and Bishop Pine.

41

Page 3.3-44 Lines 10-12

The location of the Pacific Grove clover has been affected for many years by ongoing activities at the existing equestrian center. The 1996 count is not an accurate population number at present, and could not be found in subsequent years. The mitigation measure should include a new assessment of the extent and presence of Pacific Grove clover and the management program commensurate with the current population. [Source: WRA; Zander]

42

Page 3.3-45 Line 13

Please note that CNPS is a private environmental advocacy group whose decisions are subject to neither procedural nor substantive due process safeguards.

43

Page 3.3-46 Line 42 – 3.3-47 Line 1

Please note that CNPS is a private environmental advocacy group whose decisions are subject to neither procedural nor substantive due process safeguards.

44

Page 3.3-47 Line 39-40

Please note that CNPS is a private environmental advocacy group whose decisions are subject to neither procedural nor substantive due process safeguards.

45

Page 3.3-48 Line 13

Please note that CNPS is a private environmental advocacy group whose decisions are subject to neither procedural nor substantive due process safeguards.

46

Page 3.3-51 Lines 10-11

The section should note that the "Drake Pool" is the result of culverted road and equestrian drainage that has created a scour pool immediately under a culvert adjacent to Drake Road.

E

Page 3.3-52 Lines 37-38

See comment to Pages 3.3-12 – 13 regarding overstory clearance.

47

Page 3.3-54 Lines 3-4

CRLF breeding habitat requirement should say: "**Maximum** ponded water depth.... 2 to 3 feet **during the wet season**, with water present through July." Otherwise, the criteria that has been suggested would result in water present year-round and promote non-native amphibians. [WRA]

Page 3.3-54 Lines 20-27

Please note that, in addition to the protocol level surveys, which found no Smith-blue butterflies, no Smith's blue butterflies have ever been reported in the Del Monte Forest.

Page 3.3-56 Line 21

Change "33.49" to "33.17" per map and consistency. [See 3.3-57 Line 18]

Page 3.3-69 Line 25

Change to: "A total of 10.5 acres of wetlands occur within the project area: 5.9 acres within development site boundaries and 4.6 acres within proposed preservation areas". [See *Table 3.3-8 below*]

Page 3.3-69 Line 38

Freshwater marshes are also located in several of the proposed preservation and conservation areas, containing 1.37 acres.

Table 3.3-8 following Page 3.3-69

Revise table using Table E-5a DEIR Volume II as follows:

Conservation Area C = 0.81ac Freshwater
 Preservation Area J = 0.20ac Freshwater (not Seasonal)
 Conservation Area K = 0.35ac Freshwater (not Seasonal)
 Preservation Area PQR = 1.73ac Seasonal

Page 3.3-69 and E-10 Lines 35-24

Only a portion of the 1.14 acre wetland in Sawmill site is marsh, the rest is seasonal wetland.

Page 3.3-70 Line 14

The sentence, "Additional seasonal wetlands occur on the proposed preservation areas", is out of place and should be moved to the end of the paragraph as the next sentence refers to the nature of the seasonal wetlands in the development areas, not in the preservation areas. Also, note that the preservation areas contain 3.24 acres of seasonal wetlands.

Table 3.3-10 following Page 3.3-74:

Table needs to be corrected; numbers are not in correct locations for each area identified. [See *Table 3.3-4*]

Chapter 3.4 – Hydrology and Water QualityPage 3.4-1

The Balance Hydrologics Phase II Report (2003) is not listed in the introduction. However it is referenced in Chapter 7.0 References.

Page 3.4-3 Lines 15-16

Interceptor drains would be used to minimize changes in flow to wetlands, not just to minimize changes in additional runoff.

Page 3.4-3 Lines 20-22

Stormwater drainage systems would be designed to meet Monterey County stormwater runoff development standards (i.e., discharge from the site is no greater than 10-year pre-development peak discharge).

Page 3.4-5 Line 2

The north drainage drains in a radial pattern out from the raised Spyglass Pit (Balance Hydrologics 2003). A portion drains to Spyglass Hill and a portion drains to Cypress Point.

Page 3.4-5 Line 9

According to the Phase II Report (Table 17), the required detention in Subwatershed 1 is 0.22 acre-feet (Balance Hydrologics 2003).

E

Page 3.4-5 Line 15

The wetland buffer that receives water from the wetland detention basin in Subwatershed 2 discharges to the wetland area before discharge to the off-site storm drain system at Cypress Point.

Page 3.4-5 Line 16

According to the Phase II Report (Table 17), the required detention in Subwatershed 2 is 0.52 acre-feet (Balance Hydrologics, 2003).

Page 3.4-5 Line 33

The required detention in Subwatershed 4 is 0.70 acre-feet (Balance Hydrologics, 2003).

Page 3.4-6 Line 3

There are two proposed detention basins on-site. Overflow from the easternmost basin will discharge to a bioswale prior to release to the wetland area. Overflow from the westernmost basin will flow overland to the outlet culvert.

Page 3.4-7 Line 18

See Preliminary drainage report, WWD, page 6 and page 13 (basin #2).

Page 3.4-9 Line 23

Change "rationale" to "rational"

Page 3.4-12 Lines 27-30:

The differences in post-project peak runoff estimates between the Balance Hydrologics study and the WWD report can be explained by evaluating the assumptions underlying each of the studies. The WWD study considered the entire site as draining in one direction, whereas, the Balance study looked at individual subwatersheds. Post-project peak flows will be less than pre-project flows in some subwatershed and greater in others. Where post-project peak flows are greater, detention basins (or similar features) will be constructed to reduce peak flows consistent with Monterey County recommendations.

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Page 3.4-13 Line 6

Specific detention area volumes for each subwatershed are provided in the Balance Hydrologics Phase II Report (Table 17). The detention volumes were calculated to meet Monterey County guidelines which call for detention of the difference between the peak 100-year post-development volume and the peak 10-year pre-development volume. The County guidelines are intended to prevent increased runoff following project construction thus protecting downstream storm drain facilities; therefore, **Mitigation Measure HWQ-B1-1** should not be necessary.

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Page 3.4-14 Line 27

Revise this line to include a forward-slash between grease and sediment since they are separate devices. "...oil and grease/sediment traps...."

E

Page 3.4-16 Line 22; Page 3.4-30 Lines 11, 12, 14

Correct spelling is "triclopyr." Triclopyr has not been detected since the fall of 2000. This pesticide is highly used for residential purposes for woody and broadleaf control. No water quality criteria have even been established for triclopyr, as it is considered relatively non-toxic to wildlife.

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Page 3.4-25 Line 36

The entirety of the north drainage does not drain to Spyglass Hill. A portion drains to Cypress Point.

Page 3.4-29 Lines 5-6

These lines should be revised as follows: "However, nitrate values of 1 to 1.5 mg/L (as nitrogen) and Total Kjeldahl Nitrogen (ammonia and organic nitrogen) values of 11 to 12 mg/L have been measured in adjacent surface drainages."

E

Chapter 3.5 – Public Services and Utilities

Page 3.5-3 Lines 14-16

Change sentence to read: "existing trail segments and create ten new trail segments resulting in an additional 2.4 miles of trails, for a total of 31.4 miles. *Trails are not necessarily newly constructed, most will use existing fire roads.*"

Page 3.5-6 Lines 30-38

The maximum increase in visitors would likely be less than 900, as follows:

- 173 hotel rooms at 100% occupancy by 2 persons = 346 (conservative)
- 33 new lots minus 2 existing Collins lots times plus 60 employee units = 91, 91 units times 3.14 persons per home = 286.
- Estimated number of employees equals 144 (see Page 3.5-17 Line 10)
- 346 + 282 + 144 = 772 persons assuming 100% occupancy of all new hotel rooms by 2 persons/room and that new golf course, driving range, and meeting rooms are used

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overwhelmingly by Pebble beach Resort guests as historically occurs. Allowing for a 10% usage factor by non-guests, the total population might increase by 77 persons to a total of 844. This number is considered extremely conservative because traditionally occupancy is 80% with 1.5 persons per room.

Page 3.5-19 Line 30

Change to "3.6" to "2.4 miles of trails." [See revised trail map P-7]

E

Pages 3.5-6 to -7 Lines 27 – 40 and 1-38 (Impact and Mitigation Measures PSU-A2)

We disagree that this project will have a significant negative impact on the provision of Sheriff's (or other County) services. Currently, Pebble Beach Company pays the following taxes annually:

* Transient Occupancy:	\$6.8 Million
* Property:	\$6.5 Million
* Sales:	<u>\$5.0 Million</u>
TOTAL	\$18.3 Million

Monterey County receives all of the \$6.8 Million in annual TOT and a substantial amount of the annual property and sales taxes.

Additionally, the 2,850 residential lots in the Del Monte Forest generate a minimum of an additional \$20 Million a year in property taxes.

In exchange for this enormous tax contribution, the County currently provides no patrol services to the Del Monte Forest, according to the Sheriff's office. Additionally, the County provides no road, drainage, or park maintenance service in the Del Monte Forest. All of these services are provided by Pebble Beach Company at its cost. Pebble Beach Company also maintains the security gates, patrol, and dispatch in the Del Monte Forest.

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Additionally, with construction of the development proposed by the project, the Pebble Beach Company expects to pay increased annual taxes (in today's dollars) as follows:

* Transient Occupancy:	\$2.6 Million
* Property:	\$2 Million (excluding taxes on home sites)
* Sales:	<u>\$1.4 Million</u>
TOTAL	\$6 Million

Monterey County will receive all of the \$2.6 Million in increased TOT plus a substantial amount of the increased property and sales taxes. Additionally, the 33 proposed residential lots will likely generate at least another \$1 Million/year in property taxes. Pebble Beach Company's payment of existing taxes of \$18.3 Million, our proposed payment of future taxes of another \$6 Million, plus the residential property owners payment of future taxes of another \$1 Million, for a total of \$25.3 Million in taxes, should be more than adequate to fund one additional Sheriff here, if necessary. Given the level of service currently provided and the incremental service that might be provided, the project will obviously have a significant positive impact on the County Sheriff's Department as well as all other County and other public services provided to the Del Monte Forest or its residents.

Finally, the Final EIR for Pebble Beach Company's prior project included no such mitigation, even though the number of expected new residences would have been higher, with a corresponding increase in population.

Table 3.5-1 on Page 3.5-11

Residential Areas includes a footnote (5) reference but there is no footnote (5). Please delete reference.

Chapter 3.6 0 Aesthetics

Page 3.6-17 Line 32

Figures listed are incorrect. Should read "Figures 2.0-10 and 2.0-11."

Page 3.6-18 Line 22

Figures listed are incorrect. Should read Figures 2.0-12 and 2.0-13. No elevations are shown.

Page 3.6-18 Line 46

1,424 Monterey Pines and 558 Coast live Oaks [See Table 3.3-6.]

Page 3.6-19 Line 33

Figures listed are incorrect. Should read Figures 2.0-16 through 2.0-21.

Page 3.6-19 Line 43

Change to: "underground parking garage and about 23 additional surface parking"

Page 3.6-27 Line 22

Quarry operations are scheduled to cease at the end of 2004, not 2003.

Figure 3.6-3

Simulation shows far more tree removal, much less forested buffer, than will occur and therefore makes golf course view look much more open than will be the case.

Figure 3.6-10

Simulation building appears too close to Congress Road, with too little forest buffer. Substantial landscape screening will minimize view of units contrary to this simulation.

Chapter 3.7 – Transportation and Circulation

Page 3.7-3 Line 32

Figure listed is incorrect. Should read "Figure 2.0-30".

Page 3.7-6 Figure 3.7-3

Bristol Curve should be shown as removed as proposed by applicant. Please correct.

Page 3.7-9 Lines 32-33; Table 3.7-1A

The construction schedule of 3.5 years, including Table 3.7-1A, is subject to change and may be extended over a longer period based upon weather, neighborhood impacts, and other factors. Additionally, the likely construction sequencing is expected to be different than shown on Table

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3.7-1A, in that the improvements to The Lodge will likely occur first, followed by the improvements to The Inn. The overall level of impacts, however, will remain the same.

Page 3.7-24 Lines 43-45

The Highway 68 / Skyline Forest Drive intersection is shown to operate at an unacceptable LOS F under existing conditions and all future conditions without and with the preservation and development plan. The identified mitigation (TC-B1-1) to signalize the intersection is necessary to accommodate both current traffic loads and the traffic loads from all future development. The share calculation to be fair must account for the existing traffic deficiencies in the cost allocation formulas. Total (AM + PM peak hours) baseline plus project traffic loads at the Highway 68 / Skyline Forest Drive intersection are about 5,060 vehicles and the project's contribution to that load is about 120 vehicles, resulting in about a 2.3% contribution.

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The document indicates that the project's fair share contribution to the Highway 68 / Skyline Forest Drive intersection is 14%. How is this calculation completed?

Page 3.7-25 Lines 19-21

The Highway 68 / Beverly Manor intersection is shown to operate at an unacceptable LOS F under existing conditions and all future conditions without and with the preservation and development plan. The identified mitigation (TC-B1-2) to signalize the intersection is necessary to accommodate both current traffic loads and the traffic loads from all future development. The share calculation to be fair must account for the existing traffic deficiencies in the cost allocation formulas. Total (AM + PM peak hours) baseline plus project traffic loads at the Highway 68 / Beverly Manor intersection are about 5,610 vehicles and the project's contribution to that load is about 120 vehicles, resulting in about a 2.1% contribution.

58

The document indicates that the project's fair share contribution to the Highway 68 / Beverly Manor intersection is 12%. How is this calculation completed?

Page 3.7-25 to 26 Lines 22-47 and 1-28

The Highway 68 / Aguajito Road intersection is shown to operate at an unacceptable LOS F under existing conditions and all future conditions without and with the preservation and development plan. The identified mitigation (TC-B1-3) to provide a left turn refuge lane for traffic turning left from Aguajito Road provides a calculated "theoretical" LOS benefit. Practically, this mitigation is unnecessary as the left turn refuge lane would serve less than 30 cars during the peak hour, representing a maximum of one car every two minutes.

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This situation provides a good example as to why the County's unsignalized intersection significance criteria, as currently written, should be redefined.

If, despite the fact there is no practical need for the refuge lane, the identified mitigation (TC-B1-3) to add a refuge lane to the intersection is still considered necessary to accommodate both current traffic loads and the traffic loads from all future development, then the share calculation to be fair must account for the existing traffic deficiencies in the cost allocation formulas. Total (AM + PM peak hours) baseline plus project traffic loads at the Highway 68 / Aguajito Road intersection are about 3,740 vehicles and the project's contribution to that load is about 100 vehicles, resulting in about a 2.7% contribution.

The document indicates that the project's fair share contribution to the Highway 68 / Aguajito Road intersection is 17%. How is this calculation completed?

Finally, on Page 3.7-26 Line 5, "traffic signal" should be changed to "refuge lane".

Page 3.7-37 Line 32

Change "59 spaces" to "68 spaces." [See Table 3.7-13]

E

Page 3.7-39 to 40 Lines 4-43 and 1-41 (Impact and Mitigation Measure TC-F1)

The DEIR indicates that the project does not include specific additional trip reduction measures for purposes of visitor-serving and residential uses. This statement is inaccurate as it does not account for the substantial efforts by the project to reduce regional traffic through workforce housing. Nor does the DEIR acknowledge the visitor-serving shuttle service that currently exists. This system serves guests between commercial and tourist areas within Del Monte Forest and also serves guests to downtown Carmel. Employees also use these shuttles to travel between work sites within Del Monte Forest.

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The project incorporates 60 work-force housing units. Without the workforce housing workers within Del Monte Forest would most likely live outside the Del Monte Forest area and commute to their work site within the Forest via private vehicle. These units, serving workers within Del Monte Forest, represent an innovative way to reduce vehicle trips on the regional road system including Highway 1 and Highway 68.

Given these existing trip reduction features as well as the others mentioned in the DEIR, the project's impact should be restated to less-than significant, no additional mitigation required.

Page 3.7-39 Line 13

Change "3.6 miles" to "2.4 miles." [See revised Trail Map P-7]

Chapter 3.8 – Air Quality

Page 3.8-2 Line 6

Change "62" to "60 employee housing units."

E

Page 3.8-8 to -9 Lines 21-42 and 1-7. (Impact and Mitigation Measure AIR-C2)

The impact and mitigation measure are neither reasonable nor necessary based on the facts presented. The major local civil contractor in this area, Granite Construction, has no diesel equipment outfitted with catalytic particulate filters. We are aware of no other local project where this impact and mitigation have been proposed. These localized impacts in the areas proposed are unlikely to have any significant impact warranting these changes to standard construction equipment.

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Chapter 3.9 – Noise

Page 3.9-4 Line 18

Change "3.6 miles" to "2.4 miles". [See revised Trail Map P-7]

Chapter 4.3 – Growth Inducing Impacts

Page 4.3-1 Line 20

Change sentence to read "The Proposed Project would add a total of 160 visitor serving units at Spanish Bay Resort, The Lodge at Pebble Beach, and the Golf Cottages."

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Page 4.3-1 Line 27

Change "62" to "60 employee housing units."

Page 4.3-2 Line 4

Change "150" to "144 new jobs". [See Page 3.5-17 Line 10]

Page 4.3-2 Lines 25-28

Change "33 new home sites" to "a net increase of 31 new home sites (33 - 2 lots removed at Collins Property = 31) and change "292" to "286" permanent residents (91 x 3.14 = 286)

Chapter 4.4 – Cumulative Impacts

Page 4.4-6 Line 19

Add a comma between "document" and "would" and change "consistency" to consistent".

Page 4.4-13-17 (Impact BIO-BI(8) and Mitigation Measures BIO-B1-1(C) and BIO-B1-2(C)).

As noted previously, we believe the loss cap on Monterey Pine Forest should be at least 20%, not 5%, based on prior mitigation ratios proposed by California Department of Fish & Game. There is no scientific basis for the establishment of a 5% cap on further losses of Monterey pine until a regional conservation plan can be adopted. Based on a 20% loss cap, no significant cumulative impact would be identified.

If a significant cumulative impact is nonetheless identified, we believe Mitigation Measure BIO-B1-2(c) is sufficient without the need for Mitigation Measure BIO-B1-1(c). But we believe Mitigation Measure BIO-B1-2(C), should be modified to allow the additional areas of undeveloped Monterey pine forest to come from any of the areas owned by Pebble Beach Company, rather than specifying Areas F-1, J, and the Old Capitol Site in their entirety.

Page 4.4-18 to 4.4-19 (Impact BIO-D1(c))

See comments on Yadon's piperia under Biology section.

Page 4.4-26 Line 31

Change "454" to "458 acres of Monterey Pine Forest." [See Table 3.3-1]

Page 4.4-32 Lines 26-36

There are no direct or cumulative impacts on police services. See comments on Mitigation Measure PSU-A2 on pages 3.5-6 to -7.

Page 4.4-34 and Table 4.4-6

The number of existing undeveloped residential lots will be reduced from 144 to 143 by removal of the one undeveloped Collins residential lot (in addition to the Collin's home on the other lot).

Page 4.4-43 Line 13

Change "Marin" to "Marina."

Page 4.4-45 Line 1-11

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See comments to Impacts and Mitigation Measure AIR-C2 on pages 3.8-8 to -9. This impact is localized and the required mitigation is unnecessary.

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Page 4.4-48 Lines 1-13

The document infers that the project contributes to a significant impact at the Highway 1 / Ocean Avenue and Highway 1 / Carmel Valley Road signalized intersections and that mitigation is necessary to reduce the significant impact to a less than significant level.

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Table 4.4-12 indicates that both referenced intersections operate at LOS D in the cumulative scenario without and with the project. Furthermore, the DEIR (page 4.4-48) indicates that the project volume-to-capacity ratio contribution is 0.73% and 0.32% to the Highway 1 / Ocean Avenue and Highway 1 / Carmel Valley Road intersections, respectively.

Significance Criteria (page 3.7-18) indicates that an impact is considered significant if the project would cause a 1.0% or more increase in the critical movement's volume-to-capacity ratio due to increased traffic where an intersection is already at LOS D or E.

As indicated above the project contributes less than 1.0% to the critical volume-to-capacity ratio at the Highway 1 / Ocean Avenue and Highway 1 / Carmel Valley Road intersections. Thus, the impact is less than significant and no mitigation measure is necessary.

Page 4.4-49 Lines 29-31

The document indicates that the project would contribute about 2.7% to the traffic volumes at the Highway 68 / Highway 1 SB Off-Ramp intersection. Page 4.4-50 indicates that the project's critical volume-to-capacity ratio at this intersection improves by about 16% in the AM peak hour and 36% in the PM peak hour. This improvement occurs because of the Highway 68 Phase 1B Improvement Project proposed as part of the preservation and development plan.

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Page 4.4-50 Lines 10-21

The document infers that the project contributes to a significant impact at the Highway 1 / Carpenter Street and Highway 1 / Rio Road signalized intersections and that mitigation is necessary to reduce the significant impact to a less than significant level.

Table 4.4-12 indicates that the Highway 1 / Carpenter Street intersection is expected to operate at LOS E without and with the project. The project's volume-to-capacity ratio contribution, according to page 4.4-50, is 0.29%. The Highway 1 / Rio Road intersection is expected to operate at LOS D without and with the project and the project's contribution to the volume-to-capacity ratio is shown to be 0.37% (page 4.4-50).

Significance Criteria (page 3.7-18) indicates that an impact is considered significant if the project would cause a 1.0% or more increase in the critical movement's volume-to-capacity ratio due to increased traffic where an intersection is already at LOS D or E.

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As indicated above, the project contributes less than 1.0% to the critical volume-to-capacity ratio at the Highway 1 / Carpenter Street and Highway 1 / Rio Road intersections. Thus, the impact is less than significant and no mitigation measure is necessary.

Chapter 5 – Alternatives

Page 5.0-5 Lines 1-11, Alternatives

The selection of alternatives must be capable of being accomplished "taking into account economic, legal, social, and technological factors" (Guideline Section 15364), and the County must consider, among other factors, site suitability and economic viability in determining the range of alternatives to be considered (Guideline Section 15126.6(f)). Each of the alternatives selected must meet most or all of the project objectives. It is not enough that they meet "some" of the objectives. Therefore, alternatives must incorporate a balance between two mutually dependent basic project objectives: (1) preservation and effective management of natural resources both for environmental protection and to maintain the attractiveness of the area as a visitor destination; and (2) enhancement of visitor serving uses in a manner meets the objectives of the applicant and also assures that sufficient resources will be available to ensure the long-term viability of the natural open space areas. Alternatives that do not meet the most basic and fundamental objectives of the project do not meet these requirements.

Alternatives that do not include an eighteen-hole championship golf course fail to meet the overriding, key objective of the project.

Page 5.0-8 to 21, Nine Hole Addition to Spyglass and Other Changes

A nine hole addition to Spyglass would be infeasible for the following reasons:

- The land specified in Figure 5.1 for a 9 hole expansion is physically inadequate for operating a 9 hole addition. The narrow strip of land between the existing Spyglass quarry and the Equestrian Center could at most accommodate one hole playing from the quarry to the Equestrian Center. But assuming you could place five great golf holes on the land available at the Equestrian Center, there is no way to play back from the Center to the quarry. A golfer finishing the sixth hole would face a walk or a golf cart ride on the order of 300 to 400 yards, or possibly more, to the seventh hole, a distance that is totally unacceptable from an architectural and operational standpoint. The 9 hole addition proposed by the DEIR under Alternatives 2 and 3 is therefore infeasible from a design and operational standpoint.
- Spyglass Hill has a private club component, The Founders' Club (established when the course was constructed almost forty years ago), that has exclusive control over one and a half hours of tee times on weekdays, two hours of tee times on weekends, and ten full days for tournament play. Additionally, by contract, the Northern California Golf Association (NCGA) has control over thirty full days of tee times at Spyglass for tournament play. Neither the Founders' Club nor the NCGA is affiliated with or controlled by Pebble Beach Company. Of the estimated 55,000 rounds per year available at Spyglass, The Founders' Club and the NCGA together control approximately 17,500 rounds, and the Pebble Beach Company controls approximately 37,500 rounds. Assuming the DEIR's estimate of a 50% increase in rounds is correct, Pebble Beach Company would see a maximum increase of 18,750 -- about one-third the number of rounds that a new stand-alone eighteen-hole championship golf course would produce.
- An additional 18,750 rounds would be insufficient to meet the business needs of the Company for additional world class golf to serve its guests. With the potential for approximately 50,000 room nights from the new hotel rooms, a new golf course would meet that demand by supplying up to 55,000 rounds of golf. A 9 hole addition would fall far short of meeting that demand, assuming golfers even wanted to play a modified version of Spyglass.
- The incremental profits from an additional 18,750 rounds would be insufficient to support the extensive capital costs of the golf course project, including construction of the new nine holes, the new equestrian center, and road and other infrastructure improvements as well as contributions to Highway 68 improvements. Based on brief financial analysis, the estimated capital costs for a 9 hole golf course, including a renovated clubhouse, expanded maintenance facilities, road improvements, a re-located equestrian center, and financing costs, would be approximately \$40 million. The incremental profits estimated would be less than \$1 million, given the negative impacts that can reasonably be expected on average greens fees from guests who would be playing the new "27 hole" Spyglass. Rather than 37,500 rounds being played on the original, classic Spyglass (as is the case

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today), a 9 hole addition would have only 18,750 rounds that play all 18 holes of the original course. The remaining potential for 37,500 rounds would be played using only half of the original Spyglass. Half of these rounds would be played starting on the back nine of Spyglass, and finishing on the new nine hole addition; the other half would be played starting on the new nine hole addition, and finishing on the front nine of Spyglass. We believe that these 38,500 rounds would demand approximately a \$75 to \$100 discount off of the current Spyglass greens fees, as guests would only be playing nine of the original, classic Spyglass Course. The impact of these lower greens fee on the 18,750 rounds currently played at the full Spyglass rate would greatly reduce the incremental profits from a 9 hole addition, to the extent that we would expect total incremental operating profits (incremental revenues minus incremental costs of operating the 9 hole addition and an expanded clubhouse to serve the additional guests and the incremental costs of additional forest management proposed) to be less than \$1 million. With a \$40 million overall capital cost, the payback period for a 9 hole addition would be approximately 40 years, and the return on investment miniscule. This alternative is therefore financially infeasible, as no one would build a 9 hole addition with such returns.

- Additionally, the tee times controlled by The Founders' Club and the NCGA would prevent the efficient functioning of an additional nine holes at Spyglass needed to produce even 18,750 rounds. Golfers teeing off on the "new" nine holes would be unable to move to the existing front nine at Spyglass during the one and a half to two hours when The Founders' Club members are teeing off. Also, for forty days per year, Spyglass is unavailable because of Founders' Club and NCGA tournaments. During these forty days, the new nine holes would have to operate on a stand alone basis, and that would not only further reduce the financial return from the project, but also be unacceptable to golfers.
- Finally, the golfing public would refuse to accept a nine hole addition to the world-famous Spyglass Hill Golf Course. Spyglass is ranked in the top ten publicly available courses in the U.S. by Golf Magazine, one of the premier golf publications in this country. Golfers who visit the Pebble Beach Resort do so to play world class golf courses – courses that have a history and stature unparalleled among courses that are open to the public. Adding a "new" nine holes to an existing famous, traditional golf course, designed by Robert Trent Jones Jr., one of America's most famous golf course architects, would be similar to commissioning a modern painter to add on to a classic painting. The golfing public and media would view such an effort as a denigration of the Spyglass experience, not an improvement. Golfers would want to play the original eighteen holes, rather than the original nine holes plus a new nine hole addition.
- Any 9 hole alternative that either kept the existing Equestrian Center in place (to reduce capital costs) or provided for an operationally feasible design would have similar if not identical environmental impacts as posited by the DEIR for the current project. As a result, any such alternative would fail to reduce the environmental impacts of the project.
- Additionally, the other changes proposed by Alternatives 2 and/or 3, including moving employee units away from Spanish Bay, reducing the driving range, reducing the number of visitor-serving units, reducing the equestrian center size, and altering the size or location of residential lots, would affect significant objectives of the project in ways that are unnecessary to significantly mitigate project impacts. These alternative suggestions should be rejected as negatively affecting the overall project's objectives.

Pages 5.0-22 to -35 No Golf Course Alternative

For the same reasons discussed above, a no golf course alternative would fail to meet the applicant's project objectives. The vast majority of guests travel to Pebble Beach Resort primarily for golf, as well as the environmental setting and beauty. Neither the recreational/visitor-serving components (golf course and hotel rooms) nor the open space preservation components (including preservation and management) would be met by this alternative. As noted above, the golf course provides the financial returns that support the economics of the Project components,

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including the preservation and management of the proposed permanent open space areas. The other changes proposed by Alternative 4 also negatively affect the basic objectives of the project and are unnecessary to significantly mitigate project impacts.

Pages 5.0-29 to -30 The Proposed Project is the Environmentally Superior Alternative

In determining the environmentally superior alternative, consideration must be given to the feasibility of the alternative and the extent to which the alternative meets the basic project objectives. As noted above, none of the proposed alternatives analyzed in this chapter meet either of these criteria. Only the proposed project meets these criteria and therefore the project is the Environmentally Superior Alternative. Recognition should be given to the extent to which the Project has been significantly redesigned over many years to avoid and minimize sensitive species and habitats and to preserve additional habitat in large open space areas that will be subject to recommended resource management plans. The following changes have been incorporated into the submitted Project to make it "environmentally superior":

1. The golf course clubhouse, maintenance facility, and ancillary improvements have been relocated outside of wetlands, buffers, and high density piperia areas.
2. Wetlands have been avoided and existing roadways have been removed to enhance hydrological connectivity and wetland function. These enhancements would not occur without the project.
3. The golf course parcel has been enlarged to include all remaining dune areas to ensure appropriate management objectives are incorporated into the Project. These dune areas would not be restored and managed without the project.
4. Significant occurrences of special status plant species will be protected and managed, including Yadon's Piperia and Pacific Grove Clover. This enhanced protection and management would not occur without the project.
5. A significant percentage of already fragmented forest habitats on the golf course site will be retained and managed.

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Table 5.0-1 (Alternatives Considered in DEIR)

Under the "No Project" Alternative, Summary of Alternatives Analysis column should include the number of single-family residential development that could occur on existing lots owned by Pebble Beach Company (41).

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Chapter 7 – References Cited

Page 7.0-23 Lines 13-31

All Historic Property Evaluation Reports are on file at Monterey County Planning and Building Inspection Department which is located in Marina, CA (not Pebble Beach, CA).

Appendix D

Page D-1 PBL

Construction of 63 (58 new and 5 replaced) visitor-serving units.

Page D-1 Trails

Change "3.6" to "2.4 miles of new trails." [See revised Trail Map P-7]

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Page D-4 Policy 1, Item 4

This relatively constrained site has limited improved/paved areas. Having more than two spaces per unit ensures sufficient improved spaces will be available for any extra cars and guest parking, avoiding the potential that cars will park in unimproved locations on or adjacent to the site in more resource sensitive areas. This condition should be deleted.

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Page D-9 Policy 8

Revise to reflect allowance of electric golf carts on golf trail between 14 hole and 15 tee. See comments on Page 3.3-9 Lines 30-38.

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Page D-11 Policy 9

Revise new trail miles from "3.6" to "2.4".

Page D-13 Policy 11

Measure A Section 4 (b)(b) requires management of open space recreation and preserve sites in accordance with the OSAC plan standards.

E

Page D-17 Policy 16 item 2; and Page D-19 Policy 18

Revise to reflect allowance of electric golf carts on golf trail between golf holes 14 and 15. See comments on Page 3.3-9 Lines 30-38.

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Page D-22, Policy 23

Change "133" to "134 acres of preservation area [See Table 3.3-3]

Page D-24 Policy 25

... approximately 2.4 miles of new trails [See revised Trail Map P-7]

Page D-25 Policy 25

... approximately 134 acres of preservation area [see Table 3.3-3]

E

Page D-29 Policy 31

Change "240 acres" to "680 acres" [See table 3.3-1]

Page D-37 Policy 36

The Spanish Bay employee housing site is concentrated on approximately 4 acres of the site which allows the remaining 20 acres to be preserved as open space.

Page D-60 Policy 71

Change "154" to "159" additional visitor serving units.

Page D-61 Policy 72

Change to "a net increase of 31 residential lots and 60 employee housing units"

Page D-70 Policy 89

The project will add 2.4 miles of new public trails for a total of approximately 31.4 trail miles [See revised trail map P-7]

Page D-78 Policy 105

Change "154" to "149 additional visitor serving units".

Page D-89 Policy 124

Residential subdivision F-2, F-3 and I-2 have relocated trails [see Volume I, page 2.0-14]

Page D-89 Policy 124

Change "3.6" to "2.4 miles of new trails" [See revised Trail Map P-7]

Appendix E

Page E-9 Policy 19

A total of 10.46 acres of wetlands occur within the project area: 5.9 acres within development site boundaries ... see Table 3.3-8 above.

Table E-4 following Page E-9

Revise table [see Table 3.3-8 above]

Page E-10 Policy 26

Freshwater marshes are also located in several of the proposed preservation and conservation areas, containing 1.37 acres.

Page E-10 Policy 43

Additional seasonal wetlands occur on the proposed preservation areas, containing 3.24 acres.

Table E-9 prior to Page E-17

Table needs to be corrected; numbers are not in correct locations [see table 3.3-4 above]

Page E-45 Policy 14

Add: "along a 4,930 foot stretch of Congress Road."

Appendix G

Table 6 3.3-8 & E-4, Table 6 E-5a

To be consistent with the level of precision applied to acreage determinations and wetland classifications reported in Table E-4a, some wetland acreages have been reported incorrectly and some wetland types have been misidentified: New Equestrian Center Freshwater Marsh is given as 1.14 acres, but this wetland is only partially classified as freshwater marsh. In all tables this acreage should be split between marsh and seasonal wetland portions according to the final LCP determination (Ecosynthesis 2003); Preservation Area C should be 0.81, not 0.80; Preservation Area J is classed as a Seasonal Wetland in Tables E-4 & 3.3-8 but as a Freshwater

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Marsh in Table E-5a; Preservation Area K is classed as a Seasonal Wetland in Tables E-4 & 3.3-8 but as a Freshwater Marsh in Table E-5a; Preservation Area PQR should be 1.73, not 1.70; Total Wetland Area *Subtotal in Project Preservation Areas* should be 4.61, not 4.59 in Tables 3.3-8 & E-4. In Tables 3.3-8 & E4, *Project Preservation Areas* should be called "New Preservation Areas" as referred to in Table E-5a. In Tables 3.3-8 & E4, Huckleberry Hill Natural Area should be classed as an "Existing Preserved Area" as it is in Table E-5a.

Table E-5a Last page

The first note states that "Wetlands in bold are considered.....ESHA", but there are no bolded wetlands in the table. Delete Note or add bolding where appropriate.

Table G.3-1

Employee housing units = $60 \times 3.1 = 186$, not 192.2, persons

Page E-16, Lines 39 -.

Add to beginning of paragraph. *Prior to 1990 the many Piperia collections from Del Monte Forest were thought to be part of a polymorphic species called Habenaria unalaskensis. Subsequent studies segregated the genus Piperia from Habenaria and divided it into a number of new species, one of which was Yadon's piperia.*

Page E-21 Lines 12-13

Change "winter" to "summer" to read: "It dies back in summer to a woody taproot."

Page E-39 Lines 7-11

The "natural freshwater marsh" at this location is located immediately behind residences and along a residential road and should be so stated in the text.

Page E-39 Line 7-11

Wetland J1 is classed as a "seasonal wetland" here and in Tables 3.3-8 & E-4, but listed in Tables E-26 & E-5a as a "Natural Freshwater Marsh ESHA."

Page E-47 Line 6

In the last sentence the common name "Monterey manzanita" is used. Monterey manzanita, Arctostaphylos montereyensis, is not known to occur in Del Monte Forest. Please delete this reference.

Page ES-7 Line 9

Change "3.6" to "2.4 miles of new trails." [See revised Trail Map P-7]



NOTES:

TRAIL SYSTEM SHOWN IS REPRESENTATIVE OF THE EXISTING DEL MONTE FOREST TRAIL SYSTEM. THOSE PORTIONS OF THE SYSTEM OUTSIDE THE PROPOSED PRESERVATION AND DEVELOPMENT AREA ARE INCLUDED FOR ILLUSTRATIVE PURPOSES TO SHOW HOW THE PROPOSED ON-SITE TRAIL SEGMENTS TIE INTO THE WHOLE.

- EXISTING TRAILS (29.0 MILES)
- PROPOSED TRAILS ON EXISTING DIRT ROADS OR FIRE ROADS (+2.1 MILES)
- PROPOSED TRAILS (+3.4 MILES)
- RELOCATED TRAILS (-3.1 MILES)

EXISTING TRAIL MILEAGE = 29.0
 PROPOSED TRAIL MILEAGE = 31.4

