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CONCERNED RESIDENTS OF PEBBLE BEACH *and Monterey County*

a Non-profit California Corporation

Dedicated to Preserving the Natural Environment and Quality of Life in Del Monte Forest and Peninsula Communities

November 8, 2004

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

Subject: Partial Revised Draft EIR (PRDEIR) on Pebble Beach Company's
Pending Applications for Development Projects in Del Monte Forest

Dear Mr. McCue,

Our organization commends the authors of the September 2004 PRDEIR. We are impressed with the comprehensive new mitigation requirements established under the "Yadon's Piperia" and "Water Supply and Demand" sections of the document. However, there are other environmental impacts associated with the pending applications for development projects that we feel have not been adequately addressed.

Our comments are enclosed. We understand that we will not receive a response on subjects that are not included in the PRDEIR.

We thank you and your associates for considering and acting on these comments.

Sincerely,


Ted R. Hunter


Carl E. Nielsen

enclosure

cc: CR-PB Steering Committee and Advisory Committee
Scott Hennessy, Director; Jeff Main, Planning Manager
Dan Carl, Calif. Coastal Commission

Nov. 8, 2004

Concerned Residents of Pebble Beach and Monterey County

Comments on PRDEIR and other Environmental Impacts associated with Pebble Beach Company's Pending Applications for Development Projects in Del Mont Forest

COMMENTS ON PRDEIR

1. Water Supply and Demand

We strongly support the revisions to the DEIR with respect to water supply and demand. It is essential that the proposed upgraded water reclamation system operate at design capacity before any actual development occurs. The recommended mitigation measures represent a very logical approach of resolving all water issues before approval of development plans.

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2. Yadon's Piperia

We are impressed with the comprehensive mitigation program outlined in the PRDEIR with respect to Yadon's piperia. We have two comments:

Mitigation Measure BIO-D1-1 Avoidance

The first item concerning building envelopes contains the final sentence: "This measure would reduce the loss of approximately 1.4 acres containing 34 individuals". The total proposed preservation population is over 86,000. It seems to us that the proposed reduction of loss of 34 individuals is so insignificant relative to the total that one could easily conclude that the administrative effort to implement this portion of BIO-D1-1 is not worth the benefit.

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The intent of the mitigation measure is to preserve as much of the Yadon's piperia population as possible. The Piperia Plan is directed solely to the land under the ownership of the applicant; however, there are populations that will be located on private property with restrictions intended to protect the populations. Even if there are deed restrictions relative to Yadon's Piperia how will these restrictions be enforced after approval of the original building permits are issued? Considering the financial condition of the County it seems unlikely there would be personnel available for periodic compliance inspections. Does the County expect the Del Monte Forest Foundation to enforce the preservation of the areas covered by the negative easements? Should enforcement be part of the responsibilities of those involved in the implementation of the Piperia Plan?

Mitigation Measure BIO-D1-4 Piperia Plan

We wish to compliment the County on the development of the Piperia Plan. It is the first time conditions have been imposed on the applicant with specificity in performance requirements, management oversight of the execution of the plan and meaningful penalties if the plan is not adequately funded.

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3. Long Term Noise

The PRDEIR and DEIR did not address the problem of long term noise resulting from the conduct of equestrian events on the Lower Sawmill Gulch portion of the proposed Equestrian Center. There were 48 days of equestrian events conducted on the present equestrian center site this past year. This does not include set up and take down of temporary stables, etc. The largest number of equestrian event days occur during the summertime when the resulting noise will really affect the residences in the area. It should be noted that there are a substantial number of residents located from less than 200 feet to 400 or 500 feet of the equestrian center site. We believe there will be a significant impact on the residents and no mitigation measures have even been considered. Noise analysis in the DEIR dealt with steady-state noise such as ventilator noise or regular operations of maintenance equipment. The noises generated from all of the various special event activities on the Lower Sawmill Gulch site will not be steady state but will be frequent and loud and very disturbing to residents in the area. We compare this with noises resulting from aircraft operations which are not steady state but frequent and loud in nature and are recognized to be very disturbing to humans. We would appreciate comments on the subject.

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COMMENTS ON ENVIRONMENTAL IMPACTS NOT ADEQUATELY ADDRESSED IN DEIR OR PRDEIR

1. Highway One Road Improvement at Entrance/Exit to Del Monte Forest

The final EIR should make it clear that this road work must be completed before any construction on the proposed projects can begin.

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2. Certification/Approval of the Measure "A" Initiative

County action on this Measure with major changes in Forest zoning and Land Use Plans needs to be taken. When will this happen? The Final EIR needs to cover this.

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3. Major Loss of Monterey Pines and 19 Species of Plants

The Final EIR needs to cover the Coastal Commission's staff recommendation that the Monterey Pine Forest be designated an ESHA.

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4. Limits on Further Commercial Growth Required

One of the Measure "A" purposes reads.... "to encourage future visitor-serving development adjacent to existing visitor-serving or recreational facilities". The Final EIR should clearly state that the pending development projects represent the Final Build-Out in the Del Monte Forest.

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