

P-22

**McCue, Thom 883-7528**

**From:** Linda Smith [lachmund@pacbell.net]  
**Sent:** Wednesday, November 10, 2004 11:50 AM  
**To:** McCue, Thom 883-7528  
**Cc:** Lee Otter; Dan Carl; Carl Wilcox; 100-District 5 (831) 647-7755; Hennessy, Scott (831)883-7516; 100-District 2 (831) 724-8228  
**Subject:** Comments on Partially Revised Draft Environmental Impact Report for PBCo. project

Thomas McCue, Senior Planner  
Monterey County Planning and Building Inspection Department  
2620 First Street  
Marina, CA 93933

Re: Partially Revised Draft Environmental Impact Report for Pebble Beach Company's Del Monte Forest Preservation and Development Plan

Dear Mr. McCue:

Attached are *Monterey Pine Forest Watch's* comment on this PRDIER. Also attached are our previous comments and those of the California Coastal Commission and the California Department of Fish and Game on the DEIR on this project.

Our group has long been interested in the native Monterey Pine Forest in Del Monte Forest and advocated for sensitive development within this threatened state resource. We have fashioned three (3) less destructive alternatives to the present plan, which we believe should be scaled back to preserve more of this rare forest resource, and we hope they will be seriously considered in this process. These alternative are also attached.

Sincerely yours,

Linda L. Smith  
President  
Monterey Pine Forest Watch  
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Carmel, CA 93921  
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11/10/2004

November 9, 2004

Thom McCue, Senior Planner  
Monterey County Planning Building Inspection Department  
2620 First Avenue  
Marina, CA 93933

Re: Revised Draft Environmental Impact Report for Pebble Beach Company's Del Monte Forest Preservation and Development Plan

Dear Mr. McCue:

*Monterey Pine Forest Watch* has reviewed the Partially Revised Draft Environment Impact Report (PRDEIR) dated September 2004, and we were disappointed to see that a number of concerns about the project's impact on the Monterey Pine Forest habitat in Del Monte Forest raised by ourselves, the Department of Fish and Game and the Coastal Commission (previous comments attached) and others have not yet been addressed. These concerns are supported by substantial scientific information.

Specifically we note the following continuing inadequacies in the DEIR and PRDEIR:

1. The lack of adequate mapping of ESHA within Del Monte Forest, as defined by the California Coastal Act, and related to this, | 1
2. The lack of adequate information regarding forest habitat values and variations according to geomorphic surfaces on the marine terraces described in the Jones and Stokes 1994 and 1996 ecological studies done for the Department of Fish and Game and the California Native Plant Society. We are concerned specifically about the development of a driving range in Area C, which is part of the last substantial, contiguous remnant of Monterey Pine Forest on Middle Aged Dunes. | 2
3. The lack of mapping of Maritime Chaparral found in association with Monterey Pine Forest within Del Monte Forest. Maritime Chaparral is in itself a sensitive plant community and in association with Monterey Pine Forest it is particularly rare. Because of this special protection is warranted. | 3
4. The lack of further description of and mitigation for potential "edge effects" from proposed residential and other development. Specifically we are concerned with residential development in PQR, where lots intrude deeply into this pristine and sensitive forest stand and preservation area. In the same way proposed residences in F3 and their potential effects on the sensitive resources of Huckleberry Hill Natural Habitat Area (HHBHA) and SFB Morse Preserve are of grave concern, as are the potential effects of development of an equestrian center in the Sawmill Gulch Quarry sites on the sensitive resources of SFB Morse Preserve and HHNHA. Employee housing in the Corporation Yard will create an | 4

intense use "inholding" in the middle of the preserved forest habitat of Area G and HHNHA and will have inevitable adverse effects on that habitat.

5. The lack of information on cumulative impacts of the proposed project on the unusual Monterey Pine Forest habitat within Del Monte Forest, as well as on the Monterey population as a whole, and on the wildlife species that utilize it. 5
6. The lack of adequate discussion of conflicts concerning the conservation easements on the Sawmill Gulch sites, which were a condition of Spanish Bay development and were meant to protect the sensitive habitat of HHNHA and SFB Morse Preserve. 6

While we applaud the proposal to set aside of significant forest habitat within Del Monte and the addition of forested mitigation lands outside DMF, particularly in the Aguajito Tract, we are concerned that other habitat values besides Yadon's piperia are not being adequately protected within Del Monte Forest. We believe that the project as configured is cumulatively still too destructive of intrinsic forest habitat values. We urge that a scaled down project alternative along with the above mentioned issues should be thoroughly addressed in a recirculated Revised Draft Environmental Impact Report. We have attached a list of three (3) alternatives that would address most of the resource issues we see as particularly important and at the same time satisfy the project proponent's goals. 7

We are grateful for the opportunity to comment on this Partially Revised Draft Environmental Impact Report.

Sincerely yours,

Linda L. Smith  
President

Attachments:

- 1.) Comments on DEIR for Pebble Beach Company plan from *Monterey Pine Forest Watch*, California Coastal Commission and California Department of Fish and Game
- 2.) Development alternatives suggested by *Monterey Pine Forest Watch*

Cc: Monterey County Board of Supervisors  
Monterey County Planning Commission  
California Coastal Commission  
California Department of Fish and Game

ALTERNATIVE DEVELOPMENT PLANS FOR DEL MONTE FOREST  
Suggested by MONTEREY PINE FOREST WATCH...June 2004

**Preferred Alternative #1:**

1. Build a 9 hole extension to Spyglass Hill golf Course creating a 27 hole golf course, fully utilizing the existing Equestrian Center plus Collins Field and thereby maintaining flexibility to avoid impacts to dunes, wetland and Yadon's piperia habitat and the removal of Monterey pine trees and other associated habitat at MNOUV..
2. Move the Equestrian Center to the greatly degraded Old Capital Site. The area fronting Highway 1 would be appropriate. Trails could be constructed throughout the rest of the Old Capitol Site, perhaps with connectivity to Jacks Peak County Park.
3. Place the Driving Range proposed for Area C in the Lower Barrow Site, maintaining and restoring the edges adjacent to SFB Morse Preserve. Continue restoration of the Upper Quarry Site and its intended function pursuant to conditions of Spanish Bay development as a buffer to the Huckleberry Hill Natural Habitat Area (HHNHA) and SFB Morse Preserve. This avoids destruction of rare Monterey Pine Forest habitat on Middle-aged Dunes and leaves the significant contiguous habitat with the Navajo Tract and Rip Van Winkle intact.
4. Eliminate residential development in PQR and in F3, thereby avoiding destruction of important and sensitive forest habitat and "edge effects" on adjacent sensitive resources of PQR preservation area and on HHNHA and SFB Morse Preserve.
5. Relocate employee housing from the Corporation Yard to Areas I-2 and F-2, thereby avoiding adverse edge effects that an inholding in the middle of HHNHA and Area G preservation area would create.
6. Leave the Golf School at the Collins property.
7. Mitigate loss of Monterey pine trees and habitat with an appropriate portion of Pebble Beach Company's Aguajito property.

7 (cont.)

**Preferred Alternative #2:**

1. Build a 9 hole extension to Spyglass Hill Golf Course, leaving the Equestrian Center at its present location. This alternative would not have the flexibility to avoid impacts to the onsite resources.
2. Place the Driving Range in the Lower Quarry as in Alternative #1.
3. Eliminate residential development in PQR and F3 as in Alternative #1.
4. Relocate employee housing from the Corporation Yard as in Alternative #1.
5. Leave the Golf School at the Collins property as in Alternative #1.
6. Mitigate with Aguajito property as in Alternative #1.

**Preferred Alternative #3:**

1. Build an 18 hole golf course, avoiding to the greatest possible extent impacts to wetlands, dunes and Yadon's piperia.
2. Move Equestrian Center to Old Capital Site as in Alternative #1.
3. Place Driving Range in Lower Quarry as in Alternative #1.
4. Place all employee housing in Areas I-2 and 8B.
5. Eliminate all other new housing.
6. Leave the Golf School at the Collins property.
7. Mitigate with Aguajito property as in Alternative #1.

**7 (cont.)**