

# Response to DEIR Individual Comments

## Introduction

This Chapter contains the written comments received on the Draft EIR and responses to issues raised in the comments. The comments and responses are grouped in six categories: federal agencies, state agencies, local agencies, individuals, organizations, and the applicant. The comments immediately precede the corresponding responses. Table 5-1 below identifies the commenters and the pages on which the comments begin. Table 5-2 presents the comments listed by commenter.

Other responses and revisions can be found in other parts of this FEIR as follows:

- Master Responses - Chapter 2
- Revisions to the DEIR and the PRDEIR - Chapter 3
- PRDEIR Comments and Individual Responses - Chapter 6
- Responses to DEIR Comment 73 (HOPE) - Chapter 7
- Responses to PRDEIR Comment P36 (HOPE) - Chapter 8

Comments were marked to identify the specific issues raised in comment and numbered accordingly in the margin. Letters were numbered in the order received. Thus the 36<sup>th</sup> letter received is identified as Comment No. 36. The specific issues raised in comment are then numbered 36.01, 36.02, etc. Some comments only consist of minor corrections to the text of the DEIR. These are identified by the symbol “E” in the margin for errata; errata changes are included in Chapter 3.

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Table 5-2  
PBC DMF/PDP DEIR Comments  
By Author

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
93.01	04/13/04	Federal Agency	NOAA Fisheries	Public Services and Utilities	Water Supply and Demand	Approval of project would result in additional diversions from the Carmel River, further degrade stream habitat, and may result in take of listed species. Project should be deferred until alternative water supplies are developed.	See Master Response MR-PSU-2 in Chapter 2.
107.01	07/01/04	Federal Agency	NOAA Fisheries	Public Services and Utilities	Water Supply and Demand	Questions whether applicant's entitlement constitutes a valid basis of water right.	See Master Response MR-PSU-2 in Chapter 2.
107.02	07/01/04	Federal Agency	NOAA Fisheries	Public Services and Utilities	Water Supply and Demand	Notes that SWRCB desires FEIR address environmental effects of water diversions and mitigation measures.	See Master Response MR-PSU-2 in Chapter 2.
107.03	07/01/04	Federal Agency	NOAA Fisheries	Public Services and Utilities	Water Supply and Demand	States that if the Recycled Water Project Phase II is constructed jointly with Proposed Project and the combined projects negate the need for additional diversions associated with the "water entitlement", NOAA Fisheries would have no misgivings about the project.	See Master Response MR-PSU-2 in Chapter 2.
107.04	07/01/04	Federal Agency	NOAA Fisheries	Public Services and Utilities	Water Supply and Demand	Recommends funding and construction of Recycled Water Project Phase II be made part of the project or a condition of approval.	See Master Response MR-PSU-2 in Chapter 2.
94.01	04/16/04	Federal Agency	USFWS	Biology	General	Supports preservation of PQR, G, H, I-1 and L	Comment noted
94.02	04/16/04	Federal Agency	USFWS	Biology	California red-legged frog	Adverse effects to CRLF covered through Section 7 consultation; if take is not covered under Section 7, recommend application prepare HCP, or work with USFWS to implement BMPS and other measures	Comment noted
94.04	04/16/04	Federal Agency	USFWS	Biology	Monterey clover	Support recommendations for active management and preservation	Comment noted
94.05	04/16/04	Federal Agency	USFWS	Biology	Gowen cypress/Bishop pine	Loss of planted GC at Sawmill should be mitigated if these were planted as prior mitigation	94.05
94.06	04/16/04	Federal Agency	USFWS	Biology	Resource Management Plans Spanish Bay Permit Conditions and Sawmill Easements	Specific recommendations about implementation; recommends permanent prohibition of future easement conversions	See Master Response MR-LU-2 and MR-BIO-9 in Chapter 2.
94.07	04/16/04	Federal Agency	USFWS	Biology	HHNA	Recommends increasing protective actions if trail use impacts to sensitive species	See Master Response MR-BIO-4 in Chapter 2.
94.08	04/16/04	Federal Agency	USFWS	Biology	Dune habitat and species	Agree with recommendations for preconstruction surveys and planting of host plants	See Master Response MR-BIO-2 in Chapter 2.
94.09	04/16/04	Federal Agency	USFWS	Biology	Dune habitat and species	FEIR should describe impacts to listed species better and how impacts avoided and minimized.	See Master Response MR-BIO-2 in Chapter 2.
94.03a	04/16/04	Federal Agency	USFWS	Biology	Yadon's piperia	Additional year survey should be done; FEIR should explain acreage estimates	See Master Response MR-BIO-6 in Chapter 2.
94.03b	04/16/04	Federal Agency	USFWS	Biology	Yadon's piperia	Cumulative discussion should low locations of cumulative development	See Master Response MR-BIO-6 in Chapter 2.
94.03c	04/16/04	Federal Agency	USFWS	Project Description	Preservation Area	Boundaries of PQR preservation should be clarified	94.03c
94.03d	04/16/04	Federal Agency	USFWS	Biology	Yadon's piperia	EIR should include assessment of habitat fragmentation	See Master Response MR-BIO-6 in Chapter 2.
94.03e	04/16/04	Federal Agency	USFWS	Biology	Yadon's piperia	Recommend relocation of PQR lots to areas where they would not effect YP	See Master Response MR-BIO-6 in Chapter 2.
94.03f	04/16/04	Federal Agency	USFWS	Biology	Yadon's piperia	Include map of required preservation mitigation areas and describe their habitat values	See Master Response MR-BIO-6 in Chapter 2.
94.03g	04/16/04	Federal Agency	USFWS	Biology	Yadon's piperia	TEAM plan is experimental; focus should be on enhancement, experimentation, and research; avoidance of harming existing populations with translocation, etc.	See Master Response MR-BIO-6 in Chapter 2.
94.03h	04/16/04	Federal Agency	USFWS	Biology	Yadon's piperia	Need success criteria and contingency mitigation	See Master Response MR-BIO-6 in Chapter 2.
42.02	03/22/04	State Agency	Caltrans	Transportation and Circulation	DMF Gates	Applicant should perform a complete operational analysis of this gate	42.02
42.03	03/22/04	State Agency	Caltrans	Transportation and Circulation	Construction	Contact Caltrans to determine if traffic management plans required	Comment noted
42.04	03/22/04	State Agency	Caltrans	Hydrology and Water Quality	Please see Hydrology and Water Quality (HWQ), MR-1 Horse Manure in Chapter 2	Describe in detail liquid waste control to avoid groundwater contamination	See Master Response MR-HWQ-1 in Chapter 2.
42.05	03/22/04	State Agency	Caltrans	Air Quality	Plan Consistency	Does AQMP include project?	42.05
42.06	03/22/04	State Agency	Caltrans	Aesthetics	Scenic vistas	68 is a scenic highway; visual impacts not addressed except at 1/68.	42.06
42.07	03/22/04	State Agency	Caltrans	Other	Caltrans encroachment permit	DEIR or FEIR will not satisfy all environmental review requirements for encroachment permit, application must provide state right of way specific data.	This comment is noted
42.08	03/22/04	State Agency	Caltrans	Transportation and Circulation	Highway 68	Method of calculation should be disclosed, consultation with Caltrans re: amounts	See Master Response MR-TC-1 in Chapter 2.
42.09	03/22/04	State Agency	Caltrans	Transportation and Circulation	Highway 68	Discuss full connection of proposed project to Route 68 widening project.	See Master Response MR-TC-1 in Chapter 2.
42.01	03/22/04	State Agency	Caltrans	Transportation and Circulation	Highway 68	Caltrans does not support signalization at Skyline Forest due to geometric alignment and sight distance issues; mitigation better served to address capacity. Caltrans does not support signalization of Beverly Manor in absence of PSR 68 Widening project - mitigation should support widening project; mitigation should focus on fair-share contribution on mainline widening project and/or Scenic Drive bridge	See Master Response MR-TC-1 in Chapter 2.
58.01	03/22/04	State Agency	CCC	Statement	Statement	Overview of issues raised in letter	This comment is noted
58.02	03/22/04	State Agency	CCC	Land Use	Measure A	DEIR is inadequate because it relies on Measure A certification which is uncertain	See Master Response MR-LU-1 in Chapter 2.
58.03	03/22/04	State Agency	CCC	Land Use	Spanish Bay permit conditions and Sawmill easements	DEIR is inadequate because it relies on amendment of CCC permits which is uncertain	See Master Response MR-LU-2 in Chapter 2.
58.04	03/22/04	State Agency	CCC	Biology	ESHA definition	ESHA should be defined based on LCP definition not on exclusivity of Appendix A; emphasis on avoidance and buffering for ESHA impacts; non-resource dependent use of ESHA is unmitigable	See Master Response MR-BIO-1 in Chapter 2.
58.05	03/22/04	State Agency	CCC	Alternatives	Range of Alternatives	DEIR should analyze an alternative purely based on resource and constraint identification and avoidance	See Master Response MR-ALT-1 in Chapter 2.
58.06	03/22/04	State Agency	CCC	Biology	ESHA definition	ESHA definition in DEIR is incorrect	See Master Response MR-BIO-1 in Chapter 2.
58.07	03/22/04	State Agency	CCC	Biology	Monterey pine forest	DEIR does not quantify indirect impacts to MPF and other resources	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
58.08	03/22/04	State Agency	CCC	Biology	Yadon's piperia	DEIR does not quantify indirect impacts to YP and other resources	See Master Response MR-BIO-6 in Chapter 2.
58.09	03/22/04	State Agency	CCC	Project Description	Legal Lots	DEIR should clarify legal lot status	58.09
58.10	03/22/04	State Agency	CCC	Land Use	Spanish Bay permit conditions and Sawmill easements	HHNA boundary is outdated	See Master Response MR-LU-2 in Chapter 2.
58.11	03/22/04	State Agency	CCC	Public Services and Utilities	Water Supply and Demand	DEIR should assess current withdrawal effects on Carmel River resources, effect of additional withdrawals, and optimal river levels for species	See Master Response MR-PSU-2 in Chapter 2.
58.12	03/22/04	State Agency	CCC	Project Description	Spyglass Quarry	Historical information on quarry use, development, and permits should be provided for this site	58.12
58.13	03/22/04	State Agency	CCC	Land Use	LCP buildout	DEIR overstates potential buildout; should develop accurate buildout estimate taking into account constraints.	58.13
58.14	03/22/04	State Agency	CCC	Biology	Resource Management Plans	RMPs should be included in the DEIR	See Master Response MR-BIO-9 in Chapter 2.
58.15	03/22/04	State Agency	CCC	Biology	Monterey pine forest	Mitigation value for preservation should take into account amount of resource damage actually avoided by preservation (LCP-allowed development taking into account constraints).	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
58.16	03/22/04	State Agency	CCC	Statement	Statement	Summary of issues raised in letter	This comment is noted
78.01	03/23/04	State Agency	CDFG	Biology	Monterey pine forest	DEIR should disclose, assess, and mitigate impacts to MPF based on geomorphic/ecological staircase concept from Jones & Stokes	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
78.02	03/23/04	State Agency	CDFG	Biology	Maritime chaparral	DEIR should identify locations of maritime chaparral in impact assessment so mitigations can be evaluated.	78.02

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
78.03	03/23/04	State Agency	CDFG	Biology	Pacific Grove clover	Population of Pacific Grove clover may be more extensive than presented in DEIR and thus impact analysis may be inaccurate	See Master Response MR-BIO-8 in Chapter 2.
78.04	03/23/04	State Agency	CDFG	Biology	Monterey clover	Distribution of Monterey clover is more widespread (F2, F3, G, Haul Road, Sawmill Gulch) than DEIR describes and thus impacts have not been fully identified.	78.04
78.05	03/23/04	State Agency	CDFG	Biology	Sensitive species and habitats	DEIR does not recommend buffers for sensitive plants and no analysis of indirect effects such as trampling, fire hazard abatement, fire suppression, overspray with water, pesticides, and fertilizer application has been completed.	78.05
78.06	03/23/04	State Agency	CDFG	Biology	Dune habitat and species	DEIR does not assess indirect impacts to dune sensitive plant species; impacts could be significant; project should be redesigned to include meaningful buffer for dune species and other sensitive species and habitats; performance criteria for revegetation may not be appropriate and remedial action is not identified.; recommend additional avoidance measures to separate sensitive species and habitats from project activities.	See 78.06 and Master Response MR-BIO-2 in Chapter 2.
78.07	03/23/04	State Agency	CDFG	Biology	Sensitive species and habitats	Comment states that the project area contains a number of listed CESA species and the DFG's opinion that the project may result in take of listed plant species, and direct and indirect impact, and that take of state-listed species must be authorized by DFG. Comment also notes that DFG is of the opinion that translocation does not contribute substantially to a mitigation strategy. Comment also notes that the existing LCP buffer of 100 feet should be applied between development and any sensitive species and habitats, including wetlands.	78.07
78.08	03/23/04	State Agency	CDFG	Biology	Yadon's piperia	Impacts to Yadon's piperia should be further avoided and minimized.	See Master Response MR-BIO-6 in Chapter 2.
78.09	03/23/04	State Agency	CDFG	Biology	Sensitive species and habitats	Project redesign, as included in BIO-D1-1 should be examined to avoid impact to additional areas of sensitive resources.	78.09
78.10	03/23/04	State Agency	CDFG	Biology	Yadon's piperia	Insufficient information to determine feasibility or probable success of TEAM plan.	See Master Response MR-BIO-6 in Chapter 2.
78.11	03/23/04	State Agency	CDFG	Biology	Yadon's piperia	Additional preservation for Yadon's piperia is warranted due to uncertainty of TEAM plan success; if not feasible, specific performance standards and remediation measures are needed.	See Master Response MR-BIO-6 in Chapter 2.
78.12	03/23/04	State Agency	CDFG	Biology	Yadon's piperia	DFG recommends that some level of success in establishing, enhancing populations and growing plants from seeds be demonstrated before loss of Yadon's piperia occurs.	See Master Response MR-BIO-6 in Chapter 2.
78.13	03/23/04	State Agency	CDFG	Biology	Yadon's piperia	Approval of TEAM Plan by DFG should be a condition of approval.	See Master Response MR-BIO-6 in Chapter 2.
78.14	03/23/04	State Agency	CDFG	Biology	Yadon's piperia	The following sites should not be receiver sites for importation of plant materials: PCR, HHNA/SFB Morse, D, F1, F2, F3, G, H, and Sawmill site. Materials from MNOUV should be used at MNOUV and for ex-situ and greenhouse manipulations.	See Master Response MR-BIO-6 in Chapter 2.
78.15	03/23/04	State Agency	CDFG	Biology	Yadon's piperia	TEAM plan should be refocused to screen translocation and enhancement areas for enhancement, plan should emphasize enhancement activities on suitable sites within range of species; a research program should be developed to use MNOUV tubers not planted at MNOUV.	See Master Response MR-BIO-6 in Chapter 2.
78.16	03/23/04	State Agency	CDFG	Biology	Pacific Grove clover	Mitigation for Pacific Grove clover is inadequate, infeasible, and unreliable - golf course should be redesigned to separate the population of clover from project activities with adverse effects on species and habitat.	See Master Response MR-BIO-8 in Chapter 2.
78.17	03/23/04	State Agency	CDFG	Biology	Nesting raptors	Nesting raptor buffer for construction should be 150 feet.	78.17
78.18	03/23/04	State Agency	CDFG	Biology	Resource Management Plans	RMPs should be completed prior to certification of FEIR to assess mitigation effectiveness	See Master Response MR-BIO-9 in Chapter 2.
78.19	03/23/04	State Agency	CDFG	Hydrology and Water Quality	Manure management	BMP for equestrian waste should be developed reviewed and approved prior to project approval.	See Master Response MR-HVQ-1 in Chapter 2.
78.20	03/23/04	State Agency	CDFG	Land Use	Spanish Bay permit conditions and Sawmill easements	Amendment of Sawmill easements undermines confidence in new easements as mitigation; DFG should be included as third-party beneficiary; Sawmill easements should be retained due to location within HHNA/SFB Morse, presence of Monterey clover in vicinity of site, and due to inconsistency of proposed development.	See Master Response MR-LU-2 and MR-BIO-5 in Chapter 2.
78.21	03/23/04	State Agency	CDFG	Public Services and Utilities	Water Supply and Demand	DEIR does not assess impact of additional Carmel River withdrawals on public trust resources in river; Cal-Am restrictions appear to curtail ability to provide additional water to project regardless of legal claim or entitlements.	See Master Response MR-PSU-2 in Chapter 2.
25.01	03/17/04	State Agency	SWRCB	Public Services and Utilities	Water Supply and Demand	Water requirement is 355 AF	See Master Response MR-PSU-2 in Chapter 2.
25.02	03/17/04	State Agency	SWRCB	Public Services and Utilities	Water Supply and Demand	Lack of documentation that Cal-Am can supply project	See Master Response MR-PSU-2 in Chapter 2.
25.03	03/17/04	State Agency	SWRCB	Public Services and Utilities	Water Supply and Demand	Cal-Am has no additional water for new development	See Master Response MR-PSU-2 in Chapter 2.
25.04	03/17/04	State Agency	SWRCB	Public Services and Utilities	Water Supply and Demand	Project is 403 residential units, etc.	See Master Response MR-PSU-2 in Chapter 2.
25.05	03/17/04	State Agency	SWRCB	Public Services and Utilities	Water Supply and Demand	DEIR does not analyze prior use of parts of 380 AF entitlement and the daily impact due to this project	See Master Response MR-PSU-2 in Chapter 2.
25.06	03/17/04	State Agency	SWRCB	Public Services and Utilities	Water Supply and Demand	Diversions in excess of 380 AF will be subject to enforcement	See Master Response MR-PSU-2 in Chapter 2.
25.07	03/17/04	State Agency	SWRCB	Public Services and Utilities	Water Supply and Demand	Assess cumulative impact of transfer and reasonably foreseeable development	See Master Response MR-PSU-2 in Chapter 2.
25.08	03/17/04	State Agency	SWRCB	Public Services and Utilities	Water Supply and Demand	Specific diversion impacts must be assessed including steelhead, CRLF, drawdown and mitigation	See Master Response MR-PSU-2 in Chapter 2.
25.09	03/17/04	State Agency	SWRCB	Public Services and Utilities	Water Supply and Demand	How will water be supplied if Cal-Am can't legalize its Carmel River supply?	See Master Response MR-PSU-2 in Chapter 2.
25.10	03/17/04	State Agency	SWRCB	Public Services and Utilities	Water Supply and Demand	DEIR should analyze if diversion will result in violation of diversion agreements and whether a biological assessment is necessary	See Master Response MR-PSU-2 in Chapter 2.
99.01	04/16/04	Local Agency	Calcasno, Louis, Super. 2nd Dist.	Transportation and Circulation	Intersections outside the DMF	Concern about project impact on SR 156.	See Master Response MR-TC-3 in Chapter 2.
99.02	04/16/04	Local Agency	Calcasno, Louis, Super. 2nd Dist.	Transportation and Circulation	Intersections outside the DMF	Notes SR 156 is not discussed in DEIR. Suggests ad hoc fair-share fee mitigation for SR156 widening project be added in FEIR for project impact.	See Master Response MR-TC-3 in Chapter 2.
84.01	03/26/04	Local Agency	CAWD	Public Services and Utilities	Sewer line	Sewer line capacity not an issue for district	Comment noted
84.02	03/26/04	Local Agency	CAWD	Public Services and Utilities	Wastewater treatment capacity	DEIR estimates based on appropriate assumptions	Comment noted
84.03	03/26/04	Local Agency	CAWD	Public Services and Utilities	Water Supply and Demand	Information on present-day conditions of the Recycled Water project is accurately covered in the DEIR	See Master Response MR-PSU-2 in Chapter 2.
84.03	03/26/04	Local Agency	CAWD	Public Services and Utilities	Water Supply and Demand	Water demand of existing users of recycled water and this project (assuming 150AF) can be provided 14 out of 15 years. CAWD uses different cumulative demand because it only considers the additional golf course (8150AF).	See Master Response MR-PSU-2 in Chapter 2.
84.04	03/26/04	Local Agency	CAWD	Hydrology and Water Quality	Recycled Water quality	Golf courses evidently states "increasing problems" re: nitrogen as nitrate above 30 mg/L; there is no presently planned limit for nitrogen	This comment is noted
44.02	03/22/04	Local Agency	City of Monterey	Transportation and Circulation	Highway 68	City does not support signalization at Skyline Forest; mitigation better served to address capacity and potential cut-through traffic.	See Master Response MR-TC-1 in Chapter 2.
44.03	03/22/04	Local Agency	City of Monterey	Transportation and Circulation	Highway 68	City does not support signalization at Beverly Manor; mitigation better served to address capacity on 68.	See Master Response MR-TC-1 in Chapter 2.
44.04	03/22/04	Local Agency	City of Monterey	Biology	Tree Removal	Mitigation should include area for Highway 68 Widening tree replacement area such as Old Capitol site, cost would be paid by Highway 68 project.	44.04
44.01	03/22/04	Local Agency	City of Monterey	Transportation and Circulation	Highway 68	Project should pay fair-share of Highway 68 widening project; applicant committed to widening 68 from Scenic to Pebble Beach entrance	See Master Response MR-TC-1 in Chapter 2.
52.02	03/22/04	Local Agency	City of Pacific Grove	Transportation and Circulation	Highway 68	Internal arterial system in DMF should be developed to move traffic to Highway 1 gate and avoid increased traffic on Highway 68	See Master Response MR-TC-1 in Chapter 2.
52.03	03/22/04	Local Agency	City of Pacific Grove	Transportation and Circulation	Highway 68	Ensure that mitigation at SFB Morse Gate does not hinder ability of Highway 68 to serve as evacuation route for Pacific Grove	See Master Response MR-TC-1 in Chapter 2.
52.04	03/22/04	Local Agency	City of Pacific Grove	Transportation and Circulation	Alternative Transportation	Mitigations utilizing public transportation for DMF have not been evaluated	52.04
52.05	03/22/04	Local Agency	City of Pacific Grove	Transportation and Circulation	Parking	Special event parking should be limited to 3-4 events per year at Sawmill site to minimize impacts to Highway 68 and El Monte Park area and only to events at the New Equestrian Center	52.05
52.06	03/22/04	Local Agency	City of Pacific Grove	Biology	Monterey pine forest	DEIR does not assess impacts of forest removal at this site on Del Monte Park, need to develop a permanent open space buffer zone on undeveloped parcels adjacent to City of Pacific Grove	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.

Table 5-2  
PBC DMF/PDP DEIR Comments  
By Author

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
52.07	03/22/04	Local Agency	City of Pacific Grove	Biology	Monterey pine forest	Impacts on MPF and the gene pool must be evaluated before project is approved.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
52.08	03/22/04	Local Agency	City of Pacific Grove	Public Services and Utilities	Parks, Recreation, and Open Space	Impact of tree removal on recreational use of trails and roads in DMF needs evaluation	See Master Response MR-PSU-3 in Chapter 2.
52.09	03/22/04	Local Agency	City of Pacific Grove	Aesthetics	Visual character	Need more simulations from locations in the City of Pacific Grove to evaluate impacts	52.09
52.10	03/22/04	Local Agency	City of Pacific Grove	Land Use	Land use compatibility	No consideration of impact of development of Sawmill site on the Del Monte Park area, including land use compatibility, noise, odor, lighting, dust, and drainage.	52.10
52.11	03/22/04	Local Agency	City of Pacific Grove	Land Use	Spanish Bay permit conditions and Sawmill easements	Sawmill site is mitigation site for Spanish Bay, mitigations should include dedications of permanent open space to fulfill the intent of existing mitigation to preserve MPF	See Master Response MR-LU-2 in Chapter 2.
52.12	03/22/04	Local Agency	City of Pacific Grove	Land Use	Land use compatibility	Proposes deed restrictions or dedications for undeveloped land between SFB Morse Drive/Congress Ave and City limits. Proposed alternative trails be developed to connect Del Monte Park area with forest trails if project affects existing trails.	52.12
52.13	03/22/04	Local Agency	City of Pacific Grove	Public Services and Utilities	Public Services	Impact of project on Pacific Grove services such as library, museum, and recreation should be assessed along with mitigations.	52.13
52.01	03/22/04	Local Agency	City of Pacific Grove	Transportation and Circulation	Intersections outside the DMF	DEIR does not assess impacts on LOS of streets and intersections in Pacific Grove.	52.01
82.01	03/25/04	Local Agency	LACFO	Public Services and Utilities	No comment	No LACFO action will be required and Commission has no comment.	No comment
10.01	03/01/04	Local Agency	MBUAPCD	Air Quality	Construction	Justification for construction limitation to 13 acres/day not provided	10.01
10.02	03/01/04	Local Agency	MBUAPCD	Air Quality	Construction	District threshold for diesel exhaust should be cited, need risk assessment, recommends catalytic particulate filters be used	10.02
10.03	03/01/04	Local Agency	MBUAPCD	Air Quality	Long-Term Emissions	Prescribed burns will require MBUAPCD permit	Comment noted
26.01	03/18/04	Local Agency	Monterey County Environmental Health	No comments	No comments	No comments.	Comment Noted
18.01	03/10/04	Local Agency	Monterey County Parks Department	Cultural Resources	Existing Equestrian Center	Assess Kent Seavey's evaluation of existing EQ center buildings as significant historic resources	18.01
57.01	03/22/04	Local Agency	Monterey County Parks Department	Public Services and Utilities	Parks, Recreation, and Open Space	DEIR should mention Section 19.12.010 of the Subdivision Ordinance requiring 0.3 acres of land for residential park and recreation purposes and require in-situ fee.	See Master Response MR-PSU-3 in Chapter 2.
57.02	03/22/04	Local Agency	Monterey County Parks Department	Public Services and Utilities	Parks, Recreation, and Open Space	Recommend site-specific active recreation for employee housing areas.	See Master Response MR-PSU-3 in Chapter 2.
57.03	03/22/04	Local Agency	Monterey County Parks Department	Public Services and Utilities	Parks, Recreation, and Open Space	Recommend applicant contact MPRPD to coordinate connections to exterior trails	See Master Response MR-PSU-3 in Chapter 2.
51.01	03/22/04	Local Agency	MPWMD	Public Services and Utilities	Water Supply and Demand	Supports no use of potable water for irrigation	See Master Response MR-PSU-2 in Chapter 2.
51.02	03/22/04	Local Agency	MPWMD	Public Services and Utilities	Water Supply and Demand	Cumulative irrigation cannot be met by Phase II	See Master Response MR-PSU-2 in Chapter 2.
51.03	03/22/04	Local Agency	MPWMD	Public Services and Utilities	Water Supply and Demand	Clarify entitlement table	See Master Response MR-PSU-2 in Chapter 2.
51.04	03/22/04	Local Agency	MPWMD	Public Services and Utilities	Water Supply and Demand	GC water use should be based on actual use in DMF GCs; residential factor may be low.	See Master Response MR-PSU-2 in Chapter 2.
103.01	06/10/04	Local Agency	MPWMD	Public Services and Utilities	Water Supply and Demand	Recognizes applicant's remaining entitlement to 355 AF if use complies with County and MPWMD regulations and is not water waste. Urges effort to reduce potable use for irrigation and expansion of Recycled Water Plant.	See Master Response MR-PSU-2 in Chapter 2.
28.01	03/19/04	Local Agency	MST	Transportation and Circulation	Alternative Transportation	Believes there is demand for transit in DMF	Comment Noted
28.02	03/19/04	Local Agency	MST	Transportation and Circulation	Alternative Transportation	Denying access to jobs is unfair and economically harmful	Comment Noted
28.03	03/19/04	Local Agency	MST	Transportation and Circulation	Alternative Transportation	Lack of public transit is environmental justice issue and PBC's responsibility	Comment Noted
28.04	03/19/04	Local Agency	MST	Transportation and Circulation	Alternative Transportation	Lack of transit precludes people with disabilities without own vehicle	Comment Noted
28.05	03/19/04	Local Agency	MST	Transportation and Circulation	Alternative Transportation	Lack of transit causes congestion and worsened air quality	Comment Noted
28.06	03/19/04	Local Agency	MST	Transportation and Circulation	Alternative Transportation	Alternative transportation plan should begin upon project approval	28.06
28.07	03/19/04	Local Agency	MST	Transportation and Circulation	Alternative Transportation	PBC and Monterey County should participate in transit funding	Comment Noted
28.08	03/19/04	Local Agency	MST	Transportation and Circulation	Alternative Transportation	Believes that implementing of transit will provide access for all and want to work with applicant and County to make it happen	Comment Noted
74.01	03/22/04	Local Agency	PBCSD	Project Description	Sewer line	Minimum sewer line for new construction is 8-inch diameter	74.01
74.02	03/22/04	Local Agency	PBCSD	Public Services and Utilities	Fire Services	Clarify automatic aid agreement with Pacific Grove and Monterey	74.02
74.03	03/22/04	Local Agency	PBCSD	Transportation and Circulation	Emergency Access	Clarification of PBCSD response time goal	74.03
46.01	03/22/04	Local Agency	TAMC	Transportation and Circulation	Highway 68	Project should pay fair-share of Highway 68 widening project; applicant committed to widening 68 from Scenic to Pebble Beach entrance	See Master Response MR-TC-1 in Chapter 2.
46.02	03/22/04	Local Agency	TAMC	Transportation and Circulation	Highway 68	TAMC agrees with City of Monterey and Caltrans that mitigation for Skyline Forest and Beverly Manor should not include signalizations and mitigation should focus on capacity.	See Master Response MR-TC-1 in Chapter 2.
46.03	03/22/04	Local Agency	TAMC	Transportation and Circulation	Highway 68	TAMC does not support inclusion of proposed signalization at Skyline Forest and Beverly Manor and acceleration lane at Aguajito in Regional Fee program, TAMC believes County should be fee agency for Aguajito.	See Master Response MR-TC-1 in Chapter 2.
46.04	03/22/04	Local Agency	TAMC	Transportation and Circulation	Intersections outside the DMF	TAMC supports mitigation for impacts to SR1, requests analysis impacts to SR1 north of 68	46.04
46.05	03/22/04	Local Agency	TAMC	Transportation and Circulation	Alternative Transportation	TAMC supports alternative transportation plan and MST request to begin planning upon approval of this project, and supports Company and County contribute fair-share to transit service.	46.05
46.06	03/22/04	Local Agency	TAMC	Transportation and Circulation	Special Events	TAMC proposes applicant promote alternative modes of transport from Bay Area and Santa Cruz.	46.06
46.07	03/22/04	Local Agency	TAMC	Transportation and Circulation	Alternative Transportation	TAMC recommends applicant install a Class II bike lane from Lodge to Carmel Gate as part of facilities trip reduction plan.	46.07
46.08	03/22/04	Local Agency	TAMC	Transportation and Circulation	Alternative Transportation	TAMC provided list of additional suggested mitigation measures	46.08
60.01	03/22/04	Organization	CNPS	Land Use	Measure A	Project is based on outdated plan (existing LCP) and an amendment (Measure A) never submitted to CCC for approval. LCP buildout is not baseline and contains unrealizable buildout.	See Master Response MR-LU-1 in Chapter 2.
60.02	03/22/04	Organization	CNPS	Biology	Resource Management Plans	Transplantation is not a desirable mitigation strategy	See Master Response MR-BIO-9 in Chapter 2.
60.03	03/22/04	Organization	CNPS	Biology	Sensitive species and habitats	DEIR must analyze impacts to Hooker's manzanita, sandmat manzanita, and Eastwood's golden-fleece	60.03
60.04	03/22/04	Organization	CNPS	Biology	Yadon's piperia	TEAM plan cannot be relied upon to mitigate as it will be expensive, labor intensive, and ultimately unsuccessful. Enhancement should include protection in light of deer browsing impact.	See Master Response MR-BIO-6 in Chapter 2.
60.05	03/22/04	Organization	CNPS	Biology	Sensitive species and habitats	Mitigation BIO-D1-1 should be applied to other rare plants	60.05
60.06	03/22/04	Organization	CNPS	Biology	Yadon's piperia	Mitigation should include greater care in road maintenance and fire prevention/mowing	See Master Response MR-BIO-6 in Chapter 2.
60.07	03/22/04	Organization	CNPS	Biology	Maritime chaparral	Deplores omission of maritime chaparral from list of sensitive habitat, it forms a separate community that is increasingly rare in Del Monte Forest. It should be mapped and impacts analyzed separately so mitigations can be identified.	60.07
60.08	03/22/04	Organization	CNPS	Biology	Monterey pine forest	Unacceptable that a DEIR by Jones & Stokes would ignore the prior study by J&S describing the ecological staircase.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
60.09	03/22/04	Organization	CNPS	Alternatives	Range of Alternatives	Employee housing in Area B should be redesigned to move to nearby degraded area or move to upper quarry at Corporate yard. Area B on middle-age dunes which is high priority for conservation	See Master Response MR-ALT-1 in Chapter 2.
60.10	03/22/04	Organization	CNPS	Alternatives	Range of Alternatives	Driving Range should be moved to lower Sawmill site as part of 9-hole alternative for Spyglass addition.	See Master Response MR-ALT-1 in Chapter 2.



#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
60.11	03/22/04	Organization	CNPS	Biology	HHNA	Driving Range should be moved to lower Sawmill site and should be acceptable use of the existing easement and would not have the impacts of a new EQC. Increased horse traffic would increase disturbance, promote invasive weeds, load manure. Weed-free feed is not weed-free. Nutrient loading will change nutrient limitations in the pygmy forest. Mitigation for manure cleaning of trails is not practical and unlikely to be successful.	See Master Response MR-ALT-1, MR-BIO-3, and MR-BIO-4 in Chapter 2.
60.12	03/22/04	Organization	CNPS	Biology	Dune habitat and species	Do not agree with performance criteria of 20% non-native plants and 10% of invasive species. Expresses caution about ensuring truly local native seed for restoration.	See Master Response MR-BIO-2 in Chapter 2.
60.13	03/22/04	Organization	CNPS	Biology	ESHA definition	Disagree with County definition of ESHA in DEIR	See Master Response MR-BIO-1 in Chapter 2.
60.14	03/22/04	Organization	CNPS	Biology	Monterey pine forest	Believes MPF is ESHA, but recognizes need for compromise to allow some development. However, loss of 15,000 trees is unacceptable due to loss of genetic "library".	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
60.15	03/22/04	Organization	CNPS	Biology	Resource Management Plans	Without being able to review RMPs, it is difficult to estimate potential for success, poor experience at Spanish Bay.	See Master Response MR-BIO-9 in Chapter 2.
60.16	03/22/04	Organization	CNPS	Biology	Yadon's piperia	TEAM plan places too much emphasis on transplanting. Would support small pilot projects. Does not support mass transplants likely to fail in degraded areas or displace plants in good habitat.	See Master Response MR-BIO-6 in Chapter 2.
60.17	03/22/04	Organization	CNPS	Alternatives	Range of Alternatives	Supports alternative of 9-hole expansion of Spyglass, small boarding stable in current location, driving range in lower quarry, employee housing moved to degraded part of Area B or upper quarry.	See Master Response MR-ALT-1 in Chapter 2.
49.01	03/22/04	Organization	CRPB & MC	Format	Format	Concern that document is not arranged by application and document will not have relevancy for decision-makers	See Master Response MR-GEN-1 in Chapter 2.
49.02	03/22/04	Organization	CRPB & MC	Format	Format	DEIR does not include applications and complete descriptions and resource management plans	See Master Response MR-GEN-1 in Chapter 2.
49.03	03/22/04	Organization	CRPB & MC	Land Use	Measure A	Document is unclear when LCP is baseline and when Measure A is baseline	See Master Response MR-LU-1 in Chapter 2.
49.04	03/22/04	Organization	CRPB & MC	Mitigation Monitoring	Enforcement	Questions ability of County to enforce, supports strong sanctions for non-compliance, sanctions should be discussed in the DEIR.	See Master Response MR-GEN-3 in Chapter 2.
49.05	03/22/04	Organization	CRPB & MC	Project Description	Construction Schedule	Table 3.7-1A and 3.7-1B do not indicate priority of construction, phasing should be done, 42-month schedule is unacceptable, has DEIR analyzed effect of construction at same time.	49.05
49.06	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	Proposed use conflicts with easement; how can changing easement reduce impact to less than significant.	See Master Response MR-LU-2 in Chapter 2.
49.07	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	Easements were supposed to be in perpetuity, why is it appropriate to change now?	See Master Response MR-LU-2 in Chapter 2.
49.08	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	How is proposed New EQC consistent with "recreation" defined in easement given easement emphasis on revegetation, reforestation, and preservation.	See Master Response MR-LU-2 in Chapter 2.
49.09	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	Describe BOS and CCC findings to make use consistent with easements	See Master Response MR-LU-2 in Chapter 2.
49.10	03/22/04	Organization	CRPB & MC	Land Use	Policy Consistency	Describe why Policy 92 has relevance to Sawmill site in light of easements	See Master Response MR-LU-1 in Chapter 2.
49.11	03/22/04	Organization	CRPB & MC	Land Use	Land use designations	Impact cannot be mitigated; alternative with scaled down boarding only facility should be developed.	49.11
49.12	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	Correct reference to "lower" Sawmill	See Master Response MR-LU-2 in Chapter 2.
49.13	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	Language is too tentative regarding easement intent	See Master Response MR-LU-2 in Chapter 2.
49.14	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	New Equestrian center is inconsistent with easements	See Master Response MR-LU-2 in Chapter 2.
49.15	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	Proposed use is inconsistent with easement concept of "recreation"	See Master Response MR-LU-2 in Chapter 2.
49.16	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	Easements supersede F332 Policy 92, thus no conflict.	See Master Response MR-LU-2 in Chapter 2.
49.17	03/22/04	Organization	CRPB & MC	Project Description	New Equestrian Center	Inadequate description of center activities and temporary events; inadequacy of impact analysis without analysis of all operational and temporary events	49.17
49.18	03/22/04	Organization	CRPB & MC	Other	DMFPO Agreement	Support agreement to limit visitor-serving development to 176 new units including project.	49.18
49.19	03/22/04	Organization	CRPB & MC	Biology	Wetlands	Questions effectiveness of buffer around ESHA wetland in Sawmill site	See Master Response MR-BIO-3 in Chapter 2.
49.20	03/22/04	Organization	CRPB & MC	Hydrology and Water Quality	Manure management	Impact and mitigation does not address water quality effects of temporary events	See Master Response MR-HWQ-1 in Chapter 2.
49.21	03/22/04	Organization	CRPB & MC	Public Services and Utilities	Water Supply and Demand	Effect on Carmel River not addressed, where is entitled water stored, effect if Phase II not effective, supports restriction on use of any potable water at new golf course.	See Master Response MR-PSU-2 in Chapter 2.
49.22	03/22/04	Organization	CRPB & MC	Public Services and Utilities	Police services	Police services responsibility of County not applicant	See Master Response MR-PSU-1 in Chapter 2.
49.23	03/22/04	Organization	CRPB & MC	Public Services and Utilities	Wildland Fire Hazard	DEIR inadequate in relation to analysis of Area PQR; suggests development of additional mitigation measures; questions County liability.	49.23
49.24	03/22/04	Organization	CRPB & MC	Noise	Construction	Construction noise along Congress Road not analyzed; could significantly effect residences	49.24
49.25	03/22/04	Organization	CRPB & MC	Transportation and Circulation	Emergency Access	Road improvements inadequate in particular related to emergency access, supports separate entrance to Townhomes	49.25
49.26	03/22/04	Organization	CRPB & MC	Transportation and Circulation	Circulation	Road changes are inadequate; maps should be updated when Stevenson location resolved.	49.26
49.27	03/22/04	Organization	CRPB & MC	Transportation and Circulation	Construction	Will road changes be before construction or after? Will Bristol Curve be used for construction?	See Master Response MR-TC-2 in Chapter 2.
49.28	03/22/04	Organization	CRPB & MC	Biology	Bristol Curve	Road changes should be covered in an addendum with public review.	See Master Response MR-BIO-7 in Chapter 2.
49.29	03/22/04	Organization	CRPB & MC	Air Quality	Odor	No assessment of odor from temporary horse events; should be analyzed; compliance with nuisance rule inadequate.	49.29
49.30	03/22/04	Organization	CRPB & MC	Air Quality	Long-Term Emissions	Supports condition of temporary grass for events	49.30
49.31	03/22/04	Organization	CRPB & MC	Air Quality	Long-Term Emissions	Supports condition for strict dust control	49.31
49.32	03/22/04	Organization	CRPB & MC	Air Quality	Long-Term Emissions	DEIR does not assess dust during special events and should analyze	49.32

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
49.33	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	According to easement, the upper Borrow site was incorporated into the HHNA	See Master Response MR-LU-2 in Chapter 2.
49.34	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	No specificity as to what would be necessary to make findings that the proposed use is consistent with these easements.	See Master Response MR-LU-2 in Chapter 2.
49.35	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	How will changing or modifying the easements reduce the significant impact to less than significant?	See Master Response MR-LU-2 in Chapter 2.
49.36	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	Why does the DEIR analysis propose it appropriate to amend easement and/or make findings when the primary purpose of the easements are for revegetation, reforestation, and preservation?	See Master Response MR-LU-2 in Chapter 2.
49.37	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	Explain why new EQC is considered consistent with easement's definition of "recreation"?	See Master Response MR-LU-2 in Chapter 2.
49.38	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	Describe what findings the BOS and CCC would be in order to determine that the use is consistent with the easements	See Master Response MR-LU-2 in Chapter 2.
49.39	03/22/04	Organization	CRPB & MC	Land Use	Spanish Bay permit conditions and Sawmill easements	If Measure A is found in conflict with the Coastal Act by the CCC, then how to the easements restrictions relate to the proposed new EQC?	See Master Response MR-LU-2 in Chapter 2.
23.01	03/16/04	Organization	DMF LUAC	Format	Format	EIR should be reformatted by separate application	See Master Response MR-GEN-1 in Chapter 2.
23.02	03/16/04	Organization	DMF LUAC	Format	Format	No index; areas should be identified by road	See Master Response MR-GEN-1 in Chapter 2.
23.03	03/16/04	Organization	DMF LUAC	Project Description	Final buildout	Does this project represent "final buildout"	23.03
23.04	03/16/04	Organization	DMF LUAC	Land Use	Policy Consistency	Consistency with Coastal Act should be provided along with Measure A	See Master Response MR-LU-1 and MR-LU-3 in Chapter 2.
23.05	03/16/04	Organization	DMF LUAC	Biology	Monterey pine forest	Numbers confusing; what is "suburban forest"?	See Master Response MR-BIO-5 in Chapter 2.
23.06	03/16/04	Organization	DMF LUAC	Biology	Monterey pine forest	Numbers "intimidating" thus cumulative impact questioned	See Master Response MR-BIO-5 in Chapter 2.
23.07	03/16/04	Organization	DMF LUAC	Biology	Monterey pine forest	Mitigation should be measured on existing conditions; what is mitigation?	See Master Response MR-BIO-5 in Chapter 2.
23.08	03/16/04	Organization	DMF LUAC	Transportation and Circulation	DMF Gates	What restrictions on commercial use of SFB Morse Gate will be placed?	23.08
23.09	03/16/04	Organization	DMF LUAC	Transportation and Circulation	Highway 68	Would a barrier at 1/68/17-mile help traffic flow?	See Master Response MR-TC-1 in Chapter 2.
23.10	03/16/04	Organization	DMF LUAC	Transportation and Circulation	DMF traffic	Does golf course reduce traffic compared to existing EQ Center?	23.10
23.11	03/16/04	Organization	DMF LUAC	Transportation and Circulation	Circulation	Should the Stevenson Drive stay at its current location?	23.11
23.12	03/16/04	Organization	DMF LUAC	Hydrology and Water Quality	Water Quality	Water Quality assurances are marginal and are questioned	23.12
37.01	03/22/04	Organization	DMFPO	Statement	Statement	Project conforms to Measure A, supports exchange of easements, DEIR addressed env. impacts except beneficial impact on reducing bicycle damage, topic and mitigation index would be helpful, flexible mitigation better than prescriptive mitigation	Comment noted
37.02	03/22/04	Organization	DMFPO	Executive Summary	Refined Alternative 2	Mention that Area MNOLUV is prior environmentally superior alternative	Comment noted
37.03	03/22/04	Organization	DMFPO	Biology	Wetlands	Sawmill wetlands are man-made due to poor grading and not ESHA and should be regraded	See Master Response MR-BIO-3 in Chapter 2.
37.04	03/22/04	Organization	DMFPO	Public Services and Utilities	Water Supply and Demand	Limit on water transfer should be based on agreement between applicant and MPWMD	See Master Response MR-PSU-2 in Chapter 2.
37.05	03/22/04	Organization	DMFPO	Transportation and Circulation	Highway 68	Should be implemented as soon as possible.	See Master Response MR-TC-1 in Chapter 2.
37.06	03/22/04	Organization	DMFPO	Introduction	Refined Alternative 2	Mention that Area MNOLUV is prior environmentally superior alternative	37.06
37.07	03/22/04	Organization	DMFPO	Public Services and Utilities	Parks, Recreation, and Open Space	Safety of Green-Red Trail access to ocean should be improved	See Master Response MR-PSU-3 in Chapter 2.
37.08	03/22/04	Organization	DMFPO	Public Services and Utilities	Parks, Recreation, and Open Space	Access to trails during construction should be provided	See Master Response MR-PSU-3 in Chapter 2.
37.09	03/22/04	Organization	DMFPO	Land Use	Proposed Golf Course	Wants language about benefits of more golf capacity	37.09
37.10	03/22/04	Organization	DMFPO	Land Use	Measure A	Wants language referencing voter approval of Measure A	See Master Response MR-LU-1 in Chapter 2.
37.11	03/22/04	Organization	DMFPO	Biology	HHNA	Increased equestrian use may reduce bike damage	See Master Response MR-BIO-4 in Chapter 2.
37.12	03/22/04	Organization	DMFPO	Biology	HHNA	Increased equestrian use will reduce mechanical trail maintenance	See Master Response MR-BIO-4 in Chapter 2.
37.13	03/22/04	Organization	DMFPO	Biology	HHNA	Increased equestrian use will only result in slight increase in erosion and will be offset by reduction of bicycle/motorized bike use	See Master Response MR-BIO-4 in Chapter 2.
37.14	03/22/04	Organization	DMFPO	Biology	HHNA	Closure of social trails is of limited usefulness; trails for hiking and pedestrians only.	See Master Response MR-BIO-4 in Chapter 2.
37.15	03/22/04	Organization	DMFPO	Biology	Weed-free feed	No supply of such feed locally, unreasonable, unnecessary, other measures effective	See Master Response MR-BIO-4 in Chapter 2.
37.16	03/22/04	Organization	DMFPO	Biology	HHNA	Temporary closures should be coordinated with PBEC and PBRTA	See Master Response MR-BIO-4 in Chapter 2.
37.17	03/22/04	Organization	DMFPO	Biology	HHNA	Closure of single-track segments not necessary to mitigate impact of increased use	See Master Response MR-BIO-4 in Chapter 2.
37.18	03/22/04	Organization	DMFPO	Biology	HHNA	Recommend deletion of use of Congress Road as trail connector and connection of lower Sawmill site to last part of Red-Green trail.	See Master Response MR-BIO-4 in Chapter 2.
37.19	03/22/04	Organization	DMFPO	Biology	Monterey pine forest	Forest values as stated in General Plan Update+F257 should be mentioned	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
37.20	03/22/04	Organization	DMFPO	Biology	Wetlands	Sawmill wetlands are man-made due to poor grading and not ESHA and should be regraded	See Master Response MR-BIO-3 in Chapter 2.

Table 5-2  
PBC DMF/PDP DEIR Comments  
By Author

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
37.21	03/22/04	Organization	DMFPO	Biology	Bristol Curve	Mitigation to use Bristol Curve is inappropriate, causes disruption to residences, and not needed to mitigate impact to YP	See Master Response MR-BIO-7 in Chapter 2.
37.22	03/22/04	Organization	DMFPO	Biology	Dune habitat and species	Mitigation not needed because SBB never seen.	See Master Response MR-BIO-2 in Chapter 2.
37.23	03/22/04	Organization	DMFPO	Biology	Dune habitat and species	Mitigation should be contingent on positive SBB sighting	See Master Response MR-BIO-2 in Chapter 2.
37.24	03/22/04	Organization	DMFPO	Biology	Sensitive species and habitats	Mitigation for other sensitive wildlife should be contingent upon presenceshould be contingent on positive sighting	37.24
37.25	03/22/04	Organization	DMFPO	Hydrology and Water Quality	Manure management	Change to "appropriate" facility	See Master Response MR-HWQ-1 in Chapter 2.
37.26	03/22/04	Organization	DMFPO	Public Services and Utilities	Gas and electric utilities	Mitigation should also apply to gas and electric service utilities	37.26
37.27	03/22/04	Organization	DMFPO	Public Services and Utilities	Electric utilities	Not mentioned in document; should be underground	Comment noted
37.28	03/22/04	Organization	DMFPO	Transportation and Circulation	Circulation	Support 4-way stop at Alva/Ondulado and off-road trail for use of peds, equestrians	Comment noted
37.29	03/22/04	Organization	DMFPO	Aesthetics	Visual character	Subdivision K would be out of character and incompatible and a significant aesthetic impact, should be dedicated, not subdivided, and the trail system retained.	37.29
37.30	03/22/04	Organization	DMFPO	Transportation and Circulation	Construction	Construction traffic should emphasize use of Lopez Road/Haul Road for egress	See Master Response MR-TC-2 in Chapter 2.
37.31	03/22/04	Organization	DMFPO	Transportation and Circulation	Circulation	Support 120-foot stacking lane on SFB Morse at New EQC	37.31
37.32	03/22/04	Organization	DMFPO	Transportation and Circulation	Circulation	Congress Road improvements should be built early in construction cycle along with Red Trail safety improvements.	Comment noted
37.33	03/22/04	Organization	DMFPO	Biology	Dune habitat and species	Relocation of EQC to Sawmill should reduce recreational impact on Signal Hill dune and SBB habitat.	See Master Response MR-BIO-2 in Chapter 2.
37.34	03/22/04	Organization	DMFPO	Transportation and Circulation	Construction	Congress/Lopez construction safety should be assessed	See Master Response MR-TC-2 in Chapter 2.
72.01	03/22/04	Organization	HOPE	Biology	ESHA definition	DEIR refuses to acknowledge and protect YP habitat, CRLF habitat, Monterey pine and MPF ecosystems as ESHA	See Master Response MR-BIO-1 in Chapter 2.
72.02	03/22/04	Organization	HOPE	Biology	Monterey pine forest	DEIR does not recognize destruction of MPF ecosystems as irreversible and irreplaceable, significant and unmitigable.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
72.03	03/22/04	Organization	HOPE	Biology	Impact Assessment Methodology	DEIR relies on reports paid for by PBC including Huffman report	72.03
72.04	03/22/04	Organization	HOPE	Noise	Construction	DEIR ignores chainsaws and chippers and requires DEIR recirculation; anything over 85 dBA is "illegal", anything over 55 dBA is significant. Chainsaws also cause air pollution; noise impact on wildlife not assessed.	72.04
72.05	03/22/04	Organization	HOPE	Alternatives	Range of Alternatives	DEIR fails to adequately evaluate offsite golf course alternatives	See Master Response MR-ALT-1 in Chapter 2.
72.06	03/22/04	Organization	HOPE	Public Services and Utilities	Water Supply and Demand	DEIR does not use correct baseline for water use analysis	See PRDEIR and Master Response for Public Services MR-PSU-2 in Chapter 2
73.000	03/22/04	Organization	HOPE	516 Issues	516 Issues	DEIR is "monstrously defective". Comment List 516 issues that it suggests may be deficiencies of the document.	See Chapter 7.
96.01	04/08/04	Organization	HOPE	Land Use	Measure A	Alleges legal procedural problem with County approval of project before Measure A certified by CCC.	See Master Response MR-LU-1 in Chapter 2.
96.02	04/08/04	Organization	HOPE	CEQA	CEQA Process	Suggests subdivision committee cannot proceed without Final EIR.	See Master Response MR-GEN-2 in Chapter 2.
96.03	04/08/04	Organization	HOPE	Noise	Construction	Alleges project could violate County noise ordinance and concern over lack of mention of woodchippers and chainsaws.	96.03
96.04	04/08/04	Organization	HOPE	Transportation and Circulation	Highway 68	Alleges project would violate County traffic standards.	96.04
96.05	04/08/04	Organization	HOPE	Public Services and Utilities	Water Supply and Demand	Alleges project would violate County water standards.	See Master Response MR-PSU-2 in Chapter 2.
96.06	04/08/04	Organization	HOPE	CEQA	CEQA Process	Suggests subdivision committee not proceed until Measure A is acted on by CCC and Final EIR released.	See Master Response MR-GEN-2 and MR-LU-1 in Chapter 2.
96.07	04/08/04	Organization	HOPE	Land Use	Measure A	Provides quotes from CCC letter regarding the DEIR	See responses to Agency Comments
96.08	04/08/04	Organization	HOPE	CEQA	CEQA Process	Suggests that resource agency comments require substantial revision and recirculation of the DEIR.	See responses to Agency Comments
96.09	04/08/04	Organization	HOPE	Biology	Monterey pine forest	Quotes DFG and CCC concerning impacts to MPF	See responses to Agency Comments
96.10	04/08/04	Organization	HOPE	Public Services and Utilities	Water Supply and Demand	Quotes DFG , CCC, SWRCB, and MPWMD concerning water supply impacts.	See Master Response MR-PSU-2 in Chapter 2.
96.11	04/08/04	Organization	HOPE	Biology	Monterey pine forest	Quotes CCC concerning opinion that MPF is ESHA.	See responses to Agency Comments
96.12	04/08/04	Organization	HOPE	Public Services and Utilities	Water Supply and Demand	Quoted DFG concerning water demand impacts on Carmel River resources	See Master Response MR-PSU-2 in Chapter 2.
96.13	04/08/04	Organization	HOPE	Land Use	LCP buildout	Quotes CCC concern regarding potential buildout.	See responses to Agency Comments
96.14	04/08/04	Organization	HOPE	Biology	Yadon's piperia	Quotes DFG and CCC concerning Yadon's piperia.	See Master Response MR-BIO-6 in Chapter 2.
96.15	04/08/04	Organization	HOPE	Land Use	Spanish Bay permit conditions and Sawmill easements	Quoted DFG concerning removal of Sawmill easements.	See responses to Agency Comments
96.16	04/08/04	Organization	HOPE	Land Use	Measure A	Quotes CCC regarding processing of project approval and Measure A.	See responses to Agency Comments
29.01	03/19/04	Organization	Independent Reclaimed Water Users Group	Public Services and Utilities	Water Supply and Demand	IRWUG believes MPWMD will not allow use of potable water for new golf course; requests that Phase II be completed prior to completion of the new golf course; believes unless this is done impact is not mitigated	See Master Response MR-PSU-2 in Chapter 2.
7.01	02/20/04	Organization	LWV	Land Use	Policy Consistency	Project is not consistent with the Forestry and Soil Resources Element of the LCP	7.01
7.02	02/20/04	Organization	LWV	Mitigation Monitoring	Enforcement	Monitoring programs are inadequate and problematic	See Master Response MR-GEN-3 in Chapter 2.
7.03	02/20/04	Organization	LWV	Public Services and Utilities	Water Supply and Demand	Questions basis of PBC entitlement, effect of Phase 2 proposal, interim project impact on Carmel River	See Master Response MR-PSU-2 in Chapter 2.
7.04	02/20/04	Organization	LWV	Air Quality	Construction	Impacts on residential community (such as construction diesel exhaust) not adequately addressed.	7.04
7.05	02/20/04	Organization	LWV	Statement	Statement	Project will result in reduction of residential property values and systemic degradation of the forest	Comment noted
7.06	02/20/04	Organization	LWV	Biology	Monterey pine forest	Impacts to Monterey Pine Forest cannot be mitigated	See Master Response MR-BIO-5 in Chapter 2.
7.07	02/20/04	Organization	LWV	Biology	Monterey pine forest	CCC recommendations regarding Monterey Pine Forest should be considered	See Master Response MR-BIO-5 in Chapter 2.
7.08	02/20/04	Organization	LWV	Land Use	Measure A	Measure A should be certified before hearing on project	See Master Response MR-LU-1 in Chapter 2.
47.01	03/22/04	Organization	MPFW	Statement	Statement	Overview of letter and issues (process, information gaps, extent and nature of impacts, mitigation adequacy)	Comment noted
47.02	03/22/04	Organization	MPFW	Land Use	Measure A	Question appropriateness of considering application before Measure A certification	See Master Response MR-LU-1 in Chapter 2.
47.03	03/22/04	Organization	MPFW	Biology	ESHA definition	Disagree with County definition of ESHA in DEIR	See Master Response MR-BIO-1 in Chapter 2.
47.04	03/22/04	Organization	MPFW	Biology	Monterey pine forest	Impacts should be assessed in light of geomorphic composition and ecological associations.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
47.05	03/22/04	Organization	MPFW	Biology	Maritime chaparral	Should be mapped in DMF to identify impacts	47.05

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
47.06	03/22/04	Organization	MPFW	Biology	Monterey pine forest	Edge effects are inadequately addressed in impact analysis and mitigation	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
47.07	03/22/04	Organization	MPFW	Biology	Monterey pine forest	Edge effects at Area B and C not adequately addressed	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
47.08	03/22/04	Organization	MPFW	Biology	Monterey pine forest	Edge effects, human use, and domestic pets/feral cat impacts of developing Sawmill site not adequately addressed.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
47.09	03/22/04	Organization	MPFW	Biology	Monterey pine forest	Sawmill site was supposed to be preserved as buffer, but is now proposed as intens use	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
47.10	03/22/04	Organization	MPFW	Biology	Monterey pine forest	Edge effects at Area PQR not adequately addressed	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
47.11	03/22/04	Organization	MPFW	Biology	Monterey pine forest	Edge effects at Area F2 and F3 not adequately addressed	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
47.12	03/22/04	Organization	MPFW	Biology	Dune habitat and species	Edge effects at Signal Hill not adequately addressed	See Master Response MR-BIO-2 in Chapter 2.
47.13	03/22/04	Organization	MPFW	Biology	Monterey pine forest	Cumulative analysis inadequate because fails to assess DMF scale effects of historical forest loss; 5% should not only be applied on local population level	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
47.14	03/22/04	Organization	MPFW	Biology	Tree Removal	Context of tree removal inadequately addressed; loss of unique forest type at Area B and C; loss of oaks at Area B and C inadequately addressed.	47.14
47.15	03/22/04	Organization	MPFW	Format	Format	Scattered mitigation material is ineffectual in demonstrating less than significant impacts	47.15
47.16	03/22/04	Organization	MPFW	Biology	Resource Management Plans	RMPs have not been completed, reviewed, or approved and thus are not basis to assume can mitigate impacts to less than significant level.	See Master Response MR-BIO-9 in Chapter 2.
47.17	03/22/04	Organization	MPFW	Mitigation Monitoring	Enforcement	Implementation, enforcement, funding, monitoring work, remedial work, responsibility	See Master Response MR-GEN-3 and MR-BIO-9 in Chapter 2.
47.18	03/22/04	Organization	MPFW	Biology	Tree Removal	Mitigation I-1 could undermine natural selection; additional dedication should be proposed instead such as Aguajito site.	47.18
47.19	03/22/04	Organization	MPFW	Biology	Yadon's piperia	TEAM plan is experimental, untested, unsounds, and inadequate to offset impacts to less than significant.	See Master Response MR-BIO-6 in Chapter 2.
47.20	03/22/04	Organization	MPFW	Biology	HHNA	Mitigation (weed-free feed and environmental education) are speculative, impacts are unmitigable; avoidance is recommended by not locating new EQC at Sawmill site.	See Master Response MR-BIO-4 in Chapter 2.
47.21	03/22/04	Organization	MPFW	Hydrology and Water Quality	Manure management	Dubious about effectiveness of mitigation	See Master Response MR-HWQ-1 in Chapter 2.
47.22	03/22/04	Organization	MPFW	Biology	Pallid Bat	Mitigation is speculative.	47.22
47.23	03/22/04	Organization	MPFW	Statement	Statement	Does not believe impacts are mitigated to less than significant, nor analysis/mitigation founded on sound scientific basis, no demonstrated economic or legal commitment to permit compliance	Comment noted
47.24	03/22/04	Organization	MPFW	Alternatives	Range of Alternatives	Suggests alternative as 9-hole expansion, no relocation of EQC, preserve Area C, driving range in lower Sawmill, no residential lots in PQR or F-3, move of SB employee housing to disturbed part of site, visitor serving as proposed, other residential as proposed, additional preservation at Aguajito.	See Master Response MR-ALT-1 in Chapter 2.
47.25	03/22/04	Organization	MPFW	Biology	Monterey pine forest	GIS map of loss of undeveloped pine forest 1994 to 2002 shows loss of 1,100 acres with remaining amount of 8,300 acres	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
102.01	06/10/04	Organization	MPFW	Biology	Monterey pine forest	Provides clarification of methodology and intent of MPFW mapping of Monterey pine forest. Notes ongoing loss of Monterey pine forest. Suggests that erring on the side of caution when considering further development in the forest.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
104.01	06/23/04	Organization	Oak Hills Homeowner's Association Members	Transportation and Circulation	Intersections outside the DMF	Concern over project impact on SR 156.	See Master Response MR-TC-3 in Chapter 2.
104.02	06/23/04	Organization	Oak Hills Homeowner's Association Members	Transportation and Circulation	Intersections outside the DMF	Suggests fair-share impact fee mitigation for improvements to SR 156 and/or freeway between Highway 1 and 101.	See Master Response MR-TC-3 in Chapter 2.
104.03	06/23/04	Organization	Oak Hills Homeowner's Association Members	Transportation and Circulation	Special Events	Suggest a special event per-car parking fee as mitigation.	104.03
104.04	06/23/04	Organization	Oak Hills Homeowner's Association Members	Transportation and Circulation	Intersections outside the DMF	Suggests impact fees be used for specific improvements exclusively.	See Master Response MR-TC-3 in Chapter 2.
104.05	06/23/04	Organization	Oak Hills Homeowner's Association Members	Transportation and Circulation	Intersections outside the DMF	Supports impact fees and other means of funding specific improvements to SR 156.	See Master Response MR-TC-3 in Chapter 2.
27.01	03/18/04	Organization	OSAC	Biology	Resource Management Plans	OSAC requests to be involved in review and refinement of Resource Management Plans	See Master Response MR-BIO-9 in Chapter 2.
27.02	03/18/04	Organization	OSAC	Biology	Resource Management Plans	Consistency in maintenance standards should be goal of RMP review	See Master Response MR-BIO-9 in Chapter 2.
66.01	03/22/04	Organization	PBEC	Biology	Wetlands	Sawmill wetlands are man-made and site should be regraded to allow full recreation use.	See Master Response MR-BIO-3 in Chapter 2.
66.02	03/22/04	Organization	PBEC	Biology	HHNA	Restriction of equestrian use of trails is not necessary; bikes and motorbikes cause the damage; increased horse usage will displace bike usage and damage will be reduced.	See Master Response MR-BIO-4 in Chapter 2.
66.03	03/22/04	Organization	PBEC	Hydrology and Water Quality	Manure management	Change requirement for manure to be placed at an "appropriate" (not "approved") facility	See Master Response MR-HWQ-1 in Chapter 2.
66.04	03/22/04	Organization	PBEC	Biology	Weed-free feed	Weed-free feed is not available locally; cost prohibitive; impossible to monitor; other mitigation sufficient for invasives.	See Master Response MR-BIO-4 in Chapter 2.
35.01	03/22/04	Organization	PBRTA	Biology	Wetlands	Avoidance of man-made wetlands at Sawmill site degrades New EQC capability; alternatives should be developed to allow full use of site.	See Master Response MR-BIO-3 in Chapter 2.
35.02	03/22/04	Organization	PBRTA	Transportation and Circulation	Highway 68	Add language to note beneficial impact of Phase 1B improvements at Highway 1/68.	35.02
35.03	03/22/04	Organization	PBRTA	Public Services and Utilities	Parks, Recreation, and Open Space	Improve Green/Red Trail to facilitate safe access to the ocean from new EQC.	See Master Response MR-PSU-3 in Chapter 2.
35.04	03/22/04	Organization	PBRTA	Public Services and Utilities	Parks, Recreation, and Open Space	Maintain trail access during GC construction.	See Master Response MR-PSU-3 in Chapter 2.
35.05	03/22/04	Organization	PBRTA	Biology	HHNA	Most soil and vegetation disturbance is due to mountain bike and motorized bikes in HHNA; Equestrian use would result in less damage by discouraging and perhaps displacing bike usage.	See Master Response MR-BIO-4 in Chapter 2.
35.06	03/22/04	Organization	PBRTA	Biology	HHNA	More frequent equestrian use will help to maintain trails	See Master Response MR-BIO-4 in Chapter 2.
35.07	03/22/04	Organization	PBRTA	Biology	HHNA	Increased equestrian use will only result in slightly increased erosion and will be offset by reduction in damage from displaced bike usage.	See Master Response MR-BIO-4 in Chapter 2.

Table 5-2  
PBC DMF/PDP DEIR Comments  
By Author

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
35.08	03/22/04	Organization	PBRTA	Biology	HHNA	Restoration of social trails in HHNA is unlikely to be successful.	See Master Response MR-BIO-4 in Chapter 2.
35.09	03/22/04	Organization	PBRTA	Biology	Weed-free feed	No known supply of certified noxious weed-free feed in local area, and requirement unnecessary and unreasonable and redundant with other mitigation.	See Master Response MR-BIO-4 in Chapter 2.
35.10	03/22/04	Organization	PBRTA	Biology	HHNA	Temporary trail closure should be coordinated with PBEC and PBRTA.	See Master Response MR-BIO-4 in Chapter 2.
35.11	03/22/04	Organization	PBRTA	Biology	HHNA	Closure of single-track trail unwarranted due to minimal increase in usage and maintenance.	See Master Response MR-BIO-4 in Chapter 2.
35.12	03/22/04	Organization	PBRTA	Biology	HHNA	Trail continuity language should not include Congress Road as trail segment due to safety.	See Master Response MR-BIO-4 in Chapter 2.
35.13	03/22/04	Organization	PBRTA	Biology	Wetlands	Wetland S-A is not ESHA and is man-made; site should be regraded to allow entire site for equestrian use.	See Master Response MR-BIO-3 in Chapter 2.
35.14	03/22/04	Organization	PBRTA	Biology	Dune habitat and species	Mitigation is not needed for SBB because it has never been sighted in DMF.	See Master Response MR-BIO-2 in Chapter 2.
35.15	03/22/04	Organization	PBRTA	Biology	Dune habitat and species	SBB mitigation should be contingent on positive sighting of SBB.	See Master Response MR-BIO-2 in Chapter 2.
35.16	03/22/04	Organization	PBRTA	Biology	Sensitive species and habitats	Mitigation for other sensitive wildlife should be contingent upon presence	35.16
35.17	03/22/04	Organization	PBRTA	Hydrology and Water Quality	Manure management	Change requirement for manure to be placed at an "appropriate" (not "approved") facility	See Master Response MR-HWQ-1 in Chapter 2.
35.18	03/22/04	Organization	PBRTA	Transportation and Circulation	Circulation	Support 4-way stop at Alva/Ondulado and off-road trail as shown on Figure 2.0-32.	Comment noted
35.19	03/22/04	Organization	PBRTA	Aesthetics	Visual character	Subdivision K would be out of character and incompatible and a significant aesthetic impact, should be dedicated, not subdivided, and the trail system retained.	35.19
35.20	03/22/04	Organization	PBRTA	Transportation and Circulation	DMF Gates	Support 120-foot stacking lane on SFB Morse at New EQC.	Comment noted
35.21	03/22/04	Organization	PBRTA	Transportation and Circulation	Circulation	Congress Road improvements should be built early in construction cycle along with Red Trail safety improvements.	Comment noted
35.22	03/22/04	Organization	PBRTA	Biology	Dune habitat and species	Relocation of EQC to Sawmill should reduce recreational impact on Signal Hill dune and SBB habitat.	See Master Response MR-BIO-2 in Chapter 2.
43.01	03/22/04	Organization	RSBA	Statement	Statement	Concerned about traffic, visual aesthetics, pedestrian/vehicular safety, construction, cumulative impacts	Comment noted
43.02	03/22/04	Organization	RSBA	Statement	Statement	Discussed concerns with applicant: 2nd access point, stopsigns/traffic calming, parking, entryway, tennis courts, construction access, Congress Road, construction issues, landscaping, emergency access.	Comment noted
106.01	08/16/04	Organization	RSBA	Transportation and Circulation	Multiple Issues	Itemizes 8 concerns covered in letter	Comment noted
106.02	08/16/04	Organization	RSBA	Transportation and Circulation	DMF traffic	Suggests project will cause congestion with single-entry to Spanish Bay at Congress. Suggests a permanent second access road to Spanish Bay Inn at mitigation.	106.02
106.03	08/16/04	Organization	RSBA	Transportation and Circulation	Special Events	States that special events will continue to affect traffic. Suggests special event plan should be developed along with management activities.	106.03
106.04	08/16/04	Organization	RSBA	Transportation and Circulation	Construction	Describes project impacts during construction. Requests construction plans be submitted to RSBA for review and comment and establishment of a construction management plan and meetings before and during construction with residents.	106.04
106.05	08/16/04	Organization	RSBA	Transportation and Circulation	Parking	Requests a detailed Parking Management Plan.	106.05
106.06	08/16/04	Organization	RSBA	Transportation and Circulation	Circulation	Suggests elimination of mid-block crossing of 17-mile Drive.	106.06
106.07	08/16/04	Organization	RSBA	Transportation and Circulation	DMF traffic	Supports 4-way stop and other improvements at 17-mile Drive/Congress.	106.07
106.08	08/16/04	Organization	RSBA	Transportation and Circulation	Circulation	Requests opportunity to review and comment on circulation/road design plans and special event plans.	106.08
106.09	08/16/04	Organization	RSBA	CEQA	CEQA Process	Suggest revision of the DEIR, recirculation if necessary, or responses in the FEIR.	See Master Response MR-GEN-2 in Chapter 2.
106.10	08/16/04	Organization	RSBA	CEQA	CEQA Process	Suggests some of the DEIR is programmatic and not detailed enough.	106.10
106.11	08/16/04	Organization	RSBA	CEQA	CEQA Process	Suggests the project may be being piecemealed due to series of actions and documents, and may underestimate the magnitude of impacts.	See Master Response MR-GEN-2 in Chapter 2.
106.12	08/16/04	Organization	RSBA	CEQA	CEQA Process	Suggests additional CEQA review is required for certain approvals and plans.	See Master Response MR-GEN-2 in Chapter 2.
106.13	08/16/04	Organization	RSBA	CEQA	CEQA Process	Suggests there are technical and organizational flaws that should be corrected.	See Master Response MR-GEN-2 in Chapter 2.
106.14	08/16/04	Organization	RSBA	Transportation and Circulation	Multiple Issues	Provides list of eight issues of concern.	Comment noted
106.15	08/16/04	Organization	RSBA	Project Description	Statement	Summarized relevant parts of project description.	Comment noted
106.16	08/16/04	Organization	RSBA	Statement	Statement	Summarizes relevant analysis in the DEIR for a number of subjects.	Comment noted
106.17	08/16/04	Organization	RSBA	Aesthetics	Visual character	Suggests more precise elevation drawings, landscape plans, architectural specifications, or technical simulations may need to be reviewed before consensus on less than significant can be agreed upon.	106.17
106.18	08/16/04	Organization	RSBA	Transportation and Circulation	DMF traffic	Summarizes DEIR information on certain traffic elements.	Comment noted
106.19	08/16/04	Organization	RSBA	Transportation and Circulation	Circulation	Suggests elimination of mid-block crossing of 17-mile Drive and consideration of an underground crossing at Congress.	106.19
106.20	08/16/04	Organization	RSBA	Transportation and Circulation	Parking	Suggests a detailed Parking Plan for the Inn at Spanish Bay.	106.20
106.21	08/16/04	Organization	RSBA	Transportation and Circulation	Circulation	Suggest addition of second access road to Inn and that County provide RSBA with opportunity to comment on the draft plans for new entrance and gate facility.	106.21
106.22	08/16/04	Organization	RSBA	Transportation and Circulation	Circulation	Requests County provide RSBA opportunity to comment on draft plans for driveway to Spanish Bay Employee housing and Congress Road improvements.	Comment noted
106.23	08/16/04	Organization	RSBA	Transportation and Circulation	Special Events	Summarizes DEIR information on special event traffic.	Comment noted
106.24	08/16/04	Organization	RSBA	Transportation and Circulation	Construction	Requests County provide RSBA opportunity to comment on detailed construction plans, establishment of a construction management committee, and require contractor to include specific information.	106.24
106.25	08/16/04	Organization	RSBA	Air Quality	Construction and Long-Term Emissions	Summarizes DEIR information	Comment noted
106.26	08/16/04	Organization	RSBA	Noise	Construction	Suggests there may be additional mitigation measures for cleanup activities following construction.	106.26
106.27	08/16/04	Organization	RSBA	Cultural Resources	General	Summarizes DEIR information	Comment noted
106.28	08/16/04	Organization	RSBA	CEQA	CEQA Process	Suggests some of the DEIR is programmatic and not detailed enough.	See Master Response MR-GEN-2 in Chapter 2.
106.29	08/16/04	Organization	RSBA	Land Use	Measure A	Expresses concern that subsequent CEQA analysis is needed and compliance of project with the LCP and potential changes relative to Measure A.	See Master Response MR-LU-1 in Chapter 2.
106.30	08/16/04	Organization	RSBA	Land Use	Spanish Bay permit condition and Sawmill easements	States that amendments to conditions must be identified now.	See Master Response MR-LU-2 in Chapter 2.
106.31	08/16/04	Organization	RSBA	Biology	Resource Management Plans	Suggests RMP approval is discretionary; request authorizing language.	See Master Response MR-BIO-9 in Chapter 2.
106.32	08/16/04	Organization	RSBA	Land Use	Measure A	Requests clarification of allowable visitor-serving units at Spanish Bay	See Master Response MR-LU-1 in Chapter 2.
106.33	08/16/04	Organization	RSBA	Format	Format	Suggest a glossary should be added.	See Master Response MR-GEN-1 in Chapter 2.
106.34	08/16/04	Organization	RSBA	Land Use	LCP	DEIR should provide a map of Coastal Zone.	106.34
106.35	08/16/04	Organization	RSBA	Other	General	Asks if engineering report recommendations have been added as conditions.	106.35
106.36	08/16/04	Organization	RSBA	Biology	Resource Management Plans	Suggest RMP approval is discretionary and subject to CEQA and the MMRP should be circulated more broadly.	See Master Response MR-BIO-9 in Chapter 2.
106.37	08/16/04	Organization	RSBA	Mitigation Monitoring	MMRP	Suggest MMRP should identify approach if mitigations not working.	See Master Response MR-GEN-3 in Chapter 2.
106.38	08/16/04	Organization	RSBA	Other	Significant Irreversible Environmental Changes	Suggests Measure A context should be added.	106.38
106.39	08/16/04	Organization	RSBA	Other	Significant Irreversible Environmental Changes	Suggests clarification of language regarding air quality impacts	106.39

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
106.40	08/16/04	Organization	RSBA	Air Quality	Long-Term emissions	Requests clarification of source re: AQMP consistency and states lack of list of person's consulted.	106.40
106.41	08/16/04	Organization	RSBA	Process	CEQA	Notes lack of detail re: Air Quality 3.e in Initial Study of why no impact determined and suggests other reasons for dismissal of impact consideration may exist.	106.41
106.42	08/16/04	Organization	RSBA	Format	Format	Suggests existing setting should come before impact analysis and baseline should be clarified.	See Master Response MR-GEN-1 in Chapter 2.
106.43	08/16/04	Organization	RSBA	Executive Summary	Format	Suggests regulatory setting and Intended Uses of the EIR should be summarized in the Executive Summary.	See Master Response MR-GEN-1 in Chapter 2.
62.01	03/22/04	Organization	RVWDW	Biology	Monterey pine forest	Consider CCC periodic review findings and protect forest.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
62.02	03/22/04	Organization	RVWDW	Alternatives	Range of Alternatives	Employee housing and recreation incompatible; impact on dogs; move employee housing to Corp. Yard; preserve Area B and C.	See Master Response MR-ALT-1 in Chapter 2.
62.03	03/22/04	Organization	RVWDW	Biology	Monterey pine forest	Explain how loss of forest is less than significant.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
62.04	03/22/04	Organization	RVWDW	Biology	HHNA	Concerns regarding invasive species, nutrients, new trails	See Master Response MR-BIO-4 in Chapter 2.
62.05	03/22/04	Organization	RVWDW	Hydrology and Water Quality	Manure management	Control of nutrient runoff; fire emergency evacuation of EQC	See Master Response MR-HWQ-1 in Chapter 2 and Response 62.05 in Chapter 5.
62.06	03/22/04	Organization	RVWDW	Public Services and Utilities	Emergency Access	Fire emergency evacuation of EQC	62.06
62.07	03/22/04	Organization	RVWDW	Aesthetics	Visual character	More simulations are needed from trail and residential views and Highway 68.	62.07
62.08	03/22/04	Organization	RVWDW	Biology	Light pollution	Light pollution impact on preservation areas	62.08
62.09	03/22/04	Organization	RVWDW	Public Services and Utilities	Water Supply and Demand	What about drought years? Fair treatment for access to water; emergency water plans for drought.	See Master Response MR-PSU-2 in Chapter 2.
62.10	03/22/04	Organization	RVWDW	Transportation and Circulation	Intersections outside the DMF	Traffic study conclusion on DLI closure wrong; How will impacts to Pacific Grove, Monterey, Highway 68, Lighthouse, 17-mile gate, SFB Morse Gate, Haul Road, Highway 1 be addressed? Overpass to Highway 1 better idea. Problems with passing at SFB Morse intersection.	62.10
62.11	03/22/04	Organization	RVWDW	Transportation and Circulation	Construction	Construction traffic should be 9:30 am to 3:00 pm. Construction impact on DMF gates, Highway 68 and Pacific Grove.	See Master Response MR-TC-2 in Chapter 2.
62.12	03/22/04	Organization	RVWDW	Transportation and Circulation	Special Events	Supports carpooling plan for special events.	62.12
62.13	03/22/04	Organization	RVWDW	Transportation and Circulation	Emergency Access	Need emergency plan for evacuation	62.13
62.14	03/22/04	Organization	RVWDW	Air Quality	Construction	Construction traffic impact on Pacific Grove, diesel fumes, suggest air monitoring stations and website; shut trucks when waiting for fillup; problem-solving during construction.	62.14
62.15	03/22/04	Organization	RVWDW	Process	Construction	What is the mechanism for the public to address traffic, noise, air, water pollution problems and get problems solved?	62.15
62.16	03/22/04	Organization	RVWDW	Statement	Statement	DMF is special place, not against development, but want development grouped in areas of cleared habitat, and built at sustainable scale.	Comment noted
83.01	03/25/04	Organization	SFHA	Transportation and Circulation	Highway 68	Note that Skyline Forest Drive is classified as a local collector, not a minor arterial.	Comment noted
83.02	03/25/04	Organization	SFHA	Transportation and Circulation	Highway 68	DEIR is inadequate re: Skyline Forest Drive. DEIR proposes to accommodate traffic with a signal rather than mitigate by improvements at Highway 1 gate and upgrades to Pebble Beach road network.	See Master Response MR-TC-1 in Chapter 2.
83.03	03/25/04	Organization	SFHA	Transportation and Circulation	Highway 68	Takes issue that no project traffic will be added to Skyline Forest Drive and that signal is needed due to lack of spacing, spacing provided by red time on CHOMP signal. Signal will exacerbate slow speeds, making bypass through neighborhoods more likely.	See Master Response MR-TC-1 in Chapter 2.
83.04	03/25/04	Organization	SFHA	Transportation and Circulation	Highway 68	Asks for alternatives for at-grade Highway 68 connection between CHOMP and Beverly over Skyline Drive	See Master Response MR-TC-1 in Chapter 2.
83.05	03/25/04	Organization	SFHA	Transportation and Circulation	Highway 68	Current MST bus stops on Holman Highway should be relocated to CHOMP, as it will eliminate need for signalized pedestrian crossings when widened.	83.05
83.06	03/25/04	Organization	SFHA	Transportation and Circulation	Highway 68	Highway 1/68 improvements will accomplish little except facilitating access to Pebble Beach at expense of 68 traffic, which will further encourage bypass traffic.	See Master Response MR-TC-1 in Chapter 2.
83.07	03/25/04	Organization	SFHA	Transportation and Circulation	Highway 68	Alternatives analysis is inadequate because it does not consider grade-separation at Highway 1/68/17-Mile Drive intersection that would truly mitigate traffic impacts and greatly reduce red time on the off-ramp signal. Alternative would be consistent with PSR which states that a 4-lane bridge with a below grade entry to Pebble Beach is the ultimate solution.	See Master Response MR-TC-1 in Chapter 2.
83.08	03/25/04	Organization	SFHA	Transportation and Circulation	Highway 68	Challenge DEIR Conclusion in Chapter 4.4 that claims to mitigate traffic impacts by adding two signals and contributing to widening of Holman between CHOMP and Highway 1.	See Master Response MR-TC-1 in Chapter 2.
76.01	03/22/04	Organization	Sierra Club (Frank P. Angel)	Land Use	Policy Consistency	DEIR fails to assess project impacts under the public access and other coastal resources planning and management policies of the Coastal Act	See Master Response MR-LU-1 in Chapter 2.
76.02	03/22/04	Organization	Sierra Club (Frank P. Angel)	Biology	Monterey pine forest	DEIR does not consider geomorphic surfaces and does not disclose what percentage of forest loss in the DMF itself.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
76.03	03/22/04	Organization	Sierra Club (Frank P. Angel)	Biology	Monterey pine forest	Preservation and conservation areas do not represent mitigation, but baseline.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
76.04	03/22/04	Organization	Sierra Club (Frank P. Angel)	Alternatives	Range of Alternatives	DEIR does not analyze a preserve/parkland alternative	See Master Response MR-ALT-1 in Chapter 2.
76.05	03/22/04	Organization	Sierra Club (Frank P. Angel)	Land Use	Measure A Policy Consistency	DEIR presumes Measure A certification without substantial evidence. Project cannot be approved prior to Measure A certification. DEIR does not disclose inconsistency with Policy 124, DEIR does not assess public access impacts of losing existing trails.	See Master Response MR-LU-1 and MR-LU-3 in Chapter 2.
76.06	03/22/04	Organization	Sierra Club (Frank P. Angel)	Land Use	Spanish Bay permit conditions and Sawmill easements	DEIR inadequately reviews impact of Spanish Bay permit conditions and easements amendment of prior mitigation sets bad precedent for current mitigation of dedications	See Master Response MR-LU-2 in Chapter 2.
76.07	03/22/04	Organization	Sierra Club (Frank P. Angel)	Hydrology and Water Quality	Pesticides and Fertilizers	DEIR inadequately assess pesticide and fertilizer direct and cumulative impacts on ecosystem resources; insufficient detail; inadequate assessment of impact on human health.	76.07
76.08	03/22/04	Organization	Sierra Club (Frank P. Angel)	Biology	ESHA definition	DEIR fails to recognize MPF as ESHA	See Master Response MR-BIO-1 in Chapter 2.
76.08	03/22/04	Organization	Sierra Club (Frank P. Angel)	Biology	Monterey pine forest	Evidence that undeveloped MPF is 8290 acres	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
76.10	03/22/04	Organization	Sierra Club (Frank P. Angel)	Biology	Resource Management Plans	Have PVAs been done? RMPs should be based on PVAs.	See Master Response MR-BIO-9 in Chapter 2.
76.11	03/22/04	Organization	Sierra Club (Frank P. Angel)	Biology	Seasonal pond	What is buffer for seasonal pond?	76.11
76.12	03/22/04	Organization	Sierra Club (Frank P. Angel)	Biology	California red-legged frog	What data support 25-foot or 40-foot buffers? What herbicides and pesticides are compatible with aquatic systems?	76.12
76.13	03/22/04	Organization	Sierra Club (Frank P. Angel)	Biology	Sensitive species and habitats	Is list of rare wildlife species complete?	76.13
76.14	03/22/04	Organization	Sierra Club (Frank P. Angel)	Biology	Common Wildlife	Which common species are affected by this project? None are mentioned.	76.14
76.15	03/22/04	Organization	Sierra Club (Frank P. Angel)	Biology	Monarch Butterflies	Do wind-protected groves of Monterey pine and Monterey cypress butterfly roosts? Does the project impact roosting sites.	76.15
76.16	03/22/04	Organization	Sierra Club (Frank P. Angel)	Public Services and Utilities	Water Supply and Demand	DEIR should assess impact of water demand based on 2002 baseline	See Master Response MR-PSU-2 in Chapter 2.

Table 5-2  
PBC DMF/PDP DEIR Comments  
By Author

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
76.17	03/22/04	Organization	Sierra Club (Frank P. Angel)	Statement	Statement	If respect for the forest and the laws that protect it means anything, it means the project cannot be approved as proposed.	76.17
91.01	04/07/04	Organization	Sierra Club (Frank P. Angel)	Alternatives	Range of Alternatives	Requests EIR evaluate environmental pros and cons of using artificial turf on golf course and driving range re: elimination of pesticide use; urban runoff with pesticides and pathogens and contaminants found in treated wastewater, and water use	See Master Response MR-ALT-1 in Chapter 2.
91.02	04/07/04	Organization	Sierra Club (Frank P. Angel)	Hydrology and Water Quality	Recycled Water quality	DEIR fails to review adverse effects of PPCPs, synthetic steroids and estrogenic drugs in treated wastewater and how to mitigate effects.	91.02
91.03	04/07/04	Organization	Sierra Club (Frank P. Angel)	Public Services and Utilities	Water Supply and Demand	Requests clarification of drier than normal year scenario; states that DEIR appears to understate impacts on water supply sources for cumulative & drought conditions	See Master Response MR-PSU-2 in Chapter 2.
91.04	04/07/04	Organization	Sierra Club (Frank P. Angel)	Public Services and Utilities	Water Supply and Demand	DEIR does not clearly identify golf course water use	See Master Response MR-PSU-2 in Chapter 2.
91.05	04/07/04	Organization	Sierra Club (Frank P. Angel)	Public Services and Utilities	Water Supply and Demand	Requests explanation of why reclaimed to potable ratio is low for proposed project	See Master Response MR-PSU-2 in Chapter 2.
91.06	04/07/04	Organization	Sierra Club (Frank P. Angel)	Public Services and Utilities	Water Supply and Demand	Requests information on existing GC use	See Master Response MR-PSU-2 in Chapter 2.
91.07	04/07/04	Organization	Sierra Club (Frank P. Angel)	Public Services and Utilities	Water Supply and Demand	Requests information on cumulative use with project	See Master Response MR-PSU-2 in Chapter 2.
91.08	04/07/04	Organization	Sierra Club (Frank P. Angel)	Public Services and Utilities	Water Supply and Demand	DEIR does not assess physical impacts on Carmel River/Seaside aquifer of additional water use	See Master Response MR-PSU-2 in Chapter 2.
91.09	04/07/04	Organization	Sierra Club (Frank P. Angel)	Public Services and Utilities	Water Supply and Demand	Use of potable water for irrigation does not put state water resources to beneficial use and is an impermissible waste of water.	See Master Response MR-PSU-2 in Chapter 2.
91.10	04/07/04	Organization	Sierra Club (Frank P. Angel)	Public Services and Utilities	Water Supply and Demand	Use of potable water for irrigation does not put state water resources to beneficial use and is an impermissible waste of water.	See Master Response MR-PSU-2 in Chapter 2.
64.01	03/22/04	Organization	Sierra Club Ventana Chapter	Biology	Monterey pine forest	Description of MPF is inadequate in terms of a. Diversity, b. status/sensitivity, c. invasive species threats.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
64.02	03/22/04	Organization	Sierra Club Ventana Chapter	Biology	Monterey pine forest	Assessment of geographic scope of impacts to MPF does not include other countries that use Monterey Pine commercially.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
64.03	03/22/04	Organization	Sierra Club Ventana Chapter	Biology	Monterey pine forest	No substantial evidence for 5% threshold; if used should apply to DMF and/or to subtypes.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
64.04	03/22/04	Organization	Sierra Club Ventana Chapter	Biology	Monterey pine forest	Inadequate description of indirect effects on forest of bringing development and people into area	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
64.05	03/22/04	Organization	Sierra Club Ventana Chapter	Biology	Monterey pine forest	Ecosystem-level impact analysis lacking (in particular, climate)	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
64.06	03/22/04	Organization	Sierra Club Ventana Chapter	Biology	Monterey pine forest	Ineffective consideration of cumulative impacts to forest from previous development, project, and future development (including fire suppression, natural regeneration ability, climate change, hard edges)	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
64.07	03/22/04	Organization	Sierra Club Ventana Chapter	Biology	Monterey pine forest	Edge effects neglected in DEIR and thus DEIR overstates value of reserves	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
64.08	03/22/04	Organization	Sierra Club Ventana Chapter	Biology	Yadon's piperia	Mitigation BIO-D1-1 does not provide a reasonable expectation of mitigating YP impacts to a less than significant level; due to insufficient biological information and inconsistent application of metapopulation; Mitigation BIO-D1-3 insufficient to mitigate impact to YP to LTS and likely infeasible	See Master Response MR-BIO-6 in Chapter 2.
64.09	03/22/04	Organization	Sierra Club Ventana Chapter	Biology	Tree Removal	Mitigation BIO-11-1 insufficient; does not protect forest health; may result in adverse effects itself.	64.09
41.01	03/22/04	Individual	Avera, Dr. and Mrs. John B	Land Use	Measure A	Measure A was a deceptive ploy	See Master Response MR-LU-1 in Chapter 2.
41.02	03/22/04	Individual	Avera, Dr. and Mrs. John B	Biology	Monterey pine forest	How can the felling of over 17,900 trees save an already dwindling forest?	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
41.03	03/22/04	Individual	Avera, Dr. and Mrs. John B	Land Use	Spanish Bay permit conditions and Sawmill easements	Sawmill site was supposed to be preserved., trees are being removed from site	See Master Response MR-LU-2 in Chapter 2.
41.04	03/22/04	Individual	Avera, Dr. and Mrs. John B	Biology	Monterey pine forest	Impacts cannot be honestly and biologically mitigated.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
41.05	03/22/04	Individual	Avera, Dr. and Mrs. John B	Statement	Statement	Questions qualifications of applicant's consultant and applicants' biological education.	Comment noted
41.06	03/22/04	Individual	Avera, Dr. and Mrs. John B	Statement	Statement	Yadon's piperia damaged by biologists.	Comment noted
41.07	03/22/04	Individual	Avera, Dr. and Mrs. John B	Statement	Statement	Supports protection of beaches, forest and wildlife	Comment noted
109.01	09/20/04	Individual	Bhaskar, Elizabeth	Other	New Equestrian Center	Concern about tree removal and aesthetics, wasting energy. Existing equestrian center could be improved instead.	109.01
109.02	09/20/04	Individual	Bhaskar, Elizabeth	Other	New Golf Course	Feels new golf course on "old land" will "waste earth."	109.02
109.03	09/20/04	Individual	Bhaskar, Elizabeth	Other	Statement	Feels Pebble Beach should be beautiful with open land and preserved for the future.	Comment noted
59.01	03/22/04	Individual	Burych, Donna	Alternatives	Range of Alternatives	Retain EQ Center in current location due to impact on HHNA.	See Master Response MR-ALT-1 and MR-BIO-4 in Chapter 2.
59.02	03/22/04	Individual	Burych, Donna	Alternatives	Range of Alternatives	Put the Driving Range in the lower EQ Center	See Master Response MR-ALT-1 in Chapter 2.
59.03	03/22/04	Individual	Burych, Donna	Alternatives	Range of Alternatives	Redesign Spanish Bay Employee Housing area	See Master Response MR-ALT-1 in Chapter 2.
59.04	03/22/04	Individual	Burych, Donna	Biology	Resource Management Plans	RMP issues re: mitigation and invasive weeds	See Master Response MR-BIO-9 in Chapter 2.
53.01	03/22/04	Individual	Cacace, Stefano	Biology	Wetlands	Don't restrict use of Sawmill site due to wetlands because they are man-made.	See Master Response MR-BIO-3 in Chapter 2.
53.02	03/22/04	Individual	Cacace, Stefano	Biology	HHNA	Don't restrict horse use of trails in HHNA; assess access to trails during GC construction	See Master Response MR-BIO-4 and MR-PSU-3 in Chapter 2.
53.03	03/22/04	Individual	Cacace, Stefano	Biology	Weed-free feed	Proposal to use weed-free feed is appropriate and unnecessary	See Master Response MR-BIO-4 in Chapter 2.
85.01	03/31/04	Individual	Caneer, D	Biology	Tree Removal	Requests clarification of Highway 68 widening and impact on tree removals within buffer between Highway 68 and Sunridge Drive	85.01
86.01	04/05/04	Individual	Caneer, D	Public Services and Utilities	Emergency Access Wildland Fire Hazard	Impacts apply to project as a whole	86.01
86.02	04/05/04	Individual	Caneer, D	Public Services and Utilities	Emergency Access Wildland Fire Hazard	Mitigation should apply throughout DMF, not just to project	86.02
86.03	04/05/04	Individual	Caneer, D	Public Services and Utilities	Emergency Access Wildland Fire Hazard	Existing PBCSD ordinances are not being adhered to	86.03
86.04	04/05/04	Individual	Caneer, D	Public Services and Utilities	Emergency Access Wildland Fire Hazard	DEIR should identify fire prevention measures for all existing and new development	86.04
110.01	09/27/04	Individual	Cava, Carolyn	Other	New Equestrian Center	Thinks there are enough local golf courses and that improving the existing equestrian center would be more environmentally sound.	86.04
50.01	03/22/04	Individual	Coakley, Kaye L.	Public Services and Utilities	Parks, Recreation, and Open Space	Construction of employee housing in Area B will affect trails used by dogs and their walkers. Could the development be put somewhere else?	See Master Response MR-PSU-3 in Chapter 2.
11.01	03/02/04	Individual	Cowan, Bruce	Statement	Statement	Supports preservation of forest areas, location of driving range, and EQ center	Comment noted
11.02	03/02/04	Individual	Cowan, Bruce	Biology	Wetlands	Lower wetland in Sawmill site should be fenced	See Master Response MR-BIO-3 in Chapter 2.

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
11.03	03/02/04	Individual	Cowan, Bruce	Biology	HHNA	SFB Morse should be maintained to eliminate invasives	See Master Response MR-BIO-4 in Chapter 2.
11.04	03/02/04	Individual	Cowan, Bruce	Biology	Resource Management Plans	Supports long-term commitment to preserve species/control invasives	See Master Response MR-BIO-9 in Chapter 2.
101.01	05/07/04	Individual	Dilworth et al	Biology	Yadon's piperia	Suggests Subdivision Committee protect Yadon's piperia. Suggests that CCC believes that all state or federal listed species are ESHA and criticizes DEIR for refusing to acknowledge this. Suggests rejection of project until Yadon's piperia are protected as ESHA.	See Master Response MR-BIO-6 in Chapter 2.
2.01	02/10/04	Individual	Dutton, Alice M.	Biology	Monterey pine forest	Forest will be "decimated"	See Master Response MR-BIO-5 in Chapter 2.
2.02	02/10/04	Individual	Dutton, Alice M.	Transportation and Circulation	DMF traffic	Congestion will require 4-lane roads in DMF	See Master Response MR-TC-1 in Chapter 2.
2.03	02/10/04	Individual	Dutton, Alice M.	Alternatives	Range of Alternatives	Scale down the golf course and excessive development and save the forest	See Master Response MR-ALT-1 in Chapter 2.
9.01	02/27/04	Individual	Eddy, Edith	Biology	Monterey pine forest	Concern over removal of forest for new golf course and new equestrian center	See Master Response MR-BIO-5 in Chapter 2.
105.01	07/13/04	Individual	Eddy, Edith	Public Services and Utilities	Water Supply and Demand	Alleges project would burden water supply to a catastrophic degree.	See Master Response MR-PSU-2 in Chapter 2.
5.01	02/18/04	Individual	Ford, III, Alexander L.	Public Services and Utilities	Parks, Recreation, and Open Space	Supports connecting Pacific Grove trails to Carmel Trail	See Master Response MR-PSU-3 in Chapter 2.
39.01	03/22/04	Individual	Gameiro, Kay	Biology	HHNA	No mention of damage from bicycles; equestrian use will diminish bicycle use and resultant damage; equestrians manage trails	See Master Response MR-BIO-4 in Chapter 2.
39.02	03/22/04	Individual	Gameiro, Kay	Biology	Wetlands	Wetlands are man-made and should be corrected to avoid constraint to equestrian use	See Master Response MR-BIO-3 in Chapter 2.
54.01	03/22/04	Individual	Gauvreau, Mr. And Mrs. David	Statement	Statement	Supports project	Comment noted
98.01	04/08/04	Individual	Gavreau, David	Statement	Statement	Believes project has been reduced substantially over prior proposals and is consistent with Measure A, and represents less buildout than the existing LCP.	Comment noted
98.02	04/08/04	Individual	Gavreau, David	Statement	Statement	Suggests that there should be grandfathering of permits for projects consistent with LUP.	Comment noted
34.01	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	Safety and trail use are very important; agree with DMFPO and PBRTA comments	See Master Response MR-PSU-3 in Chapter 2.
34.02	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	Rides are longer than 1 hour; trails follow along or cross Congress, no mention of existing Red Trail crossing on Congress; visible markings should be added	See Master Response MR-PSU-3 in Chapter 2.
34.03	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	Was a golf course design considered with Drake or Portola left open? Pedestrian/equestrian safety not addressed.	See Master Response MR-PSU-3 in Chapter 2.
34.04	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	Red trail crossing of Congress not addressed	See Master Response MR-PSU-3 in Chapter 2.
34.05	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	Need circular trail at the new golf course to connect trails	See Master Response MR-PSU-3 in Chapter 2.
34.06	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	Clarify proposed relocated trail at golf course; Area K trail relocation?	See Master Response MR-PSU-3 in Chapter 2.
34.07	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	Pedestrian/equestrian safety at crossings of truck routes should be addressed	See Master Response MR-PSU-3 in Chapter 2.
34.08	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	Trails at GC need to be dedicated for pedestrian/equestrian use; off-road with vegetation buffer	See Master Response MR-PSU-3 in Chapter 2.
34.09	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	Trails at GC and elsewhere need to be built first (or temp trails) before construction	See Master Response MR-PSU-3 in Chapter 2.
34.10	03/19/04	Individual	Getreu, Sanford & Kelly	Biology	HHNA	Maintenance is done by PBC and PBRTA monthly; equestrian restrictions not needed.	See Master Response MR-BIO-4 in Chapter 2.
34.11	03/19/04	Individual	Getreu, Sanford & Kelly	Biology	HHNA	Bikes use trails; rain does damage; horses do not do all damage.	See Master Response MR-BIO-4 in Chapter 2.
34.12	03/19/04	Individual	Getreu, Sanford & Kelly	Biology	Weed-free feed	Weed-free feed is not available locally; private owners can't buy small amounts; infeasible	See Master Response MR-BIO-4 in Chapter 2.
34.13	03/19/04	Individual	Getreu, Sanford & Kelly	Biology	HHNA	Closure of trails is overkill and directs equestrians onto Congress Road	See Master Response MR-BIO-4 in Chapter 2.
34.14	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	No mention of Area K trail	See Master Response MR-PSU-3 in Chapter 2.
34.15	03/19/04	Individual	Getreu, Sanford & Kelly	Transportation and Circulation	Construction	Need to upgrade trail crossings for construction and permanent safety	See Master Response MR-TC-2 in Chapter 2.
34.16	03/19/04	Individual	Getreu, Sanford & Kelly	Transportation and Circulation	Circulation	Retaining Drake or Portola would reduce impact on pedestrian/equestrian safety	34.16
34.17	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	Trails crossings of Congress need to be safe, particularly for construction	See Master Response MR-PSU-3 in Chapter 2.
34.18	03/19/04	Individual	Getreu, Sanford & Kelly	Public Services and Utilities	Parks, Recreation, and Open Space	Need off-road trail along Sombria, Alva, and Ondulado for safety	See Master Response MR-PSU-3 in Chapter 2.
13.01	03/05/04	Individual	Glenn, Mr. And Mrs. John W.	Biology	Bristol Curve	Objects to retaining Bristol Curve and routing traffic on this street, supports an alternative road system to allow elimination of Bristol Curve	See Master Response MR-BIO-7 in Chapter 2.
95.01	03/18/04	Individual	Griffin, Annie	Biology	Monterey pine forest	No human can mitigate. Old trees carry genetic blueprint for immunity. Need trees to offset loss due to Pitch canker. Mitigation should be to buy up Mr. Lombardo's golf course.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.



#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
95.02	03/18/04	Individual	Griffin, Annie	Hydrology and Water Quality	Pesticides and fertilizer	Project use of pesticides and fertilizers will increase harmful algal blooms "red tides". Concern about toxicity of elements in pesticides and fertilizers.	95.02
95.03	03/18/04	Individual	Griffin, Annie	Public Services and Utilities	Water Supply and Demand	Where will they get the water for the golf course?	See Master Response MR-PSU-2 in Chapter 2.
95.04	03/18/04	Individual	Griffin, Annie	Biology	California red-legged frog	What are effects of pesticides and fertilizers on CRLF? Suggest mitigation to provide breeding program.	95.04
95.05	03/18/04	Individual	Griffin, Annie	Hydrology and Water Quality	Pesticides and fertilizer	Alleges illegals use of pesticides by applicant.	This comment is noted
95.06	03/18/04	Individual	Griffin, Annie	Process	CEQA Process	Requests hearings be held when people who work can attend and held locally.	See Master Response MR-GEN-2 in Chapter 2.
95.07	03/18/04	Individual	Griffin, Annie	Alternatives	Range of Alternatives	Suggests crabgrass golf course as alternative	See Master Response MR-ALT-1 in Chapter 2.
61.01	03/22/04	Individual	Hale, Robert	Biology	Dune habitat and species	Justify 10% invasive non-native plant criteria for dune habitat management	See Master Response MR-BIO-2 in Chapter 2.
61.02	03/22/04	Individual	Hale, Robert	Biology	HHNA	Further mitigation for HHNA is needed to monitor whether manure is fertilizing and supporting non-native plants and grasses and to require cleanup. Blue trail increase use will result in vegetation loss.	See Master Response MR-BIO-4 in Chapter 2.
61.03	03/22/04	Individual	Hale, Robert	Biology	HHNA	Place horse traffic on wider shoulder of Congress Road instead of Blue trail; monitor and eradicate invasives in HHNA as mitigation	See Master Response MR-BIO-4 in Chapter 2.
61.04	03/22/04	Individual	Hale, Robert	Biology	New Equestrian Center	Redesign entrance road and parking to reduce impact on Monterey pine forest/manzanita forest and wetland/riparian area. Use existing dirt road instead.	61.04
61.05	03/22/04	Individual	Hale, Robert	Biology	HHNA	Control impact of blowing hay/weeds	See Master Response MR-BIO-4 in Chapter 2.
61.06	03/22/04	Individual	Hale, Robert	Public Services and Utilities	Parks, Recreation, and Open Space	Address impact of manure on non-equestrian users by periodic cleanup and development of separate hiker and horse trails.	See Master Response MR-PSU-3 in Chapter 2.
61.07	03/22/04	Individual	Hale, Robert	Aesthetics	Visual character	New EOC will affect recreational experience. Setback buildings further and require screening of outdoor lighting.	61.07
61.08	03/22/04	Individual	Hale, Robert	Alternatives	Range of Alternatives	Impacts of new EOC on HHNA are substantial; should not be allowed when there is an alternative +F669f scaling back development slightly and not moving the existing EOC is viable.	See Master Response MR-ALT-1 in Chapter 2.
61.09	03/22/04	Individual	Hale, Robert	Alternatives	Range of Alternatives	Reduce residential lots: K (avoid piperia); F-3 (smaller lots save more Hooker's Manzanita, shorter access road); PQR (relocate Lots 2 and 3 or provide 200 foot buffer to Spruance Measure and prevent usage by residents and their dogs; reduce Lots 5,6,7 size; reduce I-2 lot size; reduce F-2 lot size)	See Master Response MR-ALT-1 in Chapter 2.
61.10	03/22/04	Individual	Hale, Robert	Biology	Resource Management Plans	Amplify weed management element of RMPs to promote eradication; include public hearing for input into management; oversight; add more offsite preservation	See Master Response MR-BIO-9 in Chapter 2.
61.11	03/22/04	Individual	Hale, Robert	Biology	Monterey pine forest	Replanting does not make up for loss of intact habitat. Insufficient space to replant all removed where things not already growing. Significant offsite preservation will be helpful to reduce significance of loss.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
61.12	03/22/04	Individual	Hale, Robert	Biology	Yadon's piperia	TEAM plan does not identify how much suitable habitat exists; reduction of habitat loss only way to mitigate.	See Master Response MR-BIO-6 in Chapter 2.
61.13	03/22/04	Individual	Hale, Robert	Alternatives	Range of Alternatives	Move driving range/golf academy to lower Sawmill site to avoid impact on Area C forest.	See Master Response MR-ALT-1 in Chapter 2.
61.14	03/22/04	Individual	Hale, Robert	Alternatives	Range of Alternatives	Expand Spyglass GC by 9-holes, don't move EOC, potentially put golf academy at MNOUV, all to reduce impact on MNOUV.	See Master Response MR-ALT-1 in Chapter 2.
61.15	03/22/04	Individual	Hale, Robert	Alternatives	Range of Alternatives	Redesign SB Employee Housing further west to reduce conflict with trail users and forest; if EOC not moved, then move SB employee housing to Upper Sawmill	See Master Response MR-ALT-1 in Chapter 2.
61.16	03/22/04	Individual	Hale, Robert	Biology	Wetlands	Wetland B-B is not a wetland.; if not wetland, employee housing could be moved to better buffer from recreational use.	See Master Response MR-BIO-3 in Chapter 2.
100.01	04/27/04	Individual	Hartwell, Thomas A. H. Mrs	Hydrology and Water Quality	Stormwater runoff	Concern about drainage from golf course.	100.01
100.02	04/27/04	Individual	Hartwell, Thomas A. H. Mrs	Hydrology and Water Quality	Stormwater runoff	Alleges existing drainage problems from Collins field are not addressed by applicant.	This comment is noted
100.03	04/27/04	Individual	Hartwell, Thomas A. H. Mrs	Hydrology and Water Quality	Stormwater runoff	Suggests a "permanent water drainage plan" included in project plans.	100.03
65.01	03/22/04	Individual	Havisdie, Elizabeth B.	Public Services and Utilities	Parks, Recreation, and Open Space	Do not compromise equestrian activities in any way with replacement of the current EOC.	See Master Response MR-PSU-3 in Chapter 2.
3.01	02/13/04	Individual	Housel, Mary	Question	Question	Would Peter Hay GC be eliminated?	3.01
3.02	02/13/04	Individual	Housel, Mary	Question	Question	What is equestrian access from New EQ Center to Beach?	3.02
3.03	02/13/04	Individual	Housel, Mary	Transportation and Circulation	Circulation	Entrance to New EQ Center should be moved	3.03
3.04	02/13/04	Individual	Housel, Mary	Public Services and Utilities	Parks, Recreation, and Open Space	Equestrian access from Pebble Beach to New EQ Center should avoid Mission St.	See Master Response MR-PSU-3 in Chapter 2.
6.01	02/18/04	Individual	Hunter, Ted H.	Biology	Bristol Curve	Routing traffic Bristol Curve to avoid Yadon's piperia would increase traffic and noise and is unacceptable.	See Master Response MR-BIO-7 in Chapter 2.
12.01	03/04/04	Individual	Hunter, Ted H.	Biology	Bristol Curve	Objects to retaining Bristol Curve and routing traffic on this street, supports an alternative road system to allow elimination of Bristol Curve	See Master Response MR-BIO-7 in Chapter 2.
31.01	03/19/04	Individual	Hunter, Ted H.	Format	Format	Add an index and glossary	See Master Response MR-GEN-1 in Chapter 2.
31.02	03/19/04	Individual	Hunter, Ted H.	Land Use	Measure A	Include copy of Measure A; explain when and where environmental analysis of Measure A available	See Master Response MR-LU-1 in Chapter 2.
31.03	03/19/04	Individual	Hunter, Ted H.	Land Use	Measure A	Add reference in Appendix C regarding Measure A amendment of LCP and LUP	See Master Response MR-LU-1 in Chapter 2.
31.04	03/19/04	Individual	Hunter, Ted H.	Land Use	Policy Consistency	Add reference to 1976 Coastal Act extracts for DMF to Appendix C	See Master Response MR-LU-1 in Chapter 2.
31.05	03/19/04	Individual	Hunter, Ted H.	Project Description	Applications	Include copy of each application; project description is inadequate	31.05
31.06	03/19/04	Individual	Hunter, Ted H.	Format	Format	Reformat DEIR by application; retitle project areas; provide mitigation by each project	See Master Response MR-GEN-1 in Chapter 2.
31.07	03/19/04	Individual	Hunter, Ted H.	Mitigation Monitoring	Enforcement	Require Monterey County to enforce conditions	See Master Response MR-GEN-3 in Chapter 2.
31.08	03/19/04	Individual	Hunter, Ted H.	Land Use	Spanish Bay permit conditions and Sawmill easements	Reference should be made to enforcing pending Spanish Bay permit conditions	See Master Response MR-LU-2 in Chapter 2.
31.09	03/19/04	Individual	Hunter, Ted H.	Project Description	Construction Schedule	Schedule on Table 3.7-1A should have start and end times; Why hasn't DEIR assessed construction work at same time? Highway 1/68 should be #1 project; EQ Center should be #2 project	31.09
31.10	03/19/04	Individual	Hunter, Ted H.	Biology	Monterey pine forest	MPF is ESHA; DEIR should discuss CCC Periodic review recommendations on ESHA	See Master Response MR-BIO-5 in Chapter 2.
31.11	03/19/04	Individual	Hunter, Ted H.	Project Description	Final buildout	Project should be conditioned that this is "Final buildout"; Measure A is open-ended on visitor-serving units	31.11
31.12	03/19/04	Individual	Hunter, Ted H.	Transportation and Circulation	Highway 68	There are funding problems with 1/68; Why isn't scenic drive bridge addressed?	See Master Response MR-TC-1 in Chapter 2.
31.13	03/19/04	Individual	Hunter, Ted H.	Biology	Bristol Curve	Non realignment of Stevenson Drive is not acceptable; need other alternatives to eliminate significant adverse impact	See Master Response MR-BIO-7 in Chapter 2.

Table 5-2  
PBC DMF/PDP DEIR Comments  
By Author

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
31.14	03/19/04	Individual	Hunter, Ted H.	Biology	Monterey pine forest	Mitigation for MPF are not appropriate, particularly those for areas outside DMF; climatic effects of forest loss not addressed; particular impact on residential forested character near golf course not "isolated"	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
31.15	03/19/04	Individual	Hunter, Ted H.	Public Services and Utilities	Water Supply and Demand	Phase II affect on project should be addressed as well as restrictions on Carmel River withdrawal; special condition to restrict potable water use on new golf course should be added; DEIR does not address that project will increase overdraft of Carmel river as significant unavoidable impact	See Master Response MR-PSU-2 in Chapter 2.
31.16	03/19/04	Individual	Hunter, Ted H.	Format	Format	Difficult to assess EQ Center because of format; copies of easements should be included	See Master Response MR-GEN-1 in Chapter 2.
31.17	03/19/04	Individual	Hunter, Ted H.	Land Use	Policy Consistency	Title 20 ordinance re: RV and camping & EQ center should be addressed	See Master Response MR-LU-1 in Chapter 2.
31.18	03/19/04	Individual	Hunter, Ted H.	Biology	Wetlands	Wetlands at EQ should be better defined	See Master Response MR-BIO-3 in Chapter 2.
31.19	03/19/04	Individual	Hunter, Ted H.	Project Description	New Equestrian Center	Define temporary events.	31.19
31.20	03/19/04	Individual	Hunter, Ted H.	Transportation and Circulation	DMF traffic	Trucking horses to "Ocean Area" not addressed.	31.20
31.21	03/19/04	Individual	Hunter, Ted H.	Project Description	New Equestrian Center	Acresage at EQ Center?	31.21
31.22	03/19/04	Individual	Hunter, Ted H.	Biology	HHNA	Who will coordinate environmental education of HHNA users?	See Master Response MR-BIO-4 in Chapter 2.
31.23	03/19/04	Individual	Hunter, Ted H.	Project Description	New Equestrian Center	How many special events, participants, spectators, days?	31.23
31.24	03/19/04	Individual	Hunter, Ted H.	Transportation and Circulation	DMF traffic	Traffic impact of special events at new EQC	31.24
31.25	03/19/04	Individual	Hunter, Ted H.	Noise	Long-Term Noise	Noise impact of special events at new EQC	31.25
31.26	03/19/04	Individual	Hunter, Ted H.	Transportation and Circulation	Circulation	Road improvements at Spanish Bay inadequate need separate entrance to Townhomes	31.26
31.27	03/19/04	Individual	Hunter, Ted H.	Transportation and Circulation	Emergency Access	Road improvements at Spanish Bay inadequate need separate entrance to Townhomes for emergency access;	31.27
31.28	03/19/04	Individual	Hunter, Ted H.	Biology	Bristol Curve	Bristol Curve issues require addendum to DEIR and public review, update Figures 3.7-3 and 3.7-4; timing of road changes at golf course	See Master Response MR-BIO-7 in Chapter 2.
31.29	03/19/04	Individual	Hunter, Ted H.	Public Services and Utilities	Police services	Police is a Monterey County obligation; should not be in EIR	See Master Response MR-PSU-1 in Chapter 2.
31.30	03/19/04	Individual	Hunter, Ted H.	Public Services and Utilities	Wildland Fire Hazard	Section does not include Fire Defense plans for all DMF	31.30
31.31	03/19/04	Individual	Hunter, Ted H.	Public Services and Utilities	Emergency Access	Section does not include emergency routes for all DMF	31.31
48.01	03/22/04	Individual	Hunter, Ted H.	Land Use	Measure A	Questions appropriateness of processing application without amended LCP or GP including Measure A.	See Master Response MR-LU-1 in Chapter 2.
48.02	03/22/04	Individual	Hunter, Ted H.	Process	CEQA Process	Questions appropriateness of LUAC meeting and Subdivision Committee meeting prior to preparation of FEIR. Questions public disclosure periods for FEIR.	See Master Response MR-GEN-2 in Chapter 2.
97.01	04/08/04	Individual	Hunter, Ted H.	Land Use	Measure A	Concerned about subdivision committee taking action without prior certification of Measure A.	See Master Response MR-LU-1 in Chapter 2.
97.02	04/08/04	Individual	Hunter, Ted H.	CEQA	CEQA Process	Concerned about subdivision committee taking action without Final EIR.	See Master Response MR-GEN-2 in Chapter 2.
97.03	04/08/04	Individual	Hunter, Ted H.	Land Use	Measure A	Recommends County take action on Measure A and Spanish Bay permit amendments prior to processing current applications.	See Master Response MR-LU-1 in Chapter 2.
36.01	03/22/04	Individual	Hurley, Margaret et al.	Public Services and Utilities	Parks, Recreation, and Open Space	Build new equestrian center before demolishing existing one	See Master Response MR-PSU-3 in Chapter 2.
36.02	03/22/04	Individual	Hurley, Margaret et al.	Biology	HHNA	HHNA trails should allow pedestrians and equestrians	See Master Response MR-BIO-4 in Chapter 2.
36.03	03/22/04	Individual	Hurley, Margaret et al.	Biology	Weed-free feed	Not available in area; impossible; more impact from birds	See Master Response MR-BIO-4 in Chapter 2.
36.04	03/22/04	Individual	Hurley, Margaret et al.	Biology	HHNA	Don't restrict trail use after rainfall, not necessary	See Master Response MR-BIO-4 in Chapter 2.
36.05	03/22/04	Individual	Hurley, Margaret et al.	Biology	Wetlands	Sawmill wetlands are man-made due to poor grading	See Master Response MR-BIO-3 in Chapter 2.
55.01	03/22/04	Individual	Hurley, Margaret.x	Cultural Resources	Existing Equestrian Center	Existing EQ Center meets CRHR criteria and is a historic site	55.01
68.01	03/22/04	Individual	James, Dr. and Mrs. Paul G.	Biology	Monterey pine forest	Golf course would eliminate biodiversity and the polo field recreation	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
68.02	03/22/04	Individual	James, Dr. and Mrs. Paul G.	Public Services and Utilities	Parks, Recreation, and Open Space	Find ways to accommodate the needs of the equestrian and trail walking community	See Master Response MR-PSU-3 in Chapter 2.
111.01	09/27/04	Individual	Kilough, Courtney	Biology	New Equestrian Center	Concerned about impact on deer squirrels, birds, and other radiant creatures.	111.01
1.01	02/09/04	Individual	Kmetovic, Anne Reese	Statement	Statement	Applicant should be allowed to complete their development.	Comment noted
70.01	03/22/04	Individual	Kunitani, Craig	Project Description	Trails	How is trail mileage calculated? How many trails and maintenance roads will be eliminated by development?	70.01
70.02	03/22/04	Individual	Kunitani, Craig	Public Services and Utilities	Parks, Recreation, and Open Space	Relocation of trails from middle of open space to along paved road is a degradation of safety and aesthetics for trail users.	See Master Response MR-PSU-3 in Chapter 2.
70.03	03/22/04	Individual	Kunitani, Craig	Public Services and Utilities	Parks, Recreation, and Open Space	Maintenance trails at new GC should be open as recreational trails	See Master Response MR-PSU-3 in Chapter 2.
70.04	03/22/04	Individual	Kunitani, Craig	Public Services and Utilities	Parks, Recreation, and Open Space	Relocate new trail at F-3 further east and connect to trail south of Lopez Road	See Master Response MR-PSU-3 in Chapter 2.
70.05	03/22/04	Individual	Kunitani, Craig	Public Services and Utilities	Parks, Recreation, and Open Space	Supports trails routing at I-2	See Master Response MR-PSU-3 in Chapter 2.
70.06	03/22/04	Individual	Kunitani, Craig	Public Services and Utilities	Parks, Recreation, and Open Space	Relocate trail at Area K on the golf course side of Area K not the Stevenson Road side	See Master Response MR-PSU-3 in Chapter 2.
70.07	03/22/04	Individual	Kunitani, Craig	Public Services and Utilities	Parks, Recreation, and Open Space	Spanish Bay Employee Housing would eliminate dirt road used for recreation, not addressed in DEIR	See Master Response MR-PSU-3 in Chapter 2.
70.08	03/22/04	Individual	Kunitani, Craig	Transportation and Circulation	Circulation	Congress Road improvements should fix poor drainage which leads to potholes	70.08
70.09	03/22/04	Individual	Kunitani, Craig	Biology	Dune habitat and species	Realign two holes at GC to avoid building on dunes and to expand conservation area	See Master Response MR-BIO-2 in Chapter 2.
4.01	02/18/04	Individual	LaMothe, DDS, Daniel E.	Statement	Statement	Never seen PBC or its predecessors do anything contrary to the betterment of the Del Monte Forest.	Comment noted
15.01	03/09/04	Individual	Lehman, Gifford and Pam	Biology	Bristol Curve	Develop alternative to routing traffic on Bristol Curve due to noise and traffic impact	See Master Response MR-BIO-7 in Chapter 2.
16.01	03/09/04	Individual	Long, Darryl	Biology	Bristol Curve	Develop alternative to routing traffic on Bristol Curve due to noise and traffic impact	See Master Response MR-BIO-7 in Chapter 2.
56.01	03/22/04	Individual	Lord-Wolfe, Edith	Biology	Weed-free feed	Don't require weed-free feed	See Master Response MR-BIO-4 in Chapter 2.

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
56.02	03/22/04	Individual	Lord-Wolfe, Edith	Biology	HHNA	DEIR doesn't mention that bikes and motorbikes are prohibited on trails	See Master Response MR-BIO-4 in Chapter 2.
56.03	03/22/04	Individual	Lord-Wolfe, Edith	Biology	Wetlands	Man-made wetlands restrictions at Sawmill could stop PB Dressage show.	See Master Response MR-BIO-3 in Chapter 2.
56.04	03/22/04	Individual	Lord-Wolfe, Edith	Public Services and Utilities	Parks, Recreation, and Open Space	If (GC) construction begins before EQ Center built & horses moved, noise and construction are safety hazard for equestrian use.	See Master Response MR-PSU-3 in Chapter 2.
45.01	03/22/04	Individual	Mauz, Peggy	Public Services and Utilities	Parks, Recreation, and Open Space	There must be an equestrian center in Pebble Beach.	See Master Response MR-PSU-3 in Chapter 2.
45.02	03/22/04	Individual	Mauz, Peggy	Public Services and Utilities	Parks, Recreation, and Open Space	New EQC must be completed before demolition of the existing one.	See Master Response MR-PSU-3 in Chapter 2.
45.03	03/22/04	Individual	Mauz, Peggy	Hydrology and Water Quality	Manure management	Mitigation is questionable.	See Master Response MR-HWQ-1 in Chapter 2.
45.04	03/22/04	Individual	Mauz, Peggy	Biology	Weed-free feed	How will this be monitored and enforced?	See Master Response MR-BIO-4 in Chapter 2.
45.05	03/22/04	Individual	Mauz, Peggy	Public Services and Utilities	Parks, Recreation, and Open Space	New EQC should provide a field adequate for recreational pursuits	See Master Response MR-PSU-3 in Chapter 2.
38.01	03/22/04	Individual	McCarthy, Carol	Project Description	Preservation Areas Measure A	Some preservation areas have been previously dedicated; Sawmill would upzone by Measure A	38.01
38.02	03/22/04	Individual	McCarthy, Carol	Project Description	Temporary Events	No definition of events in DEIR	38.02
38.03	03/22/04	Individual	McCarthy, Carol	Land Use	New Equestrian Center	Pygmy Forest and Gowen cypress adjacent to new EQC	38.03
38.04	03/22/04	Individual	McCarthy, Carol	Land Use	Measure A	Measure A is not certified so use is incompatible	See Master Response MR-LU-1 in Chapter 2.
38.05	03/22/04	Individual	McCarthy, Carol	Land Use	Land use compatibility	New EQC is intrusive use in HHNA/SFB Morse	38.05
38.06	03/22/04	Individual	McCarthy, Carol	Land Use	Measure A	Identify upzoned acres with Measure A at Sawmill site	See Master Response MR-LU-1 in Chapter 2.
38.07	03/22/04	Individual	McCarthy, Carol	Land Use	Spanish Bay permit conditions and Sawmill easements	Clarify consistency with easements in Appendix D and Section 3.1	See Master Response MR-LU-2 in Chapter 2.
38.08	03/22/04	Individual	McCarthy, Carol	Biology	Weed-free feed	Define enforcement of this mitigation	See Master Response MR-BIO-4 in Chapter 2.
38.09	03/22/04	Individual	McCarthy, Carol	Biology	Monterey pine forest	Clarify "foregone restoration"	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
38.10	03/22/04	Individual	McCarthy, Carol	Biology	Monterey pine forest	Mitigation for foregone restoration	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
38.11	03/22/04	Individual	McCarthy, Carol	Biology	Wetlands	Upper sawmill buildings are closer than 100 feet to wetlands	See Master Response MR-BIO-3 in Chapter 2.
38.12	03/22/04	Individual	McCarthy, Carol	Biology	HHNA	Human impact on HHNA due to special events not analyzed	See Master Response MR-BIO-4 in Chapter 2.
38.13	03/22/04	Individual	McCarthy, Carol	Biology	HHNA	Monterey pygmy forest near EC not mapped; reference to USFWS Recovery plan should be added	See Master Response MR-BIO-4 in Chapter 2.
38.14	03/22/04	Individual	McCarthy, Carol	Biology	HHNA	Grubs in manure not addressed	See Master Response MR-BIO-4 in Chapter 2.
38.15	03/22/04	Individual	McCarthy, Carol	Mitigation Monitoring	Enforcement	No mention of monitoring of mitigations	See Master Response MR-GEN-3 in Chapter 2.
38.16	03/22/04	Individual	McCarthy, Carol	Biology	Monterey pine forest	No comparison of clear-cutting vs. selective removal (driving range v. residential); not consistent with Coastal Commission recommendations	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
38.17	03/22/04	Individual	McCarthy, Carol	Biology	Pallid Bat	Substantiate mitigation	38.17
38.18	03/22/04	Individual	McCarthy, Carol	Biology	Monterey pine forest	How does replanting mitigate+F280 tree removal at Spanish Bay Driving Range?	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
38.19	03/22/04	Individual	McCarthy, Carol	Biology	Wetlands	Seasonal wetlands in SB Driving Range not mapped	See Master Response MR-BIO-3 in Chapter 2.
38.20	03/22/04	Individual	McCarthy, Carol	Biology	Wetlands	Seasonal wetlands in SB Driving Range not mapped; no riparian listed for new EQC	See Master Response MR-BIO-3 in Chapter 2.
38.21	03/22/04	Individual	McCarthy, Carol	Biology	HHNA	Define environmental education plan and enforcement of rules	See Master Response MR-BIO-4 in Chapter 2.
38.22	03/22/04	Individual	McCarthy, Carol	Biology	Impact Assessment Methodology	Where are significance criteria?	38.22
38.23	03/22/04	Individual	McCarthy, Carol	Other	Spanish Bay Driving Range	The Minimum removal of vegetation and disturbance is not marked at the site	38.23
38.24	03/22/04	Individual	McCarthy, Carol	Hydrology and Water Quality	Manure management	Monitoring won't mitigate, prevention and cleanup of trails should be required	See Master Response MR-HWQ-1 in Chapter 2.
38.25	03/22/04	Individual	McCarthy, Carol	Transportation and Circulation	Special Events	Parking for new EQC events not discussed	38.25
38.26	03/22/04	Individual	McCarthy, Carol	Transportation and Circulation	Special Events	Usage and mitigations not well defined	38.26
38.27	03/22/04	Individual	McCarthy, Carol	Transportation and Circulation	Parking	Permanent and temporary parking amounts need to be defined	38.27
38.28	03/22/04	Individual	McCarthy, Carol	Transportation and Circulation	Parking	Special events need to be defined as well as use for non EQC events	38.28
38.29	03/22/04	Individual	McCarthy, Carol	Transportation and Circulation	Highway 68	Mitigation for Skyline & Beverly Manor will backup traffic more	See Master Response MR-TC-1 in Chapter 2.
38.30	03/22/04	Individual	McCarthy, Carol	Transportation and Circulation	Highway 68	Closing of Presidio has affected 68, should be addressed in DEIR	38.30
38.31	03/22/04	Individual	McCarthy, Carol	Biology	Biology	Consistency in acreages and tree counts	38.31
38.32	03/22/04	Individual	McCarthy, Carol	Land Use	Land use designations	Is residential use allowed under LUP, LCP, Measure A zoning?	38.32
38.33	03/22/04	Individual	McCarthy, Carol	Format	Format	Difficult to track project-specific impacts; poor cross references; PDFs could not be copied and pasted; no hyperlinks; no index or bookmarks	See Master Response MR-GEN-1 in Chapter 2.
32.01	03/19/04	Individual	Medwin, Ph.D., Herman	Noise	Impact Assessment Methodology	DEIR fails to consider intermittent noise	32.01
32.02	03/19/04	Individual	Medwin, Ph.D., Herman	Noise	Impact Assessment Methodology	DEIR measures noise outputs at 50 feet from source rather than property line	32.02
32.03	03/19/04	Individual	Medwin, Ph.D., Herman	Noise	Construction	Construction traffic will clog DMF gates and not considered in noise assessment	Comment Noted
32.04	03/19/04	Individual	Medwin, Ph.D., Herman	Noise	Construction	Tree removal and grading noise has not been considered in noise assessment	32.04
32.05	03/19/04	Individual	Medwin, Ph.D., Herman	Noise	Construction, Long-Term	Homes "shielded" from noise will be subject to construction noise and traffic noise	32.05

Table 5-2  
PBC DMF/PDP DEIR Comments  
By Author

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
32.06	03/19/04	Individual	Medwin, Ph.D., Herman	Noise	Mitigation	City of Pacific Grove noise standards can be adapted to Pebble Beach	32.06
32.07	03/19/04	Individual	Medwin, Ph.D., Herman	Noise	Mitigation	Mitigation proposed including inventory, max 55 DBA, max increase of 5DBA, etc.	32.07
77.01	03/22/04	Individual	Montella, Thea	Cultural Resources	Existing Equestrian Center	DEIR makes no mention of the rich equestrian history within the forest for significance of the site of the existing EOC.	77.01
77.02	03/22/04	Individual	Montella, Thea	Biology	HHNA	DEIR does not recognize work of volunteers in trail maintenance nor mention impact of mountain bikers and motorized vehicles on trails; equestrian use will discourage illicit uses; mitigation would eliminate availability of trails to horses; routes to coast are unsafe	See Master Response MR-BIO-4 in Chapter 2.
77.03	03/22/04	Individual	Montella, Thea	Alternatives	Range of Alternatives	DEIR fails to propose alternative site for EOC if easements not amended or Measure A not certified; wetlands are man-made and should be re-evaluated.	See Master Response MR-ALT-1 and MR-BIO-3 in Chapter 2
77.04	03/22/04	Individual	Montella, Thea	Biology	Multiple Issues	What mitigation will occur if proposed mitigation fails? Ecosystem can't support impact	77.04
77.05	03/22/04	Individual	Montella, Thea	Public Services and Utilities	Parks, Recreation, and Open Space	If project goes forward, new EOC must be in DMF and must be scope of existing	See Master Response MR-PSU-3 in Chapter 2.
63.01	03/22/04	Individual	Monterey Peninsula Residents	Statement	Statement	Urges CCC to require protection of forest, support findings of periodic review regarding ESHA and Monterey pine forest.	Comment noted
75.01	03/22/04	Individual	Morgan, Karen	Biology	HHNA	Opposes mitigation for weed-free hay, "approved" facility for manure, manure management on trails, storm-event trail closures.F667	See Master Response MR-BIO-4 in Chapter 2.
108.01	09/18/04	Individual	Newton, Andrew	Other	New Golf Course	Thinks golf course is pointless because it would take up a place where families go and relax, could not compete with other golf courses, and would wither down the existing water supply.	108.01
108.02	09/18/04	Individual	Newton, Andrew	Other	New Equestrian Center	Thinks new equestrian center is pointless because it would take less time and money to upgrade the existing center, and the transportation of horses will cost people money.	108.02
33.01	03/19/04	Individual	Nielsen, Arthur B. and Kathleen C.	Statement	Statement	Unnecessary to fill area with buildings, tennis courts, and night-time driving ranges	Comment noted
33.02	03/19/04	Individual	Nielsen, Arthur B. and Kathleen C.	Statement	Statement	No idea of what it would be like to live in the middle of a war-zone for 2-3 years	Comment Noted
33.03	03/19/04	Individual	Nielsen, Arthur B. and Kathleen C.	Transportation and Circulation	Circulation	Concern over construction impact on Spanish Bay entrance	Comment Noted
24.01	03/16/04	Individual	O'Brien, Janice M.	Biology	Monterey pine forest	MPF loss cannot be mitigated by management plans as it has not worked in the past	See Master Response MR-BIO-5 in Chapter 2.
24.02	03/16/04	Individual	O'Brien, Janice M.	Land Use	Policy Consistency	LCP policy consistency is not addressed	See Master Response MR-LU-1 in Chapter 2.
24.03	03/16/04	Individual	O'Brien, Janice M.	Land Use	Measure A	DEIR presumes Measure A certification but CCC staff do not; CCC staff recommendation forbids "devastation" of MPF	See Master Response MR-LU-1 in Chapter 2.
24.04	03/16/04	Individual	O'Brien, Janice M.	Public Services and Utilities	Water Supply and Demand	PBC entitlement not fully valid due to reclamation plant problems; Phase II investor use must be added which exceeds entitlement; project will increase overdraft of Carmel River	See Master Response MR-PSU-2 in Chapter 2.
24.05	03/16/04	Individual	O'Brien, Janice M.	Transportation and Circulation	Highway 68	Highway 1/68 will be of marginal help; no mention of traffic from CHOMP buildout	See Master Response MR-TC-1 in Chapter 2.
24.06	03/16/04	Individual	O'Brien, Janice M.	Land Use	Land use compatibility	Increased commercialism will change residential character of DMF; forest loss will diminish quality of life and property values	24.06
24.07	03/16/04	Individual	O'Brien, Janice M.	Biology	Monterey pine forest	DEIR unclear on preservation of additional areas outside DMF as mitigation	See Master Response MR-BIO-5 in Chapter 2.
24.08	03/16/04	Individual	O'Brien, Janice M.	Biology	Monterey pine forest	No discussion of climatic impact from forest loss	See Master Response MR-BIO-5 in Chapter 2.
24.09	03/16/04	Individual	O'Brien, Janice M.	Statement	Statement	DMF is 1/5 of peninsula, a community resource of inestimable value, a national treasure. Deair must evaluate public interests against financial expectations of Company.	Comment noted
20.01	03/12/04	Individual	Parker, Dave & Patty	Aesthetics	Light and glare	SB teaching facility & parking lot visible from home . Move SB teaching facility 50 yards west and heavily landscape. Forbid night-time lighting	20.01
20.02	03/12/04	Individual	Parker, Dave & Patty	Noise	Spanish Bay Driving Range	Concerned about noise from SB teaching facility; Move SB teaching facility 50 yards west and heavily landscape; remove PA systems	20.02
20.03	03/12/04	Individual	Parker, Dave & Patty	Transportation and Circulation	Circulation	Concerned about traffic from SB teaching facility; Move SB teaching facility 50 yards west and heavily landscape	20.03
20.04	03/12/04	Individual	Parker, Dave & Patty	Biology	Common Wildlife	Concern over wildlife displacement impact on home	20.04
30.01	03/19/04	Individual	Parrish, Richard	Public Services and Utilities	Parks, Recreation, and Open Space	New golf course will reduce access to open space; trail changes not designed w/o local input	See Master Response MR-PSU-3 in Chapter 2.
30.02	03/19/04	Individual	Parrish, Richard	Public Services and Utilities	Parks, Recreation, and Open Space	New trail around GC unsafe during construction and operation for horses near road	See Master Response MR-PSU-3 in Chapter 2.
30.03	03/19/04	Individual	Parrish, Richard	Public Services and Utilities	Parks, Recreation, and Open Space	Access during construction to trails not addressed in DEIR	See Master Response MR-PSU-3 in Chapter 2.
30.04	03/19/04	Individual	Parrish, Richard	Public Services and Utilities	Parks, Recreation, and Open Space	Multiple trails should be provided during construction for access	See Master Response MR-PSU-3 in Chapter 2.
30.05	03/19/04	Individual	Parrish, Richard	Public Services and Utilities	Parks, Recreation, and Open Space	Multiple trails should be provided during construction for access	See Master Response MR-PSU-3 in Chapter 2.
30.06	03/19/04	Individual	Parrish, Richard	Public Services and Utilities	Parks, Recreation, and Open Space	New EQ Center is 1.5 hours by horse from current location; loss of recreation	See Master Response MR-PSU-3 in Chapter 2.
30.07	03/19/04	Individual	Parrish, Richard	Public Services and Utilities	Parks, Recreation, and Open Space	Loss of Collins field as a local multi-use open space degrades quality of life	See Master Response MR-PSU-3 in Chapter 2.
30.08	03/19/04	Individual	Parrish, Richard	Transportation and Circulation	DMF traffic	Removal of roads will increase commute for family of 4 by 1,000 miles	Comment Noted
30.09	03/19/04	Individual	Parrish, Richard	Transportation and Circulation	Emergency Access	Removal of roads will cutoff Sombria Lane during storms	Comment Noted
30.10	03/19/04	Individual	Parrish, Richard	Transportation and Circulation	Circulation	Sombria Lane will be separated from U.S. by golf	Comment Noted
30.11	03/19/04	Individual	Parrish, Richard	Transportation and Circulation	Circulation	Loss of roads cannot be mitigated	Comment Noted
30.12	03/19/04	Individual	Parrish, Richard	Public Services and Utilities	Parks, Recreation, and Open Space	Mitigate for loss of trails and EQ Center by trail from Drake/Sombria to Spyglass/Stevenson	See Master Response MR-PSU-3 in Chapter 2.
30.13	03/19/04	Individual	Parrish, Richard	Public Services and Utilities	Parks, Recreation, and Open Space	Mitigate for loss of trails by retaining Drake or Portola	See Master Response MR-PSU-3 in Chapter 2.
88.01	04/05/04	Individual	Parsons, N.	Statement	Statement	Opposes project due to water supply emergency, gridlock, and loss of Monterey pine forest. Notes impacts of Spanish Bay development on wetlands and wildlife.	This comment is noted
87.01	04/05/04	Individual	Parsons, R.	Statement	Statement	Opposes project due to water supply emergency, gridlock, and loss of Monterey pine forest	Comment noted
80.01	03/24/04	Individual	Redfern, Greg	Biology	Wetlands	Sawmill wetlands are man-made and could be mitigated off-site to allow equestrian use.	See Master Response MR-BIO-3 in Chapter 2.

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
80.02	03/24/04	Individual	Redfern, Greg	Biology	HHNA	Bikers are doing the damage; increased equestrian use will reduce the damage	See Master Response MR-BIO-4 in Chapter 2.
80.03	03/24/04	Individual	Redfern, Greg	Biology	Weed-free feed	Not available, not economic, not necessary because other mitigation covers	See Master Response MR-BIO-4 in Chapter 2.
80.04	03/24/04	Individual	Redfern, Greg	Public Services and Utilities	Parks, Recreation, and Open Space	Safety during GC constructions should be addressed and mitigated	See Master Response MR-PSU-3 in Chapter 2.
81.01	03/25/04	Individual	Redfern, Susan	Biology	Wetlands	Sawmill site "wetlands" are not natural wetlands, but a drainage destination	See Master Response MR-BIO-3 in Chapter 2.
81.02	03/25/04	Individual	Redfern, Susan	Biology	HHNA	Important that trails be maintained for equestrians and that motor bikes and bicycles be prohibited. Horse people tend to be lovers of the environment	See Master Response MR-BIO-4 in Chapter 2.
81.03	03/25/04	Individual	Redfern, Susan	Biology	Weed-free feed	Ridiculous idea. Impossible to obtain and costs prohibitive.	See Master Response MR-BIO-4 in Chapter 2.
81.04	03/25/04	Individual	Redfern, Susan	Public Services and Utilities	Parks, Recreation, and Open Space	Safety during GC constructions should be addressed and mitigated	See Master Response MR-PSU-3 in Chapter 2.
22.01	03/15/04	Individual	Rodgers, John	Transportation and Circulation	Circulation	Closing of Stevenson will put majority of traffic past RLS school	Comment noted
22.02	03/15/04	Individual	Rodgers, John	Transportation and Circulation	Circulation	Concern over traffic for students at RLS	Comment noted
22.03	03/15/04	Individual	Rodgers, John	Public Services and Utilities	Parks, Recreation, and Open Space	Loss of Collins field results in loss of RLS recreation opportunity	See Master Response MR-PSU-3 in Chapter 2.
92.01	04/06/04	Individual	Rosenthal, Richard H.	Public Services and Utilities	Water Supply and Demand	Project may use a "water saving mechanism"; if so, settlement agreement in Save Our Peninsula Committee et al v. County of Monterey prohibits such use until a stand-alone EIER is completed and certified	See Master Response MR-PSU-2 in Chapter 2.
79.01	03/24/04	Individual	Sawyer, Jean	Biology	Wetlands	Sawmill wetlands are man-made and could be mitigated off-site to allow equestrian use.	See Master Response MR-BIO-3 in Chapter 2.
79.02	03/24/04	Individual	Sawyer, Jean	Biology	HHNA	Bikers are doing the damage; increased equestrian use will reduce the damage	See Master Response MR-BIO-4 in Chapter 2.
79.03	03/24/04	Individual	Sawyer, Jean	Biology	HHNA	Equestrians and hikers maintain the trails and thus restrictions not necessary	See Master Response MR-BIO-4 in Chapter 2.
79.04	03/24/04	Individual	Sawyer, Jean	Biology	Weed-free feed	Not available, not economic, not necessary because other mitigation covers	See Master Response MR-BIO-4 in Chapter 2.
79.05	03/24/04	Individual	Sawyer, Jean	Public Services and Utilities	Parks, Recreation, and Open Space	Safety during GC constructions should be addressed and mitigated	See Master Response MR-PSU-3 in Chapter 2.
40.01	03/22/04	Individual	Shepner, Robert W.	Alternatives	Range of Alternatives	Golf Course in Area PQR would avoid traffic around Lodge area	See Master Response MR-ALT-1 in Chapter 2.
40.02	03/22/04	Individual	Shepner, Robert W.	Public Services and Utilities	Water Supply and Demand	No existing water for project; easements will prevent EOC at Sawmill site; proposes reservoir at Sawmill site and upgrade of Forest Lake reservoir	See Master Response MR-PSU-2 in Chapter 2.
40.03	03/22/04	Individual	Shepner, Robert W.	Biology	Monterey pine forest	MPF should be ESHA, mitigation outside DMF not relevant; how can loss be mitigated?	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
40.04	03/22/04	Individual	Shepner, Robert W.	Public Services and Utilities	Water Supply and Demand	Reclamation Project and this project are intertwined and should be included in DEIR	See Master Response MR-PSU-2 in Chapter 2.
40.05	03/22/04	Individual	Shepner, Robert W.	Question	Question	Why is another course necessary?	40.05
40.06	03/22/04	Individual	Shepner, Robert W.	Other	Housing	Tourist housing is adequate; tourist employee affordable housing inadequate.	40.06
17.01	03/10/04	Individual	Singleton, Mr. And Mrs. Ernest J.	Biology	Bristol Curve	Develop alternative to routing traffic on Bristol Curve due to noise and traffic impact	See Master Response MR-BIO-7 in Chapter 2.
19.01	03/11/04	Individual	Taft, Vladimir	Noise	Spanish Bay Driving Range Parking Lot	Construction Noise at 1124 Majella will >85 dBA and cause distress/hardship Parking lot car door noise will be 24/7 and was not addressed	19.01
19.02	03/11/04	Individual	Taft, Vladimir	Biology	Tree Removal	Parking lot at Spanish Bay will cause heritage trees to be cut	19.02
19.03	03/11/04	Individual	Taft, Vladimir	Air Quality	Long-Term Emissions	Parking lot will affect quality of life and air at 1024 Majella	19.03
19.04	03/11/04	Individual	Taft, Vladimir	Project Description	Spanish Bay Driving Range Parking Lot	Parking lot not properly disclosed in project description	19.04
19.05	03/11/04	Individual	Taft, Vladimir	Noise	Spanish Bay Driving Range Parking Lot	Construct underground at Spanish Bay; reduce lot to 30 spaces, increase separation to 200', add 6' wall, provide access to 1024 Majella from sloat so front of house won't face parking lot.	Comment noted
90.00	04/07/04	Individual	Thompson, J. & E.	Statement	Statement	PBC owners overpaid for property and now seek to recoup w/through excessive development.	Comment noted
14.01	03/08/04	Individual	Tormey, John F.	Statement	Statement	Economic impact/property rights should be taken into account	Comment noted
14.02	03/08/04	Individual	Tormey, John F.	Executive Summary	Land Use	Add reference to LUP and CIP	14.02
14.03	03/08/04	Individual	Tormey, John F.	Executive Summary	Dedication	Objects to "Dedication" terminology	Comment noted
14.04	03/08/04	Individual	Tormey, John F.	Biology	Monterey pine forest	Believes MPF as sensitive community is not protected under law	See Master Response MR-BIO-5 in Chapter 2.
14.05	03/08/04	Individual	Tormey, John F.	Introduction	Private property	Suggests adding reference to Private property	14.05
14.06	03/08/04	Individual	Tormey, John F.	Land Use	Measure A	Consequence of CCC rejection of Measure A (part. to PQR) should be discussed	See Master Response MR-LU-1 in Chapter 2.
14.07	03/08/04	Individual	Tormey, John F.	Public Services and Utilities	Police services	Public Services section thin; police coverage not env. impact; delete tax reference	See Master Response MR-PSU-1 in Chapter 2.
14.08	03/08/04	Individual	Tormey, John F.	Errata	Errata	Air Quality section needs edit	Errata
14.09	03/08/04	Individual	Tormey, John F.	Land Use	Measure A	Clarify cumulative baseline and buildout	See Master Response MR-LU-1 in Chapter 2.
14.10	03/08/04	Individual	Tormey, John F.	Biology	Monterey pine forest	Questions MPF mitigation; concern about constitutional takings (Dolan v. Tigard)	See Master Response MR-BIO-5 in Chapter 2.
14.11	03/08/04	Individual	Tormey, John F.	Biology	Monterey pine forest	Questions MPF as "sensitive community"	See Master Response MR-BIO-5 in Chapter 2.
14.12	03/08/04	Individual	Tormey, John F.	Biology	Yadon's piperia	Questions Accuracy of Yadon's piperia count	See Master Response MR-BIO-6 in Chapter 2.
14.13	03/08/04	Individual	Tormey, John F.	Biology	Bristol Curve	Requests clarification if Bristol curve retained or not	See Master Response MR-BIO-7 in Chapter 2.
14.14	03/08/04	Individual	Tormey, John F.	Errata	Errata	Remove "very", "very", and "substantial"	Errata
14.15	03/08/04	Individual	Tormey, John F.	Land Use	Policy Consistency	Clarify that zoning remains same	14.15
89.01	04/05/04	Individual	Troutman, J.	Biology	Weed-free feed	Weed-free feed not available; requirement unfair and unreasonable.	See Master Response MR-BIO-4 in Chapter 2.
89.02	04/05/04	Individual	Troutman, J.	Biology	HHNA	Opposes restrictions on equestrian trail use; states equestrian use will reduce effect of mountain bikes and motorcycles.	See Master Response MR-BIO-4 in Chapter 2.
89.03	04/05/04	Individual	Troutman, J.	Biology	Wetlands	Advocates "moving" man-made wetlands at Sawmill site	See Master Response MR-BIO-3 in Chapter 2.
21.01	03/15/04	Individual	Verbonec, Rick	Various	Various	Mostly text corrections. Also wants maps of Old Capitol and Aguajito sites.	21.01
71.01	03/22/04	Individual	White, Marie	Biology	Sawmill revegetation	Why was revegetation at Sawmill unsuccessful?	71.01
71.02	03/22/04	Individual	White, Marie	Biology	Spanish Bay permit conditions	Mitigation should only cover new plan, not compliance with Spanish Bay conditions.	71.02

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
71.03	03/22/04	Individual	White, Marie	Biology	Resource Management Plans	Concerns over RMP implementation, oversight, monitoring, and remediation	See Master Response MR-BIO-9 in Chapter 2.
71.04	03/22/04	Individual	White, Marie	Biology	Monterey pine forest	Effect of loss of contiguous open space on biological resources	See Master Reponse MR-BIO-5 and MR-BIO-9 in Chapter 2.
71.05	03/22/04	Individual	White, Marie	Biology	HHNA	Concerns over trail maintenance in HHNA, oversight, monitoring, and funding	See Master Response MR-BIO-4 in Chapter 2.
71.06	03/22/04	Individual	White, Marie	Biology	HHNA	Protocol for temporary trail closures should be identified now as part of EIR review process	See Master Response MR-BIO-4 in Chapter 2.
71.07	03/22/04	Individual	White, Marie	Biology	Monterey pine forest	Residential tree removal estimates and policy	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
71.08	03/22/04	Individual	White, Marie	Biology	Yadon's piperia	What if impacts to YP are larger than estimated? How would this be monitored and mitigated? Oversight?	See Master Response MR-BIO-6 in Chapter 2.
71.09	03/22/04	Individual	White, Marie	Biology	Gowen cypress/Bishop pine	Management for Gowen cypress/Bishop pine forest	71.09
71.10	03/22/04	Individual	White, Marie	Biology	Gowen cypress/Bishop pine	Residential owner compliance with mitigation for Gowen cypress	71.10
71.11	03/22/04	Individual	White, Marie	Biology	Pacific Grove clover	Mitigation if success not met for Pacific Grove clover	See Master Response MR-BIO-8 in Chapter 2.
71.12	03/22/04	Individual	White, Marie	Biology	Sensitive species and habitats	Baseline for assessing impact to Hooker's manzanita	71.12
71.13	03/22/04	Individual	White, Marie	Biology	Sensitive species and habitats	Preconstruction survey for pine rose, qualified individual, records, monitoring, protocols	71.13
71.14	03/22/04	Individual	White, Marie	Public Services and Utilities	Police services	Funding for police services	See Master Response MR-PSU-1 in Chapter 2.
71.15	03/22/04	Individual	White, Marie	Public Services and Utilities	Water Supply and Demand	Are scenarios for rainfall representative?	See Master Response MR-PSU-2 in Chapter 2.
71.16	03/22/04	Individual	White, Marie	Public Services and Utilities	Utilities	Notification of homeowners of outages for utilities	71.16
71.17	03/22/04	Individual	White, Marie	Public Services and Utilities	Parks, Recreation, and Open Space	Impact of loss of contiguous open space on recreation should be addressed	See Master Response MR-PSU-3 in Chapter 2.
71.18	03/22/04	Individual	White, Marie	Public Services and Utilities	Police services	If security guards not increased, this will be a loss in service	See Master Response MR-PSU-1 in Chapter 2.
71.19	03/22/04	Individual	White, Marie	Transportation and Circulation	Construction	How will PBC enforce speed controls for construction?	71.19
71.20	03/22/04	Individual	White, Marie	Transportation and Circulation	DMF traffic	Maintenance of roads in forest, particularly Congress	71.20
67.01	03/22/04	Individual	Wiltse, Mary	Public Services and Utilities	HHNA	Let PBC and PBEC manage the trails.	HHNA
67.02	03/22/04	Individual	Wiltse, Mary	Biology	Wetlands	Sawmill wetlands are "take" wetlands; should be graded.	See Master Response MR-BIO-3 in Chapter 2.
67.03	03/22/04	Individual	Wiltse, Mary	Biology	HHNA	Closing trails to equestrian use is unnecessary and unfair; improve Green Trail; focus on non-natives; keep illegal bicyclist and motorbike riders off trails instead.	See Master Response MR-BIO-4 in Chapter 2.
67.04	03/22/04	Individual	Wiltse, Mary	Biology	Weed-free feed	Don't require weed-free feed - not available in state; don't direct manure disposal.	See Master Response MR-BIO-4 in Chapter 2.
8.01	02/26/04	Individual	Wyly, Phillips	Biology	Monterey pine forest	Questions adequacy of preservation as mitigation for forest loss	See Master Response MR-BIO-5 in Chapter 2.
8.02	02/26/04	Individual	Wyly, Phillips	Hydrology and Water Quality	Pesticides and Fertilizers	Runoff affect wetlands and Monterey Bay	8.02
8.03	02/26/04	Individual	Wyly, Phillips	Biology	Wetlands	Retrieval of errant golf balls affect wetlands	See Master Response MR-BIO-3 in Chapter 2.
8.04	02/26/04	Individual	Wyly, Phillips	Public Services and Utilities	Water Supply and Demand	Questions basis of PBC entitlement, cumulative impact, and specificity of mitigation	See Master Response MR-PSU-2 in Chapter 2.
8.05	02/26/04	Individual	Wyly, Phillips	Transportation and Circulation	Construction	Construction traffic impact on RLS parking and emergency reponse time	See Master Response MR-TC-2 in Chapter 2.
8.06	02/26/04	Individual	Wyly, Phillips	Transportation and Circulation	Circulation	Concern about widening of Forest Lake Road and RLS access	8.06
8.07	02/26/04	Individual	Wyly, Phillips	Transportation and Circulation	DMF traffic	Has a realistic study of forest traffic been completed?	8.07
8.08	02/26/04	Individual	Wyly, Phillips	Air Quality	Long-Term Emissions	Has a study been done concerning increased smog levels?	8.08
8.09	02/26/04	Individual	Wyly, Phillips	Noise	Long-Term Noise	Has a study been done concerning increased traffic noise?	8.09
8.10	02/26/04	Individual	Wyly, Phillips	Mitigation Monitoring	Enforcement	Questions implementation. Supports PBC funding of monitoring.	See Master Response MR-GEN-3 in Chapter 2.
69.01	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Executive Summary	Format	ES and DEIR should be consistent.	69.01
69.02	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Statement	Statement	CNPS is a private organization (also 43, 44, 45, 46)	Comment noted
69.03	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Project Description	Trails	Applicant-proposed trail changes	69.03
69.04	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Project Description	Utilities	Applicant-proposed addition of sewer line	69.04
69.05	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Project Description	Trails	Update Figure 2.0-32	69.05
69.06	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Project Description	Legal Lots	Applicant view on legal lots	69.06
69.07	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Project Description	Trails	Applicant-proposed trail changes	69.07
69.08	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Statement	Statement	68% of people voted for Measure A	Comment noted
69.09	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Geology, Seismicity, Soils	Steep Slopes	Suggests building envelopes as alternative measure	69.09
69.10	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Errata	Errata	Wording change	Errata
69.11	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Monterey pine forest	Questions necessity of regional conservation plan and validity of 5% threshold	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
69.12	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	ESHA definition	Seedliff buckwheat is not ESHA	See Master Response MR-BIO-1 in Chapter 2.
69.13	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Dune habitat and species	Project will not remove dune habitat and will correct existing disturbance	See Master Response MR-BIO-2 in Chapter 2.
69.14	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Dune habitat and species	Dunes report has adequate mitigation measures for impact to dunes and species	See Master Response MR-BIO-2 in Chapter 2.
69.15	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Dune habitat and species	Dunes mitigation consistent with dunes report	See Master Response MR-BIO-2 in Chapter 2.
69.16	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Dune habitat and species	Golf carts should be allowed on trail through dunes; elevation not needed to avoid impacts; impacts covered by restoration.	See Master Response MR-BIO-2 in Chapter 2.

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
69.17	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Dune habitat and species	Replace 42" high fence to allow fencing, landscaping, or other appropriate barriers	See Master Response MR-BIO-2 in Chapter 2.
69.18	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Seasonal pond	Characterization of pond's values overstated; 40 foot buffer not needed for shading; alternative proposed as 25' instead of 40'.	69.18
69.19	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Gowen cypress/Bishop pine	Revision of Lot 1 at F-3 not necessary to avoid ESHA.	69.19
69.20	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	HHNA	Concur with DMFPO comments on Mitigation Measure BIO-A5.	See Master Response MR-BIO-4 in Chapter 2.
69.21	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Monterey pine forest	Characterization of forest as undeveloped is overstatement	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
69.22	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Monterey pine forest	Assumption of residential conversion is overly conservative.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
69.23	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Monterey pine forest	Golf course forest is not relatively intact/is fragmented.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
69.24	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Monterey pine forest	Disagree that forest removal would make retained forest less resistant to impact.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
69.25	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Monterey pine forest	Question significance conclusion	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
69.26	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Monterey pine forest	Reference to Appendix E-3 incorrect; applicant should received credit for prior dedications at HHNA	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
69.27	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Monterey pine forest	Building envelopes too restrictive; propose 0.75 acres and county condition for areas outside envelope	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
69.28	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Monterey pine forest	15-acre restoration area needs to be managed as part of golf course; conditions of approval should replace negative easement.	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.
69.29	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Wetlands	Project will avoid grading in wetlands; change reference to holes	See Master Response MR-BIO-3 in Chapter 2.
69.30	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Wetlands	Change reference to holes	See Master Response MR-BIO-3 in Chapter 2.
69.31	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Wetlands	Clear-span bridges not needed to mitigate impact	See Master Response MR-BIO-3 in Chapter 2.
69.32	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Yadon's piperia	Impacts to YP overstated; mitigation is excessive; including Bristol Curve retention	See Master Response MR-BIO-6 in Chapter 2.
69.33	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Yadon's piperia	YP at GC is one of several in DMF	See Master Response MR-BIO-6 in Chapter 2.
69.34	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Yadon's piperia	Prior CDFG mitigation implemented by proposed project.	See Master Response MR-BIO-6 in Chapter 2.
69.35	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Yadon's piperia	Residential impacts overstated	See Master Response MR-BIO-6 in Chapter 2.
69.36	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Yadon's piperia	Preservation does not account for YP unaffected by project.	See Master Response MR-BIO-6 in Chapter 2.
69.37	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Yadon's piperia	A fragmented occurrence at the GC can be managed and will be viable.	See Master Response MR-BIO-6 in Chapter 2.
69.38	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Yadon's piperia	Redesign would not further impact on YP.	See Master Response MR-BIO-6 in Chapter 2.
69.39	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Yadon's piperia	Project will not affect recovery of species.	See Master Response MR-BIO-6 in Chapter 2.
69.40	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Yadon's piperia	Temporary fencing instead of permanent fencing at GC.	See Master Response MR-BIO-6 in Chapter 2.
69.41	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Gowen cypress/Bishop pine	Development envelope will avoid Gowen Cypress/Bishop Pine	69.41
69.42	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Pacific Grove clover	Mitigation for PG clover should include a new assessment of the extent and presence and be tuned to current conditions.	See Master Response MR-BIO-8 in Chapter 2.
69.43	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	CNPS	"Please note that CNPS is a private environmental advocacy group whose decisions are subject to neither procedural nor substantive due process safeguards."	69.43
69.44	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	CNPS	"Please note that CNPS is a private environmental advocacy group whose decisions are subject to neither procedural nor substantive due process safeguards."	69.44
69.45	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	CNPS	"Please note that CNPS is a private environmental advocacy group whose decisions are subject to neither procedural nor substantive due process safeguards."	69.45
69.46	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	CNPS	"Please note that CNPS is a private environmental advocacy group whose decisions are subject to neither procedural nor substantive due process safeguards."	69.46
69.47	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	California red-legged frog	See comment #69.18 regarding overstory clearing	69.47
69.48	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	California red-legged frog	Change wording for CRLF breeding requirement	69.48
69.49	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Hydrology and Water Quality	Stormwater runoff	Difference in WWD and Balance Hydrologics study explained by assumptions.	This comment is noted
69.50	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Hydrology and Water Quality	Stormwater runoff	Project complies with County guidelines; HWQ-B1-1 not necessary.	69.50
69.51	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Hydrology and Water Quality	Pesticides and Fertilizers	Triclopyr description	This comment is noted
69.52	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Public Services and Utilities	Police services	Assumptions about daily visitors in DEIR overestimate likely amount	See Master Response MR-PSU-1 in Chapter 2.
69.53	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Public Services and Utilities	Police services	Applicant payed taxes will be more than adequate to cover police services, if provided.	See Master Response MR-PSU-1 in Chapter 2.
69.54	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Aesthetics	Visual character	GC simulation shows too little forested buffer.	69.54
69.55	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Aesthetics	Visual character	SB Employee Housing shows too little forest buffer and too close to the road.	69.55
69.56	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Transportation and Circulation	Construction	Construction sequencing could be different as well as duration	See Master Response MR-TC-2 in Chapter 2.
69.57	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Transportation and Circulation	Highway 68	Calculation of fair share for 68/Skyline mitigation	See Master Response MR-TC-1 in Chapter 2.
69.58	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Transportation and Circulation	Highway 68	Calculation of fair share for 68/Beverly mitigation	See Master Response MR-TC-1 in Chapter 2.
69.59	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Transportation and Circulation	Highway 68	Calculation of fair share for 68/Aguajito mitigation; no need for mitigation	See Master Response MR-TC-1 in Chapter 2.
69.60	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Transportation and Circulation	Alternative Transportation	Mitigation for trip reduction not needed because of existing shuttles and proposed employee housing.	69.60
69.61	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Air Quality	Construction	Mitigation not needed for Diesel TAC and local contractors have no retrofitted equipment; impact not significant.	69.61
69.62	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Monterey pine forest	Cap should be 20%; mitigation should not specify location	See Master Response MR-BIO-5 and MR-BIO-9 in Chapter 2.

Table 5-2  
PBC DMF/PDP DEIR Comments  
By Author

#	Date	Type	Commenter	General Subject	Specific Subject	Specific Issues	Response or Master Response
69.63	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Yadon's piperia	Same comments as direct impacts	See Master Response MR-BIO-6 in Chapter 2.
69.64	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Public Services and Utilities	Police services	No impacts on police services	See Master Response MR-PSU-1 in Chapter 2.
69.65	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Air Quality	Construction	Mitigation not needed for Diesel TAC and local contractors have no retrofitted equipment; impact not significant.	69.65
69.66	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Transportation and Circulation	Intersections outside the DMF	Impact to 1/Ocean and 1/Carmel Valley is less than significant per criteria.	69.66
69.67	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Transportation and Circulation	Highway 68	Project improves v/c ratio at 68/1 intersection.	See Master Response MR-TC-1 in Chapter 2.
69.68	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Transportation and Circulation	Intersections outside the DMF	Impact to 1/Carpenter and 1/Rio is less than significant per criteria.	69.68
69.69	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Alternatives	Feasibility	9-hole alternative is infeasible and does not meet project objectives	69.69
69.70	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Alternatives	Project objectives	No golf course alternative does not meet project objectives	69.70
69.71	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Alternatives	Environmentally superior alternative	Proposed Project is Environmentally Superior Alternative	69.71
69.72	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Alternatives	No project	No project alternative should note 41 single-family residences could occur on PBC lots	69.72
69.73	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Land Use	Policy Consistency	Condition to restrict extra parking beyond 2 spaces should be deleted.	See Master Response MR-LU-1 in Chapter 2.
69.74	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Land Use	Policy Consistency	Golf carts should be allowed on trail between Hole 14 and Hole 15	See Master Response MR-LU-1 in Chapter 2.
69.75	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Land Use	Policy Consistency	Golf carts should be allowed on trail between Hole 14 and Hole 15	See Master Response MR-LU-1 in Chapter 2.
69.76	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Yadon's piperia	YP taxonomy history	See Master Response MR-BIO-6 in Chapter 2.
69.77	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Wetlands	Setting for particular wetland should be added.	See Master Response MR-BIO-3 in Chapter 2.
69.78	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Biology	Sensitive species and habitats	Monterey manzanita not known to occur in DMF.	69.78
69.79	03/22/04	Applicant	Pebble Beach Company (Lombardo & Gilles)	Errata	Errata	See comment letter	Errata



## Federal Agencies

## **93 National Oceanic and Atmospheric Administration (NOAA) Fisheries**

- 93.01 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

## 107 NOAA Fisheries

- 107.01 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 107.02 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 107.03 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 107.04 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

## 94 U.S. Fish and Wildlife Service (USFWS)

- 94.01 This comment is noted. Comment supports revisions to PBC's development plans, and preservation of listed plant species in Areas PQR, G, H, I-1, and L.
- 94.02 Comment noted. DEIR Mitigation Measure BIO-D5-1 (Chapter 3.3, Biological Resources) requires the applicant to obtain an incidental take authorization under the federal Endangered Species Act (ESA) from USFWS (either through Section 10 or Section 7 processes), and incorporate all measures required by USFWS into the site-specific RMPs. The incidental take permit (ITP) or final Biological Opinion shall be obtained prior to the issuance of any grading permit, approval of any final map, or approval of the site-specific RMPs.
- 94.03a This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources in MR-BIO-6 in Chapter 2.
- 94.03b This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 94.03c The commenter is correct. Figure 2.02 incorrectly shows area Y as part of area PQR. A revised figure is included herein.
- 94.03d-h This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 94.04 This comment is noted. Comment supports recommendation for active management and preservation of Monterey clover populations in Area G.
- 94.05 Gowen cypress were planted at the Sawmill site as part of the restoration plantings conducted as mitigation in association with the original Spanish Bay resort project and the construction of the S.F.B. Morse Gate and S.F. B. Morse Drive. The EIR and CDP Permit 3-84-226 for the Spanish Bay project described the loss of forest as approximately 32 acres of forest including: 7 acres at the resort hotel site (native forest containing Monterey pine and coast live oak); 9 acres at the golf course site (native forest containing Monterey pine and coast live oak); 6 acres at the Sawmill site (native forest containing Monterey pine and live oak); 9-acres at the Sawmill site (disturbed formerly mined areas containing planted Monterey pine and planted Gowen cypress) and one acre for the construction of S.F.B. Morse Drive (native Monterey pine/Bishop pine forest). Mitigation described in the Spanish Bay EIR was noted as including replanting of about 18 acres of forestland at the Sawmill site, 8 acres of forest at the Spanish Bay Resort site, and rehabilitation of 12-acres of riparian vegetation at the golf course site. The later approval of a conveyor belt to transport sand from the Sawmill site Spanish Bay is noted as requiring minimal tree removal (19 Monterey pines and 16 live oaks). While the Spanish Bay Resort and golf course developments

were noted as affecting special-status plant species, no special-status plant species were identified in the Sawmill site and S.F.B Morse Drive alignment in surveys at the time (CCC 1984; County of Monterey 1985, 1984a, 1984b, 1984c, 1984d). Gowen cypress was not listed at the time of the prior Spanish Bay development; it was listed as endangered by the USFWS in 1998.

The record would seem to identify that the prior project would affect planted Gowen cypress in the disturbed part of the Sawmill site, but did not specifically identify removal of native Gowen cypress as a project impact. It appears that the prior project mitigated loss of planted Gowen cypress in disturbed parts of the Sawmill site by planting of Gowen cypress in disturbed parts of the Sawmill site.

With implementation of the current Proposed Project and the required mitigation in the DEIR, the PRDEIR, and the FEIR, the following changes would occur relevant to HHNA and the surrounding area:

- Preservation of about 143 acres (Area D, a portion of Area F-3, a forested portion of the Corporate Yard Area, Area F-1, Areas G and H) directly adjacent to the HHNA through dedication of new conservation easements. The northern part of Area F-3 contains native Gowen cypress.
- Restoration of about 1.6 acres of Gowen cypress/Bishop pine in a former skeet shooting location in the HHNA.
- Funding for and implementation of resource management of HHNA and the new dedication areas.

Figure F2-1 in Chapter2 shows a comparison of the Huckleberry Hill Natural Area and surrounding area in terms of preservation with and without the project. The “without project” figure presumes that the Sawmill site is restored as required by prior conditions and is integrated into the HHNA. The “with project” figure presumes that the Sawmill site, Area F-3, and the Corporate Yard Employee Housing are developed as proposed, the preservation areas proposed by the applicant are dedicated, and the additional areas required as mitigation are also preserved.

It is County’s conclusion that the Proposed Project, as mitigated, would adequately mitigate not only the environmental impacts of the Proposed Project, but also the original impacts of the Spanish Bay Resort for which restoration and prior dedication of the Sawmill site were previously required, including impacts to Gowen cypress. In specific, with the Proposed Project and the proposed mitigation, the overall resultant preserved area in and around HHNA will be substantially expanded and managed for sensitive resource in a manner such that the ecological values of the HHNA and surrounding area will be preserved in the long run in a manner at least equivalent to the intention of the original mitigation concerning the Sawmill site.

- 94.06 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans and MR-LU-02 regarding easements in Chapter 2.
- 94.07 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 94.08 This comment is noted. Comment supports Mitigation Measure BIO-D6 and dune restoration to include revegetation with seacliff buckwheat. Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.

94.09 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.

## State Agencies

## 42 Caltrans - California Department of Transportation, District 5

- 42.01 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 42.02 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 42.03 This comment is noted. The comment stated that the applicant should contact Caltrans Traffic Management Coordinator Shayne Sandeman, (805) 594-6169 to determine if traffic management plans would be required.
- 42.04 Please see Master Response for Hydrology and Water Quality HWQ-MR-1 Horse Manure in Chapter 2.
- 42.05 Chapter 3.8, Section A, of the DEIR discusses consistency of the Proposed Project with the most recent MBUAPCD Air Quality Management Plan (AQMP), which is the 2000 AQMP. A review of project consistency with the AQMP was conducted by the Association of Monterey Bay Area Governments (AMBAG) for residential components of the Proposed Project and by MBUAPD for visitor-serving components of the Proposed Project. Residential components of the Proposed Project are consistent with the 2000 AQMP. Visitor-serving uses were found to be inconsistent with the current (year 2000) AQMP. However, revisions to the AQMP later this year will accommodate the Proposed Project, at which time the visitor-serving uses would be consistent. In addition, the proposed roadway improvements are reflected in the most recent Regional Transportation Plan (adopted in 2002), prepared by the Transportation Agency for Monterey County, which is part of the air quality planning process.
- 42.06 State Route (SR) 68 is a designated scenic highway from State Route 1 in Monterey to the Salinas River. The portion of the highway that runs along the eastern and northern sides of the Del Monte Forest is not designated as scenic. The areas planned for development that are in closest proximity to SR 68 are the Proposed Spanish Bay driving range, the corporation yard, and New Equestrian Center. Due to intervening vegetation and topography between SR 68 and the areas that would be developed under the Proposed Project, these areas would generally not be visible from SR 68 with the exception of the SR 1/SR 68/17-Mile Drive intersection. Aesthetic impacts of the intersection improvements were discussed in the DEIR.
- 42.07 Comment notes that the DEIR and FEIR will not satisfy all the environmental review requirements for issuance of a Caltrans encroachment permit for Phase 1B improvements because the DEIR does not specifically break out the impacts within the state right-of-way and because the DEIR does not include the actual resource survey reports.

The DEIR does disclose significant specific impacts related to Phase 1B for all subjects analyzed. At the beginning of each DEIR section, there is a summary matrix and impacts associated with the Phase 1B improvement are noted under the "HWY" column and discussed in the text for that particular impact. However, given the length of the document and the multiple project locations, if elaborating detail was not directly relevant to the impact analysis and conclusions, it was not provided in the DEIR itself.



The analysis of environmental effects of Phase 1B was based on resource survey reports conducted specifically for Phase 1B as identified by the references in Chapter 7:

- Fehr & Peers. 2003 Estimate of Construction Traffic Impact of Phase 1B Project. October 8.
- Fehr & Peers. 2002. Traffic Operations Report, Route 68 Encroachment Permit Project. February.
- LSA Associates, Inc. 2001. Biological Resources Report Highway 68/Highway I/17 Mile Drive Intersection Improvement Project Newport Beach, CA.
- LSA Associates, Inc. 2001. Noise Analysis: Highway 68/Highway 1/17-Mile Drive Intersection Improvement Project. December 19. Irvine, CA. Prepared for Brian Foucht, Carmel Development Company. Salinas, CA.
- LSA Associates, Inc. 2001. Visual Impact Assessment Highway 68/Highway 1/17 Mile Drive Intersection Improvement Project. Prepared for Carmel Development Company.
- Parikh Consultants. 2001. Geotechnical design & materials report, Route 68 widening project, phase 1B interim improvement, Monterey County, California. Milpitas, CA.
- Staub Forestry and Environmental Consulting. 2001. Forest Management Plan for Phase 1B Interim Improvements Route 68 Widening/Improvement Project. Felton, CA. Prepared for Lombardo and Gilles.

Several references were inadvertently left out of the reference list. These have been added, including:

- LSA Associates, Inc. 2001. Air Quality Analysis Highway 68/Highway 1/17 Mile Drive Intersection Improvement Project. Prepared for Carmel Development Company. December 19.
- LSA Associates, Inc. 2001. Archeological Study Highway 68/Highway 1/17 Mile Drive Intersection Improvement Project. Prepared for Carmel Development Company. December 19.
- Mark Thomas & Associates. 2001. Conceptual Storm Water Pollution Prevention Plan for Route 68/1 Ramp and Pebble Beach Entrance Improvement Project. Prepared for Pebble Beach Company. December 2.

Although not referenced, these reports were also peer reviewed by Jones & Stokes during preparation of the DEIR prior to making significance conclusions regarding Phase 1B related to these subjects.

The comment does not identify any specific inadequacy, it merely notes that the encroachment permit application will require further detail to support Caltrans permit process. The detail should be found within the specific resource reports noted above.

Additional text is added to the DEIR as described in Chapter 3 to clarify to the reader that potential land use, hydrology and water quality, and cultural resources issues for Phase 1B were considered.

- 42.08 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 42.09 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.

## 58 CCC - California Coastal Commission

- 58.01 This comment is noted, and generally addresses issues that are elaborated upon in subsequent comments and responded to below. Because the County's review of the issues raised by the CCC staff's comments (including, but not limited to Environmental Sensitive Habitat Areas (ESHA)) did not identify any issues that warranted revisions that would require further recirculation of any such revisions per CEQA requirements, further recirculation is not required.
- 58.02 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 58.03 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2. The Master Response and the DEIR describe adequately that amendments of CDP permit conditions adopted by the CCC, including the Upper Sawmill site easement will need to occur in order for the project to proceed. Similarly, Master Response for Land Use MR-LU-1 notes that certification of Measure A will need to occur in order for any contingent approval by the County to be valid, and that lack of certification will require amendment to the project application and further processing by the County. Although the CCC staff have recommended that Measure A be reviewed for potential certification prior to County consideration of the project, since any County's potential approval would be conditioned on certification of Measure A and required amendment of CCC permit conditions and related easements, there does not appear to be any procedural problem in proceeding with the current permit review process. In the end, regardless of sequencing, the currently Proposed Project will require action by both Monterey County and the CCC to proceed without further permit processing and review.
- 58.04 Please see Master Response for Biological Resources MR-BIO-1 Environmental Sensitive Habitat Areas (ESHAs) in Chapter 2.
- 58.05 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 58.06 Please see Master Response for Biological Resources MR-BIO-1 Environmental Sensitive Habitat Areas (ESHAs) in Chapter 2.
- 58.07 Regarding Monterey pine forest, please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2. Regarding Yadon's piperia, please see the response to Comment 58.08 (below). Regarding other species, the comment is non-specific as to why the DEIR analysis is inadequate without quantification of indirect effects. Regarding other special-status plants, the DEIR does qualitatively address indirect effects (see for example p. 3.3-45 through 3.3-48). Another example of how indirect effects were addressed is the analysis of impacts of runoff and pesticide and herbicide use in Chapters 3.3 and 3.4 of the DEIR.

Indirect effects are difficult to accurately quantify as the change above baseline can vary with distance and separation from the source impact. Throughout the Del Monte Forest, numerous special-status plants and wildlife species are found in remnant habitat in close proximity to development, including golf courses, driving ranges, residences, and roads. For example, the population of California red-legged frog found in Seal Rock Creek is adjacent to the Spyglass Hill Golf Course, 17-Mile Drive, residences, and roads. While these resources are likely indirectly affected, they are present in adjacent areas, showing that the adjacent development has not resulted in extirpation of the resource through indirect effects to date. Thus, the suggestion to treat indirect effects as direct effects is an overly conservative methodology that is likely to

significantly overstate project effects. Because the DEIR and PRDEIR adequately take into account indirect effects in the analysis, no further revision of the document is warranted, absent specificity as to the alleged inadequacy of the analysis of indirect effects.

- 58.08 This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 58.09 The assessor parcel numbers of all parcels affected by the Proposed Project are identified in Table 2.0-1 of the DEIR. Chapter 3.1, Land Use, of the DEIR discusses the compatibility of proposed land uses with the LCP, County code, General Plan, and Measure A. Legal descriptions of the parcels and information related to chain of ownership of the parcels is available from the County Planning and Building Inspection Department and is not considered necessary for the analysis of environmental impacts under CEQA.
- 58.10 As stated in the DEIR (Chapter 3.1, Land Use), an offer to dedicate the HHNA and the upper Sawmill Gulch area was made by the applicant in 1987 as required by the CCC. This is the easement required by County Permit PC-5202 and CCC permit 3-84-226.
- However, according to Figure 2 in the Del Monte Forest LUP, the Sawmill site is not designated "terrestrial sensitive habitat" or "rare plant" areas designated as ESHA. According to Figure 5 and Figure 10 A in the LUP, neither the upper or lower Sawmill appears to be within the identified boundary of the HHNA. The easement intended for the Sawmill site to be included within the "Huckleberry Hill Open Space". Although this is similar to the terminology used for the HHNA, a legal LCP amendment was not made. The 1984 LCP designates the boundaries of the HHNA as shown on Figure 2.0-2, Development and Preservation Areas, in the DEIR.
- 58.11 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 58.12 A detailed history of the uses of the Spyglass Quarry is not necessary to analyze environmental impacts of the Proposed Project at the quarry site. CEQA requires analysis of impacts relative to the existing environmental conditions. The impacts of the Proposed Project on the Spyglass Quarry site relative to existing conditions are discussed in the resource chapters in the DEIR. The site is designated for residential development in the LCP, which allows use of this site for a golf course. Consistency with the LUP is discussed in Appendix D, Land Use Plan Policy Consistency in Volume II of the DEIR.
- 58.13 DEIR Chapters 3-1 – 3.10 use the existing environmental setting in the DMF as a baseline for analysis of project impacts.

DEIR Chapter 4.4, Cumulative Impacts, uses the existing LUP as the baseline to identify potential buildout for the document. Potential buildout of the DMF, exclusive of the Proposed Project areas, consists of the potential development of existing lots and potential future subdivision where allowable by the LUP. Thus, the existing LCP buildout projections (without project) are 1,078 additional residential dwelling units and no additional visitor-serving units.

Use of buildout projections based on the legal subdivision limit of the 1984 LCP is a more conservative analysis than CCC's proposed buildout projections based on existing legal lots and a site-specific determination of environmental constraints (which is not feasible on the scale requested). Because it likely overstates the buildout that will actually occur, DEIR conclusions about the 1984 LCP avoid understating potential cumulative impacts. Use of buildout projections is thus an adequate methodology for cumulative analysis. The CCC-requested analysis, while perhaps useful to refine the estimate of "realizable" buildout, is not necessary for impact analysis of the Proposed Project or to make conclusions in the DEIR regarding the Proposed Project.

Further, the CCC request in effect asserts that cumulative analysis is inadequate unless a detailed site-specific identification of environmental constraints, building envelopes, and economic feasibility is conducted for every potential legal lot or potential subdivision area within the Del Monte Forest. As noted above, this is not necessary for an adequate cumulative analysis and further is practically infeasible. It is a standard and accepted professional practice to use a projection from the adopted land use plan to estimate buildout for cumulative impacts under CEQA and commonly used by Monterey County and countless other CEQA lead agencies. The CCC itself, when evaluating Coastal Development Permits for areas where it exercises original jurisdiction, does not conduct such detailed buildout analysis for the purposes of supporting its determinations under the Coastal Act, and it is unreasonable, infeasible, and unnecessary to request other CEQA lead agencies to conduct such analysis.

- 58.14 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.
- 58.15 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 58.16 This comment is noted, and generally addresses issues that are elaborated upon in the responses provided above. Regarding recirculation see response to 58.01.

## 78 CDFG - California Department of Fish & Game

78.01 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.

78.02 Comment suggests that DEIR identify maritime chaparral habitats so that impact assessment and mitigation measures can be evaluated. As stated in the DEIR (Chapter 3.3, Biological Resources, Environmental Setting section), central maritime chaparral commonly occurs in the Del Monte Forest within Monterey pine forest, as an understory assemblage. It is common practice to characterize habitat by the dominant vegetation, which is Monterey pine forest within most of the project site forested areas. Area F-3 has an area of Bishop pine/Gowen cypress forest, which is the only forest project area not mapped as Monterey pine forest. Monterey pygmy forest is found within HHNA, but this is not a project site.

In Appendix E, maritime chaparral is described generally as an understory association and maritime chaparral species (such as a variety of manzanita species) are noted as understory elements within individuals project sites. While there are several small areas within HHNA where the tree canopy is open and maritime chaparral species constitute the dominant vegetation over a small area, no such open chaparral areas are known within project development areas.

Thus, the project's effects on maritime chaparral are best characterized within the context of the project's effect on the dominant vegetation community, which is the Monterey pine forest. Additional mapping of the understory occurrence within development sites or the occurrences within existing or proposed would not add substantial new evidence that would alter the conclusions of the DEIR regarding project effects on sensitive vegetation communities.

While not mapped, the applicant-proposed and additionally required preservation areas for Monterey pine forest contain extensive areas wherein maritime chaparral species are found as the understory. Since the overall preservation ratio is in excess of 6:1, it is reasonably to conclude that far greater areas of Monterey pine forest with maritime chaparral understory will be preserved than that removed due to project development.

Where maritime chaparral species, such as Hooker's manzanita or sandmat manzanita are rare as an individual species, the DEIR specifically describes project effect's on those species.

No revision to the DEIR is necessary concerning maritime chaparral.

78.03 Please see Master Response for Biological Resources MR-BIO-8 Pacific Grove Clover.

78.04 Comment asserts that the distribution of Monterey clover is more widespread (Areas F-2, F-3, G, Haul Road, Sawmill Gulch) than the DEIR describes and thus impacts may not have been fully identified. DEIR Appendix E, Biological Resources Setting, pages E-21—E-22, contain species, distribution, and habitat descriptions for Monterey clover. Monterey clover is a fire follower; only appearing in large numbers after a fire has removed the vegetative cover. Monterey clover populations observed in the 1995 report may have been the result of growth following the 1987 fire at Huckleberry Hill and/or 1990 fire at the Presidio of Monterey. However, the only location that Monterey clover is currently observed in is on the extreme northern portion of Area G, occupying an estimated 8.2 acres of habitat. The Proposed Project would place Area G under a conservation and scenic easement, thereby preserving existing Monterey clover habitats within the DMF. The prior mapping of Monterey Clover (Jones & Stokes 1996) was reviewed pursuant

to this comment. The prior locations mapped along the Haul Road, along Sawmill Gulch are within the previously preserved HHNA/SFB Morse Reserve; thus the project would not remove habitat in these areas. Area G will be preserved as noted above. The prior area near Area F-3 is well north of the proposed residential lot area and may be within the proposed conservation area. However, this area was mapped prior to the construction of Poppy Hills Golf Course; given the mapped location it may have been partially or entirely extirpated by prior golf course development. At any rate, it does not appear that the residential development in the Proposed Project would affect the formerly mapped occurrence.

The prior area near or in Area F-2 was mapped prior to the construction of Poppy Hills Golf Course. Given the mapped location it may have been partially or entirely extirpated by prior golf course development. Jones & Stokes botanists visited this location with Vern Yadon who was the local botanist who had previously reported that Monterey clover had been present in the area. He could not specifically relocate the prior occurrence area given that the site had been altered since the late 1980s when Monterey Clover was last seen in or near the occasion. Mr. Yadon identified that in the 1980s, there was some local burning of wood refuse conducted on the site, and it is possible that the fire activity is the reason Monterey clover was previously seen. Mr. Yadon identified that he has not seen Monterey clover on the site in more recent inventory surveys conducted for the applicant for the Proposed Project.

Without fire, it is impossible to conclude whether Monterey clover is present on a part of Area F-2 or was extirpated by construction of the adjacent Poppy Hills Golf Course. Given the fragmented nature of Area F-2, and its location directly adjacent to the Poppy Hills Golf Course, management of this area with fire to remove overstory is not considered likely or feasible. At any rate, it is considered speculative to assert that Monterey clover is extant at Area F-2, given that it has not been documented in 20 years and more recent botanical surveys have not identified it as present. Thus, the DEIR's conclusion of no effect on this species is based on the evidence available. Conversion of part of Area F-2 to residential lots is not likely to forego any reasonable opportunity to restore or recover the species within Area F-2. Management options for current known locations (Area G) or other former locations will be enhanced by formal preservation and the provision of applicant funding for resource management. As such, the project is not expected to result in a significant impact to Monterey clover.

- 78.05 Comment expresses concern that the DEIR does not recommend buffers for special-status plants and sensitive vegetation communities, and that no analysis of indirect effects such as trampling, fire hazard abatement, fire suppression, overspray with water, pesticides, and fertilizer application has been completed. The comment is incorrect that no buffers have been identified for special-status plants or communities and that the DEIR does not assess indirect effects. DEIR Impacts BIO-D1—BIO-D4 address potential direct and indirect impacts of the Proposed Project on special status plant species. Impact BIO-A1 discussed dune areas and dune plants Impact BIO-A3 and C-1 assessed effects to wetlands.

In cases where buffers around sensitive species are identified as necessary to reduce impacts to a less than significant level, such mitigation has been included. The following special-status plant species were addressed in the DEIR and PRDEIR. Mitigation for wetlands and dune plants/habitat were revised per this comment and other comments on the DEIR:

- **Yadon's piperia.** Direct and indirect impacts on Yadon's piperia are addressed in Chapter P2, Yadon's Piperia, of the PRDEIR. Mitigation Measure BIO-D1-3 (PRDEIR) requires permanent dedication of additional preservation areas for Yadon's piperia,

including all forested areas within a 50-foot buffer of occurrences in Areas F-1, J, K, Old Capital site, and Aguajito.

- **Gowen cypress.** DEIR Impact BIO-D2 addresses potential loss or disturbance of up to 20 Gowen cypress trees. Direct and indirect impacts are identified. Mitigation Measure BIO-D2 requires avoiding direct loss and indirect effects on individual Gowen cypress trees through a setback buffer from the edge of the residential development to 3 times the canopy radius.
- **Hooker's manzanita.** DEIR Impact BIO-D4 addresses potential loss or disturbance of 45 acres of Hooker's manzanita. Direct and indirect impacts are identified. The occurrences of Hooker's manzanita on Areas F-2, F-3, and I-2 are already fragmented by development, and the largest occurrence of Hooker's manzanita found in DMF would be preserved and protected in perpetuity within the HHNA. Buffers were not identified as necessary to reduce project effects to a less than significant level.
- **Hickman's onion.** DEIR Impact BIO-D4 addresses potential loss or disturbance of 0.02 acres of Hickman's onion in Area MNOUV. Direct and indirect impacts are identified. The Proposed Project would result in a preserved/removed ratio of more than 100:1 by preserving a much larger occurrence in Area PQR and a smaller area in F-3 as well as conducting restoration activities. Buffers were not identified as necessary to reduce project effects to a less than significant level.
- **Pine rose.** DEIR Impact BIO-D4 addresses disturbance to occurrences of pine rose on 5 sites. Mitigation Measure BIO-D4 requires avoidance and protection of pine rose occurrences where feasible, and removal and replanting occurrences where not feasible. Buffers were not identified as necessary to reduce project effects to a less than significant level.
- **Sandmat manzanita.** DEIR Impact BIO-D4 addresses potential loss or disturbance of sandmat manzanita at 3 sites. The potential loss of individual sandmat manzanita habitat is not identified as a substantial adverse effect, particularly in the context of the preservation of the significant occurrence of sandmat manzanita in Area PQR as well as smaller occurrences elsewhere. Buffers were not identified as necessary to reduce project effects to a less than significant level.
- **Wetlands.** Various buffers were provided in the applicant's proposal and were expanded in certain instances in the DEIR. Please see Master Response BIO-3, Wetlands in Chapter 2. Revisions to Mitigation Measure BIO-C1-1 in this Final EIR (see Chapter 3) will require a 100-foot buffer for the wetland ESHA and a 25-foot buffer for the seasonal wetland in the lower Sawmill site.
- **Dune habitat.** Please see Master Response BIO-2, Dune Habitat and Species in Chapter 2. Revisions to Mitigation Measure BIO-A1-1 will require landscape, drainage, pesticide, fertilizer, and irrigation controls in the area adjacent to the Dune ESHA, including specific. These controls in the immediate adjacent area are considered effective to address indirect effects. A monitoring and remedial action regime has also been added.



With the identified mitigation in the DEIR and PRDEIR, as revised in this document, adequate buffers are provided for special-status species and sensitive communities where necessary to reduce impacts to a less than significant level.

78.06 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2 which discusses indirect effects to dune habitat and listed species and describes revisions to the mitigation measures to address these indirect effects. Regarding indirect effects to other sensitive species and habitats, see response above to Comment 78.05 and below to Comment 78.09. Master Response MR-BIO-5 also discusses indirect effects to Monterey pine forest in detail

78.07 Comment states that the project area contains a number of listed CESA species and the DFG's opinion that the project may result in take of listed plant species, and direct and indirect impact, and that take of state-listed species must be authorized by DFG. Comment also notes that DFG is of the opinion that translocation does not contribute substantially to a mitigation strategy. Comment also notes that the existing LCP buffer of 100 feet should be applied between development and any sensitive species and habitats, including wetlands.

Regarding listed state plant species, the state status of plants found on the project site are identified in Appendix E, Table E-8, and authorization for incidental take is noted as a required approval for the project in Table 2-5 in Chapter 5. Direct and indirect impacts to rare plants are described in Chapter 3.3 and cumulative impacts in Chapter 4.4. Regarding translocation, transplantation is included as part of required mitigation for Yadon's piperia, Pacific Grove clover, and pine rose. As to the value of transplantation, please see Master Response for Biological Resources MR-BIO-6 (Yadon's piperia) and MR-BIO-8 (Pacific Grove clover). Regarding pine rose, transplantation of rose species in general is not an uncommon practice (pine rose is not a state-listed species so the comment may not specifically be referring to this species). While the DFG may have other considerations to support this assertion regarding translocation, that information is not provided in this comment.

Regarding buffers, as discussed in the response to CDFG 78.05 above, special-status species have been analyzed and appropriate buffers designated in the DEIR, PRDEIR, and in this FEIR in response to comments. Please see also Master Response BIO-1 (ESHA), MR-BIO-2 (Dunes) and MR-BIO-3 (Wetlands) in Chapter 2.

78.08 This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.

78.09 Comment suggests that Project redesign, as required for certain sites in Mitigation Measure BIO-D1-1, should be expanded to avoid impact to additional areas of sensitive resources.

DEIR Impacts BIO-D1—BIO-D8 address potential direct and indirect impacts of the Proposed Project on special status plant and wildlife species. Please refer to response to 78.05 regarding buffers. Further redesign beyond the DEIR and PRDEIR mitigation as revised in this document is not considered necessary to reduce impacts to special-status species or sensitive vegetation communities to less than significant.

In essence, the comment asserts that unspecified impacts to unspecified resources (with the exception to Yadon's piperia) should have more mitigation. As the comment does not raise specific issues regarding the CEQA analysis, no further response is necessary.

Regarding Yadon's piperia, the DEIR analysis was substantially revised and recirculated in the PRDEIR and no further response regarding the DEIR analysis is provided.

- 78.10-15 These comments address Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 78.16 Please see Master Response for Biological Resources MR-BIO-8 Pacific Grove Clover.
- 78.17 Comment recommends increasing construction buffer for nesting raptors to 150 feet to comply with Fish and Game Code Section 3503.
- This comment has been incorporated into Mitigation Measure BIO-H1 as identified in Chapter 3.
- 78.18 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.
- 78.19 Please see Master Response for Hydrology and Water Quality HWQ-MR-1 Horse Manure in Chapter 2.
- 78.20 The comment recommends that the two easements on the Sawmill site be retained. Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 78.21 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

## **25 SWRCB - State Water Resources Control Board, Water Rights Division**

25.01-10 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

## Local Agencies

## **99            Calcagno, Louis, County Supervisor,                  2nd District**

- 99.01    This comment addresses regional transportation issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the traffic analysis was expanded to address regional highway issues and recirculated in the PRDEIR in September 2004. Comments related to the revised traffic analysis in the PRDEIR are addressed in Master Response for Public Services MR-TC-3 in Chapter 2.
- 99.02    This comment addresses regional transportation issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the traffic analysis was expanded to address regional highway issues and recirculated in the PRDEIR in September 2004. Comments related to the revised traffic analysis in the PRDEIR are addressed in Master Response for Public Services MR-TC-3 in Chapter 2.

## **84 CAWD - Carmel Area Wastewater District**

- 84.01 This comment is noted. Comment indicates that sewer capacity is not an issue for the District.
- 84.02 This comment is noted. Comment indicates that the 70 gallons per day flow estimate is accurate.
- 84.03 This comment is noted. Comment indicates that information regarding the District's tertiary treatment plant is accurately covered in the DEIR.
- 84.04 Comment is noted. This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 84.05 This comment is noted. Comment notes that there is currently no water quality limit set for nitrogen in recycled water.

## 44 City of Monterey

- 44.01 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 44.02 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 44.03 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 44.04 Comment suggests that mitigation should include an off-site area for the Holman Highway 68 widening project, while the costs would be born by the widening project.

The Proposed Project includes the Phase 1B Improvement to the Highway 1/68/17-Mile Drive interchange. The DEIR identifies tree removal pursuant to Phase 1B and mitigation for associated tree removal. Phase 1B is part of the Highway 68 widening project. As discussed in Master Response TC-1 , Phase 1B represents mitigation in excess of the project's contribution to traffic along the portion of Highway 68 within the widening project area. Thus no additional mitigation is required for the project's contribution to tree loss associated with the full widening project.

The project mitigation for impacts to Monterey pine forest requires dedication of the entire Old Capitol site as well as evaluation and implementation of enhancement of degraded forest on the site. Since this is required as mitigation for the Proposed Project, it cannot be "double-counted" as mitigation for another project.

## 52 City of Pacific Grove

- 52.01 The DEIR presents a comprehensive analysis of 19 intersections outside the Forest including 14 intersections within Pacific Grove, along Highway 68, and along Highway 1. The DEIR evaluated 7 intersections within Pacific Grove. The results of the intersection analysis are provided on DEIR Tables 3.7-5, 3.7-6, 4.4-11 and 4.4-12. As indicated in these tables, all intersections will operate Level of Service C or better. These intersections represent the most likely impacted locations as they are near the access roads to the Del Monte Forest. Traffic beyond these intersections disperses to local businesses in Pacific Grove and arterial streets connecting to downtown Pacific Grove, Monterey, and other areas, and would have lesser impacts than the analyzed intersections.

The DEIR found that the internal road system, like the 7 study intersections in Pacific Grove, would operate at acceptable Level of Service C or better under all study conditions. See DEIR Table 3.7-4 through 3.7-6 and 4.4-10 through 4.4-12 for the findings. These intersections represent the locations in Pacific Grove where the majority of the traffic to/from the Country Club and Pacific Grove gates must pass through.

Traffic was assigned to the road system inside and outside the Forest based on the relationship between the project site and the likely destinations outside the Forest. For example, traffic destined for businesses in Pacific Grove and areas of Monterey would be expected to use the Forest gate system adjacent to Pacific Grove. Traffic destined for Highway 1 would be expected to use the Highway 1 Gate.

DEIR technical appendix figures illustrate how project traffic distributes to the surrounding road system. Traffic at the Pacific Grove Gate is expected to primarily distribute to Sunset Drive and 17 Mile Drive at a rate of one car every 4.5 minutes on each road by direction. Similar traffic intensities are expected from the Country Club Gate to the David Avenue corridor. This level of traffic does not represent a significant level because the intersections taking on the greatest traffic load (17 Mile Drive at Sunset Drive, Congress Avenue at Sunset Drive, and Highway 68 at David Avenue) operate at Level of Service C with project traffic.

- 52.02 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 52.03 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 52.04 All transportation impacts associated with the project development were mitigated to less than significant levels. Additional mitigation measures such as utilizing public transportation are not necessary to address significant project impacts. The DEIR did identify existing traffic conditions that are unacceptable such as Highway 68 at Highway 1 intersection. This existing deficiency was identified in a Project Study Report approved by Caltrans in December 2000. The solution to the existing and future congestion at this location was to widen Highway 68 from Highway 1 to the Community Hospital. As a result of this potential project, the project applicant worked with the design engineers who prepared the Project Study Report to identify a component of the ultimate widening project that would have independent utility and be 100 percent compatible with the ultimate project. The result is known as Phase 1B and is discussed on DEIR pages 3.7-4 and 3.7-



5. This improvement results in improved operations from Level of Service F today to Level of Service D in the future with the project.
- 52.05 The parking analyses completed in the DEIR indicate that this area can be used for special event parking, but Pebble Beach Company has indicated that parking at this site should be limited to equestrian center events. See Mitigation Measure TC-E2 on page 3.7-38.
- 52.06 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 52.07 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 52.08 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 52.09 The development area that would most likely be visible from the City of Pacific Grove is the New Equestrian Center. The New Equestrian Center would be located at the former Sawmill site. The buildings at the New Equestrian Center would be located at the upper Sawmill site, which is slightly higher in elevation and farther from the City of Pacific Grove than the lower Sawmill Site. The lower Sawmill site is proposed to remain relatively undeveloped with the exception of provision for parking. Both the upper and lower Sawmill sites are buffered by trees as is the residential area to the north. Based on a review of aerial photographs and topographic maps, views of the New Equestrian Center from residences would be screened by intervening vegetation and aesthetic impacts of the project would be minor. Preparation of visual simulations is not considered necessary.
- 52.10 Potentially significant impacts of the New Equestrian Center are analyzed in the following chapters of the DEIR: 3.1, Land Use; 3.2, Geology, Seismicity, and Soils; 3.3, Biological Resources; 3.4, Hydrology and Water Quality; 3.5, Public Services and Utilities; 3.6, Aesthetics; 3.7, Transportation and Circulation; 3.8, Air Quality; 3.9, Noise; and 3.10, Cultural Resources.
- The temporary uses include those cited by the commenter such as parking, stables, and equestrian rings to accommodate the periodic and annual equestrian events that are currently held at the existing equestrian center.
- 52.11 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 52.12 As described in Chapter 2, Project Description, of the DEIR, the project already includes the dedication of Area D, which is the area west of Del Monte Park and contains the forest between Del Monte Park and Congress Avenue. The area to the south of Del Monte Park between Del Monte Park and S.F.B. Morse Drive was previously dedicated by the applicant as part of HHNA in the later 1980s.
- As stated in the DEIR (Chapter 2., Project Description), relocation of existing trail segments and construction of new trail segments would increase the DMF's trail system by approximately 3.6 miles, for a total of 32.5 miles. In every case, trail realignment and extensions reunite with the rest of the trail system to maintain generally equivalent trail system quality and continuity. See also Master Response PSU-02: Parks, Recreation, and Open Space.
- 52.13 The Proposed Project is expected to add approximately 292 permanent residents to the Del Monte Forest. Additionally, the Proposed Project would add 160 visitor-serving units. The new residents

and visitors could be expected to use public services in the City of Pacific Grove and in other nearby cities such as Monterey and Carmel by the Sea. The total population increase in the DMF would be less than 1 percent of the combined populations of Pacific Grove, Carmel by the Sea, and Monterey, therefore, the impact of the Proposed Project on public services in these cities is considered less than significant and no mitigation is required.

## **82        LAFCO - Local Agency Formation Commission**

82.01    No comments provided so no responses prepared.

## **10 MBUAPCD - Monterey Bay Unified Air Pollution Control District**

- 10.01 Chapter 3.8, Section C, of the DEIR describes the reasoning for limiting the construction area to 13 acres per day. Mitigation Measure AIR-C1 includes the MBUAPCD-recommended mitigation measures listed in Table 8-2 of the MBUAPCD CEQA Guidelines. Construction emissions of PM10 were modeled using the URBEMIS2001 model, including the effectiveness levels for these mitigation measures. Using the model results, it was determined that the maximum acreage that could be disturbed on a single day, with mitigation, without exceeding the MBUAPCD significance threshold of 82 pounds per day, would be 13 acres. The requested data including the URBEMIS model run printouts were provided to MBUAPCD for their review in spring 2004.
- 10.02 The MBUAPCD has recommended the use of catalytic particulate filters on construction equipment in lieu of performing a health risk assessment of diesel TAC emissions from this equipment. The project sponsor has agreed to this mitigation measure, which would substantially reduce the PM10 emissions in the diesel exhaust. As such, a health risk assessment would not be required. Mitigation Measure AIR-C2 has been revised per this comment, as shown in Chapter 3.
- 10.03 Comment noted that prescribed burns would require a MBUAPCD permit, according to the requirements of Regulation IV, Rule 438 (Open Outdoor Fires). This comment is noted.

## **26 Monterey County Environmental Health Department**

26.01 This comment is noted.

## 18 Monterey County Parks Department

18.01 Comment refers to an evaluation of the historical significance of the existing equestrian center conducted by Kent Seavey.

Mr. Seavey commented on the prior EIR prepared for the project previously proposed by the Pebble Beach Company. In his comments, he submitted his assessment of the historical significance of the existing equestrian center buildings. In his opinion, the existing equestrian center should be considered an historic resource for the purposes of CEQA. Mr. Seavey's assessment has been appended to Comment No. 18 for reader reference.

JRP's 1996 technical report resulted from (and responded to) Kent Seavey's evaluation in 1995. So in that regard, this early "comment" is addressed even though Mr. Seavey's opinion was not specifically referenced in the EIR section.

The CRHR criteria for eligibility are as follows:

*An historical resource must be significant at the local, state, or national level, under one or more of the following four criteria:*

- *It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or*
- *It is associated with the lives of persons important to local, California, or national history; or*
- *It embodies the distinctive characteristics of a type, period, region, or method or construction, or represents the work of a master, or possesses high artistic values; or*
- *It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.*

These criteria are also the criteria contained in the CEQA Guidelines Section 15064.5 (3) A through D for determining if a cultural resource is "historically significant". These criteria were used in the analysis of historic resources in the DEIR.

As described in Chapter 3.10 of the DEIR, the assessment of historical significance of the existing equestrian center was conducted by peer review of the prior JRP Historical Consulting Services reports prepared in 2001 and 1996 for the equestrian center and the Collins Cottage and Studio by Jones & Stokes, a site visit, a review of plans for construction and grading at the various project sites; and the professional judgment of Jones & Stokes.

It is a standard of analysis that under most circumstances, a cultural resource is not considered a "historic resource" unless it is at least 50 years old. For properties that are less than 50-years old, the CRHR guidelines specify that "sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than fifty years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance."

Integrity is the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources

eligible for listing in the California Register must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is proposed for eligibility.

The equestrian center is comprised of a complex of 19 buildings and 7 major features, all related to the primary function of the facility as a stable and equestrian training facility. Based on the evaluations of JRP and the peer review of Jones & Stokes, the area as a whole is not considered eligible for listing in the CRHR because the complex as a whole lacks integrity of design, materials, workmanship and feeling to its period of significance. Most of the buildings within the Proposed Project area were built or moved onto the site in the late 1960s or later; as such these younger buildings are not considered to be associated with historical events or people nor to meet the other CRHR criteria and are thus not considered historical resources for the purposes of the DEIR because they do not meet the criteria for CEQA.

There are three buildings older than 50 years within the area, however: the Collins Cottage, the Collins Studio, and Building No. 9 at the Equestrian Center.

- The Collins (James) Cottage was previously evaluated for eligibility for listing in the California Register of Historic Resources (JRP 2001a). This Craftsman style house was built between 1912 and 1913 as a private residence. Citing a lack of significant historic associations, the previous evaluation recommended that this property is not eligible for the CRHR. Although the original owner, Austin James, was active in the early twentieth century Carmel art scene, he does not appear to have achieved the special significance necessary for CRHR consideration. Additionally, the house is a modest example of the Craftsman style as compared to others in the area and is not distinctive. Although the cottage retains a good degree of integrity of workmanship, design and materials, its setting has been substantially altered by construction of a much larger house and barn nearby. Therefore, for these reasons, the Collins (James) Cottage is not considered a historical resource for the purposes of CEQA because it does not meet the criteria of association with historic events, association with historic persons, possess distinctive characteristics, or have the potential to yield important historical information.
- The Collins Studio was originally a part of the Proposed Project, however it was destroyed by a storm and subsequently demolished through a County-issued demolition permit during the application process.
- Building No. 9 at the Equestrian Center was also previously evaluated for eligibility for listing in the CRHR (JRP 1996). That analysis was part of an evaluation of the entire Equestrian Center complex. This quadrangle-type stable was built in 1924 as the Del Monte Properties Pebble Beach Stables. Citing a lack of significant historic associations and a lack of historic integrity, the previous evaluation recommended that this complex is not eligible for the CRHR. The building and the overall complex do not retain historic integrity to the early period of Pebble Beach establishment (pre-World War II). Therefore, Building No.9 is not considered a historical resource for the purposes of CEQA because it does not meet the criteria of association with historic events, association with historic persons, possess distinctive characteristics, or have the potential to yield important historical information.

Although there may be a disagreement between the commenter's opinion, Mr. Seavey's opinion, and that of JRP and Jones & Stokes architectural historians, the comment has not identified any substantial new information that would warrant any change in the text of the DEIR, nor in the conclusions regarding the existing equestrian center.



## **57 Monterey County Parks Department**

- 57.01 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 57.02 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 57.03 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

## **51 MPWMD - Monterey Peninsula Water Management District**

- 51.01 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 51.02 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 51.03 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 51.04 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

## 103 MPWMD

- 103.01 This comment is noted. Comment clarifies that MPWMD acknowledges and recognizes entitlement to Cal-Am water held by the Pebble Beach Company, and urges all efforts be made to minimize potable water use for project irrigation. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

## 28 MST - Monterey-Salinas Transit

- 28.01 This comment is noted.
- 28.02 This comment is noted.
- 28.03 This comment is noted. The comment stated that lack of transit is an environmental justice issue and the applicant's responsibility. CEQA does not require analysis of environmental justice issues. No substantive issues related to CEQA analysis in the DEIR were raised.
- 28.04 This comment is noted. The comment stated that most of the visitor-oriented areas of Pebble Beach are not served by the MST paratransit service, thereby effectively precluding access to disabled persons without their own vehicles. No substantive issues related to CEQA analysis in the DEIR were raised.
- 28.05 This comment is noted. The comment stated that lack of transit causes congestion and worsened air quality. The DEIR addresses air quality impacts of the project.
- 28.06 MST requests that the implementation of Mitigation Measure TC-F1 occur immediately after the project is approved for development. The requirement for a developer to prepare a trip reduction plan is described in the County Zoning Ordinance (Section 20.64.250), which stipulates that the County will review the Trip Reduction Checklist along with the applicant's site development plans as part of the permitting process. Mitigation Measure TC-F1 is consistent with the County Code.
- 28.07 This comment is noted. The comment stated that the applicant and Monterey County should share in funding of transit in the Pebble Beach area. No substantive issues related to CEQA analysis in the DEIR were raised.
- 28.08 This comment is noted. The comment stated that provision of transit service to the project area would provide access for all persons to jobs and amenities in Pebble Beach. MST also stated that they look forward to assisting in the implementation of transit in Pebble Beach. No substantive issues related to CEQA analysis in the DEIR were raised.

## **74 PBCSD - Pebble Beach Community Service District**

- 74.01 This comment is noted. The 6-inch lines were identified in the project application. Construction plans would need to be approved by the appropriate agencies prior to construction. If an inappropriate line size were called for, the applicant would need to revise his plans. The environmental impacts associated with installing a 6-inch pipe as opposed to an 8-inch pipe are not considered significant for purposes the DEIR.
- 74.02 This comment is noted. Chapter 3.5, Public Services and Utilities, has been clarified as shown in Chapter 3.
- 74.03 Comment updated PBCSD's goal for response times. The updated goal has been added to the revised text for Chapter 3.7, Transportation and Circulation in Chapter 3.
- 74.04 This comment is noted. Comment identifies recommended conditions of approval that will be considered as part of the project staff report.

## 46 TAMC - Transportation Agency of Monterey County

- 46.01 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 46.02 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 46.03 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 46.04 Comment is noted regarding the project's payment of impact fees for cumulative impacts. The DEIR technical appendices indicate that the Proposed Project will contribute about 1 percent to the total freeway traffic flow on Highway 1 north of Highway 68. This level of traffic represents an insignificant change and is not therefore expected to have an impact.

This comment also addresses regional transportation issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the traffic analysis was expanded to address regional highway issues and recirculated in the PRDEIR in September 2004. Comments related to the revised traffic analysis in the PRDEIR are addressed in Master Response for Public Services MR-TC-3 in Chapter 2.

The project application does not include any proposal for new special events. The existing special events at the equestrian center would be relocated to the New Equestrian Center, but this would not increase the number nor change the character of expected special events. Given the number of existing Del Monte Forest and Monterey Peninsula golf courses, the new golf course is not expected to increase the overall frequency of tour events, though competitive events may be held at the new golf course. Thus, the project is not considered to result in any substantial increase in special events nor related traffic. The DEIR does, however, review special event traffic impacts at the S.F.B. Morse Gate/Highway 68 intersection due to relocation of the Equestrian Center within Del Monte Forest (see DEIR pages 3.7-26 to 3.7-29).

- 46.05 Comment noted. The comment stated that TAMC fully supports implementation of Mitigation measure TC-F1. The project applicant would be responsible for implementation of Mitigation Measure TC-F1 and as part of implementation would coordinate with affected jurisdictions and take into consideration all feasible measures to reduce vehicle traffic.

TAMC also requested that the implementation of Mitigation Measure TC-F1 occur immediately after the project is approved for development. The requirement for a developer to prepare a trip reduction plan is described in County Zoning Ordinance (Section 20.64.250), which stipulates that the County will review the Trip Reduction Checklist along with the applicant's site development plans as part of the permitting process. Mitigation Measure TC-F1 is consistent with the County Code.

- 46.06 As indicated above in Response to Comment 46.04, the project application does not include any proposal for new special events. The existing special events at the equestrian center would be relocated to the New Equestrian Center, but this would not increase the number nor change the character of expected special events. The DEIR does, however, review special event traffic

impacts at the S.F.B. Morse Gate/Highway 68 intersection due to relocation of the Equestrian Center within Del Monte Forest (see DEIR pages 3.7-26 to 3.7-29). The applicant would be responsible for implementation of Mitigation Measure TC-F1 and as part of implementation would coordinate with affected jurisdictions and take into consideration all feasible measures to reduce vehicle traffic.

- 46.07 Bicycles are allowed within the Forest during daylight hours and riders are advised to use the designated bicycle route. On weekends and holidays, bicycle entry into the Forest is limited to the Pacific Grove Gate, though bicycles may exit from any gate. On weekdays, bicycles may enter and exit at any of the gates. Bicycles are not permitted on hiking or equestrian trails at any time. Paved, marked bicycle lanes are provided on a continuous route from the Pacific Grove Gate to the Pebble Beach Lodge along 17-Mile Drive, Spanish Bay Road, Spyglass Hill Road, and Stevenson Drive. These marked lanes currently terminate on Stevenson Drive at Ondulado Road. With project development, the bike lanes would continue to the Lodge via Forest Lodge Road.

Although advised to retrace the improved route once they have reached Ondulado Road, bicyclists may elect to continue along Stevenson Drive and 17-Mile Drive to an exit at the Carmel Gate. This last portion of the bicycle route travels along a narrow road with heavy traffic volumes (17-Mile Drive); notification of this condition is provided to bicyclists prior to beginning this route.

Pebble Beach Company evaluated opportunities to continue bicycle improvements to the Carmel Gate. Substantial physical constraints exist to completing the marked bicycle lane. Construction of a Class II bicycle facility on these roadways would require, at a minimum, widening the existing roadways by 8 feet to provide two 4-foot bicycle lanes on both sides of the roadway. Widening of this type would require substantial vegetation removal, utility relocation, right-of-way acquisition, retaining wall construction, as well as the relocation and reconstruction of many residential driveways and gates. The cost to complete this work is substantially more than the \$62,000 identified in the comment.

The engineering firm of Creegan & D'Angelo conducted a field investigation of the possible conversion from a Class III to a Class I or II facility in March 1994. (A copy of Creegan & D'Angelo's report is on file with the Monterey County Planning and Building Department.) The 1994 investigation found that 8 feet of widening along the identified portions of 17 Mile Drive and Carmel Way would require the removal of approximately 150 mature trees, and relocation/reconstruction of roughly 30 residential driveways with substantial grade issues. Many driveways along these roadways rise-up or fall-off quickly from the street, and widening of the main roadway would necessitate the complete regrading and reconstruction of these driveways. Finally, the field investigation identified that widening of the existing roadway cross-sections would necessitate substantial property acquisition and the construction of a number of retaining walls between The Lodge and the Carmel Gate. The section of 17-Mile Drive between Crespi Lane and Del Ciervo Road would be an area where substantial retaining walls would be required.

LUP Policy 108 requires bicycle route safety improvements along 17-Mile Drive from the Pacific Grove Gate to Fan Shell Beach. These improvements have been completed. The policy also requires access between Fan Shell Beach and the Carmel Gate to continue to be available as a bicycle route and not as bicycle lanes. This requirement has also been satisfied. The LUP does not require improved bicycle lanes to Carmel Gate and none would be feasible given the findings from the 1994 engineering report completed by Creegan & D'Angelo.

- 46.08 The project applicant would be responsible for implementation of Mitigation Measure TC-F1 and as part of implementation would coordinate with affected jurisdictions and take into consideration all feasible measures to reduce vehicle traffic.



# Organizations

## 60 CNPS - California Native Plant Society

- 60.01 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 60.02 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.
- 60.03 Comment asserts that DEIR must analyze potential impacts to Hooker's manzanita, sandmat manzanita, and Eastwood's golden-fleece.
- DEIR Appendix E, Biological Resources Setting (pages E-25 to E-26), contains species, distribution, and habitat descriptions for Hooker's manzanita. Impact BIO-D4 (pages 3.3-45—3.3-47) addresses project effects on Hooker's manzanita.
- DEIR Appendix E, Biological Resources Setting, pages E-26—E-27, contains species, distribution, and habitat descriptions for sandmat manzanita. Impact BIO-D4 (page 3.3-48) addresses project effects on sandmat manzanita.
- Table E-8, Special-Status Plants Documented or Identified as Having the Potential to Occur in the Project Area, notes that Eastwood's golden-fleece is found only at SFB Morse Preserve and has not been found within surveys of project development sites. SFB Morse Preserve is an existing preserved open space area. Potential indirect impacts to special status plants in the SFB Morse Preserve as a result of increased equestrian and pedestrian activity due to the New Equestrian Center is analyzed in Impact BIO-A5.
- 60.04 This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 60.05 Comment suggests that Mitigation Measure BIO-D1-1 requiring redesign of the Proposed Golf Course be applied to other rare plant species as well. Comment urges implementation of enhancement actions for plant species that are foraged by resident deer.

DEIR Impact BIO-A1 addresses project impacts related to special-status species found within Signal Hill dune area. DEIR Impacts BIO-D1—BIO-D4 address potential direct and indirect impacts of the Proposed Project on special status plant species. Such analysis includes the potential for increased herbivory and browsing from deer and rabbits. For each potentially significant impact identified, mitigation has been proposed to reduce the impact to a less than significant level. In cases where redesign elements are identified in order to reduce impacts to a less than significant level, such mitigation has been included. Examples include Mitigation Measures A1-1, D1-1, D2, and D4. In some cases (such as Hooker's manzanita), redesign has not been identified as necessary to reduce identified impacts to a less than significant level

Regarding alternatives, the commenter is directed to Master Response MR-ALT-1.

Regarding preservation of existing populations of Yadon's piperia (or other species) subject to predation by deer and other species, the Proposed Project and the additional mitigation includes preservation of extensive populations of rare plant species. Enhancement activities conducted as part of resource management may include deer exclusion, although the scale and location of

application of this measure will need to be determined later through the development of the Piperia Plan and the Site-Specific RMPs. Large-scale exclusion may not be feasible or desirable due to concerns about wildlife impacts.

- 60.06 This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 60.07 Comment deplores omission of Maritime chaparral from list of sensitive habitat (as a separate community from Monterey pine forest), and requests mapping, analysis of impacts, and identification of mitigation measures.

As stated in the DEIR (Chapter 3.3, Biological Resources, Environmental Setting section), central maritime chaparral commonly occurs in the Del Monte Forest within Monterey pine forest, as an understory assemblage. It is common practice to characterize habitat by the dominant vegetation, which is Monterey pine forest within most of the project site forested areas. Area F-3 has an area of Bishop pine/Gowen cypress forest, which is the only forest project area not mapped as Monterey pine forest. Monterey pygmy forest is found within HHNA, but this is not a project site.

In Appendix E, maritime chaparral is described generally as an understory association and maritime chaparral species (such as a variety of manzanita species) are noted as understory elements within individuals project sites. While there are several small areas within HHNA where the tree canopy is open and maritime chaparral species constitute the dominant vegetation over a small area, no such open chaparral areas are known within project development areas.

Thus, the project's effects on maritime chaparral are best characterized within the context of the project's effect on the dominant vegetation community, which is the Monterey pine forest. Additional mapping of the understory occurrence within development sites or the occurrences within existing or proposed would not add substantial new evidence that would alter the conclusions of the DEIR regarding project effects on sensitive vegetation communities.

While not mapped, the applicant-proposed and additionally required preservation areas for Monterey pine forest contain extensive areas wherein maritime chaparral species are found as the understory. Since the overall preservation ratio is in excess of 6:1, it is reasonably to conclude that far greater areas of Monterey pine forest with maritime chaparral understory will be preserved than that removed due to project development.

Where maritime chaparral species, such as Hooker's manzanita or sandmat manzanita are rare as an individual species, the DEIR specifically describes project effects on those species.

No revision to the DEIR is necessary concerning maritime chaparral.

- 60.08 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 60.09 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 60.10 Please see Master Response for Range of Alternatives MR-ALT-1 Monterey Pine Forest in Chapter 2.

- 60.11 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 60.12 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.
- 60.13 Please see Master Response for Biological Resources MR-BIO-1 Environmental Sensitive Habitat Areas (ESHAs) in Chapter 2.
- 60.14 Please see Master Responses for Biological Resources MR-BIO-1 ESHA and MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 60.15 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.
- 60.16 This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 60.17 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.

## **49 CRPB & MC - Concerned Residents of Pebble Beach and Monterey County**

- 49.01 Please see Master Response General Issues MR-GEN-1 EIR Format in Chapter 2.
- 49.02 Please see Master Response General Issues MR-GEN-1 EIR Format in Chapter 2.
- 49.03 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 49.04 Please see Master Response General Issues MR-GEN-3 Mitigation Monitoring in Chapter 2.
- 49.05 Table 3.7-1A of the DEIR provides an estimate of construction traffic based on a preliminary construction schedule. The estimates provided in the table are adequate for analyzing traffic impacts. The sequencing of construction activities can be inferred from the table by the number of trips generated and the number of employees engaged in construction at each site during the three-month periods in the table. It would be highly speculative to develop a more detailed construction schedule at this time. Mitigation Measure TC-G1-4 recommends completion of the Highway 1/ Highway 68/17-Mile Drive improvements early in the overall construction schedule.
- 49.06 The consistency of the proposed Equestrian Center use with provisions of the existing easements is a separate land use issue evaluated in the DEIR. The physical impacts of relocating the Equestrian Center to the Sawmill site are also addressed in the DEIR and were found to be less-than-significant with implementation of mitigation measures. Please also see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.07 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2. The DEIR and the Master Response in Chapter 2 does not propose amendment of the easements, but rather describes the environmental effects of potential amendment of easements and the impact of the New Equestrian Center and notes that amendment of the easements would need to occur in order for the project to be developed as proposed.
- 49.08 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.09 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2. Regarding County findings, the language of potential findings by the Board of Supervisors will be prepared at the time of the Board's consideration of the project. Regarding Coastal Commission findings, this is not the purview of the County, but of the CCC.
- 49.10 Please see Master Response for Land Use MR-LU-3 Policy Consistency in Chapter 2.
- 49.11 No information or evidence is presented to substantiate the comment. Potentially significant impacts of the New Equestrian Center are analyzed in the following chapters of the DEIR: 3.1, Land Use; 3.2, Geology, Seismicity, and Soils; 3.3, Biological Resources; 3.4, Hydrology and Water Quality; 3.5, Public Services and Utilities; 3.6, Aesthetics; 3.7, Transportation and Circulation; 3.8, Air Quality; 3.9, Noise; and 3.10, Cultural Resources. The analyses found that impacts can be reduced to a less-than-significant level with implementation of the identified mitigation measures. See also Master Response A-01: Range of Alternatives.
- 49.12 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.

- 49.13 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.14 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.15 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.16 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.17 The operation of the New Equestrian Center is assumed to be essentially identical to the operation of the existing Equestrian Center. No changes have been proposed as part of the Proposed Project other than the relocation. Impacts of relocating and operating the Equestrian Center to the Sawmill Site are discussed in each of the resource area chapters in the DEIR. With regard to camping, users of the New Equestrian Center would be subject to all applicable ordinances. The proposed Equestrian Center facilities and operations are described in the DEIR Project Description on page 2.0-6 and 2.0-7. Traffic impacts related to special events at the Equestrian Center are discussed in the DEIR on pages 3.7-27 through 29.
- 49.18 Comment supports some form of limitation on the number of visitor-serving units that could be built within the Del Monte Forest and noted the 2000 Agreement between the applicant and the DMFPO that talks about a limit of 210 visitor-serving units. This comment is not related to the Proposed Project but rather future potential development. As mitigation is identified in the DEIR and PRDEIR for direct, indirect, and cumulative contributions, such a limit is not required to address the impacts of this project, which is the focus of this CEQA process. Comment is noted.
- 49.19 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 49.20 Please see Master Response for Hydrology and Water Quality HWQ-MR-1 Horse Manure in Chapter 2.
- 49.21 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 49.22 Please see Master Response for Public Services & Utilities MR-PSU-1 Police Services in Chapter 2.
- 49.23 DEIR Impact PSU-C1 (Chapter 3.5, Public Services and Utilities) addresses wildland fire hazards within the DMF. The project applicant's draft Ecological Management Plan includes provisions for prescribed burns and/or mechanical removal of vegetation within the open space areas. The risk of wildland fires for residential and other structures adjacent to open space areas would be reduced to less than significant with implementation of Mitigation Measures PSU-C1-1 and PSU-C1-2. Mitigation Measure PSU-C1-1 requires implementation of fire safety precautions when performing maintenance on natural open space areas, while PSU-C1-2 requires implementation of vegetation management plans and maintenance in high risk fire areas. Coordination with PBCSD Fire Department to develop and implement fire prevention and management plans for those sites adjacent to open space (such as PQR residential subdivision) will reduce potential wildland fire hazards.

- 49.24 The DEIR provides a discussion of construction noise impacts. Noise from construction trucks is listed in Table 3.9-64 and the worst-case analysis includes noise from a truck. Table 3.9-6 indicates that trucks can produce at sound levels of 88 dBA at 50 feet. The EIR acknowledges that the noise ordinance standard of 85 dBA may be exceeded where construction activities are located within about 125 feet of receivers. Eight mitigation measures have been identified to address construction noise. Mitigation Measure Noise-B1-8 specifically will ensure that construction noise will not exceed the County's noise ordinance standard for construction noise. Mitigation Measures Noise-B1-8 has been modified to include "use of alternative trucks routes" as an additional means of complying with the noise ordinance standard. Such mitigation would apply to construction trucks and construction noise along Congress Road.
- 49.25 A traffic analysis was prepared for the Proposed Project and the results are summarized in the DEIR. The effects of the additional visitor-serving units at the Inn at Spanish Bay were considered in the traffic impact analysis. All impacts have been reduced to less than significant through appropriate mitigation measures. Site access is addressed in the DEIR on pages 3.7-33 and 34.
- 49.26 The realignment of Stevenson Drive was addressed in the PRDEIR as mitigation for impacts to Yadon's piperia. Appendix F of the PRDEIR contains a figure showing the revised realignment of Stevenson Drive.
- 49.27 Please see Master Response for Transportation and Circulation MR-TC-2 Construction Traffic in Chapter 2.
- 49.28 This comment addresses issues regarding Bristol Curve. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the EIR analysis was revised regarding Bristol Curve issues and recirculated in the PRDEIR in September 2004. Comments related to the revised analysis in the PRDEIR are addressed in Master Response for Public Services MR-BIO-7 in Chapter 2.
- 49.29 The potential odor impacts from the New Equestrian Center were discussed in Chapter 3.8, Section E. Significant odor impacts would be unlikely, as the closest residential receptor is 2000 feet away. Additionally, the applicant would implement a waste management plan that requires daily management of liquid and solid wastes, and disposal of these wastes off site at least twice weekly. If odors associated with the New Equestrian Center were to become an issue, the applicant would be required to eliminate any offensive odors in order to comply with the MBUAPCD's nuisance rule (Rule 402).
- 49.30 Activities at the New Equestrian Center, including special events, would have the potential to generate dust. Dust control measures at the New Equestrian Center are included as part of the Proposed Project. Appendix G discusses Potable and Reclaimed Water Demand Estimates for the Proposed Project, which includes dust control at the New Equestrian Center (Table G.2-4C). With these dust control measures in place, temporary grass for special events would not be required to minimize dust.
- 49.31 Activities at the New Equestrian Center, including special events, would have the potential to generate dust. Dust control measures at the New Equestrian Center are included as part of the Proposed Project. Appendix G discusses Potable and Reclaimed Water Demand Estimates for the Proposed Project, which includes dust control at the New Equestrian Center (Table G.2-4C).
- 49.32 Activities at the New Equestrian Center, including special events, would have the potential to generate dust. Dust control measures at the New Equestrian Center are included as part of the

Proposed Project. Appendix G discusses Potable and Reclaimed Water Demand Estimates for the Proposed Project, which includes dust control at the New Equestrian Center (Table G.2-4C).

- 49.33 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.34 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.35 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.36 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.37 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.38 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 49.39 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2. Measure A makes no changes in the easements related to the Sawmill; they are still in force today. The Master Response discusses consistency with the easements.



## **23 DMF LUAC - Del Monte Forest Land Use Advisory Committee**

- 23.01 Please see Master Response General Issues MR-GEN-1 EIR Format in Chapter 2.
- 23.02 Please see Master Response General Issues MR-GEN-1 EIR Format in Chapter 2.
- 23.03 The applicant's intentions, beyond the Proposed Project, are not a concern under CEQA. The cumulative analysis in the DEIR takes into account the potential build out of remaining vacant lots in the Del Monte Forest, after construction of the Proposed Project, at the maximum allowed under the LCP and current zoning.
- 23.04 Measure A is not part of the proposed project or a subject of analysis in the EIR. Please see also Master Response for Land Use MR-LU-2 Measure A in Chapter 2.
- 23.05 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 23.06 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 23.07 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 23.08 The Proposed Project does not propose restricting commercial use of SFB Morse Gate nor does the DEIR recommend this as a mitigation measure.
- 23.09 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 23.10 The project encompassing the Proposed Golf Course and Lodge area will increase traffic in the area. Traffic reductions will occur as the equestrian center is relocated but these reductions will not off set increases associated with proposed development in the area. With project completion the area roads will operate at Level of Service C or better. This condition is considered acceptable by County criteria and represents moderate traffic levels with average vehicle speeds near motorist desired speed.
- 23.11 The New Golf Course design requires closing Stevenson Drive between Bristol Curve and Forest Lake Road. In order to maximize preservation of Yadon's piperia in this area, Mitigation Measure Bio D1-2 in the PRDEIR recommends a realignment of Stevenson Drive that is slightly different from the alignment originally proposed by the applicant. Appendix F of the PRDEIR contains a graphic depiction of the recommended alignment.
- 23.12 The Best Management Practices (BMP) Plan and DEIR mitigation measures are anticipated to adequately mitigate potential water quality impacts.

## 37 DMFPO - Del Monte Forest Property Owners

- 37.01 This comment is noted
- 37.02 Comment noted. Area MNOUV was identified by the prior consultant as the environmentally superior alternative for location of the Proposed Golf Course.
- 37.03 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 37.04 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 37.05 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 37.06 Comment requests that the text in Chapter 1 identify that Refined Alternative 2 was identified as the environmentally superior alternative in the prior EIR.

The prior EIR was never certified and thus does not represent a final conclusion or determination of Monterey County regarding the analysis contained therein. The comment is correct that Refined Alternative 2 was identified as the environmentally superior alternative in the Draft EIR and in the non-certified Final EIR. However, this identification was in relation to the project that was proposed at that time and the alternatives identified in that prior document.

Those prior identifications are irrelevant to the current CEQA process.

The DEIR identifies alternatives to the current Proposed Project and identifies the environmentally superior alternative among the alternatives evaluated. Refined Alternative 2 was considered in the alternatives analysis in Chapter 5 (see p. 5.0-31), but rejected from further review because it would result in greater environmental impacts than the proposed project. Similarly, Chapter 5 also notes that a golf course in Area PQR would result in greater biological impacts overall than a golf course in Area MNOUV (see p. 5.0-31 Lines 31-35 and p. 5.0-35 Lines 21 - 36)

The addition of the requested text is not necessary for full disclosure and is not implemented as it is more likely to confuse the reader in regards to the current Proposed Project. The focus of this DEIR is on the current project and its alternatives, not previous alternatives to the prior project.

No revision to the DEIR is warranted.

- 37.07 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 37.08 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 37.09 Comment requested that the DEIR should note that additional golf capacity would be beneficial for both residents and visitors, as evidenced by long booking lead times at other golf courses within the Monterey region.

Comment is noted. However, the purpose of Chapter 3.1 is to analyze the land use compatibility and consistency of the project with land use plans and policies, not evaluate the merits of the project, which is outside of the CEQA review.

- 37.10 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 37.11 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 37.12 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 37.13 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 37.14 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 37.15 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area, “Feasibility of Weed Free Feed” subsection in Chapter 2.
- 37.16 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 37.17 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 37.18 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 37.19 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 37.20 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 37.21 This comment addresses issues regarding Bristol Curve. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the EIR analysis was revised regarding Bristol Curve issues and recirculated in the PRDEIR in September 2004. Comments related to the revised analysis in the PRDEIR are addressed in Master Response for Public Services MR-BIO-7 in Chapter 2.
- 37.22 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.
- 37.23 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.
- 37.24 Comment suggests that mitigation for rare wildlife species (BIO-D8-2 and BIO-D8-3) should be contingent upon presence determined through preconstruction surveys, not habitat potential alone.

Surveys for rare wildlife species have been done within project areas. However, it is not considered feasible without extensive repeat surveys to absolutely conclude that a potential wildlife species is actually absent from an area of suitable habitat. For species that are difficult to detect, this difficulty is compounded in that where suitable habitat is present, it is exceedingly difficult to conclude that the species is not present with a high degree of confidence. Thus, it is

common practice to presume presence within suitable habitat for special status wildlife species where biological studies have indicated a moderate to high potential that the species could occur.

A further concern is that wildlife species are mobile and thus, though a rare wildlife species may not be found in a survey of a project site, it may later colonize an area at some point in the future.

In the Del Monte Forest and Monterey Peninsula context, resort and suburban development have already fragmented and removed substantial areas of habitat for rare wildlife species, making the remaining intact areas of habitat that much more valuable for these species. For the DEIR mitigation, a precautionary approach was followed for a number of wildlife species to ensure that should these species actually be present and/or colonize project sites between the present and construction, that appropriate mitigation measures are adopted as conditions of approval.

- 37.25 Please see Master Response for Hydrology and Water Quality HWQ-MR-1 Horse Manure in Chapter 2.
- 37.26 The DEIR addresses gas, electricity, and phone services in the General Utilities section of the Environmental Setting discussion (Chapter 3.5, Public Services and Utilities, page 3.5-24, line 7). Additional text has been added as shown in Chapter 3 to require consultation with PG&E and SBC to reduce the potential for power and phone disruptions.
- 37.27 This comment is noted. Undergrounding of utilities will be required as a condition of project approval.
- 37.28 This comment is noted.
- 37.29 The portion of Area K proposed for residential development is located along Stevenson Road, which is not a designated scenic corridor. Residential land uses exist on or near Stevenson Road both north and south of the proposed development site. While development of a portion of Area K would change the aesthetic character of the site, residential uses are common in this part of the DMF, and therefore, development of this site would be consistent with other land uses in the area. There are no plans to relocate the existing trail in Area K.
- 37.30 Please see Master Response for Transportation and Circulation MR-TC-2 Construction Traffic in Chapter 2.
- 37.31 The comment stated that the DMFPO supports the proposed improvements to S.F.B. Morse Drive at the entrance to the New Equestrian Center and requested these improvements be included in the text of the DEIR. DEIR page 3.7-22 line 22 identifies the turn lane on S.F.B. Morse Drive as an element of the Proposed Project.
- 37.32 Comment noted. The comment suggested timing improvements to Congress Road to precede construction in other areas so as to minimize noise and dust from construction traffic.
- 37.33 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.
- 37.34 Please see Master Response for Transportation and Circulation MR-TC-2 Construction Traffic in Chapter 2.

## 72 HOPE - Helping Our Peninsula's Environment

- 72.01 Please see Master Response for Biological Resources MR-BIO-1 Environmental Sensitive Habitat Areas (ESHAs) in Chapter 2.
- 72.02 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 72.03 Comment asserts that the DEIR is inadequate because it relies on reports paid for and contracted by the applicant who the commenter believed is “highly discredited.” The commenter’s only support for this claim is a quote from Jake Tapper, a Salon author, to the effect that the Pebble Beach Company is not to be trusted, but which otherwise provides no evidence to support the comment.

The comment is correct that resource reports and plans prepared by consultants hired by and paid for by the applicant were reviewed as one source of information about the project and its resources. Regardless, the applicant’s consultant’s reports were peer reviewed by qualified resource specialists at Jones & Stokes, who was hired by Monterey County, and who is paid by Monterey County for their work on the EIR, not the applicant. This peer review resulted in a number of revisions and additional studies conducted by the applicant’s consultants, Jones & Stokes, and other independent consultants working for the County (Ecosystems West and EcoSynthesis). Jones & Stokes also reviewed literature research, studies conducted by independent scientists, conducted reconnaissance of the project, and consulted its own biology staff that have worked previously throughout the Del Monte Forest on independent work conducted for the California Department of Fish and Game.

The DEIR was prepared by Monterey County and the independent consultants hire by the County to help prepare the EIR, not the applicant or their consultants. Thus, the information in the DEIR represents an independent evaluation by the lead agency of the potential effects of the Proposed Project, as required by CEQA.

- 72.04 The discussion of construction noise impacts does in fact recognize that construction activity has the potential to exceed the county noise ordinance standard of 85 dBA at 50 feet. This is why the construction noise impact (Impact NOISE-B1) is identified as being a significant impact. Mitigation for the significant construction noise impact is provided. Eight mitigation measures have been identified to address construction noise. Mitigation Measure Noise-B1-8 specifically will ensure that construction noise, including noise from chainsaws will not exceed the County’s noise ordinance standard for construction noise. Accordingly, the assertion that there is new information requiring re-circulation of the DEIR is incorrect. No re-circulation of the DEIR is required.

EPA noise criteria are guidelines only and not used by the County. The County uses impact criteria developed and adopted by the County.

Table 3.9-6 in the DEIR lists a variety of construction equipment that could potentially be used for the Proposed Project. A worst-case analysis was conducted on the simultaneous operation of three of the noisiest pieces of equipment: a paver, a scraper, and a truck for a combined sound level of 93 dBA at 50 feet. A chainsaw cutting a tree produces a sound level in the range of 89 to

95 dBA at a distance of 10 feet (Cowan 1994). 95 dBA at 10 feet corresponds to about 81 dBA at 50 feet. Accordingly, operation of a chainsaw is not anticipated to violate the County's noise ordinance standard of 85 dBA at 50 feet and consideration of a chainsaw in this analysis would not have changed the analysis or the impact conclusions. Table 3.9-6 has been modified to include a reference sound level for a chainsaw. The assessment presented is therefore considered to be adequate.

The statements that a chainsaw can produce sound levels of 130 dBA or 115 dBA have no meaning without a reference distance. The sound level of 81 dBA at 50 feet from a published reference source (Cowan 1994) is considered to be a reasonable value. The values of 130 and 115 dBA are likely sound levels at the operator's ear. Table 3.9-6 has been modified to include a reference sound level for a chainsaw. Because the sound level of a chain is less than the construction sound levels evaluated in the DEIR the addition of the chain saw reference sound level is not new significant information. The assessment presented is therefore considered to be adequate and no re-circulation of the DEIR is required.

The use of hand saws, hatchets, and axes may be an option if noise levels actually exceed 85 dBA at 50 feet.

The statements that a wood chipper can produce a sound level of 110 dBA or 96 dBA have no meaning without a reference distance. Cowan 1994 indicates that a wood chipper produces sound level of 93 dBA at 30 feet during tree shredding. This corresponds to sound levels in the range of 89 dBA at a distance of 50 feet. Table 3.9-6 has been modified to include a reference sound level for a wood chipper. Because the sound level of a wood chipper is less than the construction sound levels evaluated in the DEIR (93 dBA at 50 feet) the addition of the chain saw reference sound level is not new significant information. The assessment presented is therefore considered to be adequate and no re-circulation of the DEIR is required.

The criteria for determining significance defined by the County are considered to be reasonable and adequate. A threshold based on "objectionable noise" would be subjective and impractical to apply.

Mitigation Measure NOISE-B1-8 will ensure that construction noise does not exceed the County noise ordinance standard of 85 dBA at 50 feet.

The effects of construction-related activity including noise on wildlife, specifically disturbance to nesting species, are addressed in Chapter 3.3 Biological Resources. No recirculation of the DEIR is required.

The sound levels cited in this comment have no meaning without a reference distance. These cited sound levels are probably at the operators ear which indicates that they have no meaning in the context of an environmental noise assessment. It would also explain why they are much higher than the reference levels at 50 feet. The reference sound levels for construction equipment provided in the EIR are from published technical references and are considered to be reasonable and adequate for this evaluation. The DEIR does not claim that "no sound will exceed 85 dBA for pneumatic equipment." In fact the DEIR states that noise from construction equipment will likely exceed 85 dBA at 50 feet and that the noise impact from construction operations is significant. Eight mitigation measures have been identified to address construction noise. Mitigation Measure Noise-B1-8 specifically will ensure that construction noise, including noise from chainsaws will not exceed the County's noise ordinance standard for construction noise. Accordingly, the assertion in this comment that noise analysis "was written to minimize or hide the worst possible

noise impacts” is not supported by any scientific information and is incorrect. The construction noise analysis presented in the EIR is considered to be reasonable and adequate.

The existing acoustical environment and potential noise impacts associated with the Proposed Project have been discussed and evaluated in accordance with commonly accepted standard practice employed throughout California for CEQA noise impacts. The notion of “silence” cannot be evaluated in any reasonable fashion because true silence only exists in an environment where there is no transmitting medium (i.e. in a vacuum such as outer space.) The county has adopted noise compatibility guidelines and noise ordinance standards which it believes adequately protect the acoustical environment in the County while allowing reasonable development. Any development will result in noise and a change in the noise environment. The purpose of the noise assessment presented in the DEIR is to assess the significance of project related noise relative to County guidelines and standards using commonly accepted analysis practice. The approach to noise impact assessment suggested in this comment is not consistent with standard practice and is not considered reasonable. The noise analysis presented in the DEIR provides a reasonable and adequate assessment of project-related noise impacts. No changes to the DEIR are required.

- 72.05 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 72.06 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

## **73        HOPE - Helping Our Peninsula's Environment**

Due to the length of this comment (~400 pages), the comment and the responses are provided separately in Chapter 7.



## 96            **Helping Our Peninsula's Environment (HOPE)**

- 96.01    Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 96.02    Please see Master Response MR- GEN-2 concerning the CEQA Process in Chapter 2.
- 96.03    Refer to Responses to Comments Medwin-32.04, Concerned Residents of Pebble Beach-49.24, and HOPE-72.04. No changes to the DEIR are required.
- 96.04    The comment alleges that the project would violate county traffic standards by adding vehicle traffic to Highway 68. Several intersections on Highway 68 were identified in the DEIR as operating at LOS F with the project, which is considered a significant impact. Mitigation measures identified in the DEIR (TC-B1-1, TC-B1-2, and TC-B1-3) would reduce these significant impacts to less than significant.
- 96.05    This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 96.06    Please see Master Response MR-GEN-2 concerning the CEQA Process and Master Response MR-LU-1 concerning Measure A.
- 96.07    The comment excerpts portions of the letter to Monterey County from the California Coastal Commission. See responses to Agency Comments.
- 96.08    Please see Master Response MR-BIO-1 regarding environmentally sensitive habitat areas.
- 96.09    The comment excerpts portions of letters to Monterey County from the California Coastal Commission, California Water Resources Control Board, California Department of Fish and Game, and Monterey Peninsula Water Management District. See responses to Agency Comments
- 96.10    This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 96.11    The comment excerpts portions of the letter to Monterey County from the California Coastal Commission. See responses to Agency Comments
- 96.12    This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 96.13    The comment excerpts portions of the letter to Monterey County from the California Coastal Commission. See responses to Agency Comments
- 96.14    The comment excerpts portions of the letter to Monterey County from the California Department of Fish and Game. See responses to Agency Comments.

- 96.15 The comment excerpts portions of the letter to Monterey County from the California Department of Fish and Game. See responses to Agency Comments
- 96.16 The comment excerpts portions of the letter to Monterey County from the California Coastal Commission See responses to Agency Comments

## **29 IRWG - Independent Reclaimed Water Users Group**

- 29.01 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

## **7 LWV - League of Women Voters**

- 7.01 Please see Master Response for Land Use MR-LU-3 Policy Consistency in Chapter 2.
- 7.02 Please see Master Response for General Issues MR-GEN-3 - Mitigation Monitoring in Chapter 2.
- 7.03 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 7.04 Air quality impacts from construction activities were evaluated in Chapter 3.8, Section C, of the DEIR. Fugitive dust emissions (inhalable particulate matter, or PM10) from grading were estimated based on the area undergoing construction and were found to be below the MBUAPCD's significant emissions threshold of 82 pounds per day, resulting in a less-than-significant impact. The criteria pollutant emissions, PM10, nitrogen oxides (NOx), reactive organic gases (ROG), and carbon monoxide (CO), from construction equipment exhaust are accounted for in regional air quality planning by the local air district and the state. The goal of this planning is to develop an emissions budget that would lead the air district toward attainment of ambient standards for pollutants of concern. In addition, the toxic air contaminant (TAC) emissions in diesel exhaust would be reduced substantially by mitigation measures listed in the DEIR, including use of catalytic particulate filters.
- 7.05 CEQA does not require an analysis of economic impacts.
- 7.06 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2. Regarding the regional forest conservation plan, the DEIR identifies that the applicant shall be required to contribute to the development of such a plan because the project makes a considerable contribution to cumulative impacts on Monterey pine forest. The dedication of additional land is the primary means of mitigating the project's contribution and will occur independent of any regional conservation plan. Adoption of the mitigation measure represents an obligation imposed on the applicant and a commitment by the County.
- 7.07 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 7.08 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.

## 47 MPFW - Monterey Pine Forest Watch

- 47.01 This comment is noted
- 47.02 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 47.03 Please see Master Response for Biological Resources MR-BIO-1 Environmental Sensitive Habitat Areas (ESHAs) in Chapter 2.
- 47.04 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 47.05 Comment asserts that discussion of Maritime chaparral as a plant community of special concern should be expanded, including mapping of Maritime chaparral in association with Monterey pine forest.

As stated in the DEIR (Chapter 3.3, Biological Resources, Environmental Setting section), central maritime chaparral commonly occurs in the Del Monte Forest within Monterey pine forest, as an understory assemblage. It is common practice to characterize habitat by the dominant vegetation, which is Monterey pine forest within most of the project site forested areas. Area F-3 has an area of Bishop pine/Gowen cypress forest, which is the only forest project area not mapped as Monterey pine forest. Monterey pygmy forest is found within HHNA, but this is not a project site.

In Appendix E, maritime chaparral is described generally as an understory association and maritime chaparral species (such as a variety of manzanita species) are noted as understory elements within individuals project sites. While there are several small areas within HHNA where the tree canopy is open and maritime chaparral species constitute the dominant vegetation over a small area, no such open chaparral areas are known within project development areas.

Thus, the project's effects on maritime chaparral are best characterized within the context of the project's effect on the dominant vegetation community which is the Monterey pine forest. Additional mapping of the understory occurrence within development sites or the occurrences within existing or proposed would not add substantial new evidence that would alter the conclusions of the DEIR regarding project effects on sensitive vegetation communities.

While not mapped, the applicant-proposed and additionally required preservation areas for Monterey pine forest contain extensive areas wherein maritime chaparral species are found as the understory. Since the overall preservation ratio is in excess of 6:1, it is reasonably to conclude that far greater areas of Monterey pine forest with maritime chaparral understory will be preserved than that removed due to project development.

Where maritime chaparral species, such as Hooker's manzanita or sandmat manzanita are rare as an individual species, the DEIR specifically describes project effect's on those species.

No revision to the DEIR is necessary concerning maritime chaparral.

- 47.06 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 47.07 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.

- 47.08 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2, which discusses indirect “edge” effects to Monterey pine forest in general and Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area, which discusses indirect effects to HHNA from adjacent development. Regarding domestic pets, this is noted as an indirect effect on forested areas on page 3.3-18, line 39 to 41. Some indirect effects of domestic pets on HHNA are likely from an increase of adjacent residents. However, the proposed dedication of a preservation area adjacent to the Corporation Yard employee housing area and required resource management of this preservation area and the entirety of HHNA is expected to protect the overall habitat value such that indirect effects will be less than significant.
- 47.09 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest and Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2. As discussed in those Master Responses, the impacts of foregoing restoration of the Sawmill site and of amending the prior permit conditions are mitigated by the dedication of over 100 acres of additional forested land around HHNA, restoration of portions of HHNA, and resource management of the expanded HHNA area. The DEIR acknowledges that the New Equestrian Center will have effects on HHNA and biological resources and mitigation is proposed in the DEIR (as revised in this document) to address those effects.
- 47.10 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 47.11 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 47.12 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.
- 47.13 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 47.14 Comment asserts that loss of Monterey pines and Coast live oaks would be a significant loss of biological diversity and habitat values and that the loss of unique forest type in Area B and C has been inadequately addressed in the DEIR.

Please see Master Response Master Response BIO-5, Monterey Pine Forest in Chapter 2, which discusses genetic diversity as well as the issue of forest characterization in terms of areas of potential different sensitivity. The issue of forest vegetation associations and geomorphic surfaces is also specifically address in the Master Response. The Master Response also discusses indirect and edge effects.

The DEIR has analyzed the context for tree removal from in light of forest health and habitat values. Impact BIO-B1 discussed project effects on Monterey pine forest on an overall and site by site review. Impact BIO-I1 is a subset of the analysis that discloses overall tree removal but was not intended as a conclusive evaluation of the forest resource as a whole. Regarding habitat for rare wildlife and plant species, this is conducted on a species by species basis. Regarding common wildlife habitat, the Biological Setting in Appendix E discusses the general value of Monterey pine forest and other habitats found within project sites.

The loss of approximately 460 oaks in Areas B and C is clearly disclosed in the DEIR, along with the project’s effects related to tree removal on both rare and common animal species. Habitat will be retained in the preservation area in Area B and the conservation area in Area C including

coastal live oaks that will provide habitat for pallid bats, birds, and other species. Mitigation is identified to replace the removed oaks on a 1:1 basis where feasible within the context of overall forest health. Overall, the DEIR finds that the adopted mitigation would not substantially adversely affect rare species nor reduce populations of common species. While some habitat loss will occur, this does not inherently mean that a significant impact has occurred; rather the DEIR addresses the impacts to vegetation communities such as pine forest as well as the specific impacts to rare species and common wildlife. The comment does not specify why the loss of 460 oaks has been inadequately addressed in the DEIR, other than the issues raised about forest sub-types/genetic diversity, pallid bats, and birds, which are responded to above.

The Biological Resource impact analysis was separated into elements in order to provide a rigorous evaluation of project effects explicitly judged using the disclosed significance criteria. Conclusions about the project effects on Monterey pine forest as an ecosystem should be based on all of the findings within the DEIR related to this resource and not one specific impact discussion. While further detailed elaboration of the project's effects on a specific common species on a specific location could be done, it would not change the overall conclusions of the DEIR and thus no revisions to the DEIR are necessary pursuant to this comment.

- 47.15 Please see Master Response General Issues MR-GEN-3 Mitigation Monitoring and Reporting Plan in Chapter 2.
- 47.16 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.
- 47.17 Please see Master Response General Issues MR-GEN-3 Mitigation Monitoring in Chapter 2.
- 47.18 Comment asserts that Mitigation Measure II-1 (actively planting Monterey pines within preservation areas) is scientifically unproven, and could undermine natural selection. Comments suggest that additional preservation areas be proposed, such as the Aguajito site, instead.

Commenter is referred to Master Response BIO-5, Monterey Pine Forest in Chapter 2 for an overall discussion of project effects.

The suite of applicant-proposed and additionally required mitigation includes avoidance and minimization measures, restoration, enhancement, preservation, resource management, and where and when appropriate, tree planting.

Likely "early" replanting areas include the 15-acre restoration at Proposed Golf Course, non-forested portions of "social" trails or unneeded roads within HHNA, and areas of sparse degraded forest within the Old Capitol Site. These areas offer substantial opportunities where replanting will likely be necessary to recover the formerly removed forest. Due to prior alteration of site conditions such as soil compaction of heavily used roads, forest recovery is likely to be very low or limited absent active intervention. Additional enhancement /restoration opportunities will be identified during the preparation of the Site-Specific Resource Management Plans and during their implementation.

Replanting must be conducted in the context of sustaining forest health and preserving genetic diversity. While the DEIR mitigation requires eventual (within 20 years) replanting on a 1:1 basis for tree loss, it also limits replanting where it cannot be accomplished without compromising the health of native forest areas. Thus, it may be determined in the Site-Specific Resource Management Plans, that replanting is not a recommended resource management tool in certain instances.

The Proposed Project and the additionally required mitigation include dedication of substantial areas of Monterey pine forest (~820 acres). It is probable that tree replanting will not be identified as a recommended resource management tool within larger more intact portions of the preserved areas and thus that natural selection will continue to operate within those stands unless altered by other existing external factors (such as fire suppression).

Overall, the mitigation measures are considered appropriate to address concerns about genetic contamination and further “domestication” of Monterey pine due to replanting. Precluding all replanting, given the controls noted in the DEIR mitigation, does not seem warranted to avoid secondary significant impacts, and would limit the ability to restore overstory in certain degraded or non-forested areas.

On a broad level, the comment appears to advocate that removal of less forest and less replanting would be better for Monterey pine forest health than implementation of the Proposed Project and associated replanting as mitigation. The DEIR does not necessarily disagree with this assertion. In specific, the DEIR identifies several alternatives (see Chapter 5) with less forest removal that are identified as having less adverse effect on Monterey pine forest. However, the DEIR also finds that the Proposed Project’s impact on Monterey pine forest can be mitigated by the measures identified, and that the replanting concerns can be managed.

In addition, the DEIR required (as expanded to 362 acres in this FEIR), the dedication of a portion of the Aguajito site as mitigation for project cumulative impacts on Monterey pine forest.

- 47.19 This comment addresses Yadon’s piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon’s piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 47.20 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2. Comment is noted regarding recommendation to not locate the Equestrian Center at the Sawmill site. Erosion control is described as a required mitigation measure on page 3.3-16 of the DEIR. Permanent trail closures for equestrian use of two critical single-track trails are also required as mitigation. Temporary trail closures will also be required where needed to avert equestrian-related erosion during the wet season. Water quality issues regarding horse waste are discussed in Chapter 3.4 of the DEIR. These identified mitigation measures, along with resource management conducted within third-party oversight, are considered adequate to address the significant effects of additional equestrian and pedestrian use of trails in HHNA.
- 47.21 Please see Master Response for Hydrology and Water Quality HWQ-MR-1 Horse Manure in Chapter 2.
- 47.22 Comment asserts that mitigation measure for Pallid bats is speculative, and cannot ensure relocation of bats from Area C to the preservation areas.

While bat roosting habitat will be lost due to tree removal in some development areas, the DEIR mitigation would require retention of sufficient roosting habitat for pallid bats to avoid significant adverse effects on pallid bat population levels overall. The DEIR does not presume that there will be no net loss of habitat; rather it presumes that the loss of habitat is less than significant in that it is not likely to significant reduce pallid bat population levels. If pallid bats are present within developed areas, individual numbers of bats within that specific area may be reduced. It is expected that bats (pallid or common species) potentially displaced from existing roosts will



move into adjacent trees in nearby areas and/or within the larger preserved areas in the Del Monte Forest such as HHNA and PQR/Pescadero Canyon.

Regarding potential increase in foraging opportunities along irrigated edges, the DEIR notes this as a possibility, not a certainty. The primary reason for concluding that impacts to this species could be mitigated to a less than significant level is the retention and preservation of extensive forested areas within the Del Monte Forest and the requirement to ensure adequate roosting habitat within the preserved areas such that substantial habitat is present for both common bats and the pallid bat (if present).

- 47.23 This comment is noted. Previous responses have addressed specific comments generally summarized in this comment.
- 47.24 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 47.25 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2, which discusses the provided map/GIS analysis of Monterey pine forest. Regarding the 1996 Conservation Strategy, the Master Response also discusses the reasons why an approach other than the geomorphic surfaces was used for the analysis of impacts to Monterey pine forest.

## **102 Monterey Pine Forest Watch (MPFW)**

102.01 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.

## 104 Oak Hills Homeowner's Association Members

104.01 This comment addresses regional transportation issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the traffic analysis was expanded to address regional highway issues and recirculated in the PRDEIR in September 2004. Comments related to the revised traffic analysis in the PRDEIR are addressed in Master Response for Public Services MR-TC-3 in Chapter 2.

104.02 This comment addresses regional transportation issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the traffic analysis was expanded to address regional highway issues and recirculated in the PRDEIR in September 2004. Comments related to the revised traffic analysis in the PRDEIR are addressed in Master Response for Public Services MR-TC-3 in Chapter 2.

104.03 Comment noted. The comment suggested implementing a special event per-car parking fee as mitigation for special events such as the Pro-Am golf tournament, Concourse d'Elegance, and the Salinas Air Show.

The project application does not include any proposal for new special events. The existing special events at the equestrian center would be relocated to the New Equestrian Center, but this would not increase the number nor change the character of expected special events. Given the number of existing Del Monte Forest and Monterey Peninsula golf courses, the new golf course is not expected to increase the overall frequency of tour events, though competitive events may be held at the new golf course. Thus, the project is not considered to result in any substantial increase in special events nor related traffic and mitigation for special event traffic, such as a per-car parking fee, is not warranted.

104.04 This comment addresses regional transportation issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the traffic analysis was expanded to address regional highway issues and recirculated in the PRDEIR in September 2004. Comments related to the revised traffic analysis in the PRDEIR are addressed in Master Response for Public Services MR-TC-3 in Chapter 2.

104.05 This comment addresses regional transportation issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the traffic analysis was expanded to address regional highway issues and recirculated in the PRDEIR in September 2004. Comments related to the revised traffic analysis in the PRDEIR are addressed in Master Response for Public Services MR-TC-3 in Chapter 2.

## **27 OSAC - Open Space Advisory Committee**

- 27.01 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.
- 27.02 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.

## **66 PBEC - Pebble Beach Equestrian Center**

- 66.01 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 66.02 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 66.03 Please see Master Response for Hydrology and Water Quality HWQ-MR-1 Horse Manure in Chapter 2.
- 66.04 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area in Chapter 2.

## **35 PBRTA - Pebble Beach Riding & Trails Association**

- 35.01 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 35.02 Comment requested that the DEIR should note the beneficial impacts of building the Proposed Phase 1B improvements to the Highway 68/Highway 1/17 Mile Dive interchange in the Executive Summary and advocated that language should be added to urge this project element be implemented as soon as possible.
- Comment is noted. However, the purpose of the Executive Summary is not to advocate the merits of any particular project element but rather to summarize the findings of the EIR itself regarding adverse environmental impacts. It should be noted that Mitigation Measure TC-G1-1 requires Phase 1B to be implemented within the first 6-12 months of overall construction. No revisions are required.
- 35.03 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 35.04 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 35.05 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 35.06 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 35.07 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 35.08 This comment is noted. Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 35.09 Please see Master Response for Biological Resources MR-BIO-7 Weed Free Feed in Chapter 2.
- 35.10 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 35.11 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 35.12 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 35.13 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 35.14 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.
- 35.15 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.

- 35.16 Comment suggests that mitigation for rare wildlife species (BIO-D8-2 and BIO-D8-3) should be contingent upon presence determined through preconstruction surveys, not habitat potential alone.

Surveys for rare wildlife species have been done within project areas. However, it is not considered feasible without extensive repeat surveys to absolutely conclude that a potential wildlife species is actually absent from an area of suitable habitat. For species that are difficult to detect, this difficulty is compounded in that where suitable habitat is present, it is exceedingly difficult to conclude that the species is not present with a high degree of confidence. Thus, it is common practice to presume presence within suitable habitat for special status wildlife species where biological studies have indicated a moderate to high potential that the species could occur. A further concern is that wildlife species are mobile and thus, though a rare wildlife species may not be found in a survey of a project site, it may later colonize an area at some point in the future.

In the Del Monte Forest and Monterey Peninsula context, resort and suburban development have already fragmented and removed substantial areas of habitat for rare wildlife species, making the remaining intact areas of habitat that much more valuable for these species.

For the DEIR mitigation, a precautionary approach was followed for a number of wildlife species to ensure that should these species actually be present and/or colonize project sites between the present and construction, that appropriate mitigation measures are adopted as conditions of approval.

- 35.17 Please see Master Response for Hydrology and Water Quality HWQ-MR-1 Horse Manure in Chapter 2.
- 35.18 This comment is noted.
- 35.19 The portion of Area K proposed for residential development is located along Stevenson Road, which is not a designated scenic corridor. Residential land uses exist on or near Stevenson Road both north and south of the proposed development site. While development of a portion of Area K would change the aesthetic character of the site, residential uses are common in this part of the DMF, and therefore, development of this site would be consistent with other land uses in the area. There are no plans to relocate the existing trail in Area K.
- 35.20 This comment is noted. The comment stated support of the proposed improvements to S.F.B. Morse Drive at the entrance to the New Equestrian Center and requested these improvements be included in the text of the DEIR. DEIR page 3.7-22 line 22 identifies the turn lane on S.F.B. Morse Drive as an element of the Proposed Project.
- 35.21 This comment is noted. The comment suggested timing improvements to Congress Road to precede construction activities in other areas so as to minimize noise and dust from construction traffic.
- 35.22 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.

## 62 RVWDW - Rip Van Winkle Dog Walkers

- 62.01 Regarding Monterey pine forest, please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2. Regarding dune habitats, please see Master Response for Biological Resources, MR-BIO-2. Regarding maritime chaparral, please see response to CDFG DEIR comment 78.02.
- 62.02 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 62.03 Please see Master Responses for Land Use MR-LU-02 and for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 62.04 Please see Master Responses for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) and for Hydrology and Water Quality MR-HWQ-1 Horse Manure in Chapter 2.
- 62.05 Please see Master Response for Hydrology and Water Quality HWQ-MR-1 Horse Manure in Chapter 2.
- 62.06 DEIR Impact PSU-B1 (Chapter 3.5, Public Services and Utilities) addresses emergency access routes in developed areas, in coordination with PBCSD Fire Department's Fire Defense Plan and Emergency Access Routes for Designated Open Space Areas and Other Undeveloped Parcels. See also Response to Hunter 31.03.
- 62.07 With the exception of the Highway 1/Highway 68 interchange improvements, the project would not be visible from Highway 68 due to intervening terrain and vegetation. Additionally, Highway 68 is not a designated scenic highway in the vicinity of the Proposed Project and impacts on visual resources along this highway were determined to be less than significant. While views from trails in the DMF would be affected by development of several project elements, these developments are consistent with existing views from other trails in the DMF and, with proposed mitigation; impacts on visual resources were determined to be less than significant. Preparation of additional visual simulations is not considered necessary.
- 62.08 Comment expresses concern about light pollution (specifically Spanish Bay Driving Range, Spanish Bay Employee Housing, and New Equestrian Center as well as others), and requests clarification of potential impacts on additional nighttime lighting on preservation areas.

The Spanish Bay Driving Range would be open from dawn to dusk and thus light pollution is not a concern at that location.

The Spanish Bay Employee Housing area will have residential associated lighting that will have indirect effects on the immediately adjacent forested area. The Proposed Project includes preservation of over 20 acres of forest directly adjacent to the Spanish Bay Employee Housing. While there will be some lighting effects on wildlife in the immediate adjacent forest, this is not considered to be a significant impact because it is not considered likely to substantially change the habitat value of the adjacent area.

With the exception of the covered arena, general hours of operation of the New Equestrian Center would be from dawn to dusk, with occasional evening use for special events, and overnight use during periods of equestrian camp activity. Nighttime lighting would be similarly limited in correspondence to activity. Some limited lighting will also be associated with the employee housing units. The project design includes retention of much of forest fringe around the edge of



the New Equestrian Center within the Sawmill site itself (see Figure E-10). Similar to the discussion above for the Spanish Bay employee housing, there will be some indirect effect on wildlife use of immediately adjacent forest areas, however, this is not considered likely to significantly alter the overall wildlife habitat value of the adjacent HHNA.

For other areas with residential lighting as well as the Proposed Golf Course, the conclusions are similar to those described above.

- 62.09 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 62.10 The commenter suggested that the closing of the Presidio has had adverse impacts on traffic on Highway 68 and that these impacts should be addressed in the DEIR. The closing of the Presidio is not a part of the Proposed Project and therefore was not analyzed in the DEIR. Traffic counts were taken on Highway 68 west of the CHOMP intersection in November 2002 and compared to data collected in May 2000, prior to closing of the Presidio. The comparison showed a decrease in traffic since the closure.
- 62.11 Please see Master Response for Transportation and Circulation MR-TC-2 Construction Traffic in Chapter 2.
- 62.12 Mitigation Measure TC-F1 requires the applicant to prepare a trip reduction plan, which would address special events. The requirement for a developer to prepare a trip reduction plan is described in County Zoning Ordinance (Section 20.64.250), which stipulates that the County will review the Trip Reduction Checklist along with the applicant's site development plans as part of the permitting process.
- 62.13 An emergency evacuation plan for the Monterey Peninsula is beyond the scope of the Proposed Project. While a legitimate concern, it is not applicable to the analysis of impacts in the DEIR for the Proposed Project.
- 62.14 Very few construction vehicles if any are expected to travel through the residential areas of Pacific Grove to get to the construction site. As stated in the Project Description in the DEIR, construction truck access would be limited to the State Route 1 Gate, the Haul Road Gate, and the SFB Morse Gate (Figure 3.7-4 in the DEIR). Thus air quality monitoring in Pacific Grove would be unwarranted. In addition, mitigation measures listed in the DEIR would substantially reduce emissions from construction haul trucks. Emissions from construction equipment have been accounted for in regional air quality planning and would not interfere with attainment of air quality standards.
- 62.15 Comment asks what the mechanism for the public to address traffic, noise, air, water pollution problems and get problems solved during construction would be. Concerned local residents and the public who encounter problems during construction can address their concerns to the Pebble Beach Company, their contractors doing the construction itself, and/or Monterey County Planning & Building Inspection Department.
- 62.16 This comment is noted.

## **83 SFHA - Skyline Forest Homeowners Association**

- 83.01 Comment noted. The commenter correctly stated that Skyline Forest Drive is classified as a local collector, not a minor arterial.
- 83.02 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 83.03 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 83.04 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 83.05 Bus stop location is determined by, and the responsibility of, MST. They currently provide bus service to CHOMP via Holman Highway.
- 83.06 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 83.07 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 83.08 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.

## 64 Sierra Club Ventana Chapter

- 64.01 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 64.02 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 64.03 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 64.04 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 64.05 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 64.06 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 64.07 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 64.08 This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 64.09 Comment asserts that Mitigation Measure BIO-I1-1 does not reduce project impact, does not protect forest health, and may result in adverse effects itself. Planting trees is described as not a proxy for natural regeneration and is asserted as potentially undermining natural selection. Comment asserts that adverse effects of the mitigation may include genetic contamination, loss of genetic diversity, and introduction of soil-born pathogens.

Commenter is referred to Master Response BIO-5, Monterey Pine Forest in Chapter 2 for an overall discussion of project effects.

The suite of applicant-proposed and additionally required mitigation includes avoidance and minimization measures, restoration, enhancement, preservation, resource management, and where and when appropriate, tree planting.

Likely "early" replanting areas include the 15-acre restoration at Proposed Golf Course, non-forested portions of "social" trails or unneeded roads within HHNA, and areas of sparse degraded forest within the Old Capitol Site. These areas offer substantial opportunities where replanting will likely be necessary to recover the formerly removed forest. Due to prior alteration of site conditions such as soil compaction of heavily used roads, forest recovery is likely to be very low or limited absent active intervention. Additional enhancement /restoration opportunities will be identified during the preparation of the Site-Specific Resource Management Plans and during their implementation.

Replanting must be conducted in the context of sustaining forest health and preserving genetic diversity. While the DEIR mitigation requires eventual (within 20 year) replanting on a 1:1 basis for tree loss, it also limits replanting where it cannot be accomplished without compromising the health of native forest areas. Thus, it may be determined in the Site-Specific Resource Management Plans, that replanting is not a recommended resource management tool in certain instances.

The Proposed Project and the additionally required mitigation include dedication of substantial areas of Monterey pine forest (~820 acres). It is probable that tree replanting will not be identified as a recommended resource management tool within larger more intact portions of the preserved areas and thus that natural selection will continue to operate within those stands unless altered by other existing external factors (such as fire suppression).

Impact BIO-I1 specifically discusses concerns about genetic contamination and domestication regarding planting of Monterey pines; thus the DEIR properly discloses potential environmental effects of tree replanting. Mitigation Measure I1-1 also includes the following requirements:

- “Planting stock must be derived from healthy, mature local trees, preferably growing more than 500 feet from known non-local plantings. A qualified forester or biologist shall make selection of suitable trees for planting stock.
- Seed sources shall be stands that exhibit characteristics similar to those in the target planting areas.”
- Monterey pine forest planting stock shall include pitch canker-resistant individuals from a diverse genetic background.”

It should be noted that the mitigation does not require that *all* planting stock should be from pitch-canker resistant stock, but rather that it shall *include* stock thought to be pitch-canker resistant. The comment’s concern that selection of seed stock should be representative of pine genetic diversity is noted; the language in the mitigation and the DEIR reflect an understanding of that concern.

Regarding soil-born pathogens being potentially present in nursery pots, where container stock will be used for outplanting of trees, precautions shall be taken to ensure that container soils do not support the pathogens that cause sudden oak death or pine pitch canker. This has been added to Mitigation Measure BIO-I1-1 as described in Chapter 3 of this document.

Overall, the mitigation measures are considered appropriate to address concerns about genetic contamination and further “domestication” of Monterey pine due to replanting. Precluding all replanting, given the controls noted above, does not seem warranted to avoid secondary significant impacts, and would limit the ability to restore overstory in certain degraded or non-forested areas.

On a broad level, the comment appears to advocate that removal of less forest and less replanting would be better for Monterey pine forest health than implementation of the Proposed Project and associated replanting as mitigation. The DEIR does not necessarily disagree with this assertion. In specific, the DEIR identifies several alternatives (see Chapter 5) with less forest removal that are identified as having less adverse effect on Monterey pine forest. However, the DEIR also finds that the Proposed Project’s impact on Monterey pine forest, can be mitigated by the measures identified, and that the replanting concerns can be managed.

## 76 Sierra Club (Frank P. Angel representing)

- 76.01 Please see Master Response for Land Use MR-LU-3 Policy Consistency in Chapter 2.
- 76.02 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 76.03 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 76.04 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 76.05 Please see Master Responses for Land Use MR-LU-1 Measure A and MR-LU-3 Policy Consistency in Chapter 2.
- 76.06 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 76.07 The comment states that the DEIR inadequately describes golf course and driving range pesticide and fertilizer uses and their direct and cumulative impacts on the environment. Development and project activities are illustrated in figures contained within DEIR Chapter 2.0, Project Description. Coastal resources are illustrated in figures contained within DEIR Chapters 3.3, Biological Resources, 3.4, Hydrology and Water Quality, and 3.6, Aesthetics
- DEIR Impacts HWQ-C2 and HWQ-C4 (Chapter 3.4, Hydrology and Water Quality) address the potential water quality impacts of pesticide, herbicide, fertilizer, and recycled water use at the Proposed Golf Course, New Equestrian Center, and Spanish Bay Driving Range. Please see Response to Wyllly, 8.03. The BMP Plan for the Proposed Project identifies a selected list of potential pesticides, herbicides, and fungicides and the typical application areas where they would be used. Additional requests for data from other golf courses do not address the Proposed Project, as analyzed by this DEIR.
- DEIR Impact BIO-C1 (Chapter 3.3, Biological Resources) addresses potential disturbance and/or indirect impacts to wetlands habitat due to the Proposed Golf Course. DEIR Impact BIO-D5 (Chapter 3.3, Biological Resources) addresses degradation of aquatic and upland habitats for California red-legged frogs (CRLF), a federally listed threatened species, due to runoff from the Proposed Golf Course. Each of the above impacts, HWQ-C2, HWQ-C4, BIO-C1, and BIO-D5, were analyzed in the DEIR as both direct and cumulative effects; see also Chapter 4.4, Cumulative Impacts.
- 76.08 Please see Master Response for Biological Resources MR-BIO-1 Environmental Sensitive Habitat Areas (ESHAs) in Chapter 2.
- 76.09 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 76.10 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.
- 76.11 Comment questions whether the buffer surrounding the seasonal pond is 40 feet or 25 feet. Mitigation Measure BIO-A3 (page 3.3-12, line 45) requires a 40-foot forested native vegetation buffer from the seasonal pond ESHA. Mitigation Measure BIO-D5-1 (page 3.3-52, line 30)

requires 25-foot upland native vegetation buffer around wetland habitat and Drainage I, including the seasonal pond on the Proposed Golf Course. The 25-foot buffer would be within the 40-foot buffer.

- 76.12 Comment questions how 25-foot or 40-foot buffers for protection of CRLF were determined, and if grading and site preparation will await establishment of native plantings on these buffer. Comment also questions what herbicides and pesticides are considered compatible with aquatic systems.

DEIR Impact BIO-D5 (Chapter 3.3, Biological Resources) addresses potential degradation and loss of aquatic and upland habitats, and mortality to CRLF. The 25-foot buffers designated in Mitigation Measure BIO-D5-1 are intended to provide adequate habitat and cover surrounding the wetlands areas that may be used by CRLF for foraging. No vegetation removal (understory or overstory) will be allowed within the buffer; these areas will not be part of the rough.

Golf course turf is not considered a barrier to migration for the CRLF; however, adequate cover must be provided within and directly surrounding feeding and dispersal areas. The 25-foot buffer is intended to provide that cover and dispersal areas separate from the activity area of the golf course are available around every wetland and the seasonal pond. It should be noted that the buffer is a minimum; the current design provides for larger buffers for most wetlands than this minimum (See Figure E-9).

As to “empirical evidence” regarding buffer widths, CRLF are known to be active around the margins and even within water features on numerous golf courses. Of greatest relevance, the DEIR describes that CRLF have been documented adjacent to and on the edge of water features on the Spyglass Hill Golf Course itself. Thus, CRLF can be actively foraging on a golf course or golf course edge itself, though they will require cover for dispersal and to evade predators that will not be present in the golf course. Since the Proposed Golf Course does not provide breeding habitat, due to high salinities in the wetlands and seasonal pond, the concentrations of frogs is not likely to be high at any one time. The 25-foot buffer was selected in the context of the Proposed Golf Course design which already allowed for substantial buffer areas, but in several specified areas did not ensure that wetlands were surrounded by areas providing native vegetation cover for CRLF.

The 40-foot buffer surrounding the ESHA seasonal pond was designed based on estimates of what kind of tree cover would be necessary to provide shade during the hottest parts of the day thus maintaining water temperatures and current evaporation levels.

The herbicides and pesticides compatible with aquatic systems that are listed in Mitigation Measure BIO-D5-3 include glyphosate (taking care not to use glyphosate formulations, such as Roundup, that contain surfactants) and triclopyr, which are preferable to fenamiphos and carbaryl. Using these non-toxic herbicides and pesticides (or their equivalent) will ensure that impacts to CRLF are reduced during operation of the Proposed Golf Course. The BMP Plan (see Appendix F of this document on the CDROM version or the website) identifies various pesticides and herbicides recommended for use on the Proposed Golf Course that are of low toxicity or practically non-toxic to aquatic life.

- 76.13 Comment questions whether the list of rare wildlife species is complete. Special status wildlife species affected by the Proposed Project are described and analyzed in DEIR Impacts BIO-D5 through BIO-D8. Special status wildlife species documented or identified as having the potential to occur in the Project area are listed in Table E-11 on the page following page E-11 in Appendix

E of the DEIR. The impact analysis covers the rare wildlife species potentially affected by the project in the DEIR. The PRDEIR added discussion of rare species potentially affected by Carmel River withdrawals.

- 76.14 Comment questions which common wildlife species are affected by the Proposed Project, and suggests that none are mentioned.

Chapter 3.3, Biological Resources and Appendix E (Biological Resources Setting) both list some of the common wildlife species found within the DMF's different biological communities, as follows:

- Monterey pine forest. Red-tailed hawks, pygmy nuthatch, Townsend's warbler, Dark-eyed junco, Northern flicker, rufous-sided towhee, Anna's hummingbird, Western scrub-jays, acorn woodpeckers, deer, slender and arboreal salamanders.
- Central maritime chaparral. Orange-crowned warbler, rufous-sided towhee, California thrasher, California quail, California mouse, brush rabbit, Heerman's kangaroo rat, brush mouse, narrow-faced kangaroo rat, gray fox, bobcat, spotted skunk, western rattlesnake, and black-tailed deer.
- Central dune scrub. White-crowned Sparrow, Golden-crowned Sparrow, Deer mouse, brush rabbit, Western fence lizard, raptors, foxes, and coyote.
- Wetlands. Sora, red-winged blackbird, marsh wren, Pacific treefrog, western toad, garter snakes, raccoons, Northern rough-winged swallow, and violet-green swallow.
- Riparian habitat. California newt, Pacific treefrog, California slender salamander, arboreal salamander, California red-legged frog, Wilson's warbler, dark-eyed junco, common bushtit, song sparrow, black-tailed deer, and coyote.

DEIR Impact BIO-E1 (Chapter 3.3, Biological Resources) addresses reduction of habitat of common wildlife species and plant communities within the DMF. The effect on common wildlife was analyzed by analyzing the impact on the habitat supporting both common and rare species within the various development areas. As common species, a species-by-species or location-by-location analysis of impacts was not considered necessary provided that assessment of habitat changes was done. Affects on the habitats noted above is provided in the document. Thus, the loss of habitat is a reasonable proxy for assessing common wildlife species that used that habitat and the inclusion of a comprehensive list of common species in the DEIR would not change the conclusions of the DEIR relative to impact to common species.

- 76.15 Comment questions whether wind-protected groves of Monterey pine and Monterey cypress are butterfly roosts, and if the project impacts roosting sites.

Although wind-protected groves of Monterey pine and Monterey cypress could potentially house butterflies, no butterfly roosts have been observed in the DMF. This is noted in Appendix E, Table E-11. As such, no project impacts were identified.

Observed Monarch butterfly roosts in the Monterey peninsula include eucalyptus groves in the City of Pacific Grove.

- 76.16 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated

in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

76.17 This comment is noted.



## 91 Sierra Club - Law Offices of Frank P. Angel

91.01 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.

91.02 The full extent, magnitude, and ramifications of many synthetic organic chemicals after their intended use, particularly hormonally active chemicals, pharmaceuticals, and personal care products (PPCPs), and their presence in the aquatic environment are largely unknown. As compared with direct discharge to surface waters, use of reclaimed water for irrigation has the potential to aid in the removal of some organic chemicals by exposing them to a wide variety of methods of biodegradation, assimilation, or transformation. However, there is insufficient research data to predict the effects and degree of impact, if any, in a particular situation.

DEIR Impacts HWQ-C2 and HWQ-C4 (Chapter 3.4, Hydrology and Water Quality) address the potential water quality impacts of runoff and use of reclaimed wastewater at the Proposed Golf Course, New Equestrian Center, and Spanish Bay Driving Range. Please see Response to Wylly, 8.03. The BMPs Plan, incorporated as part of the Proposed Project, consists of several key components that will be implemented to control PPCPs and other water quality pollutants in runoff to wetlands and local drainages. Runoff from irrigation at the Proposed Golf Course would be conveyed to catch basins, bioswales, and the detention and/or retention basins to intercept and otherwise reduce off-site transport of contaminants.

The project applicant assumes that all reclaimed water supplies distributed by CAWD will meet all water quality standards set by the SWQCB, RWQCB, and other applicable agencies. To date, the RWQCB has not established water quality objectives for the PPCP class of constituents, nor have they been added to the EPA list of priority pollutants.

91.03-10 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

## **43            The Residences at Spanish Bay Association (Berding & Weil, LLP representing)**

- 43.01    This comment is noted. The comment expresses general concerns, but does not address a specific DEIR analysis, and thus, a specific response cannot be provided.
- 43.02    This comment is noted.

## **106 The Residences at Spanish Bay Association (TPG Consulting, representing)**

- 106.01 This general comment is noted. Responses are provided below to specific comments.
- 106.02 The comment suggested that new development at the Inn at Spanish Bay and the development of additional parking at the Inn would result in congestion at the access road to the Inn. The intersection level of service was analyzed in the traffic analysis and no significant impacts were identified. Therefore, the commenter's recommendation to add a separate entrance to the Inn at Spanish Bay area is not warranted.
- 106.03 The Proposed Project does not propose to add any special events in the DMF beyond those already being conducted. The location of equestrian special events would be moved from the existing Equestrian Center to the New Equestrian Center. Roadway improvements are included in the Proposed Project to accommodate increased traffic, including trailers, at the New Equestrian Center.
- 106.04 This comment noted. The comment requested that a construction plan be submitted to the Board of Directors of the RSBA and that a construction management committee be established as conditions of approval of the proposed improvements at the Inn at Spanish Bay. Because the comment does not identify any new impacts and the proposed mitigation would not reduce any impacts identified in the DEIR, the recommendation is not considered a CEQA issue.
- 106.05 The analysis of parking in the DEIR determined that sufficient parking would be provided for the improvements at the Inn at Spanish Bay. The finding of a less-than-significant impact presumed a final design that would direct Inn users to the additional parking at the Spanish Drive Driving Range. The final design would be subject to approval by the County prior to issuance of a building permit, therefore, no additional mitigation, such as the preparation of a parking management plan, was deemed necessary.
- 106.06 The currently proposed design for the Spanish Bay Employee Housing does not include a trail leading to the mid-block crossing at 17-Mile Drive. The revised Figure 2.0-32, Trail Relocations and New Trails, in Chapter 3 of this document shows this design.
- 106.07 This comment noted. The commenter stated that the RSBA supports a four-way stop at the intersection of Congress Road and 17-Mile Drive and identified other features that RSBA would like included in the design of that intersection.
- 106.08 This comment noted. The Board of Directors requested the opportunity to review and comment on design plans for roadway improvements along Congress Road and the Congress Road/17-Mile Drive intersections as well as the traffic management plan for these project components.
- 106.09 This comment is noted.
- 106.10 The County as the CEQA lead agency has the discretion to determine whether to proceed with a Project or Program level EIR. A Project EIR, as is the case here, assesses all impacts associated with all components of the project, i.e., planning, construction, and operation. (CEQA Guidelines Section 15161, defining "Project EIR".) A Program EIR is prepared for a series of actions that can be characterized as one large project, essentially deferring CEQA analysis on certain program actions until such a time that subsequent discretionary actions are taken. (See CEQA Guidelines

Section 15168, defining “Program EIR”.) The project at issue here is not appropriate for a Program EIR since it does not involve a series of actions by the County but rather is the County’s last discretionary approval. Accordingly, the County has required the applicant to provide detailed information regarding all aspects of the “whole of the action” (project) and has determined that the information provided is adequate to assess all environmental effects related to the project per the requirements of CEQA. (See “Project” definition discussion below.) Project details utilized in determining environmental impacts were submitted by the applicant and are available at the County Planning office.

CEQA defines a “project” to mean “the whole of an action, which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, . . .” (CEQA Guidelines section 15378.) The County has included all components of the project in the “project description” and utilized this project description to assess environmental impacts. Therefore, the CEQA project description used to evaluate impacts includes all aspects of the proposed development or “project”. No part of the project has been excluded from the project description and therefore no “piecemealing” has occurred.

- 106.11 See response to 106.10 above.
- 106.12 See response to 106.10 above.
- 106.13 County has complied with all CEQA and County public notice and review requirements and reviewed the FEIR and determined that it complies with the requirements of CEQA.
- 106.14 This general comment is noted. Responses are provided below to specific comments.
- 106.15 This comment is noted. Comment summarizes information in DEIR, but makes no comments regarding the analyses. No response is necessary.
- 106.16 This comment is noted. Comment summarizes information in DEIR, but makes no comments regarding the analyses. No response is necessary.
- 106.17 This comment is noted. Comment summarizes information in DEIR, but makes no comments regarding the analyses. No response is necessary.
- 106.18 This comment is noted. Comment summarizes information in DEIR, but makes no comments regarding the analyses. No response is necessary.
- 106.19 The mid-block pedestrian crossing has been eliminated from the project design. The comment suggested installing an underground crossing of 17-Mile drive at the intersection with Congress Road. An underground crossing would cause more environmental impacts than the proposed plan and therefore was not considered.
- 106.20 The analysis of parking in the DEIR determined that sufficient parking would be provided for the improvements at the Inn at Spanish Bay. The finding of a less-than-significant impact presumed a final design that would direct Inn users to the additional parking at the Spanish Drive Driving Range. The final design would be subject to approval by the County prior to issuance of a building permit, therefore, no additional mitigation, such as the preparation of a parking management plan, was deemed necessary.
- 106.21 The comment suggested that new development at the Inn at Spanish Bay and the development of additional parking at the Inn would result in congestion at the access road to the Inn. The intersection level of service for the intersection of 17-Mile Drive and Congress Road was

analyzed in the DEIR traffic analysis and no significant impacts were identified. Therefore, the recommendation to add a separate entrance to the Inn at Spanish Bay area is not warranted. The request that the County provide the Residences with the opportunity to review draft plans is noted.

- 106.22 Comment noted. The comment requested that the County provide the RSBA with the opportunity to comment on the draft plans for the driveway and road improvements along Congress Road as a condition of project approval.
- 106.23 This comment is noted. Comment notes transportation management for existing special events.
- 106.24 Comment noted. The comment requested that a construction plan be submitted to the Board of Directors of the RSBA and that a construction management committee be established as conditions of approval of the proposed improvements at the Inn at Spanish Bay. Because the comment does not identify any new impacts and the proposed mitigation would not reduce any impacts identified in the DEIR, the recommendation is not considered a CEQA issue.
- 106.25 This comment is noted. Comment summarizes information in DEIR, but makes no comments regarding the analyses. No response is necessary.
- 106.26 This comment is noted. Comment summarizes information in DEIR, but makes no comments regarding the analyses. No response is necessary.
- 106.27 This comment is noted. Comment summarizes information in DEIR, but makes no comments regarding the analyses. No response is necessary.
- 106.28 See Response to Comment 106.10, 106.11, and 106.12 for discussion of Project verses Program EIR.
- 106.29 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 106.30 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 106.31 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.
- 106.32 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 106.33 Please see Master Response General Issues MR-GEN-1 EIR Format in Chapter 2.
- 106.34 Figure 3.1-1 identifies the coastal zone within the Del Monte Forest.
- 106.35 The applicant's consultant's reports were peer reviewed by qualified resource specialists at Jones & Stokes, who was hired by Monterey County to prepare the EIR. This peer review resulted in a number of revisions and additional studies conducted by the applicant's consultants, Jones & Stokes, and other independent consultants working for the County (Ecosystems West and EcoSynthesis). Jones & Stokes also reviewed literature and research studies conducted by independent scientists and conducted reconnaissance of the project.
- 106.36 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.
- 106.37 Please see Master Response General Issues MR-GEN-3 Mitigation Monitoring in Chapter 2.

- 106.38 Comment suggests that Chapter 4.2, Significant Irreversible Environmental Changes should include information about Measure A changes that would reduce residential buildout and increase preservation.

This DEIR analyzes the environmental effects of the Proposed Project, not Measure A. The CEQA requirement regarding significant irreversible environmental changes is to disclose such changes in relation to the Proposed Project, not in relation to potential buildout. The requested context is inappropriate and would confuse the reader as to what changes the project results in and what changes are the result of Measure A.

No revisions to the DEIR are necessary.

- 106.39 Comment requests clarification as to whether project air quality impacts are “significant irreversible environmental changes” or not.

Upon review, air quality impacts related to increased are not considered irreversible, as changes in vehicle and pollution control technology in the future may ultimately reverse the environmental impacts of increased emissions due to project traffic. Text has been changed accordingly. It should be noted that consumption of fossil-fuels remains an irreversible environmental change due to the lack of renewability of these resources.

- 106.40 The citation for “(Brennan pers. comm.)” found on page 3.8-4 of the DEIR refers to a letter from Janet Brennan to Denise Duffy & Associates. The full citation is: “MBUAPCD letter, dated September 13, 2002, from Janet Brennan, Supervising Planner.”

- 106.41 The Initial Study’s Air Quality section 3(e) unsupported conclusion of “No Impact” (Appendix A, pp. 17-20.) has been adequately discussed and analyzed in the Draft EIR (p. 3.8-9.). The County has prepared an EIR subsequent to preparing the Initial Study and therefore, inadequacies in the Initial Study alone, without considering the analysis undertaken in the EIR, cannot provide a basis for concluding the County has not complied with CEQA. In Sundstrom v. Mendocino County the facts involved a County’s attempt to utilize unsupported conclusions in an Initial Study as the only basis for a CEQA Negative Declaration. In the present case the County prepared an Initial Study and determined that the project required the preparation of an EIR as opposed to a Negative Declaration. The EIR has analyzed all impacts of the project in substantially more detail than that conducted for the Initial Study.

- 106.42 Please see Master Response General Issues MR-GEN-1 EIR Format in Chapter 2.

- 106.43 CEQA Guidelines Section 15123 requires that the Executive Summary for an EIR contain the following:

(a) An EIR shall contain a brief summary of the proposed actions and its consequences. The language of the summary should be as clear and simple as reasonably practical.

(b) The summary shall identify:

- (1) Each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect;
- (2) Areas of controversy known to the Lead Agency including issues raised by agencies and the public; and
- (3) Issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.

(c) The summary should normally not exceed 15 pages.

The Executive Summary in this DEIR fulfills each of these requirements, as it includes a project overview, areas of known controversy, analysis of key issues, alternatives considered, and summary of impacts, mitigation measures, and levels of significance. Due to its length, the Regulatory Setting for the Proposed Project is included as Appendix C of the DEIR. The Intended Uses of the EIR section is included in Chapter 2.0, Project Description, of the DEIR.

# Individuals



## 41 Avera, Dr. and Mrs. John B

- 41.01 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 41.02 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 41.03 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 41.04 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 41.05 Comment asserts that the DEIR is inadequate because Mr. Zander is of very limited scientific education and Alan Williams has no biological education. Michael Zander is a biological consultant hired by the Pebble Beach Company. Alan Williams is with the Carmel Development Corporation. Neither prepared the EIR.

The comment is correct that resource reports prepared by Michael Zander were reviewed as one source of information about the project and its resources and that project plans and other material, though not biological resource reports, were submitted by the Carmel Development Corporation. Regardless, all of the applicant's consultant's reports and plan reports were peer reviewed by qualified resource specialists at Jones & Stokes, who was hired by Monterey County, and who is paid by Monterey County. This peer review resulted in a number of revisions and additional studies conducted by the applicant's consultants, Jones & Stokes, and other independent consultants working for the County, specifically Ecosystems West and EcoSynthesis. Jones & Stokes also reviewed literature research studies conducted by independent scientists, conducted reconnaissance of the project, and consulted its own biology staff who have previously worked throughout the Del Monte Forest for the California Department of Fish and Game.

The DEIR was prepared by Monterey County and the independent consultants hire by the County to help prepare the EIR, not the applicant or their consultants. Thus, the information in the DEIR represents an independent evaluation by the lead agency of the potential effects of the Proposed Project, as required by CEQA.

- 41.06 This comment is noted. The comment notes damage to Yadon's piperia. However, the comment does not address a specific DEIR analysis, and thus, a specific response cannot be provided.
- 41.07 This comment regarding concern for Pebble Beach is noted.

## 109 Bhaskar, Elizabeth

- 109.01 The comment questions the need for a New Equestrian Center. The need for or economic feasibility of the New Equestrian Center is not an issue that requires analysis under CEQA. Moving the existing equestrian center is necessary to achieve the applicant's goal of developing a new golf course. Please see Chapter 5, Alternatives for an analysis of alternatives to the proposed project. The environmental impacts of the New Equestrian Center are analyzed in the DEIR and PRDEIR.
- 109.02 The comment questions the need for an additional golf course on the Monterey Peninsula. The need for or economic feasibility of a new golf course is not an issue that requires analysis under CEQA. The environmental impacts of the proposed project are analyzed in the DEIR and PRDEIR.
- 109.03 This comment is noted.

## **59 Burych, Donna**

- 59.01 Comment regarding support of an alternative that retains the equestrian center in its current location is noted. Please also see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 59.02 This comment is noted. The comment states that the proposed driving range at Area C is not necessary. Please also see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 59.03 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 59.04 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.

## **53 Cacace, Stefano**

- 53.01 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 53.02 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Compliance and Sawmill Easements in Chapter 2.
- 53.03 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 53.04 Please see Master Responses for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA).
- 53.05 Please see Master Responses for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) and for Hydrology and Water Quality HWQ-MR-1 Horse Manure in Chapter 2.

## 85 Caneer, D.

- 85.01 Comment requests clarification of Highway 68 widening and impact on tree removals within buffer between Highway 68 and Sunridge Drive.

The Phase 1B project is but part of the overall Highway 68 plan envisioned in the PSR. This DEIR is only responsible for assessing the impacts of Phase 1B, as this is the only Highway 68 element included within the Proposed Project.

The applicant's Forest Management Plan (Staub 2001) requires replanting of Monterey pines at the Phase 1B project site at a ratio of 2:1 (minimum of 104 trees). The replacement trees shall be locally grown, indigenous genetic stock. The landscaping plan shall also include planting of locally grown stock of associated Monterey pine forest understory species, such as coast live oak, manzanita, toyon, and coffeeberry. With replanting, the habitat and aesthetic impacts for the surrounding residential area should be less than significant.

## 86 Caneer, D.

- 86.01 Preparers of the DEIR determined that Impacts PSU-B1 and PSU-C1 (Chapter 3.5, Public Services and Utilities) apply only to the New Equestrian Center, Residential Subdivisions (PQR), and Corporation Yard Employee Housing. Impacts are directly tied to the significance criteria. The criteria for emergency access states that a project would have a significant impact if it would “impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.” While all project areas may require emergency access, only those project components that have the potential to impair or interfere with emergency access are identified as having a significant impact. The same reasoning applies to wildland fires.
- 86.02 Comment noted. Mitigation measures are only required as related to the project analyzed in the EIR.
- 86.03 This comment is noted. The comment states that PBCSD requirements regarding firebreaks and fuel loads are not being met. The comment does not address a specific DEIR analysis, and thus, cannot be further addressed.
- 86.04 The PBCSD Fire Department has prepared and adopted a Fire Defense Plan and Emergency Access Routes for Designated Open Space Areas and Other Undeveloped Parcels. DEIR Mitigation Measure PSU-B1 (Chapter 3.5, Public Services and Utilities) requires the project applicant to coordinate with the PBCSD Fire Department to develop site plans for the New Equestrian Center, Residential Subdivisions (PQR), and Corporation Yard Employee Housing that would accommodate emergency access through these sites, and verify their consistency with the Fire Defense Plan and Emergency Access Routes for Designated Open Space Areas and Other Undeveloped Parcels.

## **110 Cava, Carolyn**

110.01 This comment is noted.

## **50 Coakley, Kaye L.**

50.01 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.



## 11 Cowan, Bruce

- 11.01 This comment is noted. Comment notes areas that benefit from the project.
- 11.02 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 11.03 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.

This comment also addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.

- 11.04 This comment is noted. Comment notes support for the project with applicant commitment to continued habitat management. Please also see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.

## 101 Dilworth, David et al.

101.01 Please see Master Response for Biological Resources MR-BIO-1 Environmentally Sensitive Habitat Areas in Chapter 2.

In addition, subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.

## **2                   Dutton, Alice M.**

- 2.01     Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 2.02     Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 2.03     Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.

## 9 Eddy, Edith

- 9.01 This comment is noted. The comment expresses general concerns regarding development in Del Monte Forest, but does not address a specific DEIR analysis, and thus, a specific response cannot be provided.

## 105 Eddy, Edith

- 105.01 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

## **5 Ford, III, Alexander L.**

- 5.01 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

## **39            Gameiro, Kay**

- 39.01    Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 39.02    Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.

## **54           Gauvreau, Mr. and Mrs. David**

54.01   This comment is noted. The comment notes support for approval of the project.



## **98            Gavreau, David**

98.01    This comment is noted. The comment notes support for the proposed project.

98.02    This comment is noted, but does not address analyses contained in the DEIR.

## **34            Getreu, Sanford & Kelly**

- 34.01    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2. Comments regarding attached map of horse owners and agreement with the Del Monte Forest Property Owners' Association and the Pebble Beach Riding and Trails Association comments is noted.
- 34.02    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 34.03    Golf course designs with Drake and Portola Roads left open would not be feasible. Additionally, impacts related to closure of these roads were mitigated to less-than-significant levels. Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2 for a discussion of trail routing at the Proposed Golf Course.
- 34.04    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 34.05    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 34.06    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space and revised Figure 2.0-32 in Chapter 2.
- 34.07    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 34.08    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 34.09    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 34.10    Comment regarding existing trail maintenance is noted. Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 34.11    Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 34.12    Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 34.13    Comment regarding mitigation is noted. Please see Master Response for Public Services MR-PSU-3 Parks Recreation and Open Space in Chapter 2 regarding construction traffic.
- 34.14    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2
- 34.15    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 34.16    This comment is noted. The comment suggests better equestrian access would be provided if Drake Road or Portola Road were left in place. Golf course designs with Drake and Portola

Roads left open would not be feasible. Additionally, impacts related to closure of these roads were mitigated to less-than-significant levels.

- 34.17 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 34.18 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

## **13 Glenn, Mr. and Mrs. John W.**

- 13.01 This comment regarding Bristol Curve is noted. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the EIR analysis was revised regarding Bristol Curve issues and recirculated in the PRDEIR in September 2004. Comments related to the revised analysis in the PRDEIR are addressed in Master Response for Public Services MR-BIO-7 in Chapter 2.

## 95 Griffin, Annie

- 95.01 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 95.02 DEIR Impacts HWQ-C2 and HWQ-C4 (Chapter 3.4, Hydrology and Water Quality) address the potential water quality impacts of pesticide, herbicide, and fertilizer use at the Proposed Golf Course, New Equestrian Center, and Spanish Bay Driving Range. Please see Response to Wylly, 8.02. Water quality monitoring and reporting procedures will be addressed for implementation during the winter rainfall season to verify that discharges to Carmel Bay do not contain contaminants at levels harmful to aquatic life.
- 95.03 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 95.04 Comment questions the effects of pesticides and fertilizers on CRLF, and if the Proposed Golf Course would increase these chemicals to an unacceptable level for CRLF habitat.

DEIR Impact BIO-D5 (Chapter 3.3, Biological Resources) addresses potential degradation and loss of aquatic and upland habitats, and mortality to CRLF, including increased use of pesticides and fertilizers. The DEIR identifies the following measures to reduce this impact to a less than significant levels relative to pesticides and fertilizer use:

- Best Management Practices - A BMP Plan to protect water quality throughout the Proposed Project (Questa 2003a, Questa 2003b). The BMPs Plan includes measures to manage drainage and runoff, irrigation and turf selection, fertilizers and vegetated buffers, and use and handling of pesticides. The relevant portions of the BMPs Plan are included as Appendix F in this FEIR (on the CDROM version and on the project web site).
- Wetland/Seasonal pond buffers - redesign certain golf course elements to provide minimum 25-foot native vegetation buffers around wetlands and at least 40-foot buffer native vegetation around the seasonal pond. Buffers reduce the amount of pesticides and fertilizers that enter aquatic habitat.
- Wetland Management Plan - wetlands at the proposed Golf Course will be enhanced to re-establish hydrological connections and reduce non-native species, which should enhance habitat for CRLF.
- Operational measures. The applicant will be required to evaluate mechanical and/or hand removal alternatives to use of chemical weed control for non-native vegetation control in wetlands on the Proposed Golf Course site and to use herbicides and pesticides that are compatible with aquatic systems and not toxic to aquatic organisms (e.g., glyphosate [taking care not to use glyphosate formulations, such as Roundup, that contain surfactants] and triclopyr are preferable to fenamiphos and carbaryl).
- New Breeding habitat. The applicant will be required to design new breeding habitat along Seal Rock Creek in accordance with criteria to establish CRLF habitat characteristics.

These measures are considered effective to reduce project impacts to a less than significant level.

It should also be noted that the existing known breeding population of CRLF in the Del Monte Forest is found directly downstream of the Spyglass Hills Golf Course. This population was only recently identified and thus, lacking baseline information from before Spyglass was built, it is not known if past or existing pesticide and fertilizer use has or is having an adverse effect on CRLF in Seal Rock Creek. However, it is evident that golf course management has not precluded successful breeding of CRLF within Seal Rock Creek in the thirty years since Spyglass was built. Thus it is reasonable to conclude that the mitigation identified for the Proposed Project and golf course management based on current pesticide and fertilizer practices should not compromise the foraging and dispersal habitat for CRLF at the Proposed Golf Course location.

- 95.05 This comment is noted. Comment does not address the Proposed Project, as analyzed by this DEIR.
- 95.06 This comment is noted. Subdivision Committee, Planning Commission, and Board of Supervisor's meetings are held in Salinas for projects throughout the County. Due to multiple items on the agendas and the need for multiple County staff necessary to be in attendance at such meetings holding of special meetings for specific projects at night at alternative locations cannot usually be accommodated.
- 95.07 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.

## 61 Hale, Robert

- 61.01 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.
- 61.02 Please see Master Responses for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) and for Hydrology and Water Quality MR-HWQ-1 Manure Management in Chapter 2.
- 61.03 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 61.04 Comment requests a redesign of entrance road and parking area for the New Equestrian Center in order to reduce impact on Monterey pine forest/manzanita forest and off-site wetland/riparian area.

The entrance to the New Equestrian Center will be located along an existing dirt road. The access road to the upper Sawmill site will be located along the existing dirt road, although some removal of forest will be necessary to provide for safe vehicle and trailer passage (see DEIR Volume II Figure E-10).

The off-site wetland/riparian area within HHNA, while less than 100 feet from the parking lot, is uphill from the parking area and thus the parking lot will not drain to the wetland. A forested buffer will be maintained between the parking lot and the wetland area. Relocation of the parking lot is not required in order to provide an adequate buffer for this wetland. Given the relatively limited area within the upper Sawmill, relocation is not likely to substantially reduce forest removal totals overall.

- 61.05 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 61.06 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 61.07 Aesthetic impacts of the facilities at the New Equestrian Center were analyzed in the DEIR. A visual simulation was prepared for the development adjacent to the recreational trail (Figure 3.6-6). The analysis in the DEIR determined that the visual character of the new equestrian facilities would appear compatible with the existing recreational facilities seen in the surrounding Pebble Beach vicinity and would therefore have a less-than-significant impact. Additionally, implementation of mitigation measure AES C-1 would reduce the impact of outdoor lighting to a less-than-significant level.
- 61.08 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 61.09 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2..

Regarding alternatives of relocating lots to other locations, please see the DEIR Chapter 5 and Master Response MR-ALT-1 which identifies where the EIR analyzed such alternatives.

Regarding reduced lot sizes, the DEIR mitigation reduced building envelopes substantially from those initially proposed. Mitigation has been identified to address impacts on biological

resources related to residential subdivisions and thus further reduction of lot size is not required as mitigation.

Regarding the buffer in Lot 1 in Area F-3, there was a typo in Mitigation Measure BIO-A4, which has been corrected in Chapter 3 of this document to note that the mitigation requires provision of a buffer area for Bishop pine/Gowen cypress.

- 61.10 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.
- 61.11 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 61.12 This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 61.13 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 61.14 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 61.15 Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 61.16 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 61.17 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.



## 100 Hartwell, Thomas A. H. Mrs.

100.01 DEIR Impact HWQ-B1 (Chapter 3.4, Hydrology and Water Quality) addresses increased stormwater runoff due to an increase in impervious surfaces and topographic alterations on the project site. As stated in the DEIR, the preliminary drainage report and site plans describe proposed new on-site drainage facilities and improvements, including:

- Controlled discharge outfalls;
- Connections with existing stormwater drainage features;
- Localized discharge structures that flow to open space areas and existing swales; and
- Detention basins.

This impact is considered *less than significant* with implementation of Mitigation Measures HWQ-B1-1 and HWQ-B1-2, which require construction of downstream off-site drainage improvements, as well as submission of final drainage reports on a project-by-project basis.

100.02 Comment noted. Comment does not address the Proposed Project, as analyzed by this DEIR.

100.03 Please see Response to Hartwell, 100.01.

## **65 Haviside, Elizabeth B.**

- 65.01 This comment is noted. The comment states hope that relocation of the current equestrian center will not compromise existing equestrian activities. Please also see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

### **3           Housel, Mary**

- 3.01     Peter Hay Executive Golf Course would not be changed by the Proposed Project.
- 3.02     The most direct access route from the New Equestrian Center to the beach will be via the existing Green Trail between Congress Road and Spanish Bay. Please see the PRDEIR, Chapter 3 for a discussion of biological impacts of increased equestrian use. Also see Master Response MR-PSU-03 for discussion of revisions to mitigation to enhance trail safety along this trail to accommodate this increased equestrian use. This existing trail provides for an off-road route from the new center to the beach.
- 3.03     The proposed entrance to the New Equestrian Center uses existing roads to the maximum extent possible. Moving the entrance closer to the S.F.B. Morse Gate would require construction of new roadways in the DMF, which would have more significant environmental impacts than the proposed design.
- 3.04     Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

## **6 Hunter, Ted. H.**

- 6.01 This comment addresses issues regarding Bristol Curve. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the EIR analysis was revised regarding Bristol Curve issues and recirculated in the PRDEIR in September 2004. Comments related to the revised analysis in the PRDEIR are addressed in Master Response for Public Services MR-BIO-7 in Chapter 2.

## **12 Hunter, Mr. and Mrs. Ted**

- 12.01 This comment regarding Bristol Curve is noted. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the EIR analysis was revised regarding Bristol Curve issues and recirculated in the PRDEIR in September 2004. Comments related to the revised analysis in the PRDEIR are addressed in Master Response MR-BIO-7 in Chapter 2.

## 31 Hunter, Ted H.

- 31.01 Please see Master Response General Issues MR-GEN-1 EIR Format in Chapter 2.
- 31.02 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 31.03 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 31.04 Please see Master Response for Land Use MR-LU-3 Policy Consistency in Chapter 2.
- 31.05 The comment suggests including the project applications in the FEIR and suggests that the list of projects on Page 3 of Chapter 2 of the DEIR is not an adequate description of each project. The list on page 3 is intended only to identify the sites where development would occur with the Proposed Project. The remainder of the Chapter provides a detailed project description that is adequate for the purposes of CEQA impact analysis. Copies of the applications for each project element are available at the Monterey County Planning and Building Inspection Department, Coastal Office, 2620 First Avenue, Marina, California, 93933. Please see Master Response General Issues MR-GEN-1 EIR Format in Chapter 2.
- 31.06 Please see Master Response General Issues MR-GEN-1 EIR Format in Chapter 2.
- 31.07 Please see Master Response General Issues MR-GEN-3 Mitigation Monitoring in Chapter 2.
- 31.08 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.
- 31.09 Table 3.7-1A of the DEIR provides an estimate of construction traffic based on a preliminary construction schedule. The estimates provided in the table are adequate for analyzing traffic impacts. The sequencing of construction activities can be inferred from the table by the number of trips generated and the number of employees engaged in construction at each site during the three-month periods in the table. It would be highly speculative to develop a more detailed construction schedule at this time. Mitigation Measure TC-G1-4 recommends completion of the Highway 1/ Highway 68/17-Mile Drive improvements early in the overall construction schedule. The construction of the New Equestrian Center is clearly a high priority, as it must be completed prior to construction of the Proposed Golf Course at the site of the existing Equestrian Center.
- 31.10 Please see Master Response for Biological Resources MR-BIO-1 Environmentally Sensitive Habitat Areas in Chapter 2.
- 31.11 The applicant's intentions, beyond the Proposed Project, are not a concern under CEQA. The cumulative analysis in the DEIR takes into account the potential build out of remaining vacant lots in the Del Monte Forest, after construction of the Proposed Project, at the maximum allowed under the LCP and current zoning.
- 31.12 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 31.13 This comment addresses issues regarding Bristol Curve. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the EIR analysis was revised regarding Bristol Curve issues and recirculated in the PRDEIR in September 2004. Comments related to the revised analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-7 in Chapter 2.

- 31.14 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 31.15 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 31.16 These easements are provided in the Appendices to this FEIR.
- 31.17 Please see Master Response for Land Use MR-LU-3 Policy Consistency in Chapter 2.
- 31.18 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 31.19 Temporary equestrian events are events that are set up for a short period of time, typically about five days. These events include horse shows and equestrian competitions.
- 31.20 It is speculative to say that more people will truck horses to the ocean area because of the relocation of the Equestrian Center. The number of visitors to the New Equestrian Center and the number of events held there is not expected to change due to the relocation. Therefore, it is assumed that the number of people trucking their horses to the ocean area will not change significantly.
- 31.21 The new Equestrian Center will be 45 acres. Three acres are located outside of the Coastal zone and in another planning area so the number may vary depending on the context in which it is used.
- 31.22 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 31.23 Currently, the equestrian center hosts approximately nine or ten events per year, typically between March and November. The number of participants ranges from 1,600 to 5,000 with approximately an equal number of spectators. The project application does not propose any increase in the frequency or character of equestrian center special events and thus while the effects of moving the location of special events is analyzed in the EIR, the overall level of special events is not analyzed as a project impact.
- 31.24 Competitions range from 2 to 12 days, including 2 to 3 days for arrival. The greatest impact of special events on traffic in the DMF will be at the S.F.B. Morse Gate. Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 31.25 Noise impacts associated with the New Equestrian Center are discussed in the DEIR on page 3.9-9. The County has determined that the associated noise impact would be less than significant. No change to the DEIR is required
- 31.26 A traffic analysis was prepared for the Proposed Project and the results are summarized in the DEIR. The effects of the additional visitor-serving units at the Inn at Spanish Bay were considered in the traffic impact analysis. All impacts have been reduced to less than significant through appropriate mitigation measures.
- 31.27 All transportation impacts associated with the project development were mitigated to less than significant levels. There was no need identified for an additional entrance to the Inn at Spanish Bay.

- 31.28 The comment questions whether Bristol Curve would be used for construction traffic during construction of the Proposed Golf Course. Please see Master Response for Transportation and Circulation MR-TC-2 Construction Traffic in Chapter 2.

Regarding the comment about removal of Bristol Curve, subsequent to the DEIR public review period and based in part on comments received on the DEIR, the EIR analysis was revised regarding Bristol Curve issues and recirculated in the PRDEIR in September 2004. Comments related to the revised analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-7 in Chapter 2.

- 31.29 Please see Master Response for Public Services & Utilities MR-PSU-1 Police Services in Chapter 2.

- 31.30 The PBCSD Fire Department has prepared and adopted a Fire Defense Plan and Emergency Access Routes for Designated Open Space Areas and Other Undeveloped Parcels. DEIR Mitigation Measure PSU-B1 (Chapter 3.5, Public Services and Utilities) requires the project applicant to coordinate with the PBCSD Fire Department to develop site plans for the New Equestrian Center, Residential Subdivisions (PQR), and Corporation Yard Employee Housing that would accommodate emergency access through these sites, and verify their consistency with the Fire Defense Plan and Emergency Access Routes for Designated Open Space Areas and Other Undeveloped Parcels.

- 31.31 DEIR Impact PSU-B1 (Chapter 3.5, Public Services and Utilities) addresses emergency access routes in developed areas, in coordination with PBCSD Fire Department's Fire Defense Plan and Emergency Access Routes for Designated Open Space Areas and Other Undeveloped Parcels. See also Response to Hunter 31.03.



## **48 Hunter, Ted H.**

- 48.01 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 48.02 Please see Master Response MR-GEN-2 n Chapter 2.regarding the CEQA Process.

## **97            Hunter, Ted H.**

- 97.01    Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 97.02    Please see Master Response MR-GEN-2 concerning the CEQA Process.
- 97.03    Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.

## **36 Hurley, Margaret et al.**

- 36.01 Comment noted. The applicant has made a commitment to the DMFPO to construct the new equestrian center before the new golf course. This is a private commitment to which the County is not a party. Impacts related to trail safety during construction are further discussed in Master Response MR-PSU-3 in Chapter 2.
- 36.02 The DEIR recommends closure of two single-track trail segments near the new equestrian center to avert significant impacts related to a substantial increase in equestrian traffic. DEIR does not identify any other permanent changes to allowable use of trails by equestrians. Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 36.03 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2, which discusses weed-free feed.
- 36.04 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2 which discusses temporary trail closures for erosion control..
- 36.05 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2 which discusses the wetlands at the Sawmill area..

## 55 Hurley, Margaret

- 55.01 Comment asserts that the existing equestrian center is a historic site and meets the CRHR criteria for eligibility. Comment advocates that an independent study should be conducted prior to issuance of grading or building permits.

The CRHR criteria for eligibility are as follows:

*An historical resource must be significant at the local, state, or national level, under one or more of the following four criteria:*

- *It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or*
- *It is associated with the lives of persons important to local, California, or national history; or*
- *It embodies the distinctive characteristics of a type, period, region, or method or construction, or represents the work of a master, or possesses high artistic values; or*
- *It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.*

These criteria are also the criteria contained in the CEQA Guidelines Section 15064.5 (3) A through D for determining if a cultural resource is “historically significant”. These criteria were used in the analysis of historic resources in the DEIR.

As described in Chapter 3.10 of the DEIR, the assessment of historical significance of the existing equestrian center was conducted by peer review of the prior JRP Historical Consulting Services reports prepared in 2001 and 1996 for the equestrian center and the Collins Cottage and Studio by Jones & Stokes, a site visit, a review of plans for construction and grading at the various project sites; and the professional judgment of Jones & Stokes.

It is a standard of analysis that under most circumstances, a cultural resource is not considered an “historic resource” unless it is at least 50 years old. For properties that are less than 50-years old, the CRHR guidelines specify that “sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than fifty years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.”

Integrity is the authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance. Historical resources eligible for listing in the California Register must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is proposed for eligibility.

The equestrian center is comprised of a complex of 19 buildings and 7 major features, all related to the primary function of the facility as a stable and equestrian training facility. Based on the evaluations of JRP and the peer review of Jones & Stokes, the area as a whole is not considered eligible for listing in the CRHR because the complex as a whole lacks integrity of design, materials, workmanship and feeling to its period of significance. Most of the buildings within the Proposed Project area were built or moved onto the site in the late 1960s or later; as such these younger buildings are not considered to be associated with historical events or people nor to meet the other CRHR criteria and are thus not considered historical resources for the purposes of the DEIR because they do not meet the criteria for CEQA.

There are three buildings older than 50 years within the area, however: the Collins Cottage, the Collins Studio, and Building No. 9 at the Equestrian Center.

- The Collins (James) Cottage was previously evaluated for eligibility for listing in the California Register of Historic Resources (JRP 2001a). This Craftsman style house was built between 1912 and 1913 as a private residence. Citing a lack of significant historic associations, the previous evaluation recommended that this property is not eligible for the CRHR. Although the original owner, Austin James, was active in the early twentieth century Carmel art scene, he does not appear to have achieved the special significance necessary for CRHR consideration. Additionally, the house is a modest example of the Craftsman style as compared to others in the area and is not distinctive. Although the cottage retains a good degree of integrity of workmanship, design and materials, its setting has been substantially altered by construction of a much larger house and barn nearby. Therefore, for these reasons, the Collins (James) Cottage is not considered a historical resource for the purposes of CEQA because it does not meet the criteria of association with historic events, association with historic persons, possess distinctive characteristics, or have the potential to yield important historical information.
- The Collins Studio was originally a part of the Proposed Project, however it was destroyed by a storm and subsequently demolished through a County-issued demolition permit during the application process.
- Building No. 9 at the Equestrian Center was also previously evaluated for eligibility for listing in the CRHR (JRP 1996). That analysis was part of an evaluation of the entire Equestrian Center complex. This quadrangle-type stable was built in 1924 as the Del Monte Properties Pebble Beach Stables. Citing a lack of significant historic associations and a lack of historic integrity, the previous evaluation recommended that this complex is not eligible for the CRHR. The building and the overall complex do not retain historic integrity to the early period of Pebble Beach establishment (pre-World War II). Therefore, Building No.9 is not considered a historical resource for the purposes of CEQA because it does not meet the criteria of association with historic events, association with historic persons, possess distinctive characteristics, or have the potential to yield important historical information.

Although there may be a disagreement between the commenter's opinion, and that of JRP and Jones & Stokes architectural historians, the comment has not identified any substantial new information that would warrant any change in the text of the DEIR, nor in the conclusions regarding the existing equestrian center. No revisions to the DEIR are warranted.

## **68 James, Dr. and Mrs. Paul G.**

- 68.01 This comment is noted. The comment expresses general concerns regarding development but does not address a specific DEIR analysis.
- 68.02 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

## **111 Killough, Courtney**

111.01 The comment questions the impact of developing the New Equestrian Center on wildlife. Please see Chapter 3.3 Biology of the DEIR, where the biological impacts of the proposed project are analyzed in detail.

# **1 Kmetovic, Anne Reese**

1.01 This comment noted. Comment notes support for the Proposed Project.



## 70 Kunitani, Craig

- 70.01 The total trail mileage for the environmental analysis was provided by the applicant and reviewed by County staff. The total trail mileage in the DMF is difficult to determine because some trails overlap with fire roads and other trails. The Proposed Project would relocate six existing trail segments and construct ten new trail segments resulting in a net increase of 2.4 miles of new trails.
- 70.02 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 70.03 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 70.04 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 70.05 This comment is noted. The comment states support for the re-routing of the existing trail running through Area I-2 to the north.
- 70.06 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 70.07 Please see Master Response for Parks, Recreation and Open Space MR-PSU-3 in Chapter 2.
- 70.08 As stated in the project description, the improvements to Congress Road between Lopez Road and SFB Morse Drive would include repaving and improvements to the drainage system.
- 70.09 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.

## **4 LaMothe, DDS, Daniel E.**

4.01 This comment is noted.

## 15 Lehman, Gifford and Pam

- 15.01 This comment addresses issues regarding Bristol Curve. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the EIR analysis was revised regarding Bristol Curve issues and recirculated in the PRDEIR in September 2004. Comments related to the revised analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-7 in Chapter 2.

## 16 Long, Darryl

- 16.01 This comment addresses issues regarding Bristol Curve. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the EIR analysis was revised regarding Bristol Curve issues and recirculated in the PRDEIR in September 2004. Comments related to the revised analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-7 in Chapter 2.

## **56 Lord-Wolfe, Edith**

- 56.01 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 56.02 Comment regarding trail use is noted. Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 56.03 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 56.04 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

## **45            Mauz, Peggy**

- 45.01    This comment regarding need for an equestrian center in Pebble Beach is noted.
- 45.02    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 45.03    Please see Master Responses for General Issues MR-GEN-1 (regarding format) and for Hydrology and Water Quality HWQ-MR-1 Horse Manure in Chapter 2.
- 45.04    Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 45.05    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

## 38 McCarthy, Carol

- 38.01 Please refer to DEIR page 3.1-14, lines 14 through 17 where it states that Measure A would change the designation of the portion of the site in the coastal zone to OR.
- 38.02 Temporary equestrian events are events that are set up for a short period of time, typically about five days. These events include horse shows and equestrian competitions.
- 38.03 This comment is noted. The description of Biological Communities in Chapter 3.3, Biological Resources, of the DEIR identifies Monterey pygmy forest and Gowen cypress as part of the HHNA, which is adjacent to the New Equestrian Center site. Please also see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 38.04 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 38.05 Under the Proposed Project, the SFB Morse Botanical Reserve and HHNA would remain adjacent to one another. The Sawmill site, which is adjacent to but not in the HHNA, would be developed for a New Equestrian Center. Development of the disturbed Sawmill site would enable preservation of surrounding undisturbed native Monterey pine forests. See also Master Response LU-02: Spanish Bay Permit Compliance and Sawmill Easements.
- 38.06 Please see Response 38.01 above and Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 38.07 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Compliance and Sawmill Easements in Chapter 2.
- 38.08 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 38.09 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 38.10 Please see Master Response for Land Use MR-LU-2 Spanish Bay Permit Compliance and Sawmill Easements in Chapter 2.
- 38.11 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 38.12 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 38.13 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 38.14 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 38.15 Please see Master Response General Issues MR-GEN-3 Mitigation Monitoring in Chapter 2.
- 38.16 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 38.17 Comment requests that EIR substantiate mitigation measure for loss of Pallid bat habitat.

DEIR Mitigation Measure BIO-D8-3 (Chapter 3.3, Biological Resources) requires that site-specific RMPs retain dead trees or snags, wherever feasible, in development areas and in preservation areas. While bat roosting habitat will be lost due to tree removal in some development areas, this mitigation would require retention of sufficient roosting habitat for pallid bats to avoid significant adverse effects on pallid bat population levels overall. Pallid bats potentially displaced from existing roosts are anticipated to move into adjacent trees in HHNA, Pescadero Canyon, and other preservation areas.

- 38.18 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 38.19 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 38.20 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 38.21 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 38.22 Comment questions where in the DEIR criteria is defined for determining that mitigation will reduce significant impacts to less-than-significant impacts. Significance criteria are identified for each resource area at the beginning of the Impacts and Mitigation Measures section of the respective chapter. The discussion of impacts and mitigation measures in these sections describes mitigation measures that would reduce the severity of impacts and the level-of-significance relative to the significance criteria after mitigation.

The second part of this comment concerns the potential wildlife impact of security fencing at the New Equestrian Center and the Spanish Bay Driving Range

With the Proposed Project, the developed part of the upper Sawmill site will not constitute habitat for wildlife. Habitat will still be able to traverse HHNA to the south of the center and across the lower Sawmill site, where no fencing is proposed. Thus, the presence of a security fence in the upper Sawmill site is not considered a significant impact on wildlife movement.

Regarding the Spanish Bay Driving Range, no security fence is proposed. The referenced line on Figure 2.0-14 is a development limit, not a fence.

- 38.23 LUP Policy 14 relates to the removal of indigenous vegetation and land disturbance near ESHA. The ESHA wetland contained within the Spanish Bay Driving Range site is proposed to be enclosed within a conservation area. The boundaries of this applicant-proposed conservation area include all areas within 100 feet of the ESHA. For this reason this policy is not applicable to the driving range site.
- 38.24 Please see Master Response for Hydrology and Water Quality HWQ-MR-1 Horse Manure in Chapter 2.
- 38.25 Parking for New Equestrian Center events was not identified as a significant impact; therefore, it is not included in the impact summary table on page 3.7-2. (See page 3.7-37 of the DEIR regarding special events parking at the Equestrian Center.)
- 38.26 A sample layout for temporary events, including additional temporary parking for automobiles and trailers is provided in Figure 2.0-11. Individual events may dictate variations to this layout. RV camping would be allowed only during special events at the Equestrian Center under specific conditions that are spelled out in Master Response for Land Use MR-LU-3.



- 38.27 The upper sawmill site contains provisions for 126 permanent parking spaces. The parking spaces are identified in Figure 2.0-10 as numbers in parentheses. Due to the reduction of the site plan drawings for inclusion in the DEIR, these numbers are difficult to see. Special event parking would be at the lower sawmill site and includes provision of 100 trailer spaces plus 150 automobile spaces in the layout shown in Figure 2.0-12. This layout would be modified depending on the size and type of special event. Although 300 to 400 visitors per day may be expected at equestrian special events, not all visitors would be at the site at the same time and the proposed number of parking spaces would be adequate.
- 38.28 The parking analyses completed in the DEIR indicate that this area can be used for special event parking, but Pebble Beach Company has indicated that parking at this site should be limited to equestrian center events. Mitigation Measure TC-E2 on page 3.7-38 notes that special event parking could be at the lower Sawmill or other locations.
- 38.29 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 38.30 The comment suggested that the closing of the Presidio has had adverse impacts on traffic on Highway 68 and that these impacts should be addressed in the DEIR. The closing of the Presidio is not a part of the Proposed Project and therefore was not analyzed in the DEIR. Traffic counts were taken on Highway 68 west of the CHOMP intersection in November 2002 and compared to data collected in May 2000, prior to closing of the Presidio. The comparison showed a decrease in traffic since the closure.
- 38.31 Comment is non-specific about alleged inconsistencies and thus no corrections were made.
- 38.32 Measure A would designate the New Equestrian Center site as Open Space Recreation (OR) within the Coastal Zone. Outside the coastal zone, the existing Multi Family Residential (MDR) designation would be retained on a 3-acre portion of the lower site. Employee housing is allowed as a conditional use (requiring a Coastal Development Permit) in the OR designation.
- 38.33 Please see Master Response General Issues MR-GEN-1 EIR Format in Chapter 2.

## 32 Medwin, Herman, Ph.D.

- 32.01 The noise analysis presented in the DEIR was prepared in compliance with common and standard professional practice. The analysis quantifies noise exposures using metrics specified in the Monterey County Noise Element and Noise Ordinance, which are based on sustained noise exposure. The DEIR and PRDEIR establish the criteria for determining impact significance based on County standards based on ambient noise levels. While the comment is correct that intermittent noise can at times be annoying, short-term annoyance is not a significance criteria used for identification of significant impacts in the EIR. The comment later goes on to suggest that “transient” noise greater than 55 dBA or 5 dBA greater than the “local natural sound levels” should not be permitted, without substantiation of why such transient noise levels may represent a significant impact. As a practical matter, residential areas and other areas of existing development, unless isolated and without mechanized activity, are usually subject to transient noise of short-term duration in outdoor areas of 55 dBA and greater due to traffic, dogs barking, and landscape maintenance or other sources within the Del Monte Forest. This does not mean that such short-term noise results in physical harm or substantial disruption of residential or other land uses. While noise levels of a much greater magnitude can result in harm and disrupt land uses, particularly if sustained, this is not true of transient noise in the 55 to 70 dBA range. The criteria used to identify significant impacts in the DEIR is considered appropriately protective of human health and existing land uses.
- 32.02 The County’s Noise Element Standards for residential uses are to be applied at the location of outdoor activity areas. It is customary to assume that outdoor activity areas for single-family residences are individual backyards. The evaluation of noise from construction equipment was conducted for a reference distance of 50 feet because this is what is specified in the County’s noise ordinance (Chapter 10.60, Section 10.60.030 of the County Health and Safety Code).
- The use of a specified distance from the roadway to compare traffic noise exposures with and without a Proposed Project is intended to provide a consistent means for analyzing the potential for significant project-related changes in noise exposure. A reference distance of 50 feet approximates the closest residential setbacks from the roadway within the Del Monte Forest. Relative changes in traffic noise exposure due to a proposed action will be the same at any chosen distance from the roadway.
- 32.03 This comment is noted. Construction traffic impacts and related mitigation measures are discussed in Chapter 3.7 of the DEIR on page 3.7-41.
- 32.04 Table 3.9-6 lists a variety of construction equipment that could potentially be used for the Proposed Project. A worst-case analysis was conducted on the simultaneous operation of three of the noisiest pieces of equipment: a paver, a scraper, and a truck for a combined sound level of 93 dBA at 50 feet. A chainsaw cutting a tree produces a sound level in the range of 89 to 95 dBA at a distance of 10 feet (Cowan 1994). 95 dBA at 10 feet corresponds to about 81 dBA at 50 feet. Accordingly, operation of a chainsaw is not anticipated to violate the County’s noise ordinance standard of 85 dBA at 50 feet and consideration of a chainsaw in this analysis would not have changed the analysis or the impact conclusions. The assessment presented is therefore considered to be adequate. Table 3.9-6 has been modified to include a reference sound level for a chainsaw.
- 32.05 The stated reaction of residents to noise is speculative. Chapter 3.9 of the DEIR addresses noise impacts related to traffic and construction. No changes to the DEIR are required.

- 32.06 Noise control procedures and standards that have been adopted by the City of Pacific Grove do not apply to the Proposed Project because the project is located entirely within the unincorporated county of Monterey, and County standards have been used as indicated in Response 32.01.

A review of City's noise element (City of Pacific Grove General Plan, Health and Safety, Chapter 10, p. 166- 169) and noise ordinance (Chapter 11.96 of the City Code) did not indicate any consistency between the City's requirements and those proposed as "feasible mitigation measures" for this project Comment 32.07 below. As an example, the Pacific Grove General Plan noise element allows transportation noise exposure in outdoor areas of residential and other land uses to be 60 dBA (Ldn/CNEL) and for playgrounds and parks to be 70 dBA, whereas the comment supports a maximum level of 55 dBA and 5 dBA increase. The Pacific Grove General Plan requirements for stationary sources are an hourly Leq of 50 dBA and maximum level of 70 dBA during the day, whereas the comment supports a maximum level of 55 dBA. The City's noise ordinance has no quantitative noise standards except for leaf blowers.

- 32.07 Comment presents the author's opinion regarding proposed mitigation measures. As noted in response to other comments, the noise chapters in the DEIR and PRDEIR adequately identify noise impacts and proposes feasible mitigation measures for identified significant impacts. As such, adoption of alternative mitigation measures is not necessary, unless the comment were to identify an inadequacy in the analysis of impacts or the effectiveness of proposed mitigation.

The remainder of this response addresses technical points raised in this comment.

- The comment apparently misinterprets the findings of the World Health Organization (WHO) Guidelines in regards to annoyance due to noise exposure in outdoor living areas. WHO Guideline Table 1 described that outdoor living area noise exposure should be quantified in terms of the A weighted equivalent energy level ( $L_{eq}$  or  $L_{Aeq}$ ) over a reference period of 16 hours, whereas the comment suggest that the guidelines represent maximum allowable intermittent noise levels, which is not the case.
- The comment apparently misinterprets the findings of the WHO Guidelines in regards to hearing impairment. The guidelines describe that hearing impairment is not expected to occur at an equivalent energy ( $L_{eq}$ ) noise exposure of 75 dBA over an 8-hour period. The comment suggests that hearing impairment may occur with a maximum intermittent noise level exceeding 75 dBA, which is not what the guidelines address, which is sustained noise exposure.
- The comment implies that noise above 55 dBA can be "harmful" to people's health without any specific description of the character of that harm. Annoyance due to noise intrusion and physical damage due to sustained high noise levels are quite different phenomena. As noted above, WHO Guidelines identify that sustained levels of noise exposure > 75dBA over an 8-hour period can result in impairment that would represent harm, but not merely noise above 55 dBA as the comment suggests.
- Regarding speech intelligibility, the WHO guidelines address only interior noise exposure.
- Maximum intermittent sound level caused by natural and man-made sources can reach and exceed 55 dBA due to traffic, birds, barking dogs, wind in vegetation, surf, landscape maintenance (such as mowing), local and distant traffic are a few examples of such sources. As evidence, refer to Table 3.9-9 on page 3.9-18 in the DEIR. Prohibition of intermittent noise levels above 55 dBA is thus not practical.

- Collection of a “complete” noise inventory using physical measurements is not practical, or necessary to present a reasonably baseline for analysis of effects. As described in Chapter 3.9 representative noise baseline measurements were collected in the Del Monte Forest.
- Computer models are a commonly used method of analysis when the consequences of a proposed project must be evaluated in a consistent and repeatable manner.
- A 5-dB increase in sustained noise exposure is a commonly used threshold of significance and was used in the noise analysis. The comment however, asserts that any 5-dBA increase in intermittent noise levels should be addressed by mitigation, without justification as to what harm an intermittent 5-dB increase would cause. Further, a single heavy truck can increase intermittent noise levels for a short period of time by greater than 5-dB; prohibition of all such intermittent increases in considered infeasible.
- There are no known sources of inaudible low frequency infrasound or high frequency ultrasound associated with this project.

No changes to the DEIR are warranted pursuant to this comment.

## 77 Montella, Thea

77.01 Comment asserts that the rich equestrian history of the existing equestrian center was not taken into account in the DEIR analysis of cultural resources.

The CRHR criteria for eligibility are as follows:

*An historical resource must be significant at the local, state, or national level, under one or more of the following four criteria:*

- *It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or*
- *It is associated with the lives of persons important to local, California, or national history; or*
- *It embodies the distinctive characteristics of a type, period, region, or method or construction, or represents the work of a master, or possesses high artistic values; or*
- *It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.*

These criteria are also the criteria contained in the CEQA Guidelines Section 15064.5 (3) A through D for determining if a cultural resource is “historically significant”. These criteria were used in the analysis of historic resources in the DEIR.

As described in Chapter 3.10 of the DEIR, the assessment of historical significance of the existing equestrian center was conducted by peer review of the prior JRP Historical Consulting Services reports prepared in 2001 and 1996 for the equestrian center and the Collins Cottage and Studio by Jones & Stokes, a site visit, a review of plans for construction and grading at the various project sites; and the professional judgment of Jones & Stokes.

It is a standard of analysis that under most circumstances, a cultural resource is not considered a “historic resource” unless it is at least 50 years old. For properties that are less than 50-years old, the CRHR guidelines specify that “sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than fifty years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.”

Integrity is the authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance. Historical resources eligible for listing in the California Register must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is proposed for eligibility.

The equestrian center is comprised of a complex of 19 buildings and 7 major features, all related to the primary function of the facility as a stable and equestrian training facility. Based on the

evaluations of JRP and the peer review of Jones & Stokes, the area as a whole is not considered eligible for listing in the CRHR because the complex as a whole lacks integrity of design, materials, workmanship and feeling to its period of significance. Most of the buildings within the Proposed Project area were built or moved onto the site in the late 1960s or later; as such these younger buildings are not considered to be associated with historical events or people nor to meet the other CRHR criteria and are thus not considered historical resources for the purposes of the DEIR because they do not meet the criteria for CEQA.

There are three buildings older than 50 years within the area, however: the Collins Cottage, the Collins Studio, and Building No. 9 at the Equestrian Center.

- The Collins (James) Cottage was previously evaluated for eligibility for listing in the California Register of Historic Resources (JRP 2001a). This Craftsman style house was built between 1912 and 1913 as a private residence. Citing a lack of significant historic associations, the previous evaluation recommended that this property is not eligible for the CRHR. Although the original owner, Austin James, was active in the early twentieth century Carmel art scene, he does not appear to have achieved the special significance necessary for CRHR consideration. Additionally, the house is a modest example of the Craftsman style as compared to others in the area and is not distinctive. Although the cottage retains a good degree of integrity of workmanship, design and materials, its setting has been substantially altered by construction of a much larger house and barn nearby. Therefore, for these reasons, the Collins (James) Cottage is not considered a historical resource for the purposes of CEQA because it does not meet the criteria of association with historic events, association with historic persons, possess distinctive characteristics, or have the potential to yield important historical information.
- The Collins Studio was originally a part of the Proposed Project, however it was destroyed by a storm and subsequently demolished through a County-issued demolition permit during the application process.
- Building No. 9 at the Equestrian Center was also previously evaluated for eligibility for listing in the CRHR (JRP 1996). That analysis was part of an evaluation of the entire Equestrian Center complex. This quadrangle-type stable was built in 1924 as the Del Monte Properties Pebble Beach Stables. Citing a lack of significant historic associations and a lack of historic integrity, the previous evaluation recommended that this complex is not eligible for the CRHR. The building and the overall complex do not retain historic integrity to the early period of Pebble Beach establishment (pre-World War II). Therefore, Building No.9 is not considered a historical resource for the purposes of CEQA because it does not meet the criteria of association with historic events, association with historic persons, possess distinctive characteristics, or have the potential to yield important historical information.

Although there may be a disagreement between the commenter's opinion, and that of JRP and Jones & Stokes architectural historians, the comment has not identified any substantial new information that would warrant any change in the text of the DEIR, nor in the conclusions regarding the existing equestrian center.

- 77.02 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.

- 77.03 Please see Master Responses for Alternatives MR-ALT-1 and Land Use, MR-LU-2 and MR-LU-3 in Chapter 2.
- 77.04 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 77.05 Regarding impact to Monterey pine forest, please see MR-BIO-5 in Chapter 2 of this document. Regarding the relocation of the equestrian center, please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2. The proposed project includes a new equestrian center of the same size and nature as the existing equestrian center within Pebble Beach as the commenter requests in the event of relocation.

## **63 “Monterey Peninsula Residents”**

- 63.01 This comment is noted. The comment includes signed petitions from Monterey Peninsula residents and support protection of environmentally sensitive habitats and Monterey pine forest.



## **75            Morgan, Karen**

75.01    Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.

## 108      **Newton, Andrew**

- 108.01 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2. The comment also questions the need for an additional golf course on the Monterey Peninsula. The need for or economic feasibility of a new golf course is not an issue that requires analysis under CEQA.
- 108.02 The comment suggested that there would be no need for a New Equestrian Center if the existing Equestrian Center were upgraded. Moving the existing equestrian center is necessary to achieve the applicant's goal of developing a new golf course. Please see Chapter 5, Alternatives for an analysis of alternatives to the proposed project.

### **33 Nielsen, Arthur B. and Kathleen C.**

- 33.01 This comment is noted. The comment does not favor the project.
- 33.02 This comment is noted. The comment does not address a specific DEIR analysis, and thus, a specific response cannot be provided.
- 33.03 Comment noted. The comment did not raise any specific issues related to the adequacy of the analysis in the DEIR. The comment requested the County delay project approval to provide the additional time to study construction traffic impacts at the entrance to the Inn at Spanish Bay. Construction impacts were analyzed in the DEIR and mitigated to less than significant.

## 24 O'Brien, Janice M.

- 24.01 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 24.02 Please see Master Response for Land Use MR-LU-3 Policy Consistency in Chapter 2.
- 24.03 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 24.04 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 24.05 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 24.06 As required by CEQA, the DEIR analysis is focused on adverse physical impacts. Economic or social impacts are not required to be evaluated. Land use compatibility issues are addressed in Chapter 3.1 of the DEIR.

Chapter 3.6 addressed aesthetic impacts of the project. DEIR Impact AES-B1 addresses potential degradation of the visual character and quality of proposed development areas, namely the Proposed Golf Course, Spanish Bay Employee Housing, and Residential Subdivisions. The Proposed Project would potentially degrade the visual character of proposed development areas by introducing new structures and recreational facilities with associated landscaping, grading, and paving.

Existing trees and new landscaping would substantially screen views of the Proposed Golf Course, New Equestrian Center, Spanish Bay Resort, Spanish Bay Employee Housing, The Lodge at Pebble Beach, and Corporation Yard Employee Housing; however, some portions of the new buildings would be partially visible through roadside vegetation. These changes are considered less than significant with implementation of Mitigation Measures AES-B1-1 and AES-B1-2, which require planting of additional landscaping and design features.

Mitigation Measure AES-A1-2 also requires incorporation of the following design features and landscaping to reduce the project's effects related to residential development:

- Structures associated with new single-family residential development should be set back from parcel property lines so as to minimize the project's visibility as seen from sensitive public viewing locations.
- Landscape buffers should be preserved along the site perimeters in order to maximize screening of public views.
- The selection of exterior building materials and colors should be designed to reduce potential visual contrast between the new development and the surrounding natural landscape and to maximize the project's aesthetic integration into the surrounding landscape.
- New landscaping should be specified and placed in a manner that blends into the surrounding natural landscape.

- 24.07 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 24.08 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 24.09 This comment is noted, but does not address a specific DEIR analysis, and thus, a specific response cannot be provided. As indicated above, CEQA does not require analysis of economic or social issues.

## 20 Parker, Dave & Patty

- 20.01 The comment addresses visibility of the Spanish Bay driving range teaching facility to nearby residences. The entire driving range would be buffered by a 100-foot-wide strip of forest.
- 20.02 Noise impacts associated with the Proposed Project are discussed in Chapter 3.9. Traffic impacts of the Proposed Project are discussed in Chapter 3.7. No change to the DEIR is required.
- 20.03 Moving the teaching facility further to the west is not feasible due to the design of the driving range, which has two sets of tees at opposite ends of the driving area. Figure 2.0-14 shows the site plan for the driving range, which has a heavily landscaped border around the entire facility.
- 20.04 Comment raises concern about the impacts of wildlife displacement on homes in the Del Monte Forest (e.g., health hazards to pets and landscape destruction).

DEIR Impact BIO-E1 (Chapter 3.3, Biological Resources) addresses reduction of habitat for common wildlife species and plant communities. This impact is offset by the applicant's proposed preservation areas, site-specific RMPs, and mitigation recommended for sensitive communities and special status species.

Wildlife displaced from areas of project development are anticipated to move into adjacent preservation areas that are retained. In the case of Area C, this would be the Navajo Tract, Rip Van Winkle Park, and the portion of Area B that is proposed to be preserved by this project. The greatest period of displacement will occur at the initial grading period.

While common wildlife such as deer and raccoon are accustomed to human presence and will forage on landscaping, pet food, and garbage, displaced wildlife is unlikely to settle in adjacent residential areas at any greater frequency than at present and this is considered a less than significant impact.

- 20.05 Noise impacts associated with the driving range are discussed on page 3.9-5 of the DEIR. The County has determined that the noise impact associated with use of the driving range would be less than significant. As stated in the project description, the driving range would operate between dawn and dusk. There would be no need for lighting the driving range other than security and safety lighting, which would not present a significant impact on nearby residences.

## 30 Parrish, Richard

- 30.01 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 30.02 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 30.03 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 30.04 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 30.05 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 30.06 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 30.07 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 30.08 Traffic impacts, including proposed relocation of the Equestrian Center, are addressed in Chapter 3.7 in the DEIR.
- 30.09 The comment expressed concern about reduced access to Sombria Lane resulting from road closures associated with development of the Proposed Golf Course. The impacts of the road closures are analyzed in Chapter 3.7 of the DEIR and, with improvements proposed by the applicant, were determined to be less than significant.
- 30.10 This comment is noted. The comment does not raise any concerns related to specific analyses in the DEIR.
- 30.11 This comment is noted. The comment did not raise any concerns related to specific analyses in the DEIR.
- 30.12 Please see response to comment 30.09 above and Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

## **88          Parsons, N.**

88.01    This comment is noted



## **87          Parsons, R.**

87.01    This comment is noted. The comment urges rejection of the golf course project.

## **80 Redfern, Greg**

- 80.01 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 80.02 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 80.03 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 80.04 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

## **81 Redfern, Susan**

- 81.01 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 81.02 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.
- 81.03 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 81.04 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

## **22            Rodgers, John**

22.01    This comment is noted.

22.02    This comment is noted.

22.03    Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and  
Open Space in Chapter 2

## **92 Rosenthal, Richard H.**

- 92.01 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.

## **79 Sawyer, Jean**

- 79.01 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 79.02 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 79.03 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 79.04 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 79.05 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2.

## 40 Shepner, Robert W.

- 40.01 This comment regarding the location of a golf course proposed in 1992 is noted. Please see Master Response for Alternatives MR-ALT-1 Range of Alternatives in Chapter 2.
- 40.02 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 40.03 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 40.04 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 40.05 Comment asserts that existing golf courses more than satisfy current demand and asks why another golf course is necessary.

The subject of this EIR is a private applicant's application to develop certain portion of its land, including a new golf course. The purpose of an EIR is to describe the proposed project, evaluate its environmental impacts, identify mitigation and alternatives. It is not the purpose of the EIR to evaluate the need for private development such as another golf course, but rather to disclose the potential environmental impacts should Monterey County ultimately decide to approve the application or some portion thereof. In summary, the "need" for private development is not a matter for CEQA, which is limited to the evaluation of environmental effects.

The applicant's objectives for the proposed project are identified on page 2.0-1 in Chapter 2., Project Description.

- 40.06 Comment asserts that tourist "housing" (presumably a reference to visitor-serving units) more than adequate, that tourist employee housing is inadequate, and that the Proposed Project does not alleviate the problem.

As noted above, the "need" for private development, such as additional visitor-serving units is not a matter for CEQA, which is limited to the evaluation of environmental effects.

Regarding employee housing, Monterey County evaluates private development for compliance with the County's Inclusionary Housing Ordinance (Chapter 18.40 of the Monterey County Codes, Ordinance 04185) which requires that housing developers include a certain percentage of affordable housing units in their projects. As identified in Appendix D, Policy Consistency, (P. D-84, Policy 116), the project is required to provide 15% contribution for inclusionary housing. This requirement works out to 14 units (or 13 units and an in-lieu fee), which can be provided by placing restrictions on a portion of the employee housing units included within the Proposed Project to require low or very-low income households utilize them.

While provision of affordable housing is a goal of Monterey County, resolution of all existing housing imbalances is not a requirement of new development, except as required by the Inclusionary Housing Ordinance as discussed above.

## **17 Singleton, Mr. And Mrs. Ernest J.**

- 17.01 This comment addresses issues regarding Bristol Curve. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the EIR analysis was revised regarding Bristol Curve issues and recirculated in the PRDEIR in September 2004. Comments related to the revised analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-7 in Chapter 2.



## 19 Taft, Vladimir

- 19.01 The DEIR includes 8 mitigation measures that would reduce construction noise impacts to a less-than-significant level. Noise impacts associated with parking lot use is discussed on page 3.9-5. The County has determined that this noise impact is less than significant. No change to the DEIR is required.

- 19.02 Comment opposes construction of the employee parking lot at Spanish Bay because it will result in “heritage” trees being cut down.

The Del Monte Forest Land Use Plan makes a distinction between “landmark” trees and other trees, but has no definition of “heritage” trees. Presuming the comment meant to refer to landmark trees, the following additional information is provided in response.

Landmark trees are defined in the LCP as either: shown on the Figure 2A of the Del Monte Forest LUP as shaded or asterisked; the Monterey cypress grove in the Pescadero Point/Cypress Point area, shown on Figure 2 in the Del Monte Forest LUP; any coast live oak over 24 inches in diameter; or any native tree 24 inches in diameter or more, or any tree that is “visually significant, historically significant, exemplary of its species or more than 1000 years old.”

Impacts to landmark trees are addressed in the DEIR on page 3.3-65. DEIR Table 3.3-6, after pg. 3.3-62 identifies the tree type and size that would be removed for the Spanish Bay Driving Range and the Parking Lot within Area C. Mitigation for loss of Monterey pine forest and removal of individual trees (Monterey pines and Coastal live oak) are presented in DEIR Chapter 3.3.

No landmark trees have been identified in surveys of Area C. Thus the DEIR has not identified removal of landmark trees as a significant impact for the Spanish Bay parking lot in Area C.

- 19.03 The pollutant impacts of concern at the parking lot for the new visitor units would be from carbon monoxide (CO). A dispersion modeling analysis of CO impacts was conducted for the location with the potential for having the highest CO concentrations associated with the Proposed Project, the intersection of Highway 68 and Highway 1 southbound ramps. Hourly traffic volumes at this location, based on the results of the traffic study conducted for this project, would be 4,260 vehicles per hour in the p.m. peak under future cumulative-plus-project conditions. This hourly volume is much higher than vehicle ingress or egress would be at any time in the parking lot.

This analysis is discussed in Chapter 3.8, Section B, of the DEIR. CO concentrations were estimated for 2010 and 2020 project conditions. The modeled CO concentrations showed no violation of either the 1- or the 8-hour CO state standard. As this is a worst-case location for CO impacts, CO concentrations at other locations affected by the Proposed Project would be lower.

- 19.04 The project description on page 2.0-8 clearly identifies a 301-space surface parking lot as part of the Spanish Bay Driving Range. Guests and employees at the Inn at Spanish Bay would also use this parking.

- 19.05 This comment suggests alternatives to the proposed Spanish Bay driving range parking lot. An alternative to consolidate parking with the proposed underground Spanish Bay parking lot is addressed in DEIR in Alternative 3 – Reduced Land Use Intensity on pages 5.0-17 through page 5.0-21. The other suggestions are noted and may be desired by the commenter, but are not necessary as mitigation for significant impacts of the project. Alternative access does not need to be provided, as access to the subject property along Majella will not be impeded by the project.

Further separation of the parking lot from the subject property is not necessary to address any project significant impacts such as aesthetics or noise.

## **90 Thompson, J. & E.**

90.01 This comment is noted

## 14 Tormey, John F.

- 14.01 This comment is noted. The comment indicates that EIR should acknowledge the cash/benefit analysis and private property rights. CEQA does not require analysis of economic or social impacts.
- 14.02 The Executive Summary, Project Background section, addresses the three PBC proposals for buildout and preservation of the DMF. A comparison of these three proposals – the Pebble Beach Lot Program (1992), Refined Alternative 2 (1997), and the Proposed Project – is provided in Table ES-1.
- The Regulatory Setting section addresses the DMF Land Use Plan (LUP), the Coastal Implementation Plan (CIP), and the coastal zoning ordinance (Title 21 of the County Code), which together constitute the DMF Local Coastal Plan (LCP). The Regulatory Setting for the Proposed Project is included as Appendix C of the DEIR.
- 14.03 This comment is noted. The comment suggested that a better word than “dedication” could be found to describe the preservation elements of the Proposed Project.
- 14.04 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 14.05 Comment requests that text clarify that Del Monte Forest is private land. It is clear from the text in the DEIR that the project is located on land owned by the Pebble Beach Company. The ownership of the remainder of Del Monte Forest is not at issue. No revision is warranted.
- 14.06 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 14.07 Please see Master Response for Public Services & Utilities MR-PSU-1 Police Services in Chapter 2. Also see Chapter 3, Revisions to the DEIR and PRDEIR for revisions to mitigation measure PSU-A2.
- 14.08 The text on page 3.8-1 has been revised as suggested for clarity.
- 14.09 Please see Master Response for Land Use MR-LU-1 Measure A in Chapter 2.
- 14.10 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 14.11 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 14.12 This comment addresses Yadon’s piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon’s piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 14.13 This comment addresses issues regarding Bristol Curve. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the EIR analysis was revised regarding Bristol Curve issues and recirculated in the PRDEIR in September 2004. Comments related to the revised analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-7 in Chapter 2.

- 14.14 Editorial changes made as requested.
- 14.15 The Proposed Project does not change zoning for any of the project areas; thus it does not need to be noted that existing zoning is presently operative. Measure A, if certified by the CCC, would change zoning in the Del Monte Forest as described in the measure; however, this has not yet occurred. While the applicant has designed the Proposed Project to be consistent with Measure A, the project is a development proposal and is not synonymous with Measure A, which is a proposed change in the Local Coastal Plan approved by Monterey County voters. No revision is warranted.

## **89 Troutman, J.**

- 89.01 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 89.02 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 89.03 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.

## 21 Verbonec, Rick

Comment submitted minor editorial suggestions that are addressed below.

- the location of the Old Capitol Site and the Aguajito site are noted in figures in Appendix E in the PRDEIR;
- page references for every single impact and mitigation measure in Table ES-2 are not required to provide an adequate analysis and have not been added;
- reference to offices of the DMFF and DMFPO have been added to Section 2; and
- typos corrected on pages 2.0-4, 3.3-16, 3.3-19, 2.0-26, 4.4-6. As stated in the project description, the driving range would operate between dawn and dusk. There would be no need for lighting the driving range other than security and safety lighting, which would not present a significant impact on nearby residences.

## 71 White, Marie

- 71.01 Comment questions why the revegetation at the Sawmill Gulch site was unsuccessful, and how the ‘revegetation plan’ was developed.

A revegetation plan was developed by the applicant in the 1990s in order to implement revegetation of the Sawmill site as required by the original Spanish Bay Resort use permit and coastal development permit conditions. As disclosed in the DEIR, to date the revegetation effort has only been partially successful in restoring forest to the Sawmill site.

The purpose of this EIR is to assess the reasonably foreseeable impacts of the current Proposed Project. To that end, the DEIR assessed and disclosed the physical conditions of the project area, including the Sawmill site, as a physical baseline for the Proposed Project. The DEIR did not analyze the reasons why prior revegetation efforts within the project area were partially successful; such analysis was not necessary to analyze the physical effects of the current Proposed Project. That said, the soil and drainage conditions at the Sawmill site have been highly altered due to previous sand mining. It is likely that these conditions are limiting tree growth and understory development.

As described in Master Response LU-2, Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2., the Proposed Project would eliminate the potential completion of the revegetation effort across the Sawmill site. Thus, the Proposed Project must not only mitigate for the physical impacts on the environment as it existing today, but must also mitigate for the foregone opportunity complete reforestation at the Sawmill site. This “foregone restoration” area of about 23 acres at the Sawmill site was treated as if the restoration had resulted in 23 acres of complete forest and included in assessment of impacts and design of mitigation, including the calculation of additional preservation needed for cumulative impacts.

The commenter is directed to Master Response LU-2 Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2 for further discussion.

- 71.02 Comment asserts that mitigation should only address impacts of the Proposed Project, and not be combined with mitigation addressing the Spanish Bay permit conditions.

Please see Master Response Master Response LU-2, Spanish Bay Permit Conditions and Sawmill Easements in Chapter 2.

- 71.03 Please see Master Response for Biological Resources MR-BIO-9 Resource Management Plans in Chapter 2.

- 71.04 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2 and the response below to Comment 71.17.

- 71.05 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.

- 71.06 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.

- 71.07 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.



- 71.08 This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources MR-BIO-6 in Chapter 2.
- 71.09 Comment questions proposed management (who/how) for the Gowen cypress/Bishop pine forest. DEIR Mitigation Measure BIO-B1-1 (Chapter 3.3, Biological Resources) requires the development, implementation, and monitoring of Monterey County-approved Master RMP and site-specific RMPs for all retention, restoration, and preservation areas, including the Gowen Cypress/Bishop Pine ESHA adjacent to F-3.
- The applicant is responsible to fund and implement restoration management under the oversight of Monterey County. Please see Master Response MR-BIO-9 and the Master RMP in Appendix A of this document.
- 71.10 Comment questions how PBC will ensure residential property-owner compliance (when/how/if not) with landscaping mitigation for Gowen cypress. DEIR Impact BIO-D2 (Chapter 3.3, Biological Resources) addresses potential loss or disturbance of up to 20 Gowen cypress trees, due to residential development and/or utility line installation.
- Residential property-owner compliance with proposed Mitigation Measure BIO-D2 for Gowen cypress is anticipated through the placement of the location of individual Gowen cypress trees and their required buffers on the lot maps, as well as deed restrictions to guarantee implementation of the site-specific RMP requirements and avoidance of these trees. These restrictions would be part of the approval process for actual residential lot development and will be binding on the individual property owner.
- Mitigation Measure BIO-B1-4 has been clarified (see Chapter 3) to indicate that the applicant shall be responsible for resource management of the areas outside the building envelopes (but within new lot lines) at the residential subdivisions. All deed documents for new residential lots shall provide for applicant access to conduct resource management activities, independent monitor access to monitor resources and resource management implementation, and County access to ensure compliance with required permit conditions.
- 71.11 Please see Master Response for Biological Resources MR-BIO-8, Pacific Grove Clover, in Chapter 2.
- 71.12 Comment questions what baseline was used for assessing impacts to Hooker's manzanita. The baseline used in the DEIR for assessing potential impacts is the Biological Resources Setting, Appendix E. The Biological Resources Setting (pages E-25—E-26) contains species, distribution, and habitat descriptions for Hooker's manzanita. Impact BIO-D4 (pages 3.3-45—3.3-47) addresses potential loss or disturbance of Hooker's manzanita. As noted in the DEIR, indirect effects were considered in the impact analysis, but not quantified because the indirect effects (such as indirect irrigation, pesticides, herbicides, opening of forest canopy, trampling by foot traffic, competition from escaped landscaping) vary in their intensity and area of effect. While indirect effects are probably within the areas immediately adjacent to development, they are not considered to result in wholesale loss of adjacent Hooker's manzanita. The evidence for this is the continued presence of Hooker's manzanita in numerous forested areas in the Del Monte

Forest adjacent to development. The primary threats to Hooker's manzanita are habitat removal, which is quantified in the impact analysis.

- 71.13 Comment questions how the preconstruction survey for pine rose will be developed and implemented, and where survey records will be maintained.  
Preconstruction surveys for pine rose will be conducted by a qualified biologist prior to groundbreaking for each project site. The biologist conducting the survey will be required to record the survey results. The applicant or their contractors will be required in final construction plans to identify that the survey results have been incorporated and that pine rose are being avoided where feasible and removed and replanted where not. Mitigation Measure BIO-D4 requires the County to inspect construction sites to verify compliance with this condition.
- 71.14 Please see Master Response for Public Services & Utilities MR-PSU-1 Police Services in Chapter 2.
- 71.15 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 71.16 DEIR Mitigation Measure PSU-G1 (Chapter 3.5, Public Services and Utilities) requires coordination between the project applicant and utility service providers in order to minimize or eliminate utility service interruptions. Measures will be taken to maintain service of existing water and sewer line connections during Project construction.
- 71.17 Please see Master Response for Public Services & Utilities MR-PSU-3 Parks, Recreation and Open Space in Chapter 2. While the project will result in removal of native forest in certain areas for project development, these areas are predominantly designated for development, not open space forest. Further, the project will dedicate hundreds of acres of native forest that are designated for residential development in the existing Land Use Plan and their dedication will provide for future opportunities to enjoy contiguous open space. As one example, the project and mitigation will result in dedication of over 100 acres of additional forested land in and around the existing HHNA, which will expand the area of contiguous open space available for future enjoyment. In HHNA, Area PQR, and other parts of the Del Monte Forest, the project will maintain extensive areas of contiguous forest that can be enjoyed in perpetuity. Given this context, the EIR does not find a significant loss of contiguous open space relative to recreational use or enjoyment.
- 71.18 Please see Master Response for Public Services & Utilities MR-PSU-1 Police Services in Chapter 2.
- 71.19 Construction contractors are subject to the same traffic laws that all persons using the DMF are subject to. It is speculative to assume that construction traffic or construction contractors and subcontractors are going to violate speed limits. It is therefore inappropriate for the DEIR to recommend mitigation for enforcing traffic laws.
- 71.20 Maintenance of private roadways is the responsibility of the owner. New residents and visitors to Pebble Beach would be subject to the same fees as other residents, a portion of which would be used to maintain roads as determined by PBC.

## **67 Wiltse, Mary**

- 67.01 This comment is noted. Comment indicates that the Pebble Beach Equestrian Center has been managed responsibly by the Pebble Beach Company and the equestrian center leaseholder.
- 67.02 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 67.03 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.
- 67.04 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.

## 8 Wylly, Phillips

- 8.01 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 8.02 DEIR Impact HWQ-C2 (Chapter 3.4, Hydrology and Water Quality) addresses the potential water quality impacts of pesticide and herbicide use at the Proposed Golf Course, New Equestrian Center, and Spanish Bay Driving Range. Runoff quantity and quality would be controlled through catch basins, bioswales, and detention and/or retention basins.
- DEIR HWQ-C4 (Chapter 3.4, Hydrology and Water Quality) addresses the potential water quality impacts of use of reclaimed wastewater and fertilizer use at the Proposed Golf Course, New Equestrian Center, and Spanish Bay Driving Range. The applicant proposes drainage of the Proposed Golf Course through vegetated buffers that would allow for additional nitrogen uptake and denitrification prior to entry into site wetlands and drainages.
- As stated in the DEIR, Impacts HWQ-C2 and HWQ-C4 are both considered less than significant with implementation of 1) the applicant's proposed drainage improvements, including detention and retention facilities; 2) project mitigation concerning wetlands hydrology (HWC-A1-1 and HWQ-A1-2); 3) project mitigation concerning stormwater drainage infrastructure (HWC-B1-1 and HWQ-B1-2); 4) project mitigation concerning wetlands biology (BIO-C1-1, BIO-C1-2, and BIO-C1-3); and 5) all of the measures within the Best Management Practices (BMP) Plan. The BMP Plan also includes an integrated pest management (IPM) program for irrigation and pesticide application management procedures for the Proposed Golf Course.
- 8.03 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 8.04 This comment addresses water supply issues. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the water analysis was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised water analysis in the PRDEIR are addressed in Master Response for Public Services MR-PSU-2 in Chapter 2.
- 8.05 Please see Master Response for Transportation and Circulation MR-TC-2 Construction Traffic in Chapter 2.
- 8.06 Forest Lake Road will be widened south of RLS. Transitions from the widening will not have an impact on RLS parking or access.
- 8.07 Chapter 3.7 in the DEIR provides a detailed assessment of traffic impacts associated with the Proposed Project. Tables 3.7-4 through Table 3.7-6 provide a comprehensive analysis of the impact of project traffic on the surrounding road system after the project has been completed. This analysis represents 37 road segment locations in the Forest, 7 intersections in the Forest, 5 Forest Gates, and 19 intersection locations outside the Forest. DEIR Table 3.7-4 indicates that all road segments within the Forest will operate at acceptable Level of Service C with the addition of project traffic.
- Critical studies to assess whether adequate roadway capacity exists are based on peak hour traffic flows not annual traffic flows. The peak hour traffic flow represents the one hour during the day that traffic volumes are highest. If the peak hour traffic flows are at Level of Service C or better then it follows that traffic flow at all other times during the day is Level of Service C or better.

- 8.08 Chapter 3.8 in the DEIR provides a detailed assessment of air quality impacts associated with the Proposed Project. Emissions of NO<sub>x</sub> and ROG from construction equipment could lead to the formation of ground-level ozone (smog), as these pollutants react photochemically to produce ozone. However, combustion emissions, including NO<sub>x</sub> and ROG, from construction projects have been accounted for in regional air quality planning and would not lead to a violation of air quality standards for ozone.
- 8.09 Chapter 3.9 in the DEIR provides a detailed assessment of traffic noise impacts associated with the Proposed Project. Chapter 3.8 addresses air quality impacts. Chapter 3.3 addresses biological impacts. No change to the DEIR is required.
- 89.10 Please see Master Response General Issues MR-GEN-3 Mitigation Monitoring in Chapter 2.

# Applicant

## **69 Pebble Beach Company (Lombardo & Gilles representing)**

- 69.01 Comment does not identify any specified inconsistency and thus merits no response.
- 69.02 This comment is noted
- 69.03 Throughout the document, all references to a net increase in new trails are changed from 3.6 miles to 2.4 miles. A revised Figure 2.0-32 is included herein.
- 69.04 A new bullet is added to the project description on page 2.0-15 to show that 500 lf of 4-inch sewer line would be installed northerly along Stevenson Drive to an existing main. Commenter should note that PBSCD commented that the minimum diameter sewer line for new development is 8 inches. All improvements to utilities will be subject to approval by the appropriate agencies prior to granting of construction permits.
- 69.05 A revised Figure 2.0-32, Trail Relocations and New Trails, is included herein. The new trail map deletes the proposed new trails along Lopez and Congress Roads.
- 69.06 Comment noted. The comment stated that the applicant is proposing to develop fewer lots than legally exist today and that any additional lots beyond the applicant's proposal would be extinguished.
- 69.07 The text on page 3.1-5 line 8 is changed to add: "Only 1300± lf of new PQR trails would be built. All others would be on existing fire roads and designated as trails."
- 69.08 This comment is noted.
- 69.09 Comment suggests that building envelope avoidance of steep slope areas is an alternative to exclusion of steep slopes from subdivided residential lots at Area F-3 and PQR. This has been added to the mitigation as noted in Chapter 3.
- 69.10 The word "strongly" has been deleted per this errata comment.
- 69.11 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 69.12 Please see Master Response for Biological Resources MR-BIO-1 Environmental Sensitive Habitat Areas (ESHAs) in Chapter 2.
- 69.13 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.
- 69.14 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.
- 69.15 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.
- 69.16 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.

69.17 Please see Master Response for Biological Resources MR-BIO-2 Dune Habitat and Species in Chapter 2.

69.18 Comment asserts that the DEIR's characterization of the seasonal pond in Drainage I is overstated, and that water salinities are too high to sustain frogs and other aquatic life. Maintenance of water quality and temperature are important upstream of the pond, but comment requests a reduction of the 40 foot buffer to only 25 feet downstream.

CRLF have been observed in the seasonal pond and nearby, and can reasonably be expected to utilize the ESHA pond for foraging and dispersal (though not for breeding). It is possible that the wetlands and the seasonal pond in Area MNOUV constitute a "sink" for CRLF that migrate from the Seal Rock Creek, in that the salinities are too high for successful breeding. Whether or not foraging CRLF at Area MNOUV presently return to Seal Rock Creek or another location to breed cannot be known; similarly it is unknown whether this will occur with implementation of the Proposed Project. The DEIR does not preclude the possibility that the wetlands and seasonal pond may be used for CRLF foraging/dispersal and breeding at off-site locations and thus does not conclude that substantial elimination or alteration of suitable habitat would have no adverse effect on CRLF. In that context, buffers were required as mitigation to preserve the habitat that is present in Area MNOUV for the potential future use by CRLF.

The seasonal pond is not devoid of other life. Aquatic insects utilize the pond and Pacific tree frog tadpoles and juveniles have been observed in the pond. Birds and other wildlife may also utilize the pond as a secluded water source. Given that natural water sources that retain water perennially (in wet years) or late in the season (in drier years) are relatively rare in the Del Monte Forest, the pond provides habitat that is considered valuable for a number of wildlife species. These are the values for which the LCP designated seasonal ponds as ESHA in the Del Monte Forest

The setting for this ESHA is a seasonal pool within a forested setting. LCP policies prohibit substantial modification of ESHA areas. Removal of the forest canopy and replacement with lower-growing shrubs by allowing tree removal within 25-feet as advocated by the comment, would be inconsistent with LCP policy because it would substantially alter this ecological setting.

The 25-foot buffers designated in Mitigation Measure BIO-D5-1 are intended to provide adequate habitat and cover surrounding the wetlands areas that may be used by CRLF and other species. The pond's hydrologic and temperature regime must also be maintained by providing for adequate shading and canopy. The 40-foot buffer was determined based on estimates that it would adequately provide mid-day shade and cover (10 am - 2 pm) for the seasonal pond.

No revision to the DEIR is warranted.

69.19 Comment asserts that the designated building envelope for Lot 1 in Area F-3 is outside of the Gowen Cypress/Bishop Pine ESHA, and that all areas outside of the building envelope should be subject to a provision that precludes disturbance.

Lot 1 is proposed as 2.4 acres and the building envelope in the proposed vesting tentative map encroaches into the ESHA area. Lot 1 contains at most about 50 feet of Bishop pine/Gowen cypress ESHA on the northern side in some locations (e.g. it is a maximum of about 50 feet, but less in other locations along the northern perimeter). With the required buffer (presuming Gowen cypress canopy of about 50 feet) the area excluded from subdivision would be a maximum of about 100 feet from the current proposed northern lot boundary and could result in reduction of the lot size by somewhere between 33% and 50%. Thus, the worst-case is that Lot 1 would be



about 1.2 acres, though it is likely to be somewhat larger due to the irregular edge of the ESHA area. This is more than adequate area in which to place a 0.5-acre building envelope within the subdivided lot. Further, the excluded area includes steep slopes (> 20% and > 30% in some area) on which development should be avoided regardless of ESHA issues.

Comment asserts that it is excessive to assume that habitat will be altered within an entire lot. While negative or scenic easements can preclude expansion of development footprints, informal access by residents and indirect effects of irrigation, landscaping, pesticide/herbicide use, and pets can alter soil and vegetation conditions and this has occurred in the Del Monte Forest and in adjacent areas. The proposed buffer area is warranted to avoid indirect effects of residential development that could degrade the Gowen cypress community. Avoidance of impact is the standard by which development adjacent to ESHAs according to the LCP.

The ultimate owner of Lot 1 might have a smaller lot than that proposed by the applicant, but they will also be directly adjacent to a preserved area. Applicant has provided no substantial evidence why a 1.2- acre lot (at the worst) at the end of a cul-de-sac in this part of the Del Monte Forest, adjacent to hundreds of acres of preserved forest and miles of recreational trails, and within walking distance of Poppy Hills Golf Course cannot produce a reasonable economic return.

69.20 Please see Master Response for Biological Resources MR-BIO-4 Huckleberry Hill Natural Area (HHNA) in Chapter 2.

69.21 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.

69.22 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.

69.23 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.

69.24 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.

69.25 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.

69.26 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.

69.27 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.

69.28 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.

69.29 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.

69.30 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.

69.31 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.

69.32 through 40 These comments address Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the

revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources in MR-BIO-6 in Chapter 2.

- 69.41 Comment asserts that the development envelope will avoid all Gowen Cypress/Bishop Pine ESHA. DEIR Impact BIO-A4 concerns Gowen Cypress/Bishop Pine ESHA. DEIR Impact BIO-D2 (Chapter 3.3, Biological Resources) addresses potential loss or disturbance of up to 20 Gowen cypress *trees*, due to residential development and/or utility line installation. Impact BIO-D2 does not concern the ESHA area; though it is mentioned for consistency. The comment is technically correct that the “development envelope” will avoid the ESHA area. However, the DEIR correctly identifies that the ESHA area could be affected by indirect effects of adjacent residential development and adopts a buffer accordingly to avoid these indirect effects.
- 69.42 Please see Master Response for Biology MR-BIO-8 regarding Pacific Grove Clover.
- 69.43 Monterey County is aware that CNPS is a private environmental group. The CNPS rare plants list has been commonly used for CEQA analysis. CDFG has considered plants on List 1B and 2, in particular to merit review during CEQA review. Appendix E, page E-14 describes that CNPS List 1B plants in particular, are considered for this EIR to meet the CEQA definition of “rare” and as such are included in reference to “special status plants” within the EIR. The purpose of inclusion of the CNPS List 1B plants, as well as plants that meet the other criteria listed on page E-14 and E-15 is to identify those species that meet the CEQA definition or “rare” and thus warrant particular focus of the biological resource analysis.
- Nowhere does the text imply that presence on a CNPS list equals local, state, or federal protection. Comment enters no evidence as to why a particular species included in the analysis in this EIR is not rare and should not be evaluated in this EIR. The EIR preparers reviewed the literature regarding species to be included in the evaluation of rare species.
- Corrections have been made to Table E-8 to clarify that presence on the CNPS rare plants List 1B is not a legal status pursuant to state or federal law, but for this EIR, the List 1B plants are considered “rare” for the purposes of CEQA.
- 69.44 See response to 69.43.
- 69.45 See response to 69.43.
- 69.46 See response to 69.43.
- 69.47 Comment requests to be allowed to remove overstory within the proposed 25-ft buffer downstream of the seasonal pool in Drainage I. Please refer to response above to comment 69.18.
- 69.48 Comment requests change wording for CRLF breeding requirement. “**Maximum** ponded water depth... 2 to 3 feet **during the wet season**, with water present through July.” Comment incorporated into revision of Mitigation Measure BIO-D5-4 as presented in Chapter 3.
- 69.49 This comment is noted.
- 69.50 As stated in the DEIR, Impact HWQ-B1 (Chapter 3.4, Hydrology and Water Quality) is considered potentially significant because the project may contribute stormwater flow that exceeds the capacity of downstream stormwater infrastructure, and also because current site plans do not provide sufficient site-specific detail to verify that drainage improvements will meet County requirements. Mitigation Measure HWQ-B1-1, which requires identification and construction of all downstream drainage improvements necessary to adequately handle increased

- stormwater flows from the Proposed Project, ensures that potential impacts are reduced to a less than significant level.
- 69.51 This comment is noted.
- 69.52 Please see Master Response for Public Services & Utilities MR-PSU-1 Police Services in Chapter 2.
- 69.53 Please see Master Response for Public Services & Utilities MR-PSU-1 Police Services in Chapter 2.
- 69.54 The photo simulation of the Proposed Golf Course was revised after circulation of the administrative DEIR to include additional trees between the realigned Stevenson Drive and the Proposed Golf Course. The revised simulation is based on aerial photography and engineering plan drawings provided by the applicant and, in the opinion of the consultant preparing the simulation, accurately portrays the planned project. In this comment, the applicant suggests that there would be more trees and more of a buffer between the road and the golf cart path. That is not readily apparent from the plan drawings, but would be consistent with proposed mitigation for the aesthetic impacts of the Proposed Golf Course.
- 69.55 The photo simulation of the Spanish Bay Employee Housing is based on aerial photography and engineering plan drawings provided by the applicant. In the opinion of the consultant preparing the simulation, it accurately portrays the planned project. In this comment, the applicant suggests “substantial landscape screening will minimize view of units contrary to this simulation.” This substantial landscape screening is not apparent in the plan drawings, but would be consistent with the proposed mitigation for aesthetic impacts related to the proposed Spanish Bay Employee Housing.
- 69.56 Please see Master Response for Transportation and Circulation MR-TC-2 Construction Traffic in Chapter 2.
- 69.57 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 69.58 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 69.59 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 69.60 The DEIR does recognize the elements of the applicant’s Facilities Trip Reduction Plan that was submitted with the project application (page 3.7-39, lines 35-41). The shuttle service for visitors is described in the Existing Conditions section (page 3.7-52, line 34). The County has determined that the Proposed Project is inconsistent with the Del Monte Forest LUP and the trip reduction ordinance, resulting in a significant impact.
- 69.61 The DEIR identified a finding of a potential significant impact from TACs in diesel exhaust, as there was no quantitative analysis of the risk associated with diesel TACs. The MBUAPCD commented that either a risk assessment be performed showing the risk to be below district thresholds (10 in one million), or catalytic particulate filters be used on diesel equipment. In response to the MBUAPCD comment, Mitigation Measure AIR-C2 from the DEIR has been revised to require use of low sulfur fuels and catalytic particulate filters. Comment provides no evidence that the potential impact may not occur. Catalytic particulate filters are available and

have been approved by the California Air Resources Board (CARB) for use in California (see <http://www.arb.ca.gov/diesel/verdev/level3.htm>).

- 69.62 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 69.63 Please see Master Response for Biological Resources MR-BIO-5 Monterey Pine Forest in Chapter 2.
- 69.64 Please see Master Response for Public Services & Utilities MR-PSU-1 Police Services in Chapter 2.
- 69.65 See response above to Comment 69.61.
- 69.66 A cumulative impact can result from the combination of two or more impacts that are individually less than significant, but constitute a significant change in the environment when considered together. The project's individual contribution to the change in vehicle/capacity ratio at both Highway 1/Ocean Avenue and Highway 1/Carmel Valley Road is less than 1% and, therefore, less than significant. However, the cumulative change is more than 10%, which is considered a significant cumulative impact.
- 69.67 Please see Master Response for Transportation and Circulation MR-TC-1 Highway 68 (Holman Highway) in Chapter 2.
- 69.68 A cumulative impact can result from the combination of two or more impacts that are individually less than significant, but constitute a significant change in the environment when considered together. The project's individual contribution to the change in vehicle/capacity ratio at both Highway 1/Carpenter Road and Highway 1/Rio Road is less than 1% and, therefore, less than significant. However, the cumulative change is more than 10%, which is considered a significant cumulative impact.
- 69.69 Comment asserts that the 9-hole expansion of Spyglass Hill component of Alternatives 2 and 3 is infeasible because:
- the physical space identified in Figure 5.0-1 is inadequate to accommodate 9 championship holes;
  - a 9-hole expansion would only produce one third (18,750) rounds compared to the Proposed Project due to Founder's Club and NCGA control of certain times of play;
  - the demand for hotel rooms generated by 18,750 rounds would be far less than that needed to support the hotel rooms included in the Proposed Project;
  - the revenue from the 9-hole expansion of Spyglass would not provide for a reasonable return on investment because it would cost \$40 million, fees for new rounds involving the new 9-hole circuit would demand \$75 - \$100 less than that at Spyglass today, would result in annual revenue of only \$1million, and thus would require nearly a 40-year payback period;
  - the golfing public would not accept the new addition;
  - a 9-hole addition that kept the existing equestrian center in situ or had an operationally feasible design would have similar if not identical impacts to the Proposed Project; and
  - the other elements of Alternative 2 and 3 are not necessary to mitigate project effects; and

- these alternatives would negatively affect the project objectives.

Each of these assertions is address below.

- **Physical Space** - The DEIR describes that the alternative component would provide about 100 acres for development of 9 championship-style golf holes. The applicant's proposed 18-hole golf course would cover about 172 acres. With half the need for space of the Proposed Project but more than half the acreage, there is ample space remaining in which to put 9-holes. Routing will be a challenge; however as noted in the DEIR, one possibility Hole No. 1 could be routed along the current Hole No. 18, Holes 2 through 6 could be placed within the existing equestrian center and Collins Field, Hole No. 7 could be placed along the current Hole No. 14, and Holes 8 and 9 could be placed within the disturbed areas in the Spyglass Quarry. Figure 5.0-1, as noted in the DEIR only identifies conceptual development and preservation areas; no specific routing design has been developed. On a broader note, the concept of this alternative is not to exactly use the development and preservation areas noted in Figure 5.0-1; it would be possible to make some adjustments in the configuration of these areas to accommodate golf course routing provided the wetlands are avoided and provided with adequate buffers, the ESHA wetland is provided with a 100-foot buffer, the seasonal pond is provided with an adequate buffer and the retained Yadon's piperia and forest areas are relatively contiguous. As one example, Yadon's piperia was not found within most of the area proposed for current Hole No. 12; it might be possible to open this area to a golf course hole to reduce the distance to walk or drive between a Hole No. 6 and a Hole No. 7. Given the space, a 9-hole course considered technically feasible in regards to physical space, routing, and operation, while still significantly reducing the loss of forest and Yadon's piperia, although some adjustments in footprint are likely to allow for proper golf course routing.
- **Potential Golf Rounds.** Comment asserts that Founder's Club and NCGA round control would reduce potential rounds to 18,750 for a 9-hole expansion. The DEIR describes that The Founders Club presently has exclusive access to the first hole tees at Spyglass Hill Golf Course for 1.5 hours each weekday (8:30 am to 9:50 am) and 2 hours on weekends/holidays (8:30 am to 10:20 am). This can be conceptually accommodated with a 27-hole operation with proper scheduling. Club members will still be able to use the starting position presently at Hole No. 1 during their exclusive time, while non-club golfers would be able to start at the present Hole No. 10 and then play the new 9-hole expansion without infringing on Founder's Club access. In operation of three 9-hole circuits, golfers proceed from one 9-hole circuit to the next in series. Club members could play the existing 18-hole as a present, while other opportunities would exist for public golfers with the 9-hole expansion that do not exist at present. Comment provides no data why this is not feasible. The DEIR's estimate did account for the 40-days of control by the Founder's Club and NCGA for tournament play. Thus, the DEIR's finding that 24,000 rounds may be possible for a 9-hole expansion is considered a reasonable estimate and needs no revision.
- **Demand for Hotel Rooms.** Comment asserts that a 9-hole expansion will produce less demand for the new hotel rooms included in the Proposed Project. This comment is correct. Assuming that 1 round of golf produces a demand for one night of lodging, the Proposed Project could generate a demand for up to 55,000 room nights. The Proposed

Project includes 160 new visitor-serving units (58 units at the Lodge; 91 units at the Inn; 11 units at Area MNOUV), which could accommodate up to 58,400 room-nights. As noted above, the DEIR finds that 24,000 rounds could be generated from a 9-hole expansion of Spyglass. Thus, a 9-hole alternative can be presumed to generate about 24,000-room night demand; on an annualized basis this corresponds to about 65 visitor-serving units. Alternative 3 included a reduced number of visitor-serving units (76 units) that is closer to this derived demand. Alternative 2 and 3 have been modified (See Chapter 3 of this document) to eliminate the proposed golf cottages, and lower the total number of units at the Lodge and Inn to 65 units, in recognition of the lower derived demand. While this would reduce the revenue the applicant would derive from visitor-serving unit use relative to the Proposed Project, it would also reduce the construction and operational costs proportionally. A reduction in revenue does not make an alternative infeasible under CEQA, provided there is still a reasonable rate of return. The project objectives are still met by a smaller number of visitor-serving units, though perhaps not the revenue goals that applicant may seek (as noted regarding Alternative 3 in the DEIR).

- **Golf Course Potential Revenue.** In order to assess this comment, a conceptual financial review was conducted for the 9-hole expansion. The review was conducted using construction and operational cost estimates provided by the applicant; however these construction and operational cost estimates have not been peer reviewed by a qualified independent financial analysis. Excluding the costs of resource management, the estimated construction costs were identified as approximately \$35 million (including relocation the equestrian center), annual operating revenue between \$4 million (first 10 years) and \$6 million (after 10 years) million and annual operating costs as around \$1.8 million. Based on this review, annual income would be around \$2 million (first 10 years) to \$4 million (after 10 years) and capital costs would be reimbursed within about 16 years. The review discounted the new rounds that would include the new 9-hole circuit at \$200 per round for the first ten years, which is \$75 per round less than that at Spyglass presently. After the first ten years, it was assumed that the new 9-hole circuit (presuming built to a championship quality) would demand the similar greens fees (\$250/round, which is \$25 less than today's greens fees at Spyglass) as the original Spyglass course. This conceptual financial review is only a rough estimate used to evaluate this comment and should not be seen as a specific analysis or determination of actual feasibility. Nevertheless, it supports the concept that a 9-hole expansion is *potentially* economically feasible.

The applicant also submitted a conceptual financial analysis for a stand-alone 9-hole golf course in Area MNOUV that clearly showed that, based on their assumptions, a stand-alone 9-hole course is not economically feasible due to a very slow return on investment and a negative net present value at 30 years. However, Alternative 2 and 3 in the DEIR include a 9-hole expansion that is integrated into a 27-hole Spyglass Hill facility, not a stand-alone 9-hole.

- **Golf Course Revenue and Resource Management Funding.** The applicant asserts that a 9-hole course is in part infeasible because it won't generate enough revenue to conduct resource management. However, the applicant fails to recognize that with a lower amount of forest loss and removal of Yadon's piperia and its habitat, the corresponding need for resource management to offset golf course impacts would also be reduced. A

tangible example of how a 9-hole golf course would offset some of the financial burden on the applicant is Monterey pine forest mitigation. As explained in the DEIR, Chapter 4.4 and in Master Response MR-BIO-5 in Chapter 2 of this document, the mitigation for cumulative impacts is a multiple of the forest lost due to the project. For the Proposed Project, the resultant mitigation is 362 acres, based on a net loss of about 123 acres. If a 9-hole golf course alternative were implemented instead, the loss of forest at the golf course could be about 30 acres less than the Proposed Project, which would reduce the mitigation requirement by about 90 acres, probably at the Aguajito site. This raises the possibility that the applicant may be able to develop or sell an additional 90 acres that would raise substantial revenues. The reduced revenue from a 9-hole golf course is thus not considered to make it infeasible to conduct resource management on a smaller scale.

- **The Golfing Public and Precedent.** The applicant asserts that the golfing public would “refuse” a nine-hole addition to Spyglass because it is one of the top publicly available courses in the world, and that adding holes to a course designed by Robert Trent Jones Jr. would be like adding on to a classical painting. People approach change differently, and no doubt some golfers are likely to have the reaction that the applicant asserts will occur. However, over time what is new can become “classic”. Spyglass is only 38 years old, but it is world-recognized as a top course, yet it is much younger than the nearby Pebble Beach Golf Links and the Cypress Point Golf Club, both of which are also world-renowned golf courses.
- **Environmental Effects and Mitigation.** The applicant asserts that a 9-hole golf course that kept the existing equestrian center in place would have similar effects to the Proposed Project. The Alternatives propose to move the equestrian center, so this comment is moot. Even if the existing equestrian center were kept in place, a 9-hole alternative would still require less space and result in less forest loss than the proposed 18-hole course. This is evident because the proposed golf course places 5 holes in the existing equestrian center and Collins Field, but 13 elsewhere in Area MNOUV. A 9-hole course would have to only put 9 holes on the remaining part of Area MNOUV outside the equestrian center. The applicant also asserts that a 9-hole golf course alternative and/or the other alternative elements in Alternatives 2 and 3 are not necessary to reduce effects of the Proposed Project to a less than significant level. This is correct; however this is not the test that CEQA applies to alternatives analyzed in a DEIR. The 9-hole golf course alternative, and Alternatives 2 and 3 in general would avoid and substantially reduce significant effects of the Proposed Project before mitigation and thus would require less mitigation “effort” to reduce overall impacts to a less than significant level.
- **Project Objectives.** The applicant asserts that Alternatives 2 and 3 negatively affect the overall project objectives. The DEIR acknowledges that Alternative 2 and 3 would not meet all of the project objectives as well as the Proposed Project. In specific, neither of these alternatives would meet the applicant’s specific goal of an 18-hole championship golf course. However, these Alternatives are superior to the Proposed Project in meeting the project objective of protecting natural resources in the Del Monte Forest as they would result in less net loss of natural habitat. CEQA Guidelines Section 15126.6 (a) specifies that alternatives analyzed in an EIR do not need to meet all project objectives equal to the proposed Project, only most of the basic objectives. Further CEQA Guidelines Section 15126.6 (b) states that even though an alternative may “impede to

some degree the attainment of the project objectives or would be more costly” the discussion of alternatives should still consider such alternatives that are capable of avoiding or substantially lessening any significant effects of the proposed project.

69.70 Comment asserts that Alternative 4 would not meet the project objectives because it:

- does not include a golf course;
- does not provide recreational/visitor-serving components;
- does not meet the open space/preservation components because it does not make enough revenue;
- the other elements of Alternative 4 are not necessary to mitigate project effects; and
- would negatively affect the project objectives.

These issues are responded to below

- **No golf course.** As explained in the DEIR, other recreational use in Area MNOUV Alternative 4 would not meet the applicant’s specific goal of an 18-hole golf course, but would meet most of the overall project objectives. Residential or other visitor-serving use in Area MNOUV would not meet the project objective of converting residential use to recreational use at Area MNOUV.
- **Recreational components.** Alternative 4 could partially meet the objective of providing recreational elements through the Spanish Bay Driving Range and in Area MNOUV (if a recreational element were included).
- **Visitor serving components.** Alternative 4 could partially meet the project objective of expanding existing visitor-serving uses in Area MNOUV (if a visitor-serving element were included) along with expansions at the Inn and Lodge. What is uncertain is whether alternative uses for Area MNOUV could generate sufficient demand for potential hotel room units. This is disclosed in the DEIR.
- **Open space/preservation components.** Alternative 4 would include the preservation elements in the proposed project and additional preservation due to a reduce development footprint
- **Environmental effects.** The applicant asserts that the alternative elements in Alternatives 4 are not necessary to reduce effects of the Proposed Project to a less than significant level. This is correct; however this is not the test that CEQA applies to alternatives analyzed in a DEIR. Alternative 4 in general would avoid and substantially reduce significant effects of the Proposed Project before mitigation and thus would require less mitigation “effort” to reduce overall impacts to a less than significant level.
- **Project Objectives.** The DEIR identifies that Alternative 4 would meet some, but not all of the project objectives and is physically feasible, but is of questionable economic feasibility for the alternative uses at Area MNOUV (see Table 5.0-2 and P. 5.0-23 to 5.0-24). While Alternative 4 does not meet all project objectives and certain elements are of uncertain feasibility, other elements, such as consolidation of employee housing in the Corporate Yard, or further clustering of residential development would not create any conflict with project objectives and are feasible. CEQA Guidelines Section 15126.6 (a)



specifies that alternatives analyzed in an EIR do not need to meet all project objectives equal to the proposed Project, only most of the basic objectives. Further CEQA Guidelines Section 15126.6 (b) states that even though an alternative may “impede to some degree the attainment of the project objectives or would be more costly” the discussion of alternatives should still consider such alternatives that are capable of avoiding or substantially lessening any significant effects of the proposed project.

- 69.71 Comment asserts that the DEIR Alternatives are all infeasible and therefore the Proposed Project is the Environmentally Superior Alternative and should be identified as such in the DEIR. Comment identifies aspects of the Proposed Project that are improved from the previously proposed project as evidence to support this claim.

As noted above, Alternatives 2 and 3 are considered feasible and considered to meet most of the project objectives. Alternative 4 fails to meet some of the project objectives and has elements of questionable feasibility.

As identified in the DEIR, the No Project Alternative is considered the Environmentally Superior Alternative and Alternative 2 is considered the Environmentally Superior Alternative among the action alternatives.

CEQA requires identification of the Environmentally Superior Alternative from the alternatives to a proposed project. If there are no feasible alternatives, then there is no Environmentally Superior Alternative. The project cannot be an alternative to itself.

As to whether the Proposed Project is environmentally superior to the previously proposed project, the comment is correct as the current Proposed Project incorporates elements of the environmentally superior alternative identified in the previous uncertified EIR. In specific, as identified in the DEIR, the Proposed Project would result in less forest loss overall and more preservation than either of the previously proposed Pebble Beach projects that sought to buildout a portion of its lands within the Del Monte Forest.

However, this prior identification is irrelevant to the current CEQA document because CEQA requires analysis of alternatives for the current Proposed Project, not a previous project that is not currently proposed.

No revisions to the DEIR are warranted.

- 69.72 Comment asserts that the description of the No Project Alternative should note that up to 41 single-family residences could be built on the 41 lots that are within the Proposed Project Area.

CEQA requires that the “reasonably foreseeable” conditions be evaluated for the No Project. As described in the DEIR, it is reasonably foreseeable that single-family residential development may be later proposed in the event that the Proposed Project is not approved.

The text has been revised to note the number of legal lots present within the Proposed Project and the theoretical possibility that a single-family residence might be developed on each of these lots under the No Project Alternative.

- 69.73 Please see Master Response for Land Use MR-LU-3 Policy Consistency in Chapter 2.  
69.74 Please see Master Response for Land Use MR-LU-3 Policy Consistency in Chapter 2.  
69.75 Please see Master Response for Land Use MR-LU-3 Policy Consistency in Chapter 2.

- 69.76 This comment addresses Yadon's piperia. Subsequent to the DEIR public review period and based in part on comments received on the DEIR, the analysis regarding Yadon's piperia was revised and recirculated in the PRDEIR in September 2004. Comments related to the revised piperia analysis in the PRDEIR are addressed in Master Response for Biological Resources in MR-BIO-6 in Chapter 2.
- 69.77 Please see Master Response for Biological Resources MR-BIO-3 Wetlands in Chapter 2.
- 69.78 Comment asserts that Monterey manzanita is not known to occur in DMF. Comment is correct. Monterey manzanita is a former synonym for Hooker's manzanita (*Arctostaphylos hookeri* ssp. *hookeri*), but presently refers to a separate species (*Arctostaphylos Montereyensis*) that is not known to be present in the Del Monte Forest. Errata changes have been made to the text as shown in Chapter 3.