

Introduction

Introduction

This section includes the following:

- a description of CEQA requirements for recirculation and revision of a portion of a Draft EIR;
- review of issues raised in comments received on the Draft EIR that trigger partial EIR revision and recirculation; and
- a summary of revisions made to the February 2004 Pebble Beach Company's Del Monte Forest Preservation and Development Plan Draft EIR for certain subjects.

PRDEIR Review and Final EIR Process

This Partial Revision of the Draft EIR (PRDEIR) is being circulated for public comment on the new and/or revised analyses of the subjects addressed in this document. Upon completion of the public review period, a Final EIR will be prepared that includes responses to comments received on this PRDEIR and on the Draft EIR, except for those comments on the Draft EIR that address topics discussed in this PRDEIR.

As allowed by CEQA Guidelines Section 15088, comments received on the Draft EIR related to the topics addressed in this PRDEIR are part of the administrative record and have been considered when preparing this PRDEIR. However, these previously received comments will not be responded to in the Final EIR related to the topics in this PRDEIR; only comments received on this PRDEIR that address the topics included in this PRDEIR will be included and responded to in the Final EIR.

The County will be responding in writing to comments submitted on the February 2004 Draft EIR related to the analysis of all other subject areas covered in the Draft EIR (e.g. issues other than the PRDEIR subjects) in the Final EIR for this project.

ENVIRONMENTAL REVIEW PROCESS:

Application Deemed Complete	December 19, 2001
Initial Study/Notice of Preparation	February 20, 2002
Public Scoping Meeting	September 25, 2002
EIR Public Information Meeting:	February 11, 2004
Field Trip	February 18, 2004
DEIR Public Review Period	February 5 – March 22, 2004
PRDEIR Public Review Period	September-October 2004

PERMIT REVIEW PROCESS:

Del Monte Forest Land Use Advisory Committee	
Project Review & Recommendations	March 11, 2004
Subdivision Committee	
Project Review & Continuation	April 8 & 29, 2004
Subdivision Committee	
Continued Project Review & Recommendation	est. November 2004
Planning Commission	
EIR & Project Review & Recommendations	est. January 2005
Board of Supervisors	
Consider EIR Certification,	
Decision on Project Applications, & Adoption of MMRP	To Be Determined
California Coastal Commission: Consider LCP Amendment	
Certification for Measure A changes	To Be Determined

CEQA Requirements

Relevant portions of CEQA Guidelines Section 15088.5 for this PRDEIR are as follows:

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.

"Significant new information" requiring recirculation include, for example, a disclosure showing that:

1 *(1) A new significant environmental impact would result from the project or from*
2 *a new mitigation measure proposed to be implemented.*

3 *(2) A substantial increase in the severity of an environmental impact would result*
4 *unless mitigation measures are adopted that reduce the impact to a level of*
5 *insignificance.*

6 *(3) A feasible project alternative or mitigation measure considerably different*
7 *from others previously analyzed would clearly lessen the environmental impacts*
8 *of the project, but the project's proponents decline to adopt it.*

9 *(b) Recirculation is not required where the new information added to the EIR*
10 *merely clarifies or amplifies or makes insignificant modifications in an adequate*
11 *EIR.*

12 *(c) If the revision is limited to a few chapters or portions of the EIR, the lead*
13 *agency need only recirculate the chapters or portions that have been modified.*

14 *(f)(2) When the EIR is revised only in part and the lead agency is recirculating*
15 *only the revised chapters or portions of the EIR, the lead agency may request*
16 *that reviewers limit their comments to the revised chapters or portions. The lead*
17 *agency need only respond to (i) comments received during the initial circulation*
18 *period that relate to chapters or portions of the document that were not revised*
19 *and recirculated, and (ii) comments received during the recirculation period that*
20 *relate to the chapters or portions of the earlier EIR that were revised and*
21 *recirculated. The lead agency's request that reviewers limit the scope of their*
22 *comments shall be included either within the text of the revised EIR or by an*
23 *attachment to the revised EIR.*

24 *(g) When recirculating a revised EIR, either in whole or in part, the lead agency*
25 *shall, in the revised EIR or by an attachment to the revised EIR, summarize the*
26 *revisions made to the previously circulated draft EIR.*

27 **Issues Requiring Draft EIR Revision and** 28 **Recirculation**

29 The Proposed Project was analyzed in a Draft EIR in February 2004 that was
30 circulated to local, state, and federal agencies and made available to the public
31 for a 45-day public comments period between February 2, 2004 and March 22,
32 2004. A total of 77 comment letters were received within the comment period.
33 An additional 35 comment letters on the Draft EIR have been received after the
34 comment period. Multiple submissions of identical comment letters are treated
35 as single comment letters.

36 Monterey County Planning and Building Inspection Department (County)
37 evaluated the issues raised in these comments on the Draft EIR. After analysis of
38 the issues raised in comment, the County determined that a revision and

recirculation of certain revised portions of the Draft EIR was warranted. These portions include the analysis of the following subjects:

- water supply and demand;
- Yadon's piperia;
- increased equestrian use of the existing Green Trail between HHNA and Spanish Bay; and
- traffic on regional Monterey County highways;
- growth-inducement effects of a new mitigation measure for impacts related to water supply and demand; and
- cumulative impacts related to water supply and demand, Yadon's piperia, and traffic on regional Monterey County highways.

In addition, the County has revised one of the significance criteria for long-term noise to make it more consistent with County noise standards, and thus a portion of the Draft EIR noise chapter regarding long-term noise impacts has been revised and is also recirculated in this document.

The County is circulating and making this PRDEIR available to solicit comments on the revised analyses of the subjects analyzed in this document. The County will respond to written comments submitted regarding the PRDEIR in the Final EIR for this project. Comments submitted in response to circulation of the PRDEIR on subjects not analyzed in the PRDEIR will be considered, but written responses will not be prepared for those comments.

Summary of Revisions to the Draft EIR

The revised and additional analyses for the subjects outlined above have resulted in the addition of new significant impacts (water supply, the Green Trail, and regional traffic) and new mitigation; a revision of mitigation measures for two impacts (Yadon's piperia and long term noise); and the addition and/or revision of other Draft EIR text. The discussion below summarizes the changes for each section. Table INT-1 summarize the revisions to the Draft EIR text.

- **Water Supply and Demand.** In Chapter P1 of this document, the analysis of project water demand in the Draft EIR has been updated to assess conditions representative of wet, average, drier than average, and very dry conditions. A current baseline (defined as existing patterns of water use through Water Year 2003) which includes the existing Recycled Water Plant is now used to assess project impacts. This PRDEIR identifies project-related net increases in withdrawals from the Carmel River and the Seaside aquifers which is determined to be a significant water supply impact and a significant impact on the biological resources of the Carmel River. Mitigation for these impacts is identified as funding of the Recycled Water Plant (RWP) Phase II Improvements, operation of RWP Phase II prior to use of potable or recycled water for the Proposed Project, and prohibition of the

1 use of potable water for project irrigation except in the event of a RWP
2 interruption. The PRDEIR also analyzes and discloses the secondary
3 physical impacts of the RWP Phase II Improvements.

- 4 ■ **Yadon's piperia.** In Chapter P2 of this document, the results of new 2004
5 surveys for this species are presented and the analysis updated using the
6 results. The analysis of indirect effects has been expanded and the area of
7 indirect effects has been identified. The prior mitigation suite has been
8 changed as follows: the applicant's realignment of Stevenson Drive has been
9 altered to reduce its impact and thus the realignment of Stevenson Drive
10 traffic onto Bristol Court has been deleted; realignment of golf course holes
11 has been deleted; transplantation is now limited to Area MNOUV only;
12 enhancement requirements have been expanded to additional locations;
13 preservation requirements have been expanded to include additional piperia
14 locations within the Aguajito parcels owned by the applicant; and success
15 criteria for transplantation and enhancement have been refined. The
16 conclusion of the Draft EIR that the project impacts to Yadon's piperia can
17 be mitigated to a less than significant has not changed, though the analysis
18 and the mitigation have been changed as presented in this document.
- 19 ■ **Green Trail.** In Chapter P3 of this document, the impact of increased
20 equestrian and pedestrian traffic on biological resources along the Green
21 Trail between HHNA and Spanish Bay is analyzed as it was not addressed in
22 the Draft EIR. Impacts are assessed and mitigation has been added to
23 address significant impacts identified to two wetland locations. Existing
24 mitigation identified in the Draft EIR for indirect effects on biological
25 resources and water quality has been extended in geographic scope to include
26 this portion of the Green Trail.
- 27 ■ **Traffic and Circulation.** In Chapter P4 of this document, the project's
28 impact on regional Monterey County highways is analyzed. The Draft EIR
29 analyzed the project's impact on traffic within the Del Monte Forest and
30 along the adjacent portions of the Holman Highway/68 (between Highway 1
31 and Pacific Grove) and Highway 1 (from Holman Highway/68 to the Carmel
32 River Bridge). The impact of adding project traffic to other regional
33 Monterey County highways (Highway 1 outside of Carmel, Highway 68
34 between Monterey and Salinas, Highway 101, and Highway 156) was not
35 analyzed in the Draft EIR, but is analyzed in this PRDEIR. The conclusion
36 of the additional analysis is that project impacts to these regional highways in
37 Monterey County are significant along certain highway segments.
38 Mitigation is identified in this PRDEIR as fair-share contributions to
39 proposed roadway improvements along Highways 1, 68, 101, and 156 that
40 would reduce this impact and cumulative contribution to a less than
41 significant level.
- 42 ■ **Long-Term Noise.** In Chapter P5, the analysis of long-term noise impacts
43 was updated per a County change in the significance criteria. The County
44 has not identified any substantial issues or revisions related to comments on
45 the Draft EIR analysis of noise that warrant recirculation. Comments on the
46 Draft EIR noise chapter will be addressed in the FEIR. Separate from
47 comments on the Draft EIR, the County decided to change the significance
48 criteria for long-term noise to make it more consistent with County General

Plan noise standards. In the Draft EIR, the criteria identified a significant long-term noise impact as an increase in project-related noise of 5 dBA or greater, regardless of the absolute noise level. The PRDEIR eliminates the 5 DBA increase criteria where the resultant absolute noise level with project is 55 dBA or less, because the County General Plan has determined that noise levels less than 55 dBA are suitable for all residential noise-sensitive uses. Impacts related to long-term noise were re-evaluated with the revised significance criteria. The significance level of long-term noise impacts identified in the Draft EIR did not change, but the performance standard for the mitigation for impact related to new ventilation fans at the Inn at Spanish Bay and the Lodge at Pebble Beach was changed to 55 dBA. In addition, the mitigation proposed for Yadon's piperia in the Draft EIR to route Stevenson Drive traffic onto Bristol Curve has been removed from the suite of mitigation, and thus potential traffic noise impacts of this prior mitigation do not require further analysis. The applicant's revised Stevenson Drive realignment is analyzed in this document and traffic noise impacts are found to be less than significant.

- **Growth-Inducement.** In Chapter P6 of this document, a supplemental analysis of growth-inducement is presented related to the proposed Recycled Water Project Phase II financing via sale and conveyance of up to 175 AF of the applicant's water entitlement for residential use in the Del Monte Forest. This document identified the RWP Project Phase II Improvements as mitigation for project water supply and demand impacts and thus the analysis in the Draft EIR was expanded to examine the growth-inducement effects of the financing mechanism. The financing mechanism is found to be growth-inducing, because it will remove an existing constraint to growth, namely water availability. This induced growth is found to be growth-accommodating because it would be residential growth within the Del Monte Forest in accordance with the Del Monte Forest Local Coastal Plan policies, designations, and buildout potential.

- **Cumulative Impacts.** In Chapter P7 of this document, the cumulative analysis in the Draft EIR has been revised in regards to water supply and demand, Yadon's piperia, and traffic on regional highways. The new mitigation identified for direct project impacts on water supply and demand and Yadon's piperia would also address the project's cumulative contributions. New mitigation is identified related to project cumulative contributions to traffic on regional highways. The cumulative analysis of long-term noise was examined in relation to the County-revised significance criteria, but no resultant change in the analysis in the Draft EIR was warranted.

TABLE INT-1. SUMMARY OF CHANGES TO DRAFT EIR		
DEIR (PRDEIR) Text	New or Expanded Text is Added to DEIR	DEIR Text Replaced by PRDEIR
(PRDEIR Introduction)		
	Adds Introduction to PRDEIR	
Executive Summary (PRDEIR Executive Summary)		
Areas of Known Controversy	Adds new text to ESHA discussion on page ES-13 Adds new text to Traffic discussion on pages ES-17 & 18	Replaces discussion of Yadon's piperia on pages ES-13 & 14 Replaces discussion of Water Supply on pages ES-16 & 17
Summary of Impacts and Mitigation Measures	Adds new impact BIO-A6 (Green Trail) Adds new impact BIO-Carmel River-1 Adds new impact PSU-RWPP2-1 Adds new impact TC-B3 Expands text of impact NOISE-A1	Replaces Impact BIO-D1 and D1(C) and associated mitigation Replaces Impact PSU-D1 and D1(C) and associated mitigation Replaces Impact PSU-E1 and E2 and associated mitigation Replaces Mitigation NOISE -A1
3.3 Biological Resources (PRDEIR Chapters P1 re: Carmel River, P2 re: Yadon's Piperia, and P3 re: Green Trail)		
Summary of Project Impacts	Adds new impact BIO-A6 under subsection A on page 3.3-2 related to the Green Trail.	
Relevant Project Characteristics	Adds new text on page 3.3-3 regarding Green Trail Adds text describing revised Stevenson Drive realignment.	
Project Impacts & Mitigation Measures	Adds new Impact BIO-A6 (regarding equestrian use of the existing Green Trail) under subsection A on page 3.3-17 before the subsection B discussion. Adds new Impact BIO-Carmel River-1 regarding impacts to Carmel River due to water withdrawals. New mitigation identified as part of analysis of Water Supply and Demand.	Replaces Impact BIO-D1 (Yadon's piperia) discussion on pages 3.3-31 to page 3.3-37 Replaces Mitigation Measure BIO-D1-1 through D1-4 (Yadon's piperia) discussion on pages 3.3-37 to page 3.3-41
Environmental Setting	Adds new setting information regarding the existing Green Trail and the Carmel River. Adds new text related to 2004 surveys for Yadon's piperia and revised estimates of occurrence areas and population size.	

TABLE INT-1. SUMMARY OF CHANGES TO DRAFT EIR		
DEIR (PRDEIR) Text	New or Expanded Text is Added to DEIR	DEIR Text Replaced by PRDEIR
3.5-D Public Services (PRDEIR Chapter P1 re: Water Supply and Demand)		
Summary of Project Impacts	Adds new impact related to water supply and demand.	Replaces Lines D and E on pages 3.5-1 and 3.5.
Relevant Project Characteristics	Expands text on page 3.5-2, lines 3-10 and adds summary of RWP Phase II Improvements	
Impacts & Mitigation Measures	Adds New Mitigation PSU-D1, D2, and D3.	Replaces Impact PSU-1 (Section D- Water Demand) on pages 3.5-10 through page 3.5-14, including Figure 3.5-1 Replaces Impact PSU-2 (Section E-Infrastructure Capacities Impact Analysis) on pages 3.5-15 to page 3.5-16
	Adds New Impact PSU-RWPP2-1to Section D and before Section E on page 3.5-15 that summarizes secondary impacts of planned RWP Phase II Improvements	
Environmental Setting	Adds setting for RWP Phase II Improvements	Replaces Text on Water Supply and Distribution text on pages 3.5-24 to page 3.5-29
3.7 Transportation and Circulation (PRDEIR Chapter P4 re: Impacts on Regional Highways)		
Relevant Project Characteristics		Replaces text on page 3.7-4 (Lines 18-24) regarding proposed realignment of Stevenson Drive.
Impacts and Mitigation Measures	Adds new Impact TC-B3 and mitigation TC-B3 regarding project traffic impacts upon County regional highways.	Revises Criteria of Significance B on 3.7-18 to include regional road segments.
Environmental Setting	Adds new text regarding Bristol Curve.	
3.9 Noise (PRDEIR Chapter P5 re: Long-Term Noise)		
Relevant Project Characteristics	Adds new text on page 3.9-4 regarding proposed realignment of Stevenson Drive.	
Impacts & Mitigation Measures		Revises Criteria of Significance A on 3.9-4 regarding long-term noise increases.
	Adds new Impact discussion regarding realignment of Stevenson Drive and traffic noise impacts on Bristol Curve.	Replaces impact analysis of ventilation noise and Mitigation Measure NOISE-A1 on pages 3.9-9 and 3.9-10.

TABLE INT-1. SUMMARY OF CHANGES TO DRAFT EIR		
DEIR (PRDEIR) Text	New or Expanded Text is Added to DEIR	DEIR Text Replaced by PRDEIR
Environmental Setting	Adds new text regarding Bristol Curve.	
4.3 Growth Inducing Impacts (PRDEIR Chapter P6: re Growth Inducement for RWP Phase II financing)		
	Adds new text to page 4.3-3 that summarizes growth-inducing effects related to the potential sale and conveyance of up to 175 AF of the applicant's entitlement as the financing mechanism for the Recycled Wastewater Treatment Plant Phase II improvements.	
4.4 Cumulative Impacts (PRDEIR Chapter P7 re: Cumulative Impacts for Water Supply and Demand, Yadon's piperia, and Regional Traffic)		
Summary of Impacts	Adds Impact BIO-Carmel River-1 to Biological Resources Adds Line B3 to Transportation and Circulation	Replaces Biological Resources Line D1, Public Services and Utilities Line D1, and Noise Line A1
Biological Resources		Replaces Yadon's Piperia Cumulative Impact Analysis (Section D) on pages 4.4-18 to page 4.4-19.
Public Services		Replaces Water Demand Cumulative Impact Analysis (Section D) on pages 4.4-33 to page 4.4-41.
Transportation and Circulation	Adds new Impact TC-B3 on page 4.4-51 regarding cumulative impacts on regional highways and mitigation TC-B3	
Long-Term Noise	Adds new text on page 4.4-56 regarding traffic noise on Bristol Curve Updates text on page 4.4-56 regarding ventilator fans	
6 Report Preparation (PRDEIR Chapter P8 List of Preparers)		
List of Preparers	Adds PRDEIR preparers	
7 References (PRDEIR Chapter P9 References)		
Biological Resources	Adds new references relevant to Yadon's piperia, Green Trail, and Carmel River.	
Public Services and Utilities	Adds new references for water supply and demand and Recycled Water Plant Phase II	
Transportation and	Adds new references for regional Monterey County highway	

TABLE INT-1. SUMMARY OF CHANGES TO DRAFT EIR		
DEIR (PRDEIR) Text	New or Expanded Text is Added to DEIR	DEIR Text Replaced by PRDEIR
Circulation	traffic	
Noise	Adds new reference for Bristol Curve traffic noise	
Growth Inducement	Adds new references for growth-inducement analysis	
Cumulative Impacts	Adds new references for Biological Resources, Water Supply and Demand, Transportation and Circulation, and Noise	
Appendix B (PRDEIR Appendix B.5 and B.6)		
Traffic	Adds new Appendix B.5 (Monterey County Regional Highways) Adds new Appendix B.6 (Traffic Data for Bristol Curve)	
Appendix E (PRDEIR Appendix E.3, E.4, and E.5)		
Biological Resources	Adds new Appendix E.3 (resource figures for Yadon's piperia and results of 2004 surveys) Adds new Appendix E.4 (special status species lists for the Del Monte Forest) Adds new Appendix E.5 (preservation areas outside the Del Monte Forest)	
Appendix F (PRDEIR Appendix F)		
Roadway Improvements	Adds new figure showing revised Stevenson Drive realignment	
Appendix G (PRDEIR Appendix G)		
Potable and Recycled Water Demand		Replaces Entire Appendix
Appendix I (PRDEIR Appendix I)		
Draft TEAM Plan	Adds updates to TEAM plan for use in preparation of Final Piperia Plan	
(PRDEIR Appendix J)		
	Adds new Appendix J (Bristol Curve Noise Study)	

TABLE INT-1. SUMMARY OF CHANGES TO DRAFT EIR		
DEIR (PRDEIR) Text	New or Expanded Text is Added to DEIR	DEIR Text Replaced by PRDEIR
(PRDEIR Appendix K)		
	Adds new Appendix K (RWP Phase II environmental documents	