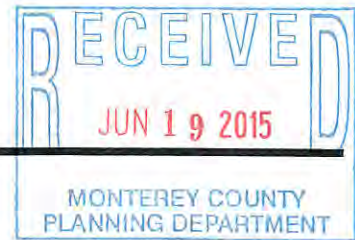


PEBBLE BEACH INCLUSIONARY HOUSING
(PLN130447)
COMMENTS TO DEIR (M – Z)

- Mantovani, Elinora – June 19, 2015
- Mason, Lynn – June 22, 2015
- Mathews, Peter – June 15, 2015
- Mathews, Peter – June 16, 2015
- McCarthy, Carol – June 8, 2015
- Midgley, Judy – June 16, 2015
- Monterey County Sheriff's Office (Donna Galletti) – June 19, 2015
- Monterey-Salinas Transit (Hunter Harvath) – June 19, 2015
- Nichols, Noelle – June 22, 2015
- O'Brien E.J. – June 18, 2015
- The Old Forest Group (Cam Schure) – June 18, 2015
- Pampuro, Janet Struve – June 15, 2015
- Pariser, Hana – May 29, 2015
- Parsons, Nancy Ponedel – June 11, 2015
- Rubin, Elliot – June 17, 2015
- Schrader, Ann – June 17, 2015
- Schure, Cam – May 26, 2015
- Shaffer, Gloria – June 18, 2015
- Souza, Grace – June 19, 2015
- State of California Clearinghouse – June 22, 2015
- Stevens, Joyce – June 17, 2015
- Van Horn, Dana – June 19, 2015
- Vriend, Dorothy – June 15, 2015
- Villezcas, Mercedes – June 19, 2015
- Weatherbee, Stormy G. – June 11, 2015
- Widenmann, Thaleia – June 1, 2015
- Widenmann, Thaleia – June 15, 2015
- Widenmann, Thaleia – June 15, 2015
- Wittwer/Parkin LLP (representing Del Monte Neighbors United) – June 19, 2015
- Zeigler, Jan Penney – June 24, 2015
- Zimmerman, Greg – May 6, 2015

Gonzales, Eva x5186



From: Elinora Mantovani [emantovani1964@gmail.com]
Sent: Friday, June 19, 2015 12:30 PM
To: ceqacomments
Cc: Sidor, Joe (Joseph) x5262
Subject: Comments on Draft EIR -- PLN130447 -- Area D, Del Monte Forest, Inclusionary Housing Project -- Pebble Beach Company

Ladies and Gentlemen:

Set forth below are my comments on the above-referenced Draft EIR.

Per the Notice of Availability, here is my information:

Name: Elinora Mantovani
Mailing address: 1336 Miles Avenue, Pacific Grove, CA 93950
Email: emantovani1964@gmail.com
Phone: [408-425-3898](tel:408-425-3898)

Thank you for your consideration.

Very truly yours,

Elinora Mantovani

COMMENTS:

Executive Summary -- Many of the statements here are conclusory and slanted; details in the various section comments, below.

ES-7 - ES-8, Table ES-2: In the section of the table on page ES-8 regarding various alternatives dismissed because the properties are not owned by the Pebble Beach Company ("PBC"), this is not a valid ground for dismissal, as it is feasible for the PBC to purchase said sites. Although PBC may not want to purchase sites, that is not enough to render these alternatives not feasible. Further, dismissing distributed housing because specific sites were not identified is not enough to serve as the basis for dismissal; the consultant could have picked sample properties as examples. In addition, the City of Pacific Grove has offered at least two properties within the City limits as available for construction of affordable housing. These alternatives should be considered. Also, the possibility of asking the County for a variance of Section 18.40.080 of the Inclusionary Housing Ordinance should have been considered, rather than dismissed out of hand.

ES-9: The repeated references to the potential build-out of Area D with market-rate housing are erroneous, as Area D is, pursuant to the express provisions of the 2012 planning approvals (for PBC's "final build out" of the Del Monte Forest properties). That approval expressly applied to all remaining undeveloped properties owned by PBC in the Del Monte Forest. Area D was, at the time, owned by PBC, was undeveloped, and is in the Del Monte Forest. Therefore, the potential development of Area D with market rate housing is not permitted. Additionally, the alleged potential building out of Area D with market rate housing is also not permitted under CEQA guidelines. The Draft EIR should also offer the legal basis for any development in Area D, including the proposed inclusionary housing project, based on the express provisions of the 2012 project approvals, including but not limited to the Board of Supervisors resolution 12-149, as amended by Resolution 14-024.

Chapter 1 - Introduction

1-5, Line 9: Please clarify "growth inducement" to indicate what it is that may be induced to grow.

Chapter 2- Project Description

2-3, Lines 29-30: With regard to the existing fencing, the report should be amended to clarify that these fences are owned by adjacent landowners (i.e., not owned by PBC).

2-4, Line 22, et seq. -- Re "Tree Removal and Landscaping" -- the report should be amended to clarify that the trees noted to be removed are those trees over a certain diameter at a specific height above the ground. This section should be amended to so indicate, and to set forth the total number of trees, of all descriptions, that will be removed. A reference to the Arborist Report in Appendix B is not sufficient, as the main body of the report should give readers all material facts.

2-6, Lines 20-22: The report should be amended to state whether or not the referenced bike ramp and jumps were constructed by PBC, by third parties acting on behalf of and at the request of PBC, or by unknown third parties with (or without) the knowledge and/or consent of PBC.

2.7, Lines 3-8: The report should be clarified to make it clear that Condition No. 143 expressly provided with a certain time frame, and within the Greater Monterey Peninsula Planning Area, in order to present all material facts to readers. The report also erroneously states a conclusion that obviates the true impact of the proposed project; i.e., that dedication of the Old Capitol site, with preservation of Monterey pine forest somehow mitigates the destruction of a material portion of the Area D forest, when there is no evidence whatsoever that the Old Capitol site would be developed in any event.

Chapter 3 - Environmental Setting, Impacts, and Mitigation Measures

Section 3.1 - Aesthetics

3.1-1, Table 3.1-1, Line 14: With regard to Impact B ("Visual Character"), I disagree with the conclusion that the proposed mitigation (AES-B1) would render the degradation of the visual character of the Project Site to "less than significant". Please provide a full, factual justification for this conclusion.

3.1-1, Table 3.1-1, Line 14: With regard to Impact C ("Light and Glare"), I disagree that the significance before mitigation is "Less than Significant"; that is certainly not the case with regard to the impact on adjacent residences. Please provide a full, factual justification for this designation.

3.1-4, Project Site Visual Character, Lines 13, et seq.: This section is inadequate, as there are no photographs or simulations taken from the viewpoint of adjacent residences, which would show the true impact of the proposed project. The report should be amended to include photos and simulations from the adjacent residences. The impact of the proposed project on the adjacent residences is a material issue that must be included in the Report.

3.1-9, Lines 23-28: As noted above, there is no inclusion in the Report of potential view disruption from the adjacent residences. This is a material omission, and the report should be amended to include photos, simulations and all relevant information about the impact on the viewshed from the adjacent residences if the proposed project is constructed as planned.

3.1-12, Lines 18-29: The statement that the views of the project (when constructed as planned) would be "mostly obscured" from adjacent neighborhoods, assumes facts not in evidence. Likewise, the conclusion in the last sentence of this paragraph (lines 26-28) that the proposed visual buffering would result in a "less than

significant visual aesthetic impact" is not supported by the report contents. The report should be amended to include additional information regarding the likely impact of the project on the viewshed from the adjacent residences. Also, it should be made clear who it is that is making the judgment regarding the aesthetic impact. As currently drafted, this portion of the report is deficient.

3.1-13, Lines 1, et seq. (re Mitigation Measure AES-B1): This mitigation measure only refers to views from adjacent roadways, and does not address visual impact on the viewshed from the adjacent residences. The report must be amended to address this impact.

3.1-13, Lines 34, et seq. ("Light and Glare"): Line 38 states that "nighttime lighting wouldnot be required during construction." The report should be clarified to address any security lighting that may be installed around the construction site, that would be activated during the nighttime areas, or the report should clearly state that no nighttime security lighting will be used at the Project Site during construction.

3.1-14: The conclusion at line 25, that the impact of light and glare would be "less than significant" is not supported by a full analysis. The report does not address the cumulative impact of 24 units on a small site, with ground-level and second-storey lighting (interior and exterior), on the adjacent residences. This is a material omission. The report should be amended to include this analysis. I believe that the analysis would not support a finding of "less than significant" on the adjacent residences.

Section 3.2 - Air Quality

3.2-18, Section E, "Odors" (line 18 et seq.): The report fails to discuss the impact of objectionable odors generated by the operation of the project, in terms of cooking, maintenance, etc., considering the high-density characteristic of the Project. Since the adjacent residences could be considered sensitive receptors, this factor should be addressed in the Report. I believe this section, as written, is defective in that this was not considered, and that the conclusion at the end of the section, on page 3.2-19, at Line 10, is incorrect.

Section 3.3 - Biological Resources

3.3-1, Table 3.3-1, Line 23: With regard to Impact A (Sensitive Habitats), the proposed mitigation does not reduce the significance to "Less than significant"; agreeing not to destroy yet more forest resources does not mitigate the destruction of the forest resources that would be removed to allow construction of the Project.

3.3-8, Lines 1-11 (California Endangered Species Act) -- Please amend the report to provide the basis for the statement in the last sentence of this section (lines 9-11) that there are no "rare", "threatened" or "endangered" species with potential to occur in areas affected by the Project.

3.3-20, Lines 16, et seq. ("Project Impacts and Mitigation Measures; Sensitive Habitats") -- The statement at lines 22-23, characterizing open space preservation as an "offset" is misleading; there is no evidence that existing forest designated for preservation in any way offsets the destruction of other existing forest resources.

3.3-20, Line 31: Please amend the report to provide the factual basis for the statement that the open space preservation areas could be impacted by "increased pollutants from cats, dogs, yard waste, and trash."

3.3-20, Line 33: Please amend the report to provide the factual basis for the statement that the open space preservation areas could be impacted by "fragmentation of remnant stands". Also please define the phrase "remnant stands", so that readers of the report can understand the point of this comment.

3.3-20, Line 34: Please amend the report to provide the factual basis for the statement that the open space preservation areas could be impacted by "increased susceptibility to insects and diseases, including pitch canker for Monterey pine."

3.3-21, Lines 1-5: Please amend the report to explain why this paragraph has anything to do with the Project.

3.3-21, Lines 11-17: Please amend the report to explain the factual basis for the statement in the first sentence of this paragraph (lines 11-12), that "In concept, the direct and indirect effects of the Project could be mitigated through habitat preservation of 10.5 acres on the Project site." How is preservation of existing forest habitat, with no indication that such habitat would ever be destroyed, a mitigation for destruction of existing forest habitat? Further, please amend the report to provide an explanation of how the PBC's failure to maintain the affected forest area that would be removed as part of the construction of the Project, which purportedly led to degradation of the forest, would serve as the basis for supporting construction of the Project.

3.3-21, Lines 18-23: Please amend the report to support the conclusion that implementation of Mitigation Measures BIO-A1 and BIO-A2 would reduce the impact of degradation. As stated previously, promising not to destroy additional resources should not and cannot be deemed a mitigation for the destruction of existing forest resources.

3.3-21, Lines 23-33: Please amend the report to support the conclusion that dedication of the Old Capitol Site would in any way mitigate destruction of existing forest resources, particularly the impact of that destruction on the adjacent residences, roadways and neighborhoods. Further, please amend the report to state who is making the determination that on-site preservation and management "is considered adequate" to reduce Project impacts "to a less than significant level", and the basis for that determination.

3.3-33, Lines 5, et seq. ("Tree Removal"): The report should be amended to provide a factual basis for the assertion at lines 25-27 that dedication of existing forest resources (in essence, a promise not to destroy existing forest resources) is in any way a mitigation for destruction of other forest resources.

3.3-34, Line 10: Please amend the report to clarify what "other areas" are; specify such areas.

Section 3.4 - Climate Change

3.4-23, Lines 22-23: This is a sentence fragment; please amend to provide the full statement that provides the basis for the subsequent sentences.

Section 3.5 - Cultural Resources

No comments.

Section 3.6 - Geology, Seismicity, and Soils

3.6-10, Table 3.6-3 (Line 18): There is an asterisk on the far right column for the Cypress Point fault, but no corresponding footnote; please amend to delete asterisk or provide the appropriate footnote.

3.6-16, lines 8-10: The report should be amended to discuss the impact of hazardous materials generated by the normal operation of the Project, including but not limited to maintenance activities, as well as activities by residents (e.g., hazardous materials used by the residents to maintain vehicles in the carport and parking areas). The discussion should take into account the high-density massing of the project residences and parking areas.

Section 3.7 - Hydrology and Water Quality

3.7-1, Table 3.7-1: With respect to impact HYD-C1, the report did not take into account the amount of runoff at the end of Miles Avenue, into the Project site, during times of heavy rainfall. The runoff has damaged existing pavement, and goes right into the Project site. The potential increased impervious surface of the project would increase the potential impact of back-up and flow into the adjoining properties. Please amend the report to address this, and the impact of the construction on the adjacent properties. I believe the "less than significant" impact before mitigation is incorrect.

Section 3.8 - Land Use and Recreation

3.8-7, lines 25, et seq.: I believe the estimate of 78 new residents of the Project is low; I recommend that the report be amended to more clearly state that these are the consultant's assumptions only, and that the actual numbers could vary (and vary significantly).

3.8-9, Lines 14-15: I believe the statement that the project would be "physically and visually separated from the Del Monte Park neighborhood by a forested buffer" is not supported by any information presented in the report. There may be some landscaping, but not a "forested buffer". Please provide detailed factual support for this statement.

3.8-9, Lines 25-26: Please clarify the statement that "the new multi-family buildings would be separate and apart." [Emphasis added] Separate and apart from what?

3.8-9, line 21: Please clarify the factual basis for the statement that the Project would add "a small amount" of residential traffic, noise, and light to the adjacent Del Monte Park neighborhood. The adjacent homeowners and residents of the adjacent neighborhoods do not agree. Therefore, the report must be amended to support this conclusory statement.

3.8-9, Lines 22-23: The fact that the additional traffic, noise and light "would be of a residential character" is not dispositive. The effects of these impacts on the adjacent neighborhoods and the adjacent residences must be analyzed, and categorized. The report is materially deficient in not addressing these impacts.

3.8-9, Lines 23-24: The statement that additional traffic "would not be added directly to the Del Monte Park neighborhood" has no factual basis in the report. The report must be amended to set forth facts to support this conclusory statement (and note that this statement is vigorously disputed by residents of the adjacent neighborhoods).

3.8-9, Lines 27-31: The report must be amended to provide factual bases for the conclusory statements in this paragraph, that the proposed Project is "considered compatible" with surrounding land uses. The statement that the project would not change the character of nearby residential land uses is not supported by any facts, and is disputed by residents of the adjoining neighborhoods. Therefore, the report must be amended to provide facts to support this conclusory statement.

Section 3.9 - Noise and Vibration

3.9-11, Lines 32-34: Please provide factual basis for the statement that users of trails on or around the Project site are not considered sensitive receptors merely because the Project site is privately owned by the PBC.

3.9-12, Lines 8-9: The report ignores the noise that normal operation of the Project will generate, particularly given the high-density nature of the Project (i.e., 24 units, with residents, guests, vendors, and others). The report must be amended to address this source of noise. That is, not just traffic will be the source of noise.

Section 3.10 - Public Services and Utilities

3.10-2, Line 24: Why is information from 2006 considered relevant to the current report?

3.10-3, Line 2: Please clarify whether "bi-annually" means every two years or twice a year.

3.10-11, Lines 19-20: As noted, above, I believe the estimated total of 78 new residents for the Project is low.

3.10-14, Lines 31, et seq. (Schools): I believe the estimate of eight additional students from the Project is low.

Section 3.11 - Transportation and Circulation

3.11-3, (Table 3.11-1): Regarding Impact E (Parking), please provide the factual basis for the statement that the need for additional parking generated by the Project would be "less than significant". Residents of the adjacent neighborhoods, which will be impacted by overflow parking by guests and visitors to the Project, do not believe this to be the case.

3.11-8, Lines 10, et seq.: Here, and elsewhere in the report, there are statements to the effect that the Project will generate relatively few trips. I urge the consultant to re-examine this entire analysis, as it appears to be based on a host of unsubstantiated assumptions.

3.11-9, lines 5, et seq. (Intersections in Pebble Beach and immediate vicinity) -- The report must be amended to include analysis of the impact of Project-generated traffic on Lighthouse Avenue, a main thoroughfare in Pacific Grove, that is already congested. I do not see Lighthouse Avenue mentioned anywhere in the report.

3.11-9, lines 26-28: Please amend the report to state definitively whether the consultant had made any independent verification of the assumptions cited.

3.11-11, lines 12 et seq.: The detailed analysis of the impact on Pebble Beach gates is nice, but where is the detailed analysis of the general impact on the streets and roadways of Pacific Grove as a whole, and not just various intersections?

3.11-12, Table 3.11-5 (Line 16): The report must be amended to examine the impact of Project-generated traffic (i.e., not only residents, but guests, visitors, vendors, service providers, etc.) on the intersections at Lighthouse and Congress, as well as Lighthouse and Forest.

3.11-14, Table 3.11-8 (Line 13): Please amend the report to state clearly whether any newer data is available.

3.11-14, fn.1: Please amend the report to refer to the 2011/2012 PBC buildout plan as the "final buildout plan", as that is how it was publicized, and commonly referred to. Not to so indicate is misleading.

3.11-21, Lines 22-23: The report should be amended to state the factual basis for the statement that "the likelihood that Project residents would work in Pebble Beach".

3.11-21, Lines 25-28: The report should be amended to discuss the lack of facilities (shopping, groceries, schools, etc.) within Pebble Beach that will impact the number of trips generated by the residents of the Project, as well as the guests, visitors, etc. coming to the Project.

3.11-22, Table 3.11-17 (line 7): This table should be amended to include Lighthouse Avenue, the main commercial thoroughfare in Pacific Grove.

3.11-24, Lines 11, et seq. (Traffic during Project Construction): In line 24, I believe the word "possible" is more properly "probable". The report should be amended to provide the factual basis for the assumption that the construction traffic "may" contribute "a few" peak hour trips. Please amend the report to quantify what a "few" trips means, and the basis for that conclusion.

3.11-32, Lines 4-6: The report should be amended to make it clear that the number of 78 new residents is an estimate only, and that actual conditions may vary significantly. As written, this is presented as a fact, when it is not. Also, the report does not address at all how many individuals could reasonably be expected to be in and around the Project site, as guests, visitors, service providers, etc. The report must be amended to include this discussion and the likely impacts of that additional usage.

3.11-33, Lines 4-6: The report must be amended to provide a factual basis for the statements in this paragraph, dismissing the objections of residents of adjacent neighborhoods re "spillover parking". The report, as noted above, does not address the non-resident use of the Project, and the additional trips generated by that non-resident use.

3.11-33, Lines 14-20: The report must be amended to discuss in detail the additional pedestrian traffic through the Project area.

3.11-33, Lines 21-26: The report should be amended to made it clear that the statements in this paragraph are valid only if Project residents (along with guests and visitors) stay within Pebble Beach, which is not realistic, due to the lack of facilities within Pebble Beach.

3.11-34, Line 28: The word "possible" in this line should be changed to "probable".

3.11-36, Lines 3-8: The report should be amended to accurately reflect the 2012 PBC project approval scope; the Board of Supervisors resolution clearly sets the scope as the then undeveloped properties owned by PBC in the Del Monte Forest; that is, all the then-owned, undeveloped properties, including Area D.

3.11-36, Lines 9-14: The reference to Table 3.11-26, while accurate, is misleading, in that I believe the table itself is erroneous in the number of trips reflected. The report should be amended to show a detailed factual analysis for the assumptions (they are not facts, as far as I can tell) shown in that table, and amended to reflect that these are assumptions only, and not a statement of fact.

3.11-36, Table 3.11-26 (Line 15): The "N/A" designation is, I believe incorrect, in that the consultant is averring that the Project "does not add trips to the intersection". I believe this is not the case. The report should be amended to clearly state that these are assumptions, and should be amended to provide a detailed factual analysis to support this problematic assumption/conclusory statement.

3.11-37, Lines 1-3, et seq.: I note that payment of fair-share contributions is deemed, throughout the report, as adequate and acceptable mitigation of traffic impact. I believe that, although this may be technically correct under current regulations (which I have not verified), payment of money is most certainly not true mitigation; it is merely a condition precedent to a potential future mitigation, if and when the improvement to which the fees are related is ever constructed, and assuming that the improvement, as and when constructed, actually mitigates the condition.

3.11-38, Lines 3-9: Same comment as above regarding amending the report to accurately and completely reflect the scope of the 2012 PBC buildout proposal and approval: i.e., all remaining undeveloped properties owned by PBC in the Del Monte Forest. (That is, including Area D.)

3.11-38, Lines 10-15: As noted previously, the statement in this paragraph that "the Project would contribute 2 or fewer trips to the impacted locations" is based on assumptions, and those assumptions are not necessarily valid. The report should be amended to make it clear that the consultant is making assumptions, and the basis on which those assumptions are made.

Section 3.12 - Water Supply and Demand

As an overall comment on this section, the significant discussion about PBC's funding of a water facility, and the fact that PBC has water entitlements as a result of the funding, ignore the overarching fact that the water supply for the area simply is not adequate to support existing usage, much less any further development, for the foreseeable future. That is, it should be made clear that "entitlement" does not equal or equate to "availability".

3.12-3, Lines 1-5: The report should be amended to provide discussion of the impact of the current, on-going CEQA review of the MPWSP and the GRP, on the proposed project, to explain why the proposed Project should be approved, given this on-going review.

3.12-3, Line 27: I believe the word "could" should more properly be "would". If the consultant believes "could" is correct, please provide a factual basis for that usage.

3.12-17, Line 9: Where is the list of "benefited" properties that is referred to? Please include or point to where it is in the DEIR.

3.12-34, Lines 7-8: Please amend the report to specify the "other Del Monte Forest benefited properties".

3.12-34, Footnote 6: Please clarify the references to the undeveloped lots and the "potential for up to 105 new dwelling units". Are these part of the 2012 approvals? If so, the report should be amended to so specify.

3.12-35, Table 3.12-12 (Line 1): Please amend the report to clarify whether the potential future dwelling units described in the first section, "Potential Future Development in the Del Monte Forest", were all part of the 2012 approval for the buildout of the remaining undeveloped properties owned by PBC in the Del Monte Forest.

3.12-35, Table 3.12-12 (Line 1): Please amend the report to include a detailed discussion of the "proposed LCP Amendment" referred to in the first section, "Potential Future Development in the Del Monte Forest".

3.12-43, Footnote 10: Please amend the report to include a reference to the projected or assumed time frame for release of the referenced Draft EIRs.

Chapter 4 - Other CEQA-Required Sections

4-7, Lines 10-16, Table 4-3: Please include a detailed description of how the potential future development is permitted under the revised LUP, given the 2012 project approval, for the "final" buildout of undeveloped properties owned by PBC in the Del Monte Forest.

Chapter 5 - Alternatives

Comments above have already addressed the consultant's conclusions that certain impacts are less than significant, or would be less than significant after mitigation; as noted, I believe these are erroneous conclusions, and should be addressed in the amended report.

Likewise, comments above have addressed the consultant's failure to investigate some of the proposed alternatives; this should be done, and the analysis and results included in the amended report.

5-4, Lines 33-36: As noted previously the consultant's conclusion that the Project would have a "minor contribution . . . to existing and cumulative traffic and water supply" are, I believe, erroneous, and should be addressed and corrected in the amended report.

5-5, Table 5-1: In the portion of this table dealing with "Alternatives Dismissed", please include the factual basis for the "not financially feasible" comment.

5-5, Table 5-1: The report should be amended to include the reasoning for the "not feasible" alternative merely because a property is not currently owned by PBC.

5-5, Table 5-1: As noted in prior comments, the dismissal of the "Areas in Maria near Ft. Ord", and "Housing Dispersed in Multiple Areas" because no specific sites were suggested is not appropriate; the consultant should work with local nonprofit agencies as well as local cities to determine what sites are or could reasonably be available for construction of affordable housing. In particular, the City of Pacific Grove has stated that at least two sites within the City limits would be available for an affordable housing project. This would meet the requirements of the 2014 (amended) Board of Supervisors approval.

5-5, Table 5-1: Dismissal of the alternative "Use Existing Housing as Rental Housing" is inappropriate, because a variance to the requirements of the Inclusionary Housing Ordinance can be requested. The report should be amended to include a detailed discussion of this possibility.

--

Elinora Mantovani
Mobile: 408.425.3898
<emantovani1964@gmail.com>

Pacific Grove, California
June 17, 2015

Comments on Pebble Beach Draft E I R

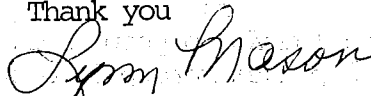
JUN 22 2015

1. Page 5-1 Chapter 5 Alternatives
Page 5-5 Table 5-1 Alternatives Considered
#2 Sunset Drive/17 Mile Drive
This site is preferable to Area D with zoning the only objection. It is not a legitimate objection as is stated on page 5-19 referring to alternative #2 and I quote: "The site is outside the coastal zone and currently zoned C-2, Heavy Commercial District, which allows residential uses with a use permit." Please select Alternative #2 for the development site.
2. Page 5-52 and I quote:
"In summary Alternatives 2 (Sunset Drive/17 Mile Drive) and 4 (Collins Residential Area) would result in similar overall environmental impacts, especially since both sites are previously fully disturbed, and both could be considered the environmentally superior alternative."
Why then would it be acceptable to develop in Area D?
3. I am offended by the term degraded to a forest I love and go to all the time, and upon which the wildlife currently depends. Paraphrasing Paola Berthoin's comments on another project in the Monterey Herald, June 9, 2015:
Oak woodlands support more than three hundred animals and close to 5,000 insect species. Hundreds of oaks are not just trees to be replaced one for one. These oak trees have developed over many decades along with associated plant and animal communities. Trees, dead or dying, provide rich habitat and food opportunities for animals and insects.
4. Page 3-1 Chapter 3 Environmental Setting, Impacts, and Mitigation Measures
Page 3-4 Section 3.4 Climate Change
Page 3-4 Table 3.4-3 Existing Carbon Tree Stock and Carbon Sequestration
The table shows 519.19 Metric Tons of Carbon Sequestration between the oaks and the pines in Area D. All the sequestered carbon would be released by the destruction of the trees. The immediate area would be much less healthy for those living nearby. How can the Pebble Beach Company even consider cutting down all these trees when other areas are environmentally superior sites?

Thank you for taking my comments.

Please send me notice that you received my comments.

Thank you



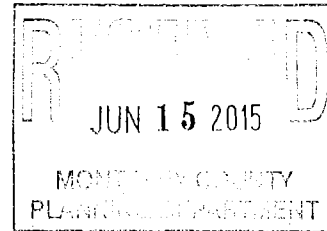
Lynn Mason

P.O. Drawer 9

Pacific Grove, California 93950

Sidor, Joe (Joseph) x5262

From: Peter Mathews [perro_negro@sbcglobal.net]
Sent: Sunday, June 14, 2015 2:11 PM
To: Sidor, Joe (Joseph) x5262
Subject: CEQA comments - PBCo Apts.



Joe Sidor, Associate Planner, MCRMA

RE: PLN130447 PBCo inclusionary housing CEQA Comments for DEIR

Mr. Sidor:

Please include the following comments in response to the DEIR.

The draft EIR states in Chapter 5, page 10, lines 14-17: "The no-project analysis must discuss . . . what would be reasonably expected to occur in the foreseeable future based on *current plans* (italics mine) . . .". "If future uses of the land are predictable, such uses should be discussed as possible no-project conditions." The DEIR further states in lines 22-31 that Area D "*could be* (italics mine) developed . . ." and that the Old Capitol site would not be dedicated. These lines should be deleted from the final EIR because they are misleading and because the DEIR itself states (Ch. 5, p.2, lines 36-38) that the dedication of the Old Capitol site ". . . is required by the prior buildout project condition of approval, not as mitigation for the inclusionary housing project."

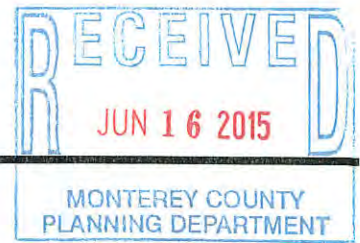
Given the **current drought conditions, mandatory State water consumption cutbacks, likely water rationing, possible moratorium on new water hookups, lack of sustainable and predictable water supply for future uses, no approved current plans for market-rate homes in area D, and declarations of a "final buildout" of the Del Monte Forest**, the "either/or" fallacy of alternative development for Area D for the purpose of creating the **illusion of environmental superiority** should be eliminated from the final draft of the EIR. Further, since the DEIR already states that dedication of the Old Capitol site was a condition of approval for the "final" buildout, as such it is not to be considered as mitigation for the inclusionary housing project (nor should it be considered in the no-project analysis).

Accordingly, I request that the final EIR reflect these comments in the following ways:

CH. 5 page 20 Area D Buildout - eliminate this entire paragraph. Amend all reference and analysis of this hypothetical and unlikely development.

Respectfully,
Peter Mathews
2864 Coyote Rd.
Pebble Beach, CA 93953

Gonzales, Eva x5186



From: Peter Mathews [perro_negro@sbcglobal.net]
Sent: Tuesday, June 16, 2015 9:44 AM
To: ceqacomment
Subject: PLN140337 PB inclusionary housing DEIR comments
Attachments: DEIR comment2.pdf

Attached please find comments for inclusion in the EIR.

Thank you,

Peter Mathews

6/15/15

Joseph Sidor, Assoc. Planner, MCRMA

Re: CEQA comments for DEIR, PBCo inclusionary housing project

Mr. Sidor:

The Methodology used for the DEIR to estimate the number of residents of the new project is fundamentally flawed. The Monterey County Low-Income Housing rules mandate minimum occupancy requirements, as well as maximum limits. Based on the floor plans of the proposed project, the occupancy would be within a range of 56 and 136 people. An average occupancy, therefore, could be reasonably expected to be around 96 residents (average of range). The Federal estimated average household size used in the DEIR methodology is irrelevant to the fact situation here.

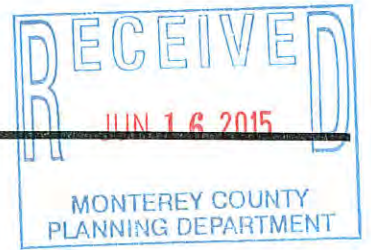
I therefore request that the final draft:

- 1) Remove Chapter 3, section 3.8, page 7, lines 21-34.**
- 2) Use methodology involving application of existing rules regarding mandated occupancy limits (upper and lower) for purposes of this section.**
- 3) Revise any other section of the DEIR that may have relied on the incorrect estimate (pedestrian safety, traffic, etc.).**

Thank you,

Peter Mathews
2864 Coyote Rd.
Pebble Beach, CA 93953

Gonzales, Eva x5186



From: Peter Mathews [perro_negro@sbcglobal.net]
Sent: Tuesday, June 16, 2015 9:47 AM
To: ceqacomments
Subject: PLN130447 PB inclusionary housing DEIR comments 2
Attachments: DEIR comment3.pdf

Attached are some comments for inclusion in response to the DEIR. Please confirm receipt of this email.

Thank you,

Peter Mathews

6/15/15

Joe Sidor, Associate Planner, MCRMA

RE: PLN130447 PBCo inclusionary housing CEQA Comments for DEIR

Mr. Sidor:

Please include the following comments in response to the DEIR.

The traffic study is woefully inadequate. I live near the project site, at the foot of Ortega Road. As has been stated at the DMFLUAC meetings regarding the project, the EIR Scoping meeting, the HAC meeting and elsewhere, the traffic impact on pedestrian safety in adjacent Pebble Beach neighborhoods has been completely ignored in the previous traffic "study", and the new iteration is mostly a re-hash of the previous so-called study. A very real, foreseeable and pernicious danger exists due to shortcuts taken through residential areas between S.F.B. Morse Dr./Congress Rd. and Spanish Bay. Ortega Road is particularly impacted by these short-cuts. The roads are very narrow and bordered by deep drainage ditches. Vehicles moving in opposite directions must pull over to accommodate passing. Pedestrians are forced off the road. My 95-year-old Mother-in-law has taken a fall in such a situation requiring hospitalization. Many other elderly residents walk here. This dangerous situation will only be exacerbated by tenants of the project driving down Ortega on their way to work at Spanish Bay, the Lodge, or the MPCC. In addition, the turn onto Ortega from Morse is a blind corner, making collisions inevitable.

The traffic study lists policies in place addressing traffic impacts in the project area. One of those, **Policy 108**, states the following:

"Policy 108. Applications for development in the Forest shall include an analysis of the traffic generation of such development and an analysis of the probable routes of such traffic."

Accordingly, I request that the final EIR reflect these comments in the following ways:

Traffic Study:

1) Include *actual* traffic counts at the intersections included in the study, and additional *in-situ* analysis of existing problems with pedestrian safety on residential connector streets adjacent to the project site; most specifically Ortega Road.

2) Include study of the feasibility of closing off the end of Ortega Road where it intersects S.F.B. Morse Dr. as part of the mitigation to improve pedestrian safety

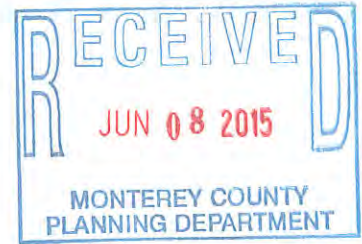
and to prevent vehicle collisions on the blind curve.

Respectfully,

Peter Mathews
2864 Coyote Rd.
Pebble Beach, CA 93953

Sidor, Joe (Joseph) x5262

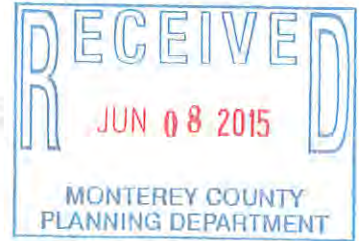
From: Carol McCarthy [carolmc@montereybay.com]
Sent: Saturday, June 06, 2015 4:46 PM
To: Sidor, Joe (Joseph) x5262
Subject: PBC Inclusionary Housing DEIR Comments
Attachments: Inclusionary Housing DEIR 2015 CarolMc.doc



Joe,
My comments to the PBC Inclusionary Housing DEIR are attached.
Carol McCarthy

Carol McCarthy Response

To: Joe Sidor, Monterey County Planning Department (sidorj@co.monterey)
From: Carol McCarthy (carolmc@montereybay.com)
Dated: June 6, 2015



Re: Response to the DEIR for the Pebble Beach Company Inclusionary Housing Project

Please respond to my following comments on this DEIR.

Executive Summary

Environmentally Superior Alternative (page ES-12, lines 9-13)

“A key consideration in identifying the environmentally superior alternative is that the alternatives vary in terms of impacts associated with inclusionary housing development, as well as in terms of impacts associated with in-lieu fees, and with the reasonably foreseeable buildout potential for Area D.”

What does “reasonably foreseeable” mean in real-time? The first-time reader has no idea. Since the site choice decision for Inclusionary Housing will be based on this EIR and the subjects of buildout and water supply are complex issues, a footnote reference should be made to the appropriate sections in Chapter 3 that explain the buildout and water issues in detail.

Table ES-1: Summary of Project Impacts and Mitigation Measures, 3.5 Cultural resources, A. Historical Resources, CR-A1

“The Project would not cause a substantial adverse change in the significance of a historical resource.”

The following quote I am providing is from an article concerning a taped interview of SFB Morse discussing the history of the company which appeared in in the Carmel Pine Cone, April 3 ,2015. I believe it is historically relevant to the current PBC development plan and perhaps should be included in the DEIR.

“SFB Morse was criticized for putting the Crocker Grove cypress into a preserve instead of subdividing it into home sites. ‘While we have been criticized by some of our stockholders for this action, we believe that it is only the proper course for us to follow, but we think it has proven and will prove in the future a good business move on our part, because what property is left here for sale is immensely increased in value by the fact that this great forest will remain a park, we hope, forever.”

Chapter 3, Land Use and Recreation

Local, Monterey County Zoning Ordinance, Zoning History of Project Site

(page 3.8.4, lines 14-28); Table 3.8-2. Project Site Zoning History (line 24):

Thank you for providing the zoning history. This table lists zoning for prior-to-Sept 16, 1969, Sept 16, 1969, and July 20, 1993. However, in the Del Monte Forest Area Land Use Plan (Amendment Certified by Coastal Commission, March 28, 1985 & Board of Supervisors Acknowledgment of the Coastal Commission's Amendment Certification, May 19, 1987) on page 55, Table A -"Summary of New Planned Development in Del Monte Forest, under "Gowen Cypress," Area D is listed as "No New Development Acreage" and "No New Residential Dwellings." I think this citation could be included in the Zoning History section, especially since it refers to no development acreage and no new residential dwellings, which is different from the development goals for Area D today.

(page 3.8-5, lines 9-11)

"The project site was not previously proposed for preservation by PBC as part of the 2011 buildout project or as part of the prior Measure A proposal."

Please note: The "Pebble Beach Company's Del Monte Forest Preservation and Development Plan," Final EIR, January 2005, states in the:

Executive Summary - 17.1 acres of Area D were proposed in the Executive Summary as a New Preservation Area in Table 2.0-3 "Proposed Dedication Areas and Other Resource Management Areas," and
-Chapter 3 -Figure 2.0-2-"Proposed Dedication Areas and Other Resource Management Areas" - Area D is shown as Preservation Area (New), colored green, according to the legend.

I think this information should be added to the DEIR. Thank you.

Sidor, Joe (Joseph) x5262

From: mickey.mcguire@comcast.net
Sent: Saturday, May 23, 2015 9:42 AM
To: Sidor, Joe (Joseph) x5262
Subject: Response to the DEIR about affordable housing in Area D, Pebble Beach

Dear Mr. Joe Sidor, Monterey County Planning Department

Please respond to the following problem with the DEIR.

Alternative 2 – Sunset Drive/17-Mile Drive (line 24, page 5-19)

Alternative Characteristics (line 25, page 5-19)

24 inclusionary Housing Units at Sunset Drive/17-Mile Drive (line 26, page 5-19)



This alternative does not encroach on the coastal zone and is zoned C-2 which can be adapted to residential use with a use permit. (lines 30-36, page 5-19)

The claim that there would be a possible build out of 31 residential units in Area D (lines 11-12, page 5-20) if this alternative site were selected is disingenuous at best given that the final build out already includes a commitment of 90 units of the possible 100 residential units available. This would imply that the final build out is either, in reality, 131 residential units or that 31 of the 100 residential units would be reserved for a build out in Area D. This assertion is either incorrect and must be corrected or disregarded as a red herring fallacy in reasoning. At a minimum, this inaccuracy or erroneous assertion must be corrected and removed from the DEIR or corrected to state that there are a potential of 131 residential units, not the total stated of 100 residential units, or the "final build out" is not really the final build out.

Traffic impacts for highway segments (Significant and unavoidable with mitigation.) page 3.11-38, lines 10-14. The assertion is that the Project would contribute 2 or fewer trips to the impacted locations listed in Table 3.11-27. Even with the payment of a fair-share contribution, this would not reduce the impact to less-than-significant levels. The assertion that the Project would only contribute 2 or fewer trips to the impacted locations appears to be inconsistent with the prior assertion in the DEIR that the Project would generate 13AM and 15PM trips per day through PBC gates. It is unclear how the DEIR traffic circulation study determined that only 2 or less of these trips would be through the highway segments listed in Table 3.11-27. If more than 2 trips per day were taken along these highway segments, the impact would presumably be much greater even with fair-share mitigation contributions. This analysis is flawed on its face due to the lack of clarity as to how it was determined that only 2 or fewer of these 13-15 trips per day would be on the affected highway segments. In addition, if the lower income Project residents were employed outside Pebble Beach, the number of trips per day would be significantly higher and therefore produce an even great impact on traffic circulation. Because paying the fair-share contribution will not reduce the impacts to

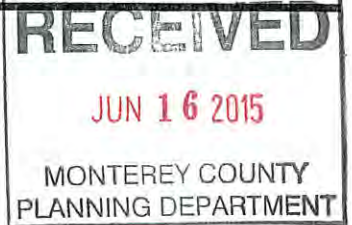
less-than-significant, this Project should be moved to an area that where the impacts could be mitigated to a less-than-significant level. There are a number of alternative sites that were included in the DEIR and traffic analysis of a more rigorous nature should be undertaken to compare the impacts resulting from moving the Project to these alternative sites in terms of how the impacts may be mitigated to a less-than-significant level.

Thank you for your attention and consideration of these problems.

Mickey McGuire
1126 Sawmill Gulch Road
Pebble Beach, CA 93953

Gonzales, Eva x5186

From: Judy Midgley [judy@judymidgley.com]
Sent: Tuesday, June 16, 2015 9:09 AM
To: ceqacomment
Subject: Area D EIR



TO: Joseph Sidor, Associate Planner

I wanted to comment on the EIR just completed for the Inclusionary Housing project proposed for Area D in Pebble Beach. I don't feel the increased traffic situation was adequately addressed. Morse Dr. turning into Congress is extremely busy as of now. There is a school bus stop right on a blind corner near the intersection of Ortega and Congress. I don't know what mitigation factors there could be short of a traffic signal to handle the increased traffic this additional housing will generate. I also feel that there was inadequate study made of alternate sites for this project. The site at 17 Mile Drive and Sunset seems particularly favorable. It is near schools, bus lines and is already positioned near existing apartments. Area D is in an R-1 zone where existing, neighboring homes are all on 1/4 acre lots. This will hugely increase the density. If built in this location, it will change our neighborhood forever.

Sincerely,

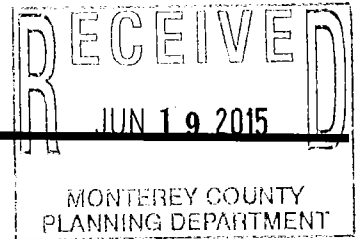
Judy Midgley
2870 Congress Road
Pebble Beach, CA 93953

--
JUDY MIDGLEY
Sotheby's International Realty
200 Clocktower Suite 100D, Carmel, CA 93923

(831)596-0027

www.judymidgley.com

Gonzales, Eva x5186



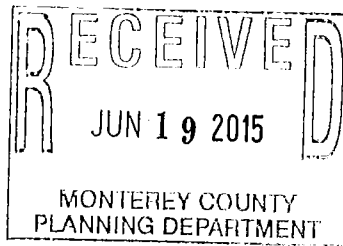
From: Galletti, Donna x7909
Sent: Thursday, June 18, 2015 10:36 PM
To: ceqacomments
Cc: Sidor, Joe (Joseph) x5262
Subject: PLN 130447, DEIR
Attachments: DRAFT EIR June 2015.doc

See attached.

A hard copy is in Inter-Office mail to you also.

Donna L. Galletti
Crime Prevention Specialist
Monterey County Sheriff's Office
Coastal Station-Monterey
1200 Aguajito Rd, Rm. 002
Monterey, CA 93940
(831) 647-7909
(831) 647-7888 (fax)
gallettid@co.monterey.ca.us

MEMORANDUM



County of Monterey
Office of the Sheriff

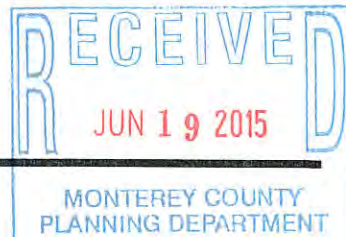
Date: 06/18/15
To: Joseph Sidor, Associate Planner, RMA
From: Donna Galletti-Coastal Station Patrol
Subject: PLN 13-0447
Pebble Beach Company Inclusionary Housing Project



After review of Section 3.10:

The Sheriff's Office does not have any corrections to Section 3.10, page 3.10-3. All information noted for General Public Safety and Security Guidelines is correct.

The Sheriff's Office does not have any corrections to Section 3.10, page 3.10-6. All information noted for Police Protection, as well as the information noted in Table 3.10-2 is correct.



Gonzales, Eva x5186

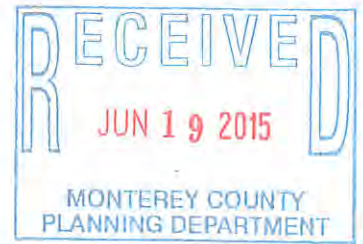
From: Lisa Rheinheimer [lrheinheimer@mst.org]
Sent: Friday, June 19, 2015 8:58 AM
To: Sidor, Joe (Joseph) x5262
Cc: ceqacomments
Subject: MST Comments on Pebble Beach project
Attachments: MST Pebble Beach Inclusionary Housing EIR Comments June 2015.pdf

Hi Joe,
Please accept the attached comments from MST on the Pebble Beach Inclusionary Housing DEIR.
Please feel free to let me know if you have any questions.
Thank you,
Lisa

Lisa I. Rheinheimer
Monterey-Salinas Transit
Director of Planning and Development
Phone: 831-393-8124
Email: lrheinheimer@mst.org
One Ryan Ranch Rd.
Monterey, CA 93940

MST

MONTEREY-SALINAS TRANSIT



TRANSIT DISTRICT MEMBERS:

*City of Carmel-by-the-Sea • City of Del Rey Oaks • City of Gonzales • City of Greenfield
City of King • City of Marina • City of Monterey • City of Pacific Grove • City of Salinas
City of Sand City • City of Seaside • City of Soledad • County of Monterey*

June 19, 2015

Joseph Sidor
Associate Planner
Monterey County RMA - Planning
168 W. Alisal St., 2nd Floor
Salinas, CA 93901

**RE: MST Comments on Draft EIR for
Pebble Beach Company Inclusionary
Housing Project**

Dear Mr. Sidor:

Monterey-Salinas Transit appreciates the opportunity to comment on the Draft Environmental Impact Report and proposed Pebble Beach Company Inclusionary Housing Project. The proposed project is in close proximity to MST Line 2 which connects passengers in Pacific Grove to the Monterey Transit Plaza and Carmel. From the Monterey Transit Plaza, passengers can connect to other MST lines which travel to Santa Cruz, Salinas, San Jose, and beyond.

The close proximity of the proposed development to a bus stop on Line 2 is ideal for connecting the future residents with other parts of the region. As such, we recommend that the development include a pathway to Miles Street, which is the most direct walking route to the closest bus stop at Montecito and Miles. We also recommend that the development include providing an initial 31-day bus pass for the new residents of the development to help mitigate the single auto use associated with this development and to help reduce greenhouse gas emissions.

Thank you for the opportunity to help strengthen the mitigation measures associated with the draft EIR for this project. Access to MST transit services will be a critical need for this project. Public transit is a vital means of transportation for our residents and especially those of limited means.

Monterey-Salinas Transit provided over 4 million rides last year and continues to be important for our economy, our environment, and the social fabric of our community.

Mr. Joseph Sidor
June 19, 2015
Page 2 of 2

If you have any questions about these comments, please contact Lisa Rheinheimer,
Director of Planning and Development at (831) 393-8124 or lrheinheimer@mst.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hunter Harvath', with a stylized flourish at the end.

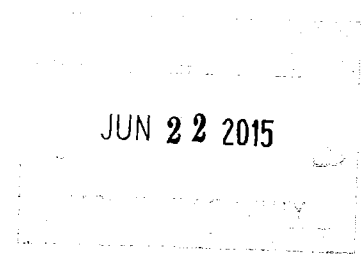
Hunter Harvath
Assistant General Manager
Finance and Administration

Joseph Sidor, Associate Planner

Monterey County Resource Management Agency – Planning

168 W. Alisal St., 2nd Floor

Salinas, CA 93901



Friday, June 19, 2015

Dear Mr. Sidor,

Enclosed is a hard copy of an e-mail that I sent to you on Thursday, June 18.

Noelle Nichols

1216 Lincoln Avenue

Pacific Grove, CA 93950

e-mail: frenchirishlass@yahoo.com

Joseph Sidor, Associate Planner

Monterey County Resource Management Agency – Planning

168 W. Alisal, 2nd Floor

Salinas, CA 93901

Friday, June 19, 2015

Subject: "Area D" "Affordable Housing" plan by Pebble Beach Corporation

At the ends of our streets in Del Monte Park on David Avenue, Lincoln Avenue, and 2 or three more ends of parallel streets, exists a pristine wooded area. In the morning, neighbors and their dogs meander down there to walk and start the day. In the evening, neighbors and I, again walk to the ends of these streets to visit that wooded area. My children, grand children and dogs have loved this area for 36 years.

It is one of five areas where the Monterey Pine grows, among many other trees and bushes. It is home to hawks, deer, other birds and animals. It is visited by children, allowed to play in this safe area, sometimes unescorted by their parents. It is a source of beauty, pleasure and oxygen creation.

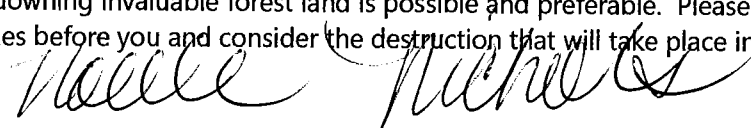
Pebble Beach Corporation recently completed a cement parking lot, adjacent to the Spanish Bay resort entrance. Many trees were felled. If the Area D plan is to take down about 1000 trees, then this newer parking lot took down, probably three times that amount. From what I count, 40 trees were planted in their place, surrounded by cement, and preventing reseeding because of cement surroundings.

This estimate of the loss of approximately 1000 trees for the proposed construction, is a great underestimate, as it does not take into consideration all of the seedlings and non-mature trees.

For this exquisite piece of forest to be replaced by apartments, parking, lighting, and a blocking fencing at the end of our streets would be a great loss for the citizens and for the environment. Pebble Beach Corporation is summarily downing "our" forest in what once it named as a protected area.

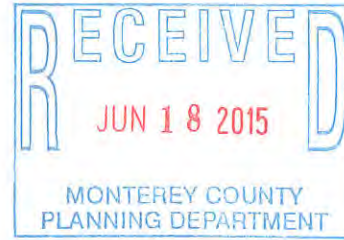
Building without downing invaluable forest land is possible and preferable. Please consider this plea as this proposal comes before you and consider the destruction that will take place in its execution.

Noelle Nichols
1216 Lincoln Avenue
Pacific Grove, CA 93950
frenchirishlass@yahoo.com
831-649-5582



Sidor, Joe (Joseph) x5262

From: Eugene Obrien [ejobrien361@gmail.com]
Sent: Thursday, June 18, 2015 3:53 PM
To: Sidor, Joe (Joseph) x5262
Subject: PLN130447;SCH#2014081052



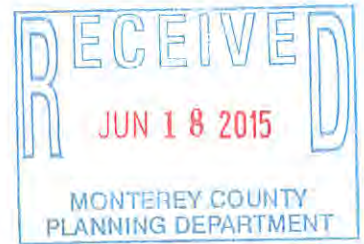
TO Mr.Sidor

From:Mr.E.J.O'BRIEN

This e-mail is sent to apprise you of my lack of consent to build low-income multi-family housing
Right across from my home at 999 seventeen mile drive in Pacific Grove. I realize the EIR is not
completed but I wanted to express my concerns.

Regards,

E.J.O'BRIEN



From: Old Forest [mailto:oldforestgroup@gmail.com]
Sent: Thursday, June 18, 2015 12:39 PM
To: Sidor, Joe (Joseph) x5262; ceqacomment
Cc: ob@co.monterey.ca.us
Subject: PLN130447 (DEIR) Comments on Pebble Beach Company (Inclusionary Housing Project)

Comments on the D.E.I.R. for the Pebble Beach Company (Area D) Inclusionary Housing Project PLN130447

We believe the D.E.I.R. already proves that Alternate Sites are Superior to the Area D forest for building Pebble Beach Inclusionary Housing.

The science of this E.I.R. demonstrates that the project will have negative, significant, and unavoidable impacts - even after mitigation - on both "traffic and circulation" and "water supply and demand". Further, while the developers claim this forest is not worth saving, they are also claiming that they will put in place a restoral plan for the remaining parts of this same forest - which are in identical condition. This is mitigation they would be legally required to accomplish in exchange for their destruction of "biological resources".

The point of the CEQA required Environmental Impact Report process is to determine if there are alternative locations where a project's objectives can be more or less met, but where less environmental damage would occur. In this case the report has identified two of these "environmentally superior alternatives" in and bordering Pebble Beach, and so this forest must be spared.

To destroy the Area D old growth forest for the purpose of building this project Monterey County would need to adopt a Statement of Overriding Considerations claiming that the benefits of the project outweigh the unavoidable environmental impacts. This is now impossible because, regardless of the projects benefits, it has been proven that there are at least two environmentally superior alternate locations where this housing could be built and still achieve its objectives.

This forest has been beloved for generations. The Pebble Beach Company had posted it as a "Del Monte Forest Preservation Area". The report of 725 trees to be destroyed is inaccurate. Only trees of two especially endangered native species are guesstimated, and only trees over 4 inches in diameter of those. Many hundreds more will actually be removed.

Destroying all of these trees and other plants, this migratory bird stop, and all of this watershed and habitat, and displacing all of this wildlife — to cram in housing that can easily be better and, for the new residents, more safely situated nearby on sites already deforested by the Pebble Beach Co. would not be just a ridiculous and now illegal choice, it would also be a very violent crime.

Please also consider the following points and answer the following questions:

1. Why are you not taking into consideration the advantageous environmental impacts of infill development as applied to the 17 Mile Dr. and Sunset and the Collins Residential sites?

The Monterey County General Plan recognizes the need to consider infill. Policy LU-1.9 of the Monterey Co. General Plan states, "Infill of vacant non-agricultural lands in existing developed areas and new development within designated urban service areas are a priority. Infill development shall be compatible with surrounding land use and development."

2. According to the Summary Comparison of the Inclusionary Housing including the Area D buildout (pg 5-52) - please explain, based on the current project description, why are the sites that have been previously disturbed considered environmentally inferior to the proposed project site where hundreds of trees would be cut down.?

3. What is the rationale or requirement for including the development of the Area D forest in addition to the development of this project - when Area D buildout is not identified as a condition of this project? This DEIR analysis appears to be relying on the development of Area D. For that to be a valid analysis, the buildout of Area D would need to be a condition of this project.

Chapter 3, Environmental Setting, Impacts, and Mitigation Measures
Section 3-3 Biological Resources

Please consider "Monterey Pine Forest Conservation Strategy Report" by Jones & Stokes Associates, Inc. 1996. On page 1-5 it states "The association between geomorphic surfaces and Monterey pine forest is used in this study as an indicator of forest diversity. High priority is given to conservation of representative and sustainable stands of Monterey pine forest on

each of the geomorphic surfaces.

The assumption is that preservation of the greatest diversity of Monterey pine forest across geomorphic surfaces will ensure the greatest diversity of forest subtypes, species, and genetic variation within species." On page 2-2 it states "Geomorphic surfaces with greatly reduced extent (80% or more loss) of Monterey pine forest from historical distribution are middle-aged dunes, oldest dune, marine terrace 2, marine terrace 3, and marine terrace 4 (Table 9)."

4. Are you considering the preservation of the Monterey pine forest on the marine terrace 3 geomorphic surface taking into consideration the cumulative loss including recent development projects since 1996 and pending development such as the current Pebble Beach Build-Out Project? If so please show how.

5. The proposal has the potential to significantly alter and further degrade the site's environmental setting and we disagree that the significant impacts to the special status species can be reduced to less than significant levels with mitigation. The proposal will significantly impact a number of special status species, both wildlife and plants, under both the California Fish and Game Code and Federal Environmental Species Act.

As shown on Table 3.3-3 Special-Status Species Potentially Present at Project Site, species potentially impacted include Monterey Pine, California red-legged frog, Cooper's hawk, Sharp-shinned hawk, and White-tailed kite to name a few. Although degraded, the site is habitat for a number of species, and if managed properly, has potential to become a higher quality habitat area. Additionally, the development further fragments existing habitat area and will further interfere with wildlife movement.

6. Please revise the Draft EIR to address the impacts to the special status species caused by the systematic removal of forested areas in the vicinity of the project site, including the parking lot at the corner of Congress Avenue and 17-Mile Drive, recent single-family development along Congress Avenue in the last decade, and any other pipeline projects. If you believe you have already done this, will you please demonstrate how?

7. Development in Area D will create more fragmentation of the Del Monte Forest. Will you please explain how you have quantified the additional resulting environmental impacts to be expected from this further fragmentation?

8. Development will increase traffic hazards to wildlife. It will also increase particulate matter along S.F.B. Morse Drive and in neighboring Pacific Grove. Will you please explain how you have accounted for and quantified these additional environmental impacts?

9. The deforestation of Area D will destroy habitat and displace wildlife. Will you please explain how you have accounted for and quantified these additional impacts on the surrounding residential neighborhoods - including endangerment to children and pets?

10. Please consider the following excerpts concerning the emergency nature of the need California has to preserve the Monterey pine. With reference to the expert information below please explain: how could it be preferable to build this project in Area D when compared to the "environmentally superior alternative" of either 17 Mile Drive/Sunset Ave or the Collins Recreation Area ?

Native groves of Monterey pine trees occur naturally in only five places in the world: three populations in Central California and on two small Mexican Islands. Ecologists have surmised that the extent of Monterey Pine Forest in the three native populations along California's coast was approximately 23,900 acres at the time of first European contact. Today only approximately 60 percent of that acreage remains and only 10,173 acres are undeveloped native forest in a natural setting. Protected Monterey Pine Forest acreage is an even smaller 4,793 acres. (Bates, Dalessio, Nedeff and Stevens. The Monterey Pine Forest. Pine Nut Press, 2012)

The native Monterey Pine Forest habitat is deteriorating due to pressure from development, habitat fragmentation, disease, fire suppression and genetic contamination. It is estimated that some 7,000 acres on the Monterey Peninsula were logged in the 1860s, and Sawmill Gulch in Pebble Beach bears its name as a testimony to this activity. The decline of the Monterey Pine Forest continued through the 19th century and into the 20th. Logging operations escalated in the 1940s, fueled in part by the post-war housing boom. The last of the mills ceased operation in the early 1980s. Pine pitch canker emerged in the 1980s as a threat to the Monterey pine. Ecologists observed the rapid spread of this disease and theorized it could massively reduce the population of Monterey pines within a few years. Pine pitch canker has killed thousands of Monterey pines, is by no means under control and remains a threat. **Habitat fragmentation is also a threat. The piecemeal loss and fragmentation of the natural forest community reduces the interconnectedness of forest lands as a whole. The value of habitat corridors for the genetic viability of the wildlife supported in these environments cannot be overstated.** An additional threat is genetic contamination. The natural resilience of our native trees is threatened with potential genetic contamination from non-indigenous Monterey pines. Weakened genetic composition of the Monterey Pine Forest can cause individual trees to become increasingly susceptible to disease. (Bates, Dalessio, Nedeff and Stevens. The Monterey Pine Forest. Pine Nut Press, 2012)

The Monterey Pine is rare and likely threatened in its native range, according to the International Union for the Conservation of Native and Natural Resources (IUCN) and the California Native Plant Society (CNPS). The California Coastal Commission considers the general habitat supporting Monterey Pine Forest as "Environmentally Sensitive Habitat Area." The Coastal Commission recognizes that it is not just about the trees, which are indeed rare in their native range, it

is also about the unique habitat and environmental conditions that create the Monterey Pine Forest ecosystem. In 1998, the U.S. Fish and Wildlife Service (FWS) recognized four native plants on the Monterey Peninsula as endangered under the Endangered Species Act: Yadon's piperia, coastal dunes milk-vetch, Hickman's cinquefoil and Monterey clover. These federally protected plants grow in association with the Monterey Pine Forest and are endemic to the Monterey area. In addition, the FWS also designated Gowen cypress as threatened. Gowen cypress is an endemic cypress species associated with the core forests of Monterey pines on the Monterey Peninsula.
(Bates, Dalessio, Nedeff and Stevens. The Monterey Pine Forest. Pine Nut Press, 2012)

How can something as common as Monterey pine be threatened with extinction? Consider the American chestnut, which was formerly a dominant tree in much of the eastern United States. The chestnut is now extinct in the wild due to an exotic disease. Native stands of Monterey pine trees are far more rare than the chestnut was in its natural habitat. Our Monterey Pine Forests are increasingly vulnerable to the diseases and habitat constraints imposed upon this forest ecosystem.
(Bates, Dalessio, Nedeff and Stevens. The Monterey Pine Forest. Pine Nut Press, 2012)

11. What is the current state of previously required PBC mitigation measures over as much as the last 30 years of stewardship and restoration in among other places Sawmill Gulch and The SFB Morse Botanical Reserve?
12. What has been the ability of the County of Monterey to provide oversight, and to assure and verify these past mitigations?
13. The Del Monte Forest Conservancy was set up by the PBC. What review have you done of their operations and of the results of their efforts?
14. Based on the answers to question numbers 11, 12, and 13 above, how confident are you that you can predict PBC, Del Monte Forest Conservancy, and Monterey County resources, intentions and abilities with respect to any mitigations required for this project - and what information can you cite for your conclusion?

Thank you for your consideration,

Cam Schure
for **The Old Forest Group**

Enclosed is a petition to save the trees on Congress

[Handwritten signature]

delivered on June 19th 2015.

RECEIVED
MONTEREY COUNTY
JUN 19 11:03
OFFICE OF THE BOARD
ETD

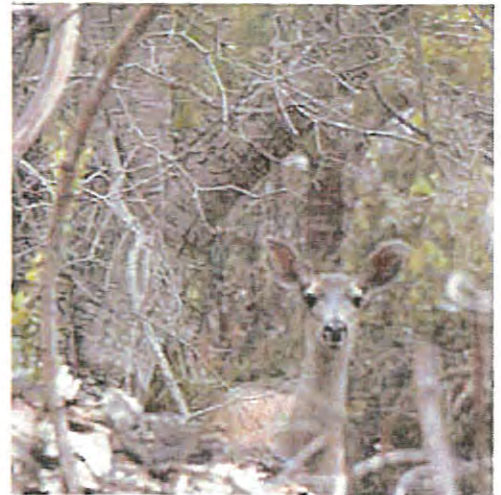
RECEIVED
JUN 19 2015
MONTEREY COUNTY
PLANNING DEPARTMENT

Help Save This Forest!

Pebble Beach Co. plans to destroy this old growth Monterey Pine forest. More than 700 trees will be DESTROYED, Monterey pines and live coastal oaks. Only large trees were counted, countless small trees will be lost as well.

A natural forest canopy --- GONE!
A home to wildlife ----- GONE!

Say no to paving paradise.

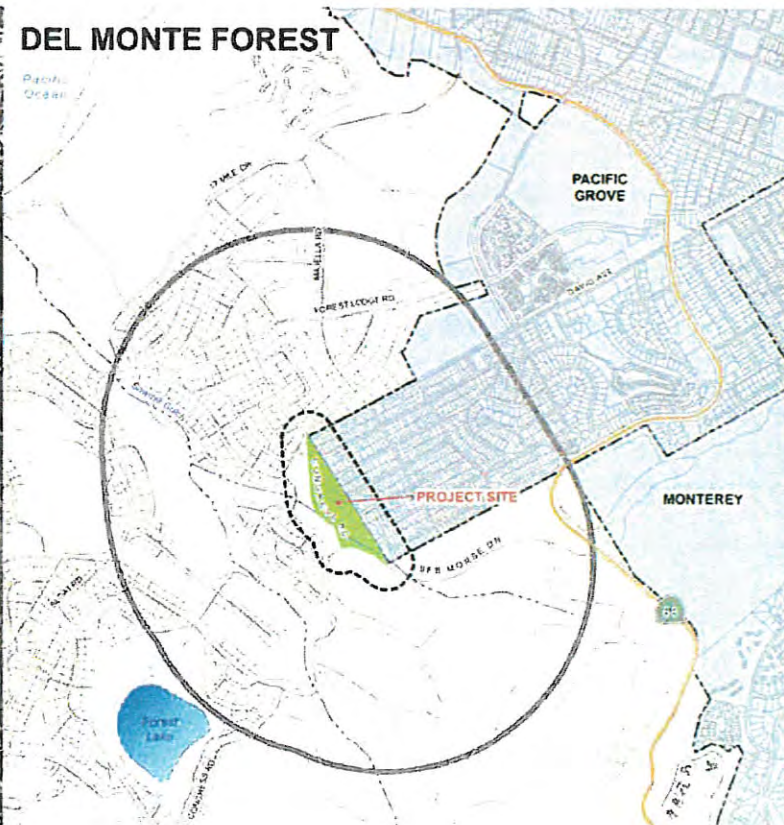


To help save this forest contact OldForestGroup@gmail.com, call Cam Schure at 831-372-0626, or come to one of our meetings on the 1st and 3rd Tuesdays of the month, 7:00 pm, 1123 David Ave., Pacific Grove.

Send your written statements of objection to:

the Monterey Co. Planning Commission, www.co.monterey.ca.us/planning/dept/staff.htm, SidorJ@co.monterey.ca.us, the Monterey Co. Board of Supervisors, www.co.monterey.ca.us/cob/supervisor.htm, district4@co.monterey.ca.us and district5@co.monterey.ca.us.

For more information see www.oldforestgroup.org.

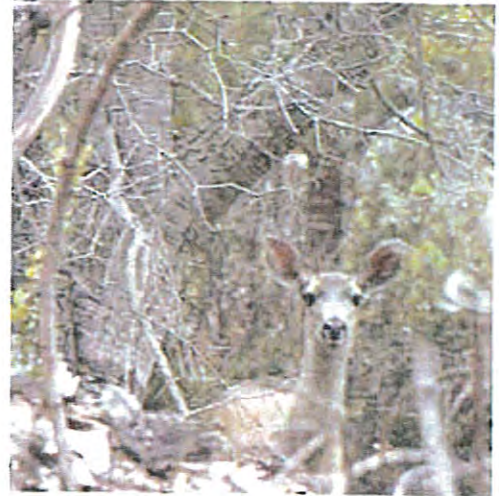


Help Save This Forest!

Pebble Beach Co. plans to destroy this old growth Monterey Pine forest. More than 700 trees will be DESTROYED, Monterey pines and live coastal oaks. Only large trees were counted, countless small trees will be lost as well.

A natural forest canopy --- GONE!
A home to wildlife ----- GONE!

Say no to paving paradise.

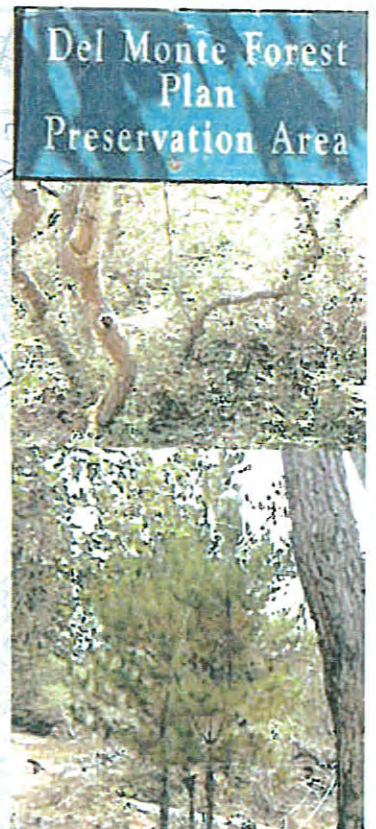
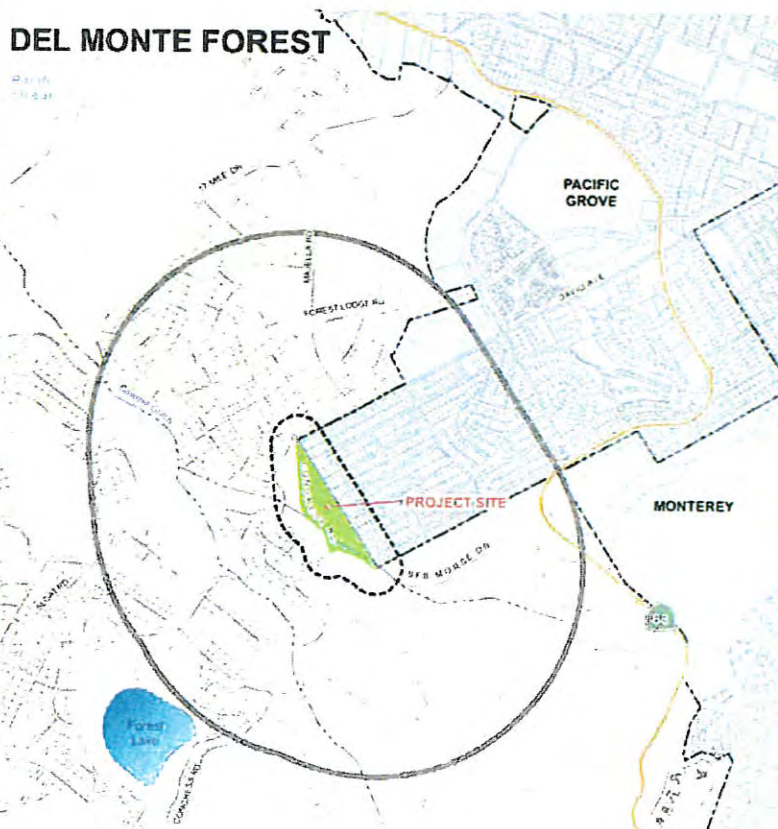


To help save this forest contact OldForestGroup@gmail.com, call Cam Schure at 831-372-0626, or come to one of our meetings on the 1st and 3rd Tuesdays of the month, 7:00 pm, 1123 David Ave., Pacific Grove.

Send your written statements of objection to:

the Monterey Co. Planning Commission, www.co.monterey.ca.us/planning/dept/staff.htm, SidorJ@co.monterey.ca.us, the Monterey Co. Board of Supervisors, www.co.monterey.ca.us/cob/supervisor.htm, district4@co.monterey.ca.us and district5@co.monterey.ca.us.

For more information see www.oldforestgroup.org.



SAVE THE FOREST

NAME	ADDRESS	EMAIL	Phone
Eric Swartz ERIC SWARTZ	1213 Benbow Pl. Pebble Beach, CA 93953	e-swartz@yahoo.com	831-247-2547
June Downs JUNE DOWNS	1122 Wildcat Cyn. Rd. Pebble Beach CA 93953		831-373-3660
Judith A. Gilbert JUDITH D. GILBERT	1122 Wildcat Cyn Rd Pebble Beach, CA 93953		831-373-3660
Gail Nwosha Gail Nwosha	1118 Wildcat Cyn Pebble Beach CA		
Alex Plain	3115 Middle Ranch Road	aplain4@yahoo.com	
Gealbetter Ledbetter	3075 EL TORO Road	3ledbetters @sbglobal. net	(831) 647. 1785

Save the Trees (SAVE THE FOREST)

MARIA SHAYKOVÉ Maria Shaykova	3084 LARKIN RD PEBBLE BEACH CA 93953	mishmop @ 9 mail .com	831-324-4924
Josephine YONAN	3072 Larkin Rd. Pebble Beach, CA 93953		(831) 375-8554
Bob BROOKMAN RMBROOKMAN	3001 SWAT RD PEBBLE BEACH CA	RMBROOKMAN@ ME.COM	831-277-6445 831-645-8616
ELLIE BROOKMAN Ellie Brookman	1082 MISSION Rd PEBBLE BEACH CA 93953	EBROOKMAN7 @ AOL.COM	831-277-6430
MARY SUE WOODCOCK Mary Sue Woodcock	3087 Sloat Rd. Pebble Beach CA 93953		831-649-3717



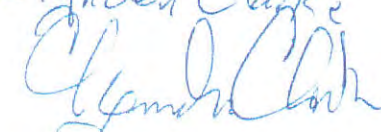


SAVE THE FOREST

JAROSLAV & HANA STEPANEK	3063 LARKIN RD. PEBBLE BEACH	stepanekj@ comcast.net	831 6494633
Charles & Mary Ann Spongenberg	3071 Sloat Rd.		831-395-6493
MARYANNE WILSON	3067 Sherman Rd Pebble Beach	mawilson1977 @gmail.com	831-373-8288
Twylene McGraw 3031 Sloat Rd Pebble Beach CA	Francisca Sambri Frank Jauli 3016 Sloat Rd PB. CA 93953		Save the trees!!! No water to support development
Vivian Sambri 3016 Sloat Rd PB Ca 93953	No water Save tree/wildlife flora/fauna.		

Sam Morse Dedication Plaque at Cone Cypress

"He had the vision + the
will to protect and preserve
the natural beauty of Pebble Beach.

SAVE THE TOBACCO

NAME	ADDRESS	E. MAIL	PHONE
Nora Speckelmeier 	3077 Stevenson Dr. Pebble Beach, CA 93953	Norahymn12@gmail.com	831-373-5292
Rebecca J. Bare 	3081 Stevenson Dr P.B. CA 93953-2822	BeckB6E0@gmail.com	913-221-7773
Clyden Clarke 	3077 Stevenson Dr Pebble Beach, CA 93953	ClydenClarke@hotmail.com	831 373-5292
Destiny Marie 	2889 Galleon RD. Pebble Beach CA 93953		(831)917-4770
Dax Longway 	3077 Stevenson Dr. Pebble Beach, CA 93953		(775) 815-0616

SAVE THE FOREST

Jill Leach 3100 Mastros Dr leachlinks@aol.com 831-646-1066

MIKE LEACH 3100 Mastros Dr. 831-646-1066

JASON LEACH 3100 Mastros Dr 831-646-1066

Christian Longway 3077 Stevenson Dr. 775-997-5025

Charles Bare 3081 Stevenson P.B. 831-375-1286
913-205-1627

SAVE THE FOREST

Jim Keenan	3013 Sloan RD	—	Save the Forest
Patricia C. Shaughnessy	3042 Sherman Rd. P.B.		
Anna (Gud) Kelly	3043 Sherman RD PB (physical Address)		Need more data on water, traffic, wildlife, children's safety, tree removal
Roberta Long Hestman	3255 Sherman Rd Pebble Beach CA		Reluctant to move where destruction of trees + wild habitat must be necessary
John Lee Coble Beach	3012 Sherman RD		" "

environmental
Impact.

SAVE FOREST

Devon Wilton	3067 Sherman Road		Save the Forest
Giorgio D'ambrosio	3119 Middleland PB		Save the forest + rare flowers
Mauricio D'ambrosio	3119 Middleland Road PB		Save the forest
JAMES HAD JA	3125 MIDDLE RANCH RD PEBBLE BEACH		SAVE THE FOREST
DAN SEHRADSE DSE	3092 SLOAT RD PEBBLE BEACH		SAVE THE FOREST

Christine Paim 3039 Sisset Rd. Pebble Beach, CA	Christine Paim		Save the Forest
Dr. & Mrs Michael H. Kean 3040 Sisset Road Pebble Beach	Michael H. Kean		Save the forest
The Youngs 1086 Trappers Trail Pebble Beach, CA	D Youngs		Save the Forest
Hugh Nowell 1079 Trappers Trail PBBU	Hugh Nowell		NO more building SAVE the forests
DEL & JANICE LOMB 3027 SHERMAN RD PEBBLE BEACH	DEL LOMB		SAVE OUR TREES

SAVE THE FOREST

Alan Huey	3019 Sherman Rd	ashuey@sbcglobal.net	831-238-7663
Walt Bennett	1076 Trippers Trail	walt.bennett01@gmail.com	831.521.9373
KENT JORDAN	1074 TRIPPERS TRAIL	KentwJordan@yahoo.com	831-238-5727
BRIAN Hein	3041 Bird Rock Rd	brianhein58@gmail.com	8319159123
MARY ALIOTTI			915-9585

SAVE THE FOREST

NAME	ADDRESS	E MAIL	Phone
Mziwan Zaweihid Mziwan Zaweihid	1147 Mestres Pebble Beach	MZaweihid@gmail.com	310 903 3333
Karen Snow Karen Snow	1141 Mestres Dr Pebble Beach	Karensnowpb@aol.com	831-375-5220
Wayne A Snow Wayne A Snow	1141 MESTRES DR PEBBLE BEACH		831-375-5220
Mark Weber Mark Weber	3079 EL MESA Rd Pebble Beach	webamakoto@yahoo.com	831-204-0606
MICHEL DAVELAS	1102 S OY GLASS WOODS DRIVE PEBBLE BEACH	DAVELAS@COMCAST.NET	831-77-5993

SAVE THE FOREST

NAME	ADDRESS	E. MAIL	PHONE
Tom Schreff 16 St	3065 B 1 Rd Red Pebble Beach, CA	TSchreff@ CIGinsurance.com	831-641-9831
Marie Schreff C	3065 Pebble Beach Pebble Beach	m.schreff@hermail.com	831-236-4892

SAVE THE FOREST

Bob Thomas

3112 Stevenson Dr
Pebble Beach CA
93953

Barbara Reding

3080 Sloat Rd.
Pebble Beach CA
93953

Jean Stumbo

3084 Sloat Rd.
Pebble Beach, CA
93953

831-649-4039

Ann McBride

305 Spruickery
Hill Rd
Pebble Beach CA 93953

Cindy VanHoolegen

3149 Bird Rock Rd

Cindy VanHoolegen

Pebble Beach CA
93953

Gene Vanz Hoolegen

3149 Bird Rock Rd.


Jean Stumbo

Pebble Beach CA
93953

SAVE THE FOREST ! Petition to move affordable housing (APARTMENTS)

NAME	Street Address	email	Phone.
JENNIS DEIS	3083 SLOAT RD	—	831-372-7676
Sheila Deis	3083 Sloat Rd. P.B.	smdeis@gmail.com	831-372-7676
Mary Ann Wood	3087 Sloat Rd P.B.	None	831-649-3717
Rita Linnell	1122 Mestros Pr Pebble Beach	atweedt@AFT.NET	
Barbara Kooling	3080 Sloat Pebble Beach	repeat —	
Paul Rho	3088 Sloat Rd Pebble Beach CA	—	

SAVE THE FOREST

NAME	ADDRESS	EMAIL	PHONE
Mary Muller	3031 Sloat		647-9384
Callum Gilchrist	3017 Sloat	cgilchrist93@gmail.com	657-9584
Jennifer Ugarz	3003 birdrock rd	jlungo3@gmail.com	601-8495
Nichole Luong	3003 bird rock rd	babygreeneyes2@gmail.com	241-0790
Lisa Ledin 	3075 Hermitage Rd.	lisaledin@att.net	831 236 0197

SAVE THE FOREST

NAME	St. Address	Email	Phone
Fred Hartzell	3015 Sherman Rd P.B., CA 93953		831-372-4912
MIKE DEPAOLA	1141 Wildcat Cyn PB 93953		831-641-0891
Amy DePaola	1141 Wildcat Cyn Pebble Beach, CA 93953		831-641-0891
Bill Sy	1206 W. Jenkins Way PB 93953		831-324-4846
Cole Clark	1203 Bamboo Pl. Pebble Beach, CA 93953		831-250-7871
Astra Pridelberger	613 Bamboo Pl. Pebble Beach 93953		(209) 588-3034

NAME	STREET ADDRESS	E. MAIL	PHONE
Marta Self	1206 Hawkins Way	mantaherself@gmail.com	925 683 0379
LINDA BANK Linda Bank	3146 STEVENS AVE PEBBLE BEACH CA 93953	N/A	N/A
SUSAN ROGAN Susan Rogan	3145 Stevenson Dr Pebble Beach CA 93953	SUSAN.ROGAN@ATT.NET	831- 233 8915
SEUMAS ROGAN	3145 Stevenson Dr Pebble Beach CA 93953	N/A	831 233-8916
Nancy Callahan	1246 Indian Village Rd. Pebble Beach CA 93953	Lik	831 373-8280
SILVANO FERRIS July Ferris	314 Tejon Place Palms Verde Estate CA 90274		310 - 373 4100
Janet Wilson Janet Wilson	3015 Sherman Pl Pebble Beach CA 93953	N/A	831 392 4112

Comments
Same to
Forest.

SAVE THE FOREST

name	address	email	phone
W Bryson W Bryson	1125 Wildcat Canyon Rd PB 93950	—	
John Cecil	3078 Strawberry Hill PB	—	
Tom Coyle			
Denise Sweeney	3078 Strawberry Hill Pebble Beach Ca 93953	—	
Sweeney			
Matt Vanderburg	1080 Lariat Lane Pebble Beach, CA 93953	—	
Hunter Eudridge	1081 Lariat Lane Pebble Beach CA 93953	—	




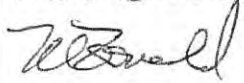
SAVE THE TREES

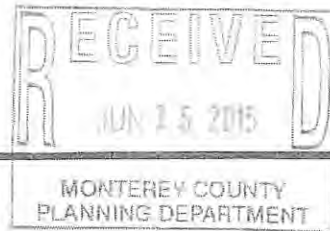
NAME	Street Address	e mail	Phone
ROBERT BROOKMAN RM BROOKMAN	3001 SLOAT RD PEBBLE BEACH CA 93953	RMBROOKMAN@ ME.COM	831-645-9616
Jean Killackey	3600 Aztec RA Pebble Beach	jean@ jkillackey.com	834-242-8959
CHRIS BROWN	1114 Nestles Dr Pebble Beach	cbrown007@ me.com	831 917 2998
Elison Burlington			
Solenne McQueeny	3067 LARKIN RD		373-5214
Tuesday Pahlisch	3031 HAWAIIAN WAY HAWAII	tuesdaypahlisch@ yelp.com	649-6074

SAVE THE FOREST

Dette Meyer	3056 Parker		
Michael Smith	3032 SLOAN RD		
Casslyn Logan	2969 Bird Rock Pebble Beach Rd	birdrock@yahoo.com	(831) 655-2969
Cathy Bergenquist	3029 Cormorant Pebble Beach Rd.	Bergiestt@sbsglobel.net	
Michael Logan	2969 BIRD ROCK 93353	birdsoaroad@yahoo.com	831-655-2969

SAVE THE FOREST

NAME	ADDRESS	E-MAIL	PHONE
Russell Jandrisevits 	3059 AZTEC RD PEBBLE BEACH, CA	EJANDRIS@BAOL.COM ALSO OBJECT TO ADDED PROPERTIES WITH SUCH AN EXTREME WATER SHORTAGE	(725) 209-9071
EILEEN JANDRISVITS 	3059 AZTEC RD PEBBLE BEACH, CA	THERE IS NO WATER TO SUPPORT MORE HOUSING AT THIS TIME. WE CANNOT WATER OUR LAWNS AND THERE IS A DROUGHT. WAKE UP!	(925) 209-9071
BOB SPARKS 	3059 SLOAT RD PEBBLE BEACH, CA	—	(831) 372-8294
Law Decker	1139 Mestres Pebble Beach		831-646-9793
Marie Zuehlid 	1147 Mestres Drive Pebble Beach	mariezuehlid@gmail.com	310-903-1479



Friedrich, Michele x5189

From: janet pampuro [jpampuro52@gmail.com]
Sent: Sunday, June 14, 2015 6:57 PM
To: ceqacomments
Subject: Response - Pebble Beach Company Inclusionary Housing Project (RMA-Planning File No. PLN130447)

The point of the CEQA required Environmental Impact Report process is to determine if there are alternative locations where a project's objectives can be more or less met, but where less environmental damage would occur.

I believe that Alternative Site 2, Sunset and 17 Mile Drive located in Pacific Grove, meets the above objective and contains the highest and best use for inclusionary housing related to the Pebble Beach planned development. As the DEIR states, this site meets 4 out of 5 objectives that were investigated. The main constant significant negative impact throughout this process and in Monterey County continues to be the supply of water and demand and the fact that we are now in a drought situation with water rationing beginning to be set for this area. Alternative Site 2 is zoned C-2 Heavy Commercial District, which allows residential use with a use permit. The property is in Pacific Grove but is owned by the Pebble Beach Company. The area has been previously fully disturbed and would not have most of the environmental impacts of Area D including the destruction of trees and disruption of sensitive wildlife. The Pebble Beach Company may still be allowed to build single family residences in Area D which is consistent with existing zoning in the area. There was a small gas station area on part of the Alternative 2 site and tanks would have to be removed but this is something that occurs regularly when gas stations are converted to other uses and there are companies that specialize in this type of tank removal project.

If the inclusionary housing were placed in Area D, the tenants would be out in an unincorporated area of Monterey County called Pebble Beach that has no City government or organized town atmosphere, including shopping, public schools, recreation, restaurants independent of a resort or golf course, no library, or a variety of gas stations and banks, together with many other disadvantages that would not lead to a full and safe manner of living. The location of Alternative Site 2 has the status of being owned by the Pebble Beach Company which they have indicated they prefer in this development. The former businesses on the Alternative Site 2 have been closed down for a number of years and the property appearance from the street is not pleasant. The development of the proposed inclusionary housing on this site would much improve the appearance of this area from what it has been. The proposed architectural design is also very similar to the 17 Mile Drive Village Apartments just one block away at 17 Mile Drive and Sinex in Pacific Grove so it would fit very well with existing housing in the area.

There are no public schools in Pebble Beach and therefore the closest schooling for the tenants will be in Pacific Grove. It makes more sense to have the tenants live where they will be utilizing the schools and other things related to their children's learning and activities. At Alternative Site 2 the tenants will be much closer to all city services and more able to live their lives comfortably and to establish relationships with friends in Pacific Grove. In order for friends and family to visit the tenants in Pebble Beach the tenants would have to call the Pebble Beach Gate and provide information about anticipated visitors and get permission for entrance. This is not always an easy situation to deal with and it would be much easier for this group of tenants not to be required to live with this kind of situation in their lives.

The Alternative Site 2 is near both the Spanish Bay and Country Club Gates for Pebble Beach and therefore all Pebble Beach employees could easily enter the Pebble Beach area for their work.

The Alternative Site 2 is very close to an elementary school and the high school and the middle school is a little further but still walkable or a short drive. The City recreational areas are also very close by. Washington Park is a little bit over a block away and the Asilomar Beach is just west a couple of blocks. Areas for organized sports are also very close by. I lived with my husband and son at the 17 Mile Drive Village Apartments when we first moved to Pacific Grove almost 20 years ago and that area is a great neighborhood!

There is currently no inclusionary housing in this area. I think we need to be considerate of the location of the inclusionary housing so that the tenants will get the best housing experience that can be provided and not one complicated by being out in the forest where it may be dangerous to walk to school or to other Pacific Grove city services as needed and which would limit the tenants ability to be part of a true community as opposed to an unincorporated area of the County called Pebble Beach. All City services such as emergency services would also be much easier to provide to the tenants if they were located in Pacific Grove. The consideration of the people who would be utilizing the inclusionary housing for this project should be our Number One

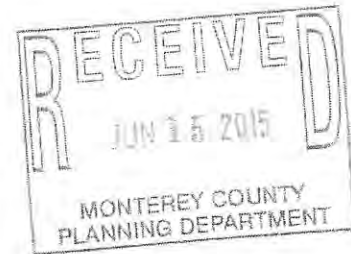
consideration for this development and I believe that utilization of the Alternative 2, 17 Mile Drive and Sunset Drive, located in Pacific Grove will satisfy that consideration and most other objectives considered for the sake of the tenants and all involved. Alternative Site 2 is definitely the site that would avoid or substantially reduce many of the significant negative effects of the project that have been investigated and would therefore enhance the living experience of the tenants.

I would deeply appreciate the Monterey County Board of Supervisors serious consideration and choice of Alternative Site 2, 17 Mile Drive and Sunset Drive in Pacific Grove, as the building site for the inclusionary housing project as referenced above.

Thank you for your serious consideration of this matter in making your decision on this most important matter to our County.

Sincerely,

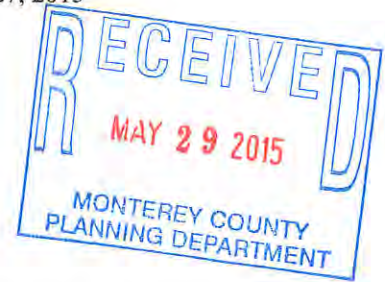
Janet Struve Pampuro
P.O. Box 51146
Pacific Grove, CA 93950
831-238-0067
jpampuro52@gmail.com



May 27, 2015

To: Joseph Sidor, Associate Planner
Monterey County Resource Management Agency – Planning
sidorj@monterey.ca.us

From: Hana Pariser, concerned citizen
jhpariser@aol.com; 831 915-6245



Re: Response to the DEIR about Inclusionary Housing in Area D, Pebble Beach

The DEIR found 2 impacts SIGNIFICANT. Please, state what is to be done about this? Surely you cannot just state that an impact is significant and do nothing about it!

1. **Water:** “Given the uncertain nature of regional water supplies, it [the Project] would be a significant and unavoidable impact.”
Let’s say that it would be a crime committed against future generations.
It is hard to believe that in times of serious drought in California, PBC has water entitlements and sees nothing wrong in using them while others on the peninsula are being asked to let their lawns wither and die, not take baths and to flush toilets sparingly.
PBC’s help in building a recycled water system, which supposedly earned them these entitlements, is undoubtedly a very noble act, were it not motivated by a desire to build more houses. The serious impact of lack of water is avoidable; we must not allow more irresponsible development!

2. **Traffic:** “More traffic would be added [by the Project] to roadways and intersections already operating at unacceptable levels...”
If something is found “unacceptable” at present state, should we continue to build and make it worse? We must also keep in mind that it is not just the roadways near the project that will be affected. One has only to look at the traffic all over the peninsula at 5 pm.

There is one additional point I wish to address, namely the blackmail approach of the PBC presented in the DEIR, along with subsequent math inaccuracies.

The report states: “If the 24 inclusionary housing units are not constructed as proposed, Area D could be developed with up to 31 market rate units.” So, the PBC will punish the residents of area D by building 31 residential units and still build the 24 inclusionary units somewhere else. The math does not add up. What is the “final build up” approved in the Del Monte Forest? Is it 100, as we have been led to believe, or 131, or??? The numbers are also wrong regarding water entitlements. The report says that the PBC has 52AF left, so building 31 houses in addition to 24 units would bring the number to 55, thus, 3 AFs too many.

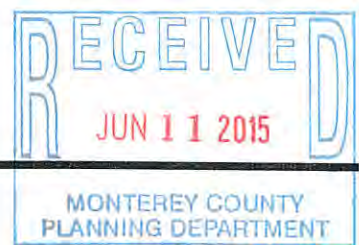
The blackmail gets even worse if there were to be no Project and the PBC would have to pay the in-Lieu-Fee. In consequence: no Old Capitol site for Monterey County, 31 houses in Area D, and inclusionary units elsewhere in Monterey.

Afraid of the 31 houses in Area D, the authors of the report discard their own choice of “Environmentally Superior Alternative, [Alternative 4], when considering only the inclusionary housing”, as well as all other options proposed by the public. Due to this new threatening appendage regarding the Area D build out, the Report concludes that the only option left is building 18 units in Area D. The blackmailing worked!

In conclusion, the planners must:

1. Answer what will be done about the **significant** factors of water and traffic?
2. Address the number inaccuracies concerning the final build out in Del Monte Forest and the water entitlements.
3. Clarify why Area D is now considered a primary area for development when it was originally designated as a green belt. (Some of us still have the signs posted there by PBC). Explain why the PBC continues to be allowed to cut down Monterey Pine and California Oak in the Del Monte Forest, when these symbols of Monterey and California, respectively, are PROTECTED even on private property! Deforestation, too is a crime against future generations.

Gonzales, Eva x5186



From: Nancy Parsons [nancyparsons29@gmail.com]
Sent: Thursday, June 11, 2015 4:40 PM
To: ceqacomments
Subject: Pebble Beach Company Inclusionary Housing Project Draft Environmental Impact Report

The state of California is in a prolonged drought. Mandatory water rationing has been required by Governor Brown. The Carmel River and the Seaside Aquifer are oversubscribed and Cal-Am is required to cease all extractions beyond its legal rights by 2016. Citizens of the Monterey Peninsula have been asked to substantially cut their use of water. How can a project of this size be considered under our current drought conditions?

The streets in the Del Monte Park neighborhood dead-end where the inclusionary housing project will begin. Currently neighborhood children play on those streets as there is no traffic other than the people that live on the street. I am very concerned that traffic will change those quiet streets due to increased parking of visitors who will walk through to the housing project rather than drive through the Pebble Beach gates. Also, many of the streets are in disrepair and ill equipped to handle increased traffic and there are no sidewalks which will make foot traffic dangerous.

Emergency evacuation is another issue that has me very concerned. Being that there are only two main roadways onto the peninsula (Highway 68 and Lighthouse), how would people exit the peninsula if there were a natural disaster? The Del Monte Park neighborhood and Pebble Beach are considered to be in a high fire danger area. What would the exit route be if all the roads were congested with traffic?

Finally, I would like to know why the property that belongs to Pebble Beach on the corner of Sunset and 17mile drive and also the Mission Linen site on the corner of Sunset and Congress are not being considered as better sites? Both are already commercially zoned, trees would not have to be cut and both areas are in close proximity to stores and schools.

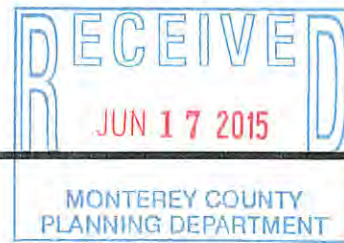
I would very much appreciate a response to all my concerns.

Thank you very much,

Nancy Ponedel Parsons
1130 Miles Ave.
Pacific Grove, CA 93950

After reading the draft environmental impact report it is apparent that the project is not feasible. There are two issues that are significant and unavoidable as expressed in the report. These issues would have harsh consequences for the Del Monte Park neighborhood as well as Pebble Beach homes situated close to the project.

Sidor, Joe (Joseph) x5262



From: Elliot Rubin [e.rubin4@gmail.com]
Sent: Wednesday, June 17, 2015 1:27 PM
To: Sidor, Joe (Joseph) x5262
Subject: Comments on Draft Environmental Impact Report (DEIR) Pebble Beach Inclusionary Housing

June 17, 2015

Mr. Sidor,

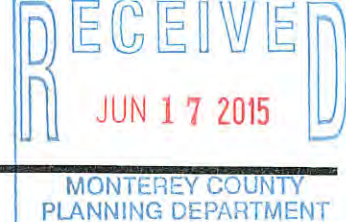
Thank you for an opportunity to comment on the Pebble Beach Inclusionary Housing Project Draft Environmental Impact Report. As residents and homeowners in the Del Monte Park Neighborhood, we are concerned about the potential impacts of this project, and we do not believe that the Draft EIR adequately addresses all of them. For example, the Draft EIR fails to mention the impact on parking in the Del Monte Park Neighborhood. More specifically, parking on the 1300 blocks of Lincoln, Miles, Lawton, Shafter and Funston. A lack of parking already exists on these blocks, and the proposed development will only make the problem worse. These streets are easily accessed from Highway 68, and we are concerned that visitors and residents in the proposed development will choose to park on these blocks and walk through in order to avoid driving around and passing through the Pebble Beach Gate. This will save them time and the inconvenience of stopping at the gate. In addition to heightening the parking issues on these blocks, it will greatly increase both car and pedestrian traffic, which in turn will increase noise. We decided to purchase a home on the 1300 block of Lawton in part because of the benefits of living on a quiet, safe and traffic free cul-de-sac. Additionally, we purchased our home so that we could live close to a forested green belt, which we believe would be a shame to destroy. We strongly agree with the City of Pacific Grove's recommendation that the Pebble Beach property at the corner of 17 Mile Drive and Sunset Avenue should be considered as the primary location. This property is already deforested, currently an eye sore, and is also located close to many of the same amenities as Area D. Additionally, the site is located very close to several of the Pebble Beach Company's Corporate facilities (HR office, Regional Distribution Center, Sales & Reservations Office, Spanish Bay, etc.) and would provide quick and easy access to work for employees.

Sincerely,

Elliot and Lauren Rubin

1315 Lawton Avenue, Pacific Grove, CA 93950

Gonzales, Eva x5186



From: Ann Schrader [schraderann@sbcglobal.net]
Sent: Tuesday, June 16, 2015 10:44 PM
To: ceqacomments
Subject: PLN130447 - Pebble Beach Company Inclusionary Housing Project Draft Environmental Impact Report
Attachments: SchraderDEIRresponse.docx

June 17, 2015

Ann Schrader
1222 Lawton Ave.
Pacific Grove, CA 93950

RE: PLN130447 - Pebble Beach Company Inclusionary Housing Project Draft Environmental Impact Report

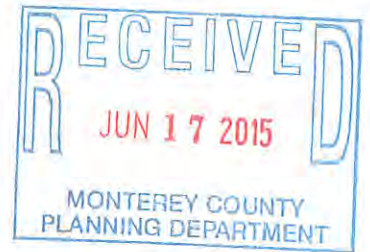
Mr. Sidor,

The attached questions, comments and suggestions are offered to improve the Draft EIR.

Sincerely,
Ann Schrader

June 17, 2015

Ann Schrader
1222 Lawton Ave.
Pacific Grove, CA 93950



RE: PLN130447 - Pebble Beach Company Inclusionary Housing Project Draft Environmental Impact Report

Mr. Sidor,

The following questions, comments and suggestions are offered to improve the Draft EIR:

Chapter 5, Alternatives

1. The Area D buildout is not identified as a condition of the Project, this DEIR analysis appears to be relying on the possibility of an Area D buildout, the Area D buildout needs to be made a condition of the Project if that's the basis for your conclusions.
2. Why are you not taking into consideration the advantageous environmental impacts of infill development as applied to the 17 Mile Dr. and Sunset and the Collins Residential sites? The Monterey County General Plan recognizes the need to consider infill. Policy LU-1.9 of the Monterey Co. General Plan states *"Infill of vacant non-agricultural lands in existing developed areas and new development within designated urban service areas are a priority. Infill development shall be compatible with surrounding land use and development."*
3. Would an EIR be required for a 31 unit buildout project of Area D? If so wouldn't development in Area D have a greater negative environmental impact than development in most other areas owned by the PBC due to the number of trees required to be cut down there? Please provide an inventory of all property owned by the PBC in the Greater Monterey Peninsula Planning Area that's zoned residential? Please do a comparison of the environmental impacts on Area D and the potential alternative sites for future housing development within the Greater Monterey Peninsula Planning Area. Why have you concluded without the above analysis that an Area D buildout would be an environmental superior alternative for a future PBC housing development project?
4. Please consider in the EIR the possibility that in the future situations will arise that will prevent the aforementioned 31 unit development of Area D. For example, continued drought and lack of water supply causing restrictions on new housing permits. If the water district fails to cease over pumping of the Carmel River by the state mandated deadline of 2017 and daily fines of \$23,000 (about \$8.4 million per year) are imposed it's likely that there will be a moratorium or rationing of new water permits. Another possibility is Gov. Brown will increase the mandatory

water rationing to cities and water districts. Also please consider the possibility that continued endangerment of the Monterey Pine Forest from development, habitat fragmentation, disease, drought, genetic contamination, etc. could cause more stringent rules against destroying the Monterey Pine and the Monterey Pine habitat. See the Monterey Herald article, dated 05-16-15, in which it was noted that *"The effects of the drought are weighing heavily on Monterey pines and coastal live oaks, causing them to die in numbers not seen here in recent memory, say local experts"*. www.montereyherald.com/environment-and-nature/20150515/drought-leaves-monterey-peninsula-trees-vulnerable . Another possibility is a federal listing of the Monterey Pine, the Monterey Pine habitat, or other plant or wildlife species as protected could cause Area D to become protected. I contend the premise that we should develop Area D now because it **might** be developed sometime in the future is invalid for any number of reasons, several of which are listed above. This indeterminable premise has biased the DEIR and could cause a forest and wildlife habitat to be destroyed when it might otherwise be saved.

5. It's possible that sometime in the future Area D could be included in the coastal zone. There is precedent for that happening as some or all of the Navajo tract in the Del Monte Forest was previously not in the coastal zone and is now included. If Area D were to be included in the CA Coastal Zone then the likelihood of Area D being developed decreases dramatically. Please factor this possibility into the DEIR analysis.
6. Why are the Project Site and the proposed alternative sites not being reviewed purely on their inherent environmental impacts, instead of on unsupported suppositions of possible future events?
7. Did the supposition of a future 31 unit development originate from a statement by a representative of the Pebble Beach Co.? Is the Pebble Beach Co., a for profit company, being allowed to bias this report with comments not necessarily motivated by the environmental impacts of the project? If statements from representatives of the Pebble Beach Co. have been considered, please also consider the statements from the Pebble Beach Co. that there will be **no further development** in Pebble Beach after the current Pebble Beach buildout project. See Paul Rogers' Mercury News article in which Peter Ueberroth, one of the Pebble Beach Co. owners, is quoted as saying "And if the Coastal Commission, and then Monterey County, approves the latest plan, they will be finished with development forever". www.mercurynews.com/ci_20551316/after-years-battles-truce-may-be-near-at . Also see the Pebble Beach Co. website which states "These 90 estate lots are the last ones that Pebble Beach Company will develop in Pebble Beach". <http://thepebblebeachlots.com/>
8. Please clarify, if the current Pebble Beach Build-Out Project is the final build out as widely advertised then why is the DEIR considering the possibility of an additional future 31 unit development?

9. I believe the assumption that we need to destroy this forest now because it **might** be destroyed in the future is a fallacious argument and can and will be debated from a legal viewpoint. Please provide the legal basis for this assumption.
10. Please provide hard fact vs conjecture that there will be a future 31 unit Area D buildout. If hard facts cannot be provided supporting the supposition then please strike all references to a possible Area D buildout and analyses based on that possibility. This supposition has biased this DEIR.
11. Please explain why the DEIR is including a possible future Area D buildout in the environmental impacts for each of the alternatives when a future Area D buildout is far from a foregone conclusion and doing so changes the results of two of the alternatives, the 17 Mile Dr. and Sunset site and the Collins Residential site, from the two most environmentally superior sites to environmentally inferior sites.

Chapter 5, Alternatives

Page 5-52

12. How can alternative sites which have been previously deforested (alternatives 2, 3, and 4) be considered environmentally inferior alternatives compared to the proposed project site where hundreds of trees would be cut down?

Chapter 3, Environmental Setting, Impacts, and Mitigation Measures

Section 3-3 Biological Resources

13. Please consider "Monterey Pine Forest Conservation Strategy Report" by Jones & Stokes Associates, Inc. 1996. On page 1-5 it states "The association between geomorphic surfaces and Monterey pine forest is used in this study as an indicator of forest diversity. High priority is given to conservation of representative and sustainable stands of Monterey pine forest on each of the geomorphic surfaces. The assumption is that preservation of the greatest diversity of Monterey pine forest across geomorphic surfaces will ensure the greatest diversity of forest subtypes, species, and genetic variation within species." On page 2-2 it states "Geomorphic surfaces with greatly reduced extent (80% or more loss) of Monterey pine forest from historical distribution are middle-aged dunes, oldest dune, marine terrace 2, marine terrace 3, and marine terrace 4 (Table 9)."
Please consider the preservation of the Monterey pine forest on the marine terrace 3 geomorphic surface taking into consideration the cumulative loss including recent development

projects since 1996 and pending development such as the current Pebble Beach Build-Out Project.

14. The proposal has the potential to significantly alter and further degrade the site's environmental setting and I disagree that the significant impacts to the special status species can be reduced to less than significant levels with mitigation. The proposal will significantly impact a number of special status species, both wildlife and plants, under both the California Fish and Game Code and Federal Environmental Species Act. As shown on Table 3.3-3 (Special-Status Species Potentially Present at Project Site), species potentially impacted include Monterey Pine, California red-legged frog, Cooper's hawk, Sharp-shinned hawk and White-tailed kite to name a few. Although degraded, the site is habitat for a number of species and if managed properly has potential to become a higher quality habitat area. Additionally, the development further fragments existing habitat area and will further interfere with wildlife movement. Please revise the Draft EIR to address the impacts to the special status species caused by the systematic removal of forested areas in the vicinity of the project site, including the parking lot at the corner of Congress Avenue and 17-Mile Drive, recent single-family development along Congress Avenue in the last decade, and any other pipeline projects.

Section 3.10 Public Services and Utilities

Existing Transit/Transportation Services

15. The subject site is poorly served by Monterey-Salinas Transit. Currently there are two buses, Route 2 and Route 21, which are proximate to the site and have limited headways. Section F, Impact TRA-F1, inadequately addresses the lack of practical transit options for residents. The residents may work in other parts of Monterey County and rely on transit services to commute. The EIR does not adequately address this issue, nor does it propose mitigation. Please revise the Draft EIR section on transit to more comprehensively address the possibility of residents commuting to other job centers in Monterey County, and include mitigation measures to increase bus headways in order to make transit a viable transportation option for residents.

Sincerely,

Ann Schrader

Sidor, Joe (Joseph) x5262

From: Cam Schure [cms3388@sbcglobal.net]
Sent: Sunday, May 24, 2015 11:04 AM
To: Sidor, Joe (Joseph) x5262
Subject: Response to the DEIR about affordable housing in Area D, Pebble Beach

Please respond to the following problem with the DEIR.

Alternative 2 – Sunset Drive/17-Mile Drive (line 24, page 5-19)

Alternative Characteristics (line 25, page 5-19)

24 inclusionary Housing Units at Sunset Drive/17-Mile Drive (line 26, page 5-19)

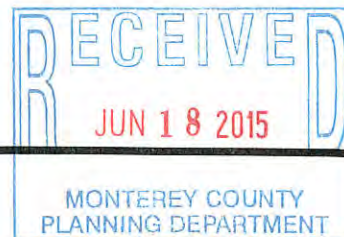
This alternative does not encroach on the coastal zone and is zoned C-2 which can be adapted to residential use with a use permit. (lines 30-36, page 5-19)

The claim that there would be a possible build out of 31 residential units in Area D (lines 11-12, page 5-20) if this alternative site were selected is disingenuous at best given that the final build out already includes a commitment of 90 units of the possible 100 residential units available. This would imply that the final build out is either, in reality, 131 residential units or that 31 of the 100 residential units would be reserved for a build out in Area D. This assertion is either incorrect and must be corrected or disregarded as a red herring fallacy in reasoning. At a minimum, this inaccuracy or erroneous assertion must be corrected and removed from the DEIR or corrected to state that there are a potential of 131 residential units, not the total stated of 100 residential units, or the “final build out” is not really the final build out.



Cam Schure

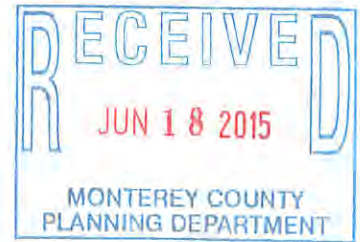
Gonzales, Eva x5186



From: Gloria Shaffer [gloria.shaffer@sbcglobal.net]
Sent: Thursday, June 18, 2015 10:18 AM
To: ceqacomments
Cc: Sidor, Joe (Joseph) x5262
Subject: Letter on Draft EIR 6-17-15.pdf
Attachments: Letter on Draft EIR 6-17-15.pdf; ATT00001.txt

Enclosed are my comments re the DEIR and project PLN 130447. Thank you. Gloria Shaffer

Gloria J. Shaffer
1163 Arrowhead Road
Pebble Beach, CA 93953
gloria.shaffer@sbcglobal.net



June 18, 2015

To Whom it May Concern:

I am writing in response to the Draft Environmental Impact Report (DEIR) that has been prepared in connection with the Pebble Beach Company Inclusionary Housing Project ("Project")(File Number: PLN130447). There are several ways in which the DEIR fails to adequately consider the Project's negative impact on the environment and the viability of proposed alternatives.

Transportation and Circulation: The DEIR finds significant and unavoidable environmental impacts on transportation and traffic circulation both during construction and once the Project is occupied. The DEIR notes that the Project would "add vehicular traffic...that would worsen existing unacceptable levels of service and for which the cumulative impact has been identified as significant and unavoidable." (ES-4.) The DEIR recognizes that the mitigation measures proposed are inadequate and that impacts would remain significant even if these measures were implemented.

The mitigation measures require Pebble Beach Company to make a payment to Monterey County (described as a "fair-share contribution") to help finance remedies to area traffic concerns. However, there is no local or regional traffic improvement plan in existence that aims to address the current unacceptable conditions in the Project area, nor one designed to address the increased congestion that would be caused by the Project. Therefore, it is expected that any payment of fees would be used by Monterey County for other, higher-priority projects that are already approved, and would have no positive impact on the traffic congestion created by the Project.

Water Supply and Demand: In this time of extreme drought, the Project's increase in water use compared to existing conditions is untenable. Regional water supplies are uncertain and providing water to the Project would intensify regional water shortages. The DEIR takes note of the need for the development of new regional water supply infrastructure to serve both existing demand as well as the increased demand from the Project, but the DEIR does not recognize that any such development is uncertain and at best years away from coming on-line. In addition, new regional water supply infrastructure will likely have its own significant and unavoidable secondary environmental impacts and the Project would contribute to the need for such infrastructure. (ES-6.)

Viable Alternatives: The DEIR recognizes several viable alternatives, including some that would result in building inclusionary housing elsewhere. Several of these alternatives were deemed feasible, were found to achieve most if not all of the Project's objectives, and would minimize significant environmental impacts of the Project. The DEIR rejects each of these alternatives based on an assumption that if the Project were not sited in Area D, 31 other housing units would be developed there because Area D contains property that is zoned for market-rate housing.

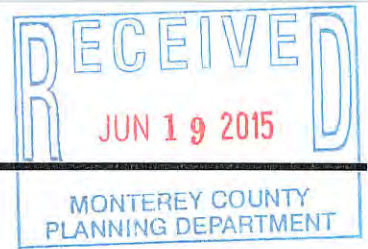
The rejection of these alternatives on this basis is mistaken. Potential development is not equivalent to planned development. The DEIR does not study whether the market exists for additional single family homes in this area and any assumption to that effect is very speculative. Currently, there are many homes in the area for sale, including those that have been on the market for months, indicating low demand for such housing. Given this current inventory, it is unlikely that all 31 units would be built. To the extent any are built, it would be over the span of many years. During the interval, regional planning for addressing traffic congestion and demands for water supply could be undertaken, allowing for true mitigation of the significant impacts identified in the DEIR.

The alternatives should be further studied and considered. Creating affordable housing is an important goal that should be achieved in a way that mitigates the negative impacts on the environment, existing neighborhoods and residents.

Thank you for your consideration of my concerns.

Sincerely,

Gloria J. Shaffer



Gonzales, Eva x5186

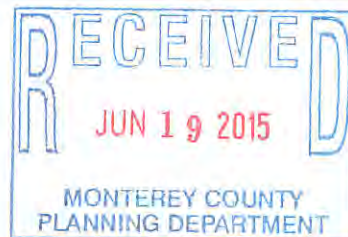
From: G Souza [gsouza6980@hotmail.com]
Sent: Friday, June 19, 2015 10:41 AM
To: ceqacomments
Subject: DEIR PLN130447
Attachments: PLN130447- SCH#2014081052-PB Inclusionary Housing Project DEIR.doc

Hello,
attached is a letter with my comments on the DEIR for Pebble Beach's inclusionary housing project.
Please confirm your receipt of the attached one page legal sized letter.

Thank you,
Grace Souza
1333 Lawton Ave.
Pacific Grove, CA 93950
831-402-1913

June 18, 2015

Joseph Sidor, Associate Planner
Monterey County Resource Management Agency – Planning
168 W. Alisal St., 2nd Floor Salinas, CA 93901



RE: PLN130447; SCH#2014081052 – Pebble Beach Company Inclusionary Housing Project Draft Environmental Impact Report

Mr. Sidor,

Thank you for considering our community concerns regarding Pebble Beach Co's Inclusionary Housing project. I live in a home which is located very near the proposed project site. The Draft EIR lists many "Significant and Unavoidable Environmental Impacts" as well as those deemed "Less than Significant", for which I have great concern.

Section 3.1 Aesthetics

Visual Character of the forest would be greatly diminished with the introduction of a two story, multi unit complex. A large number of trees will be taken down for this proposed project, and the lighting from such a condensed multi unit community will add to light pollution in an area, where it is now dark.

Figure 3.1-1 indicates that there will be 67 total parking spaces, all located within the site, in the area directly adjacent to Pacific Grove neighbors. There will be light emitted from the headlights of numerous cars, as well as the noise that comes from the "beeping" of cars when they are locked.

The greatest Aesthetic impact can be seen in Figure 3.1-10. Where the forest canopy produces a now dark area, would be opened up to vast lighting.

The forests abutting Pacific Grove are being removed for the benefit of Pebble Beach Co., without much regard for their neighboring communities. This has a significant impact on us neighbors, as we experience the deforestation.

Section 3.11 Transportation and Circulation

Highway 68 and Lighthouse Avenue, the two arteries to and from Pacific Grove, is subject to great congestion in the morning commute hours and again in the mid afternoon. The project will add to this congestion. There will be degradation of the roads to and from the proposed site, for which who will be financially responsible? The Draft EIR does not adequately address these issues.

Most areas of the Del Monte Park in Pacific Grove, do not have sidewalks. When the houses in Pebble Beach, adjacent to David Avenue, were built, shrubs were planted along David Avenue instead of a sidewalk. The children that walk to school do so in the street. Persons walking to nearby bus stops, do so in the streets. The Draft EIR does not adequately address the safety of the resident's of this multi-unit complex.

Section 3.12 Water Supply and Demand

The Monterey Peninsula does not have adequate water supply for this proposed project. The term "water entitlement" does not produce any more water. The proposed project places a burden on an already low water supply.

Chapter 4 Alternatives

The Draft EIR addresses the building objectives of the Pebble Beach Co. The draft EIR should include not just Pebble Beach's objectives, but the objective of conserving our old growth forests, selecting a site in a neighborhood with similar multi unit structures, and is safer for the resident pedestrians who will reside in the project. Del Monte Forest is an area of single family houses. There are no such structures as the multi structure, multi unit housing being proposed for Area D.

Thank you for hearing my concerns.

Grace Souza
1333 Lawton Ave.
Pacific Grove, CA 93950



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

June 16, 2015

Joseph Sidor
Monterey County
168 West Alisal Street
Salinas, CA 93901

JUN 22 2015

Subject: Pebble Beach Company Inclusionary Housing Project
SCH#: 2014081052

Dear Joseph Sidor:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on June 15, 2015, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

**Document Details Report
State Clearinghouse Data Base**

SCH# 2014081052
Project Title Pebble Beach Company Inclusionary Housing Project
Lead Agency Monterey County

Type EIR Draft EIR

Description The Project is development of 24 affordable (inclusionary) housing units on 2.7 acres and preservation of Monterey pine forest as open space on 10.5 acres. The 24 housing units would be two-story units dispersed within 4 buildings. The Project also includes a manager's office, 67 parking spaces, two driveway access points from SFB Morse Drive, and landscaping. The 13.2-acre Project site is outside the Coastal Zone and has an entitlement for water supply based on the Applicant's financing of the Recycled Water Project. The current zoning designation of the Project site is Medium Density Residential (4 units per acre) on 7.7 acres and Resource Conservation on 5.5 acres. The proposed development would be entirely within the area zoned for residential development.

Lead Agency Contact

Name Joseph Sidor
Agency Monterey County
Phone 831 755 5262 **Fax**
email
Address 168 West Alisal Street
City Salinas **State** CA **Zip** 93901

Project Location

County Monterey
City Pacific Grove
Region
Lat / Long 36° 35' 59.7" N / 121° 56' 9.7" W
Cross Streets SFB Morse Drive and Ortega Road
Parcel No. 008-041-009-000
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 68
Airports
Railways
Waterways Monterey Bay (Pacific Ocean)
Schools Forest Grove
Land Use Medium Density Residential and Open Space

Project Issues Air Quality; Biological Resources; Drainage/Absorption; Geologic/Seismic; Noise; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual; Archaeologic-Historic

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 4; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 5; Air Resources Board; Regional Water Quality Control Board, Region 3; Native American Heritage Commission; Department of Housing and Community Development

Date Received 04/30/2015 **Start of Review** 04/30/2015 **End of Review** 06/15/2015

joyce stevens, architect,(ret.)
p.o. box. 2116
carmel-by-the-sea, ca. 93921



Joseph Sidor, Associates
Monterey County Planning Department
168 West Alisal St., 2nd floor
Salinas, CA 93901

June 14, 2015

SUBJECT: Comments on Pebble Beach Co. Inclusionary Housing DEIR

Dear Mr. Sidor:

As a long-time local conservation activist, I have participated in Pebble Beach Co.'s various final build-out plan documents over the years and, hereby, submit my comments for subject DEIR as follows:

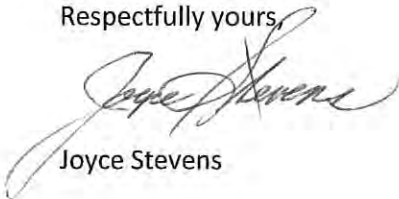
1. Aesthetics: Orienting the buildings to the southwest, as shown on site plan, provides the benefits of pleasant forest views, maximum sunshine and privacy from (and for) neighbors.

2. Biological Resources: With an existing residential area on the northern boundary, a road on the southern edge, and freely used by neighbors for many years, this is not a pristine site. However, there is some habitat value left. Mitigation, by replanting native trees and shrubs, should be initially protected with temporary enclosures. Also, identify all existing viable native trees and shrubs, outside the construction footprint, and protect them with sturdy enclosures during construction.

3. Alternatives: Table ES-3b: Biological Resources column shows that 6 out of 7 alternative sites have more negative environmental impacts than proposed project, indicating that proposed project site is preferable.

4. Water: Because of PBCo.'s financial and management participation in the Carmel Area Wastwater District's recycling project, all Pebble Beach properties are exempt from the current CalAm water moratorium. Therefore, only Pebble Beach sites are viable.

Respectfully yours,



Joyce Stevens

Sidor, Joe (Joseph) x5262

From: Dana Van Horn [dana.vanhorn@sbcglobal.net]
Sent: Friday, June 19, 2015 4:55 PM
To: Sidor, Joe (Joseph) x5262
Subject: Pebble Beach inclusionary housing project DEIR



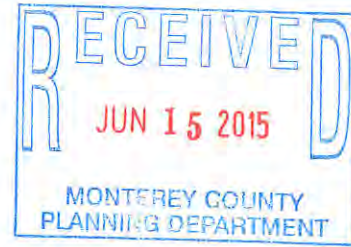
Mr. Sidor -

With regard to the above noted project DEIR...I would like to know the number of viable trees that will be taken down if the preferred alternative is chosen. As I am sure you are aware a number of Monterey pines are infested and will die in any case...I would be interested to know the take on healthy pines for the preferred alternative.

Also, with regard to alternative sites, the 17 Mile/Sunset site is already the nexus of frequent accidents...how will this project specifically impact this intersection? Additionally, although this site is close to schools, there are no sidewalks for school children to get to those schools, what is the impact of this on this alternative site?

Dana Van Horn

Dorothy Vriend
1128 Buena Vista Ave.,
Pacific Grove, CA 93950



June 11, 2015

Joseph Sidor, Associate Planner
Monterey County Resource Management Agency - Planning
168 W. Alisal St., 2nd Floor
Salinas, CA 93901

Dear Joseph Sidor,

I am writing to comment on the DEIR on the proposed Pebble Beach Co. Inclusionary Housing Project off Morse Drive in Pebble Beach abutting the Del Monte Park neighborhood in Pacific Grove. The DEIR has concluded that the Collins residential area of Pebble Beach is the environmentally superior alternative site for this project. I urge the planning department to recommend this site or another site analyzed in the report, the Sunset Drive/17-Mile Drive site, in order to preserve the existing forest on the proposed (Area D) site.

The tree cover is a large part of what makes both communities — Pebble Beach and Pacific Grove — so appealing to live in and attractive to tourists, creating a much needed income for local businesses, and contributing to the health of its citizens. On a global scale the loss of forested areas contributes to climate change, and compromises the health of our planet. For all these reasons I believe it is important to choose one of the alternative sites listed in the DEIR and to avoid cutting down 725 healthy oak and pine trees for this project.

While it may seem that the tree cover is abundant in the Pebble Beach and Del Monte Park neighborhoods, careful stewardship of our forests will ensure that we continue to live in a place that is healthy and abundant in natural beauty. When the national parks were created in the early 1900s, there was no shortage of tree-cover, but the foresight the founders had has enriched our lives today.

I believe choosing an alternative that saves these trees will have both immediate and long-term benefits for our community. On a personal note, I walk through the forest that would be scheduled for removal several times a week, and share my walk with deer, birds, and other wildlife.

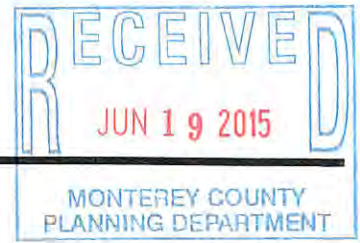
Since there is an environmentally superior alternative, please save this forest for the benefit of both communities.

Sincerely,

Dorothy Vriend

831-333-9554
dvriend@me.com

Gonzales, Eva x5186



From: J W [j.walk@me.com]
Sent: Friday, June 19, 2015 1:35 PM
To: ceqacommments
Subject: DEIR Comments Re: Pebble Beach Company Inclusionary Housing Project (RMA-Planning File No.PLN130447; (SCH#2014081052)

TO: MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY

Carl P. Holm, AICP, Acting Director; John Guertin, Acting Deputy Director; Daniel Dobrilovic, Acting Building Official; Robert K. Murdoch, P.E., Director of Public Works

168 W. Alisal Street, 2nd Floor
Salinas, CA 93901

www.co.monterey.ca.us/rma

SUBJECT: DEIR Comments Re: Pebble Beach Company Inclusionary Housing Project (RMA-Planning File No.PLN130447; (SCH#2014081052)

Gentlemen:

We are writing on behalf of ourselves and our elderly neighbors who don't have access to computers, to inform you of our thoughts and comments regarding the above listed project. We have read the EIR and attended the Pacific Grove City Council meetings regarding the project and, as a result, have come to the conclusion that we must in good conscience oppose the housing project at the currently proposed location—for numerous safety and environmental dangers, which the EIR authors seem to have dismissed with a conspicuously incomplete investigation.

Some of the issues cited in the EIR were also systematically dismissed within the same sections with hollow comments that "remediation" would be similar to some previous projects but no actual references or citations to those projects were listed. The solutions are not detailed as if they will be magically willed away if we just have faith. This is no solution.

Our thoughts about the project are very real and a mere belief in—or by—our officials, that the effects of the proposed destruction of our forests, and the habitat of innumerable animals, insects, and air quality will not result as a consequence, will not suffice to "remediate" them.

The area for the construction site will suffer the elimination of more than 700 trees. Simply planting extra trees somewhere else is of little value to us or to the wildlife that currently resides there. Deer and smaller animals are already being killed by autos at a noticeably higher rate than before the large parking lot was built adjacent to Spanish Bay Inn. There will be many, many more deaths if this project is completed.

Water is an ongoing major issue. Pretending that moving in many new residents will not add to the current problems is wishful thinking. Especially to those of us who can't obtain permission to add a bathroom or who have been forced to remove various water points in our homes despite the fact that an additional bathroom would not result in any increase in our water consumption, it would just save some painful additional steps for those of us with mobility issues when we need to use a toilet. New families, presumably with children, gardens, diapers and laundry needs, etc. will put further burdens on our water supplies.

Safety is not completely addressed by the EIR. The lack of sidewalks and lighting near the building site present further dangers for pedestrians, particularly children, near the housing project. Adding lights and sidewalks will further degrade the forested areas we all know and love. It is dark by 4:30 p.m. in the winter time, some children participating in extra-curricular activities after normal school hours will be at risk walking to their homes.

Traffic and pollution are also of concern for the obvious reasons. In short, we support the notion of inclusionary housing for those who benefit from it; but this site, in this proposed location, is a grievous misjudgment. The already deforested area near the intersection of 17 mile drive and Sunset is a superior location and provides better access to all facilities. We urge a serious consideration of it as the best alternative.

Please advise us by email or by phone, that you have received this letter within the time limit (today is the last day) specified for commenting on the EIR.

Sincerely yours,

Jan Walker
Mercedes Villezcas
Neighbors, et al

mailing address: PO Box 203
Pacific Grove, CA 93950

telephone: (831) 659-2165

RECEIVED
JUN 11 2015

June 8th, 15

Dear Sir,

RE: Pebble Beach Co. Del Monte Forest Preserve / Proposed Housing

It appears that the Pebble Beach Co. is behaving in a similar manner to the fracking companies in Pennsylvania. Fracking company representatives smooth talk the general public by poohing valid suggestions, making convincing promises and assurances but ultimately failing to follow through.

The people who reside in the Del Monte Forest area bought houses near a "preserve" designated by the Pebble Beach Co. itself. People who don't live in that community are free to visit the preserve, and perhaps forage for porcini. Personally, I love trees. I find them to be both majestic to the eye and sheltering to the soul.

What is wrong with the affluent people of today is that instead of showing generosity and genuine good will they are content with minimal compliance with the letter of the law. So they betray the environment while claiming adherence to the legal requirements.

They may succeed in making extra profit for themselves ^{but it is} by sacrificing the interests of the general public.

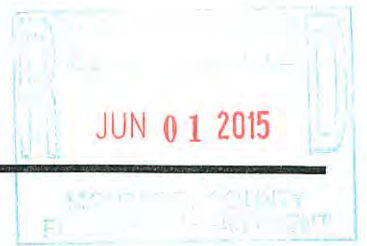
Our founding fathers and patriots at large would be ashamed of them. They make our renowned philanthropists like Carnegie and others look like saints! What happened to making things nicer for everyone and creating the greater good? Where are the men and women of substance who invest in aesthetics and other social values? Instead, these narcissists like monied lemmings seem so blind to goodness and their possible legacy.

As things stand now, alternative sites are already cleared. I would like to see the housing split between them and managed in an enlightened and considerate manner.

Thank you,
Ms. Stormy G. Weatherbee

P.S. Please consider also that Pebble Beach Co. will be setting a horrible example of disrespect toward the owners of property adjacent to the forest. The people moving in to the projected housing may not feel welcome. The people moving in may follow the example of their "housers" in showing disrespect to the adjacent community.

Gonzales, Eva x5186



From: Thaleia Widenmann [delmonte2013@sbcglobal.net]
Sent: Monday, June 01, 2015 11:38 AM
To: ceqacomments
Subject: CEQA Comment PLN130447, Pebble Beach Inclusionary Housing
Attachments: EIR Comment Character of Community.pdf

Attached is a copy of a comment letter pertaining to the draft EIR for the above referenced project.

Confirmation of receipt would be appreciated.

Thank you,
Thaleia Widenmann

June 1, 2015
2864 Coyote Rd.
Pebble Beach, CA 93953

Joseph Sidor, Associate Planner
Monterey County RMA – Planning
168 W. Alisal St., 2nd Floor
Salinas, CA 93901
Via email to CEQAcomments@co.monterey.ca.us

RE: PLN130447 Pebble Beach Inclusionary Housing Draft EIR

Dear Mr. Sidor:

Thank you for the opportunity to comment regarding the above referenced project.

Impacts addressed by this comment:

Impact LU-A1: The project could introduce a new land use that could be incompatible with surrounding land uses or the general character of the area. (Less than significant before mitigation)

Impact AES-B1: The Project could degrade the visual character and quality of the Project site. (Less than significant with mitigation)

The analysis (beginning on page 3.8-8) upon which Impact **LU-A1** is evaluated is flagrantly inadequate with respect to surrounding land use in the Del Monte Forest. While impacts on Pacific Grove are discussed at some length, land use compatibility in the DMF is dispensed with in a single sentence:

“The residential areas in Pebble Beach to the west of the Project site have lower densities, ranging from approximately 1 to 4 du/ac, but the units are separated more from the Project site by distance and the proposed forest preservation area to the west of SFB Morse Drive.”

The general character of the surrounding area in the DMF is defined by the consistent implementation of visionary, environmentally sensitive land-use policies for nearly a century. It should not be so frivolously disregarded.

Surrounding land use and general character of the area

This DMF neighborhood is semi-rural consisting entirely of single-family homes on large lots (one quarter acre or more) dispersed throughout a forest. Most homes are owner-occupied. Roads are narrow and winding without sidewalks or streetlights, and the night time sky is dark. By deed restriction all properties since the 1920's have been developed under strict design standards, a primary purpose of which is to ensure compatibility with neighboring properties and the community in general. Carports are prohibited and exterior lighting is discouraged as are structures which are in strong contrast or out of scale with neighboring residences. These standards are codified in the Architectural Standards and Residential Guidelines for the Del Monte Forest*

Incompatibility of the Project with surrounding land use and general character of the area

The Project, on the other hand, is completely incompatible with existing land use and the general character of the area. It will introduce high-density, attached multifamily dwellings exclusively for rental use into an area where all homes are single family and most are owner-occupied. With a footprint of approximately 65,000 square feet, it will occupy the space of eight quarter acre lots and is completely out of scale with the existing neighborhood. Due to mandatory minimum occupancy requirements, the project will likely generate a higher level of human activity and commotion relative to the tranquil environment of the surrounding area. It will also introduce light pollution to the dark night time sky, unacceptable levels of traffic, and prohibited carports.

Defects in draft EIR

The draft EIR inappropriately and incorrectly minimizes (or fails entirely to consider) the above factors and derives conclusions by simply remarking that the Project is "separated more" from the DMF neighborhood and that visual impacts in the DMF are limited mostly to quick glimpses by motorists driving by.

The DEIR also identifies the degradation of the visual character and quality of the Project site as a significant impact, then states that the impact can be reduced to an insignificant level with "native infill plantings." (**Impact AES-B1**)

These arguments fail to provide sufficient, competent evidence to support the conclusions rendered for the following reasons:

- 1) The Project is not evaluated for conformance with the long-standing land use and design standards and practices which have defined the general character of the area and to which all other development must adhere.
- 2) Exemptions to these standards and practices are not granted simply because motorists will drive by quickly, there will be "native infill" plantings, or the development will be "separated more."
- 3) The effectiveness of the "native infill" plantings as mitigation for visual impact (for **Impact AES-B1**) is questionable based upon the poor results of over twenty years of similar mitigation in the adjacent Sawmill Borrow. Requiring the PB Co. to submit an "annual monitoring" report to the County is insufficient enforcement to provide reasonable assurance of reducing the

impact to a less than significant level.

- 4) The feasibility of obtaining sufficient visual screening from the infill plantings is also questionable because of uncertainty over measures which may be imposed by Cal Fire to address potential drought-related emergency fire hazard conditions. The significance of this uncertainty is heightened by the location of the project in the high-risk interface zone bordering one of the largest uninterrupted tracts of forest in the DMF.

Accordingly I request the following revisions to the draft EIR:

- 1. Please include a comprehensive analysis of the impact the project would have on the compatibility with surrounding land uses and the general character of the surrounding area of the DMF.**
 - a) In the analysis please specifically address the concerns outlined in the above paragraph titled "Incompatibility of the Project with surrounding land use and general character of the area."**
 - b) I request that the analysis also include a "worst case" scenario in which the planned mitigation from the "native infill" plantings fails to be completed or maintained.**
 - c) I further request that the analysis consider the impact of the Project on residents of properties within specified distances from the Project site and the community in general rather than merely passing motorists.**
- 2. Please develop and include an alternative which complies with the Architectural Standards and Residential Guidelines for the Del Monte Forest* and preferably is approved by the Del Monte Forest Architectural Review Board.**
- 3. Please include an evaluation by Cal Fire of the feasibility of installing and maintaining the proposed "native infill plantings" in light of current drought-related high fire hazard conditions.**

Thank you once again for the opportunity to comment on the draft EIR.

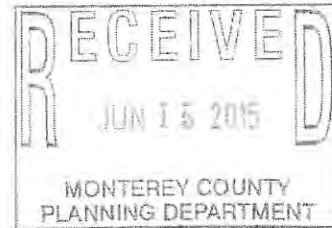
Very truly yours,

Thaleia Widenmann

* Architectural Standards and Residential Guidelines for the Del Monte Forest, Pebble Beach Company Real Estate Division.

June 15, 2015
2864 Coyote Rd.
Pebble Beach, CA 93953

Joseph Sidor, Associate Planner
Monterey County RMA – Planning
168 W. Alisal St., 2nd Floor
Salinas, CA 93901
Via email to CEQAcomments@co.monterey.ca.us



RE: PLN130447 Pebble Beach Inclusionary Housing Draft EIR

Dear Mr. Sidor:

Thank you for the opportunity to comment regarding the above referenced project.

As discussed in our email correspondence dated April 23, 2015 (copies attached), tree removal counts have not been updated to reflect the 3,500 square foot expansion of the project (proposed in December 2014) to incorporate additional parking.

Assuming average tree density of the additional development is roughly equivalent to that of the original footprint and extrapolating, one could guesstimate that roughly 40* additional trees might need to be removed.

Judging by the recent sanctions imposed by the County Supervisors for the unpermitted removal of roughly 40 trees in an unrelated project, one can infer that 40 trees is considered environmentally significant.

Since the native Monterey Pine and Coast Live Oak trees represent one of project site's most important biological resources, a precise and accurate count of the trees to be removed is necessary to a meaningful evaluation of the environmental impact of the project.

** Calculation: 716 trees/61,500 Sq. Ft.(original footprint) X 3,500 Sq. Ft.(expansion) = 41. Say 40 after rounding*

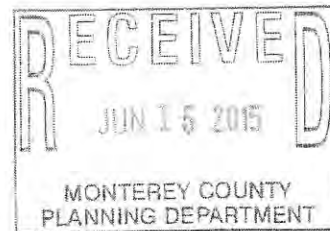
I therefore request that, at a minimum, the following sections draft EIR be revised to include and take into consideration an accurate and precise tree removal count updated to reflect the 3,500 Sf. Ft. expansion proposed in December 2014.

- Executive Summary
- Chapter 1 Introduction
- Chapter 2 Project Description
- Section 3.3 Biological Resources
- Chapter 4 Other Required CEQA Sections
- Chapter 5 Alternatives

Thank you once again for the opportunity to comment on the draft EIR.

Very truly yours,

Thaleia Widenmann
Attachments



Subject: Inaccuracy in project description? (PLN130447)
From: Thaleia Widenmann (delmonte2013@sbcglobal.net)
To: sidorj@co.monterey.ca.us;
Date: Thursday, April 23, 2015 9:08 AM

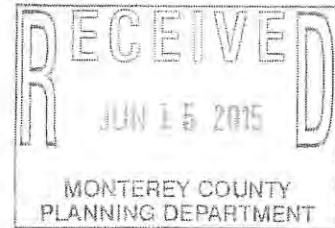
Hi Joe,

As you know, revised plans for the Pebble Beach inclusionary housing were submitted on December 9, 2014. This revision expands total overall lot coverage by about 3,500 square feet to a total of 65,000 square feet. However, the number of trees to be removed per the project description on the County website does not appear to have been updated.

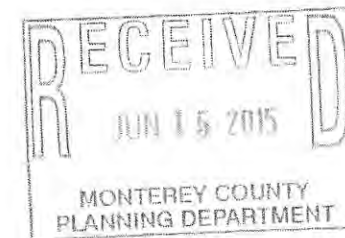
May I inquire what the new tree removal figures are? And will the project description be updated?

Thank you for your time and attention.

Best regards,
Thaleia



Subject: RE: Inaccuracy in project description? (PLN130447)
From: Sidor, Joe (Joseph) x5262 (SidorJ@co.monterey.ca.us)
To: delmonte2013@sbcglobal.net;
Date: Thursday, April 23, 2015 1:07 PM



Thaleia,

The project description identifies the amount of tree removal as approximate, so there is no inaccuracy. If required, the County may update the project description as we approach the public hearing for the project.

Joe

Joseph Sidor / Associate Planner

County of Monterey RMA - Planning / ALUC

168 W. Alisal St / Salinas, CA 93901

(831) 755-5262



In Nov 2013 I bought my home on Ortega Rd. Area D had been designated as the affordable housing location many months prior. When I chose my property I "EXCLUSIVLY" was targeting a quiet, peaceful, tranquil setting...cottage like feeling.

Upon signing all the purchase documents there was a list of all the proposed construction projects of PB Co. All except for the Area D project. If this project is such a great benefit as a homebuyer, don't you think the agents would have mentioned it?? Guess it's not like adding tennis courts or a indoor pool, is it??

The agent did this because the faintest mention of the word multi unit government assisted housing next door would have generated a response as; "show me a property much further away". My criteria was specific to cottage like feeling... not clustered multi-unit homes or townhouses as they are commonly called.

At the time of my house hunting my brother from Belmont told me PB should be a good sound location ...at least there will be no chance of apartments or townhouses in the area your looking, it's all single residential homes and forest.

He mentioned this because when he bought his first home in California in 2001, two years later affordable housing was put in close by. His home value dropped significantly (50%) and the neighborhood was plagued with crime.

I chose this location because of its defined character. This muti-unit project is not consistent with the neighborhood nor does it comply with the current zoning. If I were told about this project so close to my home there would never have been a chance of me buying it!!

This proposal is a nightmare for the residents in close proximity to Area D.... The listing agent had trouble selling the home when disclosing the muti-unit project at Area D. She then reduced the price twice. The listing agent, my agent and the homeowner all conspired and committed an act of fraud (as stated by my attorney). I also now believe that two other offers at the time of purchase were staged. I was the perfect victim as I was an all cash deal and there was no loan institution that would complicate their plot. If this project is fully approved in Area D, I will traffic levels of cars and people passing though the end of David St. (which is not a proper gate) will irritate me greatly.

Yes it is a good thing to help the less fortunate.... But to give them housing at the cost of depreciating home values by 25% on completion of the project is a cost too high. I'm sure that many homeowners in this area are experiencing high levels of stress and sleepless nights as I am. One's greatest asset toward retirement and old age is being compromised. I know all too well the adverse affects and depreciation of home values when paired with affordable housing. Consider only 60 homes in the proximity at an average cost of \$700,000. Deflation of 25% will be 10million dollars. If I'm wrong about this then we the residents should get in writing a guarantee that protects us should our home values suffer in relation to the Area D project.

The affordable housing project that is coming to our neighborhood... is pretty close to me... only 4 homes away. I took special interest in the example given of the individual and his family from the last Pacific Grove Council meeting on June 3rd 2015. A Mr Ammar Mo presented a potential low income resident.... Apparently he performed as an English translator for the US military and is eager to be our new neighbor.... strange that the potentially new neighbor couldn't say a few words in English as he stood before us.

I worked very hard throughout my life to build my financial assets. I was on my own at age 19 and never received any financial aid. I was born and raised in Toronto Canada and decided to try living somewhere else, my city changed.... it changed a lot, concrete towers filled the sky. The city of Toronto has the most construction of multi unit condominium towers in the world currently. It wasn't for me anymore, so I chose one of the most beautiful places in the world...to settle. Here in Monterey County where many people care about preserving the natural environment best they can.

I served along side US military personal in some pretty hot areas. We had no need to translate between us...we understood each other very well. I have two professional designations. So I believe I earned the right to enjoy such a prestigious area as PB providing I can afford to. But I have great difficulties getting any US status. Homeland Security sees me as a risk of taking away an Americans job. I kind of see their point. BTW I bought my home in cash and have injected 1.2 million dollars into ur economy in the year that I have spent here.

What I don't understand AND DEEPLY PERPLEXES ME is THE WILLINGNESS of some of the people here to display and support

potential affordable housing residents in such a positive light.
Beware...."They wont all be good apples!"

We all want to help people...I myself give back to Sick Children's Hospital, Rinehart Foundation and Amnesty International.... but lets take a closer look at the example presented before the Monterey counsel members so positively at our last meeting. A person with no mention of any practical level of education or professional designation. It was stated that he helped the US military as a translator...well that is a "slang term" for an informant which explains him placing his family at risk and ends up here in America on a free meal ticket. So this lucky immigrant gets to live in one of the most prestigious places in America, takes away a job from willing local citizens and gets financial aid for his whole family. Sounds like.... and smells like the deal Russia made with Edward Snowden. A real sweet deal. Correct me if I'm wrong, doesn't America have Americans that have been living here many years that are in need of the same services. This person Mo Ammar has close ties with Pebble Beach's Mark Stilwell and appears to be Pebble Beach's propaganda spokesperson.

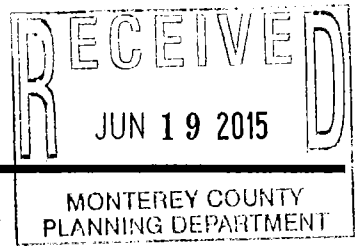
There is a real possibility of who truly may become a new member of our neighborhood with this affordable housing project. So not too long ago I spoke with an employee of PB Co. This person commutes from Salinas. This person is on financial aid currently. This person is anxious to apply for the Area D housing project. BTW this person also has a child that is a current gang member with one of the two gangs in Salinas.

Nowhere is it written that "only PB Co. employees" will reside in Area D "or" on termination of employment from the PB Co. a resident will have to vacate Area D ??

Can we get this condition in writing...????should this project move forward?

Sincerely, Steve Wilson 831.224.6837

1082 Ortega Rd
Pebble Beach
93953



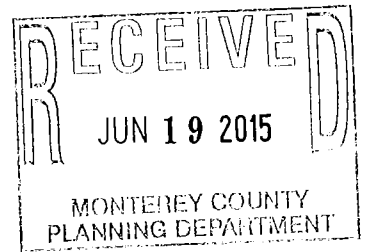
Gonzales, Eva x5186

From: William Parkin [wparkin@wittweparkin.com]
Sent: Friday, June 19, 2015 5:00 PM
To: Sidor, Joe (Joseph) x5262; ceqacomments
Subject: Pebble Beach Inclusionary Housing--Comment on DEIR
Attachments: MX-M565N_20150619_184914.pdf

Dear Mr. Sidor:

Please see attached. These comments are submitted on behalf of Del Monte Neighbors United

William Parkin
Wittwer Parkin LLP
147 S. River Street, Suite 221
Santa Cruz, CA
(831)429-4055



June 19, 2014

VIA EMAIL AND U.S. MAIL

Mr. Joseph Sidor, Associate Planner
Monterey County Resource Management Agency-Planning
168 W. Alisal St., 2nd Floor
Salinas, CA 93901
SidorJ@co.monterey.ca.us
CEQAcomments@co.monterey.ca.us

Re: Pebble Beach Company Inclusionary Housing Project
Comments on Draft Environmental Impact Report

Dear Mr. Sidor:

This law firm represents Del Monte Neighbors United (DMNU) regarding the above referenced matter. DMNU has multiple concerns regarding this project. Please note that DMNU supports inclusionary housing and the comments herein are directed at the development project itself. Indeed, there are alternative projects that would still provide much needed affordable housing without the commensurate environmental impacts. DMNU would oppose this project regardless of whether the project was a market rate project or an inclusionary housing project. The layout and impacts of the project are what is objectionable, not the type of housing.

As a preliminary matter, we have included herewith separate comments from Land Protection Partners that concern the biological impacts of the project. We specifically request that the County consider this document a separate submission requiring a direct written response to comments pursuant to CEQA Guidelines § 15088(a). We want to ensure that the County understands that this is not simply a reference attached to these comments, but separate comments on the biological impacts of the project requiring a written response.

Below we also provide specific itemized comments, each requiring a response pursuant to CEQA Guidelines § 15088(a).

1) It is clear that the County has segmented this project from the larger Pebble Beach market rate housing project. Indeed, the project is a direct requirement of the market rate housing project and the Draft Environmental Impact Report (DEIR) examines the inclusionary component in a vacuum without consideration of the other effects of the larger project. This is a fatal flaw in the DEIR that must be addressed in a recirculated DEIR. For example, the removal

Mr. Joseph Sidor
Comments on DEIR
June 19, 2015
Page 2

of Monterey pine habitat is examined on this site separately from the actual market rate development. This is just one example of the DEIR's failure to properly examine the impacts of the project.

The CEQA Guidelines state that "'Project' means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment [including] [a]n activity directly undertaken by any public agency" such as the "enactment and amendment of zoning ordinances..." 14 Cal. Code Regs. § 15378(a). Precedent has long established that the environmental impacts of a project cannot be submerged by chopping a larger project into smaller pieces. *See Burbank-Glendale-Pasadena Airport Authority v. Hensler* (1991)233 Cal.App.3d 577, 592. "A project may not be divided into smaller projects to qualify for one or more exemptions" to avoid the responsibility of considering the environmental impact of the project as a whole. 14 Cal. Code Regs §21159.27.

A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole. "The requirements of CEQA, 'cannot be avoided by chopping up proposed projects into bite-size pieces which, individually considered, might be found to have no significant effect on the environment or to be only ministerial.' [Citation.]" [Citation] "[The] term 'project,' . . . means the *whole of an action* which has a potential for physical impact on the environment, and . . . '[the] term "*project*" refers to the *underlying activity and not the governmental approval process.*' [Citation.]" [Citation.] "It is, of course, too late to argue for a grudging, miserly reading of CEQA . . . [The] Legislature intended CEQA 'to be interpreted in such manner as to afford the *fullest possible protection* to the environment within the reasonable scope of the statutory language.' (Italics added.) . . . [para.] One . . . overwhelming consideration which militates against deferring the preparation and consideration of an EIR . . . is the mandate of CEQA that environmental considerations do not become submerged by chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences." (*Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263, 274, 283-284...)

Orinda Ass'n v Board of Supervisors (1986) 182 CA 3d 1145, 1171. CEQA mandates "that environmental considerations do not become submerged by chopping a large project into many little ones — each with a . . . potential impact on the environment — which cumulatively may have disastrous consequences." *Bozung v. Local Agency Formation Comm., supra*, 13 Cal.3d at 283-284.

Mr. Joseph Sidor
Comments on DEIR
June 19, 2015
Page 3

When evaluating environmental impacts under CEQA, it is key to properly define the scope of the project. A project is required to be defined broadly. “A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole.” *Orinda Ass'n v. Board of Supervisors*, *supra*, 182 CA 3d at 1171; *City of Santee v. County of San Diego (Santee)* (1989) 214 Cal.App.3d 1438, 1452. “An accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.” *Burbank-Glendale-Pasadena Airport Authority v. Hensler*, *supra*, 233 Cal.App.3d at 592, *citing McQueen v. Bd. of Directors* (1988) 202 Cal. App. 3d 1136, 1143. “A narrow view of a project could result in the fallacy of division, that is, overlooking its cumulative impact by separately focusing on isolated parts of the whole.” *Id.*

The County's conduct here is similar to that in *Santee*, where the court held that the county violated CEQA by segmenting a project. The EIR in that case was inadequate because temporary facilities were only one small part of a county plan to ease jail crowding in the entire county. *Santee*, *supra*, 214 Cal.App.3d at 1455. It was clear that a larger project was contemplated and the County was chopping it up into small projects rather than dealing with it as a complete program. *Id.* at 1454. As in *Santee*, the County in the case at bar is segmenting a larger and expressly contemplated housing development. Moreover, the County is failing to adequately assess the environmental impacts that the projects will have individually and as a whole.

Keeping in mind that only through an accurate view of the project may the public and interested parties and public agencies balance the proposed project's benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives, we conclude that the project here did not contain “an accurate, stable and finite project description” which is the “*sine qua non* of an informative and legally sufficient EIR.”

Santee, *supra*, 214 Cal. App. 3d at 1454, *quoting County of Inyo v. City of Los Angeles* (1985) 71 Cal.App.3d 185, 192–193. CEQA requires the County to consider subsequent elements of a project that are already in the planning process. *McQueen v. Board of Directors of the Mid-peninsula Regional Open Space District*, *supra*, 202 Cal. App. 3d at 1143, 1146 (disapproved on other grounds).

There exists a real danger in the filing of separate environmental documents for the same project because consideration of the full impact on the environment may never occur. *Santee*, *supra*, 214 Cal. App. 3d at 1452, *citing Citizens Assoc. For Sensible Development of Bishop*

Area v. County of Inyo (1985) 172 Cal.App.3d 151, 166. Here, the County is “separately focusing on isolated parts of the whole” and evading adequate and comprehensive environmental review. *Burbank-Glendale-Pasadena Airport Authority v. Hensler*, *supra* 233 Cal.App.3d at 592.

Segmentation is present when a project is part of a much larger project. *Arviv Enterprises, Inc v. South Valley Area Planning Commission* (2002) 101 Cal.App.4th 1333 (where a developer sought approval of a project through a series of numerous applications for categorical exemptions, mitigated Negative Declarations and variances, an EIR was required for the entire project.) An EIR must analyze two actions together when they are steps to achieve the same objective. *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214 (an agency engaged in unlawful segmentation of its environmental review of a proposed home improvement center because the Negative Declaration did not identify and analyze the impacts of constructing improvements to adjacent roadways which were a required condition of approving the center); *Nelson v. County of Kern* (2010) 190 Cal. App. 4th 252 (mining company’s proposed mining operations and reclamation plan together constituted a single project because both aspects were integrally related and constituted the whole of the action or the entire activity for which approvals were being sought).

The County’s review here clearly violates this standard. Separating the inclusionary housing project from the market rate housing project masks the true environmental impacts of the entire project. This DEIR must address the impacts of both housing developments as one project.

2) Why did the County separate the market rate component of the project from the inclusionary housing project?

3) Did the EIR for the market rate project alert the public that Area D would be considered for the inclusionary housing project? If not, why not?

4) DEIR pp. ES-2, 2-2 and 5-1, list project objectives. These project objectives are drawn too narrowly. There are a number of ways to meet the inclusionary housing requirement. For instance, the project does not necessarily have to be operated by PBC; it only has to be owned *or* controlled by PBC. Each of the objectives are so narrowly tailored that viable alternatives become “infeasible” in the DEIR’s analysis.

5) Does the County’s inclusionary housing ordinance, or the condition of the market rate development, require that the housing be built in close proximity to PBC facilities or other Del

Mr. Joseph Sidor
Comments on DEIR
June 19, 2015
Page 5

Monte Forest employment areas?

6) What PBC facilities or Del Monte employment areas does the applicant envision this development serving?

7) Will PBC be required as a condition of this development to reserve these homes for employees of PBC or for other facilities in the Del Monte Forest? (PBC has promised this to be the case.)

8) Is PBC the only entity or property with entitled water on the Monterey Peninsula?

9) DEIR p. ES-4, states that “native infill plantings around the development site” will be incorporated as mitigation. How will these native plantings be propagated? Will they be from local seed or sources that are related to the site? Will the project use hybridized plantings? Please specify the source and appropriateness of the plantings in relation to the site.

10) DEIR p. ES-4 (and elsewhere in the DEIR) states that the balance of the project site that is not developed will be placed in the conservation easement and serve as mitigation for the project. How does area in the project site that is undeveloped serve as mitigation? Conserving the balance of the property does not result in compensation for the loss of habitat or species. It is simply land that remains undeveloped.

11) If the balance of the site that is being placed in a conservation easement were not placed in an easement, could the balance of the site actually be developed based on site density and other resource factors? If so, how much?

12) DEIR pp. ES-7 and 5-6, dismisses Area V and Area U from consideration as alternatives. This is based on the flimsy argument that the DEIR is “evaluating the nearby Collins Residential Area.” This is not a reason to dismiss consideration of an alternative. Please include analysis of these alternatives in the DEIR as they are viable and must be legally considered. “Even as to alternatives that are rejected, however, the ‘EIR must explain why each suggested alternative either does not satisfy the goals of the proposed project, does not offer substantial environmental advantages[,] or cannot be accomplished.’ ” ([Citation]; see Cal. Code Regs., tit. 14, § 15091, subd. (c) [when agency finds alternatives are infeasible it must “describe the specific reasons for rejecting” them].)” *Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal. App. 4th 866, 883; *Preservation Action Council v. City of San Jose* (2006) 141 Cal. App. 4th 1336, 1354.

Mr. Joseph Sidor
Comments on DEIR
June 19, 2015
Page 6

13) The Collins Residential Area alternative would require an LCP amendment. Would Areas V and U also require LCP amendments to construct inclusionary housing on those sites?

14) Could inclusionary housing be dispersed and spread among the Collins Residential Area, Area V and U without an LCP amendment and meet all density requirements without such an amendment?

15) DEIR pp. ES-8 and 5-7, states that the Parking Lot at Spanish Bay alternative is “[n]ot financially feasible and dismissed because constructing a new underground structure would cost substantially more than paying the in-lieu fee.” However, this is not an adequate basis on which to find the alternative infeasible.

‘The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.’ ” (*Uphold Our Heritage v. Town of Woodside, supra*, 147 Cal.App.4th at p. 599; see *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1181 ...) Thus, when the cost of an alternative exceeds the cost of the proposed project, “it is the magnitude of the difference that will determine the feasibility of this alternative.” (*Uphold Our Heritage v. Town of Woodside, supra*, at p. 599.)

Center for Biological Diversity v. County of San Bernardino (2010) 185 Cal. App. 4th 866, 883. See also, *Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089. The Supreme Court stated that CEQA requires agencies to adopt feasible alternatives when there are unavoidable impacts of a proposed project.

CEQA does not authorize an agency to proceed with a project that will have significant, unmitigated effects on the environment, based simply on a weighing of those effects against the project's benefits, **unless the measures necessary to mitigate those effects are truly infeasible**. Such a rule, even were it not wholly inconsistent with the relevant statute (*id.*, § 21081, subd. (b)), would tend to displace the fundamental obligation of “[e]ach public agency [to] mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so” (*id.*, § 21002.1, subd. (b)).

City of Marina v. Board of Trustees of California State University (2006) 39 Cal. 4th 341, 368-369 (emphasis added); see also *County of San Diego v. Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal.App.4th 86, 98, 108, fn.18. Employing mitigations and alternatives

Mr. Joseph Sidor
Comments on DEIR
June 19, 2015
Page 7

are substantive mandates, not mere perfunctory informational requirements which the City can ignore by simply finding that the benefits outweigh the harm. This case was followed by another appellate decision that echoed the holding of the Supreme Court:

Further, the Legislature has also declared it to be the policy of the state “that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects” (§ 21002.) “Our Supreme Court has described the alternatives and mitigation sections as ‘the core’ of an EIR.” (*Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1029.) In furtherance of this policy, section 21081, subdivision (a), “contains a ‘substantive mandate’ requiring public agencies to refrain from approving projects with significant environmental effects if ‘there are feasible alternatives or mitigation measures’ that can substantially lessen or avoid those effects.” (*County of San Diego v. Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal.App.4th 86, 98, italics omitted; *Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 134.)

Uphold Our Heritage v. Town of Woodside (2007) 147 Cal.App. 4th 587, 597-598 (review denied); *Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal. App. 4th 866, 883. *Uphold Our Heritage* held that “[t]he willingness of the applicant to accept a feasible alternative, however, is no more relevant than the financial ability of the applicant to complete the alternative. To define feasible as appellants suggest would render CEQA meaningless.” *Id.* at 602. That is exactly what the Respondents have done here. They have created an artificial construct and in the end rejected alternatives simply because they did not like them, not because they were **truly infeasible**. *City of Marina v. Board of Trustees of California State University*, *supra*, 39 Cal. 4th at 368-369. The Court of Appeal in *WPA* I echoed this sentiment:

The purpose of an EIR is not to identify alleged alternatives that meet few if any of the project’s objectives so that these alleged alternatives may be readily eliminated. Since the purpose of an alternatives analysis is to allow the decision maker to determine whether there is an environmentally superior alternative that will meet most of the project’s objectives, the key to the selection of the range of alternatives is to identify alternatives that meet most of the project’s objectives but have a reduced level of environmental impacts.

Watsonville Pilots Assn. v. City of Watsonville, *supra*, 183 Cal.App.4th at 1089.

The Parking Lot at Spanish Bay would cause less environmental impacts because it

would not affect biological resources and would provide workers closer to PBC and Del Monte Forest facilities.

16) DEIR p. ES-8, also states that the Parking Lot at Spanish Bay alternative was analyzed in the Pebble Beach Company Project EIR. This is not entirely correct. Only underground parking was analyzed. That EIR did not analyze housing as a component of the parking lot.

17) DEIR p. ES-8, states that the Housing Dispersed in Multiple Areas is “[n]ot financially feasible and dismissed because no specific sites were suggested, specific locations would need to be identified and would need to be in the Del Monte Forest to qualify for PBC water... .” This is a ruse. First and foremost, members of the public are not required to show there are reasonable alternatives. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus*, (1994) 27 Cal. App. 4th 713, 737. “It is the project proponent’s responsibility to provide an adequate discussion of alternatives.” *Id.* “The duty of identifying and evaluating potentially feasible project alternatives lies with the proponent and the lead agency, not the public.” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 569. The fact that the public propounded a viable conceptual alternative does not mean it has to identify sites. Nevertheless, it is clear that there are multiple PBC sites that may be considered with dispersal of housing including the Corporation Yard, Sunset Drive/17-Mile Drive, the Collins residential Area, Area V, Area U, and the Parking Lot at Spanish Bay. Providing housing at varying sites throughout Pebble Beach may enhance the community and provide workers even greater access to where they might work at PBC and Del Monte Forest facilities. In conjunction with other development at these sites, the development could also be cost effective.

18) Does Pebble Beach have an objection to housing amongst its market rate housing or among its own facilities (such as the Corporation Yard)? If so, why?

19) DEIR p. ES-9, states that up to 31 market rate houses can be built on the project site. However, would PBC propose single-family dwellings as opposed to higher density residential development on the site? If so, how much of the site is truly developable? The DEIR also indicates that some of the land has steep slopes leading to the conclusion that it is not all developable as single-family residences. (There is also an inconsistency in the DEIR since on p. 1-5 the DEIR states that 30 units could be built under existing zoning with the balance being conserved as open space.)

20) Could market rate housing be clustered into higher density housing on the site in the

same manner as the proposed project under existing zoning?

21) Would PBC consider building single-family residences on the site as inclusionary housing?

22) The alternatives analysis is illegally skewed when the DEIR argues with respect to other alternatives that there will still be impacts associated with development of the project site if the inclusionary housing is constructed elsewhere. For instance, DEIR p. ES-10 and throughout the alternatives section assumes that even though there are less biological impacts associated with development of alternative sites, there would be indirect impacts associated with development of the project site with market rate housing. The alternatives analysis is designed to avoid the impacts of the project. It could also be easily concluded that development of any other site would also occur even if the project site is developed with inclusionary housing. The alternatives analysis is designed to evaluate avoidance of impacts, not assume development on every site.

23) If 31 market rate units could be built on the project site, why is PBC only going to develop 24 inclusionary units on the site instead of building 31 inclusionary units, or a combination of inclusionary and market rate units (e.g., 24 inclusionary units and 7 market rate units). (Note also that if PBC builds 100 market rate homes, it will be required to pay in-lieu fees for one additional unit since 25 units are needed. Why would PBC not build all 25 units if the zoning allows for even more units?

24) DEIR pp. ES-12 and 5-51 state that the Sunset Drive/17-Mile Drive alternative is not environmentally superior to the Collins Residential Area. This is based on the removal of residual contamination. How does removing contamination result in more environmental impacts? Will the contamination have to be removed in any event pursuant to any regulatory order?

25) DEIR p. 5-51 states that there is a leaking underground storage tank at the Sunset Drive/17-Mile Drive alternative site. Cleanup of this site would actually be an environmental benefit since it is leaking. To argue that the Collins Residential Area is superior to this alternative based on the need to cleanup a leaking underground storage tank is nonsensical and erroneous.

26) DEIR p. 5-51 also says that demolition of buildings at Sunset Drive/17 Mile Drive *could* contain asbestos and lead. The DEIR makes no definitive statement in this regard, and remediation of such hazards if existent would result in a positive environmental impact. This

again should not be a negative characteristic of this alternative disqualifying it as a superior alternative.

27) The Sunset Drive/17-Mile Drive alternative has advantages over the other alternatives in terms of transit. Why was this not a reason to elevate this alternative to being a superior alternative?

28) Are there plans to redevelop the Sunset Drive/17-Mile Drive at some point in the future regardless of whether it is constructed with inclusionary housing?

29) The DEIR is fatally flawed because it has two separate environmentally superior alternatives. The DEIR must choose an environmentally superior alternative among all alternatives. CEQA Guideline § 15126.6(e)(2). The DEIR's assertion that the alternative with development of market rate housing at the project site in conjunction with inclusionary housing and fees is environmentally superior is a ruse. This alternative assumes development of the site regardless of which other alternative is chosen. This is an improper CEQA alternatives analysis. The alternatives must assume the status quo at the project site. Please explain what legal basis there is to conclude that the alternatives analysis for alternative sites can still assume development of the site.

30) DEIR p. 2-6 assumes that the open space would be preserved on 10.5 acres of the 13.2 acre site. This is illusory. The placement of the project in the center of the site does not provide viable contiguous open space and habitat.

31) The DEIR's asserts that the inclusionary housing project will result in the Old Capitol Site being dedicated as open space resulting in preservation of more Monterey pine forest (85 acres total). (*See e.g.*, page 2-7). This exemplifies the nature of segmentation of the project. The inclusionary housing project is part of the larger PBC project, yet the preservation of forests was artificially separated from the rest of the project in violation of CEQA. Moreover, there will not be a net gain on Monterey pine forests. More forests are being removed by the project. It is actually a net loss and designating other areas that already exist for preservation is not a mitigation. And, PBS has already agreed to dedicate a portion of the Old Capitol Site pursuant to an agreement with the U.S. Fish and Wildlife Service. (DEIR p. 3.3-21, fn. 2).

32) DEIR p. 3.1-4, states that the forest on the project site is degraded. The arborists report indicates the presence of pitch canker. Given that Monterey pine forests have all suffered to some extent, what makes this site more degraded than other sites in the area?

33) Oaks throughout the region are also suffering from disease. What makes this particular forest more degraded than others in the area?

34) Trees are proposed to be removed and processed elsewhere within Pebble Beach. Given this, what precautions will be taken to ensure that the spread of pathogens does not occur? What conditions on the development will require PBC to take such precautions?

35) Simple removal of viable habitat for troubled species only exacerbates their plight. The arborist report and the DEIR use the forests health as an excuse to develop this particular site. This is not supported scientifically and increases the harm to the species.

36) Measure A designates the project site for possible mitigation (DEIR p. 3.8-5). Clearly this site has value as habitat otherwise Measure A would not have considered it a possible site.

37) If the forest is in a state of failing health as asserted, the visual analysis is skewed because trees in the forest will continue to decline leaving wide gaps in the visual impacts from adjacent neighborhoods. This was not considered in the flimsy visual analysis.

38) The simulations from the adjacent neighborhood (including David, Lincoln, Miles, Lawton and Shafter Avenues) are inaccurate since they do not portray the mass and bulk of structures that will be constructed and visible. The inadequacy of the analysis is exemplified by the attempt to use a white car and a person in orange to represent visibility. A small vehicle or a person dressed in orange can hardly be representative of a building. (Figures 3.1-6, 3.1-7). Moreover, simulations of buildings were used from SFB Morse Drive. (Figure 3.1-10). There is no reason that building simulations could not be used to perform visual analysis from adjacent neighborhoods. Figure 3.1-8 is equally absurd since it attempts to show where structures may be visible through trees. This simulation is wholly inadequate. Please provide photo simulations with buildings to replace Figures 3.1-6 and 3.1-7.

39) DEIR p. 3.1-5, states that since the forest is in declining health, it is visually degraded and the overall visual quality is considered "moderate." Of course given the DEIR's assertions regarding visibility from adjacent neighborhoods and trees screening development (which as pointed out is fallacious given that the simulations were inadequate), we have no doubt that if the forest was considered healthy with a high visual quality, the DEIR would conclude that the development is screened from view along SFB Morse Drive. The fact remains that the homes will be visible in what is now an undeveloped feature that the public considers important.

40) It is common for simulations to account for tree removal. The simulations from the adjacent neighborhood do not show how the views will be affected with trees removed. Please provide simulations with the 725 trees removed as part of the project site development.

41) Why did the DEIR not consider a color palette for the buildings that would reduce visibility from the adjacent neighborhood? The DEIR admits there are "lightly colored portions of the buildings." (DEIR p. 3.1-9).

42) DEIR p. 3.1-13, lists plant species to be used for screening. Are these plants endemic to the site? Will they be from locally propagated stock?

43) DEIR p. 3.3-10, how does this project comply with Policy GMP-3.5? It does not discourage removal native oak and Monterey pine since half the trees onsite will be removed. The DEIR's conclusion that the project complies with this policy is erroneous.

44) The DEIR does not appear to adequately account for defensible space requirements under Public Resources Code § 4291. What is the impact of implementing a defensible space around the proposed project?

45) DEIR p. 3.3-26, Mitigation Measure BIO-B1 leaves so much to the imagination. It simply propounds in a very cursory and general form possible solutions without any requisite detail for the public to make an informed decision as to whether the mitigation will actually work. Please provide a detailed explanation of the mitigation and what it will accomplish. Even the amount of restoration required is uncertain. Clearly the EIR preparers have not completed their analysis of the impacts and necessary compensation.

46) DEIR p. 3.3-31, is the most egregious example of the use of the undeveloped land to serve as mitigation for the loss of Monterey pine (BIO-C3). The DEIR simply concludes there is no impact to Monterey pine due to the dedication of the conservation easement and compliance with the County tree ordinance. However, the fact remains that this species will be removed on the site. Preserving other areas from development does not result in mitigation for loss of the species elsewhere. The same could be said for the description of the dedication mitigation at the top of page 3.3-32.

47) DEIR pp. 3.3-31 and 4-15 (cumulative impacts), stretch credulity when arguing that impacts to wildlife movement are insignificant because the site is degraded. Even a degraded site (which for purposes of this comment only we will assume to be true) that is intact open space, will provide more opportunity for wildlife movement than a site with a housing development

placed directly in the middle of an open space area. The DEIR does not even attempt to propound a mitigation for this impact. But, the impact is not less than significant. The development will severely restrict wildlife movement.

48) DEIR p. 3.3-31, wildlife breeding and nesting, the DEIR assumes that if species are avoided during construction, that is the end of the analysis. However, the DEIR fails to account for the permanent loss of habitat. Please provide an analysis of the effect of the permanent loss of habitat.

49) DEIR p. 3.3-34, states that trees will be planted onsite. However, given that the acreage for development will no longer be available, what is the practical reality that many trees for replanting can be accommodated onsite without impacting other trees or creating an unnaturally dense environment? Appendix I states that to comply with the Greater Monterey Peninsula Area Plan, “[r]eplacement tree(s) shall be located in the same general local as the tree being removed.” How will this be accomplished from a practical perspective?

50) Where will the trees come from for the replanting? Will genetically local and appropriate strains of Monterey pine and oaks be used on the site?

50) What size of trees will be used for the replanting? The DEIR is unclear.

51) DEIR p. 3.7-13, fails to provide details regarding oil/separators and biofiltration. Not all methods are created equal. The DEIR is wholly inadequate in providing information as to the technology that will be used and how effective it will be. There is also no recommended cleaning of facilities or the parking lot to reduce pollutants. The DEIR needs to include more specifics and measures.

52) The analysis of land use impacts is inadequate. Most of the analysis is in Appendix I, which simply provides a table which lists land use consistency. The most troubling consistency determination is that the project complies with Greater Monterey Peninsula Area Plan Policy GMP-3.5, which discourages removal of Monterey pine and native oak. Half of the native oak and Monterey pine will be removed as part of this development. Thus, the project does not comply with this policy.

53) The DEIR downplays the fact that the project site is adjacent to a preservation area. (See Figure 3.8-4). Clearly the project site is a candidate for inclusion in that preservation area, further proving that alternatives to this site should be taken seriously. The effect in this preservation area is not analyzed in the DEIR.

54) DEIR p. 3.9-11, states that users of recreational trails “are not considered noise-sensitive receptors for this analysis because they are mobile through open space or along trails and would thus be exposed to noise levels only from Project sources or roadways for a short duration of time... .” This assertion is completely wrong. Recreationalists expect a higher level of quiet and noise can affect the recreational experience. As the Initial Study makes clear, this includes “substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.” CEQA Guidelines, Appendix G.

55) The noise chapter fails to adequately analyze the impacts associated with the concentrated parking lot facing the direction of single-family homes in the adjacent neighborhood. The noise chapter also ignores the required analysis from this perspective. Not only compliance with County requirements is necessary, but also Appendix G requires period increases to be considered.

56) DEIR p. 3.11-12, the trip generation numbers are artificially low given the location of the development. Only 13 vehicles are expected during the a.m. peak hours (and only 11 out), and 15 (and only 8 in) during the p.m. peak hours. This is far less than 24 (the number of units) and presumably two wage earners may live in any given household. Do these estimates assume a staggered work schedule for PBC employees? If so, on what basis?

57) If the project is for employee housing, are these numbers assuming PBC’s use of its shuttles?

58) Will PBC shuttles be available on demand for all employees? What conditions will be imposed to ensure that PBC will continue to use shuttles since the DEIR relies on the existence of shuttles as part of the impacts analysis (DEIR p. 3.11-33).

59) The DEIR dismisses the cumulative impact to Monterey pine forests. Monterey pine have suffered greatly from fragmentation due to development and pitch canker. It is a rare species. This development will continue the fragmentation of the pine forests. The dire status of this species means that even greater care and attention is needed to analyze the direct and cumulative impacts of this project. Indeed, in an analogous case,

the significance of an activity depends upon the setting. (Guidelines § 15064, subd. (b)). The relevant question to be addressed in the EIR is not the relative amount of precursors emitted by the project when compared with preexisting emissions, but whether any additional amount of precursor emissions should be considered significant in light of the serious nature of the ozone problems in this air basin.

Mr. Joseph Sidor
Comments on DEIR
June 19, 2015
Page 15

Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692, 718. Here, the DEIR makes the absurd argument that “[t]he Project would result in removal or conversion of less than 0.05 of the remaining Monterey pine forest with undeveloped understory in the Monterey region as well as all known remaining undeveloped Monterey pine forest in California and Mexico.” This violates CEQA because it minimizes the cumulative impact of development. The whole point of the cumulative impact analysis is to look at those impacts in conjunction with other developments to determine whether the impacts are cumulatively significant. “Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.” CEQA Guidelines § 15355. The County cannot escape this analysis by simply saying the development is insignificant. Indeed, the DEIR makes a Freudian slip when it admits at page 4-23 that “Development of the Project would result in irreversible changes to biological resources, specifically the loss of Monterey pine forest. Development of the Project would constitute a long-term intensification of developed uses, and it is unlikely that the land use would return to its original condition.”

The DEIR must be revised to conclude that there is a significant cumulative impact to Monterey pine forests and examine the nature of the action in relation to other developments that impact the Monterey pine forest.

54) In the cumulative impact analysis, the DEIR p. 4-10 and 4-13 again relies on the dedication of the undeveloped area as a mitigation. This is not a mitigation as stated earlier. With respect to cumulative impacts analysis it is even more absurd since the loss of the Monterey pine contributes to the cumulative loss Monterey pine.

For the foregoing reasons, the DEIR must be substantially revised and recirculated for public review and comment. The DEIR is inadequate and the changes necessary to make it adequate are substantial.

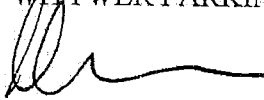
Pursuant to Public Resources Code § 21167(f), I am requesting that the County forward a Notice of Determination to us if and when the Project is finally approved. That section provides:

If a person has made a written request to the public agency for a copy of the notice specified in Section 21108 or 21152 prior to the date on which the agency approves or determines to carry out the project, then not later than five days from the date of the agency's action, the public agency shall deposit a written copy of the notice addressed to that person in the United States mail, first class postage prepaid.

Mr. Joseph Sidor
Comments on DEIR
June 19, 2015
Page 16

Thank you for your consideration of these comments. I look forward to the County's written response to these comments.

Very truly yours,
WITWER PARKIN LLP



William P. Parkin

Encl.

cc: Client



Land Protection Partners

P.O. Box 24020, Los Angeles, CA 90024-0020

Telephone: (310) 247-9719

Review of Biological Resources Analysis in Draft Environmental Impact Report for Pebble Beach Company Inclusionary Housing Project

June 18, 2015

Travis Longcore, Ph.D.
Catherine Rich, J.D., M.A.

1 Introduction

The Pebble Beach Company proposes to construct 24 housing units on 2.7 acres within a 13.2-acre parcel predominantly covered with Monterey Pine Forest in Pebble Beach, California. Monterey County has released a Draft Environmental Impact Report (DEIR) for the project (Pebble Beach Company Inclusionary Housing Project). Because of our expertise in natural resources, and in particular in environmental assessment, the law firm Wittwer Parkin, LLP has asked us to review the DEIR with regard to the impacts on biological resources.

This review is based on the documents available as part of the DEIR for the proposed project and the published scientific literature as cited in this report.

We conclude that there are several areas in which the DEIR is deficient either in its approach or in its coverage of the required topic areas under CEQA. As we elaborate below, these deficiencies include a wholesale deferral of mitigation to documents to be formulated later, failure to follow State-established protocols for surveys for sensitive species and vegetation types, lack of analytical detail to support conclusions about level of impact, failure to use site design to avoid impacts, and failure to consider a number of impacts to biological resources that would arise from the development, such as light and noise pollution.

2 Deferral of Mitigation

It is without question that the proposed project will have a significant impact on sensitive biological resources. The DEIR explains that the entire project footprint is Monterey Pine Forest, which is defined as a sensitive natural community by the State of California and is

protected by Monterey County as well. The DEIR then relies upon the idea of mitigation as the means by which impacts will be reduced to a level less than significant. The definition of the actions to be taken as mitigation, however, has been inappropriately deferred until a point later in the development process. For example, the loss of 2.7 acres of Monterey Pine Forest (a significant adverse impact) is presumed to be mitigated in part by the future creation of a forest management plan that has yet to be written. In addition, any impacts from discharging stormwater into jurisdictional wetlands are assumed to be mitigated by some measures that would be formulated in the future to comply with regulatory requirements of either the California Department of Fish and Wildlife (CDFW) or the U.S. Army Corps of Engineers. This second example of deferred mitigation is also problematic because compliance with regulatory obligations does not guarantee that impacts will be reduced to a level less than significant. In this instance, the extent of the impacts has not yet even been described, so any conclusions about whether regulatory compliance would mitigate those impacts are premature.

Developers can comply with regulations and their projects can still have significant impacts on the environment. Therefore, the DEIR errs in assuming that compliance with regulations when and if certain sensitive species are found will result in impacts to those species being reduced to a level less than significant. CEQA requires that the impacts be disclosed in the review process and that the mitigation measures be connected logically to the impacts in such a way as to demonstrate that they will be avoided or mitigated. By definition, for those impacts for which mitigation measures have been deferred, the public is denied the ability to comment on the adequacy of the mitigations, and the DEIR lacks the analytical clarity to conclude anything about the effectiveness of those measures.

3 Lack of Analytical Detail

The DEIR's analysis of biological resources, as a whole, lacks logical arguments connecting the descriptions of project impacts to the conclusions that those impacts will be reduced to a less than significant level.

Impacts to Monterey Pine Forest again provide a good example. The DEIR argues that the loss of 2.7 acres of Monterey Pine Forest is a significant impact, which would be a widely accepted conclusion. It also argues that the remaining 10.3 acres of Monterey Pine Forest at the project site would experience indirect impacts as a result of the proposed project and that these impacts would be significant as well. The DEIR then indicates that setting aside the 10.3 acres of remaining Monterey Pine Forest and implementation of a yet-to-be-written Resource Management Plan (RMP) would reduce these impacts to a less than significant level. As a result of other permits, the completion of the project would trigger conservation of other Monterey Pine Forest at another offsite location, but the preparers of the DEIR explicitly state that this is not compensatory mitigation and that the on-site mitigations (10.3-acre set-aside and RMP) are sufficient to offset the loss of 2.7 acres of the sensitive natural community.

The DEIR contains no logic explaining how or why these mitigations are sufficient to reduce the impacts to a less than significant level. It is not possible to assess the feasibility of the RMP because it is not yet written. That leaves the set-aside on site as the only quantifiable action. The implication of the conclusion put forth in the DEIR is that development of 20% of a sensitive natural community is acceptable so long as the remaining 80% is preserved. Could this

be applied to all natural communities protected under California regulations? Is it always acceptable to develop 200 acres out of 1,000 acres of a rare natural community? The DEIR is missing any analysis that would allow the reader to understand what percentage of a sensitive natural community lost to development would be significant. It appears that rather than having a rational basis, the preparers of the DEIR simply picked the percentage of the parcel left over after the housing project was designed and asserted that the impact was not significant so long as the remainder was set aside. The 20% protection therefore can be seen as being entirely an accidental consequence of the proposed project design.

A logical analysis would conclude that the loss of protected trees and sensitive natural community is not offset simply by setting aside that portion of a parcel that is left over. Even with the restrictions, 2.7 acres of a rare and sensitive vegetation type will be lost and the significant impacts will remain.

4 Inadequacy of Survey Effort

The project site supports a special-status plant community (Monterey Pine Forest) and is potential habitat for special-status plant species. Yet the surveys of the site did not follow the protocol required by the California Department of Fish and Wildlife (Department of Fish and Game 2009), as follows:

- The protocol requires that surveys be “floristic in nature, meaning that every plant taxon that occurs on site is identified to the taxonomic level necessary to determine rarity and listing status.” The biological surveys relied upon by the DEIR do not include a comprehensive plant list.
- The protocol states that, “Surveys should be comprehensive over the entire site, including areas that will be directly or indirectly impacted by the project.” The project surveys were “meandering” over the eastern part of the project and did not systematically survey the western portion because the surveyor believed that “no development is proposed there” (Letter report, Zander Associates, September 13, 2012). This is not consistent with CDFW requirements, especially because the project would construct a storm drain that could impact the western part of the site. Moreover, indirect impacts will occur beyond the footprint of the development so the status of species on this portion of the site is important.
- The protocol also has specific mapping and reporting requirements that are absent from the Zander Associates reports that are relied upon in the DEIR.

The botanical surveys therefore do not meet the generally accepted requirements to inform CEQA analysis and cannot be relied upon to support the conclusions made in the DEIR about the presence and condition of sensitive natural communities or sensitive species. The statement regarding sensitive plants in the DEIR that “these annual herbaceous plants are not present” (p. 3.3-17) is not supported by the evidence, because absence cannot be proven with the number and duration of surveys reported. For rare plants, it is often necessary to visit a site during different years with different climatic conditions to satisfy protocol requirements.

The project would potentially impact wetlands that could fall under the jurisdiction of the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife. For some reason, however, no jurisdictional delineation of wetlands was done to inform the DEIR (see p. 3.3-16). The Biological Communities map in the DEIR (Figure 3.3-1) simply indicates the location of “Sawmill Gulch” (0.2 acres). It should be obvious that “Sawmill Gulch” is not a biological community and the vegetation type should have been described and mapped, along with a map of the jurisdictional wetlands that might be impacted by the proposed project. Because the biological consultant failed to follow CDFW protocols for their surveys, basic information such as the extent and type of vegetation in Sawmill Gulch apparently was not available to the preparers of the DEIR. A spot check of vegetation seems to have been done (see p. 3.3-15), but not a wetland delineation.

No surveys for wildlife appear to have been done. The DEIR contains what are obviously generic and boilerplate descriptions of wildlife in the habitats at the project site (e.g., p. 3.3-15):

Birds such as orange-crowned warbler (*Vermivora celata*), rufous-sided towhee (*Pipilo erythrophthalmus*), California thrasher (*Toxostoma redivivum*), and California quail (*Callipepla californica*) feed and nest in shrubs. California mouse (*Peromyscus californicus*), brush rabbit (*Sylvilagus bachmani*), Heerman's kangaroo rat (*Dipodomys heermanni*), and brush mouse (*Peromyscus boylii*) find forage and cover in dense shrub cover, while narrow-faced kangaroo rat (*Dipodomys venustus*) favors sparsely vegetated openings within the thick vegetation. These small mammals are preyed upon by gray fox (*Urocyon cinereoargenteus*), bobcat (*Lynx rufus*), spotted skunk (*Spilogale* spp.), and western rattlesnake (*Crotalus viridis*). Shrubs also provide important forage and cover for resident black-tailed deer (*Odocoileus hemionus columbianus*).

This paragraph in particular serves as an example. It appears to be boilerplate because it uses an out of date scientific name for orange-crowned warbler, which is now placed in the genus *Oreothlypis* and has been since 2010 (Chesser et al. 2010), and because it describes a series of wildlife species that they could not have observed. The preparers of the DEIR only visited the site once for biological surveys (p. 3.3-12) and none of the other documents in the DEIR provided evidence of wildlife surveys. It is not possible that the biologists saw two species of kangaroo rat, gray fox, bobcat, spotted skunk (which is rarely this close to residential development), and western rattlesnake on a single visit in September 2014. The description of wildlife, therefore, is a composite generalization, constructed from lists of species that could be found in Monterey Pine Forest. By giving a generalized account of potentially present species, the preparers reveal that they actually know very little about the wildlife species that are found on site.

Methods are available to survey for wildlife and these could have been deployed at the project site. They include use of trail cameras for mid- and large-sized mammals, pitfall traps for reptiles and amphibians, Sherman traps for small mammals, acoustic bat detectors (which can determine species using computer analysis of echolocation calls), and other techniques. None of these was done, even though sensitive species that might have been located in this manner are likely to occur on the project site. Instead, all surveys for sensitive species were deferred until pre-construction (p. 3.3-2; see red-legged frog, legless lizard, and pallid bat mitigation measures). Pre-construction surveys are too late to do environmental assessment and cannot fulfill the goal of CEQA analysis, which is to *avoid* or mitigate impacts. If the distribution of

sensitive species on the project site is not assessed during the environmental review process, impacts to them cannot be avoided. It is not sufficient to argue, as is done in the DEIR, that impacts to these species will be mitigated if they are found during construction. By failing to provide wildlife and plant surveys adequate to describe the distribution of sensitive species on the project site, the DEIR fundamentally removes the option of redesigning the project within the site to avoid impacts. Instead, it locks in the impacts of the current design and provides for meaningless mitigations such as relocation of sensitive species if they are found during construction (see discussion below).

5 Failure to Use Site Design to Avoid Impacts

From a biological impacts perspective, the location of the project and its design within the site are poorly chosen. First principles from conservation planning would indicate that the design should be clustered and limited to the smallest footprint possible on the project site. Instead, the designers have placed the project footprint in the middle of the eastern portion of the site and use rare Monterey Pine Forest itself as a buffer between the project and the road and the project and nearby housing. The rare natural community should not be used as a buffer for a residential development because doing so maximizes the impacts of the development on sensitive biological resources. The proposed design creates more edge effects and habitat fragmentation than would a design in which the residential development is constructed up against the road. The existing configuration ensures that the maximum amount of the Monterey Pine Forest will be impacted by a range of disturbances associated with residential development, including lights (Rich and Longcore 2006), noise, fuel modification activities (Longcore 2003), and roaming pets (Loss et al. 2013).

The alternatives analysis is therefore deficient in that it does not evaluate the various alternatives for the configuration, location, and massing of the project on the site itself. Should the project site be chosen for the final project, this within-site configuration is most important to determining the impacts of the project. No effort is made to restrict the development to the portion of the site that is already most disturbed (see Figure 3.3-1).

6 Inadequate Assessment of Effects of Night Lighting on Wildlife

Artificial light at night can have a range of lethal and sub-lethal effects on wildlife (Longcore and Rich 2004, Rich and Longcore 2006, Gaston et al. 2012, Gaston et al. 2013, Meyer and Sullivan 2013), yet the MND only considers lighting as an aesthetic impact for people. Some wildlife species will avoid areas with additional lighting (Beier 1995, 2006, Stone et al. 2009, Stone et al. 2012) or otherwise be adversely impacted (Hölker et al. 2010a, Hölker et al. 2010b, Longcore 2010, Gaston et al. 2013).

The DEIR does not include any analysis of the impacts of night lighting on wildlife. All of the discussion of lighting is limited to aesthetics, even though some of the sensitive species that could be present on the project site (e.g., pallid bat, hoary bat) would be adversely impacted by introduction of lights to the site.

The DEIR concludes that the project design would not result in significant impacts from lighting, but this analysis is only to address impacts on the human experience and does not address

impacts on species and habitats. The site development standards specify that lighting “shall be unobtrusive, harmonious with the local area and constructed or located so that only the area intended is illuminated and offsite glare is fully controlled” (p. 3.1-3). This standard is far too vague to assess impacts on sensitive species and habitats. It contains no quantitative standards and the lighting analysis does not describe the levels of illumination and glare that will be experienced from within the project site where native habitats will remain. The lack of respect for this issue is shown by the project design, which uses existing native Monterey Pine Forest as a buffer between the road and the development and the DEIR suggests that additional native plantings will be used to shield the development from the road (DEIR, Section 3.1). Using a native habitat as an aesthetic shield implies that the habitat will be subject to light and glare above natural and/or background levels, which is absolutely unavoidable when a residential development is placed in the middle of a natural habitat.

7 Failure to Consider Impacts of Noise on Wildlife

The DEIR does not consider the effects of noise from the proposed project on wildlife, even though the project is situated in the middle of a sensitive natural community. The effects of noise on wildlife are increasingly well known (Barber et al. 2010, Halfwerk et al. 2011, Francis and Barber 2013, McGregor et al. 2013, Tennessen et al. 2014). A significant scientific literature can be found to document that noise has a range of adverse impacts on wildlife (see e.g., Slabbekoorn and Ripmeester 2008), including interference with communication of songbirds, distraction of prey species (making them more susceptible to predation), and a whole range of other adverse impacts (Barber et al. 2010, Chan et al. 2010, Laiolo 2010, Barber et al. 2011, Francis and Barber 2013). The combined noise, lights, and visual disturbance from the project would likely result in significant impacts to wildlife remaining in the project vicinity (Halfwerk and Slabbekoorn 2015).

8 Species Relocation Prior to Construction Is Not Mitigation

The approach to sensitive wildlife species in the DEIR is to defer surveys until immediately before construction and then, if sensitive species are found, to move any individuals outside the construction footprint and to call this mitigation. Let us be completely clear: relocating sensitive wildlife outside the construction footprint in this manner is not mitigation and has no benefit to the species. It simply avoids killing the animals directly while the habitat on which they depend is being destroyed. The adverse impacts to the species will still occur. The DEIR proposes this approach for legless lizard, California red-legged frog, hoary bat, and pallid bat.

Haphazard relocation (which is what the DEIR is proposing) is not an accepted mitigation measure for native wildlife. Relocation should only be undertaken as a last resort and then must be properly planned; successful relocation cannot occur as a result of surveys conducted 48 hours before construction. This is because the possible recipient sites for vertebrates such as legless lizards are often already occupied by the species and introduction of new individuals can result in detrimental intraspecific interactions. A recent scientific review explains this issue in detail (Sullivan et al. 2015). Any recipient site for relocated individuals would have to be unoccupied by the species (to avoid intraspecific interactions), and the density of the relocated individuals could not exceed the capacity of the habitat to support them. These things cannot be determined on the fly in front of the bulldozers.

Furthermore, the mitigation proposed for legless lizards suggests that 48 hours before construction biologists will undertake “systematic subsurface searching” to locate all legless lizards that might be in the construction area (p. 3.3-29). This borders on ludicrous. The soils at the project site are generally described as being sandy and therefore potential habitat for legless lizards. How does one search *underground* across 2.7 acres in 48 hours without harming the animals themselves? Mitigation measures must be feasible and effective to be approved by a lead agency, and this one is neither.

The legless lizard mitigation measure (p. 3.3-29) also suggests the construction of a subsurface “lizard fence” to keep legless lizards from re-entering the construction zone once they are dug up and tossed outside of it. Small fences to keep reptiles and amphibians in or out of areas are not an accepted mitigation measure in the scientific community and there is no reason to believe that a legless lizard fence will be effective. The DEIR has presented no evidence that it would be, and similar proposals have essentially been ridiculed by practicing herpetologists. Unless published evidence is provided to show that the proposed fence will be effective (including an estimate of the frequency of inspection and repair necessary to keep the fence impermeable to legless lizards and identification of the funding commitment by the project applicant), it should not be relied upon to reduce impacts. Even then, simply removing the animals from the construction footprint is not a mitigation measure at all because their habitat will have been destroyed and the fence will have no conservation benefit whatsoever to the species.

9 Subsidized Mesopredators

Development of housing on the project site will increase the number of “subsidized mesopredators” in the area. These are mid-sized predators, both non-native and native, such as cats, raccoons, and skunks, whose populations are increased, either intentionally or unintentionally, by humans. Increased abundance of domestic cats will decrease the potential for sensitive bird, small mammal, and reptile species to survive at the project site and in surrounding sensitive habitats. In a study of residents surrounding a natural habitat fragment in San Diego, 32% owned cats (1.7 on average), 77% of cat owners let their cats outside, and 84% of outdoor cats brought prey back to their human companions (Crooks and Soulé 1999). Each year, the average outdoor hunting cat returned 24 rodents (67% native species), 15 birds (95% native), and 17 lizards (100% native) to the home. The proposed project will construct 24 homes in the middle of a sensitive natural habitat, and extrapolation of data from San Diego means that 10 additional outdoor cats can be expected from these homes. Again extrapolating from the San Diego study, those 10 cats on average would kill 240 rodents (160 native), 150 birds (142 native), and 170 lizards (all native) *each year*. More recent research has shown that free-roaming cats kill about four times the number of prey items brought back to their homes (Lloyd et al. 2013), so these numbers could be four times greater. Given that populations of native birds on a 10-acre site may be measured in tens or hundreds, the effect of cats alone on bird populations on the project site will be catastrophic, let alone impacts on lizards and native rodents. The DEIR does not consider this impact or propose any mitigation.

10 Author Qualifications

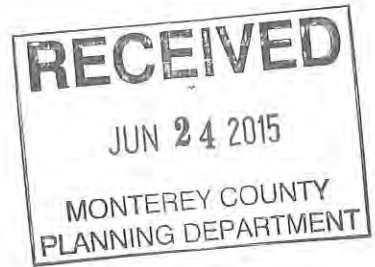
Dr. Travis Longcore and Catherine Rich are the principals of Land Protection Partners. Dr. Longcore is Associate Professor (Research) at the USC Spatial Sciences Institute and teaches in

the Landscape Architecture Program in the USC School of Architecture. At USC and previously at UCLA, he has taught, among other courses, Bioresource Management, Environmental Impact Analysis, Field Ecology, and Ecological Factors in Design. He was graduated *summa cum laude* from the University of Delaware with an Honors B.A. in Geography, holds an M.A. and a Ph.D. in Geography from UCLA, and is professionally certified as a Senior Ecologist by the Ecological Society of America. Catherine Rich holds an A.B. with honors from the University of California, Berkeley, a J.D. from the UCLA School of Law, and an M.A. in Geography from UCLA. She is Executive Officer of The Urban Wildlands Group and lead editor of *Ecological Consequences of Artificial Night Lighting* (Island Press, 2006) with Dr. Longcore. Longcore and Rich have authored or co-authored over 30 scientific papers in top peer-reviewed journals such as *Conservation Biology*, *Biological Conservation*, *Current Biology*, *Environmental Management*, and *Frontiers in Ecology and the Environment*. Land Protection Partners has provided scientific review of environmental compliance documents and analysis of complex environmental issues for local, regional, and national clients for 17 years.

11 Literature Cited

- Barber, J. R., C. L. Burdett, S. E. Reed, K. A. Warner, C. Formichella, K. R. Crooks, D. M. Theobald, and K. M. Fristrup. 2011. Anthropogenic noise exposure in protected natural areas: estimating the scale of ecological consequences. *Landscape Ecology* **26**:1281–1295.
- Barber, J. R., K. R. Crooks, and K. M. Fristrup. 2010. The costs of chronic noise exposure to terrestrial organisms. *Trends in Ecology & Evolution* **25**:180–189.
- Beier, P. 1995. Dispersal of juvenile cougars in fragmented habitat. *Journal of Wildlife Management* **59**:228–237.
- Beier, P. 2006. Effects of artificial night lighting on terrestrial mammals. Pages 19–42 in C. Rich and T. Longcore, editors. *Ecological consequences of artificial night lighting*. Island Press, Washington, D.C.
- Chan, A. A. Y.-H., P. Giraldo-Perez, S. Smith, and D. T. Blumstein. 2010. Anthropogenic noise affects risk assessment and attention: the distracted prey hypothesis. *Biology Letters* **6**:458–461.
- Chesser, R. T., R. C. Banks, F. K. Barker, C. Cicero, J. L. Dunn, A. W. Kratter, I. J. Lovette, P. C. Rasmussen, J. Remsen Jr, and J. D. Rising. 2010. Fifty-first supplement to the American Ornithologists' Union check-list of North American birds. *The Auk* **127**:726–744.
- Crooks, K. R., and M. E. Soulé. 1999. Mesopredator release and avifaunal extinctions in a fragmented system. *Nature* **400**:563–566.
- Department of Fish and Game. 2009. Protocols for surveying and evaluating impacts to special status native plant populations and natural communities. State of California, California Natural Resources Agency.
- Francis, C. D., and J. R. Barber. 2013. A framework for understanding noise impacts on wildlife: an urgent conservation priority. *Frontiers in Ecology and the Environment* **11**:305–313.
- Gaston, K. J., J. Bennie, T. W. Davies, and J. Hopkins. 2013. The ecological impacts of nighttime light pollution: a mechanistic appraisal. *Biological Reviews* **88**:912–927.
- Gaston, K. J., T. W. Davies, J. Bennie, and J. Hopkins. 2012. Reducing the ecological consequences of night-time light pollution: options and developments. *Journal of Applied Ecology* **49**:1256–1266.

- Halfwerk, W., L. J. M. Holleman, C. M. Lesselis, and H. Slabbekoorn. 2011. Negative impact of traffic noise on avian reproductive success. *Journal of Applied Ecology* **44**:176–184.
- Halfwerk, W., and H. Slabbekoorn. 2015. Pollution going multimodal: the complex impact of the human-altered sensory environment on animal perception and performance. *Biology Letters* **11**:20141051.
- Hölker, F., T. Moss, B. Griefahn, W. Kloas, C. C. Voight, D. Henckel, A. Hänel, P. M. Kappeler, S. Völker, A. Schwoppe, S. Franke, D. Uhrlandt, J. Fischer, R. Klenke, C. Wolter, and K. Tockner. 2010a. The dark side of light: a transdisciplinary research agenda for light pollution policy. *Ecology and Society* **15**:article 13.
- Hölker, F., C. Wolter, E. K. Perkin, and K. Tockner. 2010b. Light pollution as a biodiversity threat. *Trends in Ecology and Evolution* **25**:681–682.
- Laiolo, P. 2010. The emerging significance of bioacoustics in animal species conservation. *Biological Conservation* **143**:1635–1645.
- Longcore, T. 2003. Ecological effects of fuel modification on arthropods and other wildlife in an urbanizing wildland. Pages 111–117 in N. G. Sugihara, editor. National congress on fire ecology, prevention and management proceedings. Tall Timbers Research Station, Tallahassee, FL.
- Longcore, T. 2010. Sensory ecology: night lights alter reproductive behavior of blue tits. *Current Biology* **20**:R893–R895.
- Longcore, T., and C. Rich. 2004. Ecological light pollution. *Frontiers in Ecology and the Environment* **2**:191–198.
- Loss, S. R., T. Will, and P. P. Marra. 2013. The impact of free-ranging domestic cats on wildlife in the United States. *Nature Communications* **4**:1396.
- Loyd, K. A. T., S. M. Hernandez, J. P. Carroll, K. J. Abernathy, and G. J. Marshall. 2013. Quantifying free-roaming domestic cat predation using animal-borne video cameras. *Biological Conservation* **160**:183–189.
- McGregor, P. K., A. G. Horn, M. L. Leonard, and F. Thomsen. 2013. Anthropogenic noise and conservation. Pages 409–444 in H. Brumm, editor. *Animal Communication and Noise*. Springer-Verlag, Berlin.
- Meyer, L. A., and S. M. P. Sullivan. 2013. Bright lights, big city: influences of ecological light pollution on reciprocal stream–riparian invertebrate fluxes. *Ecological Applications* **23**:1322–1330.
- Rich, C., and T. Longcore, editors. 2006. *Ecological Consequences of Artificial Night Lighting*. Island Press, Washington, D.C.
- Slabbekoorn, H., and E. A. P. Ripmeester. 2008. Birdsong and anthropogenic noise: implications and applications for conservation. *Molecular Ecology* **17**:72–83.
- Stone, E. L., G. Jones, and S. Harris. 2009. Street lighting disturbs commuting bats. *Current Biology* **19**:1123–1127.
- Stone, E. L., G. Jones, and S. Harris. 2012. Conserving energy at a cost to biodiversity? Impacts of LED lighting on bats. *Global Change Biology* **18**:2458–2465.
- Sullivan, B. K., E. M. Nowak, and M. A. Kwiatkowski. 2015. Problems with mitigation translocation of herpetofauna. *Conservation Biology* **29**:12–18.
- Tennessen, J. B., S. E. Parks, and T. Langkilde. 2014. Traffic noise causes physiological stress and impairs breeding migration behaviour in frogs. *Conservation Physiology* **2**:cou032.



Supervisor Dave Potter
1200 Aguajito Road #1
Monterey, CA 93940
Copy to Supervisor Jane Parker
6-11-2015

RE: Inclusionary Housing, Pebble Beach

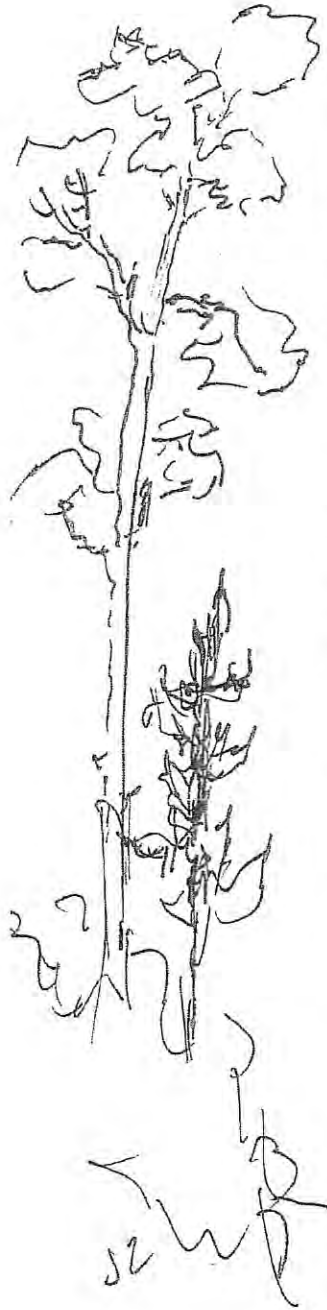
Dear Supervisor Potter,

Monterey Pine Trees are one of the things that make our area so beautiful. As much as I approve inclusionary housing in Pebble Beach, I would hope that it would be on a site where the fewest Pines would be destroyed.

Thank you for your continued care and concern for the environment of our treasured area.

A handwritten signature in black ink, appearing to read "Jan Penney Zeigler".

Jan Penney Zeigler
1460 Ord Grove Ave
Seaside, CA 93955
janpenney@pacbell.net



Gonzales, Eva x5186

From: greg zimmerman [gjz@sbcglobal.net]
Sent: Tuesday, May 05, 2015 5:26 PM
To: ceqacomment
Subject: Pebble Beach Inclusionary Housing a Mistake for the Forest

PLN130447

Allowing the Pebble Beach Inclusionary Housing project to be built in Pebble Beach is a environmental mistake. There are far less sensitive areas to build the project where the Monterey Pine ecosystem won't see additional degradation. When you fail to prioritize something precious it goes away. The forest is already going to be impacted by many new housing sub divisions as well as new hotel and hotel addition at Spanish Bay.

Please do the responsible thing and protect the rare and diminishing eco system of Pebble Beach for future generations and require that the project be built in a far more suitable spot.

Thank you
Greg Zimmerman
Managing Partner
Monterey Peninsula
Proudly serving the Peninsula for 25 years
831-901-7770

