



Post Office Box 1876
Salinas, CA 93902-1876
831-759-2824
Website: www.landwatch.org
Email: landwatch@mclw.org
Fax: 831-759-2825



April 3, 2014

California Coastal Commission
45 Fremont Street
Suite 2000
San Francisco, CA 94105-2219
montereybayshoresresort@coastal.ca.gov

Subject: W 10.a., T 6.a., and F 6.a. Application No. A-3-SNC-98-114 (SNG Inc.,
Monterey Bay Shores Resort, Sand City)

Dear Commissioners:

LandWatch Monterey County has participated in the review of the Monterey Bay Shores Resort since 2008. We have consistently raised concerns about the project's potential impacts to traffic circulation, the viewshed, coastal erosion, and the habitat of the sand dunes. We now have additional concerns of cumulative impacts because of another resort proposal also on the west side of Highway 1 in Sand City.

LandWatch reviewed the Coastal Commission staff report for the April 2014 hearings and has the following comments:

1. Cumulative Impacts: The cumulative impacts of the Monterey Bay Shores Resort and the Collection at Monterey Bay would be significant. The Monterey Bay Shores Resort includes 368 residential and visitor-serving units and 947 parking places. The Collection project includes a 139 room hotel and a 203 room resort, and 758 parking spaces. Combined, these projects would include 710 residential and visitor serving units and over 1,700 parking spaces all on the west side of Highway 1. The proposal for the Monterey Bay Shores Resort should address and mitigate cumulative impacts.
2. Significant Cumulative Traffic Impacts: The projects would significantly impact both local roads and Highway 1. While projects would be required to pay the Transportation Agency of Monterey County's regional impact fee, there are no plans scheduled or funds available to widen affected segments of Highway 1 (Draft 2035 MTP/SCS and RTPs for Monterey, San Benito and Santa Cruz Counties). Transportation Demand Management programs that would limit parking and require use of public transportation and carpooling should be added as a condition for the Monterey Bay Shores project.

3. Significant Cumulative Viewshed Impacts: Both projects would adversely affect the viewshed particularly views from Highway 1. The Monterey Bay Shores project should be further modified to reduce viewshed impacts.
4. Coastal Erosion and Sea Level Rise: Both projects would be subject to coastal erosion. Mitigation measures proposed by the Coastal Commission staff for the Monterey Bay Shores Resort and by Sand City staff for the Collection project include removal of those portions of each project as erosion approaches. The Monterey Bay Shores project should be further modified to eliminate those units subject to future erosion.
5. Climate Change: Greenhouse Gas Emissions generated by both projects should be quantified and mitigation measures adopted if the impacts would be significant.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy L. White', written in a cursive style.

Amy L. White
Executive Director