



May 13, 2015

Joseph Sidor, Associate Planner  
Monterey County Planning Department  
168 West Alisal St., 2<sup>nd</sup> Floor  
Salinas, CA 93901

SUBJECT: DEIR FOR PEBBLE BEACH COMPANY INCLUSIONARY HOUSING  
PROJECT

Dear Mr. Sidor:

LandWatch reviewed the referenced document for a Use Permit and Design Approval to allow the construction of 24 affordable housing units (units ranging in size from 1,078 square feet to 1,343 square feet), including patios and decks, carport with small storage closet for each unit, and a 498 square foot manager's office building. We have the following comments:

### **Aesthetics**

1. The DEIR finds that 135 Monterey Pines and 590 oak trees would be removed (3.1-9). Mitigation Measures AES-B1 recommends replanting native shrubs to mitigate visual impacts (p. 3.1-13). We also note that Mitigation Measures Bio 1-A1 requires replacement of the Monterey Pines and oaks trees on a one to one basis with many replanted on-site which would also mitigate aesthetic impacts.

### **Air Quality**

2. The Monterey Bay Unified Air Pollution Control District (MBUAPCD) as part of its consistency determination finds there are 2,700 residential units that have been approved and are unconstructed in unincorporated Monterey County (p. 3.2-15). Our data show there are approximately 3,251 units for the same jurisdiction as follows (Note: the following data do not include all lots of record):

East Garrison - Phase II/III	993
Morisoli-Amaral	319
Rancho San Juan	1,147

September Ranch	95
Ferrini Ranch	212
Harper Canyon	27
Santa Lucia Preserve	335
Pebble Beach Units	100
County approved new SFDU-2014	<u>23</u>
	3,251

While the preceding data do not change the finding of consistency with the AQMP, it should be provided to the MBUAPCD for a response.

3. The DEIR identifies the CO significance threshold as 550 lbs per day. The threshold is only applicable to stationary sources, not mobile sources, as indicated in Table 3.2-6.

### **Alternatives**

4. The DEIR finds the payment of in-lieu fees could result in greater impacts than the proposed project (p. 5-11) since development off-site using in-lieu fees could be added to development of the project site consistent with zoning. In other words, in addition to using in-lieu fees to build the affordable housing somewhere else, the project site could be used for additional housing thus resulting in the affordable housing plus what would be built at the proposed site. It should also be noted that in-lieu fees do not necessarily result in off-site housing per County Planning staff comments. This is why in 2012 LandWatch worked to ensure the mandated affordable units be built by the Pebble Beach Company, rather than the County allowing in-lieu fees be paid.

Additionally, as noted in the alternatives analysis the unavailability of water outside the Del Monte Forest area would render construction of off-site affordable housing even more problematic.

5. The DEIR identifies Alternative 4 (Collins Residential Area) with affordable housing only as the Environmentally Superior Alternative. The DEIR states (p. 5-42), "This alternative has better access to public transit in Pebble Beach than the Project because it is 0.25 mile from MST Bus Route 21 (Pebble Beach-Salinas Express), which could transport Pebble Beach employees directly to other portions of Pebble Beach. However, this alternative is further than the Project to other MST bus routes (like MST Route 2)."

Please address access from the Collins Residential Areas to shopping, jobs outside of the Del Monte Forest and Pacific Grove public schools in comparison to the proposed project.

### **Jobs/Housing Balance**

6. Please address the affect the proposed project would have on the overall jobs/housing balance for Monterey County and its relationship to traffic generation and air quality.

## Biology

7. BIO-A1 requires development and implementation of a site specific resource management plan for the Project's open space preservation area, and BIO-A2 requires dedication of conservation easements to the Del Monte Forest Conservancy for the open space preservation areas. We recommend adoption of these mitigation measures which would preserve over 10 acres of the site for permanent protection. Without BIO-A2, the entire site could be developed under existing land use designation.

Thank you for the opportunity to comment on the DEIR.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy L. White', with a stylized, cursive script.

Amy L. White  
Executive Director