



Post Office Box 1876, Salinas, CA 93902

Email: LandWatch@mclw.org

Website: www.landwatch.org

Telephone: 831-759-2824

FAX: 831-759-2825

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Monterey County Planning Department
168 West Alisal Street, 2nd Floor
Salinas, CA 93901
CEQAComments@co.monterey.ca.us

Dear Staff:

LandWatch Monterey County has reviewed the project which is for build-out of the remaining undeveloped Pebble Beach Company (PBC) properties in the Del Monte Forest Local Coastal Plan (LCP) area. The project includes the following major activities:

- Expanding meeting facilities by 13,815 sq. ft.
- Adding 195 guest units.
- Constructing a two-level 224-space parking facility and 285-space parking lot.
- Collins Field-Equestrian Center: relocating driving range to Collins Field, constructing golf academy, demolishing existing equestrian center and constructing a new center.
- Adding 28,797 sq. ft. of commercial space.
- Creating 98 residential lots.
- Road improvements at SR1/SR68/17; Congress Road/17 Mile Drive; Congress Road/Lopez Rd; Lopez Road/Sunridge Rd and Portola Rd/Stevenson Drive.
- Trail and infrastructure improvements.
- Preserving 635 acres of dedication and conservation areas.
- Removing about 5,500 Monterey Pines, 952 Coast Live Oak and 35 other tree types for a total of 6,500 to 6,700 trees.
- Over 125 amendments or deletions to the Del Monte Forest LCP.

In addition to the proposed project, changes to the Poppy Hills Golf course are proposed including removal of 533 trees under a separate application.

Our comments follow:

1. The DEIR should address why the proposed project is being processed separately from the Poppy Hills Golf course project. Since the combined projects would require removal of over 7,000 trees and generate significant greenhouse gas emissions, they should be processed together. At a minimum, the cumulative impacts of both projects must be addressed, and the revised environmental documents for both projects should be re-circulated.

2. Air Quality

- A. P. 3.2-17 and 3.2-28. The methodology for determining project consistency with the 2008 AQMP was changed in September 2011. See the MBUAPCD website for the revised Consistency Procedure 4.0. Under the new procedure, project dwelling units are added to base year units and approved and unconstructed dwelling units for unincorporated Monterey County. This number is then compared to the number of units forecast by AMBAG at the year of build-out. Please identify the approved and unconstructed projects in your response.
- B. Table 3.2-6, p. 3.2-19. The title identifies emissions as lbs/day, yet the table itself indicates lbs/year. This inconsistency should be clarified.
- C. P. 3.2-25. The DEIR finds the impact of diesel exhaust emissions on sensitive receptor would be significant for construction at all project development sites, except Area M Spyglass Hill and the Residential Lot Subdivision at the Corporation Yard, where the impact would be less than significant. The proposed mitigation measure (AQ-D1) would require the applicant to ensure that construction contractor(s) retrofit and install diesel particulate filters (DPFs) capable of achieving an 85% reduction in PM10 exhaust emissions (Tier 3) on all off-road construction equipment and diesel oxidation catalysts and Tier 3 DPFs on all on-road soil hauling. The DEIR finds this measure would reduce impacts to less than significant. Data should be provided that substantiate this finding.

3. Biological Resources

- A. The DEIR recommends numerous mitigation measures to address impacts on biological resources. We support these recommendations and urge that they be included as project conditions.

4. Traffic

- A. P. 3.11-11. The proposed project would amend the LUP to delete Policy 113 which follows in part:

The Resource Constraint Area designation shall be removed only when water and sewer capacity sufficient to serve such development becomes available and that highway capacity and circulation solutions have been agreed upon and adopted. Until such time that resource problems are solved, there shall be no development other than existing lots of record.

The DEIR addresses traffic circulation problems existing at the time the LUP was adopted and finds these problems have been addressed. This finding is intended to support deletion of Policy 113. However, the DEIR finds that the proposed project would add substantial traffic to intersections in Del Monte Forest and the immediate vicinity; decrease acceptable levels of service to unacceptable levels or worsen existing unacceptable levels of service; and have both project level and cumulative significant and unavoidable impacts. P. 3.11-2 The DEIR also finds the project would add traffic to regional highway sections that are projected to operate at unacceptable levels of service and would add traffic to a highway ramp projected to operate at an unacceptable level of service. These impacts are found to be unavoidable and significant at the project level and cumulatively. Based on

findings in the DEIR, deletion of Policy 113 is not supported, and in fact, its deletion would have significant unavoidable impacts.

- B. The DEIR identifies significant and unavoidable project level and cumulative impacts on regional roadways. While the DEIR states the applicant will contribute its fair share of regional impact fees, impacts are found to be significant and unavoidable until such time as proposed mitigation measures are implemented. Further, the DEIR identifies proposed regional transportation projects that do not have funding in the foreseeable future and finds the project's contribution to regional fees will not mitigate significant impacts.

We note that previous EIRs prepared for the County have made different findings, notably that regional traffic impacts would be mitigated with payment of regional impact fees. The analysis for this project is consistent with CEQA requirements regarding mitigation measures, and we support this updated approach for analyzing regional traffic impacts and mitigation.

5. Water Supply

- A. P. 3-2.2. The DEIR finds that water is available for the project through 2016; after that time, additional water would be needed from new sources. It finds that a significant and unavoidable impact on water supplies if the Regional Project is not built by then. It also finds that regional water supply infrastructure and operations would have secondary environmental impacts. Mitigation measures are not identified for these impacts.

As noted above, Policy 113 which addresses traffic, water and sewer capacities would be deleted. According to the DEIR, the proposed substitute LCP Amendment prescribes that development in the Del Monte Forest can only be approved if it is first clearly demonstrated that the development will be served by an adequate, long-term public water supply, and where such development incorporates all necessary measures to assure no net increase in water demand from Cal-Am sources where extraction is leading to resource degradation. The only exception would be the remaining portion of the applicant's water entitlement consistent with the SWRCB Cease and Desist Order. The specific LCP amendment language is not provided in the DEIR. However, the DEIR states:

New text describes that concept plan development can use water from the Pebble Beach Water Entitlement and that adequate water is available to meet expected demand. P. 2-36.

As noted above, there is not a long-term water supply available to serve the project. The inconsistency between this finding and the statement on P. 2-36 should be addressed.

6. Climate Change

- A. The DEIR attempts to use the County's GHG emission reduction policy (OS-10.11) described in the 2010 Monterey County General Plan to address the project's impact on climate change. The DEIR states:

On the county level, the County has identified its 2020 target to be to reduce GHG emissions by 15% below 2005 levels by 2020. The County 2005 emissions of approximately 1.71 million MT CO₂e are projected to increase to 1.91 million MT CO₂e by 2020, which is an increase of approximately 11%. Using the draft inventory data, the county's target would correspond to 1.5 million MT CO₂e, which is approximately 24% below 2020 BAU conditions. *Typos not added.* P. 3.4-14

The source of the 2005 and 2020 emission inventory is not provided in either the DEIR or the Air Quality and Climate Change Appendix. The 2009 AMBAG Update shows the 2005 GHG emission inventory at 1.3 million MT CO₂e (excludes pass-through traffic). AMBAG has not prepared an updated 2020 forecasts. (Telecom 12/15/11, Chris Sentieri, AMBAG). The DEIR should use up-to-date data and revise its analysis accordingly.

- B. For purposes of the DEIR, project level GHG emissions are considered significant if they are more than 76% of unmitigated emissions level. If project level emissions are reduced by more than 24%, they would not be significant. P. 3.4-15.

If project levels emissions are accounted for in the 2020 emission forecast for Monterey County, this approach would be consistent with the adopted County policy. However, the DEIR does not address consistency between project level emissions and the 2020 forecast of 1.91 million MT CO₂e.

The DEIR finds the project would emit between 4,056 to 5,468 MT CO₂e in excess of baseline and that with mitigation, emissions would be reduced by more than 24% and would have less than a significant impact. If these emissions are in excess of the 2020 Monterey County forecast, they would have an unavoidable and significant cumulative impact on climate change.

- C. Instead of using the method described above, guidelines adopted by the BAAQMD should be used to address climate change. While MBUAPCD has not approved GHG thresholds of significance, it has draft guidelines under preparation. These guidelines are similar to those adopted by the BAAQMD. The DEIR states:

The State CEQA Guidelines do not define the amount of GHG emissions that would constitute a significant impact on the environment. Instead, they leave the determination of the significance of GHG emissions up to the lead agency and authorize the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts,

provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (State CEQA Guidelines 15064.4[a], 15064.7[c]). P. 3.4-14

Since neither the County of Monterey nor MBUAPCD have established thresholds of significance nor has the County identified an approach pursuant to these CEQA Guidelines, we believe the methodology adopted by the BAAQMD should be used to estimate the impact of GHG emissions on climate change.

- D. The adopted BAAQMD threshold of significant for land use projects is

4.6 metric tons CO₂e/year/service pop

Using this threshold, the project may have a significant and unavoidable cumulative impact on climate change.

- E. Emissions from disposal of the 6,000 plus trees are averaged over a 100 year period. Since development would occur at a much more rapid rate, the use of a 100 year average should be justified (Table 3.4-8). Also, the emission estimate is based on the assumption that the trees will be chipped (p. 3.4-23). Since there is no condition requiring chipping and since burning is the other disposal method, the estimate of emissions from disposal should be revised to reflect both burning and chipping.

- F. The DEIR includes a mitigation measure to validate the greenhouse gas emission offset value of preserving 598 acres of Monterey pine forest. P. 3.4-27. It states that the existing LCP designates most of these areas for development. The DEIR further states, “For project to qualify[for the Climate Action Reserve], it must be demonstrated that the project has a feasible and realistic potential for development and loss of the forested lands that would occur in the long run without the proposed preservation.”

Policy 113 as described above would limit development on these acres into the foreseeable future.

- G. Also, the methodology for evaluating impacts on climate change from the Pebble Beach Company project and the Poppy Hills Golf course project are inconsistent. This discrepancy should be addressed.

7. Alternatives Analysis

- A. The DEIR indicates that residential development has the greatest impacts on biological resources. Up to 4,605 Monterey Pines would be removed by residential lot subdivisions. P. 3.4-20.

Three Clustered Development and three Reduced Development Alternatives are evaluated. All alternatives are identified as meeting most of the project objectives. Table 5-1.

All three Clustered Development Alternatives (1A-1C) would include 90 residential units and 18 units of inclusionary housing. All would reduce impacts to the Monterey Pine Forest and Yadon's piperia over the proposed project. Alternative 1C is identified as reducing Monterey Pine Forest acres by 3.49 and Yadon's piperia by 3.3 acres. P. 5-13. However, these data conflict with data in Table 5-6 which show a total of 9.00 fewer acres of Yadon's piperia affected for a total of 12.49 acres.

Three Reduced Development Alternatives (2A-2C) would include fewer residential and inclusionary housing units. Alternative 2A would reduce impacts on Monterey Pine Forest by 8 acres and Yadon's piperia by 4 acres; Alternative 2B would reduce impacts by 14 acres and 4 acres, respectively; Alternatives would reduce impacts by 24 acres and 7 acres respectively.

Alternative 2C is identified as the Environmentally Superior Alternative. P. 5-35. However, the text states, "...the environmentally superior "action" alternative is Alternative 2C (**Clustered Development Alternative C**)...". (emphasis added). The Clustered Development Alternative is 1C. Is the referenced alternative 1C or 2C?

- B. Reducing the number of trees to be removed would affect estimates of GHG emissions. The impact on GHG emissions should be quantified for each of the residential alternatives.
- C. The DEIR finds that a roundabout at the SR 68/SR 1/17-Mile Drive Interchange would not address significant impacts. PP. 5-6 and 5-26. Given the potential of significant cumulative impacts on climate change as addressed above, a roundabout at that interchange would reduce GHG emissions as well as ozone precursor emissions.
- D. Existing comparative studies of signalized intersections versus roundabout intersections indicate substantial reductions in vehicle emissions especially during the A.M. and P.M. peak hours when heavy traffic occurs.¹ The basis for the vehicle emissions reduction is that roundabouts allow continuous vehicle flow and no, or very little, vehicle stops. Studies show that modern roundabouts have less delay, queing and stopping than standard signalized intersections. In one comparative analysis between the two types of intersections, as reported in *Impact of Modern Roundabout on Vehicular Emissions*,² the conclusions are as follows:
 - There was a (21 percent to 42 percent) decrease in the Carbon Monoxide (CO) emissions (Kg/hr) for the AM and PM periods after the installation of a modern roundabout.
 - There was a (16 percent to 59 percent) decrease in the Carbon Dioxide (CO2) emissions (Kg/hr) for the AM and PM periods after the installation of modern roundabout.

¹ When vehicles are idle in a queue they emit about 7 times as much carbon monoxide (CO) as vehicles traveling at 10 mph. Source: refer to footnote #2.

² <http://www.ctre.iastate.edu/pubs/midcon2003/MandavilliRoundabouts.pdf>;
https://www.dot.ny.gov/main/roundabouts/files/Emissions_Reduction.pdf

- There was a (20 percent to 48 percent) decrease in the Oxides of Nitrogen (NOx) emissions (Kg/hr) for the AM and PM periods after the installation of modern roundabout.
 - There was a (18 percent to 65 percent) decrease in the Hydrocarbons (HC) emissions (Kg/hr) for the AM and PM periods after the installation of modern roundabout.
 - Reduction in delays, queues and proportion of vehicle stopped at the intersection in the case of roundabouts suggest that roundabouts enhanced the operational performance of the intersections and account for the reduction in vehicular emissions.
 - Since all the locations had a range of different traffic conditions, it is reasonable to suggest that a modern roundabout may be the best intersection alternative to reduce vehicular emissions for several other locations in Kansas with similar ranges of traffic volumes.
- E. The DEIR reports that the LOS improves with roundabouts for the 2015 and 2030 conditions as compared to the signalized intersections. PP 5-32; Table 5-4
- F. The DEIR reports substantially less vehicle queues with the roundabout for 2015 and 2030 conditions as compared to signalized intersections. PP 5-33; Table 5-5
- G. In addition to the superiority of roundabouts in reducing greenhouse gas emissions there are other significant advantages to roundabouts. Roundabouts have resulted in a 90 percent reduction in fatal and incapacitating accidents, regardless of the lack of familiarity by drivers with this type of intersection design. As compared to signalized intersections, injury accidents are reduced by 76 percent and overall intersection accidents are reduced by 35 percent because there are substantially fewer collision points in the design of a roundabout.

The deaths in Monterey County that are the result of vehicle collisions at standard, all-way stop-controls such as signalized intersections can be eliminated by constructing roundabouts.

Roundabouts perform more favorably when compared to conventional intersections in terms of improved safety, increased capacity, reduced overall delay, and improved aesthetics. This is because they have specific design and traffic control features including yield control for entering traffic, channelized approaches, and appropriate curvature to ensure safe travel speeds. They are self regulating as to speed and access to the intersection by the drivers. Roundabouts are also more cost effective in that they preclude the cost of signalization and maintenance of signals, and they reduce society's overall insurance costs through fewer accidents and fewer deaths and incapacitating injuries.

Thank you for the opportunity to review the document.

Sincerely,



Amy L. White
Executive Director