



CITY OF PACIFIC GROVE

Community and Economic Development Department

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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 the opportunity to comment on the Pebble Beach Company Inclusionary Housing Project Draft Environmental Impact Report (DEIR). The City of Pacific Grove and the Pebble Beach community have a long inter-woven history. As you know many Pebble Beach residents send their children to Pacific Grove schools, utilize a variety of City services and infrastructure, work in Pacific Grove, as well as support our local businesses. Therefore, when reviewing the Draft EIR we found items that raise concerns over the adequacy of how some important environmental impacts on the City of Pacific Grove are being addressed.

The City and residents of Pacific Grove support inclusionary housing and believe there is a greater need for similar housing throughout the Monterey Peninsula. We are about to embark on the update of our own Housing Element and know that every community must do its part to support various segments of our population.

As you know, the housing project constitutes a fundamental change to the character of the immediate neighborhood, both in Pebble Beach and Pacific Grove. Subsequently, we feel the EIR could better address a number of project-related impacts and burdens on residents of both communities. Our request is that the final EIR contain more tangible mitigations that encourage a sharing of mutual responsibilities between Pebble Beach and Pacific Grove to reduce any degradation of neighborhood infrastructure and character.

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

Section 3.1 Aesthetics

The proposed project will change the visual character of the area forever. The forested area will be replaced with four, two-story attached multi-family dwellings significantly changing the surrounding neighborhood context. Additionally, nuisance light would be generated from outdoor lighting on both the proposed residences, and the large parking area. The light and glare could significantly impact any endangered and special status species in the adjacent forested areas as well as adjacent local residents.

Please amend the Draft EIR to address the light and glare impacts on endangered and special status species in the adjacent forested areas. There are a number of design mitigations that could be employed to assure this happens.

Section 3.3 Biological Resources

As urban planners, we can agree that the Area D proposal has the potential to significantly alter and degrade the site's environmental setting. We do not believe the Draft EIR has suggested enough tangible design mitigations to reduce the impact of removal of forested area on the immediate vicinity. While the significant dedication of land in another location helps balance the total impact, there needs to be more attention on how the immediate site environs are mitigated to reduce significant adverse impacts.

Please revise the Draft EIR to address the systematic removal of forested areas in the vicinity of the project site. We believe that the tree replacement mitigation is inadequate. Please include a revised mitigation that requires a broader spectrum of replacement tree sizes.

Section 3.8 Land Use and Recreation

Land Use

The predominant land use and housing pattern adjacent to the subject site is single-family detached residences. The proposed site, Area D, is zoned for 31 detached single family homes. The proposed two-story townhomes with proposed carports and surface parking area is inconsistent with the existing development massing, scale, grading and style of development.

Please revise the EIR to include analysis and mitigations which explore alternative housing types such as courtyard housing or bungalow duplexes. This type of project design is reminiscent of more traditional neighborhood design and permits a greater degree of design with nature.

Recreation

The impacts on the City's local park system were not adequately addressed. Recreation areas analyzed were limited to Regional Recreational Facilities, Trails, and Preservation Areas. The proposed location is adjacent to Pacific Grove and the nearest improved City park is Arnett Park and is proximate to the City's Rip Van Winkle Open Space preserve, neither of which were addressed. Additionally, there was no discussion on the impacts to City offered Recreation Department courses and camps.

Please revise the EIR to address impacts on the City's Park System.

Section 3.10 Public Services and Utilities

Library

The City of Pacific Grove has a well-used library system. Pebble Beach residents are members of the City's library system and actively use City library resources. The City's library and potential impacts were not evaluated in the Draft EIR.

Please revise the Draft EIR to include an evaluation of the impacts on the City's library system and include mitigations as appropriate.

Emergency Access

The analysis of emergency access and evacuation is lacking in detail and specifics. In a regional emergency, such as wildfire, where evacuation may be required, routes out of the Peninsula are limited and already congested. The EIR did not address this major transportation issue.

Please revise the Draft EIR to include a discussion of emergency evacuation routes in the event of a regional emergency such as wildfire, and include related mitigations that would be shared with the City.

Section 3.11 Transportation and Circulation

The proposed project will result in significant and unavoidable transportation and circulation impacts which are of concern to the City of Pacific Grove.

Please revise the Draft EIR to include an evaluation of the traffic impacts on Lighthouse Avenue. Lighthouse Avenue is the primary corridor for both Pacific Grove and Pebble Beach Country Club East residents to access the commercial and recreational services in downtown Monterey. The additional impacts to the Lighthouse Avenue corridor should be evaluated and addressed.

Please revise the Draft EIR to include an evaluation of the impacts on the City's roadway system, particularly David Avenue and Forest Avenue, and include mitigation

measures that require fiscal collaboration with Pacific Grove on eventual improvements.

Pedestrian Facilities.

The area in general, both in Pebble Beach and in Pacific Grove, is deficient in pedestrian infrastructure. There are limited sidewalks and walking paths in this area. Currently, pedestrians walk in the road and the proposed project will worsen the situation by increasing the number of pedestrians in the area using the street to walk in.

The project would add to the City of Pacific Grove's liability burden by adding more families and other pedestrians walking in the street. The proposed mitigation in the Draft EIR does not adequately address the safety impacts to residents of the proposed project.

The existing pedestrian safety problems are made worse along Congress Road near the project site by a semi-blind curve on Congress Road at Ortega Road;

Mitigation measures in the Draft EIR should include a broader discussion of the range of pedestrian issues, such as:

1) safe walkways along David Avenue to Forest Avenue, and a walkway along Congress Avenue to Sunset Avenue to facilitate a safe route to Monterey Bay Charter School, Forest Grove Elementary School, and Pacific Grove High School; to the bus stops along David Avenue; as well as to the commercial shopping areas located at Country Club Gate and Forest Hill; and,

2) safe walkways along the length of Congress Road from SFB Morse Drive to Forest Lodge Road, and along Forest Lodge Road from Ortega Road to Country Club Gate.

Chapter 4 Alternatives

The City of Pacific Grove appreciates that six alternatives were evaluated in the EIR; however we cannot concur with the selection of Area D as the most desirable. Area D is currently vacant open space with the potential to create a myriad of irreversible biological consequences. We realize that Area D is zoned for and is still eligible to have 31 single family detached units built. We submit that the development footprint for an apartment complex requires considerably more mass grading and total tree devastation.

This level of devastation would not occur with the site specific design of several homes on their own individual parcels.

The site at 17th and Sunset should be reevaluated for consideration as the preferred site. This site has been developed with urban uses. The amount of environmental consequences has already occurred on this site. This site is more favorably positioned relative to unavoidable significant impacts than Area D.

The City of Pacific Grove suggests that not enough compelling analysis has been presented in the DEIR to disqualify the 17th and Sunset site from consideration. Please revise the EIR to produce definitive analysis demonstrating how development of a vacant forested parcel is less environmentally consequential than the previously developed parcel at 17th and Sunset.

Thank you for this opportunity to provide comment. Our comments do not oppose the project, rather the inadequacy of analysis and mitigations contained in the Draft EIR. If you have questions, please contact me at 831-648-3189 or mbrodeur@cityofpacificgrove.org.

Sincerely,

Mark Brodeur, Director
Community and Economic Development Department
City of Pacific Grove