# CALIFORNIA COASTAL COMMISSION

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October 23, 2000

Monterey County Board of Supervisors c/o Lou Calcagno, Chair 240 Church Street Salinas, CA 93901

Subject: Pebble Beach Company Proposed Initiative: "Del Monte Forest Plan: Forest Preservation and Development Limitations"

Dear Honorable Supervisors,

Our office would like to take this opportunity to provide initial comments on the "Del Monte Forest Plan: Forest Preservation and Development Limitations" Initiative (the Initiative) proposed by the Pebble Beach Company and placed on the November ballot by your Board. As you know, the Initiative proposes making numerous changes to the Monterey County Local Coastal Program (LCP), including amending the Del Monte Forest Area Land Use Plan (LUP) and the Monterey County Coastal Implementation Plan (IP). If County voters approve the Initiative in November, it will next be submitted by the County as an LCP amendment request to the Coastal Commission. The Commission will then process the submittal in the same manner as any LCP amendment. It is important, therefore, that the changes proposed by the Initiative be understood within the context of both the Coastal Act and the resource protection requirements of the existing LCP. In particular, we note that much of the land in the Del Monte forest that would be affected by the Initiative is constrained by existing natural resources on site, such as environmentally sensitive Monterey pine forest, wetland, riparian and dune habitats, and several rare and endangered sensitive plant species that the LCP protects, regardless of underlying land use designations.

### **Proposed Land Use Changes**

As we understand it, the Initiative would change the Del Monte Forest Area LUP land use and IP zoning district designations<sup>1</sup> for approximately 35 parcels owned by the Pebble Beach Company (PBCo). These parcels cover approximately 592 acres<sup>2</sup>, the majority of which are currently undeveloped and characterized by large tracts of Monterey pine forest, wetlands, and other sensitive habitats. [Please refer to: (1) Attachment 1 for a figure prepared by PBCo that shows both existing and proposed zoning under the Initiative; (2) Attachment 2, a table prepared by CCC staff showing the existing conditions and changes proposed for each land use area; and (3) Attachment 3, staff analysis of the land use changes proposed for each area.]

<sup>&</sup>lt;sup>1</sup> Throughout this letter, land use designations are generally spelled out, followed by zoning district in parentheses; for example Open Space Forest (RC) represents the Open Space Forest land use designation and the Resource Conservation zoning district.

<sup>&</sup>lt;sup>2</sup> All acreages are approximated from those given in the Pebble Beach Lot Program – Project Applications Summary Handout, prepared by Monterey County Planning & Building Dept. for Minor Subdivision/Subdivision Committee January 12, 1999.

Approximately 500 acres of the undeveloped area affected by the Initiative is currently designated Residential [zoned medium-density residential (MDR/B8) or low-density residential (LDR/B8)]. About 80 acres of the affected area are currently designated Open Space Forest (zoned Resource Conservation, or (RC)), and about 12 acres are currently designated General Commercial (zoned Coastal General Commercial or (CGC)). Under the proposed Initiative, approximately 198 acres would be redesignated as Open Space Forest (RC), approximately 288 acres would be redesignated Open Space Recreation (also zoned Open Space Recreation or (OR)), and approximately 9 acres would be redesignated Commercial Visitor Serving (zoned Visitor Serving Commercial or (VSC)). Approximately 12 acres would remain General Commercial (CGC), and approximately 85 acres would remain Residential (94% zoned LDR and 6% zoned MDR).

Generally speaking, the Initiative would rezone large tracts of undeveloped, largely forested land in the Spanish Bay, Spyglass/Cypress, Gowen Cypress, Middlefork, and Pescadero planning areas from Residential (MDR/B8 and LDR/B8) to Resource Conservation (RC). Other areas in the Spanish Bay, Spyglass Cypress and Pebble Beach planning areas would be rezoned from Residential to Open Space Recreational (OR). These area changes would modify zoning designations in order to facilitate a new 18-hole golf course and clubhouse (in the Spyglass/Cypress and Pebble Beach planning areas), and a new driving range and golf teaching center (in the Spanish Bay planning area). The Initiative also proposes to rezone the Sawmill Gulch area, located in the Gowen Cypress planning area, from Resource Conservation (RC) to Open Space Recreation (OR), in order to allow for the relocation of the equestrian center from its current site near Peter Hay Hill.

Proposed changes to Residential (MDR/B8 and LDR/B8) and General Commercial (CGC) designations would allow up to 60 residential units to be developed in Del Monte Forest for employee housing, including up to 12 employee housing units in the Spanish Bay Planning Area B (zoned MDR), and up to 48 employee housing units in the Gowen Cypress Planning Area (zoned CGC). The Initiative would also remove the B8 Resource Constraint overlay from the residentially zoned areas defined in the Initiative.

In addition, the Initiative would remove the existing 161-unit cap on Commercial Visitor Serving development in the Lodge area, and the similar 270-unit cap in the Spanish Bay Resort area. And, the new Commercial Visitor Serving (zoned VSC) designation in the Spyglass Cypress Planning Area would allow for the potential development of up to 24 "golf-suites."

### Coastal Planning Issues Raised by the Initiative

In general, the Del Monte Forest would certainly benefit from a "down-zoning" meant to clearly limit future potential development in currently undeveloped forest areas, particularly given the extent of sensitive coastal resources present there. For example, some areas currently designated for residential development would be more aptly described by the Open Space Forest land use designation and Resource Conservation zoning district, as proposed in certain instances under the Initiative. We recognize as well that any reduction in future residential development would also be expected to correspondingly decrease the amount of traffic, water use, and other public service requirements associated with such development. (Of course, other potential changes

under the Initiative, such as the increase of visitor serving units, also represent their own corresponding increases of such impacts.)

Nonetheless, as we have indicated previously (see most recently our letters dated May 19, 1999 and October 28, 1999; Attachments 4 and 5, respectively), Commission staff remains concerned about the impacts that any future development may have with respect to the existing native Monterey pine forest and other environmentally sensitive habitats located in the Del Monte Forest. For example, both the golf course and driving range are being proposed for areas that contain some of the most important remaining undeveloped Monterey pine forest, wetland and other sensitive habitats in the Del Monte Forest Land Use Area. Other areas slated by the Initiative for development contain similar resource constraints. The current LCP and the Coastal Act provide an array of policies aimed at protecting sensitive resource areas. As such, we are concerned that the proposed Initiative, read as a whole, is not adequately consistent with existing resource protection policies in light of the significant on-the-ground resources found in the affected areas.

In addition, our limited analysis to date has identified other coastal planning issues raised by the Initiative, including: proposed relocation of the equestrian center to Sawmill Gulch in light of previous permit conditions that require conservation easements and reclamation/restoration of the site; the impacts that increased equestrian use may bring to sensitive habitat areas in and adjacent to the Sawmill Gulch site; and the potential impacts from the proposed increase in visitor-serving uses at various sites.

# Overall Development Potential in Del Monte Forest

Overall, the Initiative indicates that it would reduce the total number of potential new residential units from 889 single family dwelling to 38 general residential units, 60 employee residential units and 24 visitor-serving units (See Attachment 2). However, it should be understood that the 889 potential residential units cited by the PBCo do not represent any entitlement. There are not currently 889 vacant residential lots owned by PBCo in Del Monte Forest. The 35 residentially zoned parcels owned by PBCo would first have to be subdivided to obtain this number of new residential sites. The 889-unit number appears to have been derived solely by calculating the acreage of the affected area, and applying the maximum allowed density to derive a total of potentially developable units.

The actual current development potential of the land proposed for rezoning, though, is considerably less. This is because development within any of the areas described in the Initiative would be severely constrained by the sensitive coastal resources present there, including wetlands, dunes, riparian corridors, and Monterey pine forest. As shown on previous resource maps prepared by the PBCo (contained in the Pebble Beach Lot Program – Project Applications Summary Handout), almost all of the areas listed in the Initiative are currently occupied by Monterey pine forest. Most of the areas also include some amount of environmentally sensitive dune, wetland and riparian habitats, as well as Yadon's piperia (*Piperia yadonii*), a federally endangered plant species of which nearly the entire remaining population is limited to the Del Monte forest. Other rare, threatened and endangered plant species found in these areas include Gowen Cypress, Bishop Pine, Hookers manzanita, Hickman's onion, and Monterey Clover. As

required by the currently certified LCP, protection of these existing resources (i.e., avoidance and buffers) would restrict the location and size of any potential building envelope, significantly reducing the actual development potential for the undeveloped land that would be affected by the Initiative.

Inasmuch as the effect of the proposed changes to the Del Monte Forest Land Use Plan is being described in relation to an overall development potential, it would appear to be in everyone's interest to have a better understanding of this actual potential. We note that a more accurate representation of current development potential could be calculated by identifying the number of existing legal lots of record in the forest (which appears to be only 35), mapping out the environmental constraints for the affected properties (including necessary buffers), and then identifying the remaining potential building envelopes.

## Management of Monterey Pine Forest

The LUP policy guidance for forest and soil resources in Del Monte Forest states

The natural beauty of the Del Monte Forest is one of its chief assets. The forest resource, in addition to its role in the areas natural environment, is a principal constituent of the scenic attractiveness of the area, which should be preserved for the benefit of both residents and visitors. The Forest is more than an aggregate of trees. It is home to the area's wildlife and serves to moderate climatic extremes. Therefore, long-term preservation of the Forest resource is a paramount concern.

As noted in Commission staff's previous correspondence on the earlier Pebble Beach Company Lot Program Application, LUP policies regarding preservation of the forest resources require that: the forest be retained "to the maximum feasible degree" (LUP policy 31); projects minimize tree removal (CIP Section 20.147.050(D)(3)) with preference for design concepts which pursue this goal (LUP Policy 34); for all projects proposing tree removal, "preservation of scenic resources shall be a primary objective" (LUP Policy 33); and perhaps most importantly, where LUP objectives conflict, "preference should be given to long-term protection of the forest resource" (LUP Policy 32).

Since certification of the County's LCP in 1984, the status of species that have become rare or especially valuable today have changed from those originally listed in the LCP. Changes associated with the Monterey Pine forest are particularly pertinent to the Del Monte Forest. Within its native range, Monterey Pine is found in just four places in the world—the largest stand being that which mantles the Monterey Peninsula and defines the Del Monte Forest. While native pine forest has generally been threatened in post-European times by habitat conversion, the continued existence of native Monterey Pine forest at all is currently threatened by the pitch canker epidemic. Estimates are that pitch canker disease could result in the death of up to 85% to 90% of the Monterey pine (*Pinus radiata*) trees within the Forest. Because of its limited native range, the threat of ongoing habitat conversion, and now pitch canker, the native Monterey Pine has been listed as a federal Species of Concern and placed on the California Native Plant Society List 1B, making it specifically eligible for recognition under the California Endangered Species Act. [The Native Plant Society has already submitted a petition (in August

1999) to list Monterey Pine as a threatened species, although it was temporarily withdrawn in December 1999 to allow the California Department of Fish and Game time to analyze the volume of information submitted.]

Because of the pitch canker threat, and in light of the special status now associated with the native Monterey pine forest, we recommend that any comprehensive LCP amendment, such as the land use changes proposed by the Initiative, include policies that protect Monterey Pine forest habitat and minimize the risk of native pine forest extinction<sup>3</sup>. Such policies should require designation of the most sensitive forest tracts as ESHA. For those areas not so identified, and not otherwise determined to be ESHA through environmental review, comprehensive tree protection and diseased tree removal protocols should be put in place, including: identification of infected and/or disease resistant/tolerant trees; protection and genetic preservation of disease resistant strains; designation of proper techniques for reducing the spread of the disease (covering removal, handling and disposal of infected materials); and specification of replanting requirements using disease resistant trees.

Along these lines, if the Initiative is submitted as an LCP amendment, the Commission also will have to determine if the proposed Open Space Management Classifications are appropriate, given the existing sensitive resources on each site. As written, the Initiative proposes to manage Open Space Forest under the Open Space Management Classification VI. This classification was originally developed for lands adjoining those planned for development and for permanent forest space that generally consists of even-aged Monterey pine forest. However, it may be more appropriate to manage these areas under Open Space Management Classification II, which was developed for areas such as the SFB Morse Reserve, Crocker Cypress Grove and other areas that consist of "...rare, endangered, or unique plants and their associated communities that have been designated as natural areas of special botanical interest."

We would additionally anticipate that any future amendment to the LCP also will need to provide for the incorporation of potential future technology and/or knowledge that could aid in the long-term protection and preservation of forest resources in the Del Monte Forest (e.g., new cloning, green waste management, and/or pest eradication techniques), as recommended by the Monterey Pine Watch program and experts in this field.

### Land Use Designations and Zoning for Open Space

Because the Initiative proposes to redesignate large areas of forest from residential to open space zoning, it is important to understand the differences between the different proposed open space land use designations. Overall, open space land use areas are critical to maintaining the natural systems of the Del Monte Forest, including sites of endangered species, riparian areas, wetland areas, and sensitive coastal strand areas (dunes and beaches). The LUP has two land use designations involving such areas: Open Space Forest and Open Space Recreational. Open Space Forest land use areas are implemented by the Resource Conservation (RC) zoning districts; Open Space Recreational land use areas are implemented by the Open Space

<sup>&</sup>lt;sup>3</sup> That is, whether or not the Initiative passes, we encourage the Board of Supervisors to consider submitting additional LCP amendments to the Coastal Commission aimed at accomplishing this goal.

Recreational (OR) zoning districts. Regulations for RC and OR zoning districts are outlined in the County's Coastal Implementation Plan (IP) Chapters 20.37 and 20.38, respectively.

The purpose of the Resource Conservation (RC) zoning district is to protect, preserve, enhance, and restore sensitive resource areas in Monterey County. Principal permitted uses in a RC zoning district are (a) resource dependent educational and scientific research facilities uses, and low-intensity day use recreation uses such as trails, picnic areas and boardwalks; and (b) restoration and management programs for fish, wildlife, or other physical resources. Currently, Open Space Forest land uses specified in the Del Monte Forest Land Use area are aimed at protecting such resources as the SFB Morse Botanical Reserve, riparian corridors, rare plants and specimen trees, and geological hazard areas. Potential development allowed in Open Space Forest areas include trails, low-intensity recreational facilities, tree cutting, and public works only if consistent with all other plan policies.

The purpose of Open Space Recreation (OR) zoning district is for the establishment, enhancement and maintenance of the outdoor recreation uses in Monterey County. Principle permitted uses in Open Space Recreation zoning districts include hiking and equestrian trials, picnic areas, minimum accessory facilities, such as restrooms, parking accessory to other principal permitted uses and open air recreation facilities, such as parks, athletic fields and swimming pools. Currently, Open Space Recreational land uses in the Del Monte Forest Land Use Area include the golf courses, beach and tennis club, and equestrian center along with the necessary support and maintenance facilities such as pro shops, cart shops, parking areas, stables and barns. As such, the Open Space Recreational land use designation represents a fairly intensive level of use. Thus, these zoning classifications should be understood as a spectrum from most protective (RC) to less protective (OR).

Roughly estimated, the Initiative would rezone approximately 198 acres from Residential (MDR/B8 and LDR/B8) to Open Space Forest (RC). This would be an appropriate strategy in light of the resources present in these areas (as discussed above), in that it would reduce the potential intensity of use and would provide stronger resource protection policies to these areas. New Open Space Forest (RC) areas would include much of the sensitive Pescadero Canyon area and most of the currently undeveloped lands that abut the Huckleberry Hill Nature Preserve and the Samuel F. B. Morse Botanical Reserve.

The Initiative would also rezone approximately 288 acres of land in the forest to Open Space Recreational. While most of this land would change from Residential (R) to Open Space Recreation (OR), approximately 42 acres would be changed from Open Space Forest (RC) to Open Space Recreation (OR). These zoning changes are intended to facilitate development of a new golf course in the Spyglass/Pebble Beach planning areas and relocation of the equestrian center to the Sawmill Gulch area. The Initiative would also rezone approximately 24 acres from Residential (MDR/B8) to Open Space Recreation (OR), to allow for a new driving range and golf teaching center in the Spanish Bay planning area.

In general, the change from Residential (MDR/B8 or LDR/B8) to Open Space Recreation (OR) is welcome inasmuch as it might better protect on-the-ground resources in the designated areas. Still, we expect that the pursuit of any future development activities in those areas necessarily

will follow the required sensitive resource protection policies contained in the existing LCP. The proposed changes from Open Space Forest (RC) to Open Space Recreation (OR) are questionable in that they could allow for an increased level of recreational use and structural development in areas previously considered suitable only for low-intensity uses and facilities. Such activities could have significant impacts on sensitive habitats in and adjacent to these areas. (See, for example, the discussions that follow.)

# Proposed Golf Course, Equestrian Center, and Spanish Bay Driving Range

Again, the Initiative proposes, among other changes, land use changes from Residential (MDR/B8, LDR/B8) and Open Space Forest (RC) to Open Space Recreational (OR). This change is intended to facilitate the potential development of a new 18-hole golf course, driving range and golf teaching center, and relocation of the existing equestrian center and polo fields. As indicated in the most recent resource maps prepared by the Pebble Beach Company, the areas proposed for development of the new golf course and driving range, as well as the area proposed for the relocation of the equestrian center are all significantly constrained by environmentally sensitive habitat. The area proposed for development of the golf course (Area MNOUV) is almost entirely occupied by Monterey pine forest, and contains rare and endangered plant species, including Hooker's manzanita, Hickman's onion, and large areas of Yadon's piperia. Wetland and dune habitats also exist scattered throughout this area. The Sawmill Gulch area (marked EO on Attachment 1) is similarly constrained by Monterey pine forest and sensitive wetland habitat. The area proposed for the new driving range (Area C) has previously been identified as a high priority for preservation due to the rare Monterey pine forest habitat that is located on middle-aged dunes at the site. ESHA and terrestrial resource policies of the LCP protect all wetlands, marshes, seasonal ponds, remnant coastal dunes, riparian corridors, and other sensitive resources such as the Monterey Pine forest. (With respect to wetlands, the County in cooperation with the Pebble Beach Company is currently conducting new Once these are made available, a thorough review should be conducted to determine what level of recreational use and associated development, if any, may be appropriate in or adjacent to these sensitive wetland habitat areas.)

Additionally, we note that some of the Initiative's proposed changes conflict with provisions of previous coastal permits issued to the Company that required two scenic and conservation easements over the upper and lower Sawmill Gulch quarry sites.<sup>4</sup> As we described in our May

A second Scenic and Conservation Easement was required under the Spanish Bay Coastal Development Permit (CDP 3-84-226), for the protection of natural and scenic resources within the Huckleberry Hill Natural Habitat Area, including the upper Sawmill Gulch quarry site (Area 6). A separate condition of that permit also required

<sup>&</sup>lt;sup>4</sup> As part of the Spanish Bay Resort project permitting (CDP PC-5202), a Conservation and Scenic Easement Deed was granted March 10, 1986 for the Sawmill Borrow Site (lower Sawmill Gulch quarry site) that had been mined for sand during project construction. This Deed restricted any development and uses in the area to project activities, restoration and revegetation, construction, maintenance, repair and use of public services (new road, utility lines/pipes, existing fire roads, pedestrian and equestrian trails) and "...use for open space, recreational and scientific study uses." As we have stated in previous correspondence (see letter dated May 19, 1999), facilities required to accommodate an entire equestrian center would be substantially more intense that the limited development contemplated by this easement.

19, 1999 correspondence, amendments to easements and underlying Coastal Commission permits would be needed to pursue relocation of the proposed full-scale equestrian center to the Sawmill Gulch site. Additionally, any such amendment request would need to demonstrate that it would not substantively weaken the effect of the Commission's previous actions, including provision of similar forest open space benefits elsewhere.

On a related note, the Spanish Bay permit (3-84-226) Special Condition 28 also required a mitigation program that included, among other things, rehabilitation of the Upper Sawmill Gulch quarry site, its incorporation into the Huckleberry Hill Natural Habitat Area, and abandonment and reforestation of the existing Haul Road slopes and roadbed. The Pebble Beach Company is not yet in full compliance with this condition.

### Resource Constraints Overlay

The Initiative proposes to lift development restrictions related to infrastructure constraints by amending the LCP to include language that states that water, sewer and highway capacity are now considered sufficient to serve the level of development proposed by the Initiative. The Commission will need a substantive analysis of these resources, in conjunction with the proposed development potential in the Initiative to determine whether the applicable resource constraints overlay is in fact no longer required.

## Commercial Visitor Serving Land Use

The Initiative would remove the existing potential development limitations for the Lodge and Spanish Bay Areas, which are presently set in the General Development Plan at 161 and 270-inn units, respectively. As the Initiative does not establish any new limits or restrictions, any new development would be subject to zoning regulations for the Visitor Serving Commercial zoning district, including a requirement that it conform to an approved General Development Plan. Any increase in development in these areas may result in direct, indirect and cumulative impacts that can affect land use, water use, public access, traffic circulation, parking, and other public services within Del Monte Forest. A more detailed analysis of these factors is needed to determine whether or not the proposed zoning changes and anticipated future uses can be found to be consistent with the existing LCP and the Coastal Act.

Related to these issues are the Initiative's proposed zoning changes in the Spyglass Quarry Dune area to allow for "golf suites." The Initiative, however, does not make clear what a "golf suite"

<sup>&</sup>quot;...reclamation plans for the upper and lower Sawmill Gulch quarry sites... these locations shall be reclaimed as natural wildlife habitat suitable for addition to the adjacent Huckleberry Hill Natural Habitat Area unless a separate CDP allows an alternative use." The Conservation Easement OTD was recorded October 12, 1987 and added areas within the Sawmill Gulch quarry site to the Huckleberry Hill Open Space area. Development and uses within the easement area are restricted to those that comply with the LCP and are consistent with the primary purpose and intent of preserving and maintaining the natural plant and wildlife habitats found within the Huckleberry Hill Natural Habitat Area. Increased equestrian use in and adjacent to SFB Morse Preserve and Huckleberry Hill Natural Habitat Area could be expected if the equestrian center is relocated nearer to these preserve areas, raising questions of consistency with this 1987 easement.

is, nor how these units would be managed. For proper evaluation, any LCP and/or General Development Plan amendment request would have to detail the size and scale of these units as well as the proposed arrangement for ownership and visitor-serving use.

#### **LCP Amendment Process**

The Initiative proposes a number of changes to the County's current Local Coastal Program for Del Monte Forest. If the initiative passes, the changes proposed by it will not be effective until they are certified by the Coastal Commission as part of the Del Monte Forest LUP and IP. An initiative adopted by the voters has the same legal status as a plan or ordinance adopted by a City Council or County Board of Supervisors. If the initiative amends a certified LCP or affects land use in the coastal zone, the measure must be submitted to the Coastal Commission for review and certification as an LCP amendment.

If the voters pass the Initiative, the County would submit the revisions proposed in the ballot measure to the Coastal Commission for review and certification. The standard of review for an amendment to the Del Monte Forest LUP is conformance with all policies of the California Coastal Act of 1976. The standard of review for the Coastal Implementation Plan (County Zoning Ordinances) is conformance with the policies of the LUP. Regulations for amendments to certified LCPs are generally outlined in Title 14, Article 15 of the California Code of Regulations, although, as discussed in the following paragraphs, the process is somewhat different for LCP amendments proposed through the initiative process.

Unlike LCP amendments proposed by local governments, amendments proposed by the passage of an initiative are submitted directly to the Coastal Commission by the local government after certification of the election results. Thus the usual local public hearings, CEQA review and public notices associated with the preparation of an LCP amendment are not required.

Following submittal of such an amendment, the Commission will set the item for a public hearing and prepare a staff report on the proposal. The Commission hearing will be noticed as required by the regulations and the staff recommendation will be available for public review prior to the hearing. After the close of the public hearing, the Commission may either (1) approve the amendment without modification; (2) approve the amendment with suggested modifications to the proposed amendment; or (3) deny the proposed amendment all together. If the amendment is approved with suggested modifications, the Board of Supervisors may either accept or reject the Commission's proposed revisions in order to complete the process.

In closing, we would like to reiterate the critical importance of analyzing the changes proposed by the Initiative in light of the sensitive resources currently existing within the Del Monte Forest. We are supportive of proposed land use changes that protect the pine forest and other ESHAs present within the areas defined by the Initiative. We remain concerned, however, that a number of the proposed land use changes have the potential to substantially increase the level of intensity of use in areas that contain significant sensitive habitats, specifically with regard to portions of the areas proposed for the new golf course, driving range and relocated equestrian center. Changes to the Del Monte Forest Area plan definitely are in order given the age of the County's

LCP, but any such changes must protect the Monterey pine forest, wetlands, and other sensitive species there if the area is to remain the special coastal resource that it is today.

Thank you for your consideration of these comments. As always, we remain available to answer any questions and to assist with any LCP amendment(s) or related coastal permits that may result from the Initiative.

Sincerely,

Tami Grove
Deputy Director

California Coastal Commission

Cc: Jim Colangelo, Assistant Admin. Officer, Monterey County Planning and Building Dept.

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Dave Potter, District 5 Supervisor, Monterey County Board of Supervisors

Peter Douglas, Executive Director, California Coastal Commission

Allen Williams, Carmel Development Company (Representative for Pebble Beach Co.)

Tony Lombardo, Esq., Lombardo & Gilles (Attorney for Pebble Beach Company)

#### Attachments:

- 1. Map showing Existing and Proposed Land Use Designations (prepared by Pebble Beach Company)
- 2. Existing Conditions and Proposed Land Use Changes (Table prepared by CCC staff)
- 3. Staff Analysis of Proposed Changes to LUP Land Use Designation and CIP Zoning Districts Described in Pebble Beach Company Proposed Initiative (prepared by CCC staff)
- 4. May 19, 1999 Correspondence from Tami Grove to Bill Phillips, Monterey County Planning Director on Pebble Beach Lot Program
- 5. October 28, 1999 Correspondence from Tami Grove to Bill Phillips, Monterey County Planning Director on Pebble Beach Lot Program