

CALIFORNIA COASTAL COMMISSION

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**Attachment 3.**

**STAFF ANALYSIS OF PROPOSED CHANGES TO LUP LAND USE DESIGNATION
AND CIP ZONING DISTRICTS DESCRIBED IN
PEBBLE BEACH COMPANY PROPOSED INITIATIVE: "DEL MONTE FOREST
PLAN: FOREST PRESERVATION AND DEVELOPMENT LIMITATIONS."**

The following information provides the Commission staff's analysis of the zoning and land use designation changes proposed by the "Del Monte Forest Plan: Forest Preservation and Development Limitations" initiative ("the Initiative"). Comments are given for each area described in the initiative, organized within each of the different planning areas outlined in the LUP.

Spanish Bay Planning Area:**Area B*****Proposed under the Initiative***

- The LUP land use designation for a portion of Area B would be changed from Residential (R) to Open Space Forest (RC). The LUP land use designation for the rest of Area B would remain Residential (MDR), and would allow the potential development of up to 12 Employee housing units. Language in the LUP would also be amended to remove the restrictions for additional employee housing units to "dormitory/bunkhouse or temporary (ie, former mobile homes)," thereby allowing permanent rather than temporary affordable housing units to be built consistent with all other plan policies. LUP language would also be amended to accommodate employee, rather than senior citizen, housing.

Staff Comments

- The existing Residential (MDR/B8) zoning in Area B allows a maximum of 63 potential residential development units. However, any potential development in Area B would be constrained by existing ESHA and other sensitive resources¹, including environmentally sensitive riparian habitat areas, Monterey pine forest habitat, and Yadon's piperia. According to the previous resource maps prepared by the Company, Area B is almost entirely covered with Monterey pine forest, and approximately 20% of the area contains environmentally sensitive riparian habitat areas and Yadon's piperia.
- Commission staff conducted a site visit to Area B on October 3, 2000, and observed that the site contains two cleared and graded areas, and a fairly wide, unpaved roadway. These disturbed areas appear to be appropriately zoned for residential development, as designated in the current LCP and as proposed in the Initiative. The area surrounding these two disturbed areas, however, is densely forested and would seem to be more appropriately zoned Open Space Forest (RC). Although the Initiative proposes doing just that for a

¹ References made to mapped ESHA and other mapped sensitive resources in this attachment are based on 1) *Pebble Beach Lot Program Project Applications Summary Handout for the Monterey County Minor Subdivision / Subdivision Committee* (January 12, 1999, for hearing January 14, 1999); 2) CCC staff field visits; and 3) CDP permit history for Del Monte Forest.

portion of the site (see Attachment 1) it is not clear that the proposed residential areas would be located only within the disturbed areas in Area B.

Area C

Proposed under the Initiative

- The LUP land use designation for Area C would be changed from Residential (R) to Open Space Recreational (OR) and would allow for the development of a new driving range, golf teaching center, and parking areas to compliment the existing Spanish Bay golf course.

Staff Comments

- The existing Residential (MDR/B8) zoning in Area C allows a maximum of 56 potential residential development units. However, any potential development in Area C would be constrained by existing ESHA and other sensitive resources, including environmentally sensitive wetlands, and Monterey pine forest habitat. According to the previous resource maps prepared by the Company, Area C is almost entirely covered with Monterey pine forest, and approximately 10% of the area contains environmentally sensitive wetlands.
- Commission staff conducted a site visit to Area C on October 3, 2000, and observed that the site is densely forested with both Monterey pine and oak woodland habitats, and contains a dense, well developed brushy understory. Based on existing site conditions, Commission staff believe that Area C would be more appropriately zoned Open Space Forest (RC) than Open Space Recreational as proposed by the Initiative. Please note Area C has been identified by the California Department of Fish and Game as a high priority area for preservation due to the rare Monterey pine forest habitat located on middle aged dunes according to the *Monterey Pine Forest Conservation Strategy Report* (Jones & Stokes, 1996).

Gowen Cypress Planning Area:

Areas F-1, F-2, F-3

Proposed under the Initiative

- The LUP land use designations for Areas F-1, F-2, and F-3 would remain Residential but the zoning would be changed from MDR/B8 to LDR, and would allow a maximum of 16 potential residential development units, when combined.

Staff Comments

- The existing Residential (MDR/B8) zoning in Areas F-1, F-2, and F-3 allows a maximum of 86 potential residential development units when combined. However, any potential development in these areas would be constrained by existing ESHA and other sensitive resources, including environmentally sensitive Gowen cypress/Bishop pine forest habitat, Monterey pine forest habitat, Yadon's piperia, Hooker's manzanita and Hickman's onion. According to the previous resource maps prepared by the Company, each of these three areas is almost entirely covered with Monterey pine forest habitat. Additionally, nearly 50% of Area F-1 contains Yadon's piperia and 30% contains Hooker's Manzanita. Area F-2 contains about 25% Hooker's manzanita, 10% Yadon's piperia, and some number of Bishop pine and Gowen cypress trees, and Area F-3 contains about 80% Hooker's manzanita, 5%

Yadon's piperia, and 20% environmentally sensitive Bishop pine/Gowen cypress forest habitat.

- Commission staff conducted a site visit to Area F-1 on October 3. Areas F-2 and F-3 have not yet been visited by staff. Additional research is necessary to analyze the proposed changes here. However, previous resource mapping indicate that Areas F-1, F-2 and F-3 are heavily constrained, irregardless of the land use and zoning designations.

Huckleberry Hill Planning Area:

Area G

Proposed under the Initiative

- The LUP land use designation for Area G would be changed from Residential (MDR/B8) to Open Space Forest (RC).

Staff Comments

- The existing Residential (MDR/B8) zoning in Area G allows a maximum of 78 potential residential development units. However, any potential development in Area G would be constrained by existing ESHA and other sensitive resources on site. These include Monterey pine forest habitat, Yadon's piperia, Hookers Manzanita, Monterey clover, and Hickman's onion. According to the previous resource maps prepared by the Company, Area G is almost entirely covered with Monterey pine forest habitat, nearly 60% of Area G contains Hooker's manzanita, approximately 30% contains Yadon's piperia, and approximately 15% contains Monterey clover.
- Commission staff has not yet conducted a site visit to Area G. Given the coverage suggested by the previous mapping and the proximity of Area G to the rest of the Huckleberry Hill Natural Habitat Area, however, Commission staff believe that the appropriate zoning designation for Area G would be Open Space Forest (RC), as proposed by the Initiative, rather than the current Residential (MDR/B8) zoning designation.

Middle Fork Planning Area:

Area H

Proposed under the Initiative

- The LUP land use designation for a portion of Area H would be changed from Residential (MDR/B8) to Open Space Forest (RC). The rest of Area H would remain Open Space Forest (RC).

Staff Comments

- The existing Residential (MDR/B8) zoning district for Area H allows a maximum of 48 potential residential development units. However any potential development in Area H would be constrained by existing ESHA and other sensitive resources on site. These include Monterey pine forest habitat, Yadon's piperia, Hookers Manzanita, and Hickman's onion. According to the previous resource maps prepared by the Company, Area H is

almost entirely covered with Monterey pine forest habitat, approximately 25% of the site contains Yadon's piperia, and approximately 25% contains Hooker's manzanita.

- Commission staff has not yet conducted a site visit to Area H. Given the coverage suggested by the previous mapping and the proximity of Area G to the rest of the Huckleberry Hill Natural Habitat Area, however, Commission staff believe that the appropriate zoning designation for all of Area H would be Open Space Forest (RC), as proposed by the Initiative.

Areas I-1 and I-2

Proposed under the Initiative

- According to Attachment 1 and Attachment 2, the LUP land use designation for Area I-1 would be changed from Residential (LDR/B8) to Open Space Forest (RC). As shown on Attachment 2, however, Area I-1 would also include 11 lots for residential development. This is not indicated on Attachment 1, nor is it shown on Exhibit 1 of the Initiative (Revised Figure 5 Land Use Plan). Exhibit 1 of the Initiative, shows the proposed land use changes in Area I-1 as all Open Space Forest (RC). However, the text of the Initiative states that "Open space and 11 lots for residential dwellings in Area I are the principal proposed land uses in this planning area." The text does not further define how many of the 11 lots would be in Area I-1 or Area I-2.

Staff Comments

- Any residential development in an Open Space Forest (RC) zone would conflict with the limited uses allowed in a (RC) zoning district. Attachment 2 states that 11 residential lots are proposed in Area I-1 and 3 residential units are proposed in Area I-2. Thus there is an apparent conflict between the Initiative text and Exhibit 1, as well as between Attachment 1 and Attachment 2 for the land use and zoning designations proposed for Areas I-1 and I-2.
- The existing Residential (LDR/B8) zoning in Area I-1 allows a maximum of 46 potential residential development units. However, any potential development in Area I-1 would be constrained by existing ESHA and other sensitive resources, including environmentally sensitive riparian corridor habitat, Monterey pine forest habitat, Yadon's piperia, Hooker's manzanita, and Hickman's onion. Area I-1 is almost entirely covered with Monterey pine forest, approximately 40% of the site contains Yadon's piperia, 20% of the site contains Hooker's manzanita, and two environmentally sensitive riparian corridors traverse the area.
- The existing Residential (MDR/B8) zoning in Area I-2 allows a maximum of 37 potential residential development units. However, any potential development in Area I-2 would be constrained by existing ESHA and other sensitive resources, including Monterey pine forest habitat and Yadon's piperia. According to the previous resource maps prepared by the Company, Area I-2 is almost entirely covered with Monterey pine forest, and approximately 10% of the area contains Yadon's piperia.
- Commission staff has not conducted a site visit of Area I-1.
- Commission staff conducted a site visit to Area I-2 on October 3, and observed that the area contains both mature Monterey pine trees as well as numerous pine saplings. Many of the mature pines appeared to be infected by pine pitch canker. Additional research would be

necessary to understand the relation of Areas I-1 and I-2 to future development. However, previous resource mapping suggests that these areas are constrained by environmentally sensitive habitat irregardless of land use and zoning designations.

Spyglass Cypress Planning Area:

Area J

Proposed under the Initiative

- The LUP land use designation for a portion of Area J would be changed from Residential to Open Space Forest. The rest of area J would remain Residential, but would be down-zoned from MDR/B8 to LDR to allow one (1) potential residential development unit.

Staff Comments

- The existing Residential (MDR/B8) zoning in Area J allows a maximum of 22 potential residential development units. However, any potential development in Area J would be constrained by existing ESHA and other sensitive resources, including environmentally sensitive wetlands and riparian habitat areas, Monterey pine forest habitat, and Yadon's piperia. According to the previous resource maps prepared by the Company, Area J is almost entirely covered with Monterey pine forest, approximately 40% of the area is constrained by Yadon's piperia, and approximately 10% of the area contains environmentally sensitive wetlands and riparian corridor habitat.
- Commission staff conducted a site visit of Area J on October 3, and observed a small remnant of native pine forest, with numerous mature Monterey pine trees. Area J is generally surrounded by residential development. Commission staff agree that the majority of Area J should be zoned Open Space Forest (RC) as proposed by the Initiative as it contains riparian habitat located adjacent to Seal Rock Creek. Commission staff also agree that it is possible that one residential unit could be developed in this area, as proposed by the Initiative. However, any residential development here would need to be found consistent with all other plan policies.

Area K

Proposed under the Initiative

- The LUP land use designation for a portion of Area K would be changed from Residential to Open Space Recreational. The rest of Area K would remain Residential, but would be down-zoned from MDR/B8 to LDR. No additional residential development would be allowed in this area.

Staff Comments

- The existing Residential (MDR/B8) zoning in Area K allows a maximum of 22 potential residential development units. However, any potential development in Area K would be constrained by existing ESHA and other sensitive resources, including environmentally sensitive wetland areas, Monterey pine forest habitat, and Yadon's piperia. According to the previous resource maps prepared by the Company, Area K is almost entirely covered with Monterey pine forest, approximately 60% of the area contains Yadon's piperia, and

approximately 10% of the area contains environmentally sensitive wetlands and riparian habitat.

- Commission staff conducted a site visit to Area K on October 3, and observed that the area east of Stevenson Drive contains both mature Monterey pine trees as well as numerous pine saplings. Many of the mature pines appeared to be infected by pine pitch canker. This eastern area lies between the existing Spyglass Hill Golf Course and Stevenson Drive. The portion of Area K west of Stevenson Drive, proposed by the Initiative to be zoned Open Space Recreation (OR) (for the potential development of a clubhouse) appeared to be densely forested, with slopes steeply sloping away from Stevenson Drive. According to the previous resource maps prepared by the Company, this portion of Area K also contains environmentally sensitive freshwater wetlands and riparian habitat. Based on our current understanding, Commission staff believe that this western portion of Area K would be more appropriately zoned Open Space Forest (RC) rather than Open Space Recreational (OR) as proposed by the Initiative. Additional research is necessary to understand the relationship of the forested strip adjacent to the existing golf course (portion of Area K east of Stevenson Drive) to surrounding habitat areas.

Area L

Proposed under the Initiative

- The LUP land use designation for Area L would be changed from Residential (MDR/B8) to Open Space Forest (RC).

Staff Comments

- The existing Residential (MDR/B8) zoning in Area L allows a maximum of 46 potential residential development units. However, any potential development in Area L would be constrained by existing ESHA and other sensitive resources, including environmentally sensitive dune, wetland, and riparian corridor habitat areas, Monterey pine forest habitat, and Yadon's piperia. According to the previous resource maps prepared by the Company, Area L is almost entirely covered with Monterey pine forest, approximately 5% of the area contains Yadon's piperia, and approximately 5% of the area contains environmentally sensitive dune, wetland and riparian corridor habitat.
- Commission staff conducted a site visit to Area L on October 3, and observed that the area contains riparian habitat adjacent to Seal Rock Creek. Commission staff agree that Area L would be more appropriately zoned Open Space Forest (RC), as proposed by the Initiative rather than Residential as currently zoned.

Area M/N

Proposed under the Initiative

- The LUP land use designation for a portion of Area M/N would be changed from Residential (MDR/B8) to Commercial Visitor Serving (VSC), and would allow for the potential development of up to 24 "golf suites." The Initiative does not further describe the size, layout or planned use of these units. Language in the LUP would be changed to add the future golf suites as a new visitor serving commercial area to those areas currently listed in the LUP.

Staff Comments

- The existing Residential (MDR/B8) zoning in this portion of Area M/N allows a maximum of 24 potential residential development units. However, any potential development in this area would be constrained by existing ESHA and other sensitive resources on site, which include environmentally sensitive dune habitat areas and Monterey pine forest habitat. According to the previous resource maps prepared by the Company, Area M/N is almost entirely covered with Monterey pine forest, approximately 50% of the area contains Yadon's piperia, and approximately 10% of the area contains environmentally sensitive dune habitat.
- Commission staff conducted a site visit to Area M/N on October 3, and observed that the area contains the old Spyglass quarry site, which has been used for some time as a dumping and fill site for the Pebble Beach Company. This site originally included a coastal dune complex that was quarried during the development of the Spyglass Golf Course. The area surrounding the fill includes both intact dunes, stabilized by Monterey pine, as well as degraded dunes (due to previous quarrying activities) that are regenerating. Remnants of the original dune complex could be observed along the edge of Stevenson Drive, indicating that the dune complex originally extended at least this far inland. The history of the quarry and fill in relation to the Coastal Act at this location need to be better understood. It is not clear when quarrying stopped, when fill began, and what Coastal Act requirements applied (and apply) here. Further research along these lines is necessary before a determination on the appropriateness of the zoning changes proposed by the Initiative for this area can be made.

Spyglass / Pebble Beach Planning Area:

Area MNOUV

Proposed under the Initiative

- The LUP land use designation for Area MNOUV would be changed from Residential (MDR/B8, LDR/B8), and Open Space Forest (RC) to Open Space Recreational (OR). Existing recreational facilities adjacent to Area MNOUV include the Pebble Beach Equestrian Center and Collins Field, both of which are currently zoned Open Space Recreational (OR). This land use change would allow the potential development of a new 18-hole golf course, which would require the relocation of the existing equestrian center and Polo Fields located near Peter Hay Hill to the Sawmill Gulch area (see below).

Staff Comments

- The existing Residential (MDR/B8 and LDR/B8) zoning in Areas MNOUV could possibly allow a maximum of 207 potential residential development units when combined. However, any potential development in these areas would be heavily constrained by existing ESHA and other sensitive resources on site, which include environmentally sensitive dune and wetland habitat areas and Monterey pine forest habitat. These areas also contain several rare and endangered plant species, including Yadon's piperia, Hooker's manzanita, Tidestrom's lupine, Monterey spineflower, Layia carnosa, Pacific Grove clover and Hickman's onion. According to the previous resource maps prepared by the Company, Area MNOUV is almost entirely covered with Monterey pine forest habitat, 40% of the area

contains Yadon's piperia and approximately 10-15% of the area contains environmentally sensitive wetlands.

- Commission staff conducted a brief site visit to Area MNOUV on October 3, and observed that the undeveloped areas here are densely forested with Monterey pine with a well developed understory. Recent wetland habitat mapping of the area also shows numerous wetland habitats in the area. Commission staff will have to conduct further field investigations of these areas before a determination can be reached as to the extent of wetlands. This area appears highly constrained by Monterey pine and other ESHA. Based on our current understanding, a traditional 18-hole golf course appears to be overly ambitious in light of these constraints. In any case, while golf course development is already an allowed use within areas zoned Residential in the Del Monte Forest, any development in these areas must be consistent with the resource protection policies of the LCP.

Area O

Proposed under the Initiative

- The LUP land use designation for a portion of Area O would be changed from Open Space Forest (RC) to Open Space Recreational (OR).

Staff Comments

- This land use change would increase the type and intensity of recreational use from that currently allowed. According to the previous resource maps prepared by the Company, Area O is almost entirely covered by Monterey pine forest habitat, Yadon's piperia, and Hooker's manzanita.
- Commission staff are concerned that because Area O is nearly 100% sensitive habitat, changing zoning from Open Space Forest (RC) to Open Space Recreational (OR), as proposed by the Initiative, is not appropriate in that it would weaken the resource protections currently provided for the sensitive coastal resources in this area.

Pescadero Planning Area

Area PQR

Proposed under the Initiative

- The LUP land use designations for a portion of Area P would be changed from Residential to Open Space Forest (RC). A portion of area P would remain Residential (LDR) to allow a maximum of 7 potential residential development units.
- The LUP land use designations for Areas Q and R would be changed from Residential (LDR/B8) to Open Space Forest (RC).

Staff Comments

- The existing Residential (LDR/B8) zoning in Areas PQR allows a maximum of 154 potential residential development units, when combined. However, any potential development in these areas would be constrained by existing ESHA and other sensitive resources, including

environmentally sensitive riparian habitat areas, Monterey pine forest habitat, and other rare and endangered plant species. According to the previous resource maps prepared by the Company, Area PQR is almost entirely covered with Monterey pine forest, and 25% of the area is constrained by wetlands, riparian corridor habitat, Yadon's piperia, Hooker's manzanita, Hickman's onion and Sandmat manzanita. The portion of Area P that would remain Residential (LDR) is almost entirely constrained by Monterey pine forest habitat, Yadon's piperia and Hooker's manzanita.

- Commission staff conducted a site visit of Areas PQR on October 3, and observed that much of this area is steeply sloped and densely forested with both mature Monterey pine and young Monterey pine saplings. Rezoning the majority of these areas from Residential (LDR/B8) to Open Space Forest (RC) is appropriate, as these areas lie adjacent to lands of the Pescadero Canyon Open Space, which is one of the largest remaining tracts of Monterey pine forest habitat in the Del Monte Forest. Any residential development within this area must be consistent with the resource protection policies of the LCP.

Huckleberry Hill – Corporation Yard

Proposed under the Initiative

- The General Commercial LUP zoning designation for the Corporation Yard would remain unchanged and would allow development of up to 48 employee residential units.

Staff Comments

- This land use would seem appropriate, as this site is located in a barren or disturbed area that is not apparently constrained by on-site ESHA or sensitive plant species. The Corporation Yard area is located adjacent to Monterey pine forest habitat, however, so any potential development will still have to comply with resource protection policies of the LCP.
- Commission staff has not yet conducted a site visit to the Corporation Yard Area. Given the amount of disturbed land and developed facilities currently on site (i.e., existing Pebble Beach Offices and Corporation Yard facilities), additional employee housing in this area, as proposed by the Initiative, appears to be an appropriate use of the site. It should be noted, however, that under the current zoning ordinance, the General Commercial (CGC/B8) zoning district allows for residential development only as long as the gross square footage for residential use does not exceed the gross square footage of commercial use.

Gowen Cypress Planning Area - Equestrian Center

Proposed under the Initiative

- The LUP land use designation for the area designated EQ (Equestrian Center) would be changed from Open Space Forest (RC) to Open Space Recreational (OR). This change in zoning would increase the amount and type of recreational uses from those currently allowed in Open Space Forest.

Staff Comments

- This area, known locally as Sawmill Gulch, was mined in the past to provide sand for the Spanish Bay Development, and as part of previous permit conditions is subject to scenic and conservation easements that require restoration, revegetation and reclamation for

wildlife habitat. A portion of this area (approximately 17 acres) is a part of the Huckleberry Hill Natural Habitat Area. The level of use and facilities required to accommodate an entire equestrian center in the Sawmill Gulch site would be substantially more intense than the limited development contemplated by the current Open Space Forest (RC) zoning, the Spanish Bay CDP, and the applicable easements. Any potential development in the Sawmill Gulch area, regardless of the Initiative, would either have to be found consistent with the land use restrictions provided for in the easements, or would require amending the Spanish Bay Permit and the associated easements. Any such amendment would have to demonstrate that it would not weaken resource protection efforts of the Commission's previous actions. (See also Attachment 3 for previous correspondence on this topic.)

- Commission staff conducted a site visit of the Sawmill Gulch area on October 3, and observed that restoration efforts in both the Upper and Lower Borrow Site areas have so far produced large areas occupied by wetland, Monterey pine and Gowen cypress forest habitats. While the restoration of these areas is not yet completely successful, it is clear that this area is becoming a part of the surrounding Huckleberry Hill Natural Habitat Area in resource value. What is more, it is clear that with some minor efforts, slope erosion in the upper quarry could be reduced to improve soil development and accumulation that would greatly improve growing conditions in these areas. The intensive recreational use that would occur if the equestrian center were to be relocated to the Sawmill Gulch area and the amount of structural facilities that would be necessary to support such activities would have significant impacts on the largely undisturbed habitats that currently exist in that area. Based on our site visit and observations of existing conditions, Commission staff believe that the Sawmill Gulch area should continue to be zoned Open Space Forest (RC), rather than be changed to Open Space Recreational (OR) as proposed by the Initiative.

Additional changes to the LUP include the following:

- **Initiative:** Table A, Summary of Planned Development, would be deleted without a replacement, and would thereby delete the numbers established as maximums for new development (residential and visitor accommodations) in Del Monte Forest.
Staff comments: Without limitations on maximum development allowed in each area, future development will be regulated based on the ordinances for each zoning district (e.g., height restrictions, setback restrictions and parking requirements), and the resource protection policies of the LUP.
- **Initiative:** LUP Figure 5 would be replaced with a revised Figure 5 showing all proposed Land Use designation changes. Figures 6A, 7A, 8A, 9A, 10A, 11A, 12A, and 13A (maps showing land use designations within each Planning Area) would be removed without replacement. **Staff Comments:** Such a modification is only supportable to the extent that (1) the revised Figure 5 reflects on the ground resources as discussed in this attachment and the letter it accompanies; and (2) Figure 5 is replaced with a revised figure such that the sub-maps (i.e., 6A, 7A, 8A, etc) are no longer necessary for planning purposes. Because it is difficult for a single 11x17" map to provide adequate detail for such a large land use area, we believe that the sub-maps for each planning area are still necessary and should continue to be included in the LUP. Obviously, any sub-maps should also be revised to reflect those land use changes shown on the revised Figure 5.

- **Initiative:** The Initiative would remove the existing 161-unit limitation on potential development for visitor serving use in the Lodge area and 270-unit limit on potential development for visitor serving use in the Spanish Bay area. **Staff Comments:** The Initiative does not propose any new limits or restrictions for further development or expansion of existing visitor serving facilities in the Del Monte Forest, therefore any new development would be subject to zoning regulations for the Visitor Serving Commercial zoning district. 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.
- **Initiative:** The "New Land Uses" subsection of the Spanish Bay planning area would be updated to describe existing development in the area, including the Spanish Bay hotel complex and the Spanish Bay Golf Course. The Spanish Bay hotel complex currently includes retail, restaurants, tennis courts, swimming pools, and 80 residential units. New language would be added to indicate that a driving range, golf teaching center, and parking area are expected to be constructed in Area C to compliment the existing Spanish Bay Golf Course. **Staff Comments:** LCP changes that update the fact that the Spanish Bay Resort is now built are supportable. However, changes to language that allow for conversion of native pine on middle aged dune at Area C (as proposed by the Initiative) do not appear consistent with protecting the valuable coastal resources at this location.
- **Initiative:** New language would be added to the "New Land Uses" subsection for each planning area to reflect the new proposed land use designations shown in Attachment 2. **Staff Comments:** As discussed above, some of those changes do not appear consistent with protecting valuable coastal resources located within particular areas of the Del Monte Forest.
- **Initiative:** The initiative would remove the Resource Constraints overlay (for water, sewer, highway capacity and traffic circulation), which presently exists over Areas B, C, F, G, H, I, J, K, L, M, N, O U, V, P, Q, and R. **Staff Comments:** The Commission will require 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.
- **Initiative:** The initiative would amend the CIP to allow up to 24 "golf suites", to be located in Areas M and N, as a Visitor-Service Commercial use. **Staff Comments:** As the initiative does not make clear what a "golf suite" is, and how these units would be managed, any LCP and General Development Plan amendment would have to describe the size and scale of these units as well as the proposed arrangement for ownership and visitor-serving use.