

December 11, 2019

Rob Mullane, AICP, Contract Project Planner
City of Pacific Grove
Community Development Department
Pacific Grove, CA 93950

Via Email: rmullane@cityofpacificgrove.org

RE: Notice of Preparation (NOP) of an Environmental Impact Report (EIR) and Public Scoping Meeting for the American Tin Cannery Hotel and Commercial Project, 125 Ocean View Blvd.

Dear Mr. Mullane:

Thank you for the opportunity to provide you and Kimberly-Horn, the EIR consultants responsible for preparation of the EIR and its associated studies with information that may assist you to identify key issues and potential significant adverse impacts to the environment, as well as, project alternatives to avoid or mitigate those impacts. Although you determined that the project requires a full EIR and you did not provide a CEQA Initial Study Checklist at the public meeting on December 3rd. The checklist is a template for a complete study that may help to void missing items that are required for a comprehensive environmental review. Therefore, I believe the CEQA Environmental Checklist Form (Appendix "G") provides a good outline for me to use for submitting comments regarding this complex project which follows.

Your power point presentation at the NOP scoping meeting provided an overview that appeared to mistakenly imply that only *"a substantial, or potentially substantial adverse change in the physical conditions **within the project area**"* could result in a *"significant effect on the environment."* The term *"within the project area"* implies the area within the project site boundaries. Power Point image:

"Purpose of CEQA"

- "Significant Effect on the Environment"
A substantial, or potentially substantial adverse change in the physical conditions within the project area

CEQA defines "environment" to mean *"the physical conditions which exist within the area which will be affected by a proposed project."* (PRC 21060.5) That definition indicates a larger **area** including land, air, water, minerals, flora, fauna, noise, or objects of historic or

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aesthetic significance that may also be subject to *a substantial, or potentially substantial adverse change* that the EIR must consider, such the surrounding vicinity and traffic circulation. For example, members of the public attending the scoping meeting expressed concerns about the potential external and cumulative significant adverse effects to the adjacent existing low-small scale character of the commercial and residential neighborhoods, traffic congestion, blocking scenic views from public vantage points and loud construction noise at nearby biological marine resources including the Harbor Seal Habitat.

I believe the studies for this EIR and the Report itself should incorporate a CEQA checklist format to provide a thorough and comprehensive understanding of all of the issues, associated negative impacts, all reasonable alternatives and related necessary findings. The evaluation of potential environmental effects should conform with the standards provided in CEQA Guidelines, Appendix "G" (See: http://resources.ca.gov/ceqa/guidelines/Appendix_G.html). Regarding the subject site; the boundary lines and color designations plans are inconsistent. If the property fronting on Central is part of the project, then it must be included in the study and the property owner must authorize the proposed development. Sloat Avenue is a public right of way (PROW). When and how was this street dedicated as a PROW? What have been the historical uses e.g., pedestrian and vehicle, and what is the current frequency of those uses? How is the value (basis) determined for the proposed lease? Does the law require the PROW to be vacated and re-dedicated before it can be subject to a new use, and how does that process fit into the CEQA review and the proposed development permit?

This project may have significant adverse impacts on nearby marine resources (Harbor Seal Habitat, Marine shorebird nesting and roosting habitat, Monterey Bay Marine Sanctuary, etc.); have the appropriate State and Federal agencies been directly requested to comment? Has the State Water Quality Board been specifically requested to advise about potential significant adverse impacts urban runoff into the City's storm drain system and designated ASBS? How does the project address runoff? Capacity of the offsite existing sewer utilities may need to be substantially increased; how does the proposed project address potential significant impacts to those facilities due to forecast projections for sea level rise.

The following is an outline of the on-site and off-site, potential environmental impacts that may result in direct, indirect, or cumulative significant negative or adverse effects on the environment in addition to those mentioned above: that I believe merit evaluation:

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- 1) Aesthetics:
 - a) The magnitude of the proposed project appears to substantially interfere with existing scenic and panoramic views from public pedestrian vantage points, scenic roadways¹ and inland public and quasi-public destination points.
 - b) The scale of the proposed development appears to substantially overwhelm the existing small and low-scale character of the existing surrounding development.
 - c) The project appears to remove a substantial number of mature trees that contribute to the overall scenic and historic quality of the site and adjacent streetscapes.

The proposed project may substantially degrade the aesthetic quality of items 1a, 1b and 1c above and could potentially result in significant adverse impacts to established aesthetics to the site and surrounding areas. The hotel and associated commercial uses could also result in potentially significant adverse impacts on the social-aesthetic fabric of the existing adjacent residential neighborhoods.

- d) As seen from the shoreline recreation trail, nearby natural shoreline areas and offshore sites (sail boats, whale watching boats, etc.) the proposed large areas of glass and glare may have substantial adverse impacts on the scenic quality of the inland and nighttime public views.
- 2) The proposed project may substantially increase the release of carbon and other gases and or chemicals into the atmosphere by its mechanical systems that could have a significant cumulative adverse impact on the air quality, including pollutants, ozone, fumes, odors, smog and acidity, etc. Has the Monterey Air Quality Board evaluated the direct and cumulative net increase in reduced air quality for the site, vicinity and region?
- 3) The project site is located approximately 240 feet from the nearest beach and about 380 feet from the Harbor Seal sandy beach habitat. The Harbor Seals are known to haul out inland of the sandy beach depending on extreme high tides or surf. The excavation and construction noise of the project may have a significant adverse impact on the seals, especially during the winter spring pupping seasons. Address the construction noise that could result in significant adverse impacts to nearby marine life.

¹ California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government specifies Ocean View Blvd. and Pacific Grove coastline as a public scenic roadway and shoreline.

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- 4) Has a bird nesting and roosting study been made of the resident or migratory birds using the adjacent mature street trees? The project may need to avoid such seasons.
- 5) The topography of entire site ranges in elevation above sea level and may vary in the types of soils or other geological characteristics that should be subject to a geotechnical reconnaissance including potential impacts of the existing and futures shoreline processes, seismic systems, and ground water, etc. Historical reports indicate that granite formations on and offsite were encountered on a portion of the site's development for a can manufacturing company, ca. 1926. Ocean View Boulevard, east of the site, was constructed by apparently using dynamite to blast an opening in the granite formations that can be observed on the steep escarpment between Eardley and David Avenues. The design cross section B-B indicates substantial excavation ranging between 10 and 18 feet for the Lobby/Entry and parking structures that may require heavy excavation and earth moving equipment to accomplish the work.
 - a) Will that work require blasting, pile driving or hammering, etc. to excavate the soils?
 - b) How will the staging for the excavation, rough grading, and transport be conducted? That work may result in substantial vibrations and noise that will have significant adverse impacts on the human and natural habitats.
- 6) The project appears to be subject to a long-term lease of private and public lands.
 - a) How long are those leases and do they represent the "lifetime" for the development, for example 75 years?
 - b) How will the project respond to the forecast changes in climate conditions on and offsite, including sea level rise, etc.? ²
 - c) How will the impacts of climate change on adjacent roads, utilities and nearby development, etc. affect the subject project, including cumulative impacts?
 - d) What will be the public costs for the City of Pacific Grove and City of New Monterey to address direct , indirect, and cumulative impacts to potentially protect the subject site from the effects of foreseeable climate change?

² CITY OF PACIFIC GROVE CLIMATE CHANGE VULNERABILITY ASSESSMENT, January 2015, Figure 5 Potential Sea Level Rise and Coastal Erosion Pacific Grove Vulnerability Assessment, Pacific Institute 2014. "Flooding related to sea level rise, or intensified due to sea level rise, could interfere with life and safety response efforts. "

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- e) What are the reasonable alternatives to avoid those impacts? How will the development contribute to the sustainability of public services and natural resources for the lifetime of the project?
 - f) Assuming the design complies or will be modified to comply with the California Building Code and Fire Codes; if a catastrophic fire³ or unhealthy air from fire smoke, other catastrophic event in were to occur in Pacific Grove that required the mass emergency evacuation of the City's occupants, the proposed project may substantially exacerbate traffic congestion on the adjacent and nearby access roads of egress leading from the City that could result in a significant unmitigated impacts to emergency services and the safety and health of the human occupants.
 - g) Could the proposed project prejudice the implementation of Climate Change Policies in the City's and County Emergency Preparedness or Local Coastal Plans.?
- 7) The State of California and City of Pacific Grove have adopted policies to promote and implement actions that will increase housing, including affordable housing. The proposed project does not propose residential uses; however, it is a relatively large site immediately adjacent to existing residential uses and zoning districts, and it (the subject site) could accommodate housing in the future.
- a) Will the project have negative impacts that could significantly degrade the existing housing located immediately west of the subject site?
 - b) Will the proposed hotel and commercial uses adjacent to the existing residential uses induce a change in the land use of those areas that could displace residents and require new replacement housing in other parts of the community?
 - c) Could the project incorporate low -scale housing including affordable housing on the west side of the site?
- 8) The capacity of the existing transportation system, including vehicles and pedestrians, parking, and public transportation is already overloaded and congested during periods of heavy traffic and holidays. Ocean View Boulevard is part of a scenic coastal roadway and this site is located at a "gateway" to the Pacific Grove coastline which is a significant public destination and resource. Central and Lighthouse Avenues also serve as

³ Monterey County Community Wildlife Protection Plan, March 1, 2016, and CITY OF PACIFIC GROVE CLIMATE CHANGE VULNERABILITY ASSESSMENT, January 2015 (Section 1.4.5) and Del Monte Forest and adjacent woodlands.

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entryways. Between New Monterey and Pacific Grove. Holman Highway 68 is major road to and from Pacific Grove on its southern border. They are all two-lane roads that are overloaded and as mentioned above may not be able to accommodate emergency access in either direction.

- a) What is the current carrying capacity of these major roads and minor roads such as Sloat, Dewey and Eardley including during average and peak hours of travel?
 - b) What will be the carrying capacity during average and peak periods of traffic after the project is completed including the cumulative future build out of the proposed land uses within a mile radius of the site perimeter?
 - c) Could the proposed hotel provide a free or low-cost shuttle service or other free transportation to the historic downtown of Pacific Grove, Light House, or Asilomar State Park to reduce its patron's use of automobiles who may visit those destination points? If so, what would be the anticipated reduction of private vehicles to and from the hotel?
 - d) The City of Pacific Grove prepared parking and traffic studies in the 1990s and early 2000s that recommend strategies for parking and transportation assuming a reasonable rate of growth inducing projects. How does this project address those policies, including alternative modes of transportation such as the "WAVE", vehicle trip reduction, and substantial increases in parking impacts on adjacent residential neighborhoods?
 - e) The project will require a change in traffic flow and patterns on the adjacent streets: Ocean View, Eardley, Sloat, Central and Dewey. How will the traffic lights and stop signs, cross walks, etc. be directly and indirectly impacted, including cumulative impacts? If the project would require physical changes in those public facilities, how will they be funded?
- 9) How does the water capacity requirements of the proposed development compare to the existing uses? Is there a sufficient supply of water for the proposed changes?
- 10) A water shortage in the future due to climate change could have significant adverse impacts on water supply for the residents of Pacific Grove; could this project's demand for water exacerbate that potential problem?
- 11) How will the project impact the existing municipal storm water drainage and sewer systems?

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- 12) Will those systems require physical improvements to accommodate the new project?
- 13) How will the developers fund those improvements, and will those improvements be located to avoid flooding in the future?
- 14) Will physical mechanical systems be located below grade or within the proposed basement areas of the development, or are they proposed to be located on top of the roofs?
- 15) What mechanical facilities including cell phone transmission antennae's, etc. are proposed to be located on the roofs; and, what impacts could they have to public and private views?
- 16) The project site is located in the Coastal Zone where the Local Coastal Program and California Coastal Act seek to provide low-cost or affordable accommodations for visitors to the coastal zone. How would the project comply with those policies?
- 17) The project site includes buildings and structures (American Can Company Factory and Warehouse and Railroad Spur, ca. 1926-7) that are identified as historically or architecturally significant due to their association with the 20th century maritime fishing industry in the Pacific Ocean including the Monterey Bay. The site is also associated with the late 19th century and early 20th century Chinese Fishing Village including a Chinese Temple and Altar that was located on the site, as well as, the extant historic Boat Works Factory at the same waterfront location located directly north of the subject site.
 - a) The proposed project could result in significant adverse impacts to the historical and architectural resources including direct unmitigated impacts to the Warehouse, and portions of the Factory. The project could also result in the direct, and indirect, and cumulative significant adverse impacts to the larger historical and architectural

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thematic maritime fishing industry district that is part of the "Cannery Row Cultural Resources Survey," prepared for the City of Monterey in 2001. ⁴

- b) The American Can Company buildings and related structures form an important part of the historical scenic quality that is strongly associated with, and directly linked to the context of the historically significant buildings of the Cannery Row complex. The political boundary between cities may cause government grants to be bifurcated but it does not diminish their historical feeling and association with the important periods of history and historical events.
- c) Demolition of the American Can Company Warehouse and portions of the Factory could significantly degrade the overall character and understanding of Cannery Row.

In conclusion, as I outline above, the project has the potential to directly and significantly degrade the physical and social environment of Pacific Grove, and indirectly and cumulatively degrade a larger area including the adjacent areas of the City of Monterey, the natural resources of the Monterey Bay and Pacific Ocean. Specifically, it could result in the direct significant adverse impacts to a historical site and cumulative impacts to a recognized historical district, both, eligible at the statewide and National level of significance. It could also have potential significant impacts on the future water supply, traffic and transportation and emergency access routes during catastrophic events such as forest-urban fires. I believe this opinion is shared by many people who have an interest in these buildings that have stood the test of time.

I request the environmental impact report to study and evaluate these issues and consider all reasonable alternatives, including "no project" to avoid the adverse impacts.

Thank you,

Sincerely,

Tony Ciani, Architect

⁴ This survey identified and described multiple historic contexts relevant to the Cannery Row survey area, which directly abuts New Monterey and the project site in Pacific Grove. (Architectural Resources Group, 2001)

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Via Email: rmullane@cityofpacificgrove.org

RE: Notice of Preparation (NOP) of an Environmental Impact Report (EIR) and Public Scoping Meeting for the American Tin Cannery Hotel and Commercial Project, 125 Ocean View Blvd. – SUPPLEMENTAL COMMENTS

Dear Mr. Mullane:

I am writing to submit supplemental information and comments regarding the proposed development:

1) Project Magnitude:

The best method for staff, decision-makers and the (lay) members of the public to comprehend and assess the proposed change to the neighborhood scale and mass, etc. is through the onsite installation of full-size “story poles.” Story poles and netting that outline the proposed structures location and size are successfully and safely installed commercially by bonded engineering companies for a fixed fee, including in commercial zones that allow existing businesses to remain open for business.¹

The project proposes to replace the existing 165,000 square feet of “factory outlet” and related uses with a new hotel and commercial uses totaling 343,932

¹ WWW.CALIFORNIASTORYPOLECONTRACTOR.COM

Story Pole Installation	Story Pole Maintenance
HOA Review	City Planning Dept. Review
Story Pole Design Review	Story Pole Plans
Story Pole Adjustments	Story Pole Removal
View/Scenic Corridors	Story Pole Surveys
Story Pole Cert. By CA Licensed Homeowner's Association Board of Land Surveyor (By Request)	Architectural Review Board (ARB)

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gross sq. ft. including enclosed parking. The applicant's program summary indicates that 252, 457 sq. ft. would be the primary hotel and ancillary uses plus another 18,089 sq. ft. of covered exterior space for a grand total of 271,266 sq. ft. that could be directly compared to the above grade mass of the existing and the proposed new development. (The summary does not appear to provide a volumetric analysis to accurately compare the existing to the proposed new development.) Regardless of current City guidelines for the use of story poles, the project to be subject to a certified story pole installation paid for by the applicant.

2) Transportation and Parking:

The EIR should compare the occupant loads that distinguishes the number of employees and customers for the existing development and proposed uses. The transportation and parking analysis should identify the number of employees including the commuting transportation and parking patterns and options. How many more employee parking places will be required, where and what time periods? How much on designated on-site free parking for employees, and where? What other transportation options will be provided to employees?

3) Air Quality:

What will the increase in automotive exhaust be above the existing ambient levels for the site be for the construction phase and during the post construction occupancy time?

4) Historic Resources:

As I mentioned in my December 11, 2019 letter, the existing buildings and structures are historically significant due to their association with the maritime fishing industry during the 20th century. The following is a summary outline supporting the significance of the site, buildings and structures:

- a) 1927: American Can Company (ACC), Aka ATC, was constructed in Pacific Grove between August 1927 to March 1928, subsequent to building its first can factory in San Francisco, ca, 1901. The American Can Company fabricated cans at the Pacific Grove factory from 1927 – 1954 which was the largest company in the city. It is eligible to the National Register Criteria A and C, and the California Register. Is the proposed project consistent with the Secretary of Interior Standards for the treatment of Historic Structures (provide analysis)?

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- b) A historical synopsis from the City of Pacific Grove Historic Context Statement, (2011): *“The American Can Company While no canneries were located in Pacific Grove, the city did have one large facility tied to the Cannery Row operations in Monterey. During the late 1920s, large purse seine boats were introduced into Monterey Bay, which greatly increased the size, capacity and range of the fishing fleet. Offshore floating reduction plants were also developed, and during the 1930s record catches exceeding 200,000 tons were made.⁴⁷² It is during this period that the American Can Company constructed a massive can manufacturing facility adjacent to the Pacific Grove- Monterey city border, located on the block bounded by Dewey, Sloat, Eardley and Ocean View Boulevard. Opened in 1927, the plant soon gained fame for producing the “famous Monterey one-pound oval sardine can” for fish packers at Cannery Row.”*

The American Can Factory was one of the only large industrial operations in Pacific Grove. It included three primary sections: a one-story reinforced concrete shipping office at its western end; a 36’ tall wood frame production area clad with corrugated metal at center; and an eastern section with steel columns supporting a register roof lined with skylights. A 1941 book describing Pacific Grove’s industrial operations said of the plant:

Transported by truck from Monterey’s Municipal Wharf, huge sheets of tin are converted by the \$1 million factory into oval cans used by the sardine canneries at Monterey. Other industries located in Pacific Grove are two boatbuilding yards, the larger established in 1915 and equipped for construction and repair of all types of fishing and pleasure craft. A planing mill and lumber yard and a steam laundry, both built before the enactment of restraining ordinances, comprise the remainder of the city’s industries.”

“John Steinbeck

At the time the description of the American Can Company was published, the famed writer John Steinbeck was then living in Pacific Grove at 425 Eardley Avenue. This location, only a few blocks above the canneries, proved fertile inspiration for the writer, and within a few years he would complete one of his most famous works, Cannery Row, published in 1945. ⁴²

² *Historic Context Statement – Final City of Pacific Grove Historic Context (1927 – 1945) Pacific Grove, California 31 October 2011 Page & Turnbull, Inc. Page 214*

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c) Project Alternatives:

The subject site and buildings provide an opportunity for the adaptive reuse of its historic buildings and structures which have stood the test of time to provide for their continued use as retail and restaurant spaces. The proposed project uses part of one of the structures , but does not attempt to incorporate all of it, or the entire metal factory warehouse. Therefore, the project could result in significant adverse impacts to the historical significance and integrity of the existing historical buildings and structures.

The “Union Iron Works Historic District”³ which was listed on the National Register of Historic Places April 17, 2014 is a property whose historic functions are similar to the American Can Company associated with INDUSTRY including a manufacturing facility, an industrial storage building; and, COMMERCE including a professional office. The buildings and structures in the Union Iron Historic District provide excellent examples for the Adaptive Reuse of an industrial waterfront complex.

Instead of the cost of demolishing the existing sound, historical buildings and exporting them to the county dump as waste, the Environmental Impact Report should consider how to reuse them as part of the project and for housing or other uses. What is the cost comparison for demolition and export costs vs. Adaptive Reuse? If the buildings are eligible for the National Register, how could federal tax credits for their rehabilitation benefit the project? How could the California Historic Building Code benefit the project? Are there other historic preservation incentives that have not been considered and could they be used?

Sincerely,
Tony Ciani, Architect C-12317
Historic Preservation consultant

³ Link to Listing: <https://www.nps.gov/nr/feature/places/pdfs/14000150.pdf>



Rob Mullane <rmullane@cityofpacificgrove.org>

ATC project concerns

Anne Downs <annedowns1@me.com>
To: rmullane@cityofpacificgrove.org

Thu, Dec 12, 2019 at 5:15 PM

While we see the need to develop the property, we are concerned by the increase of 65 rooms over Project Bella. It is too massive to fit into our small historic town.

We also take issue with the proposed swimming pools which not only require water to fill, but substantially increase laundering of towels and showering. We've been told that water credits are a problem??

Traffic is another concern—traffic jams are not green, traffic jams are things that tourists come to our area to avoid. Traffic tie-ups are annoying, and in the case of natural disasters, can be the difference in life and death.

Let's rein this project in.

Thank you,

Doug and Anne Downs



Rob Mullane <rmullane@cityofpacificgrove.org>

Suggest items to include in EIR

Andrew Kubica <andrewkubica@outlook.com>
To: "rmullane@cityofpacificgrove.org" <rmullane@cityofpacificgrove.org>
Cc: Ben Harvey <citymanager@cityofpacificgrove.org>

Fri, Dec 13, 2019 at 11:17 AM

Mr. Mullane,

In the EIR, please consider the following.

- 1) Impact of traffic on Central Avenue
- 2) Impact of traffic on the current nearby businesses on Central Avenue
- 3) The current site plan implies that the parcel of land with the cleaners and parking lot on Central Avenue may or may not be part of the project. Currently the building housing the cleaners has a footprint that comes up to the curb. The parking lot provides an open view to the sky and environment. Please include any impact if there will be any structure or fencing whose footprint would come up to sidewalk where the current parking lot is located and change view or impact Central Avenue.
- 4) If there is any planned or unplanned replacement of the building occupied by the cleaners or parking lot, please include impacts such as parking, any deliveries of vehicles greater in size than any vehicles currently accessing the parking lot. This should include trash vehicles, vehicles over 22 feet, large moving vehicles, and other large delivery that would be entering or exiting to Central Avenue.
- 5) Impact of removing parking lot to local business and restaurants in the immediate vicinity.

Sincerely,

Andrew Kubica



Rob Mullane <rmullane@cityofpacificgrove.org>

ATC Hotel project.

Anne Wheelis <annewheelis@comcast.net>
Reply-To: Anne Wheelis <annewheelis@comcast.net>
To: rmullane@cityofpacificgrove.org

Fri, Dec 13, 2019 at 4:57 PM

Mr. Mullane,

I am commenting regarding the plans for the ATC Hotel.

My major concern is traffic.

The traffic is bad enough during commute hours (starting at 2 pm) at the David Avenue/Central Avenue/Lighthouse stoplights. Traffic leaving Pacific Grove is often backed up past Eardley onto Upper Lighthouse.

There trip up Eardley across Central is a hazard now--it will be much worse with the addition of more than 200 cars leaving the hotel's parking lots. Do not say that they will be able to walk to dine and entertain--yes--but when they are all checking out of the hotel in late morning they will all be at the same few intersections in the same short 3 or 4 hour window of time.

Will there be stop lights at Eardley and Dewey on Central? I note that the plan is to restore two way traffic on Dewey between Central and Sloat. Will that restrict parking to one side of the street on Dewey? Will the parking for locals who might want to visit the Cannery Row venues or access the coastline become even more restricted? What will be the impact on the Central Avenue businesses?

If this hotel is built, how much say will the citizens of Pacific Grove, now restricted to two ways out of town, have to say about the use of the TOT? Will we feel that we have been compensated for the impact on our mobility--on the planning that we do to get to and from our homes and places of business, health care, shopping, worship, entertainment, etc.?

Thank you for your consideration.

Anne Wheelis
citizen of Pacific Grove since 1972
now living at 651 Sinex Avenue
Pacific Grove



Rob Mullane <rmullane@cityofpacificgrove.org>

Proposed PG Hotel.

Bill Gilreath <bginpg@gmail.com>
To: rmullane@cityofpacificgrove.org

Tue, Dec 10, 2019 at 9:11 AM

Mr Mullane

I have viewed the proposal for the new Cannery Hotel in Pacific Grove. While it is impressive looking, I am shocked by it's magnitude. Below are some of my concerns with this Project and it is seriously to large for the area.

My first thought for this 'White Elephant' is the construction. Not only will it be loud and annoying but I am confident it will exceed noise and decibel restrictions. I am guessing it will take at very least a year. It will be very dirty as well as destructive. I can just imagine as the construction trucks are rolling down our streets they will be endangering our already unstable roadways and pipeline infurstructure.

I envision being blocked in our driveways and several flat tires experienced by many. I am positive it will be a nightmare for so many of us.

My next big concern upon completion is area traffic. During weekends, Holidays. Simple local events, summer vacations, we will look like commuter traffic on an LA freeway. Cars will be gridlocked on Dewey, Ocean, Central, Eardly and Sloat Ave. I notice Sloat Ave. as a path thru road will be eliminated. For us Sloat Ave. home owners to leave our driveways the only way to leave is a left turn on Dewey to Ocean. I further see the hotel will exit on Dewey. There will be such gridlock, I am afraid this will cause much road rage and many finder benders. With all this traffic jockeying for escape, Ocean Ave will become a parking lot of tangled traffic. On the other side of this hotel is Central Ave. This roadway is already a traffic nightmare during commute hours and the additional traffic will bog down the system even greater. Remember, when it is out of the bottle you can't put it back.

I know the Coastal Commission is concerned about parking for coastal visitors. At least 30 parking spots will be lost on Sloat Ave & Dewey for this hotel configured as it is.

Economy Concern:

When Hotel Bella was under consideration, I researched hotel occupancy in Pacific Grove, New Monterey and Monterey. Even at our most iconic events such as AT&T Pebble Beach Golf, Concourse D Elagance, etc., hotel occupancy is never 100%. Prices rise but availability is always here. Why do we need such a mammoth hotel in so small an area. This hotel will endanger long time local hotels, motels, B& Bs as well as local service businesses including a dry cleaner and popular restaurant with good food at fair prices located on Central Ave. I do not see Downtown PG enjoying a retail boom from this hotel. Traffic in and out will quickly dissuade visitors. While some of these hotel visitors will spend money in PG, it will not be incremental but rather replacement.

I finally believe there will be a negative environmental impact. It is my guess the property digging will expose us to toxic materials that exist in the grounds which will lead to numerous costly, construction delaying law suites.

Simply put this project is far to Big. It is not just the local neighbors, it is the entire community which will be negatively affected. This includes yourself as a local Pacific Grove resident.

Thank you for receiving my opinion.

Bill Gilreath
[183 Sloat Ave.](#)
[Pacific Grove, CA](#)

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Bill Gilreath
Pacific Grove Marketing
[183 Sloat Ave](#)
[Pacific Grove, CA 93950](#)



Rob Mullane <rmullane@cityofpacificgrove.org>

The American Tin Cannery Hotel and Commercial Project: Comments to the Notice of Preparation Regarding Required Elements for its Environmental Impact Report

Cosmo Bua <philemata@gmail.com>

Fri, Dec 13, 2019 at 1:27 PM

To: rmullane@cityofpacificgrove.org

To: Rob Mullane, AICP, Contract Project Planner, City of Pacific Grove

From: Cosmo Bua

Re: The American Tin Cannery Hotel and Commercial Project, Comments Re: The Notice of Preparation (NOP) for its Environmental Impact Report (EIR)

Date: 12/13/19

Impacts of Concern to an E.I.R. Evaluation of the American Tin Cannery Hotel and Commercial Project

1. **Aesthetic and quality of life issues:** Look at the this project's context. **Evaluate and report** on how this behemoth project, out of scale as it is with it's immediate surroundings, will change the character of the current residential and business neighborhood within which the A.T.C. is currently accommodated. How will the daily experience, of residents in particular, be impacted. **Report on what research exists** concerning how adding a project of this size and type to similar neighborhoods tends to change the quality of life - for example health, convenience, culture, comfort, happiness, civic engagement, and generally the life experience - for nearby residents? **What are the statistics on likely changes** to personal safety for residents? on increased criminology? on traffic accidents? on emergency response times? when thousands of transient residents are added to an area like this every week? **Report:** Can negative impacts which could degrade the existing housing and business stock located near the site be expected, and mitigated? **What research exists** on how adding a project of this size to similar neighborhoods is likely to affect nearby small businesses? **Report on how** Pacific Grove's existing motels and bed and breakfasts are likely to be affected by the addition of this hotel complex.

2. **Review, consider, report and extrapolate public comments regarding the project "Bella"** formerly proposed for this site. Comments by residents and others of concerns with noise, traffic, particulate and other pollution, disturbance of wildlife, etc. - all of which must be expected to increase and be compounded for this project which is about **40% larger**, are still relevant. There will be that much more activity at and comings and goings from this new hotel complex, and so at least that much greater a degree of significant effects can be expected. Previous commenters on the Bella would reasonably be expected to have amplified concerns and objections as regards this project. Their input can be assumed and it should be added to current consideration and assessments. Also, whatever quantifiable evidence they submitted should be increased by extrapolation to apply to this project.

3. The size of a project for this site doesn't necessarily follow from the size of the site. Nor does the desirability of any particular function for a project. It is very rare for a site of this size to come available in this community. The Bella was a conception of a significantly smaller, less impactful business of the same kind which was expected to be profitable. **Report on: What are the community's known concerns and needs which could be considered for this space? Which are priorities, or even legal requirements - like building lower income housing, which could possibly be satisfied here?**
Report on: Would a smaller, mixed use project which includes some lower income housing be more beneficial to the community and cause less and fewer significant impacts?

4. Many residents of the Monterey Peninsula believe there are already too many tourists/visitors for the area's capacity - especially as concerns special events, traffic, water, and general resident quality of life. **A study of already existing Peninsula guest accommodation capacity, utilization, and demand must be made.** Destroying 79 trees for unnecessary and unwanted increased hotel capacity, primarily for private and municipal profit, is not acceptable. In these times when we and our leaders are supposed to be fighting climate change it is reprehensible. These trees are being lost only due to an arbitrary, business-as-usual design requiring approximately 100% of the parcel to be occupied by the improvements planned (Demolition, Construction, and renovation). This is yet another reason the project is too large.

5. In The A.T.C. Hotel and Commercial Project Tree Resource Assessment prepared for Comstock Homes by Frank Ono, he states. "It is not the intent of this report to be a monetary valuation of the trees..." **This is exactly what is now required: a monetary valuation of these trees themselves, as well as of the loss of the monetary value of their contributions to ground water retention, recycling air and water, the release of oxygen, habitat provision, carbon**

dioxide and other pollutants and particulates removal, runoff elimination, aesthetics, etc. over the decades to come.

6. Also, **it must be documented whether or not these trees are sometimes in use by resident or migratory birds or other wildlife.**

7. What is the **baseline environmental setting** being used for analysis to determine project-caused changes and impacts for each resource area, e.g., biological resources, traffic, air quality, noise and light pollution, etc. Baselines must be complete enough to support requested analysis. **All potential sources of resource impacts must be identified in order to accurately evaluate cumulative impacts.** It's customary for environmental conditions in a project's vicinity, the baseline, to be determined as of the date of the N.O.P.

8. Baseline discussion must **identify inconsistencies between the project and applicable city policies, goals, general plans** and regional plans. Examples:

City of Pacific Grove Architectural Review Guidelines (for a start):

Guideline #1: "The mass and height of a new building should blend well with neighboring structures and not overwhelm them with disproportionate size or a design that is out of character."

Guideline #16: "An effort should be made to preserve significant public view corridors."

Guideline #24: "A new structure should appear similar in scale to those seen as traditional in the neighborhood."

Guideline # 32 "A building should have an overall proportional orientation that is similar to other structures in the setting."

Rather than matching or exceeding the scale of the Monterey County Aquarium a block or so away, consider the scale of everything else surrounding this site. *This should include the ocean, with zero stories in height.*

The City of Pacific Grove Municipal Code, Chapter 12: TREES AND THE URBAN FOREST

(a) The purpose of this title is to facilitate the protection, preservation, and restoration of Pacific Grove's urban forest; and enhance the visual and aesthetic uniqueness of Pacific Grove, in accordance with the city of Pacific Grove General Plan.

12.10.040 Applicability, conflicts, and other requirements.

(b) Conflicts. If conflicts occur between this title and PGMC Title 18 (Buildings and Construction) or Title 23 (Zoning), or the Local Coastal Program, the more protective requirements shall prevail. If conflicts occur between this title and other titles of the PGMC, the Urban Forestry Standards, or other city regulations, this title shall prevail.

12.10.020 Findings.

The city council makes the following general findings regarding the relationship between health, safety, and general welfare, and the selection, planting, conservation, protection, and maintenance of Trees in public and private areas as addressed in this chapter. These shall be the same findings as required to be made for a permit application for Protected Tree Removal and replacement.

(a) Trees are a valuable long-term community asset, and tend to increase property values.

(b) Trees protect us from climatic extremes. They recycle air and water, absorb carbon dioxide and release oxygen, provide shade and windbreak protection, and can potentially moderate temperatures for an entire neighborhood or community.

(c) Trees can improve human health by absorbing air pollution and trapping dust. In addition, they buffer noise from traffic and other sources.

(d) Trees diffuse the effects of rain that weather houses, erode topsoil, and cause flooding. They provide enrichment of the soil for more plant growth.

(e) Trees reduce the volume and slow the velocity of storm drainage and dry weather flows. They also are able to filter out many contaminants that would otherwise end up in the ocean.

(f) Trees provide habitat for wildlife.

(g) Trees contribute to the pleasantness and serenity of neighborhoods.

(h) The presence of Trees can do much to reduce the stress of modern living.

(i) Trees may enhance the architectural character of a neighborhood, accent or soften the effect of structures, promote visual formality and aesthetic interest, and screen undesirable views.

9. **Evaluate how construction noise, and afterward everyday ongoing noise and light pollution will affect** nearby residents, businesses, wildlife (seals and others), and all other biological resources. Are there likely be financial costs associated?

10. **What Critically Endangered, Endangered, or Vulnerable species may see effects, considered "significant" or not, from the construction of the hotel complex and later from its ongoing functioning.**

11. **Evaluate the possible effects of the activities of a great many more people**, thousands each week, on nature trails, tide pools, shoreline and other parks, public areas, etc.

12. **Traffic effects must be evaluated cumulatively with those of the new Holman Condos, the Hotel Durell, the project planned for 520/522 Lighthouse Ave**, and whatever else is known to be in planning by Monterey, New Monterey, and Pacific Grove. What used to be called "rush hour" is now usually referred to as "peak traffic hours", because it lasts longer. Any event or mishap is already more than likely to cause stop and go traffic, if not gridlock, on this section of Central Ave. **Report on the current frequency and duration of such traffic events on Central Ave.** Just a block away on Cannery Row the traffic is already an hysterical mess most of the time.

13. **Story poles and netting are requested by the community. They should be recommended in your report.** Even if not legally required, they will benefit the public's awareness of the project and the evaluation of the project's significant effects.

14. **Study and report on how climate change can be expected to affect this area, and to affect this location in particular. Report on the likelihood** that local and/or other governments will find themselves funding upgrades or repairs to roads or utility infrastructures due primarily to the placement and size, and so later possible safety and other requirements, of this hotel complex.

15. **Evaluate alternatives the particular point of which would be the preservation of more of the historic American Tin Cannery** - already included in the City of Pacific Grove Historical Resources Inventory and known to be eligible for other distinctions.

16. **Report on whether "environmental justice" may require or recommend** that this project and/or the City of Pacific Grove take into account and possibly compensate New Monterey for some of the expected effects and costs to result from the construction and functioning of this hotel complex.

**Rob Mullane** <rmullane@cityofpacificgrove.org>

ATC Comment Correction

2 messages

Cosmo Bua <philemata@gmail.com>
To: rmullane@cityofpacificgrove.org

Sat, Dec 14, 2019 at 9:12 PM

To: Rob Mullane, AICP, Contract Project Planner, City of Pacific Grove

From: Cosmo Bua

Re: Please pass this correction along (The American Tin Cannery Hotel and Commercial Project, Comments Re: The Notice of Preparation (NOP) for its Environmental Impact Report (EIR), 12/13)

Date: 12/14/19

Hi Mr. Mullane,

I reread my ATC comment letter today. I was in such a hurry to get it in by the deadline that I didn't notice I'd written *criminology* when I meant *criminality* in the first paragraph. Please pass this correction along if you can.

Thank you,
Cosmo Bua

Rob Mullane <rmullane@cityofpacificgrove.org>
To: Cosmo Bua <philemata@gmail.com>

Mon, Dec 16, 2019 at 8:29 AM

Thank you.

Rob Mullane, AICP, Contract Planner

City of Pacific Grove | Community Development Department

300 Forest Ave, 2nd Floor Pacific Grove, CA 93950

T: 831-648-3119 Main Reception: 831-648-3183

www.cityofpacificgrove.org | **Planning website:** www.cityofpacificgrove.org/planning/

[Quoted text hidden]

**Rob Mullane** <rmullane@cityofpacificgrove.org>

American Tin Cannery Comments

Cypress Hansen <cyp.hansen@gmail.com>

Tue, Dec 10, 2019 at 4:09 PM

To: "rmullane@cityofpacificgrove.org" <rmullane@cityofpacificgrove.org>

Hello,

I am writing to contribute my opinion on the future of the American Tin Cannery. I am a 25 year-old with a background in ocean science, interpretation and journalism. Having worked at one of the businesses in the Cannery, I am actually quite happy to see it go. The building is clearly poorly managed, has several suites that are just filled with people's junk, is full of antiquated shops, and is surely violating some kind of safety code. The idea of turning it into a hotel, however, is surely not in the best interest of the people of Pacific Grove. Sure, it would generate revenue, but in doing so it would contribute to the issue of tourism having degrading impacts on the community. In consistency with the local outcry about short term rentals, it would be fitting of the PG leaders to turn this location into permanent housing for the increasing numbers of residents who find themselves sharing small homes with four to five other working adults just to afford rent. Furthermore, the environmental impacts of a giant hotel and multiple businesses has got to be greater than that of one apartment building. This is important to consider given the building's location relative to the protected coastline and seal beach.

I don't have any numbers to rattle off, but I think you know what the right choice is for the people of Pacific Grove. It is not to invite more out of towners to the area. It is not to deny the local residents of more housing options. Can you imagine the headlines if PG decided to act on behalf of it's locals instead of it's wallet? PG already has a reputation for insisting on keeping things local, so as "America's last home-town" the city ought to strike down plans for turning the Tin Cannery into another hotel. We have plenty of those around the Peninsula. What we don't have enough of is housing, which is important to keeping the local economy in tact.

Thank you,

-Cypress



Rob Mullane <rmullane@cityofpacificgrove.org>

Pacific Grove hotel project comments

Daniel Fisher <fisher.danielc@gmail.com>

Fri, Dec 13, 2019 at 1:33 PM

To: "rmullane@cityofpacificgrove.org" <rmullane@cityofpacificgrove.org>

Cc: Daniel Fisher <fisher.danielc@gmail.com>, "manuelapacheco@att.net" <manuelapacheco@att.net>

Beautiful nature, serenity and quiet community are reasons for visiting Pacific Grove. Individuals putting forth this proposal are looking to simply line their pockets regardless of the impact it will have on our quiet community.

Sensitivity to the neighbors with the natural beauty of this area, which is not overly commercialized, an area that is a statement to naturalism cannot be overstated and must be protected vigilantly. Any and all decisions to proceed should be based on the varying types of evidence that are available to all interested parties. Without such evidence, no one should move ahead based on the need for money or some absolute belief that this project is a necessity. Between the proposed blasting, airborne pollution, and sediment that will make its way into Monterey Bay it is a wonder that this proposal is made as far as it has.

Our feelings are strongly emotional based on 3 generations of roots here, theirs are financial with absolutely Zero regard to the neighborhood or neighbors who will be living with continuous noise, additionally congested streets, mental & environmental pollution into Pacific Grove and Monterey Bay. This will be a 24 hour city that effects nature, people and resources which we are constantly being reminded to conserve. Pacific Grove was founded as a retreat -this will clearly not be a retreat where calm and quiet are the expectation. It would be the exact opposite. Is that the result that we need at any time?



Rob Mullane <rmullane@cityofpacificgrove.org>

ATC project EIR scoping

3 messages

Donald Murphy <dmurphy32@icloud.com>
To: rmullane@cityofpacificgrove.org

Fri, Dec 6, 2019 at 12:48 PM

To: Rob Mullane
City of Pacific Grove
Community Development Department
300 Forest Avenue
Pacific Grove, CA 93950

From: Donald Murphy
635 Pine Avenue
Pacific Grove, CA 93950

Dear Mr. Mullane:

Thank you for the opportunity to comment on the scope and content of the environmental impact report to be prepared for the American Tin Cannery Hotel and Commercial Project.

I attended the Dec. 3, 2019, scoping meeting at the Pacific Grove Community Center and endorse the list of "environmental areas where impacts are most likely to occur" presented at that session. I also support the comments offered by city residents who offered suggestions about specific environmental areas.

I suggest that the following areas receive particularly thorough analysis:

Transportation and Circulation

The intersection at David and Central and Lighthouse Avenues is the major intersection closest to the proposed project. That intersection is already busy. Drivers, particularly those going east through the intersection, often face long wait times. What impact will traffic generated by the proposed project have on circulation at that intersection and in the nearby neighborhoods? How could that impact be mitigated if necessary?

My sense is that the state is more concerned with vehicle miles traveled than with traditional traffic measurements, but increased traffic congestion is invariably the first thing residents mention when talking about the project.

Perhaps increased congestion is also an **Air Quality** issue?

Biological Resources & Noise and Vibration

Harbor seals, a species protected under the Marine Mammal Protection Act, use the nearby beach at Hopkins Marine Station to give birth to and raise their pups. After giving birth, female seals usually spend four to six weeks with the pups. During that period, females are skittish and sensitive to noise. Noise often results in females leaving the beach and abandoning the pups, which then die.

My guess is that construction noise would drive the females from the beach. The only mitigation I can think of would be a construction ban on the Ocean View Boulevard side of the project during harbor seal pupping season, roughly April through June.

Experts with NOAA could offer comments on this issue.

Hydrology & Water Quality

Under the normal guidelines of the Monterey Peninsula Water Management District, there is not enough available water to allow this project. But the district board granted a waiver to the guidelines in response to the applicant's argument that the project would be designed with water-saving measures incorporated.

I'm not sure if this is a CEQA issue, but it is not clear where the water for the project will come from. And, although details of the water saving measure have not been released, a large volume of non-potable grey water is apparently going to be generated, stored and re-used on site.

Aesthetics (Visual Resources)

People now have a view of Monterey Bay from the sidewalk near Central and Eardley avenues. I think this view would be considered "a significant public view corridor" under the Land Use Element of the Pacific Grove General Plan. The proposed hotel would eliminate this view corridor.

I am the chair of the Pacific Grove Planning Commission, but I offer all of these comments as a resident of Pacific Grove. I do **not** write for the commission nor as a member of the commission.

Thank you for considering my comments. You can probably tell that I am not a CEQA expert, but I hope that my comments are helpful. Please don't hesitate to contact me by email or phone (831.644.0328) if you require further information.

12/06/2019

Rob Mullane <rmullane@cityofpacificgrove.org>
To: Donald Murphy <dmurphy32@icloud.com>

Fri, Dec 6, 2019 at 3:53 PM

Chair Murphy:

It was very nice to meet you at the scoping meeting, and thank you for your comment letter. I will pass your letter along to the EIR Consultant. We appreciate you taking the time to send along your comments and acknowledge your note that you are expressing these comments as an individual. Thank you again.

Rob Mullane, AICP, Contract Planner

City of Pacific Grove | Community Development Department
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T: 831-648-3119 Main Reception: 831-648-3183
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[Quoted text hidden]

Rob Mullane <rmullane@cityofpacificgrove.org>
To: Alyson Hunter <ahunter@cityofpacificgrove.org>, Anastazia Aziz <aaziz@cityofpacificgrove.org>

Fri, Dec 6, 2019 at 3:55 PM

Alyson, Anastazia, and Tad,

I only received one additional NOP comment letter so far. It is below along with my response, for your information. I'll send a pdf version to Tad.

Rob Mullane, AICP, Contract Planner

City of Pacific Grove | Community Development Department
300 Forest Ave, 2nd Floor Pacific Grove, CA 93950
T: 831-648-3119 Main Reception: 831-648-3183
www.cityofpacificgrove.org | **Planning website:** www.cityofpacificgrove.org/planning/

December 13, 2019

Attn: Rob Mullane, Contract Planner: rmullane@cityofpacificgrove.org

From: Elizabeth and Robert Fisher
429 Lighthouse Avenue, Apt. 2
Pacific Grove, CA 93950

Re: American Tin Cannery (ATC) Hotel and Commercial Project – EIR Scoping

CULTURAL, TRIBAL, AND HISTORIC RESOURCES:

Historic Zone

The EIR in conjunction with the City and P.G. Heritage Society need to present a thorough historical review of the site and the surrounding area to help determine whether the affected area should be designated as an historical zone.

Chinese Fishing Village

The Chinese fishing village that existed at the site has been overlooked. An archaeological survey ought to be conducted to decide how any related resources that may be unearthed should be protected, along with Native American tribal/cultural resources. We understand there is a 5,600 year-old Native American residential site under the Aquarium parking lot kitty-corner from ATC, with a large number of burials. Archaeological and tribal monitors should be provided during any ground disturbance.

BIOLOGICAL RESOURCES:

Loss of Trees

PG has a policy of saving mature trees. It appears that at least 75 mature trees will be removed along Sloat and Eardley—a huge loss, biologically, visually, and in terms of air quality. Mature trees are particularly important in this area since so many surfaces are already used for black-top parking and flat roofs.

Since the site is located so close to Hopkins Marine Station and the Aquarium, a campus-like architecture that incorporates the existing trees and takes advantage of Bay views would blend into the area. This would increase compatibility of this project with the surrounding neighborhood.

Impact on Harbor Seals

The construction impacts the Harbor seals at Hopkins Marine Station, especially the potentially devastating impacts during pupping season on Hopkins west beach. Seals also haul out on Fisher Beach immediately across the street from ATC, and nearby Agassiz Beach, together with their pups.

Noise & Vibration Harmful

The amount of noise and vibration from excavating solid granite for 260 sub-grade parking spaces in addition to all the demolition work will create a substantial adverse impact both on the seals and others in the area. Substantially reducing the size of the project and therefore the parking needs could help reduce these adverse impacts.

This kind of disturbance of protected marine mammals is a major concern. We believe the extent of demolition and construction and the methods of construction, and its duration, need to be reconsidered to avoid losing Pacific Grove's harbor seal population.

TRANSPORTATION AND CIRCULATION:

Construction and the hotel once completed would have substantial adverse impacts on traffic flow and parking on Central, Ocean View, and Eardley at the very least. The increase of cars in the area due to the massive size of this project (225 rooms plus several commercial uses) will clog the area on a daily basis.

The project includes the parking lot on Central between the dry cleaners and the Aquarium's office building, so it would apparently displace the current parking uses once the hotel is in operation and perhaps during construction as well. We believe removal of current on-site parking in addition to removal of parking on Sloat will require people who visit other businesses in the area to park in the neighborhood, thus making it more difficult for residents to find parking on the streets.

Cumulative Impacts

Traffic congestion during both construction and operation of the hotel would add to already overly congested conditions and pose a substantial negative impact to emergency evacuation routes and emergency response. This location is at the entrance to PG on Central Ave. This type of added congestion will affect all those who are entering and leaving PG, as well as the residences on the western block of Sloat. This project would limit ingress/egress to the community following major disaster events.

AESTHETICS & VISUAL RESOURCES:

Story Poles

The planning director said at the recent scoping meeting that PG currently has no story pole policy for commercial structures due to alleged dangers they pose. However, other coastal communities such as Santa Barbara and Del Mar provide for story poles for commercial and municipal as well as residential projects, at heights of 40 ft. Story poles are an important tool to show the public how the mass and bulk of the project will appear. PG can and should require story poles.

Too Massive

This massiveness of this project conflicts with PG's small-scale residential community character. It is too massive for this site, being so close to the water's edge. The number of rooms needs to be significantly scaled back (cut in half), and the whole project limited to the height of the existing ATC. The project is overpowering when viewed from all angles, including Central Ave and the residential neighborhood immediately adjacent to the west, as well as negatively impacting public views (including from Central) to and from the sea. When viewed from Aquarium decks it will also look out of place.

Urban or Residential

The planning department has said in the past that the setting is highly urban. We see it as a beautiful natural and cultural area that is unique to PG, with views to the Bay even from the low elevation of the sidewalk, and large numbers of mature Monterey cypress and other mature trees, and the huge granite formation that Andronico's sits on, along with the historic buildings on the Hopkins Marine Station campus (Monterey Boat Works, Agassiz Hall and others) and the Aquarium's marvelous adaptive re-use of the Hovden Aquarium. We believe the massive scale of the proposed hotel will degrade this setting. The historic structures in these locations could be repurposed sustainably instead.

From: **Inge Lorentzen Daumer** <ilwd50@gmail.com>
Date: Fri, Dec 13, 2019 at 3:39 PM
Subject: NOP for ATC PROJECT...Comments
To: <rmullane@cityofpacificgrove.org>

Rob Mullane, AICP, Contract Project Planner,

What an apt day for a Deadline...Friday the 13th!

Where do I even begin? There really is no way to "mitigate" My neighborhood; my life! The sheer size of the proposed project compromises Pacific Grove. This is the Gateway to our city; one of only 2-ways to get in-and-out of Pacific Grove (Central Ave. and Forest Hill/Hwy 68). The former city Administration already impacted Central Ave. with their "beautification/traffic calming project of medians and re-configuration.

The Cumulative Impacts will be as immense as the proposed project:
PACIFIC GROVE IS NOT CANNERY ROW, nor wants to be "Annexed" by them. Further encroachment of their "sphere-of-influence" coupled with the Aquarium is untenable.

TRAFFIC:

Ingress/egress Central, Eardley, Dewey Avenues and Ocean View Blvd.
Daily flow of valet in-and-out trips
Circulation in a Residential Neighborhood (this is No Urban environment!)
Service Entrance on Sloat Ave. with the narrowness of Dewey Ave. not conducive to 2-way traffic, and eliminating all on-street parking
Closure of one block of Sloat Ave. for the rest of Sloat Ave. Residents. If our street is made 2-way, instead of the one-way (west-to-east) it would turn it into a delivery truck-free-way as well as eliminate parking and increase tourist traffic to unbearable levels. The concept of 225 rooms plus retail/restaurant/public populace plus the workforce to sustain operation has no where else to go! Nor do we residents!
New Monterey? How can they survive? This would be like a Special-Event Scenario Every Day!

NOISE AND ENVIRONMENT:

Sound carries Greatly here by the shoreline. Demolition, heavy equipment (where will they be parked and stored?) jackhammers/backhoes cranes/cement trucks back-up warning "ding-ding-dings", etc.
BLASTING will de-stabilize the granite bedrock we sit upon as well as degrade the shoreline, shake-rattle-and-roll my neighborhood and home and devastate the wildlife.
Deer wander our street, day or night, the seals do their haul-outs and pupping just across the street and flee with any loud noise, birds roost and nest in the trees proposed for removal. (I won't mind if the racoons that crawl out of the storm drains at night go over to ravage the hotel project, rather than my neighborhood!)

Operational Noise...HOTELS NEVER SLEEP! Delivery truck to supply (early AM?), Garbage trucks daily, linens, workers arriving and departing...the list goes on and on.

Air Quality from all the exhaust and debris, loss of mature trees...and what about that blasting?

Light Pollution no matter how lights are angled, just Too Big, Too Much.

VIEW CORRIDORS:

This entire project looms behind Central Ave. businesses and blocks blue-water views for the public. Views from the sea will be an abomination! This area Must have story poles to inform and ensure that the people who actually live here, have a say!

WATER:

This project has been and is, attempting to hijack water rights they do not have!

PEACEFUL PACIFIC GROVE WILL BE NO MORE.

Please look very carefully at the destruction you are trying to create.

Sincerely,

Inge Lorentzen Daumer
180 Sloat Avenue
Pacific Grove CA
831-649-1363

P.S. Even in the revised plans, Avenues and Blvd.'s are named incorrectly.

From: **J COHEN** <janetcohen333@comcast.net>

Date: Fri, Dec 13, 2019 at 10:58 AM

Subject: Is the ATC truly an urban site?

To: <mullane@cityofpacificgrove.org>

Cc: <aaziz@cityofpacificgrove.org>, City Manager <bharvey@cityofpacificgrove.org>, <billpeakepg@gmail.com>

Hello Mr. Mullane,

I appreciate you considering this opinion.

Thank you,
Janet Cohen



Rob Mullane <rmullane@cityofpacificgrove.org>

Response to NOP of an EIR for the American Tin Cannery and Commercial Project

Jane Haines <janehaines80@gmail.com>
To: rmullane@cityofpacificgrove.org

Wed, Dec 11, 2019 at 7:55 PM

Dear Mr. Mullane,

This email responds to the Notice of Preparation of an EIR for the American Tin Cannery and Commercial Project (SCH Number 2019110152) and requests analysis of the potential environmental impacts of the proposed project caused by adding an estimated 300 new, hotel-type jobs within the Pacific Grove city limits. The number of 300 new hotel-type jobs is derived from the 4/6/2016 Fiscal Analysis of the Proposed Hotel Project Bella Project by Applied Development Economics, Inc. (<https://www.cityofpacificgrove.org/sites/default/files/general-documents/community-economic-development/hotel-bella-fiscal-analysis-040616.pdf>) which concludes that the similarly-sized and similarly-configured Bella Hotel Project, in the same location as the currently proposed hotel project, would employ 300 workers (pgs. 1 and 3).

Specifically, I request that the EIR analyze how many new jobs the currently-proposed project will likely add in the City of Pacific Grove and if that number substantially varies from the 300 estimated for the earlier project, please explain in what ways and why. I request the EIR to explain the likely pay ranges for those jobs and how the potentially significant environmental impacts of adding that many new jobs will be mitigated in order to cause less than significant environmental impacts.

Sincerely,
Jane Haines
601 Ocean View Blvd. Apt. 1
Pacific Grove, CA 93950
831 375-5913



Rob Mullane <rmullane@cityofpacificgrove.org>

American Tin Cannery Proposal

Jan Loomis <janetteloomis@hotmail.com>

Fri, Dec 13, 2019 at 9:04 AM

To: Cynthia Garfield <cgarfield@cityofpacificgrove.org>, Bill Peake <bpeake@cityofpacificgrove.org>, "huitt@comcast.net" <huitt@comcast.net>, "rhuit@cityofpacificgrove.org" <rhuit@cityofpacificgrove.org>, "nsmith@cityofpacificgrove.org" <nsmith@cityofpacificgrove.org>, "citymanager@cityofpacificgrove.org" <citymanager@cityofpacificgrove.org>, "cityclerk@cityofpacificgrove.org" <cityclerk@cityofpacificgrove.org>, "atomlinson@cityofpacificgrove.org" <atomlinson@cityofpacificgrove.org>, "jamelio@cityofpacificgrove.org" <jamelio@cityofpacificgrove.org>, Jenny McAdams <jmcamads@cityofpacificgrove.org>, "dave@laredolaw.net" <dave@laredolaw.net>, "heidi@laredolaw.net" <heidi@laredolaw.net>

Cc: "rmullane@cityofpacificgrove.org" <rmullane@cityofpacificgrove.org>, "aaziz@cityofpacificgrove.org" <aaziz@cityofpacificgrove.org>

To Whom It May Concern,

I am writing this letter to voice my concern regarding the proposed development of a 225 room hotel at the current site of the American Tin Cannery.

As a full-time Pacific Grove resident and volunteer Naturalist for the Monterey Bay National Marine Sanctuary I have several concerns.

First, I would ask Council to very carefully examine whether we truly need a very large hotel when affordable housing in an on-going issue. Why not build single family condominiums with a certain percentage zoned as affordable housing? Add ground-floor retail and you solve several problems.

Second, I am very concerned with the proposed removal of established trees. Why not request the architect to work around the existing trees and retain some of the established (protected) trees? By removing these trees you will remove critical habitat for birds and other animals as well as contribute to our climate change crisis. We should be adding to our existing trees, not removing them. Removal and replacement of existing, established trees will take years to get established.

Third, we have an established, federally protected colony of harbor seals that live and pup 200 yards away from the proposed construction site. Digging, blasting and drilling for such a large building project (especially underground parking), will likely force these seals to flee. It is highly likely these seals may relocate to Lovers Point instead, which will present an even greater problem for the City (please refer to the elephant seal issue at Point Reyes as a point of reference). Rather than waiting for approval of the project and monitoring the disturbances during construction, why not consult with the experts before the project gets too far along? A permit will more than likely be required prior to construction due to the close proximity of a sensitive species that falls under the Marine Mammal Protection Act. A smaller scaled project may have less impact and possibly more likely to be approved.

While I am not opposed to development and city improvements, I think we need to be very careful and truly address the needs of the City while taking into account our environment.

Thank you for consideration of my concerns.

Jan Loomis
Volunteer Naturalist Monterey Bay National Marine Sanctuary (NOAA)
City of Pacific Grove Resident



Rob Mullane <rmullane@cityofpacificgrove.org>

Comments for EIR scoping of hotel application for ATC site, Pacific Grove Permit Application AP/UP/TP-D 19-0363

foxx swamp <oceanfoxx@yahoo.com>

Thu, Nov 28, 2019 at 8:57 PM

To: "rmullane@cityofpacificgrove.org" <rmullane@cityofpacificgrove.org>

Cc: "aaziz@cityofpacificgrove.org" <aaziz@cityofpacificgrove.org>

From: Kim Akeman

Nov. 28, 2019

To Whom It May Concern:

I am unable to attend a scheduled EIR scoping session but have concerns about two environmental impacts caused by this proposed project. The proposed 225-room hotel at the American Tin Cannery site in Pacific Grove is located directly across from very sensitive seal habitat. I have been monitoring the harbor seal colony since 2010 and have documented them at this location throughout that time. This project is approximately 200 feet away from one of the beaches and two other haul out locations at Hopkins Marine Station utilized by the harbor seals regularly. These beaches are located in coves surrounded by rocks that provide protection from the strong ocean waves. For that reason, these areas are vital to the survival of the seals as haul out sites and pupping beaches. The harbor seals do not have other locations that provide the safety and space that this area does and thousands of people come every year to see them as well as the now 9500 daily followers on their harbor seal facebook page. I am concerned about the construction noises especially the process to make the underground parking. This area is basically granite and the removal of granite could be very noisy and disruptive to the seals. Blasting, fracking, drilling or any other procedure to make this underground parking structure could drive the seals away and if this kind of disruption happens anytime between the end of November to the end of May, it could cause a pregnant seal to abort a pup or a mom to be scared away, causing a pup to be abandoned and therefore die. Even the sound of nail guns can drive them off the beach. I have witnessed this disturbance and the location of the construction was farther away and much smaller compared to this project. These animals are protected by the federal Marine Mammal Protection Act and this project could have devastating effects on our harbor seal population.

My second concern is for our trees. During a time when we are battling against climate change and struggling in the city to replant our forests and upper canopy, we certainly do not want to remove any trees to build another hotel. I would hope that in a time where the climate should be a top priority for everyone, this project should work around the trees, incorporating them into the plans, not removing them to put in some token ornamental trees in an atrium. The cypress trees are important to our community, the wildlife that use and live in them and to the environment as a whole. They are nothing less than treasured life.

Thank you for your consideration.

--Kim Akeman
228 18th St
Pacific Grove, CA 93950

December 12, 2019

Rob Mullane, AICP, Contract Project Planner
City of Pacific Grove Community Development Department
300 Forest Avenue
Pacific Grove, CA 93950

Via Email: rmullane@cityofpacificgrove.org

Re: ATC EIR NOP and Public Scoping Meeting

Dear Rob Mullane:

I'm writing regarding my concerns about the hotel project planned for the ATC site, and additional locations that make up the entire project site, to request that the EIR analyze the potential adverse impacts described below and feasible alternatives that would avoid these negative impacts.

(Question: Why do some pages (4, 5, 6, 8, and others) in the September plan set not show the project site boundary extending to Central Avenue, while the rest do show that boundary?)

AESTHETICS & VISUAL RESOURCES:

Story poles:

The planning director said at the scoping meeting that Pacific Grove currently has no story pole policy for commercial structures due to alleged dangers they pose. Story poles are widely used for commercial development in California, including coastal communities such as Santa Barbara and Del Mar. Story poles are an important tool to help planners and decisionmakers, as well as the public, experience how the mass and bulk of the project will appear at the site, and how public views may be blocked or degraded. Story poles should be required for a more representative assessment of impacts to visual resources.

The project appears MASSIVE in scale, as seen on the September 2019 plans, as viewed from all angles including Central Avenue and the residential neighborhood immediately adjacent to the west. The plans indicate that the project would negatively impact public views (including from Central) to and from the sea—and the project appears massive in light of PG's small-scale residential and historic community character.

Building on what is currently Sloat Avenue between Dewey and Eardley, instead of bridging over it, adds to the massive appearance, and it is not a justifiable use of a City street.

The planning department has said in the past that the setting is highly urban. I see it as a beautiful natural and cultural area that is unique to Pacific Grove, with views to the Bay even from the low elevation of the sidewalk, and large numbers of mature Monterey cypress and other mature trees, and the huge granite formation that Andronico's sits on, along with the

historic buildings on the Hopkins Marine Station campus (Monterey Boat Works, Agassiz Hall and others) and the Aquarium's marvelous adaptive re-use of the Hovden Cannery. I believe the massive scale of the proposed hotel will degrade this humble setting. All the historic structures could be repurposed sustainably instead, and a much less massive structure or structures could be built on the portion between Central and Sloat.

AIR QUALITY and GREENHOUSE GASES:

What effect would the demolition process for much of the existing buildings (a big chunk of the main concrete building, with the sawtooth skylights, and all of the red corrugated former warehouse and the concrete building to the west of that) have on air quality and levels of particulate matter? And what an enormous waste of resources and energy it would be to demolish all that concrete and haul it to the landfill!!

BIOLOGICAL RESOURCES:

Flora:

Frank Ono's June 3, 2019 tree report states that 79 mature trees will be removed along Sloat Eardley, and Dewey, "due to the required grading, construction and shoring" —a huge loss, biologically, visually, and in terms of air quality. This includes the beautiful, mature Red-Flowering Eucalyptus trees (flower clusters actually come in a variety of shades) as seen from the scenic road as the trees extend up Eardley from Ocean View, in addition to all the Monterey Cypresses and oaks on the site. The assessed fair to poor condition of the trees suggests that the City and property owners may not have properly maintained the trees. Alternatives that avoid such large-scale tree removal should be developed.

And the replacement trees do not generally relate to what's been there in the historic setting. *Melaleuca quinquenervia* is a lovely tree in the right setting, but it's an Australian native that has no connection to Pacific Grove that I'm familiar with. Natives such as the Monterey Cypress and Coast Live Oak would provide more authentic character for the Pacific Grove setting. The existing row of Red-Flowering Eucalyptus on the west side of Eardley is non-native but established and beautiful.

Fauna:

The construction impacts on the Harbor seals at Hopkins Marine Station, especially the potentially devastating impacts during pupping season on Hopkins west beach, would be intense and of long duration. This fall I observed approximately 30 out of 50 seals flushed from the beach one morning for an extended time by a small jackhammer that started working at the corner of Dewey and Ocean View. BayNet docents have observed even more dramatic flushing of seals caused by nearby construction noise, and they've worked with building and landscape contractors to encourage avoiding high noise levels during pupping season when pups can be crushed during flushing events. Seals also haul out on Fisher Beach immediately across the street from ATC, and nearby Agassiz Beach, including with their pups. The amount of noise and vibration from excavating solid granite for 260 sub-grade parking spaces, in addition to all the demolition work, has to create a substantial adverse impact. (This would be an impact under Noise & Vibration, as well as Biological Resources.) This kind of disturbance of protected marine

mammals is a major concern, and I believe the extent of demolition and construction and the methods of construction, as well as the duration, need to be reconsidered to avoid having our Harbor seal population relocate elsewhere. Also, the Aquarium has a tank or tanks across the street from the project for rescued sea otter pups, and potential impacts on those pups from such a long duration project should be assessed. Substantially reducing the size of the project and therefore the parking needs could help reduce the adverse impacts from excavation.

CULTURAL, TRIBAL, AND HISTORIC RESOURCES:

The EIR needs to consider carefully the impacts to the historic American Can Company building, which was Pacific Grove's connection to the industrial activity based on the sardine fishery, providing the cans for Monterey's canneries. While it is good to see that much of the main building would be retained, a significant portion is planned to be removed, along with the entire structures to the west. Alternatives should be considered to avoid the major alteration proposed for the façade and preserve the integrity of the original building. Preserving the buildings to the west would be more sustainable and retain the authentic setting as well.

The existence of the former Chinese fishing village at the site would necessitate exceptionally careful demolition work, as would the potential for unearthing Native American tribal/cultural resources. Archaeologist Gary Breschini spoke of a 5,600-year-old Native American residential site under the Aquarium parking lot kitty-corner from ATC, with a large number of burials. Both archaeological and tribal monitors should be required during any ground disturbance, and exceptional care should be exercised if demolition and excavation are carried out.

GEOLOGY AND SOILS:

How will the project plan for sea level rise? Will the City be expected to provide armoring in the future to protect it? Will the sewer pump station across the street be adequate to accommodate the project? Will the pump station need to be moved in the future?

LAND USE AND PLANNING:

There does not appear to be a buffer or transition to the residential neighborhood immediately to the west. Could the project incorporate affordable housing as a transition to the residential neighborhood?

Will truly affordable hotel accommodations be provided on-site?

NOISE AND VIBRATION:

See Biological Resources and Air Quality & Greenhouse Gases.

TRANSPORTATION AND CIRCULATION:

Will trucks be backing into the Sloat Avenue loading dock (see Vehicular Circulation Diagram)?
Will parking be removed from Dewey to make it two-way between Sloat and Central?

Construction would have substantial adverse impacts on traffic and parking on Central, Ocean View, and Eardley and beyond.

Since the project includes the parking lot on Central between the dry cleaners and the Aquarium's office building, does the hotel parking include replacement parking for the spaces lost by the dry cleaners and the Aquarium building? Or is the lot to be used simply as a valet-parking driveway? Is part of the hotel parking intended to replace the rest of the parking that would be displaced? How many spaces are for hotel/visitor use? And employee use?

With a total of 304 on-site valet parking spaces including 260 below grade, it is not reasonable to consider, as the EIR consultant suggested, that parking is not a concern of the assessment of environmental impacts. First, excavation for the parking is a big concern. And, removal of current off-street parking in the Central Avenue lot, in addition to removal of street parking on Sloat, would contribute to traffic problems at and near the busy intersection of Eardley and Central, and would have an adverse impact on traffic.

How would auto traffic for the residences on the western block of Sloat be affected? That looks like a nightmare for the residents. (They would also suffer noise and air quality, impacts.)

Traffic congestion during both construction and operation of the hotel would add to already overly congested conditions and pose a substantial negative impact to emergency evacuation routes and emergency response plans in terms of limited ingress/egress to the community following major disaster events—which is already an area of concern for the City, according to the Monterey County Multi-Jurisdictional Hazard Mitigation Plan.

UTILITIES AND SERVICE SYSTEMS (including water supply and demand):

It was reported at the scoping meeting that the hotel plans to use grey water for flushing toilets, presumably due to otherwise insufficient water entitlements. How feasible is that plan in terms of assuring a specific, reliable reduction in water use?

There appears to be an extravagant use of water considering that the residents of Pacific Grove are under continual pressure to conserve water for which we are charged ever increasing prices. Are the pools and spas all necessary?

CUMULATIVE IMPACTS:

What would be the cumulative impacts on traffic, circulation, and air quality when this project is added to the Hotel Durell project and the project at 520 Lighthouse Avenue in Pacific Grove and the affordable housing project that the City may be contemplating at the municipal parking lot behind the Lighthouse Cinemas?

Please ensure that the environmental impact report will study and evaluate these issues and consider all reasonable alternatives to avoid the adverse impacts.

Sincerely,
Lisa Ciani
220 Walnut Street, Pacific Grove, CA 93950



Rob Mullane <rmullane@cityofpacificgrove.org>

NOP Comments

Luke Coletti <ljc@groknet.net>

Fri, Dec 13, 2019 at 4:56 PM

To: Rob Mullane <rmullane@cityofpacificgrove.org>

Cc: "Westhoff, Steven@Waterboards" <Steven.Westhoff@waterboards.ca.gov>

Mr Mullane -

I am submitting the attached correspondence as scoping comments towards the proposed ATC project. In addition, I am requesting the EIR include a credible water demand analysis, which should include and address the MPWMD's proposed finding of Special Circumstances for the project (discussed below).

Please contact Steven Westhoff (cc'd here) with any questions regarding the Cal-Am Cease and Desist and how this project could potentially trigger Condition 2, which would limit access to potable water served by Cal-Am Water.

Finally, the City did *not* contact the SWRCB, even though a request was made to do so (see below).

Thank you for your consideration.

Luke Coletti
Pacific Grove

On 10/18/19 9:44 AM, Alyson Hunter wrote:

Thank you, Mr. Westhoff.

Alyson Hunter, Senior Planner

City of Pacific Grove | Community Development Department

300 Forest Ave, 2nd Floor Pacific Grove, CA 93950

T: 831-648-3127 Main Reception: 831-648-3183

www.cityofpacificgrove.org | **Planning website:** www.cityofpacificgrove.org/planning/

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On Fri, Oct 18, 2019 at 9:09 AM Westhoff, Steven@Waterboards <Steven.Westhoff@waterboards.ca.gov> wrote:

Ms. Hunter and all,

Though I did not need to be included in these correspondences, I appreciated the information. When scoping commences, please also include the State Water Resources Control Board.

Sincerely,

Steven Westhoff

Attorney, Office of Chief Counsel

State Water Resources Control Board

1001 I Street, 22nd Floor

Sacramento, CA 95814-2828

Email: Steven.Westhoff@waterboards.ca.gov

Phone: (916) 327-7295

Fax: (916) 341-5199



From: Alyson Hunter <ahunter@cityofpacificgrove.org>

Sent: Friday, October 18, 2019 8:53 AM

To: Luke Coletti <ljc@groknet.net>

Cc: Rob Mullane <rmullane@cityofpacificgrove.org>; Anastazia Aziz <aaziz@cityofpacificgrove.org>; Westhoff, Steven@Waterboards <Steven.Westhoff@waterboards.ca.gov>

Subject: Re: ATC Complete for Processing Letter

Mr. Coletti -

The preparation of the EIR is a process that will take several months and can occur stages based on information available. I don't believe anyone in the City is asserting that CEQA review will be completed without the proper water documentation and analysis. There is no reason why the many other aspects of environmental review cannot commence while we wait on the water information.

We have received and acknowledged your comments on this issue and concur that water is a critical component of this - and all - development projects. When formal agency scoping occurs, we will include the RWQCB as is standard practice.

Thank you,

Alyson Hunter, Senior Planner

City of Pacific Grove | Community Development Department

300 Forest Ave, 2nd Floor Pacific Grove, CA 93950

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On Thu, Oct 17, 2019 at 9:35 PM Luke Coletti <ljc@groknet.net> wrote:

Hello Alyson and Rob -

Again, from the Dec 15, 2018 MPWMD agenda report (text below), the District will require the City to make CEQA findings in support of the determination of "special circumstances."

If actual water use exceeds the preliminary Water Use Capacity estimate, then the District will debit the Jurisdiction's Allocation (PGLWP entitlement - MPWMD Ord 168). Prior to issuance of the Water Permit by the District, the Jurisdiction must acknowledge in writing the potential debit to its Allocation, as well as authorize the District to issue a Water Permit based on a finding of Special Circumstances consistent with CEQA compliance for the proposed Project.

<https://www.mpwmd.net/asd/board/boardpacket/2018/20181015/17/Item-17.htm>

I don't see how meaningful CEQA analysis can be performed without knowing the water demand first - it's fundamental to the entire design. The Water Demand Analysis must be done prior to the DEIR.

Thank you for your consideration.

Luke Coletti
Pacific Grove

On Oct 17, 2019, at 3:15 PM, Luke Coletti <ljc@groknet.net> wrote:

Hello Again -

One last point - because this site was recently rezoned it is subject to Condition 2 of the Cal-Am CDO and therefore the following conditions, listed in the MPWMD agenda report, would likely violate both the Cal-Am CDO and the City's SWRCB financing agreement for the Local Water Project -

If actual water use exceeds the preliminary Water Use Capacity estimate, then the District will debit (transfer from) the Jurisdiction's Allocation (PGLWP entitlement - MPWMD Ord 168). Prior to issuance of the Water Permit by the District, the Jurisdiction must acknowledge in writing the potential debit to its Allocation, as well as authorize the District to issue a Water Permit based on a finding of Special Circumstances consistent with CEQA compliance for the proposed Project.

Proceeding with the DEIR without first developing/verifying/approving the project's Water Demand Analysis would be extremely poor planning on several fronts and would be a significant liability for the City.

Thank you for your consideration.

Luke Coletti
Pacific Grove

On 10/17/19 2:49 PM, Luke Coletti wrote:

Hello Rob and Alyson -

Here are links to Agenda Item 17 of the October 15, 2018 MPWMD Board Meeting - Consider Determination of Special Circumstances for 125 Ocean View Blvd., Pacific Grove, CA. (combined in attached PDF)

Video:
<https://youtu.be/4RGGNem2hec>

Agenda Items:
<https://www.mpwmd.net/asd/board/boardpacket/2018/20181015/17/Item-17.htm>
<https://www.mpwmd.net/asd/board/boardpacket/2018/20181015/17/Item-17-Exh-A.pdf>
<https://www.mpwmd.net/wp-content/uploads/Oct-15-2018-Board-Mtg-Item-14.pdf>

In Mr Mullane's October 4, 2019 letter (attached) I was very glad to see the following:

1. A completed MPWMD Water Release Form/Water Permit Application. Please provide the factual basis supporting the proposed "special circumstances" designation for the subject property, and note how those circumstances are anticipated to reduce water demand as compared to MPWMD water use factors;

However, only the Water Demand Analysis can provide *the factual basis supporting the proposed "special circumstances" designation* and therefore it cannot be deferred to the post-discretionary approval process - as conveniently requested by the developer. Instead, it **must be used** for the preparation of the Draft EIR.

Thank you for your consideration.

Luke Coletti
Pacific Grove

On 10/17/19 11:37 AM, Alyson Hunter wrote:

Hello Mr. Coletti -

Please find the letter you requested attached.

Thank you,

Alyson Hunter, Senior Planner

City of Pacific Grove | Community Development Department

300 Forest Ave, 2nd Floor Pacific Grove, CA 93950

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12-13-19
Pacific Grove

Dear Mr. Rob Mullane, Contract Project Planner:

I am writing in regard to the proposed hotel project at the current American Lin Cannery.

I am very concerned on a number of issues. I am very upset at the prospect of cutting down over 75 trees. At this critical time of global warming, this should not be allowed. To cover the entire area with the project is horrible.

Very close to the American Lin Cannery are many Harbor Seals — protected marine mammals. They would be terribly impacted by the noise, air quality, and traffic caused by the demolition & construction at the site.

The impact on the community of residents and tourists would likewise be terribly impacted by the above.

All in all I believe this project is a very bad idea & should be scrapped.

We do not need a hotel for the ultra rich. We desperately need affordable housing. Wouldn't that be a better use for the American Lin Cannery!

Thank you for reading my letter.

DEC 13 2019

CITY OF PACIFIC GROVE
COMMUNITY DEV DEPT

Sincerely,
Lynn Mason
831-372-8897

P.D. Browne J
Pacific Grove, CA
93950



Rob Mullane <rmullane@cityofpacificgrove.org>

Comments on Tin Cannery Resort Proposal

Mary Gleason <mgleason1111@gmail.com>

Fri, Dec 13, 2019 at 6:21 PM

To: rmullane@cityofpacificgrove.org

City of Pacific Grove-

As a longtime resident of Pacific Grove, I am concerned about the proposed resort for the American Tin Cannery site. I would rather not have a large resort / hotel at that site at all and would prefer a more forward-looking development that provides arts and entertainment, jobs, and housing. The Swift Street Courtyard in Santa Cruz and the Packing House in Anaheim are good models. These vibrant developments attract youthful visitors and are something really needed in this town. We do not need a big resort!

This proposed resort development should be critically evaluated for the impacts it will have on our community. I am particularly concerned about:

1. Climate /greenhouse gas impacts and sustainable design.
2. Impacts to the viewshed (eg coming down Erdley street) of a Large Resort
3. Impacts to the character of that neighborhood and our town.
4. Traffic and crowding around that neighborhood
5. Impacts to the economic viability of Asilomar conference Center - our historic "resort" that is underutilized - as well as our local inns.
6. Impacts to the environment generally, and to the harbor seal pupping beach and local water quality.
7. Cultural impacts of "resort culture" on our community.

Thank you,
Mary Gleason
[405 Gibson Ave](#)
[Pacific Grove CA](#)



Alyson Hunter <ahunter@cityofpacificgrove.org>

Cannery Hotel

Margot Pratt <margotpratt@gmail.com>

Fri, Dec 13, 2019 at 3:59 PM

To: ahunter@cityofpacificgrove.org, Vaughan Pratt <pratt@cs.stanford.edu>

To the City of Pacific Grove:

As owners of [165 Ocean View Blvd](#), we are one house away from the proposed hotel and are concerned about the possible impact of the hotel on our quality of life, specifically, from light and noise and added traffic. Is there any effort being made to limit the direction, timing, and scope of the outdoor lighting? Will there be any controls on sounds, such as music, especially in the evenings? We would like to continue to feel that we're in a residential neighborhood, rather than part of a commercial area.

Apart from that, we would welcome having the Monterey Cypresses across the street from the cannery trimmed to a lower height. Our view of the hills and city lights has gradually diminished as the trees have grown. We imagine the the hotel would also want to enhance the view for their guests, so trimming the trees would benefit us all.

Margot and Vaughan Pratt

[165 B Ocean View Blvd, Pacific Grove, CA 93950](#)

650-494-2545

Rob Mullane <rmullane@cityofpacificgrove.org>

COMMENTS ON THE SCOPE OF THE EIR for the AMERICAN TIN CANNERY

Nancy Runyon <nancy@nancyrunyon.com>
To: rmullane@cityofpacificgrove.org

Mon, Dec 2, 2019 at 7:07 PM

Rob Mullane, AICP

Contract Project Planner

City of Pacific Grove, CA

rmullane@cityofpacificgrove.org

RE: COMMENTS ON THE SCOPE OF THE EIR for the AMERICAN TIN CANNERY

ISSUE 1: The American Tin Cannery building is the one last of the intact cannery buildings from a very important historical era on the Monterey Bay. It is adjacent to Monterey's Historic Cannery Row District found eligible for the National and California registers by the Architectural Resources Group survey in 2001. I am sure the American Tin Cannery would also be found eligible because, of course, it is **historic**.

The City of Pacific Grove should remember that just being eligible is enough for all the protections of the California Environmental Quality Act to apply. A hotel or conference center use can easily adapt the building, retaining its unique architecture and hopefully restoring more of the original materials and character than the shopping complex did.

ISSUE 2: As a resident of New Monterey, adjacent to Pacific Grove, I also want to remind the City of Pacific Grove that all **traffic** (unless coming through Pebble Beach only) for any American Tin Cannery re-use must travel through the New Monterey neighborhood; specifically on Lighthouse Avenue or David Avenue. A hotel may bring additional revenue for Pacific Grove and end up causing additional expenses and problems for New Monterey. Mitigations for an already traffic-overburdened Lighthouse Avenue in Monterey, and Environmental Justice between the two cities, is definitely required.

I remember well attending a presentation on the proposed Hotel Bella project a few years ago, where I asked the developers what they planned for the increased traffic on Lighthouse Avenue. Their response was "don't worry, there won't be any increased traffic on Lighthouse (in Pacific Grove), all the traffic will be in Monterey"...! This remark was from a developer who did not live here. Residents of Pacific Grove who need to travel on Lighthouse and David Avenues in Monterey just to get home, may not appreciate additional traffic either.

12/3/2019

City of Pacific Grove Mail - COMMENTS ON THE SCOPE OF THE EIR for the AMERICAN TIN CANNERY

Thank you for thoroughly examining these two issues in the Environmental Impact Report for any new use of the American Tin Cannery building.

Nancy Runyon

[1195 Hoffman Avenue](#)

[Monterey, CA 93940](#)

831-649-8132 home

nancy@nancyrunyon.com



Rob Mullane <rmullane@cityofpacificgrove.org>

NOP for the ATC site

Rudy Fischer <rudyfischer@earthlink.net>

Fri, Dec 13, 2019 at 12:30 PM

To: "rmullane@cityofpacificgrove.org" <rmullane@cityofpacificgrove.org>

Comment on the Project Notice of Preparation for the proposed American Tin Cannery Hotel and Commercial Project.

Rob;

I wish to comment on the ATC hotel project that has been proposed, and find that it is a great improvement over what the city has now - and has had - in that location for many years.

Replacing the 165,000 square feet of "factory outlet" and related uses with a new hotel and commercial uses is the appropriate and sensible thing to do. By providing 225 guest rooms in two primary guest wings, as well as a restaurant, bars, and other much needed meeting space along the Ocean View Boulevard the project brings back a "dead zone" in the city of Pacific Grove.

Including the approximately 20,000 square feet of street retail space should also help the city's retail sector greatly. There is now little such modern space available in the city, though I believe there is a demand for it. The revenue the overall project will provide the city will also help with our long-term finances.

The work to be done at this site to build the project – and its potential environmental impact – is reasonable for this location and for the results derived once completed. Having a decaying property in this location gives visitors a negative impression of Pacific Grove as a slightly "tattered" and decrepit city. Being near the Monterey Aquarium, restaurants, and other tourist magnets should make it an attractive place for visitors to stay. This is the perfect project for this location and has been extremely well designed the thought out.

I think some of the projects that others have mentioned for this project are financially irresponsible and would only add to the financial difficulties the city is already facing. In short, I urge the city to move forward with this excellent projects as quickly as possible.

Regards,

Rudy Fischer

[59 Country Club Gate](#)

[Pacific Grove, CA 93950](#)

(831) 236-3431

rudyfischer@earthlink.net



Rob Mullane <rmullane@cityofpacificgrove.org>

New 5 acre development at ATC

skip kadish <skadish49@gmail.com>
To: rmullane@cityofpacificgrove.org

Wed, Dec 11, 2019 at 6:07 AM

Dear City of Pacific Grove,
I do not support this project.
It is too large. It will add to the traffic problem of Pacific Grove and Monterey.
It will add air pollution and noise pollution.
If you were to propose a project that would add fun into people's lives and more fully unite the citizens of our community I might say yes but this does not add to the betterment of our social living conditions.
Please do not consider only the fiscal impact of this proposal. Does it really add to the character of Pacific Grove?
Thank you for hearing my opinion.
Skip Kadish 831-601-3057



Rob Mullane <rmullane@cityofpacificgrove.org>

ATC Hotel roject EIR

Susan Pierszalowski <heronmoon@yahoo.com>

Fri, Dec 13, 2019 at 4:40 PM

To: "rmullane@cityofpacificgrove.org" <rmullane@cityofpacificgrove.org>

Dear Mr. Mullane,

I am writing to express my concerns regarding the ATC Hotel Project EIR. There are many environmental issues and my following list is not in the order of importance.

- 1) Air quality during demolition and construction will be negatively impacted. How many trucks and heavy equipment will be on site during excavation, removal of debris etc?
- 2) The loss of 75 mature trees negatively impacts air quality and results in loss of habitat and contributes to climate change. This is not a small matter.
- 3) Disturbance of Harbor seals at Hopkins, especially during pupping season. As a Bay Net Volunteer I have observed the flushing of this protected marine mammal species due to nearby construction noise. The size of this project and the noise and vibration of excavation for underground parking, not to mention the demolition and construction itself is bound to negatively impact these animals. The rich wildlife of the Monterey National Marine Sanctuary must be protected.
- 4) The project area is a former Chinese fishing village-has an archeological survey been considered? In addition Native American tribal and cultural resources must be honored by having a tribal monitor on site during any ground disturbances.
- 5) During peak summer months traffic and congestion intensifies with Central, Lighthouse and Foam streets often backed up for blocks. This afternoon, when returning from work at 3pm, all available parking spaces on either side of the ATC were taken. Parking spaces up Eardley and Dewey were also filled. Tourism is increasing and to see all these spaces taken on a winter afternoon was surprising. It has been noticed that there is no "off" tourist season in Pacific Grove. Where will all these visitors park? What happens when streets are clogged with vehicles and an emergency occurs? This project will definitely impact the flow of traffic in the area.
- 6) The footprint of this project is massive and out of keeping with the neighborhood. While true, there is the Aquarium, a grocery store and other businesses nearby, there are primarily private homes in the immediate area of this project. Story poles need to be in place to indicate exactly how large this project will be. Full transparency as this project moves forward is essential

My concerns about water, aesthetics etc. won't be addressed here as the deadline for submission of comments is approaching.

Thank you for your time.

Respectfully,

Susan Pierszalowski
Pacific Grove resident



Rob Mullane <rmullane@cityofpacificgrove.org>

Comments for EIR scoping of ATC hotel proposal

Thom Akeman <thomakeman@sbcglobal.net>
To: Rob Mullane <rmullane@cityofpacificgrove.org>
Cc: Anastazia Aziz <aaziz@cityofpacificgrove.org>

Wed, Nov 27, 2019 at 11:34 AM

Comments for EIR scoping of hotel application for ATC site, Pacific Grove Permit Application **AP/UP/TP-D 19-0363**

To: Rob Mullane, Contract Planner
CC: Anastazia Aziz, Community Development Director

From: Thom Akeman
Nov. 27, 2019

To Whom It May Concern:

I will be out of town and unable to attend a scheduled EIR scoping session, but I have particular concerns about 2 environmental impacts caused by the proposed development of a 225-room hotel at the American Tin Cannery site in Pacific Grove and hope they will be considered in the EIR.

The first concern is the colony of harbor seals that live on the beaches and rocks at Hopkins Marine Station just across Ocean View Boulevard from the site. These seals have habituated those rocks and beaches since 1967 and are protected by the federal Marine Mammal Protection Act. Docents for Bay Net, the shoreline group of docents for the Monterey Bay National Marine Sanctuary, have seen up to 400 harbor seals there at one time. During the spring pupping months docents have seen as many as 90 baby seals born there. Harbor seals are generally nocturnal, going out into the ocean at night to forage for food then getting out of the water in daytime to rest and sleep.

Of the 3 shoreline locations they regularly utilize at Hopkins, one is a beach approximately 200 feet from the American Tin Cannery. Another is the rocks behind the Hopkins buildings. The third and most used site is a beach just west of the buildings, alongside the city's recreation trail.

I am obviously concerned about nearby construction noises disrupting the seals in their long-term habitat. I am especially concerned about the proposal to develop underground parking for the hotel. As I understand it that area is basically granite and any removal of granite – by blasting, drilling, fracking or just digging – could be extremely noisy and disruptive. Such activity in that area might require the developer to first obtain a “take permit” from the U.S. Fish and Wildlife Service for possible impacts to the harbor seals.

While any disturbance could be a violation of federal law, disturbances that scare new mothers from their dependent pups during the birthing/nursing process could result in the death of the abandoned babies.

While I am not a federal employee and have no authority to determine when take permits are necessary, I believe officials at NOAA's Monterey Bay National Marine Sanctuary office in Monterey could provide information and/or referral to the proper section or person at the Fish and

Wildlife Service. I have been a volunteer Bay Net docent for 16 years and have spent thousands of hours observing, recording and reporting on the harbor seals that live around Hopkins. My wife, Kim Akeman, is also a long-time docent and maintains a Facebook page "Harbor Seals of Pacific Grove" that has shared thousands of pictures, videos and informative posts that have attracted 9,500 daily followers.

Secondly, as a Pacific Grove resident concerned about the environment, I'm very concerned about the removal of so many healthy trees for this project. I don't believe there can be adequate mitigation for the loss of wildlife, air exchange and aesthetic values by removing so many natives. I would hope the project could be redesigned in order to save some of the natural resources our environment needs.

I had one quick thought while looking at a proposal to remove healthy trees in order to build a hotel that would include atriums with new trees in them. Why not have the architect move his pencil around and draw the "atriums" around some of the existing trees in order to save them and preserve their natural values? Some of those cypress trees are beautiful and should be considered community treasures and maintained at any inconvenience to the developer.

Thank you for your attention and consideration.

--Thom Akeman

thomakeman@sbcglobal.net

228 18th St.

Pacific Grove, CA 93950

 **ATC EIR.doc**
61K



Rob Mullane <rmullane@cityofpacificgrove.org>

Cannery Hotel

Thomas Clark <claragehomes@gmail.com>
To: rmullane@cityofpacificgrove.org

Wed, Dec 11, 2019 at 2:33 PM

Hello Rob, I am writing to you about our concern of the extremely large project that is under consideration on Ocean Avenue.

First of all, I can not believe that the City of Pacific Grove would even consider such a massive project so close to the coastline. I feel that the city is motivated by financial gains and not considering the charm Pacific Grove has to offer as is or what we think. This project is by far the largest construction project that Pacific Grove has ever had. With this said, there must not be much concern for the local citizens and wild life along the coast. Especially the Harbor Seals. This project will bring extreme congestion to the roads for tourist. Residence of Pacific Grove will have to deal with the traffic, noise and disruption to our everyday peaceful life style which is why we choose to live here in this so called Last Small Home Town.

I am a developer as well, and I am not sure that the city understands the size and magnitude of this project. It would take over a year to build if every thing goes as planned, but if anyone knows building, issues always arise especially on large project which will cause more delays and time. This project will cause so much disruption and havoc to Ocean Avenue area and the Aquarium. Plus with a project this size the city would have to dedicate at least a few employees full time to watch over the project, like inspectors, engineers, pubic works, the list goes on and on. Because the city has never been through a large project like this before this may not of even been thought through. The city building and planning staff are already having a hard time keeping up with the general every day building and remodels that are happening now.

Water resources???? I have a hard time every time I do a project here in Pacific Grove with Water Credits. I know now that the city is currently selling water credits, but do we want to give them all to one project? I know people have been waiting for a long time, and now something like this comes up which will take more water than one can imagine. I just don't understand, how this project could be so fortunate to get so many water credits. Once again is this a financial gain opportunity for the City?

The size of the project is way out of proportion. Why do we need such a large hotel like this is beyond me. This large structure will be taking away many of our Ocean Views from our homes that we have come to love and enjoy. This building will decrease our home values because of the blocked views if this happens. But I guess this doesn't matter to the City, after all it is not effecting your views and homes.

Please keep me posted on the status of the project, because we will be fighting this all the way. I know that the City already went through this a few years ago with another developer and lost our City a large amount of funds. Shame on us if this happens again. The City should put this up for a vote just like the VRBO rental housing issue which was voted on last year. I am sure that the Citizens for Pacific Grove would not support this project being built. Have you even considered our opinions. There is not a lot of information that the City is putting out there for us to see. If one is not that involved in City Council meetings they are going to be blindsided by this. Can you please keep us more informed through mail flyers with upcoming events that will be taking place so we as the Citizens of Pacific Grove can keep abreast of this issue.

Thanks

--

Tom Clark
Clarage Homes
Real Estate Investor



Rob Mullane <rmullane@cityofpacificgrove.org>

Public comment re: ATC Hotel Project EIR

Will Bee <pacificnomad53@sbcglobal.net>
To: rmullane@cityofpacificgrove.org

Thu, Dec 12, 2019 at 12:32 PM

I live in the Retreat area of PG and am directly impacted by this project. The traffic on Lighthouse (New Monterey) it took me 45 mins

to go from Irving St to @nd St PG. Reducing 2 lanes to one lane--at the New Monterey/PG (David Ave) has created a LOG JAM.

Just to "beautify" the entrance to PG, seems to me, one would want people to flow thru and enjoy the Scenic Drive (Oceanview)

and let the locals head home instead of being stuck in traffic. I'm afraid with more people & cars it will become even more intolerable.

Don't forget that PG ONLY has 2 ways out. Highway 68 and Lighthouse(New Monterey) since going thru Presidio was closed off

to local travel since 9/11. PLEASE consider locals as we live here and have needs too.

I would also like to address the need to establish a standard of measurement for height pole or building with starting base line

at the middle of street NOT AT PROPERTY LINE that has been raise to add extra heights. By measuring from middle of street

to height (30')--a height line straight to where building will be and there you have a "ACCURATE' height. They do this measurement on

property on hillsides.

In Ventura, a developer got approval for 90 room assisted living place and housing for it. He spent a year transporting dump truck loads of FILL to raise the land. It resulted in views (oceanview) but at the expense of the OLDER tract home's PRIVACY. There is a lawsuit now. Same may happen in PG if left unregulated.

Also the traffic flow when you add all the people , impact wasn't addressed and during the THOMAS Fire (2017) traffic was

stopped and no where to go after evacuation orders came down... serious safety concerns.

Please consider all possibilities, there has to be a middle ground the will benefit locals, businesses and local government.

Thank you

Wil



Rob Mullane <rmullane@cityofpacificgrove.org>

Concerns about ATC Hotel Project

Ximena Weissbluth <ximenawaissbluth415@gmail.com>
To: rmullane@cityofpacificgrove.org

Fri, Dec 13, 2019 at 2:04 PM

Dear Mr Mullane,

I'm writing to express some concerns with the ATC Hotel Project, the details of which just recently came across my desk.

The renderings show what appears to be a massive, outsized project for the scale of the area; hence, we respectfully request that the city require story poles to show exactly what the size of the project will be. Without the story poles it is very difficult to envisage from drawings what the scale will be, and residents have a right to know and understand something that will be so impactful to our community.

A huge hotel as the gateway in to PG is anathema to the very culture that people travel from afar to see and enjoy. Moreover, the renderings show a modern architectural style that has NOTHING to do with the character of quaint Pacific Grove. People like to visit PG for it's cute houses and small town feel- this project exudes exactly the opposite.

Also of concern is that the size of the project will translate into a traffic and congestion nightmare for residents and tourists alike. No matter how much one tries to re-route traffic, the fact is this project will bring in many more automobiles than already come in to PG, which means air quality issues.

Thank you for addressing these concerns,
Ximena Weissbluth
PG resident since 1996

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
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CITY OF PACIFIC GROVE
COMMUNITY DEV DEPT
December 13, 2019

Rob Mullane
City of Pacific Grove
300 Forest Avenue
Pacific Grove, CA 93950

**Subject: Notice of Preparation (NOP) for the American Tin Cannery Site Hotel Project
(SCH# 2019110152)**

Dear Mr. Mullane:

Thank you for providing us with the Notice of Preparation (NOP) for the American Tin Cannery Hotel and Commercial Project draft Environmental Impact Report (EIR). The 5.59-acre project site is located at 125 Ocean View Boulevard in the City of Pacific Grove. The proposed project would redevelop the four parcels at the American Tin Cannery site as a new hotel. Proposed construction activities include grading, tree and vegetation removal, partial demolition and renovation of the existing American Tin Cannery building, construction of a subterranean parking garage, and construction of a multi-story building to establish the new 225-unit hotel and related commercial uses. The hotel is proposed to include approximately 20,000 square feet of street retail uses on the ground floor along the Ocean View Boulevard frontage and two hotel guest wings (Family/Group Wing and Executive Wing) on the upper floors, each with a distinctive visitor experience with respect to amenities and services.

Generally speaking, we have been supportive of the concept of a hotel at this highly visible location adjacent to the shoreline, the City's public access trails, and the Monterey Bay Aquarium, as it is a prime spot for a visitor-accommodations use. That being said, there are issues that will need to be addressed. Given the magnitude of the project and its location, special consideration must be given to water availability, cost of accommodations, coastal hazards, tree removal, parking availability, and limiting impacts to coastal views. All of these issues will need to be addressed through the coastal permitting process and thus we would encourage the CEQA document to address them at this early stage.¹ With that in mind, please consider the following comments on the NOP:

Jurisdiction and Coastal Permitting Authority

The Commission recently approved the City of Pacific Grove's Land Use Plan (LUP), along with a new Implementation Plan (IP), for a complete Local Coastal Program (LCP). The City still needs to accept the Commission's approved modifications in order for the LCP to be in effect. Until then, the Coastal Act will be the standard of review, with the Commission-approved LCP as guidance. And note that the Commission-approved LCP contains specific policies and

¹ Please note that we previously submitted preliminary comments on the project to the city on July 12, 2019 and it is unclear whether there have been any significant changes to the project since that time.

standards for a hotel at this site (for example, see IP Section 23.90.180(C)(5)(g) for standards specific to the American Tin Cannery site, as well as IP Section 23.90.220(C) regarding the provision of lower-cost visitor accommodations in hotel projects). Thus, we strongly encourage the City to evaluate this project for conformance with the Commission-certified LCP. Please also note that until the LCP is certified, the Commission retains all CDP permitting functions in the City. Should the LCP be certified, the City of Pacific Grove would process the CDP. The EIR should also disclose that a portion of the project as proposed is located within the Commission's appeal jurisdiction.

Water

There is a significant water shortage problem in the greater Monterey peninsula, including within the Monterey Peninsula Water Management District's service territory, which is resulting in ongoing coastal resource degradation of the Carmel River. The proposed project includes 225 hotel rooms, hotel spa, multiple pools, and other facilities that would generate a significant water demand. The Coastal Act allows approval of new development where it has been clearly demonstrated that adequate water supply is available to serve the development. Furthermore, the Commission approved LCP contains specific development provisions for water supply and conservation (LUP section 3.4.4) including that provisions that individual private water systems including desalination facilities, except for rainwater collection, are prohibited (INF-2). Thus, the EIR for the proposed project should demonstrate that the development will be served by an adequate existing water allocation as well as sustainable long-term water supply by analyzing the water demands and water sources in order to be consistent with these requirements. We also suggest inclusions of a robust water offset and mitigation program.

Low-Cost Accommodations

The proposed hotel project is broken up into two "wings": the Executive Wing and the Family/Group Wing. Projected average room rates are not discussed in the project description but the distinction and title of each respective wing suggest that the Family/Group Wing may provide lower cost accommodations and/ or provide room amenities that would serve as a lower cost option for families (e.g. additional beds per unit, suite facilities, kitchen facilities, etc.). The Coastal Act protects lower-cost visitor-serving facilities, including overnight accommodations, by requiring visitor-accommodating development projects that would have adverse impacts on lower-cost accommodations to do one of the following: ensure lower-cost accommodations are provided onsite; ensure an equivalent number of lower-cost units are created off-site, or; pay into an "in-lieu" fund that will be used to create an equivalent amount of new lower-cost accommodations to be constructed elsewhere. The Commission has typically required at least 25% of proposed rooms be lower cost. In order to assess if the proposed project would adversely impact lower-cost visitor accommodations, a feasibility analysis as well as an impact analysis must be completed. Please refer to Commission approved IP Section 23.90.220(C) regarding lower-cost accommodations and the required analyses. Ultimately, the EIR should clearly explain whether the project includes high, low, and moderate cost rooms, and explore ways to maximize low-cost accommodations in one of the ways described above.

Coastal Hazards

Although located on the inland side of Ocean View Boulevard, the proposed hotel development on the site may be subject to natural coastal hazards, including large winter waves and bluff erosion, within the life of the project. The proposed project includes at least one subterranean parking garage that may be particularly susceptible given its elevation. The Coastal Act requires that new development minimizes risks to life and property in areas of high geologic, flood, and fire hazard. Thus the project should be designed to avoid/minimize impacts from coastal hazards, including but not limited to, erosion, episodic and long-term shoreline retreat, flooding, inundation, storm waves, high seas, tidal scour, and tsunamis, including in relation to sea level rise, over the life of the development. In order to assess the risk from coastal hazards, a site specific hazards report prepared by a qualified geologist/engineer will be required, the purpose of which is to ensure that such development can be built in a manner consistent with applicable coastal hazards policies. The EIR should evaluate coastal hazards at the project site and additional information on coastal hazard assessment specifications can be found in section 23.90.140 of the approved IP.

Parking

The American Tin Cannery building is currently occupied by retail stores, restaurants, and recreational uses with approximately 147 uncovered parking spaces dedicated to such existing uses. The proposed project includes a 225-room hotel, a restaurant and bars, meeting and gathering spaces, and a spa and fitness center with a total of 304 valet/off-street parking spaces for such uses. The Coastal Act requires that public access and recreational opportunities be maximized. This typically means that new development must provide adequate, appropriately-distributed off-street parking in order to protect on-street parking for coastal access uses. In order to ensure adequate parking is provided by the project in accordance with policy 23.90.180.5.C of the Commission approved IP, the EIR should demonstrate that the number of off-street parking spaces reflects both customer and employee parking needs are provided on-site and that it does not conflict with public coastal access parking needs. The EIR should consider factors including the size of the lot, proximity to the shoreline, and adequacy of public parking opportunities for public coastal access in the vicinity as well as additional measures to address non-vehicular access options, including bike rentals, "park once" strategies, and other transportation demand management (TDM) measures. Please note that bike racks are required by the project (LUP policy INF-19) and should not be considered when determining the appropriate number of off-street parking spaces. Lastly, the EIR should discuss the allocation of parking spaces per type of hotel room (executive vs/ family/group) and how the number of designated spaces per room type is appropriate to accommodate the number of guests/beds expected per room. For example, family/group rooms are designed to contain additional beds to accommodate families or groups and the ratio of parking spaces to each room type should reflect the number of individuals expected per room. The EIR should address how the allocated number of parking spaces is appropriate for the increased number of guests and thus is not expected to impact the remaining non-designated parking spaces provided for those using the conference/meeting areas, shopping in the 20,000 square feet of retail space, or employee parking.

Coastal Community Design Standards

The project site slopes down from Central Avenue to Ocean View Boulevard towards Monterey Bay. Given that the parcels are located along the first public road from the ocean and act as an important gateway transitioning from Monterey's historic Cannery Row to the City of Pacific Grove, the project site is subject to design standards for development under the Commission approved LCP. Section 23.90.180.5 of the approved IP provides Commercial Design Standard provisions specific to the ATC site, including maximum building height of 40 feet, maximum site coverage of 90 percent, and building setbacks of 8 feet. Under the approved LCP, buildings and other structures may be allowed up to 40 feet in height as measured from existing grade, with an allowance of an additional eight feet for mechanical appurtenances. Thus, any minor rooftop structures may not exceed 48 feet (measured from existing grade) and any such structures must be appropriately screened to protect public views. Please ensure that building heights are appropriate heights to ensure that existing blue water views from public vantage points are predominantly maintained to the maximum extent feasible. In addition, new development that fronts Ocean View Boulevard must include story step-backs and building articulation to ensure that structures do not appear as large flat planes. The EIR should contain visual simulations and explore the various building and height scenarios to best meet LCP and Coastal Act objectives of ensuring no blockage of existing blue water views from public vantage places, and ensuring that there are step-backs and articulation to avoid domineering over the Recreational trail and Ocean View Blvd. In regards to the maximum allowable site coverage, please note that site coverage may only be allowed up to 90 percent of the total site area if the project includes public amenities that enhance public access (e.g., public restrooms, seating areas, sidewalk and roadway access improvements on- and offsite, etc.) beyond that which is required by the Commission approved LCP for compliance with other requirements. Otherwise, site coverage may be decreased if substantial public coastal access amenities are not incorporated into the project.

In addition, the proposed project includes visitor-serving facilities including 20,000 square feet of street retail uses on the ground floor, restaurants, some indoor/outdoor gathering areas, and a rooftop bar. However, it does not appear that these visitor-serving amenities would constitute general public access amenities because they typically will require the purchase of food, beverages, or other commodities. The EIR should therefore consider including public restrooms, and outdoor patio or seating areas that can be used without the need to purchase any products. Section 23.90.080.F of the Commission approved IP requires that the project supports the LCP goal of providing for visitor-serving needs as appropriate, including providing low and no cost visitor and recreational facilities. The EIR should discuss what low and no cost visitor and recreational facilities are included in the project and how these facilities project supports the before-mentioned goal of the LCP. Lastly, the single site plan submitted with the NOP shows a building setback of zero feet along Ocean View Boulevard. Please note that there is a minimum building setback of eight feet.

Rob Mullane
American Tin Cannery Site Hotel Project NOP Comments
December 13, 2019
Page 5

In conclusion, thank you for the opportunity to comment on the NOP. We are generally supportive of reutilization of this historic site to enhance visitor-serving uses, but we are also mindful of the potential adverse impacts to sensitive coastal resources resulting from the proposed hotel project and believe that addressing these issues early on will help facilitate the permitting process. We look forward to working through the above issues as you work through the local and/or Commission permitting processes. Please do not hesitate to contact me at (831) 427-4865 if you have any questions or would like to further discuss these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'AMC', with a long horizontal flourish extending to the right.

Alexandra McCoy
Coastal Planner
Central Coast District Office