



County of Monterey Planning Commission

Agenda Item No.6

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Item No.6

Board of Supervisors
Chambers
168 W. Alisal St., 1st Floor
Salinas, CA 93901

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PLN220053 - TEDFORD JEFFREY R & DONNA M TRUST

Public hearing to consider major remodel of a 3,107 square foot single family dwelling, resulting in a 7,071 square foot single family dwelling, and associated site improvements, including new and replacement accessory structures (covered entry, sheds, loggia, terraces) and re-configuration of the driveway. The project also involves after-the-fact development on slopes in excess of 30 percent, restoration of previously disturbed areas with native coastal scrub plants, development within the Critical Viewshed, within 100 feet of environmentally sensitive habitat, and within 750 feet of known archaeological resources.

Project Location: 31525 Highway 1, Carmel

Proposed CEQA action: Find that the project qualifies for Class 1, Class 2, and 33 Categorical Exemptions pursuant to CEQA Guidelines sections 15301, 15302 and 15333, and that none of the exceptions from CEQA Guidelines 15300.2 apply.

RECOMMENDATION:

It is recommended that the County of Monterey Planning Commission approve a resolution:

- 1) Finding that the project qualifies for Class 1, Class 2, and 33 Categorical Exemptions pursuant to CEQA Guidelines sections 15301, 15302, and 15033, and that none of the exceptions from CEQA Guidelines 15300.2 apply; and
- 2) Approving a Combined Development Permit consisting of the following.
 - a. A Coastal Administrative Permit and Design Approval to allow major remodel of an existing 3,107 square foot single family dwelling resulting in a 7,071 square foot dwelling, demolition of accessory structures (covered entries, sheds and loggia) and construction of a 189 square foot storage shed, 385 square foot loggia, 581 square feet of terrace, and 112 square foot covered entry with associated site improvements of 428 square feet of at-grade patio and re-configuration of the driveway adding 382 square feet of pavement;
 - b. A Coastal Development Permit to allow development in the Critical Viewshed;
 - c. An after-the-fact Coastal Development Permit to allow approximately 5,140 square feet of development on slopes in excess of 30 percent
 - d. Restoration of approximately 2,500 square feet of development on slopes in excess of 30% and approximately 12,500 square feet of previously disturbed areas with native plants;
 - e. After-the-fact Coastal Development Permit for development within 100 feet of environmentally sensitive habitat area (maritime chaparral/coastal scrub/sagebrush coastal scrub); and
 - f. A Coastal Administrative Permit to allow development within 750 feet of archaeological resources.

The attached draft resolution includes findings and evidence for consideration (**Exhibit A**). Staff recommend approval subject to seven conditions of approval.

PROJECT INFORMATION:

Owner: Tedford Jerry and Donna M. Trust

Agents: Jun Sillano, International Design Group, and Anthony Lombardo, Anthony Lombardo & Associates

APN: 243-221-030-000

Zoning: Watershed and Scenic Conservation with a Density of 40 acres a unit and a Design Control Overlay in the Coastal Zone or “WSC/40-D(CZ)”

Parcel Sizes: 4.96 acres

Plan Area: Big Sur Coast Land Use Plan

Flagged and Staked: Yes

Planner: Mary Israel, Supervising Planner

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SUMMARY:

The Tedford project consists of major remodel of an existing 3,107 square foot single family dwelling resulting in a 7,071 square foot dwelling, demolition of accessory structures (covered entries, sheds and loggia) and construction of a 189 square foot storage shed, 385 square foot loggia, 581 square feet of terrace, and 112 square foot covered entry with associated site improvements of 428 square feet of at-grade patio and re-configuration of the driveway adding 382 square feet of pavement on a 4.96-acre parcel on the east side of Highway 1 in the Victorine Ranch area of Big Sur.

Approximately 7,640 square feet of non-structural development on the parcel was done in 2022 on natural slopes greater than 30 percent, approximately 75 feet northeast of the proposed structural development. A geotechnical analysis recommended the stabilization materials be retained to protect the area from erosion during storm events. These recommendations conform to the Big Sur Coast Land Use Plan (BSC LUP) Hazards policies. The stabilized area includes a stone-lined drainage control system, a large putting green and smaller lawn areas, pathways, a bridge and small platform and landscaping with invasive non-native pride of madeira and nonnative succulents. The stabilized area is within 100 feet of environmentally sensitive habitat area (ESHA) located on the neighboring property to the north. A biological report concluded that the stabilized area was previously occupied by vegetation not considered ESHA and a large pine tree was downed by a storm prior to the unpermitted development on slopes. The biologist recommended that the invasive plants be removed from the site and the rest of the parcel.

Planning staff found the 2,500 square foot golf putting green installed at the side of the lower end of the installed drainage system to be inconsistent with development policies of the BSC LUP (Policy 5.4.2.6, restricting development of golf facilities, and BSC LUP Policy 3.3.2.7, controlling development adjacent to ESHA). Staff therefore recommend it be removed and restored with native vegetation. Staff also recommend a native tree be planted in the area to replace a tree downed by a storm that was removed and had previously screened the barn from view. Other areas in the drainage system can be permitted with a Coastal Development Permit (CDP) for development on slopes and a CDP for development within 100 feet of ESHA, given that a qualified engineer found it serves the

purpose to stabilize the slope effectively and removing it would cause more of an erosion hazard than keeping it in place, and a qualified biologist found it would not impact the ESHA on the neighboring parcel.

The property is located along Highway 1, Big Sur, and is subject to Critical Viewshed Policies of the BSC LUP (Policy 3.2.3.A). This BSC LUP policy directs staff to complete an objective determination of the visibility of proposed development following the Policies in Policy 3.2.3.B and for re-siting or redesigning development proposals, as needed, to conform with the Critical Viewshed policies. Policy 3.2.3.A.7 allows replacement or enlargement of existing structures within the critical viewshed to be permitted on the original location on the site, provided no other less visible portion of the site is acceptable to the property owner, and provided the replacement or enlargement does not increase the visibility of the structure and that the reconstruction and additions that are proposed must demonstrate an equivalent or reduced impact to the viewshed to be permitted. Staff conducted a preliminary visual impact assessment on December 9, 2025 and recommended a redesign. The Big Sur Coast LUAC reviewed this version of the development and influenced the design by also recommending revisions. The applicant later redesigned their proposed major remodel. The current design (**Attachment A**) proposes a remodeled residence that has an equivalent impact on the Critical Viewshed as the existing residence. Staff conducted a visual impact determination on May 12, 2026 and found the staking and flagging represented an equivalent height and bulk as the existing residence. Pursuant to the Critical Viewshed Policies of the BSC LUP, staff believes that the project can be supported as proposed.

DISCUSSION:

The project was reviewed for compliance with the resource protection policies in the BSC LUP and their implementing regulations in the Monterey County Coastal Implementing Plan (CIP) and the Zoning Ordinance (Title 20). This site has constraints in the form of visual resource protections, protection of environmentally sensitive habitat, and protection of slopes. The project site is within 750 feet of known archaeological resources, however, a Phase 1 Archaeological Assessment was prepared, which had a negative finding for this property (Susan Morley and Brenna Wheelis, February 2025, HCD-Planning Library Document No. LIB250123). Therefore, project entitlements include a Coastal Administrative Permit to allow development within 750 feet of known archaeological resources and County's standard condition has been applied, which requires that the applicant stop work within 50 meters and contact HCD-Planning and a qualified archaeologist if any previously unknown resources are uncovered during construction (Condition No. 3). The following subsections of this discussion review zoning and BSC LUP consistency and the constraints on the development at the site and, in all cases, find the development can be supported as proposed and conditioned.

The existing three bedroom residence is served by Victorine Ranch Mutual Water Company for potable water and an Onsite Wastewater Treatment System for wastewater. The Environmental Health Bureau reviewed the project and found that the water system will serve the project. No change to bedroom count is proposed, so the Environmental Health Bureau found there would be no increase to wastewater generation.

Zoning District Consistency

The Watershed and Scenic Conservation Residential (WSC) zoning district has the following structural setback minimums and height maximums: main dwellings 30 foot front setback, 20 foot side and rear

setback, and a 24 foot maximum height; accessory structures 50 foot front, 6 foot front half and 1 foot back half side, and 6 foot rear, and a 15 foot height maximum. Setbacks between main and accessory structures are 10 feet. The remodeled main dwelling will have a 126 front and 640 rear main setback and 70 foot nearest side setback. The project's accessory structures will have at least 126 foot front, 70 foot 8 inches side, more than 600 foot rear setbacks, and the relocated pool shed will be setback 15 feet from main dwelling, while the second shed will be attached to the existing garage. The maximum height of the proposed remodeled main dwelling would be 21 feet and accessory structures would be 11 feet for the storage shed attached to the garage and 6 feet for the relocated pool shed. All main and accessory structure setback and height development standards would be met.

The maximum allowable building site coverage is 10 percent (21,619 square feet), and the proposed coverage is 3.25 percent (7,029 square feet). This site coverage is below the required maximum. The minimum building site size in the WSC(40) zoning is 40 acres. The subject parcel is 4.96 acres in size and is legal nonconforming with this requirement.

Viewshed and Design Control

The existing dwelling and barn are visible from car windows when passing the property southbound and northbound on Highway 1. Note that visibility is considered in terms of normal, unaided vision in any direction for any amount of time during any season. This project location is subject to BSC LUP's strict Critical Viewshed policies (Key Policy 3.2.1 and Critical Viewshed Policy 3.2.3). Key Scenic Resources Policy 3.2.1 prohibits all public and private development in the Big Sur Critical Viewshed, which includes everything within sight of Highway 1. Overall, the project proposes a major remodel of an existing residence, and the applicant has redesigned the project to reduce potential views of the structure to the same as the existing condition. The barn is currently the most visible structure on the site, and no changes to the barn are proposed.

The applicant's first proposal for the major remodel to the main residence had more potential to negatively impact the Critical Viewshed, and, after redesign consistent with LUP Policy 3.2.3.A.7 (Replacement and Enlargement of Existing Structures), the subsequent design is substantially places the additions behind the existing roofline and thus is more consistent with the Key Policies. Pursuant to BSC LUP Policy 3.2.3.A.8, the project includes the expansion of a scenic and conservation easement established at the time of the lot's formation (July 22, 1983 with Volume 15 Parcel Map page 157) to cover the lower undeveloped portion of the lot and the area proposed for restoration (Condition No. 5).

The additions were staked and flagged in accordance with LUP Policy 3.2.3.B.1. The planner conducted site visits on December 9, 2025 and May 12, 2026 to review the visual character of the site and the proposed project. The first design had visibility from Highway 1. This "objective determination" is in the context that the structural development is about a 45-degree angle up a slope within ravines that would require a deliberate and awkward look to locate them in the public viewshed. Objectively, the likelihood that someone would spot the existing residence while driving along this curved section of Highway 1 is small, in the inspecting staff's opinion. However, the Key Critical Viewshed Policy prohibits any new structure from being visible. Thus, if they did, the viewer would observe that the original proposal's roofline would have been visibly higher than the existing roofline, bulk added to the visible portion of the dwelling would have increased, and generally the main dwelling

would have been more visible. Accordingly, staff recommended a redesign prior to a final viewshed determination. The applicant subsequently redesigned and resubmitted the application. **Exhibit D** includes site visit photographs.

For the traveling viewer going from north to south and the proposed project, the existing residence is visible along Hwy 1 when directly alongside the ravine below the residence for approximately one second while traveling southbound at the posted speed. The barn, which is not proposed to be part of this project, is most prominent. Although there is no ridgeline effect, the barn is in the viewshed. The revised staking and flagging, as viewed on May 12th (after redesign), was visible slightly above the existing roofline. There was no ridgeline effect.

Similarly, the existing residence is visible along Hwy 1 when directly alongside the ravine below the residence for approximately one second while traveling northbound at the posted speed. The barn, which is not proposed to be part of this project, is most prominent. Driving south to north, the south side of the existing residence is visible as a dark mass without ridgeline effect at the top of the next ravine south for less than a second while traveling northbound at the posted speed. Although that side of the project is staked and flagged, the flags were not visible from one ravine south of the project on Highway 1.

The visual impact determination (May 12, 2026) concluded that the existing development is within the Critical Viewshed. The main residence is partially within the Critical Viewshed from limited sections of Hwy 1, but not visually prominent and does not create a ridgeline effect. The existing residence is sited approximately 640 feet from the property line closest to Highway 1 and is visible from Highway 1 when directly alongside the ravine below the residence for approximately one second while traveling by car at the posted speed. This section of Highway 1 lacks space for walkers. Given the change in elevations between the residence and Highway 1 and the viewing angle (approximately 45%), the residence is not directly in a driver's or passenger's line of sight. Even so, the applicant made efforts between the first plan submittal in 2024 to today to reduce the visibility of the proposed development. The main residence's height was reduced by three feet, proposed second floor additions were resited over 80 feet back from the façade on the north, and an addition to the front was moved to the south side due to concerns that the development could be in the Critical Viewshed. Colors and materials for the project were updated from off-white body to include beige board formed concrete body and stone veneer in brown and beige colors, light brown painted cedar trim and bronze aluminum doors and windows to better blend into the Critical Viewshed.

In recent history, a large tree was downed by a storm at the lower end of the slope below the barn. The owner had the downed tree removed and installed a 2,500 square foot putting green in the approximate area. Had the tree been replaced, visibility of the barn would be less than it currently is. Historical Google Earth imagery from before 2020 shows a tree that had a full canopy approximately 200 feet downhill of the barn.

Tree removal is governed by BSC LUP Policy 5.4.2.13 and regulated by CIP section 20.145.060. If a dead/downed tree must be removed to reduce unsafe fuel accumulation adjacent to an existing occupied structure, it can be removed without a Coastal Development Permit. If a downed tree is outside the 100-foot fire management zone and has no likelihood of threatening the safety of the

dwelling, owners are encouraged to leave it in place as habitat (CIP Attachment 1, section D.2.d). In this case, the downed tree was removed.

Key Policy 3.2.1 states the objective to preserve scenic resources in perpetuity and promote the restoration of the natural beauty of visually degraded areas wherever possible. The purpose of the WSC zoning district is to allow only such development that can be achieved without adverse effect, and which will be subordinate to the resources of the particular site and area (Title 20 section 20.17.010). As the downed tree was removed, replanting in approximately the same location aligns with Key Policy 3.2.1 and the WSC zoning district. Therefore, the owner has agreed to replant at least one Monterey Pine or Monterey Cypress sapling downhill of the barn in the approximate location where the fallen tree had been. Condition No. 4 describes the replanting requirements. With this restoration to the previous site condition, the residential use of the parcel shall be subordinate to the resources of the site, and restore the natural beauty of the site.

CIP section 20.145.030.A.2.h requires a condition of approval for development on properties in the Critical Viewshed to grant a scenic easement to the County over vegetated portions of the parcel without which the development would be located within the Critical Viewshed. Condition No. 5 is applied to implement this regulation, expanding the existing scenic easement area to include the replanted tree and other naturally vegetated areas.

After-the-fact Development on Slopes

The BSC LUP and CIP prohibit development on slopes in excess of 30 percent unless a Coastal Development Permit is obtained and the appropriate hearing body finds that there is no alternative that would allow development to occur on slopes less than 30 percent or that the proposed development better achieves the resource protection objectives and policies of the LUP. When the planner made an initial site inspection on January 8, 2025, they encountered to the north of the main residence a large area of hillside stabilization with terracing, stone-lined drainage and swale, and a 2,500 square foot golf putting green on the upper elevation of the north side of the subject lot approximately 75 feet to the north of the residence. County GIS spatial data indicated that the area had largely been naturally sloped in excess of 25 percent. Therefore, the planner requested a geotechnical investigation of the area and a grading and drainage control plan set with as-built analysis (**Exhibit E**).

The engineer who performed an as-built review of the development on slopes did not recommend that any of it be removed or reinstalled. Soil erosion is a hazard recognized by the BSC LUP, and the CIP includes recommendations for stabilization. BSC LUP Key Policy 3.7.1 states that land use and development shall be carefully regulated through the best available planning practices in order to minimize risk to life and property and damage the natural environment. If the improvements were removed, there would be an erosion hazard; HCD staff (Environmental Services) found it is likely that the stormwater issue would return without installation of a similar drainage control design. In conformance with BSC LUP Hazards Key Policy 3.7.1, by granting the permit for the after-the-fact development on slopes, the risk to life and property and damage to the environment is minimized.

The project site plan includes green color where there are currently slopes in excess of 30 percent. Based on the materials provided, staff estimates the drainage control system and associated terracing amount to approximately 7,640 square feet of non-structural development on natural slopes greater

than 30 percent. However, the 2,500 square foot golf putting green installed at the lower northeast of the stabilized area is inconsistent with the development policies of the BSC LUP. Policy 5.4.2.6 and CIP section 20.145.140.3.a specifically name golf as an inappropriate development for the setting. The golf putting green is also within 100 feet of ESHA on the neighboring property to the north, as discussed below. Staff therefore recommend it be removed and recontoured and restored with native vegetation, following a restoration plan prepared by a qualified biologist/ecologist (Condition No. 4).

Biological Resources and ESHA on neighboring parcel

The biological report (Rob Thompson, July 24, 2025, HCD-Planning Library Document No. LIB250287) stated that the area that was cleared of vegetation to install the stone-lined drainage and swale on the north side of the parcel was mixed nonnative invasive plants and common types of native coastal scrub flora. Based on an assessment of the open areas within the parcel, the biologist presumed the vegetation that was removed was poison oak (*Toxicodendron diversilobum*), coyote brush (*Baccharis pilularis*), sticky monkey flower (*Mimulus aurantiacus*), and California sagebrush (*Artemisia californica*), as well as exotic species, such as ice plant (*Carpobrotus edulis*), pride-of-madeira (*Echium candicans*), French broom (*Genista monspessulana*) and jubata grass (*Cortaderia jubata*). The biological report did not find ESHA directly impacted by the development, but found maritime chaparral and coastal scrub/sagebrush scrub habitat on the next property to the north. It is reasonable to assume that a portion of undisturbed coastal scrub habitat was removed with the initial construction of the residence in 1998. Removal in the immediate area of the drainage control system was associated with the installation of what appears in historic Google imagery to be an open water trough(?), pathways, and nonnative landscaping.

In 1999, a permit was granted for the widening of the access road which passed through the subject parcel at the time. A biological report was prepared for the project (Jud Vandever and Associates, November 1999) that concluded there were no rare or endangered plants or animals on the parcel; the 1999 report recommended “invasive weed abatement” which was made a condition of approval of the Coastal Development Permit (Planning Commission Resolution No. 00045, PLN990377).

The Thompson (2025) biological report was not specific as to the distance the drainage control system and golf putting green are from the ESHA on the neighboring lot, so staff conservatively assume it to be within 100 feet (**Exhibit D**, Site Photographs). Development within 100 feet of ESHA is non-exempt development requiring a Coastal Development Permit. BSC LUP Policy 3.3.2.7 states that land uses adjacent to ESHA be compatible with the long-term maintenance of these resources, including incorporating all site planning and design features needed to prevent significant habitat impacts. The project biologist concluded that the development of the drainage control system and golf putting green had not impacted the ESHA on the neighboring parcel. However, the golf putting green is not compatible with the proximity of the resource. Condition No. 4 requires the golf putting green to be restored and for native plants to be planted in the disturbed areas that are within 100 feet of ESHA, ensuring the project is consistent with this policy.

BSC LUP Policy 3.3.3.A.10 states, “County encourages residents and public agencies to undertake restoration of Big Sur’s natural environment by removal of exotic plants such as Scotch and French Broom, Eucalyptus, Kikuyu grass, Vinca, Pampas grass, Gorse, and other non-native invasive species, providing such removal does not increase potential erosion problems.” In conformance with this policy

and the recommendation of the project Biologist, the project includes the removal of the non-native plants and restoration of coastal scrub and other site-appropriate native plants on an area of approximately 12,500 square feet that is in a condition of bare earth or invasive non-native cover (Condition No. 4).

CEQA:

The project qualifies for Class 1, 2, and 33 Categorical Exemptions pursuant to CEQA Guidelines sections 15301, 15302 and 15333. CEQA Guidelines section 15301, Existing Facilities, categorically exempts the permitting of existing facilities. The project qualifies for a Class 1 exemption because the existing drainage control facility was installed in 2022, prior to acquiring a permit. CEQA Guidelines section 15302, Replacement or Reconstruction of Existing Facilities, exempts the demolition and remodeling of single family residential dwellings where additional impacts associated with the replacement are negligible. The site development would go from being a residence with associated development including a barn, two driveways and onsite wastewater treatment system (OWTS), and previously graded natural slopes of 30 percent to an 77 percent larger single family residence (3,107 square feet of living space to 7,071 square feet) with a barn, two car garage, OWTS, after-the-fact permitting of grading on slopes and partial restoration, driveway to the barn and a reconfiguration of the main driveway. The primary and accessory uses of the site will remain the same after the project. Therefore, the rebuild is consistent with the intent of the Class 2 exemption reconstruction. CEQA Guidelines section 15333, Small Habitat Restoration Projects, exempts projects not to exceed 5 acres in size to assure the maintenance, restoration, enhancement, or protection of habitat for fish, plants, or wildlife. With an after-the-fact permit for development on slopes, the project conforms with the intent of the BSC LUP (Key Policy 3.7.1). With recontouring and revegetation of a 2,500-square-foot area that was part of unpermitted development on slopes, the project conforms with Title 20. Other areas previously disturbed around the drainage control system (approximately 12,500 square feet) will be planted with native species best suited to location. The total area is 0.34 acres, which is less than 5 acres. No listed species shall be harmed in the restoration of the area, which will follow a qualified biologist's recommendations. The activity required to restore that area meets the definition of a Class 33 exemption.

None of the exceptions from CEQA Guidelines 15300.2 apply to the project

The project is located in an area where residential use is primary pursuant to the zoning code and the current buildout of the neighborhood. The site of construction is not within an environmental resource of hazardous or critical concern that has been designated by a local, state, or federal agency and precisely mapped. The proposed land use is not being altered and there is a negligible expansion of existing use, and there are no potentially significant impacts associated with the project; therefore, the project would not cause or contribute to a cumulative environmental impact. There are no unusual circumstances associated with the undertaking of the project that would create the reasonable possibility for a potentially significant environmental effect. The project is in view of Highway 1, a designated state Scenic Highway. However, as detailed in the discussion, the project would not adversely affect scenic resources in view of the scenic highway. The project is not located on a hazardous waste site included on any list compiled by Section 65962.5 of the Government Code. The existing residence was constructed in 1998 and is not a historical resource. Thus, the project's demolition does not impact any historical resources.

OTHER DEPARTMENT/AGENCY INVOLVEMENT:

The following County agencies or departments reviewed this project:

Environmental Health Bureau
HCD-Engineering Services
HCD-Environmental Services
California Coastal Commission

LUAC REVIEW:

The project was referred to the Big Sur Land Use Advisory Committee (LUAC) for review and recommendation in accordance with Board of Supervisors Resolution No. 15-103, as it involves a design approval subject to a public hearing. The Big Sur Coast Land Use Advisory Committee (LUAC) influenced the redesign of the project, as well. The LUAC attended the December 9, 2025, site visit with staff. During LUAC first public hearing review of the project (after site visit), the LUAC recommended a redesign to lessen the height of the main dwelling additions to avoid viewshed impacts from Highway 1 below the project site. Staff and LUAC members also noted that there was no ridgeline development proposed at that time, only a potential expansion of structure in the Critical Viewshed. The LUAC also requested that the proposed off-white body color be darkened to a natural color to replace the existing grey-brown body. Following this, the project plans were revised, and new staking and flagging was installed. The Big Sur Coast LUAC reviewed the updated design, colors, and materials in a meeting on May 26th and unanimously recommended the Planning Commission approve the proposed project (4 ayes, 0 noes, 1 absent).

Prepared by: Mary Israel, Supervising Planner x5183

Reviewed by: Fionna Jensen, Principal Planner

Approved by: Melanie Beretti, AICP, Chief of Planning

The following attachments are on file with the HCD:

Exhibit A - Draft Resolution, including:

- Recommended Condition of Approval
- Site Plans, Floor Plans, Elevations, and Colors and Materials

Exhibit B - Big Sur LUAC Meeting Minutes for January 9, 2026, and May 26, 2026

Exhibit C - Vicinity Map

Exhibit D - Site Photos

Exhibit E - Geotechnical As-built review and drainage plan sheets

Exhibit F - Biological Report (LIB240077)

cc: Front Counter Copy; HCD-Engineering Services; HCD-Environmental Services; Environmental Health Bureau; Mary Israel, Supervising Planner; Fionna Jensen, Principal Planner; Jeffrey Tedford, Applicant; Jun Sillano, Agent; Anthony Lombardo, Agent; The Open Monterey Project (Molly Erickson); Christina McGinnis, Keep Big Sur Wild; Landwatch; Lozeau Drury LLP; Project File PLN220053.