

Exhibit G

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A PROFESSIONAL CORPORATION

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July 6, 2026

Our File No: 1599.001

Paul Getzelman, Chair
Monterey County Planning Commission
1441 Schilling Place
South 2nd Floor
Salinas, CA 93901

RE: Mehdipour/PLN250292

Dear Chair Getzelman and Members of the Planning Commission:

We represent Mr. and Mrs. Reeves, the homeowners immediately to the south and nearest Ms. Mehdipour's project which includes an accessory dwelling unit (ADU). They have reviewed the plans for the project and the Board's prior approval for the Mehdipour house (Board Resolution 25-132). There are numerous issues with the staff report and staff recommendation including that the project violates two conditions from the previous County approvals. One is a condition of a previous permit to replace illegally removed landmark cypress trees and, the second, is a condition of approval on the permit for the replacement of the demolished historic Connell House regarding coverage. As a result, the Reeves request that you do not approve the project.

The Reeves want to be clear. They would not object to a project such as is proposed, including an ADU or junior ADU as provided in state law, as long as it is consistent with the Board of Supervisors' prior approvals and conditions. The project, as proposed, does not.

There are numerous errors and omissions in the staff report, as are discussed herein:

THE PUBLIC NOTICE AND STAFF REPORT DO NOT DESCRIBE THE WHOLE PROJECT

The staff report and public notice are written as if the 798 SF ADU is the whole of the project. It is not.

Neither the staff report nor the public notice discloses that the whole of the project is a two-story structure, thirty feet in height. The building footprint measures, per the project plans, 33' x 27'6". Each level is 907.5 SF for a total of 1,815 SF. The ADU, which is 907.5 SF, not 798 SF as stated in the public notice and the staff report, is the upper story. The lower story appears to be for storage. The "structural connection" between the proposed project and the previously approved house is a pergola. Given the omissions, the notice did not provide adequate information to the public.

The staff report has these same omissions making the report inadequate to fully inform the Commission on the project as a whole.

The July 8th hearing should be reset for a later date so an adequate public notice describing the whole of the project can be given and a staff report addressing the whole of the project can be prepared.

THE STAFF REPORT INCORRECTLY DESCRIBES THE STATUS OF THE BUILDING PERMIT FOR THE MAIN HOUSE

The report states the applicant is “*currently in the process of applying for construction permits (25CP04088)*.” The applicant is not “in the process of applying” for the building permit for the house approved by the Board. The application was filed in December 2025. There have been four sets of corrections and revisions. The County’s review of the application is complete. All County departments and the fire department have approved the permit to be issued. Final approval by the Monterey Peninsula Water Management District is pending. Given that there is an existing meter and water is secured through the Pebble Beach Company, District approval largely a given.

The building permit could be issued and construction started within the next few days.

THE STAFF REPORT DOES NOT PRESENT THE POSITION OF THE COASTAL COMMISSION

Finding 2, Evidence (a) of the draft resolution prepared and recommended by the staff states “The project has been reviewed for site suitability by the following departments and agencies: HCD- Planning, Pebble Beach Community Services District, HCD- Engineering Services, HCD- Environmental Services, Environmental Health Bureau, and *the California Coastal Commission. There has been no indication from these departments/agencies that the site is not suitable for the proposed development.*”

In a letter from the HCD to the applicant dated December 13, 2025, staff wrote advising her the application was incomplete. That letter included the following language from the California Coastal Commission staff: “*Ensure that any development at the site (including any new ADU, driveway area, or paths) does not increase site development coverage beyond the area already approved by the County.*”

In an email dated July 6, 2026, Coastal Commission District Supervisor Katie Butler confirmed that the statement from December is still the Coastal Commission staff’s position.

THE LIMIT ON IMPERVIOUS COVERAGE IS APPLICABLE TO ANY AND ALL DEVELOPMENT ON THE PROPERTY

The staff report (page 7) states: “In regard to the previous decision from BOS, staff’s understanding of this decision considered only the development of the single-family dwelling

and an attached two-car garage, and did not contemplate or preclude future development of accessory structures, such as an ADU or guesthouse. The Board's decision limited the footprint of the replacement residence (PLN100338 and PLN240077) to the existing development footprint from the previous residence, the Connell House." We disagree. There is no evidence in the record to support the staff conclusion.

The demolition of the Connell House was approved by the Board of Supervisors (PLN 100338), following preparation of an EIR, subject to the 43 conditions affecting the entire property. While the necessity of an EIR was triggered by the proposed demolition of a significant historic resource, the EIR assessed development of the entire property in light of not only the historic resource but also the ESHA, archaeological resources and visual resources of the property. The Board decision was based on that analysis.

The entirety of the property, as is most of the Signal Hill area, is environmentally sensitive habitat (ESHA). Policy 14 of the Del Monte Forest LCP states: "Near environmentally sensitive habitat areas, native vegetation removal and land disturbance (grading, excavation, paving, etc.) shall be restricted to the minimum amount necessary to accommodate reasonable development

In approving the replacement house (PLN240077), which was an extension of the approval of the demolition of the Connell House, the Board of Supervisors incorporated all of the previous conditions of PLN100338 and added 11 additional conditions in PLN240077. The Board added specific language to Condition 11 of PLN240077 that: "Other than the proposed driveway, **any impervious surfaces extending beyond the footprint of the former Connell House are not permitted**" thereby allowing reasonable development consistent with policy 14. The Board Resolution is clear that the condition applies to **any** impervious surface without limitation. There is no exception, written or implied, to conclude otherwise.

The plans were reviewed by Eric Miller (Exhibit A). The analysis clearly shows the inconsistency of the proposed project with the Board's approval.

- The area outlined by red dashes is the footprint of the Connell House as agreed to and approved by the Board of Supervisors.
- The area highlighted in yellow is additional impervious surface proposed in the building permit application submitted in December 2025.
- The area in blue cross hatch is the proposed ADU.



EXHIBIT A

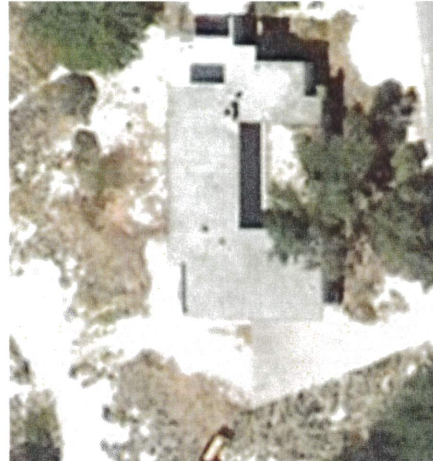
The staff report (page 4-5) states: “The replanting [of the trees to replace trees illegally removed] has yet to be successful as the tree has been replanted 2-3 times due to wind exposure and soil conditions that led to a fungal pathogen. However, the arborist has confirmed that the soil conditions are no longer a reason for survivability, but wind exposure does continue to limit appropriate relocation sites.”

The Board also reviewed as part of PLN240077 the proposed removal of a cypress tree which was one of three planted, and is the only remaining one of the three, as restoration for the cypress trees illegally removed in 2010 (PLN100418; February 5, 2013). The other two trees were to be

planted to the rear of the Connell House to replicate the screening prior to the illegal removal are the trees which reportedly were damaged by fungus. The following pictures show the before and after of the tree removal. The tree in question is the only surviving tree.

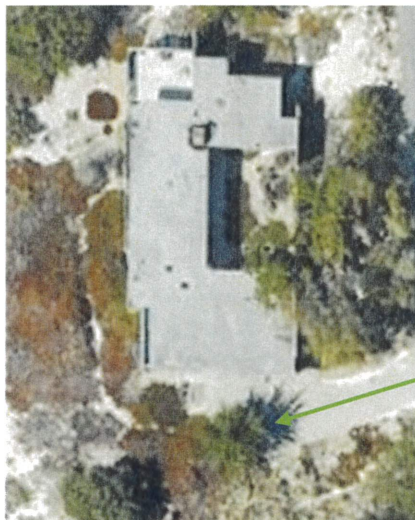


Google Earth April, 9, 2009



Google Earth September 30, 2009

This picture (September 30, 2022) shows the same tree just prior to the final demolition of the Connell House. Exhibit B (following) shows the current condition of the tree in question. Clearly, the tree is thriving. The Bolden 2024 report describes the trees condition as “good.”



Subject Tree

The Board found (PLN 240077, Finding 1, Evidence i)

The proposed project that was appealed to the Board of Supervisors requested removal of a third Monterey Cypress tree, but it was identified as part of a previous Coastal Development Permit and Restoration Plan (Resolution No. 13-021 for PLN100418). The Board does not find evidence to require that the Cypress tree near the existing driveway

that was required to be replanted under prior permits must now be relocated. Therefore, the **Applicant has agreed** that this tree shall be protected...

The plans for the project however tell a different story. The staking photo and plans clearly shows the tree that the applicant promised to protect is in the footprint of the project and to be relocated (Exhibits B and C).



Exhibit B

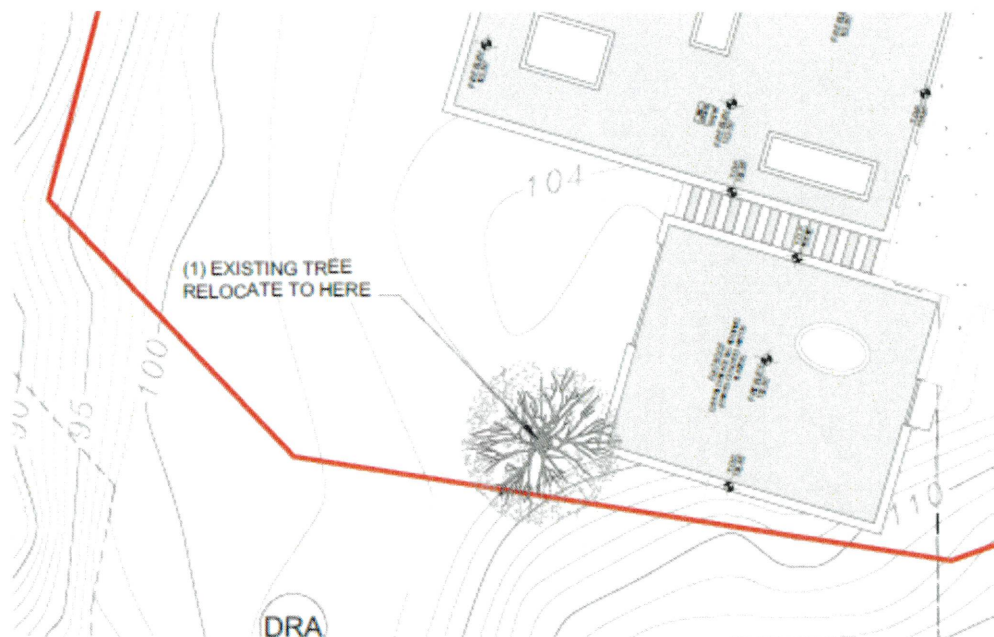


Exhibit C

THERE IS NO CONSERVATION AND SCENIC EASEMENT ON THE PROPERTY

The staff report states (page 5): “As required by Board of Supervisors Resolutions No. 23-237 and 25- 334 (HCD-Planning File Nos. PLN100338 and PLN240077), the project site already contains a Conservation and Scenic Easement (CSE) over those portions of the property that contain ESHA, including all remnant native sand dune and restored habitat.”

That is incorrect.

The applicant has submitted a CSE which has been approved by staff and County Counsel. As of July 1, the staff is awaiting a signature from the applicant accepting additional changes to the CSE. Once that occurs, the CSE must then be accepted by the Board of Supervisors as an agenda item in a public session. The Board could either accept the CSE or may request further changes. Until the Board accepts the CSE and the CSE is recorded, it is not final and does not exist.

DEVELOPMENT ON 30% SLOPES IS NOT JUSTIFIED.

The staff report (Page 6) states: “The project involves 260 square feet of development on slopes in excess of 30%. The suitable area for an ADU is limited due to the existing CSE encumbering most of the undisturbed areas of the property. Any other location of an 800-square-foot ADU would either impact forest resources, be more visually prominent from 17 Mile Drive, or require additional development on slopes. Given the site’s constraints, staff believes the proposed location balances the requirements of the DMF LUP by minimizing disturbance to natural landforms, minimizing tree removal, avoiding ESHA, and minimizing visual impacts.”

As discussed above, there is no CSE on the property and there is no surety that the configuration currently proposed (See Exhibit A) will be approved. Should additional impervious coverage be allowed, there would be ample room in the area already cleared of resources for the demolition of the remainder of the Connell House to accommodate an ADU, but not necessarily the project at hand. It would seem to be preferable to design a project within this area than to go further into the remaining dune habitat as currently proposed.



ADDITIONAL CEQA REVIEW IS REQUIRED

Neither the staff report nor the proposed resolution are adequate to support a conclusion that the project as a whole is categorically exempt because neither the staff report nor proposed resolution describe the project as a whole. The project, as previously described in this letter, is much larger than a 798 SF ADU. Any environmental assessment which does not address the potential impacts of the project, as a whole as required by CEQA, is inadequate.

The Board of Supervisors approved demolition of the Connell House (PLN100338), a significant historic resource listed on both the State and Federal registers, subject to a subsequent design approval (PLN240077). That approval (PLN100338) is very specific in its choice and implementation of FEIR Alternative 6. The approval limits development to the Connell House's "historic footprint." That limitation is specifically shown in the plans approved by the Board and in the Board's very findings regarding the size and location of the development to be allowed. The proposed project is inconsistent with the Board's direction (Resolution 23-237 and Resolution 25-132) for the location and size of the allowable development on the site.

At the Del Monte Forest LUAC meeting HCD staff, when questioned by the LUAC members about the inconsistency of the proposed project and the prior Board of Supervisors conditions of approval, stated they could not advise the LUAC on what the intention of the Board of Supervisors was. According to the staff report, they now believe they know the Board's intent.

The LUAC was confused by the staff opinion that the LUAC could not deny the application. Their only option was to approve the project but could recommend conditions to improve the project. As a result, the LUAC recommendation was to “Support Project with changes. Approval with contingencies consistent w/ Board of Supervisors conditions and verification of compliance with those conditions.” As discussed, the project does not comply with the Board’s decision and therefore does not have LUAC approval.

The Board’s intent is clearly reflected in numerous findings in Board Resolution 25-132 (PLN240077). For example:

On June 27, 2023, the Board approved a Combined Development Permit for the “Reduced Project” (Alternative 6 of the Final EIR), in concept, as there were no plans prepared for it to be reviewed at the hearing...The Board’s motion adopting its decision included the “stipulation that the construction is in the footprint of the Connell House as it was” (Board of Supervisors Resolution 25-132, Finding 1, Evidence d).

The Final EIR describes its Reduced Project Alternative 6 as subject to these constraints: reduce the size of the proposed single-family residence to stay within the existing developed footprint and to avoid building heights that extend above the ridgeline (EIR Chapter 5, page 5-9). In approving the Coastal Administrative Permit to construct a residence, the Board directed “that the construction is in the footprint of the Connell House as it was” (Board of Supervisors Resolution 25-132, Finding 1, Evidence m).

In approving the Reduced Project concept (Resolution No. 23-237), the Board of Supervisors prohibited the replacement single-family dwelling from expanding beyond the building footprint of the previous dwelling. The plans attached to this Resolution, inclusive of roofs, decks, and hardscapes, do not expand beyond the Connell House’s historic footprint and it is designed at a height that does not constitute ridgeline development (Board of Supervisors Resolution 25-132, Finding 1, Evidence f).

The specific size and siting of the allowable development on the Mehdipour property was thoroughly discussed. As stated in multiple findings of the Board of Supervisors’ Resolutions 23-236 and 25-132, the approval of PLN100338 and PLN240077 carries out and implements FEIR Alternative 6 and allows reasonable development of the property.

The two-story house approved by the Board was 7,690 SF. The project at hand (Exhibit D) totals 1,815 SF which would increase the total square footage to 9,505 SF, a 24% increase over that approved by the Board.

The Planning Commission earlier approved (PLN24007/Resolution 25-012) an 8,290 SF house which the Board subsequently reduced to 7,690 SF. The proposed project would be 9,505 SF, 1,215 SF, 15% larger than that approved by the Planning Commission.

These are changes which significantly expand the development area beyond the Board's approval and must be evaluated in light of FEIR Alternative 6 and CEQA in general. The County would then have to amend or augment the FEIR by an addendum, supplement to the FEIR or a subsequent EIR based on the County's assessment of the potential significant environmental impacts of the overall project changes.

EXHIBIT D



ADU: 33'x32'6" ...1,072.5 SF
Two Story, 30' high, 2,145 SF, total

DEL MONTE FOREST LCP AND THE COASTAL ACT

The State law and County ordinance are clear the Coastal Act takes precedent over other State and local regulations, including regulations for ADUs. The staff of the Coastal Commission wrote: "the Coastal Commission or the local government will need to analyze the consistency of a proposed ADU project with policies that require new development to minimize risks from coastal hazards [and] protect sensitive habitat... (Summary of State ADU Law and the Coastal Act, California Coastal Commission, 2025)."

LUP Policy 17 requires that the remnant native sand dune habitat ...on Signal Hill near the former Spyglass Quarry...be preserved through open space CSE [conservation and scenic easement deed] conveyed to the Del Monte Forest Foundation. (Board of Supervisors Resolution 25-132, Finding 1, Evidence k). The Board of Supervisors did allow a large area to be omitted from the CSED. It is unlikely that much of the area proposed to be exempted from the CSED is

also where the applicant now proposes to build a 24% addition to the total square footage of the plan approved by the Board is a coincidence.

The final configuration of that omitted area has not yet been approved by the Board. That area should be required to be consistent with the limitations placed on neighboring homes requiring everything outside the footprint to be placed in a scenic easement (Exhibit E).

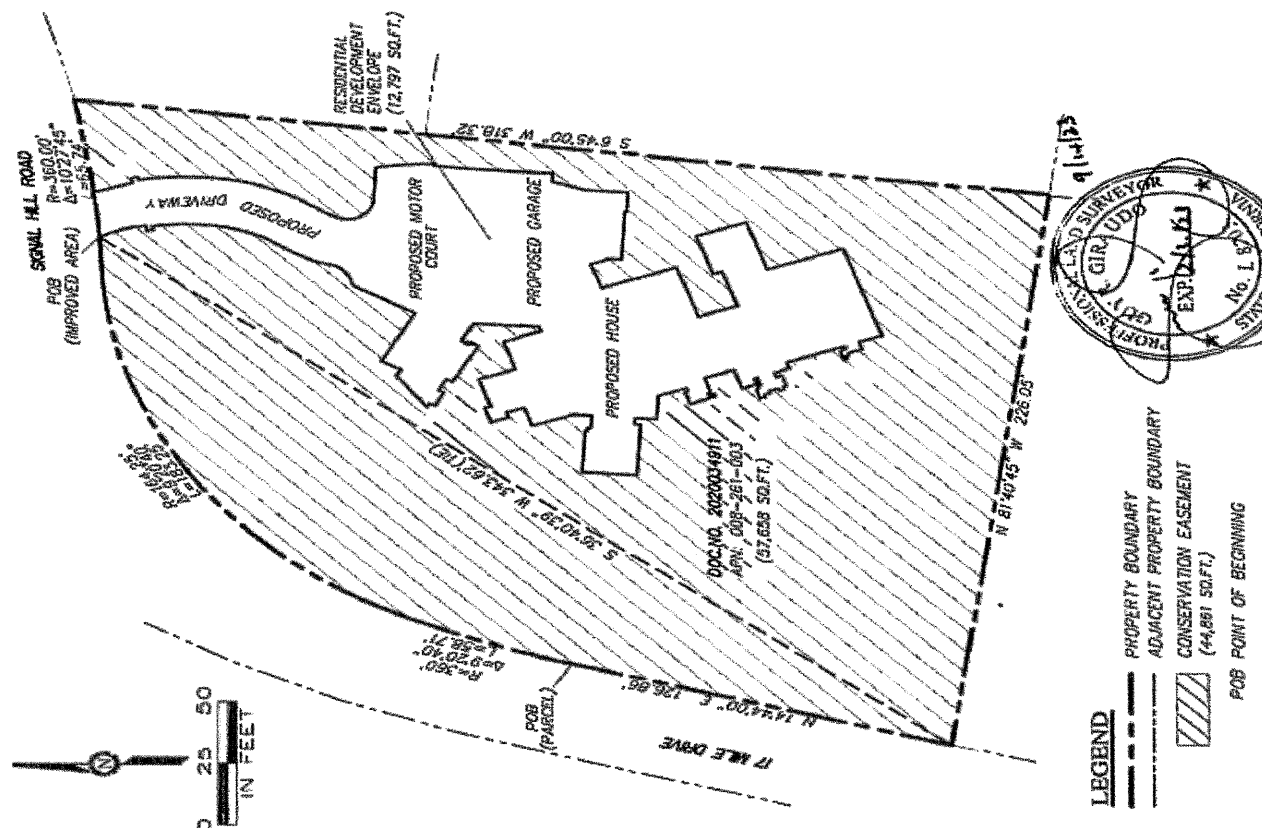


EXHIBIT E

The Coastal Commission staff wrote to HCD staff that “the County must ensure that any development at the site (including any new ADU, driveway area, or paths) does not increase site development coverage beyond the area already approved by the County.” It is clear based on the ADU plan set and even more so in the building permit plan the goal is to increase the site development beyond that which was approved by the Board.

SUMMARY

It is clear the applicant continues to attempt to increase the size of the project by any conceivable means. The total project is now 24% larger than the project approved by the Board. It is inconsistent with the conditions and findings adopted by the Board, with the applicant’s agreement, for the after the fact house. It is inconsistent with the Del Monte Forest Land Use Plan and the Coastal Act. It is even larger than the original replacement house denied by the

Board of Supervisors. Any project not in keeping with FEIR Alternative 6 and the Board of Supervisors prior approval must be denied.

Given the facts of this matter, including inadequate public notice, it appears the Planning Commission has two options:

1. Set a public hearing for a future date with direction to staff to provide new notice adequately describing the project as a whole and to provide the Commission with a new staff report and associated documents addressing the project as a whole; or,
2. Refer the entire application to the Board for a decision on the project as a whole since the project depends on developing beyond the limits previously approved by the Board.

Sincerely,



Dale Ellis
Director of Planning and Permit Services

cc: Client
Katie Butler, California Coastal Commission
Craig Spencer, HCD Director
Melanie Beretti, Chief of Planning
Jacquelyn Nickerson, Principal Planner
McKenna Bowling, Associate Planner
Members of the Board of Supervisors