

To: Carl Holm, Assistant Director, Monterey County Planning DEpartment  
Fax: (831) 757-9516  
From: Margaret Robbins  
Subject: DEIR for GPU 5

Attached are my comments (18 pages) on the DEIR for GPU 5. The sections covered are: Culteral Resources, Population and Housing, Hazards and Hazardous Materials, Transportation, Carmel Valley Master Plan Supplemental Policies, and Executive Summary.

*M. Margaret Robbins*  
Margaret Robbins, CVA Board Member  
January 31, 2009

Please e-mail me at [margaretmike@aol.com](mailto:margaretmike@aol.com) so I know that you have received this fax.

*Total pages including this cover page: 18*

Monterey County  
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**Cultural Resources 4.10, Abstract 4.10.1**

Paragraphs two and three. Please explain in detail why all potential impacts from development and land use activities contemplated by the 2007 General Plan and all potential cultural resource impacts for implementation of the proposed Agricultural Winery Corridor Plan would be less than significant and not require mitigation. For example, Exhibit 4.10.2 Archaeological Sensitivity shows Carmel Valley Village to rate high in sensitivity, yet The 2007 General Plan proposes that Gardner Tennis Ranch along side the Carmel River be designated as a "special treatment area". Please define in detail what a "special treatment area" is and exactly how it will be handled by the Planning and Building Department.

1

In addition, page 4.10.6, Esselen. This paragraph lists two Esselen triplets: Fixcelen (Carmel Valley) and Tucutnut (Carmel River) where the 2007 General Plan lists Rancho Canada Village with being developed under a specific plan. Please list the records used and the sources consulted with that allow a sweeping statement such as the one in the first sentence.

2

Public Service Element, page 4.10-2. By reference PS-12.2 and PS-12.4 by please how encouraging, but not requiring, private property owners to submit applications for appropriate properties to either the state or nation register will ensure awareness of existing historic resources and their locations.

3

The various policies referenced in the balance of page 4.10.12: Please explain exactly who will be responsible for ensuring that these policies will be met and explain how the words "encourage" and "promote" will accomplish compliance.

4

Please explain in detail why Gardner's Tennis Ranch, a "special treatment area" in Carmel Valley is not defined and outlined the same way as "Paraiso Hot Spings on Page 4.10.15.

5

Page 4.10.16 Please explain why no mitigation measures beyond CUL-1 are needed to preserve historic resources when the policies referenced above are not enforceable.

6

Page 4.10.17. Open Space and conservation easement Element, last paragraph: Who is responsible for "establishing procedures, educating the public" to identify sensitive areas? When will the County adopt a uniform set of guidelines for data recovery programs and who is responsible for monitoring these guidelines and who is responsible for providing the funding needed? Please explain in detail.

7

Page 4.10.20 Significance Determination. Relating to buildout and the preservation of archeological resources. "Assuming these (the rather toothless policies in the General Plan) or more stringent requirement remain in place" ...archeological resources would not be significantly impacted. The writer

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seems to assume that more stringent requirements will not be put in place.  
Please explain in detail why no mitigation measures beyond CUL-1 is needed.

8

Paleontological Resources, page 4.10.21 Please explain in detail where the funding  
will be secured to establish procedures, identify and map resources? Who is  
responsible for monitoring the polocoos?

9

Page 4.10-25 Policy OS-8.5. When will a Native Californian Advisory Panel be  
formed and in place, a who will fund this efort, and who will be responsible for  
seeing that this panels recommendations are adopted and followed?

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(Note: See CV-3.13 for a really good policy. None of the policies I've referenced  
have any backbone)

2

**4.15 POPULATION AND HOUSING**

**Table 4.15.1, Table 4.15.2 and Table 4.15-3 Do these figures include or exclude the coastal zone? For each figure that excludes the coastal zone, please show the figure that is attributable to the coastal zone. Additionally for each figure that includes the coastal zone, please state the quantity that is attributable to the coastal zone. Please explain why the coastal zone was excluded from the DEIR analysis and explain exactly how the additional consideration of the coastal zone affects the impact analysis. Also, for each figure that excludes the coastal zone, please identify who instructed the EIR preparer to exclude the coastal zone and for what reason.**

11

**Page 4.15-1 Carmel Valley is listed as one of the County's five largest unincorporated areas. Please provide the population attributed to Carmel Valley and identify the area included and identify the source of this information. Does the area include exactly what is in the Carmel Valley Master Plan? If not, please explain in detail why not?**

12

**Page 4.15-2. In the first paragraph, please explain in detail why there is a discrepancy in the numbers shown?**

13

**Table 4.15-4. Please explain why only the population of Carmel Valley Village is included, identify who instructed the Eir preparer to do this and for what reason.**

14

**Page 4.15-7. Please explain how the county's housing strategy for 2008 will shift from "encouraging" to "producing" actual housing units of the right type in the right place to serve identified needs when the lack of produced units says otherwise. Please identify in detail the survey or facts that were gathered to indicate what the right kind of housing is and what is the right place. I am a member of the Housing Advisory Committee who volunteered to serve on a sub-committee to work with the ag and tourism employers to produce affordable housing for these two key industries. This sub-committee was appointed by the HAC in November of 2006 and has not had one meeting!**

15

**Page 4.15-7. Please define in detail "ability to accommodate growth" and "above market". Page 4.15-9 Please explain why "The Commons at Rogge Road" still includes 171 units when only the 46 rental units can be called affordable. The other 125 for sale units no longer have deed restrictions that were to keep them affordable for a period of time and basically these units can be sold at market rate whatever that figure may be.**

16

**Page 4.15.10 Please explain in detail what progress the County has made in meeting dwelling unit allocation targets. Please include the number of units actually built.**

17

**Page 4.15-16 Please state the facts that underly the assumptions made in the**

18

~~2~~ 3

**second paragraph and indicate exactly how many units would be actually needed to house 1,140 workers.**

18

**Please explain why there is an affordable housing overlay on 13 acres in Mid Carmel Valley and how the water to support 149 new units will be supplied. Please explain this sentence and the math used: "If developed at full potential (30 units per acre), the Mid-Valley AHO would accommodate 149 residential units on approximately 13 acres." Please explain how the "nitrate overloading" in the Mid-Valley area will not be made much worse by the AHO?**

19

 

**Section 4.13.1 Hazards and Hazardous Materials**

**Exhibit 4.13.1 Please identify the area of the Monterey Peninsula. Monterey, Carmel and a good portion of Carmel Valley are listed as "very high"!** 20

**Please explain in detail the thinking behind this statement: " All potential hazards and hazardous materials impacts from development and land use activities associated with the implementation of the 2007 General Plan would be less than significant and would not require mitigation."** 21

**Please explain why the Carmel Valley Emergency Response Plan 2004 was not included in this section. It lists numerous pages of hazardous material location in the Carmel Valley and notes throughout this report that emergency evacuation in Carmel Valley is "seriously challenging".** 22

**Please explain in detail the thinking behind this statement: The evacuation routes are designated and maintained to ensure the safe and efficient movement of people, belongings and emergency personnel including their support services during times of declared emergencies when there are only to escape routes out of Carmel Valley --Carmel Valley Road, a rural road consisting of mostly two lanes and the very narrow and windy Laureles Grade a 2-lane road. It is physically impossible to evacuate Carmel Valley when an emergency is declared.** 23

**Please detail the evacuation routes for the AHO at Mid-Valley. the "special treatment areas" --Rancho Canad Village, Gardner's Tennis Ranch, etc. Additionally explain in detail how buildout of these projects will not subject children, the infirm and elderly with diesel fumes, silicosis, and acetelene poisoning.** 24

**Please explain what facts were used to support this statement: This analysis assumes that the trend will remain constant and future regulatory scheme will be at least as stringent as those in place now."** 25

**Please explain what facts were used to support this statement: "These outreach programs would decrease potential wildfires through education and cooperation".** 26

**Who is responsible for periodically updating the detailed scientific analysis of fire hazards and define periodically -- annually or what?** 27

**Policy S-14.11. Please explain in detail who are the responsible parties.** 28

**Policy s-4.13. Who oversees the requirement that all new development will have adequate water available for fire suppression.** 29

5

**Policies S-4.24.and .25. What are the County prescribed standards and who is responsible?** | 30

**Policy S-4.29 Why is the meeting between the project applicant, planning staff, and fire officials only optional. Why not make it mandatory --explain the thinking behind this policy.** | 31

**Policy S-4.28 Who is responsible for checking that fire retardant plants are not removed and other plants substituted after the certificate of occupancy is obtained? Explain the process in detail.** | 32

**Cachagua Area Plan. please explain why this only encourages the formation and does not demand the formation.** | 33

**When will the development fees schedule be established so that new development pays its fair share for the infrastructure needed to provide fire suppression. Who will be responsible for collecting these fees and making sure that the infrastructure is actually built concurrent with development?** | 34

**Please explain in detail how the following policies will operate or function in Carmel Valley withy it's limited evacuation routes: S-5.9, 5.10, 5.11, 5.14, etc with the additon of the AHO at Mid-Valley and the special tratment areas listed previously.** | 35

**Please descrive in detail the location pf the emergency road connections required by CV-4.4 And explain exactly what is meant by periodic updating.** | 36

**Please explain detail 4.13.6 which states that all hazards and harardous materials impacts would be less than significant and would not require mitigation in relation to the constraints in Carmel Valley.** | 37

 

Traffic

Could you please add to the fine policy that Tim has drafted the following or something like it. Before the annual traffic study is presented to the Board of Supervisors in January, it must be reviewed and approved by the Carmel Valley Blue Ribbon traffic Committee.

38

Please indicate the exact date that the AM/PM peak hour traffic study was done for the Carmel Valley Traffic Improvement Program. If this study was done in July 2007 as indicated, the results are correct since school is out of session in July.

39

There still has been no explanation of what makes up the figure of 1188 housing units. Please supply a complete explanation and describe the method used to make this determination.

40

Please explain the method used in the General Plan analysis to determine that Carmel Rancho Boulevard and Rio Road are significantly impacted. Since my home office full length windows overlooks not only the intersection of these two roads but segments on both sides of that intersection, I do not see any significant impact or delay from 7am to 7pm on any weekday. If these two roads were significantly impacted I would be unable to leave my home for hours at a time. This statement in the General Plan analysis is not true!!!

41

Before he retired as head of Public Works, Ron Lundquist assured the Carmel Valley Blue Ribbon Road Committee that since the Rio Road Extension is no longer needed or necessary (see Carmel Valley Traffic Improvement DEIR), the original plan line would be abandoned by the County just as soon as GPU5 was approved. However, I see no indication that this plan line will be formally abandoned, why not? The only reason to keep the plan line would be to use the Rio Road Extension if Carmel Rancho Boulevard is significantly impacted.

42

Significance Determination. Please explain in detail what are the mitigation measures that will improve the impacts (on three segments of Carmel Valley Road) to a degree of less than significant.

43

Please explain the discrepancy between CV-2.10 (d) and (e) and CV-2.19 and CV-2.18 as to the improvements listed for the area ending at Ford Road. The first policy extends the work required from Ford to Pilot and then goes on to require additional work east of Esqueline while the second two policies do not. Please explain in detail the exact location of the improvements and what benefit they will have.

44

Only two passing lanes were recommended by the Carmel Valley Blue Ribbon Road Committee when it was originally formed. One was on the south side of Carmel Valley Road in front of September Ranch. The other was on the north side of Carmel Valley Road in front of Garland Park. (After the re-constituted September Ranch project was presented to the Road Committee, it twice voted down the passing lane on north side of Carmel Valley Road from Brookdale to the stoplight at Rancho San Carlos Road.) Please explain the justification for, the need, the benefit, and the exact location of the two passing lanes - 1/4 mile long - between Schutte Road and Robinson Canyon

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**Road and Rancho San Carlos Road and Schulte Road. Please explain in detail how the passing lanes could possibly work on these sections where there is an almost continuous left-hand turn lane along both these sections.** 46

**CV-2.18 and 2.19. Please explain how it is physically possible to make these improvements to Carmel Valley Road—shoulder widening, passing lanes, left-hand turn lanes, etc. Hillsides must be cut into. Water and utility lines will have to be moved and reburied. The financial cost will be such that no one project or projects in the future could provide through road impact fees. Please explain in detail why this is not just another way to 4-lane the Road from the mouth to the Village.** 47

**The Blue Ribbon Traffic Committee has been very vocal about opposing a stoplight at Brookdale and suggested more than once that the entrance be closer to the Red Barn where no stop light would be needed. Please explain in detail why Developers wishes should warrant traffic lights.** 48

**Please explain in detail the benefits of a traffic light at the Grade and Carmel Valley Road. Please explain why a 4-way stop sign would not provide the same benefit until a grade separation and run-away truck lane can be constructed. In addition, please explain in detail how heavy vehicles can be discouraged from using the Grade. The CHI has told the Road Committee that this cannot be legally done.** 49

**Please indicated for each road improvement whether is it safety/congestion management or capacity increasing. Please explain precisely the location of the "eastern terminus of Rio Road" and explain why the terminology has been changed from Carmel Rancho to Highway One on Rio.** 50

**In regard to the proposed climbing lane on Laureles Grade, please indicate exactly where the County now has easements and exactly where new easements would be needed.** 51

**Please have Public Works comment in detail on the new plan submitted to Neal Thompson, Public Works Traffic Engineer, at the Road Committe meeting of 1/15/09 for a run-away truck lane provided by realining the bottom section of Laureles Grade. This includes: using the present south bound lane left as the run-away truck lane, making the present north bound lane into a new south bound lane, and adding a new north bound on the right side of the grade.** 52

**Please explain in detail why this alternative would not be superior to a 4-way stop signor a traffic light in preventing potential deaths from a run-away truck of any size. Please exapplin in detail why this alternative would not be quicker and easier to complete rather than a grade separation to be built at some unknown and future date.** 53

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**Comments: Carmel Valley Master Plan Supplemental Policies**

While the writing in this plan is tighter and the plan itself better organized, we would like a detailed explanation of why many sections of the 1996 plan were omitted. Please respond with a detailed explanation of why each item listed below was deleted from the Supplemental Policies. For policies that have been modified or are found elsewhere, please indicate where these can be found and the reason for the modification.

1. The first six pages and page number 7 that lists Carmel Valley Master Plan Goals.
2. Page 8, 1.13 (CV), 2.3.2.1(CV), 3.1.1.1 (CV)
3. Page 9, 3.1.1.3 (CV), 3.1.4 (CV), 3.1.6 (CV), 3.1.7 (CV), 3.1.9 (CV)
4. Page 10, 3.1.15 (CV), 3.2.3.1 (CV), 4.2.2 (CV)
5. Page 11, 4.2.4 (CV) and 4.2.5 (CV)
6. Page 12, 7.1.5
7. Page 13, 7.2.2.2 (CV). Is there no recent pamphlet to replace the old one?
8. Page 14, 11.1.1.1 and 11.1.1.2 (CV)
9. Page 15 and 16 --Environmentally Sensitive areas. The majority of these policies have been replaced by a much less stringent and less detailed policy. Please explain why!
10. Page 16, 17, and 18. Environmental Constraints. Almost 20 policies appear to have been eliminated. Please explain why --in detail.
11. Page 18 and 19. The Air and Water Quality policies appear to have been eliminated. Please explain why -- in detail.
12. Page 19 and 20. General Land Use. Policies 26.1.9.1( CV), 26.1.2.1 (CV) (replaced by CV-1.1 which is much weaker!) 26.1.22 (CV), 26.1.23 replaced by the much weaker (CV-1.3), 26.1.24 (CV), 29.1.29 (CV).
- Page 21. 26.1.31 (CV), 26.1.32 (CV), 26.1.33 (CV) 26.1.34 (CV)
- Page 21 and 22. Please explain why all the policies relating to the Carmel Valley Airport have been eliminated in detail.
- Page 22. Residential Land Use. 27.3.6 (CV) and 27.3.7

Page 23. Commercial Land Use. 28.1.6 (CV), 28.1.7 (CV), 28.1.11 (CV), 28.1.12

Page 24. 28.1.17 (CV) and 28.1.20A

Page 25. Carmel Valley Village -- 28.1.22 (CV), 28.1.23 (CV), 28.1.24 (CV)

Page 25. Visitor Accomodations -- 28.1.26 (CV) and 28.1.27 (CV)

Page 26. Public/Quasi Public -- 31.1.4 (CV)

Page 27. Open Space--34.1.7 (CV) and 34.1.8 (CV)

Page 27,28, and 29. Transportation--37.4.1 (CV), 37.4.2 (CV), 39.2.2.3 (CV), 39.2.2.5 (CV), 39.2.5.2 (CV),

39.2.7 (CV), 39.2.8 (CV), 39.3.1.4 (CV), 39.1.5 (CV)

Pages 32,33, and 34. Public Services. 51.2.7 (CV), 51.2.8 (CV), 51.2.9 (CV), 51.2.10 (CV), 51.2.12 (CV), 51.2.13 (CV), 51.2.15 (CV)

#### **Specific Comments on Carmel Valley Master Plan Supplemental Policies**

Throughout the Supplemental Policies the word "shall" is used rather than the word "must". This includes but is not limited to the following policies: CV-1.3, CV-1.15, CV-2.1, CV-2.3, CV-2.4, CV-2.5, CV-2.6, CV-2.7, CV-2.9, CV-2.10 a-b-c-d-e-f, CV-2.11, CV-2.13, CV-2.14, CV-2.15, CV-2.17, CV-3.2, CV-3.3 CV-3.4, CV-3.5, CV-3.7 CV-3.8, CV-3.9, CV-3.10, CV-3.11, CV-2.12, CV-3.13, CV-3.14, CV-3.17, CV-3.18, CV-4.19, CV-4.4 CV-5.3, CV-5.4, CV-5.6, CV-5.7, CV-6.1, CV-6.4. "Shall" is a request; "must" is a demand. If the objective is to make GPU 5 as clear as possible please explain why the word "must" is not substituted for "shall" in the Carmel Valley Supplemental policies.

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In the same vein, in order to be very clear, the words "must be encouraged" should replace the words "should be encouraged" in policies CV-1.17, CV-1.19, CV-1.20, and CV-1.21. Please explain why this was not done in the Supplemental Policies. Also, please explain why the words "may be required" were used rather than "must be required" in Policy CV-3.19.

CV-1.1 Please explain in detail why the words "are intended to retain a rural character" have been substituted for the goal statement in the present CVMP "to preserve the rural character".

CV-1.2. Please define "the most appropriate portion of the property."

CV-1-5. We find the new map vary hard to read. Please explain in detail any changes between the map in the present CVMP and the new map in GPU 5.

**CV-1.5. I do not understand the second sentence. Please explain in detail.**

**CV-1.6. It is essential that this policy start with a well-defined base to avoid future confusion. See Exhibit A . We request that this table be completed as part of the response to our comments on the Supplemental Policies.**

**CV-1.10 There will be no ordinance proposed by Housing and Redevelopment for Work Force Housing until the present oversupply of units are absorbed. We suggest that the words "work force housing be eliminated until such an ordinance is passed by the Coard of Supervisors. In our opinion, this will eliminate confusion. Please comment in detail.**

**CV-1.22. Please supply along with your responses to our comments, the complete "Amended Carmel Valley Ranch Specific Plan, dated 11/3/76" and all updates. Please identify specifically what the future development increments are or may be sought. During the last expansion of this project, the attorney stated that no futher subdivision or deveolment was planned. Please explain in detail the thinking behind this new policy.**

**CV-1.25. Along with your responses to our comments, please supply all documents referred to in this policy. Please explain in detail why Rancho San Carlos is now designated as a special treatment area and please explain in detail any original conditions of this permit that are anticipated to be amended-- focusing speifically on the 41 units of employee housing that were required as condition of approval or any potential changes in this condition.**

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**CV-1.27. Rancho Canada Village . Please explain in detail why this is now being designated as a special treatment area. The application was presented with a specific plan. In addition, see our comment under CV-1.10 in regard to work force housing. The words work force housing should be deleted from this policy until a work force housing ordinance is approved by the Board of Supervisors.**

**CV-3.11. Previous reiterations of this policy have provided problems. We think a strict definition should be made between "god-planted" or "developer planted" trees. Trees planted by Developers in Subdivisions have with time created problems that are expensive to cure--roads, walkways, garages, patios, and homes disrupted by roots. Please explain why this distinction cannot be made and why it can not be made easier to remove "developer planted" trees when they become invasive.**

**CV-4.3. Along with your responses to our comments, please supply a copy of the Master Drainage Plan for Carmel Valley. To our knowledge such a plan does not exist. Please explain in detail, if the plan does exist, when such a fee will be imposed, who will monitor it, and who will implement it. And provide a time line for the development of the maintenance program.**

12

**CV-4.4. In the present CVMp, emergency road connections are identified. Please explain why these present connections are not listed here. If new connections are needed, please explain exactly when they will be identified, who is responsible for maintenance, and how will this maintenance be paid for. Complete detail is required.**

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**We will appreciate clear, cogent, and detailed responses.**



Questions/Comments Regarding 266 Cap - Excluded A

We support the proposed 266 cap. It is our understanding that the cap was developed by subtracting approved and unbuilt subdivisions, built and unbuilt single family dwelling and adjunct units, and vacant lots of record from the CVMP cap of 1,310 units and existing lots (p. 9 CVMP). We would like to confirm that the 266 cap is consistent with the overall cap of 1,310 and includes both units and existing lots.

To avoid confusion after GPUS is adopted, the specific projects and dwelling units that constitute approved and unbuilt subdivisions, residential and adjunct units should be identified in a table similar to the following:

| Category  | Units  | Source |
|---|--------|--------|
| Approved Subdivisions<br>Unbuilt - 1987 to 1998<br>• Project 1<br>• Project 2<br>• Etc. |        |        |
| Approved Subdivisions<br>Unbuilt - 1998 to 2006<br>• Project 1<br>• Project 2<br>• Etc. |        |        |
| Approved SFDS/Adjunct built<br>- 1987 to 1998<br>• Project 1<br>• Project 2<br>• Etc.   |        |        |
| Approved SFDS/Adjunct<br>unbuilt - 1999 to 2005<br>• Project 1<br>• Project 2<br>• Etc. |        |        |
| Approved SFDS/Adjunct built<br>and unbuilt - 2006 to 2008                               |        |        |
| Vacant lots of record   |        |        |
| Other, if any   |        |        |
| Total   |        |        |
| Cap   | 1310.0 |        |
| Remaining   | 266.0  |        |

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**Executive Summary Section 1, Table 1-2 (page 1-5) compared to Table 6-2 (page 6-27) in Section 6**

**1. LU-2, Executive Summary states that no conflict would result from the implementation of the 2007 General Plan with the land use policies of an adopted land use plan. The Carmel Valley Master Plan has adopted Land use policies which are gutted and subverted by GPU 5. Please explain why this is less than significant in 2030 and at Buildout.** 56

**2. AG-2, Executive Summary indicates that the level of significance is less than significant after 2030 and buildout. However, on page 1-39 of the Executive Summary it states that more than 7,000 acres of Williamson Act Farmland would be converted to non-agricultural use. Please explain why this is not a significant and unavoidable impact.** 57

**3. CLIM-1 Agricultural Resources. Please explain in detail what is meant by Cumulative considerable. Exactly what level of significance does this indicate?** 58

**4. Water Resources. We cannot find any policy requiring post-development run-off to be limited to pre-development run-off. Please explain how this will not impact water quality and please explain why this is not flagged as a significant and unavoidable impact. See WR-1, page 1-6 Executive summary.** 59

**5. On page 1-6, Executive Summary, WR-1 and-2 are shown as less than significant at 2030 and at Build out. However, on Table 6-2, page 37 they are listed as significant unavoidable impact on 2030 and at Build out. Please explain this discrepancy in detail. Also list exactly what "portions of the county" are impacted. On page 1-8, Executive Summary, these two items are listed as significant and unavoidable. Please explain why the change in detail.** 60

**6. Page 6-27, Bio 2.3, please explain exactly what adding "considerations means". Also under 4.9 please explain in detail how the mitigation measures listed, which do not go into effect and take no action until 2030 can be considered mitigation measures. The DEIR also finds that Mitigation Measure BIO-2.1 would reduce erosion impacts to less than significant. This deferred mitigation measure does not meet CEQA requirements since it does not include specific performance standards. Please explain why increased erosion should not be found to be significant and unavoidable.** 61

**7. Executive Summary, page 1-8, WR-8 is found to be less than significant in 2030 and at Build Out. However, WR-8 is omitted from table 6-2. Please explain why. Please provide the same explanation for WR-9, WR-R-10, and WR-11 -- all of which are omitted from Table 6-2.** 62

8. Executive Summary, page 1-9. WR-12, WR-13, and WR-14. Please define in detail a "flood hazard area". Does this mean in the 100-year flood plain? The 200-year flood plain? Does it mean the floodway where County regulations allow no building? Please explain why until 2030 building in "flood hazard areas" is found to be less than significant. Does this there will be no floods or just little floods until 2030? In both the Executive Summary and on Table 6-2 for WR-12, WR-13, and WR-14 at Build Out it is found that no mitigation is feasible since the extent and locations of future impact are unknown. Does this mean that no mitigation will ever be required or does it mean that some mitigation may be required. Please provide insight into this reasoning.

63

9. Executive Summary, page 1-9 and -10. CUM -2 is found to be "less than" and then on the following page 'cumulatively considerable". Please select either one finding or the other.

64

10. 4.6 Transportation. Please explain why TRAN-1A appears in the Executive Summary and does not appear on Table 6-2.

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11. Table 6-2 TRAN-1B-a states " the standard for acceptable level of service is to be achieved by 2026". While the Executive Summary states for TRAN-1B "development would create traffic increases which would cause the LOS to exceed the LOS standard". This is found to be significant and unavoidable 2030. How can a standard for acceptable level of service be achieved by 2026 when it is found to be significant and unavoidable in 2030?

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12. Explain why TRAN 1-D and -E and -F are omitted from Table 6-2 but included in the Executive Summary.

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**Transportation: TRAN1-B, TRAN1-E, TRAN3-E, TRAN3-B, TRAN4-B, TRAN4-E. In Chapter 6 but not in the Executive Summary: TRAN1B-a and TRAN 1B-b**

68

The DEIR finds that project-specific impacts on county roadways would not fall below LOS D because of Circulation Element Policies. Because Policy C-1.1 allows County roads and intersections to degrade below D through the Community Plan process, GPU5 should be found to have significant and unavoidable impacts from project-specific impacts on county roadways.

69

The DEIR addresses project-specific impacts of development under "2030 cumulative plus project conditions" which is defined as GPU5 2030 buildout plus growth in cities to 2030. It finds the impact on roads to be less than significant based on GPU5 policies. Since GPU5 policies allow for a fair-share contribution to roadway improvements rather than requiring improvements concurrent with projects, the conclusion is not supportable. Further, GPU5 policies do not affect city projects which could contribute to cumulative impacts. GPU5 should be found to have significant and unavoidable impacts from project-specific impacts on county roadways . "2030 cumulative plus project conditions".

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**Air Quality: AQ-3 only. However, AQ-1 listed in Chapter 6 as significant and unavoidable but in the Exec Summary it's listed as less than significant.**

71

Because GPU5 is inconsistent with the 2008 AQMP, it should be found to have a significant and unavoidable impact on regional air quality.

72

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14. Changes to Carmel Valley Road and other Roads within the Carmel Valley Master Plan are listed in the Executive Summary and Table 6-2 under mitigation measures. However no level is significance after mitigation is found in either document. Why not? Please explain in detail. Also explain in detail the source for these mitigation measures and supply in detail the rational for making these detailed changes. In addition, provide a specific time line for the construction of these changes, detail the costs of construction in today's dollars. Further, please explain how the Carmel Valley Traffic Improvement Plan works together with the General Plan Undate 5 and explain why the responses to comments made on the CVTIP have not yet been answered after 18 months.

73

15. Please explain why the following are omitted from Table 6-2: TRAN-2C,D,F and TRAN-3A, 3C, 3D, and TRAN 4A, 4C, 4F,5A,5B are omitted from Table 6-2. Provide the same detailed explanation for the omission of AQ2,4, and 5. The same information is requested for the complete omission of Cultural Resources and PSU .1 through -7, and 4.2, 4.3.

74

The IDEIR notes that cultivation on uncultivated steep slopes allowed under GPU5 could have a significant impact on biological resources. It, however, concludes (p. 4.9-76) that conversion of uncultivated agricultural lands to new farmland would not have a significant impact based on a conversion rate of 450 acres per year (1982-2006) and the assumption that cultivation would be dispersed.. Because these activities would be excludted under the proposed mitigation measures, they should be found to have a significant and unavoidable impact on biological resources.

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The analysis does not address the 40 artisan wineries, 200 dwelling units, tasting rooms and oither facilities that would be allowed in the AWCP. Because these facilities would be exempt from CEQA under GPU5 and therefore from proposed mitigation measures, they should be found to have a significant and unavoidable impact on biological resources

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