

Calderon, Vanessa A. x5186

From: Richard H Rosenthal [rrosenthal62@sbcglobal.net]
Sent: Monday, February 02, 2009 9:38 AM
To: ceqacomments
Cc: Richard H. Rosenthal
Subject: GPU 5 EIR Comments

Monterey County
Planning and Building
Inspection Administration

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Monterey County Planning Department

Comments on GPU-5 Draft EIR

Save Our Peninsular Committee submits the following comments regarding the draft EIR. SOP's comments are kept to a minimum and not duplicative of the comments raised by Landwatch, Carmel Valley Association and the Monterey Peninsular Water Management District all of which are incorporated herein by reference thereto.

1. The General Plan fails to correlate the land use element with the circulation element. That is, the land use element must be closely related to the circulation element. The GPU -5 fails this test. Consistent with this failure, the EIR fails to assess the impact of the land use element designations on the circulation element. As a result, the EIR fails to address when development will overwhelm the roadways or any mitigation measures that could prevent it. Inadequate correlation precludes an honest EIR. Also, the defeat of measure Z requires the County to modify certain assumptions and the results therefrom.

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2. Carmel Valley Traffic Issues:

The Ad Hoc Group of the Carmel Valley Road Committee prepared a December 8, 2008 Memorandum for Supervisor Potter that outlines glaring deficiencies in the traffic assessment concerning Carmel Valley. Of particular significance is the EIR's failure to adequately address the number of legal lots of record. See Appendix 1 to Memorandum. Also of concern is the confusion whether level of service C or D will be the LOS standard. This uncertainty prohibits a fair assessment of potential impacts and possible mitigation measures.

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3. Affordable Housing Overlays:

There is no rime or rason why these overlays were situated in an area of the County that has no infrastructure to support the resulting impacts.

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4. Water Quality and Supply discussion is inadequate becasue it does not address how salt water intrusion into the Salinas Valley and the Seaside Aquaifier will be arrested, what the costs are or the envrionmental impacts associated therewith. In addition the EIR fails to assess the possible environmental impacts associateds with new water supplies, the costs of the new supplies and their impacts on user rates. Also, the EIR fails to discuss the current state and impacts of providing treated water for non potatble uses.

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5. Each of the infrastructre elements rely on a Capital Improvement and Financing Plan that shall be

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completed within 18 months from the adoption of the General Plan. The Plan and EIR are meaningless without the Financing Plan because the feasibility of mitigation measures cannot be assessed. The General jPlan is more than 10 years in the making and the idea that there is no cost data attached to required infrastructure improvements is unacceptable. Also, the current collapse of the financial markets should be assessed to determine the likelihood of financing for these improvements, whether from public, private or a combination of the two. In a similar vein, any economic data relied upon for the General Plan and EIR should be revised to take into account the current state of the economy and the anticipation that it may stay in a similar condition for at least two more years.

Thank you for the opportunity to comment on the draft EIR.

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