

Comment Letter 1

David Mack
Planning Department, Monterey County Resource Management Agency
168 Alisal Street, 2nd Floor
Salinas, CA, 93901

Dear Mr. Mack

I have lived in Toro Park since 1976 and for all of the reasons that were discussed at the meeting on Thursday, November 8 at Toro Park School I am completely opposed to the Ferrini Ranch development.

Personally I have a view of cows grazing on a hill where Mr. Kelton and Mr. Harrod Jr. are proposing to build several homes.

Also, I wonder if the developers have driven through Toro Park on any weekday morning. If I were to forget my cell phone at home it would take me at least 25 minutes to travel 1 mile back home on Portola Drive. Their signal will not help with this problem and will only make it worse.

Toro Park is one of the best neighborhoods to live in Monterey County and we are united to keep it that way. I am hoping that you and your department will support our efforts.

Respectfully submitted,
Karen Adishian

1-1

RESPONSE TO LETTER #1 – ADISHIAN, KAREN

Response to Comment 1-1

Comments express opposition to the project based on impacts to private views and traffic on Portola Drive and through Toro Park Estates.

Responses to the issues raised are addressed in Master Response 1, Neighborhood Impacts.

Comment Letter 2a

Subject: FW: Impact of Ferrini Ranch on Toro Park Estates/ comments (Alternative 3B)

-----Original Message-----

From: Lauren Allen [mailto:laurenallen_3@yahoo.com]

Sent: Friday, November 09, 2012 1:01 AM

To: Mack, David x5096

Subject: Impact of Ferrini Ranch on Toro Park Estates/ comments (Alternative 3B)

I do not know if I am responding to the right person. Please let me know. I understand that comments need to be made before Nov. 16th. I have the following comments

1. I believe that by making a new intersection through Toro Park Estates while moving the hwy 68 closer to the Toro Park Estates could have an impact on the health of families (asthma, constant noise and light).
2. The impact of a new intersection will add a lot more traffic noise all day long as opposed to traffic noise during peak periods because vehicles will be starting and stopping more frequently for the traffic light at all times of the day and night. This has a huge impact on the homeowners.
3. The new traffic plan will hurt home values, especially for those closest to a new intersection and widening of 68.
4. The public and residents frequently use the dirt roads in front of Toro Park Estates for recreation walking/running/ dog walking and this will be a loss if hwy 68 is expanded into this area.
5. Why not find an alternative entrance to Ferrini Ranch that does not impact the homeowners of Toro Park Estates.
6. There are already so many congestion problems with hwy 68 to the point where at times it has been shut down both directions due to fatal accidents. With the Washington School District this can be a real challenge when trying to pick up kids from school or getting them to school when there are accidents on 68.
7. The entrance to Ferrini Ranch should remain on the opposite side of the road and not impact Toro Park Estates. Why do we have to change our entrance and be impacted by their development on the other side of the road. San Benancio already has a good traffic light and the Ranch should have an entrance off San Benancio where there would be less impact to homeowners.
8. Views from my home will be ruined.
9. FYI - The lupine don't hear traffic noise but people do. It seems that this county (or Caltrans- not sure who is in charge of this plan) is more concerned with disturbing the flowers, trees, and dirt than it is with the impact of placing a freeway through family's backyards. The next accident won't just be on 68; it will be inside Toro Park Estates boundaries.
10. Please put yourself in the shoes of the homeowner close to the new intersection and widening of the road, which will dramatically change their home, and try to see it from their perspective. The result will be a loss in the resale value of the home. The construction noise and mess will also contribute to a lot of dissatisfaction.

In protest of the plan.

L. Allen (homeowner in Toro Park Estates)

2a-1

RESPONSE TO LETTER #2A – ALLEN, L.

Response to Comment 2a-1

Commenter expresses concerns regarding a range of impacts to the Toro Park Estates neighborhood, primarily associated with the widening of Highway 68 and Alternative 3B.

Responses to the issues raised are addressed in Master Response 1, Neighborhood Impacts.

Comment Letter 2b

Pamela Lapham

From: Lauren Allen <laurenallen_3@yahoo.com>
Sent: Wednesday, November 14, 2012 8:28 AM
To: Mack, David x5096
Subject: Re: Impact of Ferrini Ranch on Toro Park Estates/ comments (Alternative 3B)

David,

Can you please add this to comments for Ferrini Ranch:

I am opposed to the proposed changes to Toro Park Estates.

I am concerned about the added noise of a new intersection proposed close to my house. I would like to bring your attention to the book "Welcome To Your Child's Brain" by Sandra Aamodt and Sam Wang. On page 93 of the book in regard to noise: "Living near a loud highway could damage your child's hearing as much as setting off firecrackers in her bedroom." Then go to page 96 where it explains that it leads to loss of hearing and development problems. pg. 96 " Loud noise destroys hair cells in the cochlea, starting with the most vulnerable cells, those that transduce high-frequency sounds. Doctors cannot reverse this damage, and hearing aids do not restore sound levels. The earliest symptom of hearing loss is usually difficulty understanding speech when there is background noise. By then, as many as half of the cochlear hair cells are already dead. Hearing loss is particularly damaging in children because it can impair language learning and academic accomplishment." page 96 of Welcome To Your Child's Brain by Sandra Aamodt and Sam Wang. Also from the book, "Practical Tip: PROTECT YOUR CHILD FROM NOISE, STARTING BEFORE BIRTH" And then remember that you are proposing to widen Hwy 68 and install a new larger intersection next to the homes of young families.

In changing the intersection from it's current location to a new location and making it a large 4 way intersection; Do you really know what the added noise level will be to the new location by changing the proximity to houses not previously exposed to this. I do not understand how this can be legally done.

This change of intersection location was never disclosed when we purchased the house in 2006. Will we be compensated for our loss of value to our homes due to the change that is being forced upon us. We bought our home for the location and now you are changing the location and environment.

Lauren Allen

From: "Mack, David x5096" <MackD@co.monterey.ca.us>
To: 'Lauren Allen' <laurenallen_3@yahoo.com>
Sent: Friday, November 9, 2012 8:49 AM
Subject: RE: Impact of Ferrini Ranch on Toro Park Estates/ comments (Alternative 3B)

Lauren:

Thank you for your comments. Your input will be included as a submitted comment during the public comment period.

Should you need additional informational or have questions, please contact me directly.

2b-1

RESPONSE TO LETTER #2B – ALLEN, LAUREN

Response to Comment 2b-1

Comments express concern regarding the noise of the new intersection (under Alternative 3B), its impact on children in nearby homes, and property values.

Please see Master Response 1. As explained in that response, the revised Section 4.0 of the RDEIR (Alternatives) includes additional information and quantitative analysis of changes in the noise environment caused by Alternative 3B and 5. All noise levels are required to be mitigated and maintained within acceptable thresholds as defined by existing County regulations.

Comment Letter 3

Pamela Lapham

Subject: FW: Ferrini Ranch

-----Original Message-----

From: Andrew Allison [<mailto:allison.aa@gmail.com>]

Sent: Friday, September 14, 2012 12:59 PM

To: Mack, David x5096

Cc: 112-Clerk of the Board Everyone

Subject: Ferrini Ranch

How did a project which includes the removal of 921 protected oak trees and building roadways to/within the development on steep hillsides (greater than 30%) while using 3-4 acres of public parkland, taken from Toro Regional Park, and which has a snowflakes chance in hell of final approval ever get this far?

3-1

RESPONSE TO LETTER #3 – ALLISON, ANDREW

Response to Comment 3-1

Comment questions general project viability.

General comments questioning project viability and processing are noted. All of the specific concerns and/or impacts mentioned (oak tree removal, slopes, and public park access) are identified, disclosed, and analyzed in the DEIR. No specific issues with respect to the adequacy of environmental analysis were identified. No further response is necessary.

Comment Letter 4

Toro Park Estates Home Association

November 15, 2012

David Mack, Associate Planner
Planning Department
Monterey County Resource Management Agency
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

Re: Comments on Ferrini Ranch Subdivision Draft EIR (SCH #2005091055)

Dear Mr. Mack:

Thank you for the opportunity to comment on the Draft EIR on the proposed Ferrini Ranch Subdivision. The Toro Park Home Association Board of Directors (TPHA) has carefully reviewed the Draft EIR. The collective experience of the Board members in living in this area is significant, and we believe we can provide a special level of insight to assist Monterey County in the review of the Draft EIR and the proposed project. In addition, our Board members have attended several recent public workshops on the project and have been able to absorb the concerns of residents of the area about the project.

The TPHA agrees with the Draft EIR's conclusions that the proposed project will result in significant unavoidable impacts to Traffic and Aesthetics. Noise is also a concern as it results from traffic increases and proposed improvements to handle traffic. While there are many impact areas of concern, we will focus our comments on these areas which are of most concern to our residents.

Traffic and Noise Impacts

The proposed project's traffic impacts are of great concern to the TPHA. As clearly pointed out in the Draft EIR, the project adds traffic to an already highly congested regional route and will create inconvenience and delays for Toro Park residents and the public. It will adversely affect commuters to and from the Monterey Peninsula. The TPHA does not want this project to lead to traffic "improvements" on Highway 68 that degrade the quality of living in Toro Park Estates.

A key problem is that the main portion of the project served by proposed Ferrini Ranch Road, as presently conceived, does not have adequate access to Highway 68. The project has only a single access point when it should have two or three. Ferrini Ranch Road is much too long for convenient use by future project residents, especially given the hilly and winding nature of the road. It will prove to be an annoyance for residents and will diminish the quality of the project. It will be unsafe in emergencies, especially during a wildfire. In its present layout, with only a single access point, the project is not consistent with sound planning practice. We are surprised that the County, with its reputation for good planning, would even consider the access arrangements as proposed. Although alternatives for achieving multiple access points to Highway 68 are plainly difficult, they are not impossible, and it is the responsibility of the developers and the County to ensure this gets done properly.

4-1

1

Comment Letter 4 Continued

Alternative 3, which reportedly has the support of County staff and the applicant, would place a new signalized intersection on Highway 68 just west of Torero Drive to serve as the single access point to the westerly part of the project. We oppose this approach because it still results in only one main access point and will disproportionately and adversely affect residents of Toro Park Estates. The TPHA does not believe Toro Park Estates residents should bear the full brunt of the traffic impacts of this project - in excess of 2,000 vehicle trips per day entering and exiting from Highway 68 immediately adjacent to our established residential neighborhood and Toro Park Elementary School.

In addition, the TPHA is opposed to proposed Alternative 3 because it extends the four-lane section of Highway 68 to and beyond this new intersection. Due to steep topography on the south side of the road, widening would have to occur on the north side of the state right-of-way, adjacent to the Toro Park homes. The result will be to greatly reduce the open space setback from Highway 68 that now exists. Figure 4-1D shows this clearly. In the vicinity of Torero Drive, Highway 68 travel lanes, in the current two lane configuration, are about 125-feet from the residential property lines. But if the Highway is changed to four lanes, this open-space set-back will be reduced to 50 to 60 feet. This is unacceptable to the TPHA. We recommend that other alternatives be developed that will avoid extension of a four-lane road in this area.

The Draft EIR Noise Section considers compatibility of the proposed residential project with existing noise sources including Highway 68 traffic. Noise contours are provided showing predicted traffic noise relative to the project (Figures 3.11-1a -d). However, the noise analysis appears to provide no noise contours for the Toro Park Estates neighborhood and does not appear to evaluate potential project noise impacts on the existing residences. Our concern is that if the project resulted in widening of Highway 68 to a 4-lane configuration, with a wide center median, traffic noise will extend further into our neighborhood of existing homes causing County noise standards to be further exceeded for many existing residents and for the elementary school. Use of a stoplight-controlled intersection where there is none now would also increase noise from large trucks shifting up and down. This potential impact should be thoroughly evaluated in the revised Draft or Final EIR. Appropriate mitigation measures would be needed to avoid increasing traffic noise for existing residences. A berm with vegetation would undoubtedly be needed to help attenuate noise if Alternative 3 were to move forward. Our Board would be opposed to use of a sound wall for aesthetic reasons.

It is also noted that the existing open space setback between Highway 68 and the westerly portion of Toro Park Estates has a trail and is heavily used by residents and the general public for walking, jogging and bicycling and serves as an extension of the BLM lands trail system. This existing setback area is landscaped and lends an attractive appearance for travelers on Highway 68 - a designated county scenic highway. It would be a shame for Highway 68 widening to take away this public use area.

Widening Highway 68 to four lanes for approximately ¼ of a mile per Alternative 3 is a waste of limited public funds. It will not solve traffic problems because the roadway will revert to its two-lane configuration just to the west of Toro Park Estates. Why ruin the ambiance of our neighborhood and a scenic area when no significant traffic benefit is achieved? The TPHA supports careful long-term planning for Highway 68. We believe incremental improvements such a proposed in Alternative 3 will be a mistake unless made within the context of an overall route plan that preserves the scenic and rural character of the area.

4-1 cont'd

Comment Letter 4 Continued

To meet this project's highway access needs, and to minimize impacts to Highway 68, the project's access to Highway 68 should utilize the existing intersections at Portola Drive and San Benancio Road where facilities are already available to accommodate the additional traffic. San Benancio is a public road and significant improvements were recently completed at its intersection with Highway 68. An emergency access point somewhere on Highway 68 could also be used, and perhaps a right turn only lane out of the project and towards Salinas would be useful.

Project access to Highway 68 at the Portola Drive interchange will require use of a portion of the Toro Regional Park property. While use of public park property for access to a private development may not seem like a good precedent, it could be justified if equal or more acreage was provided to the park by the developer as compensation. The extremely heavy usage of the flatter portions of Toro Regional Park presently points to the need for additional flat land for picnic and sports use to accommodate future population growth. Working with this developer to obtain additional usable park land in exchange for an access right-of-way through the park to his property could result in overall public benefits. For example, the "bull field" comes to mind as a great future addition to Toro Regional Park as a means of preserving its open space values, and increasing public recreation opportunities. There may even be some roadway access options through this area (to River Road) that could support this project and its affordable housing component better than the current arrangement.

Aesthetics

The Draft EIR identifies a series of potentially significant aesthetic impacts to the public view shed as seen from Highway 68, River Road, and San Benancio Road and from other public viewing areas including Toro Regional Park, and the former Fort Ord BLM lands. The Draft EIR concludes that roadway improvements associated with the project that are located within the "critical" view shed constitute a significant and unavoidable impact for which a declaration of overriding considerations must be made by the Board of Supervisors. We agree with this assessment.

However, the Draft EIR does not adequately characterize the visual impacts of the project when viewed from the former Fort Ord BLM recreational areas in close proximity to the north. In particular, the portion of the subdivision adjacent to the picnic area of Toro Regional Park (lots #86 through #136) will occupy open grass-covered hills and terraces with minimal tree cover in plain view from existing homes in Toro Park Estates and from all of the BLM lands – not just from higher elevations in Fort Ord as stated in the Draft EIR. The Draft EIR indicates that current public recreational usage of this part of Fort Ord is estimated at about 50,000 people per year. Plainly, the project's visual impacts, when viewed from these public lands, are not a small consideration.

These gentle hills, which are to be the site of a large part of this residential project, are truly beautiful in their present natural condition – forming the foreground of magnificent views of Toro Regional Park, Black Mountain/Simas Peak, and Mount Toro. The TPHA recommends that this part of the Draft EIR be revised to more accurately depict and describe the aesthetic impacts to recreational users of the BLM land and provide reasonable mitigations to minimize the visual impacts. We recommend that home sites planned for the open areas of the property be required to establish and maintain sufficient native oak trees to form a dense landscape screening. Non-native trees and shrubs within the view shed should not be allowed. We also recommend that stringent controls be established by the County to minimize road and building pad grading and to eliminate visible cuts, fills, and side-casting of soils.

4-1 cont'd

4-2

Comment Letter 4 Continued

The TPHA would like to invite project Staff, the consultants, Planning Commissioners, and members of the Board to walk this area and observe these scenic vistas for themselves (there is pedestrian access from Davenrich at Montera Drive and/or Veronica Drive in Toro Park). In doing so, you will realize how the scenic vistas of the project area are an integral part of the recreational experience on the BLM lands, and the actual extent of impacts the project will have to this view shed.

4-2
cont'd

Conclusion

The TPHA does not want to obstruct another property owner's use of his property, but at the same time does not believe that the quality of life for existing residents of Toro Park Estates should be excessively compromised by the project. We enjoy our beautiful, scenic neighborhood so much – this aspect of the area is the reason most of us chose to live here. We request that the County work creatively to solve access problems by achieving two access points into the westerly portion of the project at the existing interchanges and avoid creating a new stop-controlled intersection west of Torero Drive. We request that additional lanes not be added to Highway 68 – or that such a decision be put off until a time when a comprehensive plan for the route is devised that protects existing neighborhoods and the scenic nature of this route. And, we request that maximum naturalistic screening of future homesites be provided in order to lessen the visual impact to the BLM recreation lands. We would be pleased to discuss any of these points with County officials if so desired. Thank you in advance for consideration of these comments.

Sincerely,



Gary Aronson, President,
Toro Park Estates Home Association Board of Directors
22632 Torero Drive
Salinas, CA 93908

Sheri Hauswirth, Corresponding Secretary
Mike Singh, Treasurer, Greenbelts and Parks
Carol Romo, Bull's Tale Editor/Ads
Lynn Kennedy, Membership
James DeLorimier, CC &R's
Bill Farrel, Architectural Review

CC: Supervisor Dave Potter

2.0 RESPONSE TO COMMENTS ON DEIR

RESPONSE TO LETTER #4 – ARONSON, GARY (TORO PARK ESTATES HOME ASSOCIATION BOARD OF DIRECTORS)

Response to Comment 4-1

Comments express a range of concerns regarding local traffic congestion, project access, emergency access, Alternative 3 access and related noise impacts, decreased setback distance, and impacts to Toro County Park.

Please see Master Response 1 regarding these issues related to the Toro Park Estates neighborhood.

Response to Comment 4-2

Comments express concerns regarding aesthetics and views from public areas within Toro Park Estates.

Please see Master Response 1 regarding these issues.

Comment Letter 5

Calderon, Vanessa A. x5186

From: Marty Bacigalupi [MBacigalupi@slakey.com]
Sent: Wednesday, November 14, 2012 7:25 AM
To: ceqacommments
Subject: Ferrini Ranch Project

I have great concerns regarding the Ferrini Ranch Subdivision project on Highway 68. As a resident of Toro Park, the traffic congestion is already at unacceptable levels at numerous times during the day. Highway 68 traffic is already diverting to Portola Dr. in the morning to avert the one mile backup. This in conjunction with the traffic from school kids being dropped off, makes this a dangerous situation. With the addition of hundreds of more vehicles, even if Highway 68 is widened, will only compound the problem. The noise and sound pollution will be increased dramatically, loss of trees and walking paths will lessen the quality of life, and alter the community we live in. Commute times will increase both in the morning and evening in an already dangerous driving corridor. I do not believe a project of this size benefits anyone who currently lives on the Highway 68 corridor. I believe there are many more sights, in less congested areas, if additional housing is required in Monterey County. I strongly request that this project be reviewed and denied.

Regards,
Marty Bacigalupi

5-1

2.0 RESPONSE TO COMMENTS ON DEIR

RESPONSE TO LETTER #5 – BACIGALUIPI, MARTY

Response to Comment 5-1

Comments express general concerns regarding increased traffic on Highway 68 and Portola Drive, increased noise levels, and loss of trees and trails (presumably due to widening Highway 68 under Alternative 3B).

Commenter is referred to Master Response 1 regarding these issues. Please also see the RDEIR, Section 4.0, for additional noise analysis. As explained in the analysis of Alternative 3B (and Alternative 5) of the RDEIR, these alternative designs will reduce total tree removal and will result in fewer biological impacts throughout the project site.

Comment Letter 6

Marti Beeck
22753 Ordonez Dr.
Salinas, CA 93908

11/11/12

David Mack, Planning Dept.
168 Alisal Street, 2nd Floor
Salinas, CA 93901

Dear Mr. Mack,

I was shocked recently to learn details of the Ferrini Ranch building project. It is important to the community of Toro Park, the well-being of the general area and the environment, that planners consider all parts of the community impacted by construction for this project.

As someone who worked in education for many years, I was surprised that the EIR did not include a study of the impact on our schools. The builder said that there would be an estimated 53 new students. It is not clear how he arrived at this number, and it seems probable that the number would be significantly larger. He also claimed that it would add a little over one student per classroom, and this building project would bring in money for the schools in the form of ADA.

It is my understanding that the Hwy 68 community schools are already significantly overenrolled. I have seen the impact of new student influx happen in other communities. Since schools are required to welcome new students with open arms, this claim of "benefit" is strongly exaggerated. Although schools would receive ADA, they would also have to accommodate these new students at a time when there are already more students than they are equipped to handle. Schools in this scenario are burdened with supplying bus service, implementation of larger classes (it is certain that the numbers will not be spread so neatly to be an additional 1+ student per classroom.), combination-grade classes, and compromising the existing school playground with portable classrooms. Also include school bus service to new areas, and other facility complications: cafeteria, assemblies etc., and staff have to be staggered to accommodate overcrowded campuses. Since everyone won't take the bus, there is sure to be even more traffic further stressing traffic on Hwy 68, Portola Rd., and parking on Portola.

Segue to the traffic on Hwy 68 problem. There was much discussion about this issue at the LandWatch and Ferrini meetings. I commute every day to my job at Ryan Ranch, so I have experience with this. The commute is extremely fragile as it is now. I have tried to adjust my work schedule to come and go at times that are not the worst. Even so, it is still dysfunctional. When there are events at Laguna Seca, I have had to come home by way of Fort Ord and Reservation Road. I have coworkers and friends who live in South Salinas/ Las Palmas areas who would like to commute on Highway 68 to Ryan Ranch or Monterey, but it is so bad that they drive Reservation Road through Fort Ord or Marina *daily!* Shouldn't we take into consideration those who need to commute on Hwy 68 but gave up? Is this responsible and

6-1

6-2

Comment Letter 6 Continued

forward-thinking at a time when we should be enabling people more than ever to commute more reasonably?

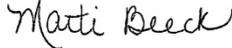
We were told by the builder that the EIR states that 70% of the residents from the proposed new homes will drive toward Salinas, and a short span of four-lane road has been proposed that will "neutralize" the impact of the additional traffic. It is likely that the 70% estimate came from some equation based on the distance between Monterey and Salinas, however it is not reflecting the reality of people's habits. The four-lane road addition will not solve any problem, but will only increase a bottleneck traffic jam where it merges into two lanes. For all of this non-solution, land which is now a buffer zone from noise and traffic, also used for walking, running, and bike riding, will be significantly reduced or most likely eliminated. Additionally, the residents who will be much closer to the busy highway will have a berm or wall instead. Both of these options, by the way are unsightly, and I haven't even begun to discuss the viewshed.

6-2

Other infrastructure concerns also prevail; inadequate water, sewer, impact on fire service, environmental impact and adding low-income housing near Toro Regional Park, clumped in an area where the current residents are already experiencing problems with the public loitering and engaging in illegal activity. I could go on and on..... So far I have not heard **anything** about the Ferrini Ranch Project that has convinced me that it is a good idea. Please consider the horrible impact that this project will have on the environment and the community before it is too late.

6-3

Respectfully Submitted,



Marti Beeck

shmartib@gmail.com

cc: Dave Potter
LandWatch

RESPONSE TO LETTER #6 – BEECK, MARTI

Response to Comment 6-1

Comments express concern with local school capacity and enrollment.

The project's potential impact on existing schools is addressed under Impact 3.10-2 starting on page 3.10-9 of the DEIR. The DEIR provides projected student generation for Washington Union Elementary School District (55 students), Spreckels Union School District (38 students), and Salinas Union High School District (51 students), based on district boundaries relative to the project site. Existing enrollment figures for all affected districts are identified on page 3.10-3. All districts were contacted for their current enrollment figures and current student generation rates.

Payment of required school impact fees provides sufficient mitigation for school impacts under the California Government Code, as detailed on page 3.10-10 of the DEIR. No significant physical environmental effects predicted from the increase in enrollment warrant additional mitigation.

Response to Comment 6-2

Commenter states concerns regarding Highway 68 congestion, widening, and trip distribution.

Commenter is referred to Master Response 1 regarding impacts to the roadway system, reduction in delay and cut-through traffic, and localized improvement to existing State Route 68 operations from the widening concept proposed in Alternative 3B and Alternative 5. Also see Master Response 1 and Alternative 5 within the RDEIR regarding anticipated impacts from roadway widening. According to the DEIR traffic study (Technical Appendix G), trip distribution for the project is based on the Association of Monterey Bay Area Governments (AMBAG) four-county regional traffic forecasting model select zone analysis and on actual travel patterns within the study area.

Response to Comment 6-3

Commenter states general concerns regarding infrastructure (water supply, sewer service, and fire service) and the concentration of low-income housing associated with the Ferrini Ranch project.

Impacts associated with water supply are addressed in Response to Comment 8-1 and Master Response 2. The proposed project's potential wastewater impact is addressed under Impact 3.10-6 starting on page 3.10-20 of the DEIR, which is considered less than significant due to adequate sewer treatment capacity. Potential fire service impacts are also addressed in Section 3.10. The location and quantity of inclusionary housing relative to existing residential areas is a perceived socioeconomic concern, not an environmental issue to be addressed under CEQA. Projects in Monterey County have an obligation to meet certain affordability requirements consistent with adopted ordinances and the County's Housing Element.

Comment Letter 7



November 16, 2012

David J.R. Mack
Associate Planner
Monterey County Resource Management Agency
Planning Department
168 W. Alisal Street, 2nd Floor
Salinas, CA 93901

Re: Ferrini Ranch Subdivision Project, Draft Environmental Impact Report (PLN040758;
SCH#2005091055)

Dear Mr. Mack:

The Big Sur Land Trust (BSLT) appreciates the opportunity to provide these comments on the Draft Environmental Impact Report (DEIR) for the proposed Ferrini Ranch Subdivision. The project includes an application for a proposed Combined Development Permit for the construction of a 212-unit subdivision on 870 acres of land located outside the City of Salinas, along the scenic Highway 68 corridor between San Benancio Road and River Road. The project is split between two areas – a “western parcel” located between San Benancio Road and the parklands of Toro County Park and an “eastern parcel” stretching between River Road and Marks Ranch, a property owned by the Big Sur Land Trust.

Founded in 1978, the mission of the Big Sur Land Trust is to conserve the significant lands and waters of California’s Central Coast for all generations. In collaboration with partners and the community, the Land Trust has protected more than 38,000 acres of land in Monterey County. A primary conservation goal of the Land Trust is to promote and sustain good land stewardship at all levels of the community, working with private landowners, public agencies, non-profit organizations and community members. This work includes identifying and conserving lands and critical habitat linkages essential to supporting wildlife populations.

The Big Sur Land Trust purchased the 816-acre Marks Ranch in 2007 to provide additional public parkland for community recreational use and enhanced outdoor learning experiences and to protect the Ranch’s natural characteristics, especially its wildlife habitat. Since acquiring the property, wildlife research supported by the Land Trust has shown Marks Ranch to be a highly active wildlife movement, breeding and habitat area and part of a larger matrix of habitat that includes Toro County Park and Fort Ord public lands. Taken together these lands form a critical linkage or wildlife corridor allowing wildlife to move between the upland habitats of the coast ranges (Santa Lucia and Sierra de Salinas mountains south of Highway 68) and the lowland and coastal habitats of Fort Ord (north of Highway 68) and shores of the Monterey Bay National Marine Sanctuary (Diamond et al. 2010). Key to the efficacy of this corridor is the safe passage

7-1

Comment Letter 7 Continued

2

Ferrini Ranch Subdivision
BSLT Comments
November 16, 2012

under Highway 68 afforded by the El Toro Creek underpass and the lands within the Ferrini Ranch, both of which facilitate wildlife movement that is critical to maintaining viable wildlife populations. As the proposed Ferrini Ranch Subdivision project is located within this known and important wildlife movement corridor, we are concerned that the development will have negative impacts to wildlife and habitat connectivity by reducing and further fragmenting available habitat, restricting wildlife movement, and impairing safe use of the corridor. We are also concerned that the proposed mitigation measures and alternatives discussed in the DEIR are inadequate and do not go far enough in addressing potential significant impacts. Ferrini Ranch is part of a regionally significant landscape for wildlife movement (See Attachment 1) and it is imperative that its function as a wildlife corridor not be compromised by the proposed development. While the significant conservation values of this landscape might lead us to prefer adoption of DEIR Alternative 1 (No Project Alternative), our comments below focus on ensuring that, if a development footprint is eventually adopted for Ferrini Ranch, it be designed to sustain habitat connectivity and minimize both short and long-term negative impacts to wildlife to the greatest degree possible.

The importance of wildlife corridors

Arguably one of the most important factors for maintaining wildlife populations are wildlife corridors and safe crossings. Wildlife corridors enable animals to move through and between open, undeveloped habitat patches so they can hunt, reproduce, preserve genetic diversity and raise their young. Isolated habitat patches effectively trap animals that can lead to local extinction. Habitat fragmentation has been identified as the most significant threat to biodiversity (Thorne et al. 2002). Wildlife corridors also contribute to public safety by ensuring that animals have sufficient habitat linkage areas to move to and from core habitat areas which decrease the need for animals to try unsafe routes that may result in deleterious human/wildlife interactions on roads and in neighborhoods.

The State of California has addressed the necessity of maintaining a network of connected wildlands essential to supporting diverse natural communities and native biodiversity found within the state. The California Essential Habitat Connectivity Project (2010) is intended to inform future land-use and planning decisions. It describes the central coast region as highly fragmented, growing increasingly more so as ranchlands and open space are developed and converted to more intensive uses (Spencer et al. 2010). Roughly following the Highway 68 corridor, the land between Salinas and Monterey is considered part of an Essential Connectivity Area, connecting the Sierra de Salinas mountain range flanking the Salinas River and the Santa Lucia Mountains running along the Pacific Coast. This connectivity includes Marks Ranch, Toro and Ford Ord Public Lands.

Ferrini Ranch is part of a regionally significant wildlife corridor

Wildlife monitoring by Connectivity for Wildlife (CFW), a wildlife research organization, provides evidence that lands within Ferrini Ranch are part of an active wildlife corridor connecting large blocks of habitat on either side of Highway 68. Soon after the Land Trust acquired Marks Ranch BSLT contracted with CFW to document wildlife sightings and signs on the ranch and develop a better understanding of wildlife activity and movement on Marks Ranch and the surrounding area. CFW documented wildlife movement on the ranch through track and

7-1
cont'd

Comment Letter 7 Continued

3

Ferrini Ranch Subdivision
BSLT Comments
November 16, 2012

sign identification and the use of photographic “trap” stations, and used the data collected from the field observations to “ground truth” habitat suitability models used to predict likely animal movement patterns. The information gathered through this process determined that Marks Ranch provides important habitat for many species of wildlife. In August 2008 the study was expanded beyond Marks Ranch, focusing on the north end of the Sierra de Salinas Mountains and the area around Marks Ranch, Toro County Park, and Fort Ord public lands. The report – The Central Coast Connectivity Project, Northern Monterey County Linkages: Report on the Mount Toro to Fort Ord Reserve Study 2008-2009 (published in September 2010) – discusses data collected during a 14-month monitoring period. During this time period 404 individual detections were recorded of animals moving through the bridge underpass on Highway 68 at El Toro Creek. Mountain lions, gray foxes, bob cats, coyotes, deer, North American badgers, and Monterey dusky-footed woodrats, were among the species found to utilize this passageway. Both the North American badger and Monterey dusky-footed woodrat are listed as California Species of Special Concern. According to the study this high volume of passages likely indicates that this site (Highway 68 underpass at El Toro Creek) and surrounding habitat is providing important connectivity for multiple species and serves as a critical pathway or corridor for animal movement (emphasis added).

The DEIR is inadequate in its treatment of wildlife corridors

While the DEIR acknowledges the importance of wildlife corridors in sustaining wildlife species, makes mention of the barriers that currently exist in the project area that may impede wildlife movement (Highway 68, the residential subdivision at Toro Park Estates and the concrete wall between the highway and the subdivision) and identifies the El Toro Creek underpass as one of the few significant safe passages for wildlife left in the area (see page 3.3-25 to page 3.3-26), the discussion and analysis is very limited.

First, the DEIR relies primarily on one brief technical memo written in 2008 for its analysis and conclusions (Appendix C, Volume II), not the most current studies or consultation with habitat connectivity and corridor experts in the field. There is a rapidly increasing base of knowledge being developed on habitat connectivity and wildlife corridors that should be tapped into and used in the DEIR to analyze the impacts of the proposed development and to design corridors that ensure safe wildlife passage through this area. The DEIR should be revised to incorporate the findings from the most current scientific literature and the expertise of experienced corridor scientists and natural resource managers.

Second, the DEIR makes only cursory mention of the CFW study and fails to note the study’s conclusion that proposed development in the area “would result in a significant decrease in wildlife habitat and substantial fragmentation of the remaining habitat at this current safe linkage... would severely impair access for wildlife between protected areas at Fort Ord and Toro County Park and Marks Ranch...could effectively isolate populations and individuals of such sensitive species as North American badger and mountain lion...isolation of these populations could lead to their local extinction in otherwise viable lowland and coastal habitats along the southern portion of Monterey Bay.” The DEIR should be revised to include the results and conclusions of this study.

7-1
cont'd

Comment Letter 7 Continued

4

Ferrini Ranch Subdivision
BSLT Comments
November 16, 2012

Third, the DEIR focuses exclusively on wildlife use and movement on lands immediately adjacent to the El Toro Creek underpass and not the rest of the “connectivity lands” located within the “western parcel” of the proposed subdivision. No mapping is included showing how animals will make their way safely through the proposed maze of subdivision development to access the underpass. Mapping should be included in the DEIR that demonstrates how the functionality of the corridor – the El Toro Creek underpass, Ferrini Ranch lands adjoining the underpass and throughout the subdivision to its border– will be maintained so as to not significantly impair wildlife movement.

DEIR wildlife corridor mitigation measures are inadequate to reduce significant impacts to insignificant impacts

The DEIR states that the project would have potentially significant impact on wildlife corridors. The focus of impact analysis and corresponding mitigation is on the area adjacent to the El Toro Creek underpass and eight of the proposed residential lots. It proposes three mitigation measures – site redesign to remove or relocate development away from the El Toro Creek area, implementation of CC&R’s limiting use of solid barrier fencing beyond the building envelopes and yards of the eight residential lots, and implementation of an Open Space Management Plan – concluding that, if implemented, these mitigations would reduce the project’s effect on the wildlife corridor to less than significant with no further mitigation necessary (pages 3.3-55 to 3.3-57).

First, no details are offered here as to what the site redesign mitigation proposed would look like and what changes and potential impacts might result from such a redesign. It appears that the redesign is left for a later time. Such a redesign should be part of the EIR process and addressed in an updated DEIR that is re-circulated for public review and comment.

Second, the focus of analysis on El Toro Creek and the eight residential lots in the vicinity seems to be predicated, at least in part, on the conclusions of the brief technical memo written in 2008 (DEIR, Appendix C, Volume II) that suggests that a corridor width of 300-400 feet is a sufficient width for a wildlife corridor. The memo also suggests that there is little research or data on optimal widths of corridors. This is not accurate. For example, it has been noted by several expert corridor biologists that the minimum width of a viable corridor for multiple species is 2 km (Penrod et al. 2006). As noted previously there is a rapidly increasing base of knowledge on wildlife corridors that should be tapped into and used in the DEIR to analyze the impacts of the proposed development and to design corridors and mitigation measures that ensure that a safe and functional corridor is preserved. The DEIR should be revised to reflect this.

Third, beyond the relatively small radius of El Toro Creek, the analysis fails to consider impacts on wildlife movement within the rest of the “western parcel” of the proposed subdivision. For example, lots 1-39 and associated roads (identified in the Tentative Vesting Map, Alternative 3 A and B) are close enough to the wildlife passage route to and from the El Toro underpass that they can be expected to have a significant impact on the functionality of the corridor. Indeed these lots are lined up in such a way as to effectively block off access to the larger habitat block beyond the subdivision and on towards Toro County Park. This reduction in permeability may compromise the utility of the corridor. We recommend that these lots be removed or relocated.

7-1
cont’d

Comment Letter 7 Continued

5

Ferrini Ranch Subdivision
BSLT Comments
November 16, 2012

The negative effect may be even greater from cumulative impacts associated with the adjacent proposed Harper Canyon (Encina Hills) development. These cumulative impacts should also be specifically discussed and evaluated in the DEIR.

As noted above, the proposed mitigation measures include requiring that the applicant file for the review and approval of an Open Space Management Plan (OSMP) prior to recording the final map for the subdivision. Given the likely importance of these open space areas to wildlife movement, the configuration of these open space areas should ensure habitat connectivity. It is not clear from the maps in the DEIR that there is connectivity between the open spaces areas identified as Parcel A; there should be unobstructed access between them to ensure wildlife can move through them. We ask that planners and the applicant provide for long-term wildlife connectivity management within the open space based on the best available science and consultation with experienced corridor experts. We also recommend that the OSMP include a sustainable grazing plan developed in consultation with experts in the field. For example, the Land Trust, its fourth generation ranching partner the Violini family and Monterey County Parks are working together to implement a stewardship grazing plan on the Marks Ranch property that will improve and maintain native grasses, water quality, and reduce soil erosion as well as ensure the long term viability of the ranch for cattle grazing. We also ask that an open, public process be implemented to allow for public review and comment on the OSMP, prior to its approval. This should be reflected in a revised DEIR.

7-1

The Project DEIR does not ensure preservation of wildlife corridors

The Project DEIR and its proposed alternatives, including Alternative 3-B, identified as the Environmentally Superior Alternative, do not adequately address the project's potential negative impacts to wildlife passage or provide the modifications necessary to ensure that the regionally significant wildlife movement corridor is preserved. For example, as noted above, lots 1-39 and associated roads (identified in the Tentative Vesting Map, Alternative 3 A and B) pose an obstacle to wildlife trying to access the larger block of habitat located just beyond the subdivision. The proposal in Alternative 3-B to relocate several residential lots is a step in the right direction, but does not go far enough to facilitate wildlife movement. Alternative 3-A includes an access road through Toro County Park ("Ferrini Ranch Road") that, if constructed, would result in the unacceptable loss of public parkland in favor of a private development. It would also present another road that would serve as a barrier to wildlife that could increase the amount of vehicle-animal collisions. Alternative 3-B would include a new signaled interchange on Highway 68 resulting in changed driving patterns. This coupled with road widening and increased traffic volumes associated with the development would compound the already negative impacts to wildlife associated with Highway 68, possibly resulting in increased vehicle-animal collisions and road kills without any provision for enhanced and more effective passageways under the highway. According to the technical memo written in 2008 (DEIR, Appendix C, Volume II), an already high number of hit-by-car deer calls occur during the breeding season (20-30 hit-by-car deer calls a month in the area). In Parcel D, we are also concerned about lots 141-43 in terms of blocking or impeding movement of wildlife into and from the floodplain of the Salinas River.

Comment Letter 7 Continued

6

Ferrini Ranch Subdivision
BSLT Comments
November 16, 2012

Additional comments:

The DEIR project description needs revision. The DEIR (p. 2-1) describes the “eastern parcel” of the proposed subdivision as being located between River Road and Toro County Park. This is inaccurate. This description should be revised to recognize that the “eastern parcel” is located between River Road *and Marks Ranch, a property owned by the Big Sur Land Trust.*

The historic 816-acre Marks Ranch sits in between the Ferrini Ranch “eastern parcel,” the large residential development at Las Palmas Ranch and Toro County Park. Over the last several years BSLT has worked with Monterey County Parks to apply for state acquisition funds to allow County Parks to purchase portions of the ranch to expand County parkland and protect it as open space. Between 2010 and 2012 the County acquired 737 acres of Marks Ranch from BSLT. BSLT retains ownership of 79 acres within the lower part of the ranch, a portion of which is directly adjacent to the “eastern parcel” of the Ferrini Ranch (See Attachment 2) and proposed housing Parcel E.

The DEIR should be revised throughout to reflect this information.

It is noteworthy that the California Department of Fish and Game and the Wildlife Conservation Board approved a total of \$2.7 million in state grant funds to the County to support the County Park acquisitions of Marks Ranch because of the value of Marks Ranch as a highly active wildlife movement, breeding and habitat area. This should also be kept foremost in mind in the location of housing within Parcel E. Developing housing units in a highly active wildlife area may put either humans and/or wildlife at risk.

Conclusion

Unless redesigned to ensure habitat connectivity and unimpeded wildlife movement, the Ferrini Ranch subdivision project will likely highly degrade or sever a regionally significant wildlife corridor. There is a wealth of current scientific information that can and should be accessed, along with the expertise of corridor scientists and resource managers, to evaluate and redesign the proposed subdivision to ensure that the location and management of housing and other infrastructure, and the implementation of mitigation measures, provide a functional corridor that can be effectively managed to support wildlife populations over the long term. The DEIR should be revised to more effectively address these concerns, as well as propose additional alternatives, and be re-circulated for public review and comment.

Should you have any questions about these comments, wish to discuss them or need additional information please feel free to contact Rachel Saunders, BSLT Marks Ranch Project Manager at [rsaunders@bigsurlandtrust.org](mailto:rσαunders@bigsurlandtrust.org). Again, we appreciate the opportunity to comment.

Sincerely,



WILLIAM H. LEAHY, II
Executive Director
Big Sur Land Trust

7-1
cont'd

2.0 RESPONSE TO COMMENTS ON DEIR

RESPONSE TO LETTER #7 – BIG SUR LAND TRUST

Response to Comment 7-1

The comment letter from the Big Sur Land Trust focuses on local wildlife corridors, the project's location relative to a regionally significant corridor, and the DEIR's analysis of wildlife corridors.

Section 3.3 has been replaced in its entirety and recirculated within the RDEIR. Please see Master Response 3 regarding the wildlife corridors and the EIR's characterization and analysis of corridors relative to the project.

The description of the parcels on the project site provided on page 2-1 of the DEIR summarizes the general location of the project site. At the time the project description was prepared, the Big Sur Land Trust had not yet purchased Marks Ranch. According to the Big Sur Land Trust's website, Marks Ranch was purchased in partnership with Monterey County Parks and will result in the transfer of 624 acres of the ranch's eastern portion to County Parks as an addition to Toro Park. The project description is sufficient as the general public would be more likely to identify with the location of Toro County Park than with Marks Ranch, and eventually portions of the Marks Ranch will be included within Toro County Park. The information provided is noted for the record.

Comment Letter 8

From: Paul Casey <pcasey2@yahoo.com>
Sent: Friday, November 16, 2012 3:33 PM
To: Mack, David x5096
Subject: Ferrini Ranch Subdivision

To Whom It May Concern,

I am writing this letter opposing the Highway 68 development access to Ferrini Ranch Subdivision. Highway 68 is a scenic route that has and is turning into a freeway at the cost of constant development. I am sure I am speaking for All home owner on Toro area. I have lived in Toro for about 40 years and have seen the over development that has taken away from the quiet and beautiful hills. The traffic noise has increase to the point where it is no longer peaceful. Even with double pane windows, the sound is short of quiet. This has eroded our home values. If the project of building more home, (which it seems that Monterey County has water problems, and difficulty selling home for sale now) Why are building more homes. Why not find another route and not use highway 68. Other options, River Road or San Benancio. Stop light are already in place. Please consider other options.

8-1

Thank you

2.0 RESPONSE TO COMMENTS ON DEIR

RESPONSE TO LETTER #8 – CASEY, PAUL

Response to Comment 8-1

Commenter states general opposition to the project's access along Highway 68, as well as increased traffic, noise, and water problems.

Please see Master Response 1 regarding project access. See also Master Response 1 and Section 4.0 (Alternatives) of the RDEIR regarding noise concerns and additional analysis. The noise information of the RDEIR provides additional detail regarding future noise levels in the area.

Due to topography and other constraints, the entire site cannot be accessed via River Road or San Benancio Road. There are project access points in these locations, but the access is limited to a portion of the project. A primary access along State Route 68 provides access to the majority of the site. Several other project alternatives are explored in Section 4.0 of the DEIR.

Please also refer to Master Response 2 for additional information regarding potential water-related impacts.

Comment Letter 9

Subject: FW: Ferrini project

-----Original Message-----

From: mike cate [<mailto:mcate@sbcglobal.net>]

Sent: Monday, September 17, 2012 10:14 PM

To: Mack, David x5096

Cc: 112-Clerk of the Board Everyone

Subject: Ferrini project

Hello David

My name is Michael Cate and I have lived in Monterey County 55 years.

When I heard that the eastern corridor running along Highway 68, some of the most beautiful pastureland that i have seen with its soft rolling hills, graced with beautiful old oaks, was slated for development I was aghast.

Why allow such a blight to be built, and along one of the main roads into the local area. There is no house or winery that is as beautiful as that verdant landscape. The remaining open land is crucial to the well being of this beautiful county.

Please don't allow such a myopic project mar the land. We all are stewards. The earth needs our support.

Thank you for your attention.

Sincerley

Mike Cate
Carmel, CA
93921

9-1

2.0 RESPONSE TO COMMENTS ON DEIR

RESPONSE TO LETTER #9 – CATE, MIKE

Response to Comment 9-1

Comments express general opposition to developing the project site due to changing aesthetics.

Aesthetics and visual resources are addressed in Section 3.1 of the DEIR. Comments are noted for the record. With respect to project design and aesthetics, the applicant is proposing to dedicate three parcels totaling approximately 600 acres for open space as shown in Figures 2-5a through 2-5e of the DEIR. Many of the areas that are most visible to those traveling along State Route 68 would remain as open space. Implementation of mitigation measure MM 3.1-1b on page 3.1-21 of the DEIR would designate these parcels as scenic and conservation easements.