

February 20, 2008

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Comments on Rancho Canada DEIR

Project Access

The DEIR lists three alternatives for access from Rio Road west: open access, gated access for community members and gated access for emergency access only.

Open or gated resident access would result in significant visual and noise pollution and safety problems. The DEIR doesn't state exactly where the improved road would be situated and should do so. It appears that the current levy would be widened, and elevated approximately 4.5 feet so that it is above the 100-year flood level. Changes in the levy will directly affect Riverwood's hydrology. Please respond with applicable hydrology, seismic and visual studies of the changes and flag and stake the site.

Alan Williams, representing the project, proposed a floodwall in lieu of elevating the levy in a CSA 50 meeting on February 19th. Since this alternative has been proposed as a viable alternative in public meeting by the representative of the developer, the developer should be required to provide an amendment to the DEIR specifications which include seismic and hydrology studies, conformance with government agency flood control recommendations and requirements, visual impacts, exact location including flagging and staking and the comment period appropriately extended.

The DEIR estimates that the project will generate 2,643 daily trips with peak AM traffic of 204 trips per hour and PM traffic 266 trips per hour (table 3.7-10). If Rio Road west were opened to community members the DEIR estimates over 80% (78% incoming, 85% outgoing) of the development's traffic would use the tieback levy and Rio Road west (Appendix D, Figure 7). That would be 2246 trips per day, peak AM 173, peak PM 226. That would be an increase from very close to zero traffic on the tieback levy, which currently serves front entrances for two properties and a back gate for one.

Traffic would make a steep climb from Rio Road onto the levy negotiating a sharp "S" curve a few feet from Riverwood units 84 and 85 with vehicle wheels at or above window level and above patio fences. There is a wide opening, consisting of an emergency access road and landscaping, into the adjacent parking bay. Units 77 to 87 would be directly affected by noise and pollution from autos, trucks, and motorcycles. Fourteen additional units fronting on Rio Road would also suffer a significant increase in noise and pollution.

We do not accept the monitoring results of March 4-6, 2007 (Table 3.9.4) that show noise levels in front of Riverwood (36 to 57 DB) to be higher than levels at Community Church, which is much closer to Carmel Valley Road (44 to 49 DB). We estimate traffic entering the levy would generate 60 to 70 (and occasionally higher) decibels and there would be significant increase in noise along Riverwood's Rio Road frontage. We also note that there is a significant difference between four or five trips a day briefly generating 50 to 60 decibels and a constant stream of 200 cars, trucks and motorcycles per hour.

Please provide noise studies at the levy entrance, in the patios interiors of units 84 and 85. We request that a representative of Riverwood be present to monitor measurement and results.

Because of the severe noise, pollution, and safety impacts of the open access and resident access alternatives, the only mitigation which would allow Riverwood residents to maintain an acceptable quality of life would be adopting the "emergency access only" alternative for Rio Road west.

Construction Traffic

The developer estimates that 7,200 truckloads of dirt will be imported over a period of 28 days resulting in 29 trips per hour. The DEIR doesn't state how much of this traffic would be on the Rio Road west tieback levy, but his representative, Alan Williams stated at the CSA 50 meeting on February 19 that he expects that half the trips would be over the levy. This would be in addition to other construction traffic, which would continue for a much longer period of time. The impact on Riverwood homeowners of large trucks (in any number) passing within a few feet of our units on a narrow sharply curved elevated roadway would not be "less than significant" in respect to noise, safety, exhaust and particulate pollution. These impacts can only be mitigated by requiring all construction traffic to enter and exit the project using Carmel Valley Road and Rio Road east. Please provide documentation of effective mitigation of the impacts resulting from construction traffic.

Visual Impact

We note that visual impact photos ("Block Mass Simulations") in the DEIR are limited to three locations. The project will be visible from many other locations, including from within Riverwood, offices on Carmel Rancho Boulevard, and multiple homes and locations on Val Verde Drive and in Carmel Views, Rancho Rio Vista, and Del Mesa Carmel. Residents of these areas should be apprised of the visual impact the project will have on their views. Please require that the project be flagged and staked and that the comment period be extended so that affected residents will have time to comment.