

LAW OFFICES

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Rancho Canada Village

3 MARCH, 2008

EMAIL TRANSMISSION

To: Jacqueline R. Onciano
Monterey County Resource Management Agency
Planning Department
168 W. Alisal St., 2nd Floor
Salinas, CA 93901

Re: Comments: Rancho Canada Village Specific Plan

Ear Ms. Onciano:

Save Our Peninsula submits the following comments regarding the above referred to project's DEIR and appendices;

1. The environmental assessment and land use determination for this project should be postponed until such time as the County's General Plan and accompanying environmental documents are updated, finalized and certified. The County's General Plan and accompanying Carmel Valley Master Plan are more than twenty years old. The documents were suspect when adopted. With twenty years of build out and impacts to the roadways and water supply, coupled with SWRCB Order 95-10 and TAMC's inability to coordinate traffic mitigation measures with land use approvals, the County is facing a complete breakdown in the ability to provide the most minimum of services. By way of example, the Public Works Department's most recent Pavement Study concluded that the County is facing a back log of the most basic road safety maintenance work exceeding \$100,000,000. Any major development, such as this one, should not be considered until such time as the County General Plan and accompanying environmental documents are updated and legally adopted.

2. The alternative section does not contain a quantitative analysis comparing the impacts of the proposed alternatives with the proposed project.

3. The project description fails to discuss the location of the proposed 200,000 cubic yards of fill moved onto the site or the potential 28 carriage homes discussed at pages 4 and 9.

4. Water.

a. The DEIR indicates that the project would use less water than current demand therefore there is less impact on the aquifer. This does not take into account that current

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use, irrigation of the golf course, results in most, if not all water, going back into the aquifer, thereby recharging it. Under the proposed project, the water used for the project will not recharge the aquifer, therefore there maybe an impact on the on the aquifer. This may be a violation of SWCRB Order 95-10 and County Ordinance 3310.

b. Mitigation measures HYD 1-5 seems spurious, unenforceable and there is no evidence of their effectiveness.

c. Mitigation measures HYD 6 and 7 are spurious, unenforceable and there is no evidence of the mitigation measures' effectiveness. Also, the impacts that these mitigation measures address maybe violations of law, ordinance, or other governmental plan.

d. The water demand calculations seem to be low. What is the evidentiary basis for said determinations?

e. The cumulative and growth inducing impact assessment is inadequate. The DEIR acknowledges significant impact but there is no assessment regarding the impacts associated with providing water to cumulative projects, either in Carmel Valley or Greater Monterey Peninsula area or the impact on Ordinance 3310 or SWRCB Order 3310.

5. Traffic:

a. There is no discussion of the current state of traffic programs that are relied upon to mitigate the impacts with the payment of the fees. An assessment of the programs list of projects, current funding, and timing of build out of proposed projects should be undertaken to determine the viability and effectiveness of the program as a mitigation measure.

b. The traffic demand figures seem to be low.

c. There is no discussion of the conditions of the roads in the project area.

d. The cumulative impact analysis doesn't specify what makes up the cumulative demand calculation.

Save Our Peninsula request the County to consider these comments.

Richard H. Rosenthal
Save Our Peninsula

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SSSSSS

Novo, Mike x5192

From: Richard Rosenthal [RRosenthal62@sbcglobal.net]
Sent: Friday, February 29, 2008 4:40 PM
To: Novo, Mike x5192; Knaster, Alana x5322
Cc: 'Richard H. Rosenthal'
Subject: Rancho Canada Village.doc

Please pass along comment regarding Rancho Village.

Thanks,

RHR

