Reda Rackley
65 Middle Canyon Rd
Carmel Valley Ca 93924

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

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Dear Ms. Onciano,

I am writing as a concerned citizen of Monterey County to voice my objections to the proposed Rancho Canada Village development in the unincorporated area of Carmel Valley. While this project presents an opportunity to promote smart development that would ultimately contribute positively to the local economy and potentially reduce development impacts on the Valley, under the current proposal, the development fails to respond adequately to the inherent biological and qualitative changes it will bring to the river and its associated flora & fauna. Moreover, the current proposal drastically encroaches on the neighboring school site, and, in particular, unnecessarily compromises the parcel of land currently in use as an award-winning environmental education center, the Hilton Bialek Habitat. The Habitat positively affects the lives of over 2,000 Monterey County schoolchildren annually and is home to over 175 species of birds, many small mammals, countless reptiles and insects, and amphibians, including the red-legged frog.

Among the Environmental Goals listed in the executive summary of the draft EIR, more than one of these goals is in flagrant conflict with the actual proposed development:

- ***"Integrate the surrounding native habitats into the open space within the community."*** According to the current plan of the community, there is very little common, park-like space within the layout of the streets that would in any way mimic the surrounding native habitats or provide adequate ecosystem services to any of the wildlife or plant species currently on the land. Furthermore, the proposed development eliminates a significant wildlife corridor between the Carmel River, the Hilton Bialek Habitat, and the open space north of Carmel Valley Road. Numerous studies indicate the importance of corridors of native vegetation to the survival of species. The elimination of such corridors leads to fragmentation of habitat and isolation of species, which impacts long-term survivability, especially of larger species. **NOTE:** **The question of wildlife corridors is not raised anywhere in the draft EIR, and should be considered as a detrimental environmental effect.*

- ***"Create buffer zones around the community that help transition from a native habitat/ecosystem to an urban habitat/ecosystem."*** By the current plans, the RCV ignores this goal entirely. The significant parcel of open space located at the Hilton Bialek Habitat (HBH) is completely ignored as a native habitat/ecosystem. The HBH is used by over 175 species of birds, many small mammals, countless reptiles and insects, and amphibians, including the red-legged frog. The current RCV proposal eliminates mature riparian woodland useful to both wildlife and teachers and students as an important outdoor classroom. Removal of this habitat along the northern border of the RCV development will greatly impact the usability of the Habitat's amphitheater, disrupt long-term avian monitoring data, and generally degrade the visual and experiential aesthetic of the Habitat property.
- ***"Encourage multi-modal transportation opportunities."*** The current layout of RCV in no way attempts to incorporate novel opportunities for pedestrians or cyclists other than conventional sidewalks. Furthermore, the proposed layout of the development restricts access to the river and proposed native habitat open space by school and student groups by failing to provide a safe thoroughfare for children to cross. Without such a thoroughfare, students and teachers cannot safely access the river or the trail system, both of which are regularly accessed under current no-development circumstances.

Among areas of known controversy outlined in the DEIR, the following are significantly downplayed:

- **Visual aesthetics**: the location of the 40 affordable housing condos presents a significant and unacceptable visual and physical encroachment on the Hilton Bialek Habitat property.
- **Hydrology**: the deposition of 200,000 cubic yards of soil below the Carmel Middle School fields will create a berm, effectively preventing the drainage of water from the lower fields of the middle school during heavy rains; these fields are a heavily used community resource, hosting numerous sports teams year-round. Additionally, the disruption of the flood plain up river and downstream has not been adequately addressed.
- **Traffic**: increased traffic poses a risk to school children, particularly in the form of increased tailpipe emissions, which are known to contribute to asthma and developmental problems in young people.
- **Water Supply**: Although RCV represents a net decrease in water usage, it is a permanent and absolute water use. In the case of a golf course, water use can be curtailed or entirely halted during extreme low water years; it is impossible to halt water supply to neighborhoods and homes. Given the current water crisis facing our region, and the state-mandated reduction on pumping to be enforced by 2011, it is irresponsible to allow any additional permanent water fixtures in any area currently serviced by Cal-Am and water from the already depleted Carmel River aquifer.
- **Biological Resources**: the project results in significant impacts to biological resources by eliminating one of the few remaining north-south wildlife corridors in the Valley. Additionally, RCV impacts mature riparian habitat, altering or eliminating it irreversibly.

- **Water Quality**: there is no attempt in the RCV plan to curtail urban run-off pollution, one of the leading sources of contaminants in the Monterey Bay Marine Sanctuary.
- **Operational Noise, Construction Disruption, Operational Air Quality Emissions, Hazards and Hazardous Materials**: The current proposed location of RCV is unnecessarily close to an existing and established school site, and presents unnecessary environmental and health risks to the students, teachers, and staff. In addition, the increased noise and construction disruption will negatively impact the learning abilities of countless students for an undisclosed period of time.
- **Cultural resources**: While archeological remnants are surely present on-site, the openness of the Valley itself and the integrity of the flood plain represent and cultural and biological resource that we have a duty and obligation to protect for future generations.

Among the alternatives considered, as outlined in the DEIR, ***Alternate 2 "East Golf Course" would remedy most of the afore mentioned problems***. By locating the development farther east, above the flood plain and at a considerable distance from the school, the impacts on wildlife, hydrology, and environmental health and quality will be mitigated, and the long-term outcome will benefit a greater number of people who live and work in the area. I strongly urge the county and the developers of this project to consider this alternative.

Thank you for your time.

Sincerely,

Reda Rackley