

March 6, 2008

Jacqueline Onciano
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168 West Alisal St., Second Floor
Salinas, CA 93901-2487

Comments on Rancho Canada Village Specific Plan DEIR

Dear Ms. Onciano, File No. PLN 040061

Observations & Questions

Two key documents, *Lower Carmel River Flood Control Project Final Report, August 9, 2002* and, *Rancho Canada Village Specific Plan, draft EIR of January 2008* and their key references, are not reliable in their findings and recommendations as they used flawed data and/or information picked up from other reference studies and reports. Furthermore, the two studies are disjointed and do not collectively provide a complete picture regarding the overall potential impact of the project on the river. **Combined, these documents do not support the conclusions of the DEIR.**

In addition, key questions /concerns with the reports must be addressed, as follows:

- 1) The RCVSP must comply with the wider Carmel Valley Master Plan.
- 2) An analysis must be made of the increased runoff resulting from the *non-calculated* wider RCVSP footprint for access roads, pathways, parking, play areas, lower maintenance of current greens, etc.
- 3) An analysis must be made of the combined effect of high river flows at the lagoon/estuary area coinciding with an opposing high tidal upstream surge.
- 4) An analysis must be made of the cumulative impact of the RCVSP and other ongoing or planned developments within the Carmel River Valley that collectively impact the potential of flooding, landslides, river erosion and sedimentation.
- 5) A more thorough analysis must be made of the ongoing experience of climate change resulting in indicated longer dry spells and shorter, but heavier rainfall and more severe storms (which indicate that the 100 year records may now be obsolete).
- 6) An analysis must be made of how best to minimise direct runoff to the river by increasing ground percolation to the underlying aquifer system.
- 7) The assumption that the Highway 1 Bridge will act as a buffer when river flows and levels are dangerously high—it was never designed for such use – is misplaced.

Alternatives That Must Be Considered

- 1) Explore as an alternative the developer harvesting runoff water from the RCVSP property, to be used in conjunction with the CalAm/MPWMD Aquifer Storage and Recovery (ASR) project. This could potentially address two key concerns:
 - Minimize the risk of flooding, riverbank erosion and sedimentation from accelerated water run-off into the river due to the RCVSP development;

- Directly contribute to the District's water supply, contributing to compliance with the SWRCB Order 95-10.
- 2) The DEIR must determine if RCVSP, and its subsequent runoff to river, would undermine their overlying right to an equivalent water withdrawal (assuming that the overlying right is based on a calculation of the average annual aquifer recharge potential from rainfall on undeveloped land).
 - 3) Again assuming that the overlying right is based on a calculation of the average annual aquifer recharge potential from rainfall on undeveloped land, the DEIR must determine if: (a) the development must harvest its own water and use it solely for the developed property (and in doing so, possibly forfeit the permit to pump water directly from the aquifer); or (b) require that a water harvesting system be built as part of the development to fully restore all runoff safely and directly into the aquifer.

Code Coordination

The project requires evaluation based upon several codes. Therefore, it is essential that the evaluation process:

- Is appropriately planned and coordinated both within and across related fields to facilitate efficiency and effectiveness in key decision making by all stakeholders in planning, permit requirements, development, etc.;
- Follow approved guiding principles, study protocols and methodologies;
- Ensure verification of critical data / information;
- Have quality assurance mechanisms for cross-referencing and verification of all end products to ensure that critical data and information covering a broad spectrum of issues from environment to economic to human safety has properly been analyzed.

No such cross code coordination and evaluation is presented in the DEIR.

Because no attention has been paid to code coordination and evaluation, the DEIR and the project itself is not coherent, its quality is compromised and key assumptions, fundamental calculations and other key decisions have been based upon flawed data and information taken from one study and used in others – therefore contributing to an amplification of flaws across several documents.

The DEIR is not sufficient in significant particulars: it does not properly evaluate the environmental impacts of the project, it fails to mitigate properly those impacts noted and it fails to address code requirements and restrictions that impact the project. This flawed document should be withdrawn.

Respectfully,
John Dalessio

Chairman, Carmel River Advisory Committee*

(A standing Committee of the Monterey Peninsula Water Management District)

*For Identification Only

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From: John Dalessio [dalessio@mbay.net]
Sent: Friday, March 07, 2008 10:46 AM
To: Onciano, Jacqueline x5193
Subject: DEIR RCV 3.08



DEIR RCV 3.08.doc
(43 KB)

Dear Ms. Onciano:
Attached, are my comments concerning Rancho Canada Village.
Please acknowledge receipt of this document.
Regards, John Dalessio

