

Carmel Valley Association
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*"To preserve, protect and defend the natural beauty and resources of Carmel Valley
and the County of Monterey"*

May 17, 2004

The Honorable John Wilmot, Chair
Monterey County Planning Commission
Salinas, California

Via hand delivery

Dear Chair Wilmot and Members of the Planning Commission,

This letter regards the newly proposed housing subdivision at Rancho Canada in Carmel Valley. The Carmel Valley Association, along with the rest of our community, has been asked to provide initial concerns, comments and questions to the County on this project. Please note that since the Rancho Canada application is not yet complete and since the documents which are available have only been available to the public for a few days, our comments below are decidedly initial in nature; we will provide more detailed comments upon review of the full application and accompanying reports once that information is complete.

The Carmel Valley Association is the oldest and largest residents association in Carmel Valley. Established in 1949, CVA currently has approximately 800 dues-paying members.

There are several attractive features in the proposed project, including the commitment to affordable and workforce housing, and a generally attractive design. CVA has long advocated greater affordable housing in Carmel Valley and Monterey County. However, given often unique and potentially insurmountable problems associated with the Rancho Canada proposal, we are not convinced that this particular project is in the best interests of our community in spite of these positive attributes.

Our concerns fall into four general categories: rural character, health & safety, environmental impacts, and administrative issues.

RURAL CHARACTER

The #1 goal of the Carmel Valley Master Plan is "[t]o preserve the rural character of Carmel Valley." We question whether a project of this size and density, built

primarily in the floodplain of the Carmel River, with likely significant traffic and environmental impacts, could ever be consistent with preserving Carmel Valley's rural character. We note that this project would not even be possible under the draft General Plan, as currently constituted, because it would fall outside of the Rural Center area.

Size. CVA is concerned about the sheer size of the project. For good reasons, there is currently a subdivision moratorium in Carmel Valley. County staff has testified that the practical effect of infrastructural deficiencies – primarily substandard LOS on Carmel Valley roads – will be the continued severe limitation of subdivisions for the 20-year life of the next General Plan. Yet Rancho Canada proposes a 280-unit subdivision (with additional and undefined “accessory units”) at the mouth of our very small valley. A proposal of this magnitude appears utterly incompatible with the realities of Carmel Valley and with the planning goal of rural preservation.

Density. CVA recognizes that higher densities in ‘infill development’ are desirable. However, Rancho Canada's is not a proposal for infill development, as it seeks to pave over currently open spaces to the east of the urbanized portion of the mouth. The proposal seems more consistent with urban sprawl than infill development. And it does so at a high density rate. By comparison, Carmel Valley's last major subdivision, Rancho San Carlos, was approved for 350 homes on 20,000 acres (57 acres per home), while Rancho Canada seeks a density 228 times greater (quarter acre per unit). In reality, of course, the density is even greater: by excluding the 36 acres immediately adjacent to Carmel River and unbuildable, the density at Rancho Canada is 456 times greater than at RSC, with a average of 1/8th of an acre per unit. This will be cheek-by-jowl housing.

Traffic. Carmel Valley Road has for years been one of the most congested roads in Monterey County. The new climbing lane on Highway 1 has relieved some of this congestion, but only on a temporary basis. And the climbing lane was specifically approved as a “no growth inducing” project to make up for the past backlog, not to pave the way for more development. CVA estimates that the already-approved projects and undeveloped legal lots of record in the greater Carmel Valley will generate over 5 million new car trips per year as they are built out. A brief glance at the Rancho Canada traffic report does not inspire confidence as to its credibility; finding that a 280-unit subdivision will generate almost no new net traffic is not credible. Public works estimates 10 car trips per unit per day for residential development, or 2,800 in this case. Nick Lombardo told CVA in a presentation that the initial traffic study found an increase of 2,000 car trips per day; where have all these car trips gone in the intervening months? The traffic study appears to assume that the traffic from all golfers on the second course (to be closed) will simply disappear from Carmel Valley roads. How many of those golfers will still come to Rancho Canada but play on the remaining (expanded) golf course? How many will continue down Carmel Valley Road to other golf courses here, for example at Quail or Carmel Valley Ranch (each just a few minutes drive away)? In short, it is not credible to assume that the golfers on the course to be closed will all simply disappear from Carmel Valley roads. Nor do we find it a credible assumption that most residents at Rancho Canada will walk to their grocery and other

shopping. It is approximately one mile each way from the center of the proposed development to both Safeway and Albertsons; we doubt very many people will choose to walk two miles and will instead get in their cars for the short trip. No traffic analysis at all was done for the undefined "accessory units".

In short, the traffic analyst seems to have accepted at face value the most rosy assumptions promoted by the developer, many of which appear to break down under a minimum of scrutiny.

Flood Plain. Most of our concerns about building in the flood plain are discussed below under health & safety, but we need to make an obvious point here: paving over 36 acres of open space (yes, even open space used for golf) on the banks of Carmel River is simply inconsistent with preserving the rural character of Carmel Valley.

HEALTH AND SAFETY

CVA believes there may be serious health and safety issues that need to be addressed and mitigated. Many of these potential problems are directly linked to building in the flood plain and floodway.

Flood Plain. If we read the applicant's proposal correctly, 60 of the 72 total acres are located within the 100-year flood plain, including 24 of the 36 acres where the homes are to be built. In order to raise those 24 acres to just above flood level, an enormous amount of fill will be needed (200,000 cubic yards according to the CVLUAC agenda for May 17; 100,000 according to the applicant's proposal). We understand that the fill is to come from both sides of the Carmel River, including dug from the lands designated for a park. As you know, severe floods appear to be occurring more often, perhaps due to global warming; we have had two major floods in just the past decade (1995, 1998). Deliberately placing 280 families in harm's way for the next flood strikes us as irresponsible in the extreme. What is perhaps even worse is the potential impact on hundreds of residents downstream from Rancho Canada. Filling in 24 acres of flood plain will worsen flooding downstream by diminishing the surface area of the flood plain at Rancho Canada. The now narrower passage with higher banks will simply shift water accumulation downstream, worsening the flood potential in residential communities such as Riverwood, Arroyo Carmel and Mission Fields, as well as the commercial districts of the Crossroads, Carmel Rancho and the Barnyard. Moreover, downstream flooding will be further exacerbated by the fact that 36 acres of currently permeable land will be made impermeable with this development, creating more water runoff and less water absorption capacity. In addition, with the narrowing of the water passage at Rancho Canada, an initial flood surge will likely lead to a temporary backup of water immediately upstream as well, exacerbating flooding at Hacienda Carmel and nearby residences.

Potable Water. A related public health issue concerns water potability. The well Rancho Canada proposes to use to service the subdivision is situated in the current golf course area. Given the plentiful chemicals used in golf course maintenance, we are

concerned that the local groundwater may have been exposed to pollutant seepage. This can and should be easily tested and monitored.

Earthquake Safety. The application notes the proximity of two nearby earthquake faults. Building homes on fill is extremely dangerous in areas subject to earthquakes as such soil liquefies easily during an earthquake. The result is a high level of damage and destruction to such structures, and greater mortality rates among their inhabitants.

ENVIRONMENTAL IMPACTS

In the absence of an environmental study, we can only speculate about potential impacts from the proposed project. We look forward to a truly rigorous and thorough environmental impact report, and we reserve the right to comment on those environmental impacts as they become known. We expect that such a large project in an environmentally sensitive area along the Carmel River will have a significant number of environmental impacts. We are especially concerned about the impacts from digging out 200,000 cubic yards of dirt right next to the Carmel River. As we understand, this fill is to be taken from both the north side of Carmel River and the south side at the Odella East field. We hope Supervisor Lou Calcagno was prescient when he was recently quoted, addressing a different (illegal) development, that “The county would never allow someone to go through a wetland corridor with a bulldozer with a 12-foot blade” (Herald, May 9, 2004, p. A9). We assume that the size of the actual blade was not the point of his comment.

ADMINISTRATIVE CONCERNS

CVA has a number of concerns that may broadly be deemed administrative in nature. These concerns include the Specific Plan, the Park, the CUSD boundary area, alternative affordable housing projects, and, especially, the need to study the cumulative impact of development at the mouth of Carmel Valley.

Specific Plan. The applicant is requesting that a Specific Plan be used to govern the Rancho Canada development. While Specific Plans are fine in theory, our experience with Specific Plans in Carmel Valley has not been positive. In particular, we have seen that the Specific Plan implemented at Carmel Valley Ranch has in reality constituted an invitation to abuse and escape the planning process with little or no accountability. CVA has no interest in seeing such a mistake repeated.

Park. The applicant intends to convert an unbuildable 36 acres next to Carmel River into a park. However, there do not appear to be any financial resources dedicated to maintaining the park in the future. Without such dedicated funding, a park cannot reasonably be expected to survive. Moreover, it appears that the 200,000 cubic yards of fill used to raise the housing site above the floodplain will be taken, in part, from this parkland, thereby stretching the common understanding of what constitutes a public park to include very large gravel pits.

CUSD Boundary. During Mr. Lombardo’s presentation to CVA, board members suggested that the CV Master Plan area be used as the boundary area for affordable

housing applicants (but to include Carmel High and River School employees as well). Using the CVMP boundary instead of the CUSD boundary will lessen the traffic impact of the major bottleneck in Carmel Valley: leaving the valley north on Highway 1. Using the CVMP area (plus CHS and River) will keep Carmel Valley employees housed in Carmel Valley. We are disappointed to see that this practical suggestion was not adopted by the applicant.

Alternatives and Need. CVA has asked County staff to estimate how many of the 1200 jobs in the CVMP area would qualify for affordable and workforce housing. Having such data in hand would help guide us in effectively planning for such housing. To date, we have not heard back from County staff on our request. Nor does the applicant provide data on the actual need. We all know and accept that a need exists; however, we would like to have better (some?) data on what the specific need is in our community. With this in mind, we note that there is a 100% affordable housing proposal that is also “in the pipeline” at the mouth of Carmel Valley, that is not located in the flood plain, and will likely have fewer environmental and traffic impacts than the project proposed for Rancho Canada. In short, there may already be a better alternative to address the affordable housing need in the CVMP area – a need that should in any case be supported by hard data.

Cumulative Impact. CVA is on record as seeking a halt to development at the mouth of Carmel Valley until the cumulative impact of these developments is studied. As you know, there are significant development pressures and proposed projects at the mouth of Carmel Valley, with most in the flood plain. We ought not tolerate piecemeal development that may have merit on an individual basis but that, cumulatively, ends up posing serious health, safety, traffic, and other quality of life risks. CVA believes that now would be an excellent moment for Monterey County to undertake just such a study on the cumulative impacts of development at the mouth of Carmel Valley.

As we noted at the outset of this letter, these are initial concerns and comments based on a rapid initial review of the application and, of course, long-standing CVA policies and concerns. We look forward to studying the completed application and supporting documentation, and will provide more detailed comments at that time. One final comment is in order given political developments in Carmel Valley. It is highly likely that during 2005 voters in Carmel Valley will be voting on whether or not to incorporate. A successful petition drive, already certified by LAFCO, means that a formal process leading to a vote is now underway. Given the upcoming vote, we believe the County currently ought take no action on large projects that have the potential to significantly impact Carmel Valley until the outcome of that vote is known. If the people of Carmel Valley decide to incorporate, they ought to be the people to make such land use decisions and be held accountable for those decisions in a democratic manner. We are not advocating for a halt to the planning process in Carmel Valley, only for a self-imposed injunction on taking decisions on a small handful of large projects that have the potential to irrevocably change Carmel Valley – at least until the democratic wish of the voters is known.

Thank you for your consideration of these matters.

Sincerely,

Glenn E. Robinson
President

Cc: Carmel Valley Land Use Advisory Committee
Dave Potter, Fifth District Supervisor