

**Carmel Valley Association**  
P.O. Box 157, Carmel Valley, California 93924  
*www.carmelvalleyassociation.org*



Since 1949

May 9, 2005

Alana Knaster  
Planning and Building Inspection  
Monterey County  
PO Box 1208  
Salinas, CA 93902

**Re: Rancho Canada Subdivision  
Inconsistencies with CVMP  
PLN040061**

Dear Ms. Knaster,

The Carmel Valley Association (CVA) is the largest and oldest residents association in the greater Carmel Valley and, as such, we have a special duty in protecting the interests of our community. We have taken great pride over the years in our efforts to see that the Carmel Valley Master Plan (CVMP) is adhered to by Monterey County. It is with this responsibility in mind that we submit this letter for your consideration. We believe the proposed Rancho Canada subdivision is inconsistent with the CVMP on a number of issues, that potentially false representations are made by the applicant with regard to the consistency issue, and that there are numerous remaining unanswered questions that need attention prior to this application moving forward. Allow me to summarize the issues as follows:

**Findings noted in the application on CVMP consistency, and comments:**

6.1.3 Beneficial uses of water and 6.11.4 Management of Carmel River water

Comment: Finding is that the project will enhance beneficial uses and result in a decrease in water demand. Question: will Rancho Canada give up its rights for the 80 acre feet?

6.1.5 Water reclamation, conservation and new source production.

Comment: The finding is that conservation is a direct consequences of a reduction of water use. Changing land use is not conservation. Conservation would include measures beyond those already required, e.g., capturing runoff for irrigation. The project would increase wastewater available for reclamation to irrigate PB golf courses!

7.1.1.1 Preservation of areas of biological significance.

Comment: Not sure how a finding can be made without the identification of those areas, particularly in relationship to the 220,000 yds of dirt for cut/fill.

7.1.1.2 Preservation of areas of critical habitat for rare and endangered species

Comment: Not sure how a finding can be made without the identification of those areas. What about the redlegged frog, impact of cut/fill?

7.1.3 Project sited to protect riparian vegetation.

Comment: Does the proposed finding account for cut/fill?

16.2.6.1 Flood control include restoration of river.

Comment: Will project restore River bank east of project near the Hacienda homes? Will flood control account for potential failure of bridge to Hacienda homes and potential downstream impacts?

26.1.21 Maintain rural character

Comment: This many units at the proposed density regardless of whether or not it is visible is simply not rural.

26.1.22 No further development shall be considered until a demonstrated need.

Comment: Proposed finding says a need has been demonstrated through GP hearing process. There is sufficient land on a countywide basis to address affordable housing needs without this project.

26.1.22 Open spaces to be located to maintain distinction between more rural and more suburban areas of valley.

Comment: The open space that should address this policy is just east of Brinton's. Using the reasoning provided in the proposed findings would allow suburban uses all the way down the Valley, i.e., urban sprawl.

26.1.33 Consistency of project with CV Master Plan

Comment: As noted, the proposed project would require amendments to make the project consistent. The project should be found to be inconsistent with the CVMP.

27.3.5 Requires projects to be consistent with buildable lots of records, etc.

Comment: The proposed findings says the project is consistent. The data on the number remaining from existing lots of record plus 738 has been requested by the LUAC and never provided. Without that information a finding cannot be made.

27.3.10 Allowable development should be permitted to be located on the most appropriate portion of the property.

Comment: The proposed finding states that the project is outside the floodway. If it is outside the floodway, why the cut/fill?

28.1.26 The County shall encourage overall land use patterns which reduce the need to travel.

Comment: The proposed project does not reduce the need to travel. It is one mile from the project's center to both Albertson's and Safeway, considerably more than the ¼ mile people will typically walk. Transit is typically not viable, and the project has not proposed providing operational funding for MST. The project does not provide for mixed uses.

39.1.6 Construction of Hatton Canyon Freeway - "If the Freeway has not been built, the Board shall limit further development until the freeway is under construction."

Comment: Proposed findings find the project consistent with this policy. It is not.

**Applicable policies not included:**

3.1.5 "The amount of land cleared at any one time shall be limited to the area that can be developed during one construction season.

4.2.5 "All developments should consider establishing community gardens and orchards, and, where appropriate, should site them to enhance the visual character of the Valley...."

7.1.3 "Development shall be sited to protect riparian vegetation, minimize erosion and preserve the visual aspects of the river...In places where the riparian vegetation no longer exists, it should be planted to a width of 150 feet from the river bank...".

7.1.4 "River bed and bank management by private property owners shall preserve the natural state of the Carmel River...".

7.2.1.2 "In new development, the potential for impact on rare and endangered species shall be assessed..."

9.1.2.2 "Open space areas should include a diversity of habitats with special protection given areas where one habitat grades into another..."

16.2.13 "New development projects are required to pay fees for construction of downstream drainage improvements..."

26.1.25 "The visible alteration of natural landforms caused by cutting, filling, grading...shall be minimized through sensitive siting..."

26.2.26 "Development either shall be visually compatible with the character of the valley and immediate surrounding areas or shall enhance the quality of areas that have been degraded by existing development."

26.1.34 "The maximum density allowable according to the slope/density formula and the maximum density allowable according to other plan policies should be compared. Whichever of the two densities is the lesser shall be established as the maximum density allowable under this plan."

I thank you in advance for your consideration of these questions and comments. I look forward to your detailed response.

Sincerely,



Glenn E. Robinson  
President  
Carmel Valley Association

Cc: Jacqueline Onciano