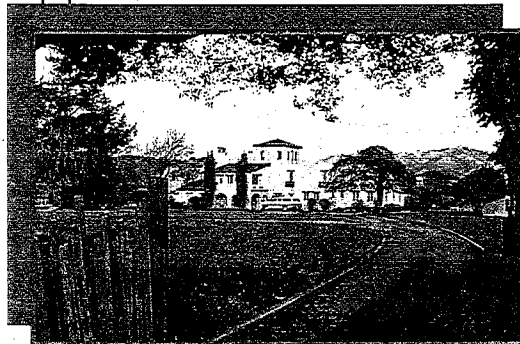


Santa Lucia Preserve Project

Final Environmental Impact Report Volume III: Additional Responses to Comments



Submitted to:

**Monterey County
Planning and Building
Inspection Department
Salinas, California**

Submitted by:



**Jones & Stokes Associates, Inc.
Sacramento, California**

September 22, 1995

**Santa Lucia Preserve Project
Final
Environmental Impact Report**

Volume III: Additional Response to Comments

Assigned EIR No. 94-005
Planning Commission No. PC94067 (SCH 94083019)
Planning Commission No. PC94218 (SCH 95023036)

Project Applicant:

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September 22, 1995

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Additional Comments Received and Responses

This volume (Volume III) of the final environmental impact report (EIR) includes additional comment letters that require responses, which are not provided in Volume I. The letters of the following individuals are included and responses provided:

- Michael H. Dormody (July 7, 1995),
- Michael H. and Donna Dormody (July 6, 1995),
- Bobbie Harms (undated), and
- Kim Forrest (May 31, 1995).

MICHAEL H. DORMODY
35425 DORMODY ROAD
CARMEL, CA., 93923

July 7, 1995

LETTER OF TRANSMITTAL:

Wanda Hickman
Monterey County Planning Dept.
240 Church St., North Wing, Suite 116
Salinas, CA., 93901

Dear Ms. Hickman:

Enclosed is our reply to the Draft EIR Report on the Santa Lucia Preserve Project.

We request the following topics be included in our reply. Property Taxes, Income Taxes, State Franchise Taxes generated by the project have not been addressed in the DEIR.

Will property taxes on the land of the project be reduced if 80% of the property is dedicated to the Preserve?

Will purchasers of estate parcels (openlands) receive deductions in individual IRS returns if they dedicate portions of their property to the Preserve?

Will the dedication of these lands to the Preserve cause the various taxing agencies to lose revenue?

How will other property in the area be effected by the increase/decrease land value of San Carlos Ranch or Santa Lucia Preserve?

Will adjoining properties and private parcels within the perimeter of the Santa Lucia Preserve be included in special assessment districts and service areas which could be formed by government agencies? If so would they be required to pay additional taxes on their land?

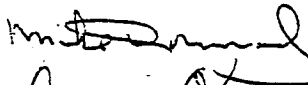
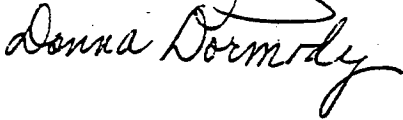
Is tax revenue generated by the improvements on the land of the Santa Lucia Preserve enough to offset the additional costs of police, fire protection, schools, public road maintenance and other services provided by Monterey County?

This information must be provided in the EIR before proper mitigation can be proposed. Prepare a document that will examine the effects of this project on County, State and Federal Tax revenue.

Would you please notify us immediately if a last minute extension to the deadline of July 7, 1995, is granted.

Thank you.

Mike & Donna Dormody

Response to Comments from Michael Dormody (July 7, 1995)

1. The commenter is requesting additional information on tax revenue. The California Environmental Quality Act (CEQA) does not require that this information be provided in an EIR.

MICHAEL H. & DONNA DORMODY
35425 DORMODY ROAD
CARMEL, CA., 93923
408-659-2111
408-659-5934 FAX #

July 6, 1995

San Clemente Rancho's, Donna and Mike Dormody's answers and comments to the Draft EIR of the Santa Lucia Preserve.

Opening Comment. We take exception with the statement S -16 (area of known controversy) that the "adjoining landowner who rents cabins and believes the project would have an adverse effect on his rental business". The fact is the adjoining property owner does not "rent cabins". If the property owner had been allowed to meet with the EIR contractor as requested several times, even to the point of retaining an attorney, to arrange a meeting, many of our major concerns could have been pointed out, discussed and mitigated at that time. Since Monterey County's staff have successfully prevented this meeting much time and money has been wasted with more to come. This must be addressed and corrected in the EIR. Why were we not allowed to meet with the contractor?

1

Our property, for the last thirty five years, has been dedicated in perpetuity to wilderness recreation, and will remain so unless condemned, or we are forced out by lack of water. We do not feel the Santa Lucia Preserve project with its many commercial facilities, service station, hotel, sewage treatment plant, golf course, quarries, and 16 1/2 acres of heavy commercial zoning on Robinson Canyon Road (a scenic county road) is in keeping with the General Plan of Monterey County. 350 Estate houses with approximately 150 of them east of Upper Robinson Canyon Road must be considered urban sprawl. It is not necessary to place of every type of revenue producing activity that the developer can come up with in such a sensitive area. The draft EIR does not recognize the 100 families who have invested several millions of dollars over the past thirty five years for mountain wilderness cabins which they own and are placed on licensed property known as San Clemente Rancho. The families invested this money for a safe and inspiring outdoor wilderness experience for their children to grow up in. All of these families pay taxes for their cabins to Monterey County. The Robinson Canyon / Dormody Road drive with its unique abundant wildlife viewing will be destroyed with this "planned community". This

2

significant impact must be addressed in the EIR and unsightly, incompatible facilities must be relocated to be out of sight of scenic Robinson Canyon Road and Dormody Road to reduce the level of impact to insignificant. 2

Discuss why the viewshed of Dormody Road is not covered in the EIR? Why does the viewshed of 100 families, and their guests have no impact? Explain in full this reasoning? 20,000 acres have more than enough areas to relocate these structures. To mitigate by merely moving these structures back a short distance from scenic views is not effective. They must be moved back and out of sight. Then mitigation has been accomplished. Why is this alternative not addressed in the DEIR? At the present the majority of these buildings are placed in view of the public road and very few are placed in view of the preserve residents. This is not equitable. Page 12-1 of the DEIR shows the northern portion of Robinson Canyon Road (which is in the canyon bottom) as the Scenic portion of the Road. This is not correct. The entire road is Scenic with the southern portion having the expansive views. Many of these views in the southern portion will be destroyed with this development. Discuss setbacks in more detail. Provide more legible maps for review. Why is the Scenic Road Designation not covered in more detail? The draft EIR maps are too small for detail. The structures that are intrusive to the view should be hidden by moving them to other areas of the Ranch. 3

Page 3-12. Potential impact with adjacent property. San Clemente Rancho has historic hunting rights on Long Ridge. One of the proposed building sites (234) is only 137 feet from the property line. Several others (240 - 241 - 233) are less than 400 feet. The EIR is incorrect in saying this is considered a less than significant impact. Setbacks must be imposed for ALL building sites with the adjacent landowner so we will not be in violation of the law - hunting too close to a dwelling. If Fish and Game and State law require a 150 yard distance than it must be at least that distance. This must be further addressed in the EIR, and the adjoining property owner must not be penalized by structures being placed too close to his property line. The noise from shooting and target practice in this area must be fully addressed and the historic rights of the adjoining neighbor must not be jeopardized. 4

Traffic on Robinson Canyon Road. Page 13 -38 With the establishment of 150 +/- estate homes, employee housing, golf course and club house, etc., and with the service center, sports center, commercial and hotel located west of Robinson Canyon Road, the DEIR is in error to state the traffic impact to Robinson Canyon Road would be reduced to less 5

than significant. Merely by improving Rancho San Carlos Road and making it more attractive is unrealistic. Cross traffic has not been addressed. Cross traffic would create a dangerous impact on Robinson Canyon Road. No one wishing to travel to Farm Center, Carmel Valley village or Salinas and Highway 101 would drive over fifteen miles out of their way just because it is a more improved road. In fact, the speed limit of 35 miles an hour for Rancho San Carlos Road is much slower than Robinson Canyon Road's 55 mile an hour speed limit. Robinson Canyon Road would be much faster but much more dangerous. How will speed limits be enforced? Twenty one gates will be located on Robinson Canyon Road. Cross traffic from these accesses must be addressed and must be fully evaluated in the EIR.

The DEIR states there will be no impact to traffic on Robinson Canyon Road from Carmel Valley Road to Pinon Peak Road, as the project ends at Pinon Peak Road. So What! These residents will all be using this County Road and the northern portion (five miles) is the most dangerous. The entire length of Robinson Canyon Road must be addressed in detail and mitigated for this project.

The majority of employee housing will be fronting on or have access to Robinson Canyon Road. Some of these locations are over a mile south or north of the gated area where these employees will work. With shift changes, travel to the Ranch Center (Company Store) and employee recreational area, traffic will increase significantly on Robinson Canyon Road. To mitigate there must be a frontage road for employees to keep the commute traffic off Robinson Canyon Road. Note: There are already several Ranch roads that are in existence paralleling Robinson Canyon Road in most spots.

The DEIR has not addressed the legality of barring use of Robinson Canyon Road. A licensed driver can't be kept off public roadways. Physical restraints are the only workable solution. The whole issue of usage on Robinson Canyon Road must be further addressed in depth.

To mitigate to less than significant, physical solutions such as rustic country style bridges, vehicle sized culverts or underpasses must be placed on Robinson Canyon Road to keep Preserve traffic on the Preserve. Unmanned electronic gates would not be practical or effective for safety and security. We presently have a mutually owned electronic gate with Rancho San Carlos and during stormy, windy periods, electrical outages, and mechanical problems the gate becomes inoperable.

If the traffic impact is to be reduced to less than significant these measures must imposed. Traffic counters could be installed to monitor

Robinson Canyon Road travel. If the traffic count changes, all construction must stop until these improvements are installed or keep all development to the west of Robinson Canyon Road.

Robinson Canyon Road must be widened and straightened to accommodate the extra traffic generated by sightseers, delivery and construction traffic if the impact is reduced to less than significant. Currently it is only twelve feet wide in several places with straight drop offs on the canyon edge, and has one way bridges, and narrow cattle guards. This road is dangerous enough without further added traffic. There will be thirteen new inter ranch and private driveway crossings and entrances to Robinson Canyon Road. This must be further addressed in the EIR. Provide detailed maps of Robinson Canyon Road and indicate dangerous areas over the entire length. Show areas that must be mitigated. Designate who will be the responsible party - Monterey County or the developer - in making this entire road safe? Describe in detail what the adverse effect will be on the Scenic designation if Robinson Canyon Road is widened and straightened to a safe standard for all traffic and emergency vehicles? Robinson Canyon Road must be made wide enough to accommodate fire trucks and heavy construction trucks without jeopardizing the safety of on coming traffic? This must be addressed in the EIR.

Bicycle traffic has not been addressed in the DEIR. Robinson Canyon Road has become very popular to bicyclers. With the narrow drop-offs, blind corners and very steep grades out of control bicycle riders are already a hazard on this roadway. Bicycle accidents are quite frequent. The EIR must discuss this problem and its potential to increase with added traffic from the development and its residents.

Page 13-35 & 36. The intersection of Carmel Valley Road and Rancho San Carlos Road. An underpass must be provided at this intersection to make it safe for the established residents of Carmel Valley. Stop lights would be an additional inconvenience to present residents. The families on Rancho San Carlos Road near Carmel Valley Road would never be able to get out of their driveways if stoplights or left hand turn lanes were installed, as traffic would be backed up several hundred yards on Rancho San Carlos Road. Decelerating and accelerating left hand turn lanes are very dangerous. There are too many on Carmel Valley Road as it is. These turn lanes are never wide enough or long enough to make a turn in either direction safely into high speed traffic. Merely by donating money to a highway fund which might never be built can not reduce any impact to less than significant. This statement applies to Carmel Valley Road and Highway 1 intersection as well. No additional traffic should be allowed to be generated at

these points until the improvements are made. Carmel Valley Road reached its capacity in many sections several years ago. A tunnel must be given full evaluation in the EIR comparing its effectiveness with the highly successful tunnel installed for Carmel Valley Ranch at Farm Center.

Page 13-30 Trip generation figures are purely speculative. Traffic generated by estate housing will be more frequent than the developer predicts. The EIR must thoroughly clarify how many dwellings are on each building site. The present plan shows each site can include a caretakers house, guest house, senior citizen house besides the main house. Each one of these units will generate additional traffic which has not been included in the traffic computations. Compounds must be clarified? How many families make up a compound? Tenants including month to month tenants must be included? Number of caretakers and size of their families has not been addressed. More accurate information on numbers must be provided in the EIR.

Total numbers of employees has been vastly been underestimated. The Carmel Valley Ranch has a full service 100 room hotel and golf course. The hotel employs 150 people for an eight hour day. The Preserve's 110 unit lodge plus a 40 unit hacienda should have at least 75 more or 225 for the same eight hour shift. Many of these positions have to be staffed by three shifts - twenty four hours a day. The entire number of employees must be calculated more realistically to have more accurate data for water and traffic impact decisions. Provide more accurate numbers to evaluate the EIR impacts properly.

Water. Section 8

The Monterey Peninsula has a critical water shortage. Residents and taxpayers are facing a bond election to build a new dam on Carmel River. They will pay over 200 million dollars to protect the Carmel River flow, its endangered steelhead fisheries and to assure an adequate water supply to their homes in time of drought. To allow the development to remove water from the upstream watershed, for a hotel, golf course, lodge and community service area is very poor planning and will cause a significant impact to the water supply downstream. To mitigate, the developer must contribute to de-sal and use that water for his project. The full impact of any reduction in run off to Carmel River must receive more third party review. The developer exchanging water from desal for other water alternatives has to be fully reviewed and commented on in the EIR. This must be included.

A layman reading the water report in the draft EIR can only find double talk and assumptions that there is enough water to accommodate the proposed development. Potential effects to off site properties downstream is more vague. Drilling up to fifty more wells to attempt to establish enough sustainable water for buildout of the project would drain additional water from downstream fisheries, wildlife habitats, flora and human needs. The draft does not have enough tangible hydrological reports that state there will be no impact on adjoining downstream properties. The additional draining through pumping of the San Clemente Creek in drought periods will have disastrous effects on the entire watershed. Transferring water from one watershed to another will only result in changing the natural balance of water in all the watersheds. This must be further addressed in the EIR by a third party reviewer. 17

8-49 In times of drought the release of a total of thirty gpm to sustain the pooling and flow in the major tributaries is unrealistic. This extremely low estimate has not been proven effective. Release for creek flow should be based on creek's need and not the amount of extra storage the project would have to complete these releases. If well pumping is continued while release flow is in effect, nothing is accomplished. To mitigate flow in all five creeks, all pumping must be curtailed during times of minimum flow and release must be increased until minimum flow is stabilized. Unproven water should be supplemented by contributions to de-sal project, and exchanging that water with an equal amount from Cal-Am. NO wells should be allowed within 1000 feet of any creek, and ALL casing must be sealed to a depth of not less than 300 feet thus assuring only deep fractured rock water is pumped. Presently, many of the new wells are only sealed to a depth of fifty feet. This is not deep fractured rock water. These casings must also be sealed to three hundred feet. Much more expert analysis is needed by a third party reviewer to make this topic more accurate. 18

Page 8-49 states San Clemente Creek may be ignored in the defined baseflow records. The report does not explain why they are to be ignored when there can be no adverse effect to adjoining property owners. NOTE: San Clemente Creek flows over 4 miles through adjoining properties. This flow can't be impeded by upstream pumping. The adjoining property owner has spent thirty five years nurturing the endangered Carmel River steelhead and creating the area's best trout fisheries. Protection of these resources must be further addressed and mitigation measures must be implemented to reduce the potential impact 19

to less than significant. Off balancing the eco system by pumping water for one watershed to another for forty rounds a day maximum to play golf and destroy an extremely unique area is ridiculous. This cost benefit ratio must be further addressed in the EIR.

Page 8-59 states the Cattle Grazing plan is expected to largely offset the increased consumptive groundwater by the project. This again is in direct contradiction to 8-55 where it states "it is difficult to estimate with certainty the magnitude of the beneficial effect of the Cattle Grazing Plan".

Page 7-4 Controlled livestock grazing currently implemented has NOT reduced erosion in the gullies of the golf course area. This drainage still muddies up faster than ungrazed areas and always has. To mitigate, the cattle must be removed out of this sensitive area and remove the golf course. It is a wetland! Photographic evidence is available to substantiate this statement. In depth review of a third party must be obtained. The Cattle Grazing plan can not be used in mitigation. This must be addressed in the EIR.

Page 8 - 49-50 Discharge of warm water into Creeks which support cold water fisheries could cause a severe impact on this resource. The use of water from Moore's Lake, stock ponds, and treatment ponds will effect these creeks water temperature. This impact must be given more study and mitigation must be sought to off set this severe impact.

Page 8-49 Pine Creek is not a suitable location for base data to compare with San Clemente Creek. It does not have the vast redwood groves, does not have similar rainfall, and has a different climate. It should not be used in the EIR.

Page 8-55 clearly states the Cattle Grazing Plan is uncertain, yet the plan is referred to in many mitigation measures. A plan that has not been proven and is uncertain should not be used for any mitigating measures. The printed references to the DEIR on the grazing plan states they were developed in Texas. This is not a comparable area, for there are no similarities with topography, climate or soils with Rancho San Carlos and Texas. Therefore this plan should not be used as a mitigating factor. This must be further investigated in the EIR and alternative conservation measure found, no golf course, or relocate golf course to a less sensitive area. A location which demands less water, with a cooler climate and would have a lower impact on traffic. The Potero Canyon is ideally suited for this.

Page 8-48 To monitor the Creeks once a year in the month of September is not practical. The peak of the dry month's could be August of one year and November the following year. If you wait five years to evaluate the data of base flow, buildout of the major facilities could be completed. It would be too late to turn back the problem. To mitigate, the developer should be required to contribute to de-sal and take no water from less than 300 foot depth. 25

Page 8-60 states the use of ground water over overlying lands is consistent with water rights law. This has not been proven as water will be taken from one drainage and used in another. Well #E 3 rated at 65 gpm is not deep water but surface water and backflow from Moore's Lake. This particular well should not be used in the available water data until a State water right's decision is made. Whether or not the full allotment allowed is 65 gallons per minute must be determined. There are no historical records which justify this amount of water was ever pumped. This must be fully investigated by the EIR and only historical usage amounts be allowed to be pumped. 65 gallons per minute could effectively dry up Las Garzas Creek. 26

Page 8-60 is unrealistic to compare the development's use of water to the agriculture use in Carmel Valley in the year of 1975. This means nothing and should not be included in this already cumbersome report. 27

8-60 To release reclaimed water into any creek to offset pumping deficiency could jeopardize the health of the residents of Monterey Peninsula as well as the downstream residents. San Clemente Creek terminates at San Clemente reservoir which is the drinking water source of the Monterey Peninsula residents. It has never been fully proven that reclaimed water has had ALL adverse elements removed. Some nitrates are extremely expensive or impossible to remove. It has been strongly noted that applications of chemicals do cause severe adverse health conditions to some people playing on or working on golf courses. This information is becoming more and more publicized. Why jeopardize people's health downstream for the success of an unnecessary golf course designed for a limited few. This is a very significant impact and should not be allowed. To mitigate, the irrigation system should be redesigned to restrict reclaimed sewage water from being used on the portion of the golf course which is located in the San Clemente Creek drainage. This must be studied further and discussed in depth in the EIR. 28

There is no mention in the draft EIR of the impact created by the large number of houses clustered around the perimeter of the golf course in 29

the San Clemente flats area. Leaching of salts from chemicals and other hazardous chemicals from landscaping, driveways and rooftops, tennis courts all flowing into San Clemente Creek also must be addressed. To mitigate no clustering of houses should be allowed around the golf course perimeter or all runoff must be captured and sent to the Sewage Treatment Plant for chemical removal. Water lost in the San Clemente drainage must be supplemented on a per gallon basis from other water sources. Each housing unit must be engineered to control this run off.

The total number of living units allowed for this project is again misleading. Page 5 of C. C. & R's the developer states most of the 270 estate type houses could allow addition units for caretakers, plus a guest house plus a senior citizen unit and there is no restriction to size to these building compounds. If these additional units are allowed all impacts of this project must be reevaluated, especially traffic and water for the projection of impact could be off as much as 400%. Total number of units allowed must be exact and addressed in the EIR.

Page 8-18 The EIR should not be allowed to use the water use comparison with Monterey, Pebble Beach and Rancho Fiesta as Rancho San Carlos climate is much more severe with many summer days exceeding 100 degrees in the main area of development. As a neighboring couple to the proposed development with our personal experience of thirty five years, we occupy a 3000 square foot house with a small 35,000 gallon swimming pool and limited landscaping in an enclosed courtyard. Our use is between 2 - 2 1/4 acre feet per year. If the developer is allowed caretaker units, senior citizen units, guest units these houses must be added into the water demand. The developer's C.C.&R's states the property owner has developmental rights for a complete residential compound and can have no limit to size of principal residence. More accurate data must be supplied for the units and all allowable facilities such as swimming pools, ponds, orchards, vineyards, etc. must be tabulated. On hot days our swimming pool can evaporate up to 1/2 inch of water in twelve hours which equals approximately 250 gallons of water lost to evaporation in that twelve hour period.

Redwood Trees The amount of water used by Redwood Trees has been omitted. Jerome Hewes, author of "Redwoods, World's Largest Trees", states each mature redwood exaportranspires 500 gallons of water per day. Referring to page 11-37 the developer states five acres of lost redwoods equal .05% of Total Community. This means there are between 750 and 1000 acres of redwoods on the property, multiplied by 500 gallon per mature tree times approximately 100 trees per acre equals well over thirty five million gallons a day or close to 10 acre feet per

day. The water use of all trees and native vegetation must be accurately calculated by a third party reviewer and added to the water use figures as this huge quantity of water will explain where the water is used that does not run down the various drainages to Carmel River and San Jose Creek. This information will disprove the developers claim that their water goes into deep water storage. Again this is false and misleading information. The trees are green because they use water. Refer to Jeff Norman's letter of October 8, 1992 to the County. Mitigation is not possible until all data is accurately listed. Provide more data on all vegetation demands for water.

If the developer bases his unit usage .75 acre feet a year, each estate should be held to that figure of usage by meters. This should be placed in the C C & R's. and the County's permit. It should be addressed in depth in the EIR.

We question the legality of existing uses stated on page 2 - 7.

Page S-4 states there are 363 lots of record. Page 20-14 states there are 550 potential house sites if the legal lots of record would be developed. This is a very misleading statement and should not be included in the EIR as many of these lots of record have no access and can not have access due to the steep terrain. They have no onsite water and can not be divided as they do not meet the minimum requirements of the County and State. If the County has certified 125 Lots of Record than this is the number that must be used. If a larger number is to be used than the County must certify each lot to be included. This is only an unfounded scare tactic used by the developer and his supporters. This must be clarified in the EIR and the exact number of the Lots of Record, and which ones that can be further divided must be stated and shown on maps in the EIR.

Page 6-12 Quarry site. The Quarry site must be more accurately located on maps in the EIR. A 425,000 cubic yard pit is nothing to be taken lightly. The reference of 176 acres graded to 1 1/2 feet is totally misleading. Why not say a 17 1/2 acre site would leave a twelve foot deep cut , or a 1 1/2 acre site would be over 125 foot deep. The Del Monte - Pebble Beach quarry is a huge pit in a small area and would be a more realistic comparison. More exact information must be provided before an intelligent assessment can be made for the proposed quarry. How much intra ranch traffic will be generated by hauling base rock from the quarry site to the roads and parking areas, etc. east of Robinson Canyon Road. Where will these trucks cross? What are the dust control measures for Robinson Canyon Road? The average truck in the mountains will carry twelve tons. It will take in excess of 35,000

truck loads to haul 425,000 tons of material. These trucks will return to the quarry empty which means over 70,000 one way trips. These impacts must be pointed out in the EIR.

The amount of overburden to be removed to reach the hard rock has not been addressed and must be fully reviewed in the EIR.

Page 2-13 Buildout phasing is to be carried out in 24 phases during a period of 20 years. To subject the established residents and the first residents of the Santa Lucia Preserve to this duration of construction traffic noise, pollution, dust, and general disruption must be regarded as highly significant. The developers must be held accountable and all roads and heavy construction be in place within a time not to exceed two years to reduce this impact to less than significant. No one goes to the wilderness to put up with twenty years of heavy construction. This must be further addressed in the EIR.

The developer has promised to dedicate 18,000 acres of their land to an irrevocable land trust. The DEIR states as each phase of construction is completed a certain amount of that 16,000 acres will be donated to the trust. On page 2-14 it says 9,300 acres of open space "wildlands" the rest of the preserve (no accurate figure found) comes from the property owners. Another page refers to 14,850 acres of preserve. It must be stated accurately just how many acres are going to be dedicated once and for all and this figure must be held to. This figure must be addressed in the EIR. Phasing in turn provides the developer with an escape mechanism for any phase that is not completed could be sold with the purchaser not being obligated to dedicate anything to the trust. Also the developer could put in the critical stages, golf course, hotel, lodge phases and sell off the entire remainder of the ranch with only a few thousand acres being dedicated to the Preserve. This is misleading and must be remedied and made binding that all lands are dedicated to the Preserve before any permits are approved, thus keeping in the spirit of the initial promise. The CC&R's must also require purchasers to dedicate their "Openlands" to the Trust as promised. The purchaser can not say they are going to dedicate their lands, there must be something included that legally binds them to do so. This must be fully addressed in the EIR.

Page 3-16. There is no provision for wildlife corridors in or around or through the golf course. This location is a very sensitive grazing, watering, breeding and nursery area for young animals. This area provides ample water, good feed, and is safe for it provides a good viewing distance from predators. What will the mitigation be to reduce this impact to less than significant? This is a national park type area

and is not the proper location for a golf course. To mitigate, relocate the golf course. Provide adequate wild life corridors through golf course. Third party reviewer must study in depth historical wild life corridors through golf course and implement his findings.

There is no mention to the highly significant loss of wildflowers on the proposed golf course. Wildflower viewing in this area has been a very popular outing. There are those who have done so annually for sixty years. The golf course will completely destroy these beautiful flowers.

Page 11-49 & 50 To mitigate the nesting of hawks and golden eagles the developers states they will mitigate nesting simply by not allowing construction in these areas during the nesting season. The DEIR neglects to state where these birds will nest once the improvements are in, for instance it is misleading to assume the eagle or coopers hawk will return to their favorite nesting area once the golf club house construction is completed. First, these birds will not consider the area if construction has started. They can't read an EIR to advise them - construction will stop when they decide to build their nest. They will not try again when the improvements such as the golf club buildings are complete, or people are flashing golf clubs to chase away the flies on the course. They will leave, and so will the other animals for they do not know anything about developers promises, agreements and mitigations. Why is the loss of eagle and hawk habitat considered less than significant? This must be addressed in the EIR.

Page S-3 The rezoning of the thirteen acres of the employee sport center adjacent to the 3 1/2 acres of maintenance is questionable. What is the reason for this? What opportunities does this rezoning allow in the future? This must be fully addressed and restrictions imposed.

Page S-3 Why do the developers need variances to build on slopes over 30%? With 20,000 acres to chose from it is not necessary to build on unallowable slopes. Monterey County Ordinance disallows construction in these areas. Why weaken an established ordinance with a variance when there are plenty of places to relocate. To mitigate, do not allow hillside construction in any viewshed. The twenty employee housing units contained in five buildings that is proposed on the hillside south of Moore's Lake, adjacent to Robinson Canyon Road would create a major impact to the scenic drive of Robinson Canyon Road. The flagging already in place shows these units will be highly visible and do not conform with any type of rural development. These units must be relocated out of sight to reduce the visual impact to less than significant. This must be further addressed in the EIR.

Page 19-7 does not refer to flooding of San Clemente Rancho, but only Carmel River property. The heavy rains of 1995, caused severe damage to our property downstream on San Clemente Creek. The additional heavy rapid runoff created by the golf course, housing, roads, drains, and compacted landscaping could destroy the property downstream. It must be noted we have experienced many winters with higher rainfall, but only one or two every ten years in which the rain comes so rapidly. A County rain gauge is located on our property for accurate measurement and early flood warning. Catch basins can not be designed to control this type of run off. This is a very significant impact. To mitigate to less than significant, engineering specifications must be reevaluated to accommodate flood waters with the volume of the March 10, 1995, storm. All improvements must be built to satisfy these specifications. All culverts must terminate in a collection facility and not be allowed to "daylight" downstream to neighbors property. Silt collection facilities must be placed on all drainages with measures to prevent overflow. Golf course must be relocated out of drainage. This must be fully addressed in the EIR.

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Bonding must be fully discussed in the EIR. If all mitigation measures to off site properties fail, which could very well happen, damage bonds must be enforced to protect adjoining property owners from financial burden and protect Monterey County from legal action caused by the development to the adjoining properties. These bonds must cover loss of water, loss of quality of water, flooding, siltation, loss to habitat, or any other damage caused by the development.

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Page 5-20 Wetlands have not been adequately defined. Ground water must not be disturbed near wetland areas. The golf course covers several acres of wetlands. This should not be allowed. Wetlands must be determined and avoided, drilling in wetlands must be prohibited. This must be addressed further in the EIR.

47

Page 16-16 Fire access report is not complete. The access to sites #240, 241, 233 and others on Long Ridge can't meet County road specifications for grade, width and drainage. They do not meet CDF requirements as well. The plan therefore designates their accesses as driveways rather than a road. The problem for safety and access of emergency vehicles especially firetrucks will be compounded. This access would not be allowed under a road name, but the developer can get away with it using a driveway designation. This would be extremely unsafe for the owners of these houses and adjacent property owners. If a fire starts in one of these houses, large trucks would never be able to get to the sites. To mitigate, these extremely long driveways

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must be designed to meet County road and CDF standards, or relocate these sites to a more accessible and safer location.

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Topics submitted for scoping in DEIR, but not addressed in the DEIR by contractor. We resubmit the following topics which were omitted. Golf Course impacts on local road (Dormody Road), impact of 50 additional wells, air quality, impact to environment by spraying obnoxious insects, energy use from pumping from 80 deep wells, preservation of Stevenson Cabin.

49

The thirteenth tee is highly dangerous and should be relocated. It sits on a mound directly above the roadway. This mound is also a significant archeological site.

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The changing of Dormody Road name would have an economic and social impact. The developer changed the County designated name on all their maps to San Clemente Road. There is already a San Clemente Road in Carmel Valley which terminates at San Clemente Dam. This causes a significant impact for the adjacent landowners served by Dormody Road and in the Sleepy Hollow area for accurate 911 response. To mitigate - leave the Dormody Road name alone and stop this ridiculous spite move. The changing of the road name must be fully addressed in the EIR.

51

Uncontrolled wildfire is a very important concern, and it must be considered highly significant. The Fire Plan with its fire safety areas is totally unacceptable as proven by the Glenwood Springs fire of 1994 where many professional firefighters were "cooked" in such an area. To mitigate, a professional third party must review and reevaluate these plans.

52

The development plan refers to the C C & R's for control of many potential impacts. A good example that no estate owner would be allowed to drill their own well on their own site. The C.C.&R's also state that any item in the C.C.&R's "may be amended by written document and executed by 75% of the Owners of recorded lots". This is a highly significant article for it takes all the control out of mitigating measures. The EIR must address this and place binding controls in the permits.

53

The third party review of the technical reports of the geology and geotechnical reports refer to Debris Flows Hazards on the project (C-7) but neglects to state effects on the downstream properties. Log jams continually form and break away in the redwood forests in San Clemente

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Creek. When these logs shoot downstream at a tremendous velocity severe damage can occur to structures, as happened in both the January and March 1995 storms. It is now the end of June, 1995 and we are still working seven days a week to repair this damage. Photographic and video evidence are available to prove this statement. No on site inspection has ever been made to the downstream properties for potential damage that could come from Rancho San Carlos development. The Long Ridge portion of the development which lies 2000 feet directly above the San Clemente Rancho cabin area poses a severe threat to the improvements below. Periodic land slides which occur every winter in this area will only be accelerated by development in these steep areas. More study must be directed to all of these hazards before any mitigating policies are adopted. C-8 States that the slope stability analyses are insufficient to support development of the landslide masses. This must be reviewed further in depth by the EIR. It is interesting to note, all third party review reports are more accurate in potential impacts and mitigation measures than the developers private consultant reports. More third party review should be obtained for all the major portions of the plan. Information supplied by the developer should be reviewed in depth and not be allowed until it is found totally accurate by a third party reviewer. The Fox should not be allowed to build the Hen House. Third party review of all information must be addressed in the EIR.

54

Financial responsibility The developer must provide adequate data that they have sufficient funds to start and complete the project in a timely manner. This will be one of the most costly project proposed in Monterey County. Monterey County must have bonded assurance the project will be completed and enough funds are available to accomplish this. All financial data must be submitted to a third party audit and approved by Monterey County before the project is allowed to commence. This must be investigated and commented on in the EIR.

55

Enforcement Who will be the enforcer of the enforcing agency if they are the developers? This must addressed in depth in the EIR. Should the Preserve pay the Monterey County to provide an inspector to monitor the mitigations? A program to oversee and evaluate required mitigation activities must be adopted. This topic must be addressed in the EIR.

56

The draft EIR, as it stands, is inadequate, inaccurate, and full of unfounded assumptions. It must thoroughly be reevaluated before the EIR is finalized. A development of this magnitude ("a new community") should be allowed more time than 45 days for the various agencies, public, and adjoining property owners to study, review and comment.

57

We have requested and been denied a thirty day extension to comment on the DEIR. We protest this denial as the development is huge and the EIR should cover all impacts this new town will have on the area. We also protest the shabby treatment we have received from certain members of Monterey County staff, especially the County Counsel staff. Their lack of reply to our valid requests and questions pertaining to this project over the last four years has been disgraceful.

If County staff gives a last minute extension to the reply period of this DEIR, we reserve the right to place an addendum to our reply letter to further address the impacts not mentioned in the DEIR.

A properly planned, sensitive development, on the Santa Lucia Preserve could evolve into something unique for the whole peninsula and an asset for all. The plan, as submitted, which allows for every type of revenue generating facilities the developer can come up with and is full of loop holes that would allow future development will be disastrous for everyone. This plan as submitted tells one what to expect for the future. It is not a good plan. It has no safeguards and should be resubmitted, keeping in mind and honoring the restrictions Monterey County Board of Supervisors placed on the land in their overgenerous density and land use designation. The developer must be required to give up a portion of saleable lots to relocate employee housing and maintenance facilities and golf course off of Robinson Canyon Road and out of public view.

Respectfully

Michael H. Samad

David D. Barnady

Response to Comments from Michael and Donna Dormody (July 6, 1995)

1. The summary chapter of Volume II of the final EIR has been revised to indicate that cabin sites are leased and not rented. Comments on the Notice of Preparation are used to focus the scope of the EIR. Additional meetings between the commenters and the EIR preparers were not considered warranted.
2. The commenters are expressing their opinion that the proposed project will destroy wildlife viewing from the Robinson Canyon Road and Dormody Road. The EIR does not come to this conclusion. Refer to the response to Comments 232, 233, and 234 from Bruce Dormody (July 13, 1995).
3. Refer to response to Comment 233 from Bruce Dormody (July 13, 1995) regarding views from Dormody Road. The alternatives addressed in Chapter 20, "Alternatives", are considered adequate and consideration of additional alternatives is not required. Page 12-1 of the draft EIR does not show any figures. Figure 12-2 indicates the views evaluated. The evaluation of views from Robinson Canyon Road is provided on pages 12-15 through 12-24 of the draft EIR and is considered adequate. The maps provided adequately convey necessary information.
4. Review of the vesting tentative map indicates that the building envelopes for Lots 233 and 234 are within 150 yards of the property line. However, because a natural buffer exists between building sites and adjacent property lines and because the potential area that would be restricted is so small, this impact is considered less than significant. For reasons similar to those presented on pages 15-15 and 15-16 of the EIR, the potential noise impact is not considered significant. Although no mitigation measure is required, a mitigation measure similar to the one discussed on page 15-16 may reduce the potential for complaints.
5. Refer to responses to Comments 249, 256, and 259 from Bruce Dormody (July 13, 1995).
6. The evaluation of potential traffic increases on Robinson Canyon Road is provided on page 13-38 of the draft EIR and is considered adequate. Refer to response to Comment 259 from Bruce Dormody (July 13, 1995).
7. The evaluation of potential traffic increases on Robinson Canyon Road is provided on page 13-38 of the draft EIR and is considered adequate. A significant impact was not identified. An additional frontage road is therefore not required. Refer to responses to Comments 249 and 259 from Bruce Dormody (July 13, 1995).
8. Refer to response to Comment 259 from Bruce Dormody (July 13, 1995). No additional evaluation of traffic impacts on Robinson Canyon Road is required.
9. Refer to response to Comment 8 above.

10. Comment noted. The Monterey County Department of Public Works will be responsible for monitoring traffic mitigation measures and will determine appropriate means to do so.
11. Refer to response to Comments 249 and 268 from Bruce Dormody (July 13, 1995). No additional evaluation of Robinson Canyon Road is required.
12. As discussed on page 13-21 of Volume II of the final EIR, the Monterey County Public Works Department has no record of any reported accidents on Robinson Canyon Road between 0.5 mile south of Carmel River and the road's terminus at White Rock Road since 1988. In general, the road is not suited to bicycle use because it is steep, narrow, and winding. If bicyclists choose to ride on this road, they must ride in a safe manner and comply with traffic laws. If they choose to ride in an unsafe manner, they pose a safety risk. The potential for accidents is related more to the way a bicyclist rides than the limited number of cars that will be added by the project.
13. Comment noted. Several alternative mitigation measures for the intersection of Carmel Valley Road and Rancho San Carlos Road are presented in the draft EIR, including contributing to a fund for the construction of an underpass. Refer to response to Comment 265 from Bruce Dormody (July 13, 1995) concerning payment of fees to fund mitigation measures.
14. As discussed on page 13-29 of Volume II of the final EIR, trip generation figures are based on surveys done at similar developments. Details on the specific number of dwellings that would be built on each site are not available. Chapter 19, "Cumulative Impacts", of Volume II of the final EIR has been expanded to address the effects of auxiliary units.
15. The number of employees listed in Table 13-10 and used for calculating trip generation is considered reasonable and adequate. No additional analysis is required.
16. Comment noted. The effects of the proposed project on the water supply are considered to be adequately addressed in Chapter 8, "Groundwater, Hydrology, Stream Base Flow, and Water Supply and Demand." The EIR concludes that the applicant's proposed mitigation measures and additional mitigation measures specified in the EIR will reduce impacts to a less-than-significant level. Alternatives addressed in Chapter 20, "Alternatives", address a reasonable range of alternatives. Evaluation of additional alternatives, including an alternative involving desalination, is not required.
17. The issue of water supply and related effects has been studied extensively for this project by five technical consulting firms. Refer to page 8-1 of Volume II of the final EIR for a summary of studies conducted. The analysis presented in Chapter 8 draws principally on information presented in the Comprehensive Hydrological Study and its three supplements, which are available for review at the Monterey County Planning and Building Inspection Department. The EIR concludes that the applicant's proposed mitigation measures and additional mitigation measures specified in the EIR will reduce impacts to a less-than-significant level. No additional analysis is required.

18. The project is not obligated to mitigate impacts on stream base flow caused by factors other than the project, such as a drought. The mitigation measure described on pages 8-48 to 8-51 of the draft EIR describes several means by which the effects of the project could be distinguished from other effects. Regarding well siting considerations, a separate mitigation measure (see page 8-45 of the draft EIR) already requires that new wells be located at least 1,000 feet from protected base flow reaches. As discussed on page 8-50, wells would be far enough from the creek that pumping to provide supplemental base flow would not induce a corresponding increase in seepage losses from the creek, at least not during the remainder of the low-flow season. Finally, the depth to water at most wells, especially wells more than 1,000 feet from base flow reaches, is generally considerably greater than 50 feet. Thus, a requirement to have longer surface seals in the wells to prevent impacts on surface water bodies is not really necessary. Also, at large distances from a well that pumps only from the bottom part of an aquifer, drawdown tends to become increasingly uniform in the vertical direction. In other words, at horizontal distances greater than 1,000 feet, drawdown effects near the land surface for a well with a 50-foot surface seal would be similar to those for a well with a 300-foot surface seal.
19. The mitigation measure on pages 8-48 to 8-51 of the draft EIR clearly states that San Clemente Creek is to be included in the stream gaging and base flow monitoring program (page 8-48). A protected base flow reach also must be defined for San Clemente Creek. The sentence referred to in the comment (second paragraph on page 8-49) simply clarifies that for the purposes of monitoring, the defined protected base flow reach on San Clemente Creek need not include the reach of the creek downstream of the Rancho San Carlos property line. Downstream monitoring is not necessary because the mitigation measure ensures that flows leaving Rancho San Carlos will not be significantly diminished. Because the existing and proposed locations of water supply wells for the Santa Lucia project are a substantial distance from the property line near San Clemente Creek, they would not directly deplete base flow in the reach downstream of the property line.
20. The statements are not contradictory. The data discussed on pages 8-34 to 8-37 of the draft EIR clearly indicate that the types of changes in grazing management proposed in the Cattle Grazing Plan can result in large decreases in runoff and large increases in infiltration and base flow. Thus, the data support a conclusion regarding the general order of magnitude of the effect (large), even though a precise quantitative estimate of the effect cannot be reliably determined.
21. The commenters' observations concerning erosion and gullies are noted. Refer to response to Comment 85 from Bruce Dormody (July 13, 1995). It is appropriate and reasonable to include the effects of the Cattle Grazing Plan in assessing impacts associated with the proposed project.
22. The mitigation measure referred to in the comment specifically states that water discharged to maintain base flow must be of "a quality that would not adversely affect aquatic biota" (page 50, paragraph 5). This includes water temperature. Water temperature would not be a problem if flow is supplemented with groundwater pumped directly into the creek, because

base flow in the creek already consists of natural groundwater discharge. The mitigation measure effectively requires that supplemental water obtained from surface impoundments not be so warm that fish would be adversely affected.

23. Pine Creek is sufficiently close to Rancho San Carlos that changes in streamflow caused by droughts would affect both areas equally. It is not essential that rainfall be identical in both areas (although, in fact, it is similar), only that annual variations in rainfall and runoff be similar. This provides a means of distinguishing the effects of rainfall variations from the effects of land development.
24. The discussion of the effects of grazing on runoff and infiltration includes information from one study in California. Although fewer studies have been done in California than in Texas, the processes by which grazing affects runoff and infiltration in Texas (soil compaction, decrease in vegetative cover, and depletion of litter) would also operate in California. Please refer also to the response to Comment 20.
25. September was selected as the best month for monitoring low flows because temperatures are often still warm and because rainfall could begin causing increases in streamflow as early as October. Thus, an adverse combination of low flows and warm temperatures is more likely to occur in September than in any other month. The year-round stream gaging program will provide a means of evaluating effects in other months.
26. In the context of groundwater rights, overlying land refers to land overlying the groundwater basin. Surface water drainage basins are irrelevant. Most alluvial groundwater basins underlie a single surface water drainage basin, and the definition of overlying land is straightforward. In the case of Rancho San Carlos, the groundwater "basin" is the fractured bedrock groundwater system. Geologic and hydrogeologic evidence was presented in the Comprehensive Hydrological Study to demonstrate that for practical purposes, the groundwater system is continuous throughout Rancho San Carlos. Thus, all of Rancho San Carlos is overlying land with respect to the groundwater system, even though there are several separate surface water drainage basins. The right to use groundwater on overlying land, like the riparian right to use surface water on parcels adjoining a stream, is not ordinarily quantified. The water must be used for reasonable and beneficial purposes, which include municipal supply and irrigation of golf courses. Also, the amount of use is not limited to historical use, as is implied in the comment.
27. Consumptive use for crops has not changed significantly since 1975, because it is determined largely by plant physiology and climate. This is one reason the California Department of Water Resources has not published updated crop water use tables. Irrigation efficiency has improved for some crops in some areas. This decreases the amount of applied water but usually does not greatly decrease the consumptive use of water.
28. The effects of the proposed project on surface water and groundwater quality are discussed in Chapter 9, "Runoff, Flooding, and Water Quality", of the EIR. Mitigation measures

incorporated into the project design and additional measures to monitor water quality, will reduce impacts to a less-than-significant level.

29. Refer to Comment 28 above.
30. Chapter 19, "Cumulative Impacts", of Volume II of the final EIR has been revised to address the cumulative effects of auxiliary units.
31. The itemized water demand for the project was reviewed and approved by local agencies and is considered reasonable and adequate. Chapter 19, "Cumulative Impacts", of Volume II of the final EIR, has been revised to address the cumulative effects of auxiliary units.
32. The water use figures cited in the comment are not realistic. The comment indicates that mature redwood trees transpire 500 gallons per day and that there are approximately 100 trees per acre. On a per-acre basis, this translates into an evapotranspiration rate of 0.15 foot per day, or 56 feet per year. This is clearly an unrealistically high rate. Even tules growing in isolated tanks in the middle of the Mojave Desert transpire less than 8 feet per year. Water use by mature trees is very difficult to measure directly, because they cannot be grown in lysimeters the way crops can. Although tall crops often have evapotranspiration rates that are larger than reference evapotranspiration, the increment is generally small (20% or less). Ultimately, the evapotranspiration rate is limited by the amount of leaf area exposed to the sun and the stomatal resistance of the leaves (which describes the ability of water to escape through the "skin" of the leaf). Exposed leaf area does not continue to increase rapidly with tree height, because the lower parts of the trees have fewer branches and are shaded by adjacent trees. Also, the needle-like shape and thick waxy skin of redwood tree leaves tend to minimize the transpiration rate. Reference evapotranspiration at Rancho San Carlos was estimated in the Comprehensive Hydrological Study to be approximately 3.5 feet per year. Evapotranspiration by redwood trees is probably greater than reference evapotranspiration, but certainly by much less than a factor of 16.

Finally, redwood trees typically grow in areas that receive some fog in summer. The tree needles coalesce fog droplets, creating "fog drip", which infiltrates into the soil around the base of the tree. In some coastal areas, fog drip has been shown to provide a substantial fraction of the annual water demand of the tree. Thus, not all of the evapotranspiration demand of redwood trees is necessarily supplied by groundwater.

33. The commenters' suggestion concerning limits on water usage is noted. Mitigation measures outlined in the EIR are considered adequate and such limits are not considered necessary.
34. Comment noted. No illegal uses have been identified.
35. Comment noted. Information provided in the EIR is considered accurate.
36. Refer to responses to Comments 73, 82, and 273 from Bruce Dormody (July 13, 1995). Construction trucks will not use Robinson Canyon Road. Impacts from construction trucks are

addressed on page 13-38 of Volume II of the final EIR. Measures to control dust are described on page 14-11 of Volume II of the final EIR.

37. Although the EIR does not differentiate between the amount of overburden material and the amount of underlying rock to be removed, approximately 300,000 cubic yards of total material will be taken from the borrow area. The specific amount of overburden to be removed is unknown; this will be determined upon detailed site investigations. Topsoil at the site will be stripped and stockpiled for later reapplication to the borrow area after borrowing operations are complete. Potential erosion and sedimentation effects at the borrow area are described on page 7-9 of Volume II of the final EIR. Refer to page 7-8 of Volume II of the final EIR for additional information.
38. Comment noted. The EIR concludes that construction-related impacts are not significant or can be mitigated to a less-than-significant level.
39. The 9,300 acres of open space "wildlands" discussed on page 2-14 of the draft EIR are included in the approximately 18,000 acres of "preserve lands" discussed on page 2-5 of the draft EIR. The commenters' opinion as to how the project should be phased is noted and may be considered by the board of supervisors.
40. As discussed on page 11-35 of the draft EIR, BioSystems Analysis prepared a Special-Status Wildlife and Botanical Resources report for the golf trail application. Impacts and mitigation measures discussed in the EIR include the effects of the golf trail. Also refer to response to Comment 219 from Bruce Dormody (July 13, 1995).
41. Refer to response to Comment 40 above. The effect of the golf trail on special-status plant species has been addressed in the EIR. Unless the wildflowers are considered to be special-status species, their loss or disturbance would not be considered significant under CEQA. However, wildflowers that occur in wetlands will receive some form of protection through mitigation because they occur in a sensitive natural community. Mitigation has been recommended for wetland habitat.
42. Contrary to the commenters' statement, potential construction-related impacts on nesting Cooper's hawks and golden eagles are identified as being significant in the draft EIR. The mitigation measures specified to reduce these impacts to a less-than-significant level are commonly used in this type of situation and are considered adequate.
43. The rezoning is needed to allow the uses requested in the combined development permit. Only those uses requested in the combined development permit would be allowed.
44. Construction in areas with slopes in excess of 30% is related primarily to driveways. Refer to page 12-26 of Volume II of the final EIR. The EIR does not identify significant visual impacts related to the employee housing units and no additional mitigation is required.

45. Increased stormwater runoff associated with implementation of the project is discussed on page 9-17 of Volume II of the final EIR. A significant impact is identified and a mitigation measure to implement best management practices to attenuate floodflows is specified. This mitigation measure is considered adequate.
46. CEQA does not require bonding to be discussed in an EIR.
47. Chapter 5 ends on page 5-9. There is no page 5-20. Impacts on wetlands are discussed in Chapter 11, "Biological Resources", of the EIR.
48. As stated in the draft EIR, all roads will be designed to a standard acceptable to the California Department of Forestry and Fire Protection (CDF) and the Monterey County Department of Public Works. The discussion of fire protection is considered to be adequate.
49. The effects of the golf trail on traffic are discussed in Chapter 13, "Traffic", of the EIR. Impacts related to water supply are addressed in Chapter 8, "Groundwater, Hydrology, Stream Base Flow, and Water Supply and Demand". Air quality impacts are addressed in Chapter 14, "Climate and Air Quality". The effects of urban and agricultural pollutants are addressed in Chapter 9, "Runoff, Flooding, and Water Quality." The increased demand for energy (specifically electricity) is discussed in Chapter 16, "Public Services and Utilities". Historic resources are addressed in Chapter 17, "Cultural Resources".
50. The commenters' concern for the safety of golfers is noted. Page 17-5 of Volume II of the final EIR identifies a mitigation measure for historic sites.
51. The commenters' concerns are noted. Appropriate authorities will be notified if the name of the road is changed. No significant environmental impacts would result.
52. The discussion of fire protection provided in Chapter 16, "Public Services and Utilities", is considered adequate. Numerous measures are incorporated into the project to address concerns over fire.
53. Although residents may change the CC&Rs, any change that could result in a potentially significant environmental effect would require review by the county.
54. The commenters' concerns regarding third-party review are noted. Weber, Hayes & Associates and Nolan Associates provided third-party review for geotechnical issues. Weber Hayes & Associates and Nolan Associates have worked closely with the applicant's geotechnical consultant in resolving issues raised during the third-party review process. Ogden Environmental and Energy Services has provided third-party review for hydrological issues.

The peak rock strengths previously used in the landslide stability models have been revised as a result of the third-party review process.

There would be a significant impact only if the project would cause a substantial increase in the likelihood of debris flows. Although vegetation would be removed and soil disturbed to accommodate development, the relatively small extent of developed areas is not expected to increase runoff volumes to the extent that a substantial increase in debris flow hazard would occur.

55. The commenters' concerns and suggestions related to financial responsibility are noted. The requested financial information is not required in the EIR.
56. The party responsible for monitoring each mitigation measure is identified in Table B-1 of Volume II of the final EIR.
57. The EIR provides a reasonable assessment of environmental impacts associated with the proposed project and is considered adequate. The length of the public review period was in accordance with the requirements of CEQA.

26500 Val Verde Drive
Carmel, CA 93923
July 7, 1995

Wanda Hickman
Monterey Co. Planning Dept.
PO Box 2108
Salinas, CA 93902

Dear Ms. Hickman:

I'm writing in response to the Draft Environmental Impact Report on the proposed San Carlos Ranch development.

Along with others, I'm concerned about the lack of mitigating measures on traffic both on Robinson Canyon Road and Carmel Valley Road. I also wonder about the water supply, and what will be done should the wells on the Ranch go dry during a prolonged drought period. The DEIR doesn't really deal adequately with these two vital issues.

However, a further concern is their open space or nature preserve, or wildlife habitat provision, as it's sometimes referred to. They have repeatedly said in their publicity that only 2,000 acres of the property will be used for development, leaving the other 18,000 acres as open space. This leaves the impression that these 18,000 acres will be completely untouched, and separate from the developed areas. Having now seen maps of the proposed development, though, I see that this is incorrect, and that far from clustering the lots together they are scattered over much of the property. The "wildlife habitat" appears to be primarily areas near the lots, or areas too steep to be built on in any case.

This would indicate that, unlike Las Palmas Ranch where a large wooded area was set aside and the houses clustered together on the remaining property, houses and wildlife habitat will be all mixed up together. This is hardly ideal for either the wildlife or the property owners, and could lead to problems in the future for both.

I would therefore urge that far larger portions of the ranch be set aside in nature preserves and considerably more clustering of the houses be done. They could still be large lots, 5 to 10 acres in size, but would be contiguous.

Please include my comments in the record. Thank you.

Sincerely

Bobbie Harms

(Ms. Bobbie Harms)

Response to Comments from Bobbie Harms

1. Traffic mitigation measures have been identified at locations where impacts determined to be significant have been identified. The effects of the project on water supply are discussed in detail in Chapter 8, "Groundwater, Hydrology, Stream Base Flow, and Water Supply and Demand". This discussion is considered adequate.
2. The commenter's concerns and suggestions are noted.

Kim Forrest
25305 Tierra Grande
Carmel, CA 93923

May 31, 1995

Ms. Wanda A. Hickman, Associate Planner
Monterey County
Planning and Building Inspection Department
P.O. Box 1208
Salinas, CA 93902

RE: DRAFT EIR - SANTA LUCIA PRESERVE PROJECT (PC94067/PC94218)

Dear Ms. Hickman:

The natural beauty of Monterey County makes it, I believe, the most beautiful place on earth. It is world-renown for this incredible beauty. This recognition is the reason for the principle economic support for the area - tourism. The "Santa Lucia Preserve Project" proposes to develop 92% of a 20,000-acre parcel in the very heart of this most unique treasure we have. To declare that the EIR considered all major potential significant environmental impacts and that "all significant impacts can be reduced to less-than significant levels through implementation of mitigation measures" is absolutely ludicrous. Over 16,500 acres - 92%! - is being developed...this is "less-than significant"?!!? That conclusion is absolutely absurd. I can hardly believe Water Supply and Demand, Biological Resources, Traffic, and - most of all - Aesthetics were truly, thoroughly, and fairly considered. Numerous prior zoning regulations are actually being thrown out the window, apparently having served nothing but lip service up till now, in order to allow this project to go forward. Zoning reclassifications from Resource Conservation to Light Commercial, Heavy Commercial, Offices, Medium Density Residential, and Low Density Residential; building on 30% slopes; 18-hole golf course; club houses; sports facilities...and then turn around and call 18.96-acre fragments (no doubt in someone's backyard) "open space" is absolutely ludicrous. To call this a "Preserve" is absurdly obvious subterfuge. 1

Was total acquisition by a consortium of County, State, Federal, and NGO organizations in a large joint venture ever considered? I doubt it. If not, I strongly recommend the Final EIR include this as an alternative preferred by the County. 2

Thank you.

Sincerely,



Kim Forrest

Response to Comments from Kim Forrest

1. The commenter's concerns are noted. As a point of clarification, 90% of the land, or approximately 18,000 acres, will be set aside as "preserve" lands and 10% of the land, or approximately 2,000 acres, is proposed for development.
2. The draft EIR considers a reasonable range of alternatives. Evaluation of an additional alternative related to a governmental consortium is not required.