

# Exhibit H

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Carmel Valley Association

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*preserving the beauty, resources, and rural character of the Valley since 1949*

February 2, 2019

To: Carl Holm, Mike Novo, John Dugan, Brandon Swanson  
Supervisors  
Planning Commissioners

**Subject:** PLN180281 for an after-the-fact permit for new construction and new use at Carmel Valley Ranch

Project PLN180281 is more than a design approval. This is for a new use at the Carmel Valley Ranch. This is an after-the-fact application for a lot of grading and heavy construction work that was already done. The project should include removing the 12 residential lots in this location that are part of past County approvals for Carmel Valley Ranch. And the project should include an amendment to the Carmel Valley Ranch Specific Plan that applies to the overall property.

The Carmel Valley Association does not object to the idea of horse use in theory but does object to the project not following the requirements and planning process for this change in use.

Carmel Valley Association requests additional information about the new horse uses and its potential impacts. This is more than design approval because the everyday use of the new proposed horse stables for 20 horses and barn at the site requires manure management, paved access, fly management, water, etc. The addition of the new use and new structures requires environmental review for impacts including erosion, grading, manure, paving, water use (the September Ranch EIR addressed water use per horse), traffic including horse trailers and hay deliveries, new roadways, and ensuring safe interaction between vehicles and horses and riders. In addition, CVA requests information about any anticipated horse events that would be included in the new use and what impacts those could have.

CVA requests that the County refer PLN180281 to the Planning Staff to follow the right procedure. CVA may support the project eventually but further information is necessary. We ask that the process be followed and that the Carmel Valley Ranch Specific Plan be amended as required. Past changes to Carmel Valley Ranch have required amendments to the specific plan, and this one should, too. Complete transparency is necessary so that the public knows what is allowed there and what is not.

The project is not exempt from the California Environmental Quality Act and not under Section 15303 as the County notice states. Section 15303 is for projects under 2500 square feet and for accessory structures like garages. This project would be 7,850 square feet of new structures. Further, it is for a new use that is not included in the specific plan, which is another reason it is not exempt.

We request that the Planning Department honor the Carmel Valley Master Plan and the Carmel Valley Ranch Specific Plan and set an example for development that is consistent with the

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regulations, ordinances, and requirements. We have met with the new owners of Carmel Valley Ranch, and we believe they want this done right.

Sincerely,

Pris Walton, Carmel Valley Association, President