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DEPARTMENT OF TRANSPORTATION

CALTRANS DISTRICT 5
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Making Conservation
a California Way of Life.

May 14, 2021

MON/1/72.9
SCH#20006081150

Mary Israel
Associate Planner
Monterey County RMA – Planning
1441 Schilling Place, 2nd Floor
Salinas, CA 93901

Dear Ms. Israel:

COMMENTS FOR THE SECOND FINAL ENVIRONMENTAL IMPACT REPORT (FEIR) FOR
THE RANCHO CANADA VILLAGE SUBDIVISION – CARMEL VALLEY, CA

The California Department of Transportation (Caltrans) appreciates the opportunity to review the second FEIR for the Rancho Canada Village Subdivision which proposes a 130-unit residential neighborhood and 40 acres of permanent open space and common areas within the 76-plus acres. Caltrans offers the following comments in response to the FEIR:

1. Caltrans supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel and development. Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals.
2. As a result of Senate Bill (SB) 743, effective July 2020 Caltrans replaced vehicle level of service (LOS) with vehicle miles traveled (VMT) as the primary metric for identifying transportation impacts from local development. Additionally, the Caltrans Transportation Impact Study Guide (TISG) replaces the Guide for the Preparation of Traffic Impact Studies (Caltrans, 2002) and is for use with local land use projects. The focus now will be on how projects are expected to

influence the overall amount of automobile use instead of traffic congestion as a significant impact. For more information, please visit:
<https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743>.

3. Employing VMT as the metric of transportation impact Statewide will help to promote Green House Gas (GHG) emission reductions consistent with SB 375 and can be achieved through influencing on-the-ground development. Implementation of this change will rely, in part, on local land use decisions to reduce GHG emissions associated with the transportation sector, both at the project level, and in long-term plans (including general plans, climate action plans, specific plans, and transportation plans) and supporting Sustainable Community Strategies developed under SB 375. In addition to any site-specific access or safety concerns with the project, it is likely that the Caltrans correspondence will focus attention on meeting overall VMT reducing goals.
4. Caltrans has no further comments as the revised second FEIR includes no changes to the transportation section. Due to SB 743, we now identify transportation impacts from VMT and not LOS.

Thank you for the opportunity to review and comment on the proposed project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 835-6543 or email christopher.bjornstad@dot.ca.gov.

Sincerely,

Christopher Bjornstad

Chris Bjornstad
Associate Transportation Planner
District 5 Development Review



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

West Coast Region

777 Sonoma Avenue, Room 325

Santa Rosa, California 95404-4731

May 4, 2021

Refer to NMFS No: 151416SWR2008SR00093

Mary Israel
Monterey County Housing and Community Development
1441 Schilling Place - South, 2nd Floor
Salinas, California 93901

Re: NMFS' Comments on Certification of the Rancho Cañada Village Subdivision Second Final Environmental Impact Report

To Mary Israel:

This letter is in response to the April 22, 2021, Notice of Public Hearing of the Monterey County Board of Supervisors' consideration to certify the Rancho Cañada Village Subdivision Second Final Environmental Impact Report (FEIR). NOAA's National Marine Fisheries Service (NMFS) has previously submitted written comments on three earlier drafts of the Environmental Impact Report prepared for this project. These include the 2008 Draft EIR, the 2016 Revised Draft EIR, and the June 2020 Second Revised Draft EIR.

The Carmel River supports a population of the South-Central California Coast (S-CCC) steelhead (*Oncorhynchus mykiss*) Distinct Population Segment (DPS), which is listed as threatened under the federal Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The Carmel River and many of its tributaries have been designated as critical habitat for the DPS. In our recovery plan for the S-CCC steelhead DPS, NMFS identified the Carmel River as a Core 1 population, which means it is of the highest priority for the recovery of the DPS (NMFS 2013).

While NMFS applauds the project's dedication of permanent open space along the river's floodplain and appreciates the need to reduce the rate, volume, and quality of runoff from newly constructed impervious surfaces, we strongly object to the proposed grading plan—particularly the creation of a deep and isolated pond, or detention basin. Some of our comments on the June 2020 Second Revised Draft EIR remain warranted, and the risk of steelhead stranding and predation posed by the creation of the detention basin still concerns us.

Without an outlet channel, the detention basin will create opportunities for stranding of steelhead, as acknowledged in the Second FEIR. As mitigation for potential stranding, the Second FEIR states:

The Applicant or successor(s) in interest will apply to the NOAA Fisheries and to the (Department of Fish and Wildlife) for permissions to rescue steelhead if they become trapped in the new site basin. The Applicant or successor(s) in interest



will be responsible for arranging the inspection of the basin after any storm event that results in temporary filling from the Carmel River. Steelhead will be rescued from the basin and either returned to the Carmel River immediately and/or be held at an appropriate facility (such as the [Monterey Peninsula Water Management District {MPWMD} Sleepy Hollow] facility) until it is safe to return them to the river. The Applicant or successor(s) in interest may choose to effect this mitigation through arrangement with organizations that are already involved with fish rescue on the Carmel River such as MPWMD and the Carmel River Steelhead Association...The Applicant or successor(s) in interest will obtain all necessary approvals and make all implementation arrangements for steelhead rescue prior to the construction of the new site basin and will provide proof of such permits and arrangements to the County.

As previously noted by NMFS, requesting exemption for take under the ESA to rescue steelhead in the future when take is anticipated does not comport with the intent of the ESA. Therefore, the project must minimize and avoid impacts to listed species, not plan for the rescue of steelhead that are expected to become stranded as a result of the project. Further, there is no evidence for the implication that MPWMD, the Carmel River Steelhead Association, the California Department of Fish and Wildlife and NMFS are willing, able, and interested in participating in such rescues. And there is no explanation, effects analysis, or justification for the Second FEIR's statement that steelhead becoming trapped in the sediment basin "would be infrequent and thus would not be expected to result in stranding of large numbers of steelhead that might affect population levels." We request the applicant work with our staff to develop a grading plan that resembles a more natural floodplain landscape and that avoids take of steelhead.

In summary, NMFS expects the Rancho Cañada Village Subdivision project, as currently proposed, will result in adverse impacts to S-CCC steelhead and their critical habitat. We offer our technical assistance with the development of a grading plan that: (1) minimizes surface runoff to the Carmel River; (2) protects water quality in the Carmel River; (3) aligns with concurrent floodplain restoration plans for the remainder of the former Rancho Cañada Golf Club; and (4) avoids perpetual take of S-CCC steelhead, and impacts to their habitat.

Please contact William Stevens at (707) 575-6066, or via email at William.Stevens@noaa.gov, if you have any questions concerning this letter.

Sincerely,



Amanda Ingham
Central Coast Branch Chief
North Central Coastal Office

cc: Dennis Michniuk, CDFW, dennis.michniuk@wildlife.ca.gov
Kim Sanders, CCRWQCB, kim.sanders@waterboards.ca.gov
Copy to: ARN# 151416SWR2008SR00093

To: Eric Lundquist

From: Margaret Robbins

Date: April 30, 2021

Re: Comments on the April 2021 second

Final Impact Report for Rancho Canada Village

The Rancho Canada Village FEIR is one of the most complete and detailed land use documents that I have read in over 20 years. For anyone not able to follow this project from the inception, it provides a clear path of how the project changed to what is before you today. While I am not delighted with the minor changes in Alternative 6B, I preferred Alternative 5 as detailed in the second revised draft EIR of 2020. However, it is long past time for me to nitpick and fuss over minor details. I ask that Alternative 6b be approved at the Planning Commission meeting on May 5, 2021. Thank you.

Margaret Robbins

Margaret Robbins

April 30 2021

3850 Rio Road #26, Carmel, CA 93923 (831) 624-1153