



March 27, 2018

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Subject: [River View Las Palmas Assisted Living Senior Facility Draft Subsequent EIR](#)

Dear Mr. Sidor:

LandWatch Monterey County has reviewed the Draft Subsequent Environmental Impact Report (Draft SEIR) for the project that is a facility on an undeveloped 15.64-acre parcel located within the Toro Area Plan and the Las Palmas Ranch Specific Plan. The proposed project includes a Specific Plan amendment, use permit, and design approval for the construction and operation of an approximately 120,000 square-foot senior assisted living facility consisting of multiple structures and associated site improvements. The facility would provide assisted living facilities for seniors requiring varying levels of assistance. LandWatch comments follow.

Project Description

The Draft SEIR does not identify or evaluate the Specific Plan amendment that is required for project approval.

Consistency with Applicable Plans

The Environmental Setting section references Table 3-1 Policy Consistency Review (Las Palmas Ranch Specific Plan, Monterey County 2010 General Plan, Toro Area Plan). However, this table is not included in the Draft SEIR. Specifically, is the project consistent with the residential unit cap of the Las Palmas Ranch Specific Plan?

Aesthetics

The Draft SEIR finds:

The proposed project would be within the existing view shed of public areas, including from areas that offer views of scenic vistas and from viewpoints on designated and proposed scenic roadways (State Route 68, River Road and Reservation Road). The proposed project would also alter the existing, natural visual character of the project site. Although the LPRSP FEIR concluded that visual impacts on Highway 68 would be less than significant with full

buildout of the specific plan area, including the project site, potential visual impacts of the proposed project are considered a significant adverse environmental impact....” (p. 5-30)

T-3.1 of the Toro Area Plan provides:

Within areas designated as “visually sensitive” on the Toro Scenic Highway Corridors and Visual Sensitivity Map (Figure 16), landscaping or new development may be permitted if the development is located and designed (building design, exterior lighting, and siting) in such a manner that will enhance the scenic value of the area.

Please describe how the development will “enhance the scenic value of the area”.

Mitigation Measures reducing impacts to less than significant are proposed. Mitigation measures include:

The site shall be landscaped and screened from view from State Route 68, River Road and Las Palmas to the extent feasible. (Emphasis added) (p. 5-29)

The EIR should identify feasible landscaping to determine if the impact to the view shed is reduced to less than significant.

Parking

The Las Palmas Ranch Specific Plan, Policy 3, requires that adequate off-street parking be provided as a means of reducing road congestion, particularly in areas where reduced road right-of-way is proposed. The Transportation and Traffic section does not address off-street parking.

Water Supply

The Draft SEIR finds that the 11.376 acre-feet per year required for the proposed project when completed, comprises approximately .05 percent of the California Water Service Salinas District’s demand by 2020 and approximately .04 percent of the projected year 2040 demand. Because the project demand is a small percentage of overall water use from the Salinas Valley Groundwater Basin, the Draft SEIR finds that the project’s water demand is not cumulatively considerable.

The use of a de minimis percentage of water demand is not an applicable threshold of significance for a groundwater basin that is in severe overdraft now and for the foreseeable future. CEQA Guidelines §15130(a).J. finds:

A project’s incremental impact may be individually limited but cumulatively considerable when viewed together with the environmental impacts from past, present, and probable future projects.

Along with the project’s significant and unavoidable cumulative impact on Highway 68 traffic, the project should also be found to have a significant and unavoidable cumulative impact on water supply.

Thank you for the opportunity to review the Draft SEIR.

Regards,

A handwritten signature in black ink, appearing to read "Michael DeLapa". The signature is written in a cursive style with a large, stylized "M" and "D".

Michael DeLapa
Executive Director