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July 8, 2010

Luis Osorio, Senior Planner
Monterey County Planning Department
168 West Alisal St., 2nd Floor
Salinas, CA 93901

SUBJECT: DEIR FOR CORRAL DE TIERRA NEIGHBORHOOD RETAIL VILLAGE

Dear Mr. Osorio:

LandWatch Monterey County has reviewed the project which would include 10 retail buildings, a one-story grocery store and a two-story office building, totaling 126,523 square feet and 508 parking spaces. We have the following comments:

1. Cumulative Projects List. The list does not include the following projects in the Toro area that are in the County's permitting process: Christensen (1 unit); Briggs (4); Tjs Development (1); PLN020526 (3); PLN04061 (1); Cdt. Prop. (4); Franscioni (4); Villalobos (4); Silva (2); Provost (1); Amaral (4); Bollenbacher (212); Johnson (4); Avila (11); and CDT Prop. (4) for a total of 259 units. The list should be updated and the cumulative impact analyses adjusted accordingly.
2. Surface Runoff. The DEIR states (p. 255) that groundwater recharge resulting from an on-site retention/detention system would total 10.04 afy and that this amount would help reduce the overall project water use of 11.34 afy, resulting in a net deficit of 1.30 afy.

Since the current site does not include impervious cover (p. 258), please identify the amount of water currently retained onsite and whether or not that amount was deducted from the 10.04 afy. As noted (p. 263), the project would have a significant and unavoidable impact to groundwater supplies after mitigation.

3. Consistency with General Plans. The subdivision component (Lot 1) of the Project is inconsistent with certain requirements of the County Code and therefore cannot be approved (pp. 301, 304 and 305). Based on these findings, the proposed project must either be revised or denied.
4. Traffic Analysis. The document states (p. 374) that the Harper Canyon project is 14 units. The Harper Canyon FEIR identifies the project as having 17 units.

The DEIR finds that with payment of the regional transportation fee, the project level impact would be less than significant. The fee would fund the State Route 68 Commuter Improvements - the widening project from Toro Park to Corral de Tierra. This project is programmed in the Regional Development Impact Fee Strategic Expenditure Plan for construction in the 2025-2030 period. Regional fees will cover \$5.9 million of the \$24 million estimated total cost. The source of the remaining funds is not identified yet. Without assurance that the project will be completed in a timely manner, project level impacts should be determined to be significant and unavoidable.

5. Project Alternatives. The reduced density/redesigned project would be the environmentally superior project. Traffic impacts would be similar to those of the proposed project. The DEIR finds this alternative would result in a net benefit to the groundwater basin and would not contribute to a cumulative impact to water supply (p. 478). The net benefit is based on 10.66 afy of recharge to the basin. Please identify the amount of water currently retained onsite and whether or not that amount was deducted from the 10.66 afy.

Thank you for the opportunity to review the document.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. White". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Amy L. White
Executive Director