



# LandWatch

monterey county

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June 24, 2010

Jay Brown, Chair  
Monterey County Planning Commission  
168 West Alisal St., 2nd Floor  
Salinas, CA 93901

SUBJECT: HARPER CANYON / ENCINA HILLS PROJECT

Dear Chair and Commissioners:

LandWatch Monterey County commented on the DEIR and the RDEIR. Based on our review of the project and responses to comments, we oppose the Harper Canyon project which would subdivide 344 acres into 17 lots in the Toro area. LandWatch opposes this project because a sustainable water supply does not exist, and the cumulative traffic impacts from this and myriad other projects in the area will create severe congestion on the already over-burdened roadways. Our comments follow:

### Water Supply

The FEIR identifies that source of water as wells within Zone 2C of the Salinas Valley Groundwater Basin. Based on our comments submitted on GPU 2010, the Salinas Valley Groundwater Basin is in severe overdraft, and the Salinas Valley Water Project as a source of a long term water supply is unreliable. The Final EIR on GPU 2010 identifies a water balance for the Salinas Basin that projects a tiny surplus as of 2030. This analysis is deeply flawed for the following reasons:

- The water balance analysis is based on baseline and projected water usage from the 2001 Salinas Valley Water Project (“SVWP”) EIR. The SVWP EIR assumed that there would be a net 1,849 acre decrease in agricultural land, whereas the 2007 General Plan EIR projects a net increase of at least 7,682 acres. Water for this increased agricultural acreage will eradicate the tiny surplus projected by the Final EIR and place the basin into substantial overdraft.
- The FEIR’s attempt to explain that the SVWP EIR remains an adequate basis to project future water supply and demand notwithstanding the increase in agricultural acreage double counts the savings the SVWP EIR projected from more efficient irrigation and changes in cropping patterns.
- The SVWP EIR baseline 1995 pumping assumptions understate actual pumping as of 1995 by 44,268 afy, based on annual pumping data reported by the MCWRA and included in the DEIR. The SVWP’s understatement of baseline pumping is two orders of magnitude greater than the 542 afy projected 2030 surplus in the FEIR. Despite this, the FEIR cites this actual pumping data to support its contention that the SVWP EIR “remains a solid basis” for evaluating future demand.
- The FEIR claims that the urban demand projections in the SVWP EIR are consistent with the FEIR’s water balance analysis, even though the FEIR projects a 46% greater urban population than the SVWP EIR. To make this claim, the FEIR “restates” the SVWP’s urban demand projection using fundamentally different population and water use assumptions, and making

unexplained “minor adjustments” that are an order of magnitude larger than the FEIR’s projected 542 afy surplus.

Traffic

The FEIR acknowledges that cumulative traffic impacts would be significant and unavoidable. Numerous projects along the Highway 68 corridor are either in the planning process or included in GPU2010. Major projects include Laguna Seca Villas (104 units); Bolendecker (212 units); Affordable Housing Overlay at the intersection of Reservation Road (356 units) and the Airport/Highway 68 AHO (976 units).

Intensification of development beyond that allowed on legal lots of record is unsupported until severe traffic congestion along this corridor is addressed and mitigation measures to meet the LOS standard are funded.

Thank you for the opportunity to comment.

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