



Testimony of Tom Ward, Board Member, LandWatch Monterey County  
To the Monterey County Planning Commission Regarding  
River View at Las Palmas  
October 9, 2019

Good morning. My name is Tom Ward, and I'm here today as a member of the Board of Directors of LandWatch Monterey County to voice our strong opposition to the proposed River View at Las Palmas.

As background, LandWatch supports sustainable, city-centered development and opposes unsustainable urban sprawl. This commercial project is urban sprawl. It will generate significant environmental impacts that could be avoided by relocating the project into the city of Salinas or another urban area.

The project is also inconsistent with the Monterey County General Plan and Las Palmas Specific Plan, including the Specific Plan's cap on residential units. The final EIR makes conflicting findings regarding the residential cap. In one section<sup>1</sup> the final EIR finds that the Specific Plan designation allows residential development on the project site, while other responses find the project is not residential development and thus not subject to the residential unit cap<sup>2</sup>. Which is it? Additionally, the draft EIR failed to provide consistency analyses for the general and specific plans requiring recirculation of the DEIR under CEQA<sup>3</sup>.

The final EIR fails to adequately evaluate the water supply. Its conclusions that, one, the impact from using additional groundwater from the Salinas Valley Groundwater Basin is less than significant and that, two, there is a sustainable water supply are at odds with current science.

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<sup>1</sup> Page 2, 7

<sup>2</sup> Responses 8.3 and 8.15 and Topical Response C

<sup>3</sup> CEQA Guidelines 15088.5(a)(4)

The Monterey County Water Resource Agency finds that the presumption of a long term sustainable water supply in General Plan Policies PS 3.1 and 3.2 can no longer be made due to the County's failure to complete the required water study. Without that rebuttable presumption, the County would need to demonstrate a long term sustainable water supply. Additionally, the Salinas Valley Groundwater Basin Sustainability Agency's Groundwater Sustainability Plan conclude that the sustainable yield of the basin is less than current pumping levels.

Finally, the failure of the draft EIR to provide noise baseline information and noise analysis also require recirculation under CEQA<sup>4</sup> because it denied the public meaningful opportunity to comments.

Las Palmas was clearly intended to be a residential community. Plopping a job-generating commercial project in a remote residential subdivision with no access to public transportation or services only adds to increased traffic and greenhouse gas emissions.

LandWatch urges you to deny this project.

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<sup>4</sup> CEQA Guidelines 15088.5(a)(4)