



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

October 31, 2006

Letter 2A
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Carl Holm
Monterey County Planning and Building Inspection
168 W. Alisal Street, 2nd Floor
Salinas, CA 93901-2680

Subject: 2006 Monterey County General Plan
SCH#: 2006021054

Dear Carl Holm:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on October 2, 2006. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2006021054) when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

2A-1

CALIFORNIA COASTAL COMMISSION

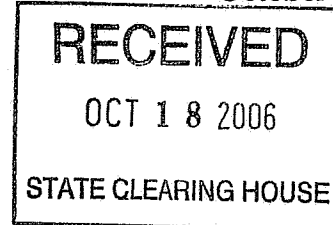
CENTRAL COAST DISTRICT OFFICE
 725 FRONT STREET, SUITE 300
 SANTA CRUZ, CA 95060
 PHONE: (831) 427-4863
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*Clear
 10-2-06
 [Signature]*

October 16, 2006

Mike Novo, Interim Director
 Monterey County Planning Department
 168 West Alisal Street, Second Floor
 Salinas, CA 93901



Letter 2A
 Page 2 of 4

2006021054

Subject: **Monterey County 2006 General Plan Draft EIR**

Dear Mike:

Thank you for the opportunity to comment on the Draft Program Environmental Impact Report on the Monterey County 2006 General Plan. Sorry we missed the deadline, but hopefully these comments will still prove useful as the County continues deliberations on the new General Plan. We have previously provided comments on the earlier version of the EIR (letter of April 2, 2004) and on the Notice of Preparation for the current document (letter of March 14, 2006) and assume that those comments will be responded to in the Final EIR. We have also previously provided comments on the General Plan drafts themselves, including, most recently our letter of July 25, 2006. Please ensure that to the extent that environmental impact information is necessary to address such comments, it is included in the Final EIR.

We note that to date it is not the County's intent to use any part of the General Plan document as a local coastal program amendment. We further understand that any local coastal program update amendments will happen in the future under a subsequent planning process. We remind the County that as part of any local coastal program amendment submittal, sufficiently detailed information needs to be included to allow our agency to review the amendment for conformity with Coastal Act requirements (Code of Regulations Section 13519). Often this information is generated through an EIR process. Thus, if the County changes its intent and decides to incorporate some provisions of the 2006 General Plan into its local coastal program, the County will need to ensure that the EIR contains the level of environmental analysis necessary to process and submit such an LCP amendment or will need to perform such additional analysis separately.

Accounting for these factors and due to limitations on our staff availability, we have only briefly reviewed the document. The following comments are generated based on our experience with such issues arising within the coastal zone:

Impacts AG-1 Loss of Farmland p.4.2-18, WR-2 Erosion p. 4.3-86, WR-4 Wastewater Disposal p.4.3-89, and possibly others: Mitigation measures AG-1, WR-2, WR-3A, and WR-3B require additional agricultural controls on agricultural practices. However, General Plan policy AG 3.3 exempts several agricultural uses that could cause the noted impacts from following other Plan policies. Thus, if these mitigation measures were added to the General Plan, their application would be limited. Please address how adverse impacts to water quality and aquatic habitats will be avoided in light of these exemptions.

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 Cont.

Water Resources Project Impacts (Section 4.3.4) Thresholds of Significance p. 4.3-78: Missing is a discussion of excessive surface water withdrawals.

Impact WR-6 Saltwater intrusion p. 4.3-100: Mitigation measure WR-6 requires pump tests or studies for new high-capacity wells. Aren't controls also needed on additional withdrawals from existing wells just outside of impacted areas serving additional development in such areas?

Impact WWR-7 also requires pump tests or studies for new high-capacity wells. What about just regular wells in limited supply areas of fractured bedrock? Also, what are adequate pump test requirements especially for such situations?

Impact WR-10 Flooding p. 4.3-108: New development is allowed in the flood plain, if it raised. Because of this, no adverse flooding impacts are recognized. But, is it really true that in a major flood, those raised structures and their occupants will not be impacted? Would rushing debris harm these structures? How will the occupants safely evacuate if the surrounding area is flooded? What is the potential for development in the flood plain to result in flooding elsewhere by displacing water that would otherwise be contained within an undeveloped flood plain?

Chapter 4.4 Geology: No analysis of the impacts of bluff erosion either from the ocean or from above is included even though the number of seawall and bluff protection proposals appears to be increasing. As noted above, we understand that it is not the County's intent to apply the updated General Plan to the coastal zone, and we assume this is the reason why the Draft EIR lacks such an analysis. However, to the degree that the policies of the updated General Plan may be looked to for purposes of future LCP amendment, we note that a much more detailed analysis of the adequacy of measures proposed to address hazards such as coastal erosion, sea level rise, and tsunamis will be needed.

Transportation Project Impacts (Section 4.6.4) Threshold of Significance p. 4.6-26: The Draft EIR uses the proposed General Plan's Level of Service thresholds as its significance thresholds. However, the purpose of the EIR is to evaluate the General Plan proposals. The Draft EIR should evaluate whether these proposed chosen levels have an impact on the environment. For example, perhaps they are too low because even if met, there will still be unacceptable traffic and its air pollution and other consequences. Or maybe, they are too high because to meet them will cause unacceptable environmental damage from new road construction, global warming from gasoline use, use of scarce fossil fuels, less funding available for alternative transportation modes.

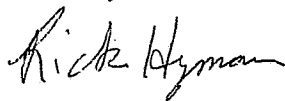
Chapter 4.9 Biological Resources: The draft EIR establishes as a threshold of significance: adverse effects on special status species in local or regional plans, policies or regulations. As can be read, this threshold extends beyond just State and federally listed species that receive the most proposed General Plan protection. However, except for a mention of area plan protection of certain trees under Impact BIO-4 (p. 4.9-24), there is no follow-up analysis in the draft EIR of impacts to rare or especially valuable local biological resources other than State and federally listed species.

Environmental Impacts State Regulatory Framework (Section 4.9.3) p.4.9-12: The California Coastal Act and its environmentally sensitive habitat protection policy are not mentioned.

We hope that these comments are helpful. We look forward to seeing a revised final EIR and 2006 General Plan that addresses these and previous comments that we have submitted. We may continue to have additional input as the process unfolds.

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Cont.

Sincerely,



Rick Hyman
District Chief Planner

cc: OPR Clearinghouse
AMBAG Clearinghouse