

October 6, 2006

Mr. Lew Bauman, County Administrative Officer
County of Monterey
168 West Alisal Street, 3rd Floor
Salinas, CA 93901

Via Fax: 757-5792

Via Email: bauman@co.monterey.ca.us

Subject: Monterey County General Plan and Environmental Impact Report

Dear Mr. Bauman:

The City of Monterey would like to thank Alana Knaster and Carl Holm for presenting the Monterey County General Plan and Environmental Impact Report to the City's Planning Commission. It facilitated our review and many of our questions were answered.

The City's primary policy issue with the General Plan and Environmental Impact Report is to ensure that future infrastructure is coordinated with development proposals (See Policies Below). The following policies appear to address this issue, although the City requests clarification that "County roads" include roadways within a city's jurisdictional limits:

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C-1.3 In order to achieve a countywide LOS D in conjunction to Policy C-1.2, projects that are found to result in reducing a County road below LOS D shall not be allowed to proceed without a phasing program where development is concurrent with improvements that maintain a minimum of LOS D for all affected County roads. Where the LOS of a County road impacted by a specific project currently operates below LOS D and is listed on the CIFP as a top priority, Policy C-1.4 shall apply.

C-1.4 Direct on-site Adequate Public Facilities and Services (APFS) and direct off-site APFS circulation improvements that will maintain or restore LOS D or the applicable LOS shall be constructed concurrently with new development. Off-site circulation improvements which mitigate cumulative impacts either shall be constructed concurrently with new development or a fair share payment shall be made. Support collection of regional impact fees to address impacts to regional roads and highways.

LU-1.4: Growth areas shall be designated only where an adequate level of services and facilities such as water, sewerage, fire and police protection, transportation and schools exists or can be assured concurrent with growth and development...."

LU-1.11 Outside of cities, community areas, rural centers and areas where urban services, such as public water systems and public wastewater systems exist only low to very low residential density development shall be allowed.

The City does recommend some amendments to the current plan. A definition is needed for the concept of "urban reserve" described on the Land Use Plan Map. The City supports the definition provided verbally by County staff that urban reserve means the County will be required to "consult with cities" if a development is proposed. Please explain how the consultation process will work. This process/definition should be included in the document.

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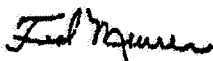
The forested hillsides surrounding the Monterey Peninsula are ecologically and aesthetically important to our residents. There are several policies in the Greater Monterey Peninsula Area Plans that refer to redwood forest habitat. We assume that is an error and should be amended to address the Monterey Pine Forest (GMP policies 3.5, 4.1).

Lastly, the City of Monterey has significant concerns about the County Planning Commission's recommendation to place substantially more housing units at the Paquin property on Monhollan Road. This is a rural area and is located on the fringe of all infrastructure systems. The Environmental Impact Report must be amended to address this significant change in land use policy for the Greater Monterey Peninsula planning area. The site has significant constraints due to the large ravine that bisects the property. A fragile stream drainage system exists downstream and is at risk and would undoubtedly experience increased erosion and water quality degradation with a large housing development. With increased development, this area is seriously at risk for flooding. The City's sewerage system is also inadequate to accommodate this development, and at this time the City does not support connection. In sum, this proposed change in land use policy conflicts with the proposed General Plan policies LU-1.4, LU-1.11, C-1.3, and C-1.4. The Environmental Impact Report must be amended to address this policy change.

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In closing, the City thanks you for this opportunity to provide comments. Please do not hesitate to contact Senior Planner Kimberly Cole at 831-646-3759 with any questions.

Sincerely,



Fred Meurer
City Manager

- c: City of Monterey Mayor and City Council
City of Monterey Planning Commission
City of Monterey City Manager
City of Monterey Community Development Director
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