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October 6, 2006

Carl Holm, Planning Manager  
Monterey County Planning Department  
168 W. Alisal Street  
Salinas, CA 93901

Dear Mr. Holm:

The Monterey County Association of REALTORS® submits the following comments on the Draft Program Environmental Impact Report (DEIR) for the Monterey County 2006 General Plan (GPU4).

**Page 4.6-7: LOS Standard for 1982 General Plan.**

**Issue:** The DEIR states the current standard for Level of Service (LOS) under the 1982 General Plan is LOS "C". However, the 1982 General Plan does NOT contain any policy establishing a LOS standard. The only policy in the 1982 General Plan addressing level of service is Policy 37.2.1, which reads as follows:

*"Transportation demands of proposed development shall not exceed an acceptable level of service for existing transportation facilities, unless appropriate increases in capacities are provided for."*

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**Recommendation:** Based on the discussions in the introduction to the element and in the EIR, it must be concluded that a level of service better than "E" or "F" is an acceptable LOS. Therefore, LOS "D" as proposed in GPU4 is not a departure from the current 1982 General Plan.

**Page 4.3-83-86: Construction-Related Soil Erosion Sedimentation**

**Issue:** The DEIR states that ministerial permits shall be required for development on existing lots of record on slopes greater than 15%, or 10% or more on highly erodible soils. The science and mapping for these percentages are not identified nor justified. Furthermore, the DEIR does not acknowledge existing County permits required for grading, or other required statewide regulations and permits that control and mitigate water run-off. Additional permitting requirements could potentially reduce the availability of land for new housing, thus limiting the creation of new housing. This would also increase the overall costs of both pre-existing and new housing.

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**Recommendation:** Reject the requirement for ministerial permits for development on existing lots of record on slopes greater than 15%, or 10% or more on highly erodible soils. Such mitigation is an unnecessary and unsubstantiated change from existing policies.

Thank you for the opportunity to submit our comments on these important issues. We look forward to your responses, and to supporting a legally adequate Final EIR.

Sincerely,

Sheryl McKenzie, Government Affairs Director  
MCAR Representative, Refinement Group

Tom Rowley, REALTOR®  
MCAR Alternate, Refinement Group

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