



October 6, 2006

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

RE: Draft Program Environmental Impact Report
2006 Monterey County General Plan

Dear Mr. Holm:

Thank you for the opportunity to submit a written response to the Draft Environmental Impact Report (DEIR) as a part of the public process of preparing the County's General Plan Update (GPU). Common Ground Monterey County is composed of local residents involved in the agriculture industry, hospitality industry, education, affordable housing builders and advocates, and construction. We advocate for the responsible stewardship of the resources of Monterey County.

We are particularly concerned about two issues:

- (1) Maintaining the viability of the agriculture industry and thereby retaining the rural character of the County and
- (2) Providing an adequate, predictable supply of housing for Monterey County residents.

While the DEIR is the result of studies undertaken by professionals, and reflects their expertise, we are concerned about a number of the conclusions and mitigation measures which I will outline below.

2:1 Mitigation for loss of agricultural land: DEIR page #4.2-18

The DEIR purports to show that regardless of the mitigation, a significant unavoidable impact will result as Important Farmland is converted to any new, agricultural or non-agricultural use.

In fact, however, Monterey County is actually gaining farmland, not losing it. The 2005 Monterey County Crop Report, published by the County's Agricultural Commissioner, contains a table called "Trends of Major Crops in Monterey County." This table shows that in 1985 there were 260,994 irrigated acres in production. In 2005, this figure has grown to 287,186 acres, a 10% increase. Excluding grape production, there is still a 7% gain in irrigated land.

16-1

We would like to point out that requiring a 2:1 mitigation will not solve the problem, and in fact will make it worse. Farmland will become more expensive as increased demand for conservation easements is likely. In effect, this will encourage the loss of farmland, not mitigate for it.

16-1 Cont.

Further, when cities are forced to purchase conservation easements at a 2:1 ratio for annexed land, there will be an inevitable increase in home prices and the creation of housing will be discouraged. A case in point is the 2,400 acres that the City of Salinas plans to annex. We believe the City is growing in the right direction—away from the best farm land in the Blanco district, and toward the more marginal farm land to the north and east. But requiring the City to pay double for their annexation could make such an annexation impossible.

16-2

Routine and Ongoing Agricultural Activities: DEIR page 3-93

In the last paragraph of this page, the DEIR says that "Routine and ongoing agriculture activities are exempted from the goals and policies of the 2006 General Plan." We believe that the intent of the 2006 General Plan is to relieve the agriculture industry from being overburdened by regulation. Monterey County agriculture competes in the global market place and requires the regulatory framework to do so.

16-3

The planning staff has worked in conjunction with the Agricultural Advisory Committee to come up with exemptions from General Plan policies, not exemption from permitting requirements. This needs to be made clear.

Special Status Species: DEIR page 4.9-20

The DEIR suggested mitigation measure OS-5.x states that "Prior to the approval of any development project that could potentially disturb a special status species, the County shall require the project applicant to conduct a biological survey of the site for Federal and State designated special status species and document the results in a Biological Report."

16-4

We applaud the use of the phrase "Federal and State designated special status species," because it avoids duplication and overlapping of regulatory agencies. We would, however, suggest that this also include a reference those species that are actually *listed* on state or federal lists.

The creation of housing in Monterey County has often been delayed or entirely stifled due to overlapping regulation. An example are the housing developments at Fort Ord, where there are 63 state and federal agencies involved, creating a quagmire of regulation and a wait of more than 10 years for housing to become a reality.

Agriculture on slopes: DEIR page 4.3-89

The DEIR mitigation measure called WR-3A would require a new policy under the "Soils" section of the Open Space and Conservation Element that would state:

16-5

OS-3.x A ministerial permit process shall be developed and implemented for agricultural land conversion projects on slopes greater than 15 percent, or 10 percent or more on highly erodible soils. The permit process shall require that an erosion control plan be developed and implemented for all disturbed lands where new cultivation is proposed. Routine and on-going agricultural activities are exempt from this requirement.

16-5 Cont.

This measure seems extreme, and would apply to very gentle slopes. It should be noted that the use of sloped land for vineyards has been a long-standing practice in many parts of the world, and contributes to the farmland available. There is no reference in the DEIR as to where or how these slope percentages were chosen, nor any scientific evidence presented. In order to maintain agricultural viability, we need to have the flexibility to use sloping land.

Level of Service (LOS): DEIR page 4.6-7

The DEIR states that the LOS contained in the County's current General Plan (the 1982 General Plan) is LOS C. This, however, is not the case. While the 1982 Plan does make reference to LOS "C" in the text, it is mentioned as an "objective" and is not contained in any policy language.

The policy in the 1982 Plan that does address LOS says that,

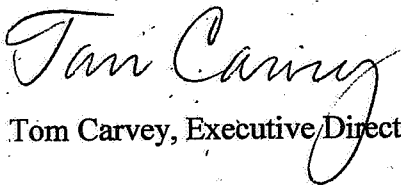
Transportation demands of proposed development shall not exceed an acceptable level of service for existing transportation facilities, unless appropriate increases in capacities are provided for." (Policy 37.2.1, 1982 GP)

16-6

The DEIR is therefore incorrect in the statement that LOS will be degraded from LOS C to LOS D.

Again, thank you for the opportunity to comment, and we look forward to continuing to participate in the very open, public process of developing an adequate EIR and a General Plan that provides for agricultural viability and housing opportunities for the residents of Monterey County.

Sincerely,



Tom Carvey, Executive Director