Chapter 7
Comment Letters

This chapter contains the written comments received on the DEIR. The comments and responses are grouped in five categories: federal agencies, state agencies, local agencies, organizations, and individuals. Table 7-1 below identifies the commenters and assigns a number to their correspondence. Where more than one letter or correspondence was received from a commenter, the letters are given alphabetic subscripts with the commenter's number. For example, the numbers O-1a and O-1b would be applied to two letters that were submitted by the same organization.

The individual comment letters are marked to identify the specific issues raised in the letter, and numbered accordingly in the margin. The responses are organized in accordance with the appearance of the comment in the letter. So, response O-1a.1 would respond to the first comment in letter O-1a, response O-1a.2 to the second comment, and so on.

To reduce the size of this chapter, most comment letters have been reproduced two pages per printed page. Accordingly, most printed pages comprise two numbered pages.

Table 7-1. List of DEIR Commenters

Comment Letter Number	Commenter	Page Number
Federal Agencies		
F-1	U.S. Dept. of Commerce - National Oceanic and Administration Fisheries	7-5
State Agencies		
S-1	California Coastal Commission	7-9
S-2	California Department of Conservation	7-12
S-3	California Department of Fish And Game	7-14
S-4	Department of Forestry and Fire Protection	7-23
S-5	Department of Toxic Substances Control	7-34
S-6	California Department of Transportation, District 5	7-37
S-7	Native American Heritage Commission	7-41
S-8a	Office of Planning and Research (transmittal letter)	7-44
S-8b	Office of Planning and Research (transmittal letter)	7-48
S-8c	Office of Planning and Research (transmittal letter)	7-53
S-9	California Regional Water Quality Control Board, Central Coast Region	7-56

Comment Letters
Federal Agencies

F-1

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
777 Sonoma Ave., Room 325
Santa Rosa, CA 95404-4731

October 17, 2008

In response refer to:
151416SWR2008SR00380

Monterey County
Planning and Building
Inspection Administration

OCT 20 2008

RECEIVED

Carl Holm, Assistant Director
Monterey County Planning Department
168 W. Alisal Street, 2nd Floor
Salinas, California 93901

Dear Mr. Holm:

Thank you for the opportunity to comment on the September 2008 Draft Environmental Impact Report (DEIR) for the 2007 Monterey County General Plan. NOAA's National Marine Fisheries Service (NMFS) received a notice seeking written comments on the DEIR on September 5, 2008. Our comments on the September 2008 DEIR for the 2007 Monterey County General Plan are provided below. Please also refer to our October 2, 2006, comments we provided to the Monterey County Planning Department on the County of Monterey's Draft Program Environmental Impact Report for the 2006 Monterey County General Plan.

Many rivers, streams, and creeks within Monterey County support federally-threatened South-Central California Coast (S-CCC) Distinct Population Segment (DPS) steelhead (*Oncorhynchus mykiss,* 71 FR 834). Many of theses watercourses are designated as critical habitat for S-CCC steelhead (70 FR 52488). NMFS is responsible for the protection of S-CCC steelhead pursuant to the Federal Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*) and implementing regulations promulgated thereunder. 1

NMFS has determined the S-CCC steelhead DPS is suffering a significant decline in overall abundance and productivity, is becoming increasingly fragmented, and that four sub-populations have become or are nearly extirpated. These population trends in conjunction with the large scale anthropogenic influences (*e.g.*, water diversions, the influences of large dams, agricultural practices [including irrigation], urbanization, loss of wetlands and riparian areas, roads, grazing, gravel mining, and logging) on habitat conditions lead to the conclusion that this DPS continues to decline toward extinction. Further adverse effects to steelhead and their designated critical habitat as a result of water use are of primary concern to NMFS relative to the DEIR.

Specific comments

Page 4.3-14 refers to "the central coast steelhead", but should be changed to South-Central California Coast steelhead. 2

F-1

2

Page 4.3-78 states, "Work in Salinas River and Arroyo Seco River channels is exempted if it is covered by a (U.S. Army Corps of Engineers) 5-year regional Section 404 permit, approved by the (California Department of Fish and Game), and approved by the (Monterey County Water Resources Agency)." This sentence is incorrect. The existing 5-year regional Section 404 permit expires on October 31, 2008, and does not include any channel maintenance activities in the Arroyo Seco River. We expect the Monterey County Water Resources Agency will apply for another 5-year regional Section 404 from the U.S. Army Corps of Engineers, which will require Federal Endangered Species Act consultation between NMFS and the U.S. Army Corps of Engineers; we do not expect the Monterey County Water Resources Agency will propose to authorize channel maintenance activities in the Arroyo Seco River. 3

Page 4.3-97: We support the development and adoption of a stream setback ordinance. Setbacks must be adequate to (1) sufficiently remove harmful human activities near watercourses, and (2) prevent the need for costly and invasive human interventions in the stream ecosystem. The stream setback ordinance should apply not only to those rivers and creeks listed on page 4.3-97, but to all watercourses supporting steelhead. We would like to work with Monterey County on the development of a stream setback ordinance because local regulations affecting stream corridor health and function directly affect our ability to conserve and protect steelhead and their habitat. 4

Page 4.3-103; Area Plan Policies: Although some Area Plans have supplemental policies supporting water quality protection related to construction impacts on soil erosion and sedimentation, all Area Plans should have policies regarding construction-related soil erosion and sedimentation. 5

Page 4.9-1: The DEIR should acknowledge that NMFS has listed approximately 472 miles as designated critical habitat in Monterey County for S-CCC DPS steelhead and describe how the General Plan will avoid impacts to steelhead critical habitat. 6

Page 4.9-1: The DEIR does not address lagoons/estuaries within Monterey County. The DEIR should describe how the General Plan will avoid impacts to these important habitats. 7

Page 4.9-48: When referring to the issuance of a biological opinion, the DEIR should state that NMFS, in addition to the U.S. Fish and Wildlife Service, also issues biological opinions. 8

Page 4.9-47; Endangered Species Act: The ESA was enacted to identify species at risk of extinction, to provide a means to help such species recover, and to protect the ecosystems of which declining species are a part. Section 9 of the ESA prohibitions on 'take' applies to the activities of everyone – every state, city, and county government, every business, and every citizen. Local agencies are liable under the ESA for issuing permits which result in take of federally-protected species.

In addition to sections 7 and 10 of the ESA, section 4(d) has rules that include a set of limits on the application of the ESA 'take' prohibitions for specific categories of activities that contribute 9

F-1

to the conservation of listed steelhead or adequately limit their adverse impacts. The limits can be thought of as exceptions to the 'take' prohibitions. 9

One of the limits, Limit No. 12 – Municipal, Residential, Commercial and Industrial Development and Redevelopment (MRCI), may be applicable to Monterey County. As a general matter, MRCI development (and redevelopment) has a significant potential to degrade habitat and injure or kill steelhead in a variety of ways. With appropriate safeguards, MRCI development can be specifically tailored to minimize impacts on listed fish to the extent that additional Federal protections would not be needed to conserve the listed DPS. To be approved for a limit on ESA 'take' prohibitions, a program must adequately contribute to the conservation of salmonids and meet their biological requirements. By providing limitation from take liability, NMFS encourages governments and private citizens to adjust their programs and activities to be "salmon safe". For more information, contact NMFS or see http://www.nwr.noaa.gov/ESA-Salmon-Regulations-Permits/4d-Rules/Index.cfm. 10

Page 4.9-55, Section 4.9.5.2: "NMFS" should be added to the end of the first two paragraphs, to read …"or regulations, or by the CDFG, USFWS, or NMFS…". 11

Page 4.9-74: Pursuant to Mitigation Measure BIO-1.3, we recommend the County contact NMFS when proposed projects may affect steelhead or their habitat. If the project will not take or harm listed fish, then there is no need to modify the activity, or to contact NMFS. If, however, after reviewing the project, it seems likely it will take or harm listed fish, or there is uncertainty about whether take or harm may occur, the acting agency, entity, or individual should contact NMFS to seek more information on evaluating the project's impacts and determining ways to avoid harming the fish and violating the ESA. 12

Thank you again for the opportunity to comment on the DEIR and we look forward to working with the County in the future. Please contact Mr. Bill Stevens at (707) 575-6066, or via e-mail at William.Stevens@noaa.gov, if you have any questions concerning these comments.

Sincerely,

Dick Butler
Santa Rosa Area Office Supervisor
Protected Resources Division

cc: Russ Strach, NMFS, Sacramento

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Federal Agencies

This page intentionally left blank.

Comment Letters
State Agencies

Feb-02-09 04:38pm From-Coastal Commission 831-4274877 T-402 P.002/003 F-052 69

STATE OF CALIFORNIA – THE RESOURCES AGENCY ARNOLD SCHWARZENEGGER, Governor

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877

S-1

February 2, 2009

Carl Holm, Assistant Director
Monterey County Planning Department
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

Subject: **Monterey County 2007 General Plan Draft EIR**

Dear Mr. Holm:

Thank you for the opportunity to comment on the Draft Program Environmental Impact Report (EIR) for the Monterey County 2007 General Plan. Please note that we have previously provided comments on the earlier version of the EIR (letter of April 2, 2004), on the Notice of Preparation for the EIR for the 2006 General Plan document (letter of March 14, 2006), on the Draft EIR for the 2006 General Plan document (letter dated October 16, 2006), and on the General Plan drafts themselves, including, most recently our letter of July 25, 2006. Please continue to consider those previous comments as the County moves forward with subsequent General Plan drafts and environmental review. The purpose of this letter is not to reiterate those past comments, but rather is provide some general feedback regarding the relationship of the General Plan to the Local Coastal Program (LCP) and related CEQA documents. 1

As we have noted previously, we understand it is not the County's intent to use any part of the General Plan document as the basis for an LCP amendment or update. We further understand that any such LCP update amendments pursued by the County will be pursued separately in the future through their own planning processes. As a result, and due to ongoing budget and staffing shortfalls, we have not thoroughly reviewed the current documents, preferring instead to allot our available review time to future coastal zone documents and proposals. However, despite indications in the text that the General Plan and EIR are meant to cover only the inland portions of the County, cursory review of the EIR document indicates that a significant amount of data collection appears to have been included for the coastal zone portion of the County, and is represented in various exhibits, tables, and text throughout the document (e.g., the Biological Resources chapter shows and describes vegetation cover, special-status species, and habitats in the entire County). Although we understand the need to provide overall context in the EIR, given the County's stated position regarding the General Plan's lack of relationship to the coastal zone, we have not reviewed this information in relation to coastal zone resources and potential LCP updates and/or amendments related thereto. Please clarify if our understanding is incorrect, and the EIR/General Plan is intended to form the basis for future LCP planning. If so, we may have more comments for you. 2

Feb-02-09 04:38pm From-Coastal Commission 831-4274877 T-402 P.003/003 F-052

In any event, we look forward to seeing a revised final EIR that addresses these and previous comments that we have submitted. Please contact me if you have any questions or would like to discuss our comments further.

Sincerely,

Katie Morange

Katie Morange
Coastal Planner

cc: OPR Clearinghouse
AMBAG Clearinghouse

Feb-02-09 04:38pm From-Coastal Commission 831-4274877 T-402 P.001/003 F-052

California Coastal Commission
Central Coast District Office

FAX TRANSMITTAL

DATE: 2/2/09	NUMBER OF PAGES (INCLUDING COVERSHEET): 3
PLEASE DELIVER TO: Carl Holm	FROM: Katie Morange
COMPANY:	CALIFORNIA COASTAL COMMISSION 725 Front Street, Santa Cruz, CA 95060-4508 Phone: (831) 427-4863 Fax: (831) 427-4877
PHONE NUMBER:	
FAX NUMBER: 757-9516	

Please notify sender if you do not receive a clear or complete copy of this transmittal

REGARDING: General Plan DEIR comments

California Coastal Commission - Central Coast District Office

Feb-02-2009 16:31 From-DIVISION OF LAND RESOURCE PROTECTION 16163273430 T-578 P.001/002 F-381

67

NATURAL RESOURCES AGENCY — ARNOLD SCHWARZENEGGER, GOVERNOR

DEPARTMENT OF CONSERVATION

S-2

DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 10-01 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-0850 • FAX 916 / 327-3430 • TDD 916 / 324-2555 • WEBSITE conservation.ca.gov

Monterey County
Planning and Building
Inspection Administration
FEB 02 2009
RECEIVED
Faxed 2/2/09
4:31 pm

February 2, 2009

VIA FACSIMILE (831) 757-9516
Mr. Carl Holm, Assistant Director
Monterey County Resource Management Agency
168 West Alisal Street, 2nd Floor
Salinas, CA 93901-2680

Dear Mr. Holm:

Subject: Draft Environmental Impact Report (DEIR) for the 2007 Monterey County General Plan

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the DEIR for the referenced project. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's impacts on agricultural land and resources.

1

Project Description

The 2007 General Plan is a comprehensive update to the existing 1982 Monterey County General Plan providing goals and polices to guide future development and to preserve natural and agricultural resources from urban encroachment to 2030. The 2007 Plan covers all unincorporated portions of the County. The 2007 General Plan directs urbanization to incorporated cities and to designated Community Areas and Rural Centers. As maximum development potential is not expected to occur during the 2007 planning horizon, the Plan also provides analysis for longer-term full build out to 2092.

Important Farmlands

2

The DEIR states there are 236,142 acres identified as Important Farmland and 1,065,577 acres of grazing land. 763,396 acres are protected under Williamson Act contracts, Farmland Security Zone (FSZ) or other enforceable restrictions as of 2007. The DEIR does an admirable job of discussing the existing environmental setting. We suggest the following be included in the Final Environmental Impact Report (FEIR) related to changes in agricultural resources proposed by implementation of the 2007 General Plan.

The DEIR references that additional information pertaining to the Department's Important Farmland Mapping and Monitoring can be found under section 4.2.2 (see section 4.2.3.3, reference to regulatory framework). The reference is incorrect; the correct reference is 4.2.4.

Grazing lands are an important natural/agricultural resource in Monterey County. The Department suggests the FEIR include the Department's Monterey County Important Farmland Map. The 2006 Map is available at the Department's website and indicates the location of grazing lands in the County.

The Department of Conservation's mission is to balance today's needs with tomorrow's challenges and foster intelligent, sustainable, and efficient use of California's energy, land, and mineral resources.

Feb-02-2009 16:31 From-DIVISION OF LAND RESOURCE PROTECTION 18189273430 T-578 P.002/002 F-391

Mr. Carl Holm, Assistant Director
February 2, 2009
Page 2 of 2

S-2

The DEIR indicates that implementation of the 2007 General Plan will result in the conversion of 2,571 acres of important farmland to urban land uses. Of this amount, 476 acres of important farmland are within incorporated cities Sphere of Influence. The DEIR states that conversion of the remaining acreage is most likely to occur in the Community Areas of Boronda, Castroville, Chualar and Pajaro. The Department recommends the FEIR include a table indicating the estimated breakdown of important farmland acreage figures per Area Plan. The table could be similar to Table 4.9-2 that indicates the approximate acreage of different vegetation types by Community Areas. 2

The Department supports the County's proposed policy to adopt and implement a program to mitigate for the loss of important Farmland resulting from a change of land use designation or annexation. Until the program is established, the County may wish to consider that the California Farmland Conservancy Program is authorized to accept donations of funds if the Department of Conservation is the designated beneficiary and it agrees to use the funds for purposes of the program in a county specified by the donor. 3

Williamson Act Lands

The Department recommends that the County's more restrictive Williamson Act contract terms (20-year versus 10-year) be included in the discussion of Williamson Act contracts in Section 4.2.4.1. Additionally, we recommend that Exhibit 4.2.2 be replaced with the Monterey County 2007 Williamson Act Map. The map is available from the Department website and provides a comprehensive picture of the County Williamson Act prime and nonprime lands, Farmland Security Zone lands and lands undergoing nonrenewal of the contract.

The DEIR states that implementation of the 2007 General Plan will result in the conversion of 6,874 acres of Williamson Act land to urban uses. The DEIR also indicates that 299 of the 6,874 acres designated for conversion, are located within the Spheres of Influence of the County's incorporated cities. The Department suggests the FEIR breakdown the 6,874 acres to the number of Williamson Act prime and nonprime acres. Additionally, the FEIR could include a table that provides readers a breakdown of where conversion of Williamson Act acreage is expected, i.e. 40 Williamson Act prime acres in the City of Castroville. 4

Thank you for the opportunity to comment on the DEIR. If you have questions on our comments, or require technical assistance or information on agricultural land conservation, please contact Adele Lagomarsino at 801 K Street, MS 18-01, Sacramento, California 95814; or, phone (916) 445-9411.

Sincerely,

Dan Otis
Program Manager
Williamson Act Program

cc: State Clearinghouse

n

02-03-09 18:46 FROM-DFG 559 2433004 T-282 P.002/009 F-906

94

STATE OF CALIFORNIA - THE RESOURCES AGENCY
DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005

S-3

Monterey County
Planning and Building
Inspection Administration

RECEIVED
rec'd faxed 2/3/09
4:46 pm

February 3, 2009

Carl Holm
Resource Management Agency –
Planning Department
County of Monterey
168 West Alisal, 2nd Floor
Salinas, California 93901

Subject: Draft General Plan 2007 (DGP)
Draft Environmental Impact Report (DEIR)
SCH No. 2007121001

Dear Mr. Holm:

The Department of Fish and Game has reviewed the Monterey County Draft General Plan 2007 and the Draft Environmental Impact Report (DEIR) which addresses the adoption of the General Plan Update. We recognize this draft represents a monumental effort to update the 1982 General Plan and commend the County on its efforts to address the challenges of balancing various and competing needs into the foreseeable future. We endorse the guiding objectives of the DGP, and offer comments with the intent of supporting implementation of those objectives. 1

The Department's comments are focused on helping the County identify and conserve the unique and characteristic natural resources found throughout Monterey County. We recognize the desirability of concentrating growth into those areas where there is existing or planned infrastructure and insuring the continued viability of agricultural lands in the County. We believe both these objectives are consistent with the objective of protection of areas of important natural resources. We offer the following comments to aid in general plan implementation and protection of public trust resources.

California Environmental Quality Act (CEQA) Authority: The Department is a Trustee Agency with the responsibility under CEQA for commenting on projects that could impact fish and wildlife resources. Pursuant to Fish and Game Code Section 1802, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. As a Trustee Agency for fish and wildlife resources, the Department is responsible for providing, as available, biological expertise to review and comment on environmental documents and impacts arising from project activities, as those terms are used under CEQA. 2

Conserving California's Wildlife Since 1870

S-3

Habitat Connectivity: The Department supports incorporating open space goals and policies to provide for habitat connectivity between conservation lands within the County and between neighboring counties. California's Wildlife Action Plan (http://www.dfg.ca.gov/wildlife/wap/report.html) directs us to work with local agencies to protect large, relatively unfragmented habitat areas, wildlife corridors, and under-protected ecological community types. The Department recommends a comprehensive approach to producing a map of existing and potential open space areas and a wildlife corridor system to connect those areas.

The Western Governor's Association (WGA) recently recognized the importance of maintaining wildlife corridors and crucial wildlife habitat with a 2007 policy resolution entitled "Protecting Wildlife Migration Corridors and Crucial Wildlife Habitat in the West." The WGA 2008 "Wildlife Corridors Initiative Report" summarized the importance of open spaces and wildlife corridors: "Large, intact and functioning ecosystems, healthy fish and wildlife populations, and public access to natural landscapes contribute to the West's quality of life and economic well-being. Important wildlife movement corridors and crucial wildlife habitats within these landscapes are critical to maintaining these Western qualities". The full report can be found at (http://www.westgov.org/wga/initiatives/corridors/index.htm). 3

Development, agricultural conversion, and overuse of water resources increasingly isolate the County's open space areas and reduce their fish and wildlife habitat values. Many of the protected open space areas are too small to maintain viable isolated wildlife populations. In many cases, only the surrounding unprotected open space areas allow species to persist within the protected areas by providing larger habitat patches and corridors connecting to larger habitat patches. Maintaining species diversity within open spaces will require expanding protected areas and maintaining habitat connectivity between them. Incorporating wildlife corridors into the Conservation and Open Space Element would facilitate species conservation and, therefore, maintain the value of open space within Monterey County.

To facilitate conservation of habitat linkages, the Department recommends that the general plan include an overlay map of linkages required to maintain wildlife populations in protected areas and other important habitat patches which are likely to remain undeveloped. Without a map representing the important linkages, planning efforts are likely to slowly erode remaining habitat connectivity and result in projects with significant, unmitigated impacts. A general connectivity map can be developed without being parcel-specific. General plan policy should be developed to protect connectivity in the mapped linkages.

S-3

Some important linkages to maintain and/or enhance include the following: Santa Lucia to Gabilan Mountains, Gabilan/Diablos to Santa Cruz Mountains, Santa Lucias to Fort Ord, and the Monterey Peninsula to Santa Lucias. The Department would be happy to work with you on mapping these linkages, identifying other important linkages, and developing effective policy for their maintenance. 3

Goal AG-4 Proposed Winery Corridors: The proposed winery corridors fall within San Joaquin kit fox range. Associated policy should include requirements to minimize habitat fragmentation. In addition to kit fox habitat connectivity, linkages are necessary to allow wildlife movement between river corridors and upland habitats, and between the Gabilan and Santa Lucia mountain ranges.

Where a project has the potential to inhibit wildlife movements, it should be designed to minimize the potential impacts to wildlife movement. To reduce crop damage and subsequent depredation permit requests to the Department, policy should require fencing to limit deer access to any new vineyards. General Plan policies should also require that any wire mesh fencing in San Joaquin kit fox range be constructed of mesh not smaller than six (6) by six (6) inches at ground level or other designs which are permeable to kit fox. General Plan policies for winery corridors should require breaks every 0.25 miles to allow passage of all wildlife where winery projects would fragment wildlife habitat. 4

Goal AG-5: Goal AG-5 promotes compatibility between agricultural uses and environmental resources, specifically soils and water quality. We support this goal and request that policies under AG-5 also promote compatibility between agricultural uses and biological resources. The DEIR identifies substantial impacts to biological resources resulting from anticipated agricultural expansion under the proposed General Plan. For example, the DEIR anticipates the loss of 7,709 acres of annual grasslands, due to development, and 7,536 acres due to agricultural conversion, with no means currently identified to compensate for San Joaquin kit fox habitat losses. 5

Goal OS-5: This proposed goal would "Conserve designated critical habitat for listed plant and animal species designated as federal or state threatened or endangered species and critical habitats designated in area plans." The Department recommends clarifying the term "critical habitat," revising this goal and subsequent policies to be consistent with the CEQA definition of "endangered, rare, or threatened species," and reevaluating the reference to area plan species lists since the area plans do not appear to contain species lists. 6

"Critical habitat" is a Federal designation applied to some Federally listed species. It applies only to Federal projects. The United States Fish and Wildlife Service (USFWS)

S-3

Carl Holm
February 3, 2009
Page 4

has not designated critical habitat for many Federally listed species. The State has no equivalent designation for State-listed species.

While the Department supports the goal of conserving critical habitat, we note that this goal and its supporting policies seem to misinterpret "critical habitat"—applying it to State-listed species, species designated by area plans, and Federally listed species which may have no critical habitat designation. Policies OS-1.7, 1.8, 5.1, 5.17, refer to different classes of resources with "critical habitat." This may lead to confusion when policies are applied to projects. Clarification of the term "critical habitat" and revising the goals and policies to reflect the CEQA definition of "endangered, rare, or threatened," may aid in more effective general plan implementation.

The CEQA Guidelines define "endangered, rare, or threatened" in Section 15380. Since the DGP is a "project," as defined by CEQA, and an intent of CEQA is to avoid, minimize, and (as a last resort) compensate for impacts to endangered, rare, or threatened species, Goal OS-5 should be consistent with the CEQA definition. The CEQA definition includes all species listed under the State and Federal Endangered Species Acts as well as those species which meet the criteria in Section 15380(b). For example, the California Native Plant Society maintains lists of rare species which meet the criteria for CEQA consideration, but are not on State or Federal endangered species lists. 6

The proposed OS-5 language referring to species listed in area plans is problematic because the area plans presented in the DGP do not designate species or critical habitats to be conserved. If the area plans will contain lists, they should be consistent with the CEQA definition of "endangered, rare, or threatened" as discussed above. Species which may not meet the criteria in Section 15380(b), but are of local importance, can be included in addition to those which meet the CEQA criteria. The area plans should also recognize that the status of species will change over time; any area plan lists should not be considered static.

Policy OS-5.4: This goal relies on the USFWS to prescribe mitigation measures for projects which affect critical habitat. This may be problematic because Federal critical habitat designations apply only to Federal projects. We are unaware of any mechanism that would require the USFWS to consult on non-Federal actions which may affect critical habitat. The Department recommends developing a general plan policy which parallels the Federal Endangered Species Act critical habitat regulations by requiring the County and its applicants to develop mitigation which avoids destroying or adversely modifying critical habitat. 7

S-3

Carl Holm
February 3, 2009
Page 5

Mitigation Measure BIO-1.3 and Policy OS-5.6: Mitigation measure BIO-1.3 in the DEIR and policy OS-5.6 in the DEIR require biological surveys only for projects which the County determines would affect special status species or sensitive natural communities. This may lead to a biological survey requirement only when special status species are already known to occur on a project site. The Department recommends that this measure and policy be revised to require that biological surveys should be required *to determine if* projects would affect biological resources.

One reasonable trigger may be to require biological surveys when a project would disturb or remove naturally occurring (including naturalized) vegetation. Such a policy would correspond with the botanical survey guidelines developed by the Department (http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/guideplt.pdf). Other circumstances may also warrant biological surveys even when naturally occurring vegetation would not be disturbed or removed, such as when building demolition could result in the loss of important bat roosts and the direct "take" of bats. Adopting a general plan policy to hire biological staff may aid in determining appropriate biological studies for each project. 8

Requiring surveys to determine if a project would affect biological resources, rather than requiring surveys when it is already known that a project may affect biological resources, would strengthen subsequent CEQA reviews in the following ways:

- assist in determining whether projects which would normally be categorically exempt may not be exempt because of location or a reasonable possibility of a significant effect (CEQA Guidelines §15300.2 (a) and (c)); circumstances which would go undetected in the absence of biological surveys
- assist in establishing baselines for CEQA reviews as required by CEQA Guidelines Section 15125
- assist in disclosing the impacts of a project
- assist in conserving biological resources which are currently undocumented

Policy OS-5.12: This policy requires Department consultation for impacts to "Areas of Special Biological Significance" (ASBS). While we support the underlying intent to protect these areas and would participate in discussions of impacts to them, please note that these areas are designated by the State Water Resources Control Board. The extents of ASBSs do not represent the range of species and natural communities which should be addressed in CEQA analyses. As a Trustee Agency for fish and wildlife resources, the Department is responsible for providing, as available, biological expertise to review and comment on environmental documents and impacts arising from all CEQA project activities. 9

S-3

Affordable Housing Overlay Area for the Monterey Airport and Vicinity: The Department requests that the area identified for affordable housing near the Monterey Airport be reconsidered. The area bounded by State Route 68, Olmstead Road, Via Malpaso, and the unnamed drainage to the east is an intact coastal terrace prairie dominated by native perennial grasses. The combination of this plant community with the mima-mound topography found on-site is exceptionally rare, often associated with rare endemic plant species, and typically comprises wetlands as defined by the California State Fish and Game Commission. This particular site is known to support several endemic, special status plant species, some of which indicate seasonal wetlands in coastal prairies:

Table 1. Special-Status Plant Species Known to Occur at the Affordable Overlay Area for the Monterey Airport and Vicinity

Species	Common Name	Status
Allium hickmanii	Hickman's onion	CNPS 1B.2
Cordylanthus rigidus ssp. *littoralis*	seaside bird's beak	SE, CNPS 1B.1
Piperia yadonii	Yadon's piperia	FE, CNPS 1B.1
Trifolium polyodon	Pacific Grove clover	SR, CNPS 1B.1
Trifolium buckwestiorum	Santa Cruz clover	CNPS 1B.1

SE: State Endangered; FE: Federal Endangered; SR: State Rare; CNPS 1B.1: California Native Plant Society seriously endangered in California; CNPS 1B.2 fairly endangered in California.

Development of this site may require an Incidental Take Permit, pursuant to Section 2080 of Department of Fish and Game Code. For State Rare species such as Pacific Grove clover, we currently do not have a mechanism to permit "take." The Department recommends that this site be managed for its significant natural resource values instead of being targeted for housing. 10

Lockwood Rural Center: The proposed Lockwood Rural Center boundaries include Critical Habitat for the Federal endangered vernal pool fairy shrimp (*Branchinecta lynchii*). The proposed rural center area south of Jolon Road, and a portion of the area north of Jolon Road and west of Lockwood-Jolon Road, overlaps entirely with Critical Habitat Unit 29A as designated by the USFWS. Designating this area as a rural center for development conflicts with the proposed general plan Goal OS-5, which would "conserve designated critical habitats..." In addition, much of the overlapping area appears to contain vernal pool and swale features. Please see our other comments above regarding Goal OS-5 and the use of the term "critical habitat." 11

S-3

Oak Tree Replacement: The North County and Carmel area plans require 1:1 oak tree replacement with 1-gallon plantings. The remaining area plans contain no oak tree replacement policies. All the planning areas contain oak woodlands. The Department recommends an oak woodland and oak tree policy for all planning areas. Policy should be developed to minimize or avoid the net loss of oak woodlands.

Tree planting mitigation ratios are typically greater than 1:1 to compensate for tree plantings which fail to reach maturity. Allowing a 1:1 ratio will likely lead to a net loss in trees, potentially resulting in unmitigated impacts. 12

In addition, tree plantings alone may not mitigate the loss of an oak woodland. Therefore, we recommend developing policy which requires replacing areas of oak woodlands when a project displaces oak woodlands. Public Resources Code (PRC) Section 21083.4 outlines the tools available to offset significant oak woodland impacts. The Department encourages general plan policy which reflects the provisions of PRC Section 21083.4. The provisions include oak woodland conservation easements, replacement tree plantings with a seven-year maintenance period, restoration of degraded oak woodlands, and contributions to the Oak Woodlands Conservation Fund. The Department is willing to provide a letter of support should the County submit a grant proposal to obtain funds to develop an oak conservation element for the general plan, oak protection ordinance, or an oak woodland management plan, pursuant to the Oak Woodlands Conservation Act.

Mitigation Measure BIO-1.2: The Department supports this measure and encourages its implementation, which would require the County to develop a conservation plan to sustain the Salinas Valley San Joaquin kit fox population. A Natural Communities Conservation Plan may be an appropriate tool for the Salinas Valley and adjoining foothills. 13

Thank you for the opportunity to comment on the 2007 General Plan and DEIR. If you have any questions regarding these comments, please contact Dave Hacker, Environmental Scientist, at 3196 Higuera Street, Suite A, San Luis Obispo, California 93401, by telephone at (805) 594-6152, or email at dhacker@dfg.ca.gov.

Sincerely,

Andrew G. Gordus, PhD

for Jeffrey R. Single, PhD.
Regional Manager

cc: See Page Eight

02-03-09 16:48 FROM-DFG 559 2433004 T-282 P.008/009 F-906

S-3

Carl Holm
February 3, 2009
Page 8

cc: United States Fish and
Wildlife Service
2493 Portola Road, Suite B
Ventura, California 93003

ec: Terry Palmisano
Deb Hillyard
Linda Connolly
Jeff Cann
Department of Fish and Game

02-03-09 16:45 FROM-DFG 559 2433004 T-282 P.001/009 F-906

S-3

FACSIMILIE LEADER PAGE

California Department of Fish and Game
Central Region
Region 4
1234 East Shaw Avenue
Fresno, California 93710
INFO (559) 243-4017 **FAX (559) 243-3004**

DATE: 2/3/09 **PAGE 1 OF** 9

TO: Carl Holm
Monterey Co Resource Management Agency

FAX: (831) 757-9516 **PHONE:** (831) 755-5025

FROM: Dave Hacker

INSTRUCTIONS: Original to follow by mail.

S-4

STATE OF CALIFORNIA—THE NATURAL RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF FORESTRY AND FIRE PROTECTION
San Benito-Monterey Unit
2221 Garden Road
Monterey, California 93940
(831) 333-2680 FAX (831) 333-2660
Website: www.fire.ca.gov

January 13, 2009

Carl Holm, Assistant Director
RMA-Planning Department
168 West Alisal Street
Salinas, California 93901

Dear Mr. Holm:

This letter is in response to your request for comments'on the Comprehensive Update of the 1982 Monterey County General Plan. The California Department of Forestry and Fire Protection (CAL FIRE) administrative unit charged with wildland fire protection in Monterey County is known as the San Benito—Monterey Unit. CAL FIRE provides wildland fire protection to 1.3 million acres of State Responsibility Area (SRA) from seven fire stations and one conservation camp located in Monterey County. In addition to the CAL FIRE equipment located within Monterey County, there are two air tankers, an aerial command aircraft and a helicopter located in adjacent San Benito County. The state funded fire equipment located in Monterey County is sufficient to meet the stated CAL FIRE goal of controlling 95% of SRA wild fires in the first burning period. 1

Structural fire protection in the county (Local Responsibility Area or LRA) is the responsibility of local government and is provided by various fire protection districts and special districts, of which five have contracts with CAL FIRE to manage and staff their departments. Pebble Beach Community Services District, Cypress Fire Protection District, Carmel Highlands Fire Protection District, Aromas Tri-County Fire Protection District, and South Monterey County Fire Protection District all contract with CAL FIRE.

As I am sure you are aware, the State Board of Forestry and Fire Protection (BOF/Board) is required by the Government Code (GC) Section 65302.5 to review and make recommendations on the fire safety element of general plan updates. The review and recommendations apply to general plans with SRA (Public Resources Code 4125) or Very High Hazard Severity Zones (VHFHSZ) (GC 51175).

CONSERVATION IS WISE-KEEP CALIFORNIA GREEN AND GOLDEN

PLEASE REMEMBER TO CONSERVE ENERGY. FOR TIPS AND INFORMATION, VISIT "PLEX YOUR POWER" AT www.CA.gov

S-4

In order to assist you and your staff, I have attached a copy of the State Board of Forestry and Fire Protection General Plan Fire Safety Element Standard Recommendations. I am confident that you will find them useful in your revision process. 1

If I can be of further assistance, please do not hesitate to call.

Sincerely,

GEORGE W. HAINES
Unit Chief

By
Robert E. Taylor
Assistant Chief

Attachment
cc: Brian Barrette
Chris Zimny

S-4

General Plan Fire Safety Element

Standard Recommendations

August 29, 2007

State Board of Forestry and Fire Protection

Contents

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
State Agencies

S-4

Purpose and Background: The State Board of Forestry and Fire Protection (BOF/Board) is required to review and make recommendations to the fire safety element of general plan updates in accordance with Government Code (GC) §65302.5. The review and recommendations apply to those general plans with State Responsibility Area (SRA) (Public Resources Code 4125) or Very High Fire *Hazard Severity Zones* (VHFHSZ) *(GC 51175).*

The statutory requirements for the Board review and recommendations pursuant to GC 65302.5 (a)(1) and (2), and (b) are as follows:

- "The draft elements... to the fire safety element of a county's or a city's general plan...shall be submitted to the Board at least 90 days prior to... the adoption or amendment to the safety element of its general plan [for each county or city with SRA or VHFHSZ]."
- "The Board shall... review the draft or an existing safety element and report *its written* recommendations to the *planning* agency *within 60 days of its receipt of the draft or existing safety* element...."
- *Prior to adoption of* the draft element..., the Board of Supervisors... shall consider the recommendations made by the Board... If the Board of Supervisors...determines not to accept all or some of the recommendations...," the Board of Supervisors... shall communicate in writing to the Board its reasons for not accepting the recommendations.

Methodology for Review and Recommendations: The Board has created a standard list of fire protection evaluation factors and recommendations related to these factors. The factors and recommendations provide civic planners general plan goals and policies for mitigation of fire hazard and risks. The factors and recommendations were developed using CAL FIRE technical documents and input from local fire departments.

The recommendations on the attached list are the Board's general recommendations for any entity.. Each entity should evaluate their general plan using the factors and include the appropriate recommendations from the list.

Standard List of General Plan Safety Element Recommendations

I. **General Plan References and Incorporates County or Unit Fire Plan:** O Yes O Partial O No

Recommendation: Identify, reference or create (if necessary) a fire plan for the entity. Plan should incorporate the general concepts and standards from any county fire plan, fire protection agency (federal or state) fire plan, and local hazard mitigation plan.

Recommendation: Ensure fire plans incorporated by reference into the GP contain evaluations of fire hazards, assessment of assets at risk, prioritization of hazard mitigation actions, and implementation and monitoring components.

2. Land Use Mannino:

2.1 Goals and policies include mitigation of fire hazard for future development. ❑ Yes O Partial O No

Recommendation: Ensure the fire safe development codes used as standards for fire protection for new development in the VHFHSZ portions of the entity's jurisdiction meet or exceed statewide standards used for State Responsibility Area in 14 California Code of Regulations Section 1270 et seq.

Recommendation: Include policies and recommendations that incorporate fire safe buffers and greenbelts as part of the development planning. Ensure that land uses designated near high or very fire hazard severity zones are compatible with wildland fire protection strategies/capabilities.

2.2 Disclosure of wildland urban interface hazards including Very High Fire Hazard Severity Zones designations and Communities at Risk designations: O Yes O Partial ◧ No

Recommendation: Specify whether the entity has a VHFHSZ designation and include a map of the zones. Clearly indicate any area designated VHFHSZ pursuant GC 51175. Adopt CAL FIRE proposed Fire Hazard Severity Zones including model ordinance terms and conditions developed by the Office of the State Fire Marshal for establishing VHFHSZ areas.

3. Kousiino:

3.1 Incorporation of current fire safe building codes. D Yes O Partial O No

Recommendation: Adopt the International Fire Code Council Urban Interface Model Code for new development in wildland urban interface areas in State Responsibility Areas or local Very

High Fire Hazard Severity Zones. Adopt newly proposed Title 24 CCR'Midland Urban Interface Building Codes.

3.2 Identification of substandard fire safe housing relative to fire hazard area. ❑ Yes ❑ Partial ❑ No

Recommendation: Identify plans and actions to improve substandard housing structure conformance with contemporary fire standards in VHFHSZ or SRA. Plans and actions should include structural rehabilitation, occupancy reduction, demolition, reconstruction, community education, and community based solutions.

3.3 Compatibility of development, construction and building standards relative to access, flammability and fire flow. ❑ Yes ❑ Partial ❑ No

Recommendation: Ensure existing residential structures, and other "legacy" substandard residential structures, meet current fire safe ordinances pertaining to access, water flow, signing, and vegetation clearing.

3.4 Consideration of occupancy category effects on wildfire protection. ❑ Yes D Partial No

Recommendation: Ensure risks to uniquely occupied structures, such as seasonally occupied homes, multiple dwelling structures, or other structures with unique occupancy characteristics, are considered for appropriate and unique wildfire protection needs.

3.5 Urban development and wildfire encroachment resistance features. ❑ Yes ❑ Partial ❑ No

Recommendation: Ensure residential housing zoning provides minimum fire safe standards, particularly in VHSHSZ or SRA. For example, zone designations that allow less expensive housing should conform to contemporary fire safe building and development standards.

3.6 Fire engineering structures (sprinklers/alarms). ❑ Yes ❑ Partial ❑ No

Recommendation: Ensure new development proposals contain specific fire protection plans, actions or referenced codes for fire engineering features for structures in VHFHSZ. Examples include codes requiring automatic sprinklers in VHFHSZ.

4. Conservation and Open Space:

4.1 Identification of critical natural resource values relative to fire hazard areas.
D Yes ❑ Partial ❑ No

Recommendation: Determine maximum acceptable wildfire size and initial attack suppression success rates for protection of critical natural resources.

S-4

4.2 Inclusion of resource management activities to enhance protection of open space (prescribed burning, fuel breaks, vegetation thinning and removal). O Yes O Partial O No

Recommendation: Provide vegetation management fire mitigation measures that provide protection of open space natural resources, reduce fire hazards to adjacent assets, and allow for safe fire suppression tactics.

4.3 Mitigation for unique pest, disease and other forest health issues leading to hazardous situations. O Yes O Partial O No

Recommendation: Establish goals and policies that address unique pest, disease, exotic species and other forest health issues in open space areas relative to reducing fire hazard.

4.4 Integration of open space into fire safety effectiveness. O Yes ⬭ Partial No

Recommendation: Establish goals and policies for reducing the wildland fire hazards within the entity's boundaries and on adjacent private wildlands, federal lands, vacant residential lots, and greenbelts. Wildland fuels should be treated in those areas to reduce the intensity of fires. Identify goals and policies for engaging adjacent wildland owners regarding hazard mitigation plans on lands with fire hazards that threaten the entity.

4.5 Policies for dedication, construction and maintenance of systematic fire protection improvements in open space. O Yes ☐ Partial ☐ No

Recommendation: Establish goals and policies for incorporating, systematic fire protection improvements for open space. Specifics should include standards for adequate access for firefighting, fuel modifications for open space within and on the perimeter of the entity, mitigation planning with agencies managing open space, water sources for fire suppression, and other fire prevention and suppression needs.

4.6 Urban forestry plans relative to fire protection: O Yes O Partial O No

Recommendation: Ensure residential areas have appropriate fire resistant landscapes and discontinuous vegetation adjacent to open space or wildland areas.

Recommendation: Evaluate and resolve existing laws and local ordinances which conflict with fire protection requirements. Examples include conflicts with vegetation hazard reduction ordinances and listed species habitat protection requirements.

5. Circulation and Access:

5.1 Existing and planned transportation system incorporates requirements for designs that minimize wildfire damage to natural resources and minimizes hazards to human life.
D Yes O Partial O No

S-4

Recommendation: Incorporate adequate access for firefighting, especially for existing legacy" neighborhoods in VHFHSZ, SRA. Goals for standards for access should be consistent to those in 14 CCR 1270.

5.2 Adequacy of existing and future transportation system to incorporate fire infrastructure elements such as turnouts, helispots and safety zones. D Yes ☐ Partial ☐ No

Recommendation: Establish goals and policies for transportation system fire infrastructure elements or otherwise reference appropriate supporting documents where these topics are addressed.

5.3 Adequate access to high hazard areas. ☐ Yes ☐ Partial ☐ No

Recommendation: Establish goals and policies that delineate high hazard areas, establish adequate access that meets or exceeds standards in 14 CCR 1270 for lands with no structures, and maintaining conditions of access in a suitable fashion for suppression access or public evacuation.

5.4 Standards for evacuation of residential areas in high hazard areas. D Yes ⬭ Partial ☐ No

Recommendation: Goals and policies should be established to delineate residential evacuation routes and evacuation plans in high fire hazard residential areas.

6. Hazard Mapping and Fire Safe Regulations:

6.1 Fire Hazard Mapping Designations O Yes D Partial D No

Recommendation: Specify whether the entity has an official VHFHSZ designation and include a map of the zones. Clearly indicate any VHFHSZ pursuant GC 51175. Adopt CAL FIRE proposed Fire Hazard Severity Zones.

Adopt or incorporate local fire safe ordinances which meet or exceed standards similar to those in 14 CCR § 1270 for State Responsibility Area. ☐ Yes ☐ partial ◉ No

Recommendation: Establish goals and policies for specific ordinances addressing evacuation and emergency vehicle access; water supplies and fire flow; fuel modification for defensible space; and home addressing and signing.

6.3 Geographic specific mitigation measures for fuel modification and fire risk reduction.
O Yes ☐ Partial ☐ No

Recommendation: Establish goals and policies that identify structures that have adequate fuel modification or other features that provide adequate fire fighter safety when tactics call for protection of a specific asset (i.e. which houses are safe to protect).

S-4

6.4 *Fuel Modification around homes.* O Yes ❑ Partial D No

Recommendation: Establish ordinances in VHFHSZ for vegetation fire hazard reduction around structures that meet or exceed the Board of Forestry and Fire Protection's Defensible Space Guidelines, (http://www.[illegible] 29.06.pdf) for SRA.

6.5 Adequacy of defense zones ❑ Yes ❑ Partial ❑ No

Recommendation: Establish goals and policies for wildfire defense zones for emergency services including fuel breaks, back fire areas, or other staging areas that support safe fire suppression activities.

7. Emergency Services:

7.1 Map/description of existing emergency service facilities and areas lacking services:
❑ Yes ❑ Partial ❑ No

Recommendation: Include descriptions, maps, and standards for levels of emergency services. Review, develop or incorporate Local Agency Formation municipal services reviews *for evaluating* level *of service, response times, equipments condition levels and other relevant* emergency service information.

Recommendation: *Incorporate goals and policies that* establish *emergency services* consistent with state or national standards.

Recommendation: Ensure new development includes appropriate facilities to assist and support wildfire suppression.

7.2 *Assessment and projection future emergency service needs:* QD Yes Partial No

Recommendation: Establish goals and policies for new development emergency service needs and ensure appropriate levels of service are established consistent with state or national standards.

7.3 Adequacy of training. O Yes ❑ Partial D No

Recommendation: Establish goals and policies for emergency service training that meets or exceeds state or national standards.

7.4 Inter-fire service coordination preparedness/mutual aid and multi jurisdictional fire service *agreements.* ❑ Yes O Partial ❑ No

Recommendation: Adopt the Standardized Emergency Management Systems for responding to large scale disasters requiring a multi-agency response. Ensure and review mutual aid and cooperative agreements with adjoining emergency service providers.

Page 7 of 9
BOF Fire Safety Element GP Review and Standard Recommendations
August 29, 2007

S-4

8. Post Recovery and Maintenance: The Recovery and Maintenance recommendations address an opportunity for the community and landowners to re-evaluate land uses and practices that affect future wildfire hazards and risk.

8.1 Revaluate hazard conditions. D Yes ❑ Partial ❑ No

Recommendation: Incorporate goals and policies that provide for reassessment of fire hazards following wildfire events. Adjust fire prevention and suppression needs commensurate for both short and long term fire protection needs. Develop bum area recovery plans that incorporate comprehensive recovery and fire safe maintenance.

8.2 Incorporate wildlife habitat//endangered species considerations. ❑ Yes ❑ Partial ❑ No

Recommendation: Establish goals and policies for consideration of wildlife habitat//endangered species into long term fire area recovery and protection plans.

8.3 Native species reintroduction. O Yes ❑ Partial ❑ No

Recommendation: Incorporate native species habitat needs as part of long term fire protection and fire restoration plans.

8.4 Evaluation of redevelopment. ❑ Yes ❑ Partial ❑ No

Recommendation: In High and Very hazardous areas, ensure redevelopment utilizes state of the art fire resistant building standards with 100 foot set backs (when possible) to ensure adequate defensible space is maintained around structures.

8.5 Long term maintenance of fire hazard reduction mitigation projects ❑ Yes ❑ Partial ❑ No

Recommendation: Provide polices and goals for maintenance of fire hazard reduction projects, activities, or infrastructure.

9. Flood and Landslides: Recommendations for flood and landslides hazards, risks and vulnerabilities relative to past wildfire should be developed to mitigate potential losses to life, human assets and critical natural resources.

9.1 Establish flood and landslide vulnerability areas related to post wildfire conditions.
D Yes ❑ Partial D No

Recommendation: Establish goals and policies that address the intersection of flood /landslide/post fire bum areas into long term public safety protection plans. These should include treatment assessment of fire related flood risk to life, methods to control storm runoff in bum areas, revegetation of bum areas, and drainage crossing debris maintenance.

Page 8 of 9
BOF Fire Safety Element GP Review and Standard Recommendations
August 29, 2007

S-4

10. Terrorist Preparedness and homeland security impacts on wildfire protection:
These recommendations are included to ensure that terrorist preparedness actions do not substantially increase fire risk or unduly restrict emergency response.

10.1 Communication channels during incidences. D Yes Q Partial O No

Recommendation: Establish goals and policies consistent with the Governor's Blue Ribbon Fire Commission of 2005 for communications and interoperability. Example goals and policies should address fire personnel capability to communicate effectively across multiple frequency bands and update and expansion of current handheld and mobile radios used on major mutual aid incidents.

10.2 Fire prevention barriers. E Yes ☐ Partial D No

Recommendation: Identify goals and policies that address vital access routes that if removed would prevent fire fighter access (bridges, dams, etc.). Develop an alternative emergency access plan for these areas.

10.3 Prioritizing asset protection from fire with lack of suppression forces. ☐ Yes ☐ Partial ☐ No

Recommendation: Identify and prioritize protection needs for assets at risk in the absence of response forces.

Recommendation: Establish fire defense zones that provide adequate fire protection without dependency on air attack.

End Standard Recommendations (version 8/29/07)

S-5

Department of Toxic Substances Control

Linda S. Adams
Secretary for
Environmental Protection

Maureen F. Gorsen, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Arnold Schwarzenegger
Governor

October 31, 2008

Mr. Carl Holm
Planning Manager
Monterey County Planning Department
168 W. Alisal Street, 2nd Floor
Salinas, California 93901

REVIEW OF THE MONTEREY COUNTY 2007 GENERAL PLAN (AMENDED) DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR), SCH #2007121001 DATED SEPTEMBER 2008

Dear Mr. Holm:

Thank you for providing the Department of Toxic Substances Control (DTSC) the opportunity to review the *Monterey County 2007 General Plan Draft Environmental Impact Report* dated September, 2008.

DTSC is the State's lead agency for the environmental cleanup and realignment of closing military bases and maintains jurisdiction over all hazardous substance and hazardous waste issues with the exception of petroleum contamination. The basis for DTSC's regulatory authority is found in California Health and Safety Code, Division 20, Chapters 6.5 (Hazardous Waste Control), Chapter 6.8 (Hazardous Substances Account Act), and California Code of Regulations, Title 22, Division 4.5. 1

The Central Coast Regional Water Quality Control Broad (CCRWQCB) has authority over the remediation of petroleum sites and the protection of the waters of the State of California. The CCRWQCB regulatory authority is found in the Porter-Cologne Water Quality Control Act, California Water Code and California Code of Regulations, Title 23, Division 3, Chapter 15 and 16. In addition, the Air Resources Board would be concerned with impacts to air quality.

DTSC generally reviews the environmental documents to determine whether the proposed project could have potential impact on public health and worker safety because of the possible presence of residual chemical contaminants and/or munitions and explosives of concern (MEC).

Printed on Recycled Paper

S-5

Mr. Carl Holm
October 31, 2008
Page 2

Please ensure that any reuse planned for property on the former Fort Ord facility is consistent with the approved Fort Ord Reuse Plan dated June 1997. This is the document that the regulators use to ensure cleanup levels support reuse of various parcels. 2

The comments below were previously submitted to your agency for the 2006 General Plan DEIR. These are being resubmitted to ensure completeness of our review.

Table 1-2 Executive Summary Table, Mitigation Measure 4.3 Water Resources. Volatile Organic Compounds and other contaminants have been found to impact the groundwater resources at numerous sites in Monterey County, and the most notable is the former Fort Ord. Although the Fort Ord and Monterey Peninsula Airport prohibition zones and the associated County Ordinance are mentioned briefly in Section 4.3 (Page 4.3-72) of the DEIR, DTSC encourages the County to research the extent of groundwater impacts that have been identified in Monterey County. For instance, the former Fort Ord drinking water wells have been impacted with low concentrations of Trichloroethene (TCE). These other organic contaminants should be added to mitigation measure Table 1-2 and other appropriate tables throughout the document. Information with respect to the status of the former Fort Ord cleanup program can be found at www.fortordcleanup.com. You can also view various Land Use Covenants for groundwater use restrictions for Fort Ord on the DTSC's web page, www.envirostor.dtsc.ca.gov 3

Section 4.3.4, Page 4.3-100 Well Competition and Adverse Well Interference. This section describes the impacts of wells in close proximity or adjacent to each other that can be thought of as competing for the same groundwater resources. It should be noted that interference with groundwater contaminant plumes should also be avoided. If upon pumping, the cone of depression interferes with a contaminated groundwater plume, adverse effects will result. 4

Section 4.13, Hazards and Hazardous Materials. The presence of MEC has been identified in the former Fort Ord area. The MEC areas are being identified, evaluated and remediated by the Army, although DTSC feels that MEC should be listed as a hazardous material on page 4.13-2. In addition, the Army feels that reasonable and prudent actions be taken when performing intrusive activities on the former Fort Ord site. The Army recommends that construction personnel involved in intrusive activity attend MEC recognition and safety training as offered by the Army in accordance with Record of Decision, No Further Action Related to Munitions and Explosives of Concern 5

S-5

Mr. Carl Holm
October 31, 2008
Page 3

Track 1 Sites, February 2005. The Army requires to be notified, by the landowner, prior to the start of planned intrusive activities. The link for registering for this training can be found at www.fortordcleanup.com. 5

If you have any questions, please feel free to contact me at (916) 255-3664.

Sincerely,

Theresa McGarry
Hazardous Substances Scientist
Sacramento Office
Brownfields and Environmental Restoration Program

cc: Ms. Gail Youngblood
Fort Ord BRAC Environmental Coordinator
Department of the Army
Environmental and Natural Resources
Post Office Box 5004
Presidio of Monterey, California 93944-5004

Mr. Grant Himebaugh
Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

Office of Planning and Research
State Clearinghouse
1400 Tenth Street
Post Office Box 3044
Sacramento, California 95812-3044

Mr. Guenther Moskat
California CEQA Tracking Center
1001 I Street, 25th Floor
Post Office Box 806
Sacramento, California 95812-0806

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
FAX (805) 549-3077
TDD (805) 549-3259
http://www.dot.ca.gov/dist05/

S-6

Flex your power!
Be energy efficient!

October 28, 2008

SCH#: 2007121001

Carl Holm
County of Monterey, Resource Management Agency
168 West Alisal Street, 2nd Floor
Salinas, CA 93901-2680

RE: 2007 MONTEREY COUNTY GENERAL PLAN

Dear Mr. Holm:

The California Department of Transportation (Caltrans), District 5, has reviewed the 2007 General Plan Draft Environmental Impact Report and offers the following comments.

GENERAL COMMENTS

1. Caltrans supports the county's adoption of the Regional Development Impact Fee Program that originated from the Transportation Agency for Monterey County's 2005 Nexus Study, and its use for the mitigation of cumulative regional traffic impacts in Monterey County. The program is consistent with both California Environmental Quality Act (CEQA) guidelines and Caltrans objectives, assuming that project-specific impacts will continue to be addressed on a case-by-case basis to determine appropriate mitigation. Impacts to mainline transportation facilities must be considered in addition to access points. 1

2. Caltrans supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel and development. 2

3. Because Caltrans is responsible for the safety, operations, and maintenance of the State transportation system, our Level of Service (LOS) standards are used to determine the significance of the project's impact. We endeavor to maintain a target LOS *at the transition between LOS C and LOS D* on all State transportation facilities. In cases where a State facility is already operating at an unacceptable LOS, the Department would consider additional trips to be a potentially significant cumulative traffic impact, and they should be addressed. The methodologies used to calculate the LOS should be consistent with the methods in the current version of the *Highway Capacity Manual*. Also, some of the general assumptions that may have been used to calculate LOS for this report may be suitable for 3

"Caltrans improves mobility across California"

planning purposes, but should not be used for design and operations decisions (assumptions may include an average shoulder width, average frequency of driveways or turn lanes, etc.). 3

4. The Transportation Agency for Monterey County conducts traffic counts in April and August each year, and may be coordinating their counts with the Santa Cruz County Regional Transportation Commission, the Council of San Benito County Governments, and the Association of Monterey Bay Area Governments (AMBAG). This type of data is valuable for AMBAG's regional travel demand model. If it has not already been done, AMBAG should be contacted to discuss coordinated count efforts with the County of Monterey. 4

5. The network of Amtrak thruway buses that pass through Monterey County and connect to the intercity rail lines should be mentioned, along with their impact on regional traffic. 5

6. We support the conclusions in the Transit Oriented Development (TOD) alternative, noting that funding for the second and third tier (Bus Rapid Transit and Light Rail) will be difficult to obtain. Furthermore, it should be noted that lower frequency and lower quality service is unlikely to yield successful TOD. The assumptions about transit system characteristics must be reviewed thoroughly before any conclusions can be drawn about regional impacts on either traffic or land development. 6

SPECIFIC COMMENTS

1. The definition of archaeology should not be limited to prehistoric resources, and archaeological resources can be older than 10,000 years (4.10.2). 7

2. Please include a discussion of the Salinan Indians, whose main territory is Monterey County (4.10.2.2). 8

3. The citation of "California Register of Historic Places" should actually be "California Register of Historical Resources" (4.10.3.1). 9

4. The second sentence of the Open Space and Conservation Element has one unclear clause: "on such matters archaeological resources." Also, the term "Native American descendants" should be replaced with "Native Americans" (4.10-17). 10

5. Please include the proposed bicycle bridge over the Salinas River (Spreckels Boulevard/Reservation Road Bicycle Path and Bridge). 11

6. On page 4.6-39, there is a statement suggesting that an increase in county truck volume from 12,600 to 18,600 per day would be insignificant in terms of capacity-related impacts. The potential significant impacts of such a change should be considered, noting that there are very few north-south and east-west shipping corridors in the region, and that impacts may be regional in nature. 12

"Caltrans improves mobility across California"

S-6

2007 Monterey County General Plan
October 28, 2008
Page 3

7. In reference to the above comment, we suggest a policy that encourages placement of agricultural processing, industrial and manufacturing oriented land uses adjacent to existing or probable railroad spurs, yards, and sidings. There is no discussion of the possibility of an intermodal transfer facility for freight containers on trains. Planning strategies today that align shipping modes in future years will provide opportunities to growers and shippers when the economics of increased rail use (as a business framework) and the economics of climate change and air quality requirements (in a regulatory framework) set the conditions to compel rail use. The environmental benefits of transferring freight from truck to rail can be substantial, with one full freight train eliminating 280 trucks or 1100 cars from regional roadways. The American Association of State Highway and Transportation Officials (AASHTO) *Freight-Rail Bottom Line Report*, which provides the source figure of 4 to 5 trucks per rail car, may be found at http://freight.transportation.org or http://www.go21.org. 13

District 5 staff will continue to be committed to working closely with you to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel.

If you have any questions, or need further clarification on items discussed above, please do not hesitate to contact David Kuperman at (805) 549-3131 or david_kuperman@dot.ca.gov.

Sincerely,

DAVID MURRAY, Chief
District 5 North Region

cc: Nick Papadakis (AMBAG)
Debbie Hale (TAMC)

"Caltrans improves mobility across California"

S-6

2007 Monterey County General Plan
October 28, 2008
Page 4

Bcc: Steve Price
Aileen Loe
Tim Gubbins
Gary Ruggerone
Doug Heumann
Dave Murray
Chris Shaeffer
Dan Herron
Paul McClintic
Judy Lang

"Caltrans improves mobility across California"

S-7

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

October 29, 2008

Monterey County
Planning and Building
Inspection Administration

OCT 31 2008

RECEIVED

Carl Holm
Monterey County
168 W. Alisal Street, 2nd Floor
Salinas, CA 93901-2680

Subject: 2007 Monterey County General Plan
SCH#: 2007121001

Dear Carl Holm:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 28, 2008, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

S-7

Document Details Report
State Clearinghouse Data Base

SCH#	2007121001
Project Title	2007 Monterey County General Plan
Lead Agency	Monterey County
Type	EIR Draft EIR
Description	Note: Supplement/Subsequent, Program EIR The General Plan serves as the blueprint for growth in unincorporated inland areas of Monterey County by designating land for various urban and non-urban uses including agricultural, commercial, industrial, residential, and public/quasi-public. GP 2007 carries over most of the policies and land use designations that composed GP 2000, with a number of key revisions. The following describes GP 2007, with items that represent a change from GP 2006 marked with an asterisk or listed under "Other GP 2007 Provisions.

Lead Agency Contact

Name	Carl Holm
Agency	Monterey County
Phone	(916) 755-5103 ***Fax***
email	
Address	168 W. Alisal Street, 2nd Floor
City	Salinas ***State*** CA ***Zip*** 93901-2680

Project Location

County	Monterey
City	Carmel-by-the-Sea
Region	
Lat / Long	
Cross Streets	
Parcel No.	
Township	***Range*** ***Section*** ***Base***

Proximity to:

Highways	multiple
Airports	multiple
Railways	multiple
Waterways	multiple
Schools	multiple
Land Use	This is an update to the 1982 General Plan effective county-wide. Various zoning and land use designations

Project Issues	Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife
Reviewing Agencies	Resources Agency; Department of Conservation; Department of Fish and Game, Region 4; Cal Fire; Department of Parks and Recreation; Office of Emergency Services; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 5; Department of Housing and Community Development; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 3; Native American Heritage Commission; Public Utilities Commission
Date Received	09/05/2008 ***Start of Review*** 09/05/2008 ***End of Review*** 10/28/2008

Note: Blanks in data fields result from insufficient information provided by lead agency.

S-7

STATE OF CALIFORNIA — Arnold Schwarzenegger, *Governor*

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax

Clear 10-28-08 e

RECEIVED
SEP 17 2008
STATE CLEARING HOUSE

September 12, 2008

Carl Holm
County of Monterey, Resource Management Agency
168 West Alisal Street, 2nd Floor
Salinas, CA 93901-2680

RE: SCH#2007121001 2007 Monterey County General Plan; Monterey County.

Dear Mr.Holm:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Completion (NOC) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. **USGS 7.5 minute quadrangle name, township, range and section required.**
  - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached.**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

1

Sincerely,
Katy Sanchez
Katy Sanchez
Program Analyst

CC: State Clearinghouse

S-8a

21

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

November 5, 2008

Monterey County
Planning and Building
Inspection Administration
NOV 07 2008
RECEIVED
Comments recd on 11/6/08

Carl Holm
Monterey County
168 W. Alisal Street, 2nd Floor
Salinas, CA 93901-2680

Subject: 2007 Monterey County General Plan
SCH#: 2007121001

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 28, 2008. 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 (2007121001) when contacting this office.

Sincerely,
Terry Roberts

See S-5

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

S-8a

See S-5

Department of Toxic Substances Control

Maureen F. Gorsen, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Linda S. Adams
Secretary for
Environmental Protection

Arnold Schwarzenegger
Governor

October 31, 2008

RECEIVED
NOV 0 5 2008
STATE CLEARING HOUSE

Clear 10-28-08 Late C

Mr. Carl Holm
Planning Manager
Monterey County Planning Department
168 W. Alisal Street, 2nd Floor
Salinas, California 93901

REVIEW OF THE MONTEREY COUNTY 2007 GENERAL PLAN (AMENDED) DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR), SCH #2007121001 DATED SEPTEMBER 2008

Dear Mr. Holm:

Thank you for providing the Department of Toxic Substances Control (DTSC) the opportunity to review the *Monterey County 2007 General Plan Draft Environmental Impact Report* dated September, 2008.

DTSC is the State's lead agency for the environmental cleanup and realignment of closing military bases and maintains jurisdiction over all hazardous substance and hazardous waste issues with the exception of petroleum contamination. The basis for DTSC's regulatory authority is found in California Health and Safety Code, Division 20, Chapters 6.5 (Hazardous Waste Control), Chapter 6.8 (Hazardous Substances Account Act), and California Code of Regulations, Title 22, Division 4.5.

The Central Coast Regional Water Quality Control Broad (CCRWQCB) has authority over the remediation of petroleum sites and the protection of the waters of the State of California. The CCRWQCB regulatory authority is found in the Porter-Cologne Water Quality Control Act, California Water Code and California Code of Regulations, Title 23, Division 3, Chapter 15 and 16. In addition, the Air Resources Board would be concerned with impacts to air quality.

DTSC generally reviews the environmental documents to determine whether the proposed project could have potential impact on public health and worker safety because of the possible presence of residual chemical contaminants and/or munitions and explosives of concern (MEC).

Printed on Recycled Paper

S-8a

See S-5

Please ensure that any reuse planned for property on the former Fort Ord facility is consistent with the approved Fort Ord Reuse Plan dated June 1997. This is the document that the regulators use to ensure cleanup levels support reuse of various parcels.

The comments below were previously submitted to your agency for the 2006 General Plan DEIR. These are being resubmitted to ensure completeness of our review.

Table 1-2 Executive Summary Table, Mitigation Measure 4.3 Water Resources. Volatile Organic Compounds and other contaminants have been found to impact the groundwater resources at numerous sites in Monterey County, and the most notable is the former Fort Ord. Although the Fort Ord and Monterey Peninsula Airport prohibition zones and the associated County Ordinance are mentioned briefly in Section 4.3 (Page 4.3-72) of the DEIR, DTSC encourages the County to research the extent of groundwater impacts that have been identified in Monterey County. For instance, the former Fort Ord drinking water wells have been impacted with low concentrations of Trichloroethene (TCE). These other organic contaminants should be added to mitigation measure Table 1-2 and other appropriate tables throughout the document. Information with respect to the status of the former Fort Ord cleanup program can be found at www.fortordcleanup.com. You can also view various Land Use Covenants for groundwater use restrictions for Fort Ord on the DTSC's web page, www.envirostor.dtsc.ca.gov

Section 4.3.4, Page 4.3-100 Well Competition and Adverse Well Interference. This section describes the impacts of wells in close proximity or adjacent to each other that can be thought of as competing for the same groundwater resources. It should be noted that interference with groundwater contaminant plumes should also be avoided. If upon pumping, the cone of depression interferes with a contaminated groundwater plume, adverse effects will result.

Section 4.13, Hazards and Hazardous Materials. The presence of MEC has been identified in the former Fort Ord area. The MEC areas are being identified, evaluated and remediated by the Army, although DTSC feels that MEC should be listed as a hazardous material on page 4.13-2. In addition, the Army feels that reasonable and prudent actions be taken when performing intrusive activities on the former Fort Ord site. The Army recommends that construction personnel involved in intrusive activity attend MEC recognition and safety training as offered by the Army in accordance with Record of Decision, No Further Action Related to Munitions and Explosives of Concern

S-8a

See S-5

Mr. Carl Holm
October 31, 2008
Page 3

Track 1 Sites, February 2005. The Army requires to be notified, by the landowner, prior to the start of planned intrusive activities. The link for registering for this training can be found at www.fortordcleanup.com.

If you have any questions, please feel free to contact me at (916) 255-3664.

Sincerely,

Theresa McGarry
Hazardous Substances Scientist
Sacramento Office
Brownfields and Environmental Restoration Program

cc: Ms. Gail Youngblood
Fort Ord BRAC Environmental Coordinator
Department of the Army
Environmental and Natural Resources
Post Office Box 5004
Presidio of Monterey, California 93944-5004

Mr. Grant Himebaugh
Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

Office of Planning and Research
State Clearinghouse
1400 Tenth Street
Post Office Box 3044
Sacramento, California 95812-3044

Mr. Guenther Moskat
California CEQA Tracking Center
1001 I Street, 25th Floor
Post Office Box 806
Sacramento, California 95812-0806

S-8b

29

ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

CYNTHIA BRYANT
DIRECTOR

December 3, 2008

Carl Holm
Monterey County
168 W. Alisal Street, 2nd Floor
Salinas, CA 93901-2680

Subject: 2007 Monterey County General Plan
SCH#: 2007121001

See S-5

Dear Carl Holm:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 2, 2008, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

S-8b
See S-5

Document Details Report
State Clearinghouse Data Base

SCH# 2007121001
Project Title 2007 Monterey County General Plan
Lead Agency Monterey County

Type **EIR** Draft EIR

Description Note: Supplement/Subsequent, Program EIR
The General Plan serves as the blueprint for growth in unincorporated inland areas of Monterey County by designating land for various urban and non-urban uses including agricultural, commercial, industrial, residential, and public/quasi-public. GP 2007 carries over most of the policies and land use designations that composed GP 2006, with a number of key revisions. The following describes GP 2007, with items that represent a change from GP 2006 marked with an asterisk or listed under "Other GP 2007 Provisions.

Lead Agency Contact

Name Carl Holm
Agency Monterey County
Phone (916) 755-5103 ***Fax***
email
Address 168 W. Alisal Street, 2nd Floor
City Salinas ***State*** CA ***Zip*** 93901-2680

Project Location

County Monterey
City Carmel-by-the-Sea
Region
Lat / Long
Cross Streets
Parcel No.
Township ***Range*** ***Section*** ***Base***

Proximity to:

Highways multiple
Airports multiple
Railways multiple
Waterways multiple
Schools multiple
Land Use This is an update to the 1982 General Plan effective county-wide. Various zoning and land use designations

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 4; Cal Fire; Department of Parks and Recreation; Office of Emergency Services; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 5; Department of Housing and Community Development; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 3; Native American Heritage Commission; Public Utilities Commission; Department of Toxic Substances Control

Date Received 09/05/2008 ***Start of Review*** 09/05/2008 ***End of Review*** 12/02/2008

Note: Blanks in data fields result from insufficient information provided by lead agency.

S-8b
See S-5

Linda S. Adams
Secretary for
Environmental Protection

Department of Toxic Substances Control

Maureen F. Gorsen, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Arnold Schwarzenegger
Governor

October 31, 2008

RECEIVED
NOV 05 2008
STATE CLEARING HOUSE

clear 10-28-08

Mr. Carl Holm
Planning Manager
Monterey County Planning Department
168 W. Alisal Street, 2nd Floor
Salinas, California 93901

REVIEW OF THE MONTEREY COUNTY 2007 GENERAL PLAN (AMENDED) DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR), SCH #2007121001 DATED SEPTEMBER 2008

Dear Mr. Holm:

Thank you for providing the Department of Toxic Substances Control (DTSC) the opportunity to review the *Monterey County 2007 General Plan Draft Environmental Impact Report* dated September, 2008.

DTSC is the State's lead agency for the environmental cleanup and realignment of closing military bases and maintains jurisdiction over all hazardous substance and hazardous waste issues with the exception of petroleum contamination. The basis for DTSC's regulatory authority is found in California Health and Safety Code, Division 20, Chapters 6.5 (Hazardous Waste Control), Chapter 6.8 (Hazardous Substances Account Act), and California Code of Regulations, Title 22, Division 4.5.

The Central Coast Regional Water Quality Control Broad (CCRWQCB) has authority over the remediation of petroleum sites and the protection of the waters of the State of California. The CCRWQCB regulatory authority is found in the Porter-Cologne Water Quality Control Act, California Water Code and California Code of Regulations, Title 23, Division 3, Chapter 15 and 16. In addition, the Air Resources Board would be concerned with impacts to air quality.

DTSC generally reviews the environmental documents to determine whether the proposed project could have potential impact on public health and worker safety because of the possible presence of residual chemical contaminants and/or munitions and explosives of concern (MEC).

Printed on Recycled Paper

S-8b
See S-5

Mr. Carl Holm
October 31, 2008
Page 2

Please ensure that any reuse planned for property on the former Fort Ord facility is consistent with the approved Fort Ord Reuse Plan dated June 1997. This is the document that the regulators use to ensure cleanup levels support reuse of various parcels.

The comments below were previously submitted to your agency for the 2006 General Plan DEIR. These are being resubmitted to ensure completeness of our review.

Table 1-2 Executive Summary Table, Mitigation Measure 4.3 Water Resources. Volatile Organic Compounds and other contaminants have been found to impact the groundwater resources at numerous sites in Monterey County, and the most notable is the former Fort Ord. Although the Fort Ord and Monterey Peninsula Airport prohibition zones and the associated County Ordinance are mentioned briefly in Section 4.3 (Page 4.3-72) of the DEIR, DTSC encourages the County to research the extent of groundwater impacts that have been identified in Monterey County. For instance, the former Fort Ord drinking water wells have been impacted with low concentrations of Trichloroethene (TCE). These other organic contaminants should be added to mitigation measure Table 1-2 and other appropriate tables throughout the document. Information with respect to the status of the former Fort Ord cleanup program can be found at www.fortordcleanup.com. You can also view various Land Use Covenants for groundwater use restrictions for Fort Ord on the DTSC's web page, www.envirostor.dtsc.ca.gov

Section 4.3.4, Page 4.3-100 Well Competition and Adverse Well Interference. This section describes the impacts of wells in close proximity or adjacent to each other that can be thought of as competing for the same groundwater resources. It should be noted that interference with groundwater contaminant plumes should also be avoided. If upon pumping, the cone of depression interferes with a contaminated groundwater plume, adverse effects will result.

Section 4.13, Hazards and Hazardous Materials. The presence of MEC has been identified in the former Fort Ord area. The MEC areas are being identified, evaluated and remediated by the Army, although DTSC feels that MEC should be listed as a hazardous material on page 4.13-2. In addition, the Army feels that reasonable and prudent actions be taken when performing intrusive activities on the former Fort Ord site. The Army recommends that construction personnel involved in intrusive activity attend MEC recognition and safety training as offered by the Army in accordance with Record of Decision, No Further Action Related to Munitions and Explosives of Concern

S-8b
See S-5

Mr. Carl Holm
October 31, 2008
Page 3

Track 1 Sites, February 2005. The Army requires to be notified, by the landowner, prior to the start of planned intrusive activities. The link for registering for this training can be found at www.fortordcleanup.com.

If you have any questions, please feel free to contact me at (916) 255-3664.

Sincerely,

Theresa McGarry
Hazardous Substances Scientist
Sacramento Office
Brownfields and Environmental Restoration Program

cc: Ms. Gail Youngblood
Fort Ord BRAC Environmental Coordinator
Department of the Army
Environmental and Natural Resources
Post Office Box 5004
Presidio of Monterey, California 93944-5004

Mr. Grant Himebaugh
Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

Office of Planning and Research
State Clearinghouse
1400 Tenth Street
Post Office Box 3044
Sacramento, California 95812-3044

Mr. Guenther Moskat
California CEQA Tracking Center
1001 I Street, 25th Floor
Post Office Box 806
Sacramento, California 95812-0806

S-8c
See S-1

82
(69)

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

February 5, 2009

Monterey County
Planning and Building
Inspection Administration
FEB 10 2009
RECEIVED

Carl Holm
Monterey County
168 W. Alisal Street, 2nd Floor
Salinas, CA 93901-2680

Subject: 2007 Monterey County General Plan
SCH#: 2007121001

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 February 2, 2009. 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 (2007121001) when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

STATE OF CALIFORNIA – THE RESOURCES AGENCY
ARNOLD SCHWARZENEGGER, *Governor*

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877

S-8c
See S-1

Clw
2-2-09
ltr

RECEIVED
FEB 04 2009
STATE CLEARING HOUSE

2007121001
See S-1

February 2, 2009

Carl Holm, Assistant Director
Monterey County Planning Department
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

Subject: **Monterey County 2007 General Plan Draft EIR**

Dear Mr. Holm:

Thank you for the opportunity to comment on the Draft Program Environmental Impact Report (EIR) for the Monterey County 2007 General Plan. Please note that we have previously provided comments on the earlier version of the EIR (letter of April 2, 2004), on the Notice of Preparation for the EIR for the 2006 General Plan document (letter of March 14, 2006), on the Draft EIR for the 2006 General Plan document (letter dated October 16, 2006), and on the General Plan drafts themselves, including, most recently our letter of July 25, 2006. Please continue to consider those previous comments as the County moves forward with subsequent General Plan drafts and environmental review. The purpose of this letter is not to reiterate those past comments, but rather is provide some general feedback regarding the relationship of the General Plan to the Local Coastal Program (LCP) and related CEQA documents.

As we have noted previously, we understand it is not the County's intent to use any part of the General Plan document as the basis for an LCP amendment or update. We further understand that any such LCP update amendments pursued by the County will be pursued separately in the future through their own planning processes. As a result, and due to ongoing budget and staffing shortfalls, we have not thoroughly reviewed the current documents, preferring instead to allot our available review time to future coastal zone documents and proposals. However, despite indications in the text that the General Plan and EIR are meant to cover only the inland portions of the County, cursory review of the EIR document indicates that a significant amount of data collection appears to have been included for the coastal zone portion of the County, and is represented in various exhibits, tables, and text throughout the document (e.g., the Biological Resources chapter shows and describes vegetation cover, special-status species, and habitats in the entire County). Although we understand the need to provide overall context in the EIR, given the County's stated position regarding the General Plan's lack of relationship to the coastal zone, we have not reviewed this information in relation to coastal zone resources and potential LCP updates and/or amendments related thereto. Please clarify if our understanding is incorrect, and the EIR/General Plan is intended to form the basis for future LCP planning. If so, we may have more comments for you.

S-8c
See S-1

Carl Holm, Monterey County
2007 General Plan Draft EIR
February 2, 2009
Page 2

In any event, we look forward to seeing a revised final EIR that addresses these and previous comments that we have submitted. Please contact me if you have any questions or would like to discuss our comments further.

Sincerely,

Katie Morange

Katie Morange
Coastal Planner

cc: OPR Clearinghouse
AMBAG Clearinghouse

S-9 77

California Regional Water Quality Control Board
Central Coast Region

Linda Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

Internet Address: http://www.swrcb.ca.gov/rwqcb3
895 Aerovista Place, Suite 101, San Luis Obispo, California 93401
Phone (805) 549-3147 • FAX (805) 543-0397

February 5, 2009

BY ELECTRONIC MAIL

Carl Holm
holmcp@co.monterey.ca.us.
County of Monterey, Resource Management Agency
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

Monterey County
Planning and Building
Inspection Administration
FEB 05 2009
RECEIVED
by e-mail 2-5-09
4:20pm

Dear Mr. Holm:

DRAFT ENVIRONMENTAL IMPACT REPORT, 2007 MONTEREY COUNTY GENERAL PLAN, MONTEREY COUNTY, SCH# 2007121001

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the 2007 Monterey County General Plan (General Plan). The Central Coast Regional Water Quality Control Board (Water Board) is a responsible agency under the California Environmental Quality Act (CEQA). Water Board staff understands that the project is a comprehensive update of the existing 1982 Monterey County General Plan.

General/Opening Comments

1

Water Board staff supports and commends Monterey County for developing the goals and policies contained within the General Plan addressing issues critical to effective watershed protection such as the development of sustainable water supplies, groundwater recharge area protection, stream setbacks, habitat protection, centralized development, water conservation and reuse, centralized wastewater treatment and recycling, and collaborative regional planning. The successful implementation of policies addressing these critical issues should effectively restore and protect water quality (i.e. help mitigate potential cumulative impacts from projected land use activities). Monterey County is on the forefront of addressing some of these critical issues.

2

In some cases, the DEIR does not appear to link policies within the General Plan that could be applicable to impacts as mitigation measures. Given the DEIR Executive Summary Table (1-2) is not specific regarding which General Plan goals and policies apply, and the environmental impact discussions within DEIR section 4 neglect to identify all applicable General Plan policies as mitigation measures, we must assume that all policies within the General Plan are binding mitigation measures pursuant to the DEIR. We did not attempt to identify and itemize General Plan policies as DEIR mitigation measures for each and every discussed "Issue/Impact." As such, our comments below are generally in the form of issue discussions accompanied by

California Environmental Protection Agency

Recycled Paper

suggested modifications to or additional policies within the General Plan that should be implemented as measures to mitigate the environmental impact of General Plan implementation. 2

Sustainable Water Supply & Healthy Watershed Functions -- General Comments

Water demand for the existing developed areas of Monterey County is currently not sustainable and is resulting in cumulative watershed (both surface and groundwater) impacts. This is alluded to in various portions of the DEIR Water Resources section[1]. The DEIR indicates the development and implementation of new water sources, conjunctive use strategies, and conservation and reuse are required to meet future demand. However, the DEIR does not recognize that these measures along with the restoration and protection of existing water resources are required to meet **existing** demand in a sustainable manner. Monterey County must take more holistic approach to protect and manage its water resources. A holistic water resource management approach requires healthy watershed functions as the primary goals and includes metrics for meeting sustainable water supply demand. This holistic approach also includes a clear understanding of the interrelationships between surface and groundwater resources within and between each of the watersheds. The economic viability and environmental health of Monterey County (particularly the health of its watersheds) are intricately dependent on one another. 3

Sustainable water supplies for future development can only be achieved within healthy functioning watersheds. Abundant and clean water does not exist in watersheds that do not function properly. Therefore, the goal for achieving sustainable water supplies to meet existing and future water demand should be met first and foremost through restoring and maintaining healthy watershed functions. We agree the potential impacts to water supply (surface waters and groundwater basins) are significant as a result of future growth within Monterey County. However, we are confident they are also avoidable (not unavoidable as indicated in the DEIR) should demand be met through sustainable practices and comprehensive watershed management programs that restore and maintain healthy watershed functions. The development of sustainable water supplies to meet future demand is predicated on restoring healthy watershed functions under existing developed conditions prior to placing additional demands on the already strained watersheds.

Healthy watersheds have physical and biological integrity, with conditions that are observable and measurable. Healthy watersheds meet all of the following conditions:

[1] The Seaside Aquifer and Pajaro Valley Groundwater Basin are currently in overdraft resulting in seawater intrusion and other water quality impacts associated with diminished assimilative capacity and concentration effects due to reduced aquifer volume and contaminant loading (primarily nutrients and salts). The Carmel River and Carmel River Lagoon riparian habitats are currently impacted as a result of California America Water Company's over allocation of approximately 10,730 acre-feet per year from the Carmel River which is the primary public water supply (approximately 75%) for most of the Monterey Peninsula. DEIR section 1.6.1.2 states: "The three major watersheds in the County (Salinas, Carmel and Pajaro Rivers) are all in state of overdraft." In addition, there are extensive and well documented nitrate impacts throughout the Salinas Valley.

- Rainfall surface runoff at pre-development levels;
- Watershed storage of runoff, through infiltration, recharge, baseflow, and interflow, at pre-development levels;
- Watercourse geomorphic regimes within natural ranges (stream banks are stable within natural range; sediment supply and transport within natural ranges); and
- Optimal riparian and aquatic habitats (including: stream flow, in-channel, water column, and biotic conditions).

Consequently, the restoration and maintenance of healthy watershed functions could be achieved by watershed management plans that: 3

- Maximize infiltration of clean storm water, and minimize runoff volume and rate;
- Protect riparian areas, wetlands, and their buffer zones;
- Minimize pollutant loading (to surface water and groundwater);
- Protect recharge areas;
- Maximize groundwater recharge (that will not result in groundwater impacts);
- Minimize and eliminate overdraft;
- Maintain surface water baseflows;
- Promote water conservation and reuse;
- Provide sufficient ongoing monitoring; and
- Provide long-term watershed protection.

The General Plan contains numerous goals and policies addressing various components of what Water Board staff would consider a comprehensive watershed management program. However, the DEIR and General Plan do not link them together as part of a long-term comprehensive watershed management strategy. The General Plan should include a clear strategy that considers healthy watershed functions as necessary to assure sustainable water supplies. The strategy should establish realistic goals that can be evaluated by measureable outcomes.

Regional Watershed Management

The water supply issues facing Monterey County require a collaborative and integrative approach to the development of sustainable water supplies. Monterey County's ongoing collaborative development and implementation of watershed management plans and groundwater management plans is discussed in section 4.3.3.2 of the DEIR and the DEIR proposes additional policies (PS-3.16, PS-3.17 and PS-3.18) under mitigation measures WR-1 and WR-2 for the collaborative development of new water supply projects. However, Water Board staff could not find any additional specific policies within the General Plan or mitigation measures within the DEIR specifically identifying regional watershed management as a priority. Water Board staff strongly supports Monterey County's current efforts in developing regional solutions to developing sustainable water supplies given they clearly identify management of the watersheds as ecosystems and not just that of a water [supply] resource. 4

DEIR Impact WR-3: Agricultural and resource development (i.e., limited timber harvesting and mineral resources extraction) land uses consistent with the General Plan would increase sediment and nutrients in downstream waterways and violate water quality standards. (Less-Than-Significant Impact):

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to conduct or require a third party to conduct a regional, collaborative [with San Luis Obispo County] fluvial geomorphology study of the Salinas River watershed to evaluate impacts associated with in-stream and off-channel sand and gravel mining and other activities.[2] This policy statement could fit in the General Plan under Mineral Resources Goal OS-2. 5

DEIR Impact WR-1: Residential, commercial, industrial, and public uses consistent with the 2007 General Plan would introduce additional nonpoint source pollutants to downstream surface waters, substantially degrading water quality. (Less-Than-Significant Impact):

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to add "Impacted soil and groundwater sites" to General Plan Public Services Policy PS-2.6. 6

DEIR Impact WR-4: Land uses and development consistent with the 2007 General Plan would exceed the capacity of existing water supplies and necessitate the acquisition of new supplies to meet expected demands (Significant and Unavoidable Impact);

DEIR Impact WR-6: Land uses and development consistent with the 2007 General Plan would increase demand on groundwater supplies in some areas; the associated increased well pumping would result in the continued decline of groundwater levels and accelerated overdraft. (Significant and Unavoidable Impact); 7

DEIR Impact BIO-2: Potential Adverse Effects on Sensitive Riparian Habitat, Other Sensitive Natural Communities and on Federal and State Jurisdictional Waters and Wetlands (Less Than Significant with Mitigation for 2030 Planning Horizon and Significant and Unavoidable with Mitigation for Buildout);

DEIR Impact BIO-3.1: Potential Disturbance and Loss of Native Fish and Wildlife Species Movement Corridors (Less than Significant with Mitigation for 2030 Planning Horizon and for Buildout):

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to develop a policy to continue the collaborative development and implementation of watershed

[2] See June 4, 2008 RWQCB letter to San Luis Obispo County Department of Planning and Building regarding: Viborg/Calkins Mitigated Negative Declaration (Conditional Use Permit ED07-082)

management plans[3] and develop additional regional watershed management plans as necessary to assure healthy functioning watersheds and sustainable water supplies. All new watershed management plans or updates to existing plans shall include performance goals, metrics and monitoring specifically focused on restoring and maintaining healthy watershed functions. This policy statement could fit in the General Plan Public Services Policy statement under Water Quality and Supply Goal PS-2. 7

DEIR Impact WR-4, WR-6, BIO-2 and BIO-3.1:

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to develop a policy to continue the collaborative development and implementation of groundwater management plans and develop additional regional groundwater management plans as necessary to assure healthy functioning watersheds and sustainable water supplies. All new groundwater management plans or updates to existing plans shall include performance goals, metrics and monitoring specifically focused on restoring and maintaining healthy watershed functions. This policy statement could fit in the General Plan Public Services Policy statement under Water Quality and Supply Goal PS-2. 8

DEIR Impact WR-7: Land uses and development consistent with the 2007 General Plan would increase demand on groundwater supplies in areas currently experiencing or susceptible to saltwater intrusion. Increased groundwater pumping in certain coastal areas would result in increased saltwater intrusion. (Significant and Unavoidable Impact);

DEIR Impact WR-9: Land uses and development consistent with the 2007 General Plan would result in an increase in the number of private wells in unincorporated areas of the county. Approval of wells in these areas would result in well interference impacts. (Less-Than- Significant Impact); 9

DEIR Impact WR-4, WR-6, BIO-2 and BIO-3.1:

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to modify General Plan Public Services Goal PS-3.15 as follows and include a realistic near term timeline for development and implementation of the proposed guidelines:

To ensure accuracy and consistency in the evaluation of water supply availability, Monterey County Health Department, in coordination with the MCWRA, shall develop guidelines and procedures for conducting water supply assessments and determining water availability. Water supply assessments shall be based on cumulative sustainable demand required to maintain healthy watershed functions (i.e. will not result in effects

[3] Salinas River Watershed Management Action Plan; Carmel River Watershed Assessment and Action Plan; Pajaro Watershed Water Quality Management Plan; Pajaro River Watershed Integrated Regional Water Management Plan; Monterey Peninsula, Carmel Bay and South Monterey Bay Integrated Regional Water Management Plan.

on instream flows necessary to support riparian vegetation, wetlands, fish, and other aquatic life, including migration potential for steelhead) and to prevent overdraft and seawater intrusion. Adequate availability and provision of water supply, treatment, and conveyance facilities shall be assured to the satisfaction of Monterey County prior to approval of final subdivision maps or any changes in the General Plan Land Use or Zoning designations. 9

DEIR Impact WR-1, WR-3 and WR-9:

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to actively participate in the development and implementation of the Salinas Valley groundwater nitrate study required pursuant to Senate Bill 1, Perata (Water quality, flood control, water storage, and wildlife preservation) adopted on September 30, 2008. This policy could fit in the General Plan Public Services Policy statement under Water Quality and Supply Goal PS-2. 10

General Plan Public Services Goal PS-2: Assure an adequate and safe water supply to meet the county's current and long-term needs:

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to modify General Plan Public Services Goal PS-2 in the following manner: 11

Assure healthy functioning watersheds to provide an adequate, sustainable and safe water supply to meet the county's current and long-term needs.

Groundwater

Groundwater management is an integral component of watershed management given the interrelationships between surface water and groundwater quality and quantity. The primary groundwater quality and quantity issues within Monterey County are overdraft, seawater intrusion, contaminant loading [especially nitrate and salts] and recharge area protection. Water Board staff commends Monterey County for their current regional efforts and for developing goals and policies within the General Plan that address these issues. Subsequently, our recommended mitigation measures below are generally programmatic in nature and build upon the existing General Plan policies and various regional projects currently being developed or implemented by Monterey County. 12

DEIR Impact WR-1 and WR-6:

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to develop a policy requiring project applicants for new development to identify and delineate groundwater recharge areas within the hydrologic influence of the proposed project. This policy statement could fit in the General Plan Water Quality and Supply Goal PS-2. 13

Monterey County should use these data to update and maintain the Hydrologic Resources Constraints and Hazards Database within Monterey County Geographic Information System (GIS) identified in General Plan Public Services Policy statement PS-2.6. 13

DEIR Impact WR-1:

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to develop an ordinance prohibiting the siting of commercial and industrial facilities producing or handling hazardous chemicals (i.e. gas stations, dry cleaners, fertilizer/herbicide/pesticide facilities, etc.) within known groundwater recharge areas or sole source [water supply] aquifers. This policy could fit in the General Plan under Water Quality and Supply Goal PS-2. 14

Wastewater Management– General Comments

To mitigate the environmental impacts of development consistent with the General Plan, in addressing wastewater, the EIR should include a mitigation measure requiring Monterey County to identify, assess, document, and address requirements of the Basin Plan and other surface water and groundwater protection policies established within Monterey County. Requirements of these plans and policies should protect surface water and groundwater beneficial uses and ensure proper wastewater treatment system planning, design, construction, operation, and maintenance mechanisms.

The Basin Plan emphasizes the pursuit of regional wastewater management and includes the following Management Principle (Chapter V, Section IIIB): 15

"The number of waste sources and independent treatment facilities shall be minimized and the consolidated systems shall maximize their capacities for wastewater reclamation, assure efficient management of, and meet potential demand for reclaimed water."

That principle conforms to the Basin Plan goals (Chapter IV, Section 1):

"To manage municipal and industrial wastewater disposal as part of an integrated system of fresh water supplies to achieve maximum benefit of fresh water resources for present and future beneficial uses and to achieve harmony with the natural environment, and to continually improve waste treatment systems and processes to assure consistent high quality effluent based on best economically achievable technology."

To achieve Basin Plan goals and management principles, use of onsite septic systems should be minimized where a regional wastewater system is available. To mitigate the environmental impacts of development consistent with the General Plan, the EIR should 16

S-9

Monterey County 8 **February 5, 2009**

include a mitigation measure requiring Monterey County to consider onsite systems as temporary measures until access to a regional wastewater system is feasible.

To mitigate the environmental impacts of development for 2030 and 2092 ("Buildout") consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to have policies that: a) strongly favor new developments being annexed into regional Monterey County wastewater treatment system service areas, connected to the nearest urban or rural center collection system, or b) require Monterey County to build a new wastewater treatment system to meet the needs of the planned development. To justify a new wastewater treatment system, the Water Board would require: a) a detailed third party evaluation indicating connection to the nearest Monterey County regional, urban, or rural center wastewater and reclamation facility is not feasible, or b) Monterey County to develop a Water Board approved Urban Area Wastewater Master Plan.

It is the joint goal of the Water Board and the Monterey County Environmental Health Division (EHD) to protect water quality and public health from impacts associated with onsite wastewater discharges (i.e., septic systems). A memorandum of understanding (MOU) between the Water Board and the EHD has historically been in effect but is in the process of renewal. This MOU defines cooperative roles for the EHD and the Water Board with respect to compliance with the purpose and intent of statewide standards, Basin Plan criteria, and applicable local regulations governing onsite wastewater systems. The Water Board intends this MOU to assist in creation of a partnership between the Water Board and the EHD to protect water quality and public health in areas where the utilization of onsite wastewater systems occur. Under the MOU, the EHD shall ensure that the siting, design, approval, installation, operation, maintenance, and monitoring of all onsite wastewater systems shall be in conformance with Basin Plan requirements. 16

To mitigate the environmental impacts to groundwater and surface water of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to establish a policy requiring the renewal of and adherence to the MOU between the Water Board and EHD. The MOU should be updated as needed.

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to develop and implement an onsite wastewater management plan in urbanizing areas to investigate and mitigate long-term cumulative impacts resulting from continued use of onsite wastewater systems. The plan should be a comprehensive planning tool to specify onsite wastewater system limitations to prevent groundwater or surface water degradation.

Wastewater Management - Home Owner Associations and Community Service Areas

Our records indicate that Monterey County wastewater treatment systems, reclamation, and disposal facilities operated by home owners associations (HOAs), developers, or other similar private organizations have often lead to environmental impacts, since no 17

S-9

Monterey County 9 **February 5, 2009**

responsible party is available to address the failing wastewater systems. Highland Sanitary Association and the various Las Palmas homeowners associations are noteworthy examples. The DEIR should address this environmental impact. The General Plan Public Service policies PS-4.3 and PS-4.7 do not establish criteria specifying that these organizations be omitted as an acceptable "provider" of new wastewater systems.

To mitigate the environmental impacts to surface water and groundwater from new wastewater systems developed under the General Plan, the EIR should include a mitigation measure requiring Monterey County to adopt an enforceable regulation prohibiting HOAs, developers, or other similar private organizations from being designated service provider, unless it is infeasible for Monterey County to establish a community service area (CSA) or similar public service provider. A CSA or similar should have the ability to levy additional fees as necessary to ensure an adequate funding and management structure is in place for operation and maintenance of the wastewater systems. At a minimum, mitigation measures should include policies that require financial guarantees (e.g., performance bonds) for the operation and maintenance of the system. Such systems also must be operated by an appropriately qualified and licensed operator. Property deed restrictions may be necessary in some instances to ensure adequate long term operation and maintenance. 17

Wastewater Management - Salts Management

Salts (sodium, chloride, and total dissolved solids) loading from wastewater is a major cause of groundwater quality degradation. Salty wastewater also inhibits a community's ability to recycle water. The DEIR should address this environmental impact. To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to adopt an enforceable regulation requiring all brine disposal to be performed offsite at a certified brine receiving facility, or be disposed of in a manner that will not have an effect on groundwater quality. In addition, mitigation measures for salt management should include a prohibition of self-regenerating water softeners (those which discharge salt) in all new development. These mitigation measures are key to reducing the environmental impacts of wastewater discharges. 18

Wastewater Management - Water Recycling

In California Water Code Section 13510, the state legislature declares, "...that the people of the state have a primary interest in the development of facilities to recycle water containing waste to supplement existing surface and underground supplies and to assist in meeting the future water requirements of the state." The Water Board strongly encourages the use of recycled water for irrigation and other non-potable uses. To this end, the EIR should include a mitigation measure requiring Monterey County to be an active participant in the implementation of the adopted State Water Resources Control Board Water Recycling Policy[4] by: 19

[4] Currently available for public review and pending approval at the February 3, 2009 State Water Resources Control Board meeting. Information available at: http://www.swrcb.ca.gov/water_issues/programs/water_recycling_policy/index.shtml

a. Promoting and mandating water recycling for new development projects within Monterey County's jurisdiction.
b. Actively participating in the locally driven and controlled collaborative process for the preparation of salt and nutrient management plans for each basin/sub-basin within Monterey County, including compliance with CEQA.

DEIR Impact WR-5: Land uses and development consistent with the 2007 General Plan would increase the demand for water storage, treatment, and conveyance facilities that would have significant secondary impacts on the environment Significant and Unavoidable Impact); 19

DEIR Impact WR-8: Land uses and development consistent with the 2007 General Plan would result in sewer- and septic-related water quality impacts, including those associated with reuse of treated water and migration of septic tank leachfield wastewater effluent to groundwater that would violate water quality standards. (Less-Than- Significant Impact)

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to include conservation and recycling in General Plan Public Services Statement PS-3.9.

Wastewater Management – Grey Water Ordinance

DEIR Impact WR-4 and WR-5: 20

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to include a policy to develop a countywide grey water ordinance in support of General Plan Public Services Policy Statement PS-3.10.

Wastewater Management – Sewage Disposal

DEIR Impact WR-8: 21

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to update its sewage disposal ordinances contained within Chapter 15.20 of Monterey County Code to be consistent with the development of onsite wastewater management plans and the most current onsite wastewater system criteria with the Basin Plan.

Wastewater Management - Future Connection Mandates 22

State Water Resources Control Board proposed Water Recycling Policy addresses the following topics: benefits of recycled water; mandates for its use; interagency roles; collaborative development of basin/sub-basin salt/nutrient management plans; landscape irrigation projects including streamlined permitting; groundwater recharge projects; antidegradation; emerging constituents/chemicals of emerging concern; and incentives for the use of recycled water.

General Plan Public Service policies PS-4.5 and PS-4.6 require Monterey County staff to develop criteria and provide proof of the adequacy of wastewater treatment services for new facilities. These policies do not apply the requirement to existing satellite wastewater systems for possible future connections. Continuance of existing satellite wastewater treatment systems can have cumulative impacts to surface waters and groundwater. To mitigate for the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to include a Public Service policy stating existing satellite wastewater treatment systems must establish a connection to regional, urban, or rural center wastewater treatment system when these systems become available. 22

In addition, the mitigation measure should require adoption of an enforceable regulation requiring any new development's wastewater collection system be tied into the nearest county regional, urban, or rural center wastewater treatment facility when available, followed up by abandonment of an existing satellite system, if applicable. Monterey County should require assurances that the existing wastewater system is capable of, and agrees to accept maximum projected wastewater flows from the project at ultimate build-out. These mitigating measures are key to reducing impacts to surface water and groundwater.

Agriculture – Stream Setback

DEIR Impact BIO-2:

According to the DEIR, existing agricultural land use is not considered a significant impact on Sensitive Riparian Habitat because of General Plan polices AG-5.1 and AG-5.2. These policies support programs and policies that reduce erosion and protect surface and ground water, but they do not directly protect Sensitive Riparian Habitat, other sensitive natural communities or federal and state jurisdictional waters and wetlands. To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to develop policies that explicitly ensure the compatibility of agricultural uses and riparian and aquatic habitat. 23

The stream setback ordinance required as mitigation for Impact BIO-2 would be a valuable measure to protect riparian habitat. The description of the mitigation measure recommends that the ordinance apply to discretionary development and to conversion of previously uncultivated agricultural land on slopes greater than 10% for erodible soils and greater than 15% for normal soil. To mitigate the environmental impacts of development consistent with the General Plan, the ordinance should apply to newly cultivated agricultural lands **and** conversion of existing agricultural uses to more intensive crops that may have greater impact on the environment, such as strawberries, nursery and greenhouse crops. Intensive agriculture has a high potential to impact riparian habitats on all slopes and soil types. The ordinance should remove slope as a requirement for applicability.

Agriculture – Food Safety and Environmental Protection

DEIR Impact BIO-3.1:

Environmental issues and impacts from agricultural land use are not acknowledged and assessed in the DEIR. The impacts of irrigated agriculture on biological resources have intensified in recent years because of food safety concerns, such as potential exposure of crops to pathogens such as E. Coli and salmonella. Some produce buyers have required growers to demonstrate and document that potential vectors for these pathogens such as wildlife and domestic live stock are excluded from production fields and that there are distinct zones between cultivated production and habitats. Currently, common food safety practices include the removal of vegetated buffers, installation of wildlife exclusionary fences along corridors, removal and trimming of riparian vegetation, installation of rodent and bird poison bait stations between habitats and fields, removal of trees and non-productive vegetation from field edges, and the draining or treating of reservoirs and basins. 24

To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to develop supporting policies that ensure safe food supplies **and** protection of environmental resources. Monterey County should develop a program that coordinates food safety and environmental protection requirements for growers.

Agriculture – Pesticides and Agency Coordination

DEIR Impact WR-3:

The DEIR Impact WR-3 summary states that nutrients and sediment in downstream waterways are impacts from agricultural land uses. Pesticides should be included along with sediment and nutrients. Several water bodies in Monterey County are on the Clean Water Act Section 303(d) list for impairments from pesticides. Recent water quality monitoring data for agricultural drainages in Monterey County indicate the presence of currently applied agricultural pesticides at concentrations that have been documented to cause toxicity to aquatic species. 25

Policies in the Agricultural Land Use section of the General Plan support programs and policies that protect and enhance surface and ground water resources. In addition to supporting these programs, the EIR should include a mitigation measure requiring Monterey County to develop programs with County Agricultural Commissioner and Monterey County Water Resources Agency that work directly with agriculture to protect and enhance water quality from agricultural discharges. These programs should coordinate with the Water Board Conditional Waiver for Irrigated Agriculture Program and other Water Board programs.

Hydromodification 26

Increased runoff from developed areas is the key cause of other adverse water quality and beneficial use effects. Attention to maintaining the pre-development hydrograph will prevent or minimize other problems and will limit the need for other analysis and mitigation.

Projects in Monterey County may be subject to the NPDES Phase II Municipal Stormwater Permit (Permit). The Permit requires new development and significant redevelopment projects to reduce runoff volume and pollutant load to the Maximum Extent Practicable (MEP). In most cases, MEP standards are not met by conventional site layouts, construction methods, and storm water conveyance systems with "end of pipe" basins and treatment systems that do not address the changes in volume and rates of storm water runoff and urban pollutants (including thermal pollution). Low Impact Development practices meet the MEP standard and are more effective at reducing pollutants in storm water runoff, at a reasonable cost.

Low Impact Development (LID) is an alternative site design strategy that uses natural and engineered infiltration and storage techniques to control stormwater runoff where it is generated. LID practices are dispersed across a site to minimize runoff. LID serves to preserve the hydrologic and environmental functions altered by conventional stormwater management. Water Board staff considers a project that includes all of the following elements to be a "Low Impact Development" project: runoff volume control, peak runoff rate control, and flow frequency duration control. 26

> DEIR Impact PSU-7: Development and land use activities contemplated in the General Plan may result in the need for new or expanded stormwater drainage facilities. (Less-Than-Significant Impact);
>
> DEIR Mitigation Measure PS-1: Policy S-3.9 - require all future developments to implement the most feasible number of Low Impact Development (LID) techniques into their stormwater management plan. The LID techniques may include, but are not limited to, grassy swales, rain gardens, bioretention cells, tree box:

Properly implemented LID is appropriate mitigation to prevent adverse water quality and beneficial use effects from runoff of developed areas, not just to decrease the need for new or expanded stormwater drainage facilities. The stated mitigation measure looks at LID on a technique (understood to be a Best Management Practice) level. To be effective, LID needs to be invoked as a design approach and implemented into the early site design and planning phases.

A development that only incorporates some LID techniques into an otherwise conventional design would not likely achieve the water quality benefit that comes from a project that is designed using LID principles. To mitigate for the environmental impacts of the General Plan, the mitigation measure should require projects to contain all of these elements. The DEIR also does not document the potential cumulative environmental impacts to watershed hydrology from existing and other planned development in the area.

S-9

Monterey County **14** **February 5, 2009**

DEIR Impact WR-10: Land use and development consistent with the General Plan would result in alterations to existing drainage patterns. Such changes would increase erosion, both in overland flow paths and in drainage swales and creeks. (Less-Than-Significant Impact):

The DEIR discussion for WR-10 states that development consistent with the General Plan would result in a gradual increase in impervious cover. To mitigate for the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to implement a policy to limit the percentage of impervious cover for developments and to examine the effect of imperviousness on a watershed scale.

Detention ponds as a mitigation approach for hydrologic changes are not sufficient because they replace only a scant fraction of the storage capacity of hillslopes that was lost, convert what was once spatially distributed subsurface runoff into a point discharge at a surface water outfall, and reduce the rate and change the location of groundwater recharge and subsequent discharge[5]. To mitigate the environmental impacts of development consistent with the General Plan, the EIR should include a mitigation measure requiring Monterey County to require, where feasible, new development to be consistent with a Low Impact Development project as described above. 26

DEIR Impact WR-11: Land uses and development consistent with the General Plan would result in increases in stormwater runoff and peak discharge. Existing storm drain systems, including urban creeks and rivers, may be incapable of accommodating increased flows, potentially resulting in increased onsite or offsite flooding. (Less-Than-Significant Impact):

General Plan Safety Element Policy S-3.1 requires post-development, offsite peak flow drainage limited to pre-development peak flow drainage. While controlling the peak flow is important for flood control and stream erosion, the environmental impacts of development consistent with the General Plan altering the hydrology are not sufficiently addressed by only limiting the peak flow. If one only controls the peak, the resulting drainage can cause downstream channel erosion/modification and impact water quality and fish habitat.

Riparian and Wetland Buffers

DEIR Impact BIO-2;

DEIR Mitigation Measure BIO-1.1: Baseline Inventory of Landcover, Special Status Species Habitat, Sensitive Natural Communities, Riparian Habitat, and Wetlands in Monterey County; 27

[5] Konrad, C. &, Booth, D. (2005). Hydrologic changes in urban streams and their ecological significance. *American Fisheries Society Symposium*, 47:157-177

California Environmental Protection Agency

Recycled Paper

S-9

Monterey County **15** **February 5, 2009**

DEIR Mitigation Measure BIO-2.1: Stream Setback Ordinance:

The functions of riparian corridors include streambank stability, sediment reduction, and flood protection. The EIR should include a mitigation measure requiring Monterey County to complete a Riparian Corridor Study in order to develop a riparian protection ordinance for Monterey County. In addition, Monterey County should establish realistic near term timelines for the implementation of mitigation measures BIO-1.1 and BIO-2.1 regarding the identification and mapping of critical habitat and the development of a countywide stream setback ordinance. (Note: These mitigation measures are currently required to restore and protect riparian habitat under existing developed conditions.) Mitigation measure BIO-2.1 should include the following language: "Monterey County shall coordinate with the Central Coast Regional Water Quality Control Board for the development and review of the county-wide stream setback ordinance." 27

The proposed mitigation measure BIO-2.1 develops a stream setback ordinance but does not address setbacks to wetlands. Wetlands are both a highly productive and sensitive resources biologically, support a great diversity of plant and animal species, provide essential habitat for a high number of special-status species and serve critical water purification and groundwater recharge functions. Development setbacks are necessary around wetlands to provide a buffer to prevent disturbance of important wildlife habitat, and to filter sediments and pollutants from disturbed areas and urban runoff. To mitigate the environmental impacts of the proposed General Plan development, in addition to the proposed Stream Setback Ordinance, Monterey County should develop an ordinance for wetland setbacks. The Greater Monterey Peninsula Plan calls for a setback to wetlands. The remainder of Monterey County should have a similar wetland setback requirement. Development should be set back a minimum distance to protect the wetland and provide an upland buffer. Larger setbacks should apply to wetlands supporting special-status species or associated with riparian systems and lands under tidal influence.

Cumulative Impacts Analysis – Water Resources

DEIR Impact CUM-2: Surface Water Quality:

The cumulative impacts analysis does not consider the interrelationships between groundwater and surface water quantity and quality. This is likely the result of the lack of a specific framework for the development and implementation of a long term watershed management strategy as part of the General Plan.

The incremental effects of the land use related impacts and increased water supply demand on "surface water quality" is "cumulatively considerable" not "less than cumulatively considerable" as stated under CUM-2 of the Executive Summary Table (2-1) and section 6.4.3.3 of the DEIR. Existing land use conditions and water supply demand has resulted not only in well documented surface water quality impacts, but also surface water quantity related impacts. Surface water quality impacts are primarily attributable to contaminant loading (i.e. sediment, nutrients, pathogens and herbicides/pesticides, etc.) and loss of riparian habitat (buffers). Water quantity related 28

California Environmental Protection Agency

Recycled Paper

S-9

Monterey County **16** **February 5, 2009**

habitat impacts resulting in the loss or degradation of aquatic and riparian habitat are attributable to overdraft – both surface water diversion and groundwater pumping - and loss of recharge due to impervious surfaces and storm water runoff that result in decreased surface water and subsurface base flows. By virtue of the interrelationship between groundwater and surface water quantity and quality alone, a cumulative impacts analysis end point of "cumulatively considerable" for surface water quality would be anticipated. This would be in agreement with that of the cumulative impacts analysis results for groundwater quality.

The analysis outlined in DEIR section 6.4.3.3 only considers surface water quality related impacts and suggests cumulative surface water quality impacts will be primarily mitigated via the Water Board's implementation of TMDLs and the irrigated agriculture general waiver program, along with a handful of policy statements within the General Plan. We could evaluate the appropriateness of mitigation measures if the DEIR described the Monterey County measures that will be implemented to address TMDLs. Additional General Plan policies and mitigation measures related to storm water runoff, groundwater recharge, sustainable water supply development and stream setbacks also warrant discussion within the cumulative impacts analysis. Although we anticipate measurable success in mitigating additional surface water quality impacts with these programs/policies on a project by project basis, the potential cumulative impacts of all the land use related potential water quality impacts will go unchecked without a long term watershed management strategy that links them all together. 28

In addition, for a long term watershed management strategy to be effective, it needs to be based on clearly identified performance goals and metrics for achieving them that are based on the physical, chemical and biological parameters of healthy watershed functions. Only then will Monterey County be able to provide long term sustainable water supplies for projected growth.

Monterey County's sweeping authority over land use practices and water supply is the primary controlling factor in mitigating potential water quality and quantity impacts on a watershed basis above. Therefore, the collaborative development and implementation of a successful long term watershed plan lies primarily within County oversight. That responsibility cannot be considered separately from the General Plan.

Thank you for your attention to this letter. We look forward to your responses in the EIR. If you have questions, or would like to meet to discuss these comments, please contact **Jennifer Epp at (805) 594-6181**, or Matt Thompson at (805) 549-3159.

Sincerely,

Roger W. Briggs
Executive Officer

S:\CEQA\Comment Letters\Monterey County\Monterey County 2007 General Plan.doc

California Environmental Protection Agency

Recycled Paper

S-9

Monterey County **17** **February 5, 2009**

CC:

Allen Stoh
Director
Monterey County
Environmental Health
strohaj@co.monterey.ca.us

Richard Le Warne
Assistant Director
Monterey County
Environmental Health
lewarner@co.monterey.ca.us

Curtis Weeks
General Manager
Monterey County
Water Resources Agency
weeksc@co.monterey.ca.us

Pat Treffry
Monterey County
Environmental Health
treffrypt@co.monterey.ca.us

Alana Knaster
Deputy Director
Monterey County
Resource Management Agency
knastera@co.monterey.ca.us

Eric Lauritzen
Monterey County
Ag. Commissioner
lauritzene@co.monterey.ca.us

Mary Anne Dennis
Monterey County
Water/Land Resource Protection Branch
dennism@co.monterey.ca.us

Kathleen Thomasberg
Monterey County
Water Resources Agency
thomasbergk@co.monterey.ca.us

Yazdan Emrani
Director
Monterey County
Public Works
emraniy@co.monterey.ca.us

Roger Van Horn
Monterey County
Environmental Health
vanhornrw@co.monterey.ca.us

Elizabeth Krafft
Monterey County
Water Resources Agency
kraffte@co.monterey.ca.us

California Environmental Protection Agency

Recycled Paper

Comment Letters
Local Agencies

L-1a

AMBAG
ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

October 13, 2008

Mr. Carl Holm
Monterey County
Planning Department
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

RE: MCH# 20080902 – Draft Environmental Impact Report for the Draft Environmental Impact Report for the 2007 Monterey Co. General Plan

Dear Mr. Holm:

AMBAG's Regional Clearinghouse circulated a summary of notice of your environmental document to our member agencies and interested parties for review and comment. 1

The AMBAG Board of Directors considered the project on **October 8, 2008** and has no comments at this time.

Thank you for complying with the Clearinghouse process.

Sincerely,

Nicolas Papadakis
Executive Director

SERVING OUR REGIONAL COMMUNITY SINCE 1968
445 RESERVATION ROAD, SUITE G ✦ P.O. BOX 809 ✦ MARINA, CA 93933-0809
(831) 883-3750 ✦ FAX (831) 883-3755 ✦ www.ambag.org

L-1b

AMBAG
ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

Monterey County
Planning and Building
Inspection Administration
FEB 0 3 2009
RECEIVED

January 23, 2009

Mr. Carl Holm
County of Monterey
Planning Department
168 W. Alisal Street, 1st Floor
Salinas, CA 93901

RE: MCH# 20081208 – Notice of Availability 2007 General Plan Draft EIR

Dear Mr. Holm:

AMBAG's Regional Clearinghouse circulated a summary of notice of your environmental document to our member agencies and interested parties for review and comment. 1

The AMBAG Board of Directors considered the project on **January 14, 2009** and has no comments at this time.

Thank you for complying with the Clearinghouse process.

Sincerely,

John Doughty
Executive Director

SERVING OUR REGIONAL COMMUNITY SINCE 1968
445 RESERVATION ROAD, SUITE G ✦ P.O. BOX 809 ✦ MARINA, CA 93933-0809
(831) 883-3750 ✦ FAX (831) 883-3755 ✦ www.ambag.org

L-2

City of Gonzales

Wine Capital — City of Gonzales — Gonzales, California — Monterey County

P.O. BOX 647
PHONE: (888) 675-5000

147 FOURTH ST.
FAX: (831) 675-2644

GONZALES, CALIFORNIA 93926
www.ci.gonzales.ca.us

Monterey County
Planning and Building
Inspection Administration

JAN 0 6 2009

RECEIVED

January 5, 2009

Maria Orozco
Mayor

Scott Funk
Mayor Pro Tem

Matt Gourley
Councilmember

Rene L. Mendez
City Manager

Fernando Armenta, Chairman
Monterey County Board of Supervisors
168 W. Alisal Street, Floor 1
Salinas, CA 93901

Re: City of Gonzales Comments on 2007 Monterey County General Plan Update

Dear Chairman Armenta and Members of the Board of Supervisors:

The City of Gonzales continues to follow the evolution of the County General Plan Update because our interest in the future of the County and because of the Update's potential effects upon the City of Gonzales. At several times during the County General Plan Update process the City has offered comments, most recently by letters on November 21, 2006 and December 4, 2006.

The City appreciates that the County has made various adjustments to certain plan policies along the lines that we previously requested. However, we believe that several parts of the plan text still warrant adjustment. Attached to this letter, and indicated by *italics*, are comments on specific policies that we recommend be modified. These are the same comments that the City made on these specific policies in the letter of November 21, 2006. The County policies of concern are included for reference. 1

Please accept our congratulations that the General Plan Update is nearing completion. We will appreciate your further considerations of our attached recommendations.

Sincerely,

Maria Orozco, Mayor

CITY OF GONZALES
BILL FARREL, AICP
DIRECTOR OF PLANNING & ECONOMIC DEVELOPMENT

P.O. BOX 647 * 147 FOURTH STREET
GONZALES, CALIFORNIA 93926
CITY HALL: (831) 675-5000
FAX: (831) 675-2644

Gonzales will continue to be a safe, clean, family-friendly community, diverse in heritage, and committed to working collaboratively to preserve and retain its small town charm

L-2

CITY COUNCIL
CITY OF GONZALES
COMMENTS ON SELECTED GENERAL PLAN UPDATE POLICIES
January 5, 2008

Policy LU-2.15 "Work with AMBAG and, cities to direct the majority of urban growth including higher density housing development into cities and their sphere of influence with an emphasis on redevelopment and infill."

Comment: *Gonzales is essentially built-out with only a handful of remaining vacant or under-utilized parcels, all of which are small and together cannot provide for more than about ten additional dwellings. These cannot make a dent in the level or residential demand projected for the area. Further, the City's ability to promote redevelopment of residential properties is almost non-existent, and has been made even more limited by recent case law. Any real response to growth pressures for residential, commercial, industrial and public uses will have to be through conversion of unincorporated agricultural properties general east of and outside the City's current boundaries.* 2

This proposed General Plan policy has the effect of forcing higher density development into the cities that already have relatively high density, while the county General Plan Update continues, to allow low-density, upscale housing in the outlying areas. It is important to keep in mind that the cities need some areas of relatively lower density, large lot residential development in order to encourage higher-end housing and a socio-economic balance and all the benefits that can bring to the life of the city. If the County wishes to retain this policy then it should conform to the same community development standards as the cities and the Plan should be amended to make that happen so that County development is also at higher densities.

Policy LU-2.19 The County shall critically review development proposals and general plan amendments within the cities to assure that the impacts of growth in the cities on the County's infrastructure are adequately quantified and fully mitigated."

Comment: *Projects upon which the County should comment are generally defined by the inter-governmental referral process defined in the government code. These, are generally new projects on the cities' edges. Mitigation requiremen[illegible]s are typically, established through CEQA compliance documents. We do not disagree that development within cities affects County infrastructure, but it is equally true that County development affects the infrastructure of the cities. The City of Gonzales is heavily impacted by traffic, especially heavy trucks that originate' in the County. The City provides the affordable housing that supports agricultural workers within the County and bears the related services costs. What is needed is an overall assessment of shared infrastructure impacts and a mutually acceptable program for mitigation. Short of that, the County could find the cities demanding mitigations of all kinds for County projects. This policy should be* 3

Gonzales will continue to be a safe, clean, family-friendly community, diverse in heritage, and committed to working collaboratively to preserve and retain its small town charm

L-2

deleted or revised to state that "The County will coordinate with the cities to evaluate developmentproposals both in the County and within the cities in order to discuss issues of mutual concern and to mitigate; where feasible impacts on respective infastructure". 3

Policies AG-2.1 through 2.3

AG-2.1 "Agricultural support facilities such as coolers, cold storage, warehouses, parking lots, greenhouses, temporary and permanent worker housing and offices, processing equipment and facilities, agricultural research facilities, loading docks, workshops established to serve on-site and/or off-site fanning and ranching activities shall be considered compatible and appropriate uses in the Farmlands, Permanent Grazing, and Rural Grazing land use designations. The County shall establish an ordinance that determines which uses require a discretionary permit."

AG-2.2 "The establishment and retention of a broad rangé of agricultural support businesses and services to enhance the full development potential of the agricultural industry in the County shall be encouraged and supported."

AG-2.3 "Agricultural processing facilities for products grown in and out of the County are compatible and appropriate land uses in the Farmlands, Permanent Grazing and Rural Grazing land use designations." 4

Comment: These policies are a major expansion of the range of uses allowed by the County in the past, and in essence allow gradual conversion of the Countys best agricultural lands into an agricultural industrial park. For many years the County's policy; which worked well, was to limit uses on agriculturally zoned property to those uses supporting agriculture on that site. The current draft Plan language is a major change in the County s former protective treatment of the agricultural areas. This new language will result in conversion of significant areas into inappropriate uses, and increase rural traffic and roadway safety problems that are already significant in several areas of the Salinas Valley. These policies encourage isolated work environments instead of putting workers within cities where they can be housed and enjoy services. These policies work against creating a good jobs housing balance within the cities and County.

Agricultural support and processing facilities are needed, but most of these facilities should be located within the designated agricultural industrial parks of the Salinas Valley cities, where infrastructure has been developed at considerable public expense. The encouragement ojthese uses outside the cities undermines the financial viability the established and traditional farm service centers. If the County wishes to allow a range of agricultural support uses on the farms, then these should be limited to the principal of allowing only those uses that must be located on the farm to function at all and that serve only that farm property. The City requests these policies be revised to direct future agricultural support and processing uses to established industrial parks in the incorporated cities. Uses allowed in the rural farming areas should be limited to those uses that are soils dependent or that cannot effectively unction except on the farm site and which serve only that farm site.

Gonzales will continue to be a safe, clean, family-friendly community, diverse in heritage, and committed to working collaboratively to preserve and retain its small town charm

L-3 7.2

KING CITY
CALIFORNIA

Monterey County
Planning and Building
Inspection Administration
FEB 02 2009
RECEIVED
read CEQA Comments
2/2/09 6:20pm

Sent Via E-mail and Certified Mail

January 29, 2009

Carl Holm, Assistant Director
County of Monterey
Planning Department
168 West Alisal, 2nd Floor
Salinas, CA 93901

Subject: Comments on 2007 Monterey County General Plan Draft Environmental Impact Report (September 2008) - County File # PLN070525

Dear Mr. Holm,

Thank you for the opportunity to comment on the 2007 Monterey County General Plan Draft Environmental Impact Report (DEIR). The purpose of this letter is to provide comments on the adequacy of the DEIR. The City of King's primary considerations pertain to impacts on agricultural lands and City-centered growth.

The following comments provide an overview of the policy and mitigation considerations that the City of King would like the County to address in the 2007 Monterey County General Plan and DEIR.

- Impact AG-1 (Loss of Important Farmland) states that 2,571 acres of Important Farmland will be removed from the agricultural land use designation through General Plan buildout. The DEIR should describe the type, amount, and location of farmland conversion resulting directly or indirectly from both project implementation and growth inducement. Feasible mitigation measures should be considered if implementation of the project will result in any conversion of Important Farmland. Consideration should be given to the purchase of agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land, as well as for the mitigation of growth inducing and cumulative impacts on agricultural land. Conservation easements can protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guidelines §15370. 1

- Impact AG-1 (Loss of Important Farmland) evaluates policies from the General Plan Agriculture Element that are intended to minimize adverse impacts on the conversion of Important Farmland to non-agricultural uses. However, the analysis does not acknowledge the inconsistency between the city-centered growth concept supported by the General Plan and Policies AG-2.1 and AG-2.3. These policies promote the development of agricultural support and processing facilities in the unincorporated area on lands designated as Farmland, Permanent Grazing and Rural Grazing. The General Plan is overly vague in its definition of agricultural support facilities: 2

  AGRICULTURAL SUPPORT FACILITY means the use of a structure, land or land and structure principally established to support on-site and/or off-site farming or

L-3

ranching activities including but not limited to coolers, cold storage, loading docks, and workshops.

While the City of King strongly supports the agricultural industry, Policies AG-2.1 and AG-2.3 could lead to the development of a more industrial character in the unincorporated areas of the County, rather than preserve the rural environment and Important Farmland. To be consistent with the city-centered growth concept, the County should include mitigation measures or General Plan programs to direct these industrial facilities to more appropriate areas within the incorporated cities and close to infrastructure and housing. 2

- Impact AG-2 (Agricultural Use Zoning and Williamson Act Contracts) discusses potential conflicts between the 2007 General Plan and agriculturally zoned land or land under a Williamson Act contracts. However the discussion does not adequately address the CEQA threshold - *conflict with existing zoning for agricultural use or a Williamson Act contract*. The discussion should be expanded to address and mitigate the following issues: 3
    - Additional impacts the project may have on lands under Williamson Act contract such as potential contract cancellations or nonrenewals.
    - Whether the project may result in zoning precluding agricultural use in agricultural preserve areas as defined in the Williamson Act (Government Code § 51230).
    - Impacts on current and future agricultural operations, land-use conflicts, and potential increases in property values and taxes from project implementation.

Thank you again for the opportunity to comment on the DEIR. The staff contact in this office is Maricruz Aguilar, Assistant Planner. Please contact her as needed with any questions (831) 386-5916.

Sincerely,

Michael Powers
City Manager

cc: City Manager
City Council
Community Development Department
City Clerk

212 S. VANDERHURST AVENUE • KING CITY, CA 93930
PHONE: (831) 385-3281 • FAX: (831) 385-6887
WWW.KINGCITY.COM

L-3

Calderon, Vanessa A. x5186

From: Maricruz Aguilar [maguilar@kingcity.com]
Sent: Monday, February 02, 2009 6:20 PM
To: ceqacomments
Subject: City of King Comment Letter - County GP DEIR

To Whom It May Concern:

I am attaching an electronic copy of the City of King's comments regarding the Monterey County's General Plan Draft EIR. Please feel free to contact me if you have any questions.

Original will follow.

Thank you,

Maricruz Aguilar, Assistant Planner

02/03/2009

L-4

City of Marina
211 HILLCREST AVENUE
MARINA, CALIFORNIA 93933
831-884-1278 fax 831-384-9148
www.ci.marina.ca.us

October 27, 2008

Carl Holm, Planning Manager
Monterey County Planning Department
168 Alisal Street, 2nd floor
Salinas, California 93901

RE: CITY OF MARINA COMMENTS ON THE MONTEREY COUNTY GENERAL PLAN DRAFT EIR

Dear Mr. Holm,

On October 21, 2008, the City Council held a duly noticed public meeting to discuss and consider the Monterey County General Plan Draft Environmental Impact Report (Draft EIR) as it pertains to the City of Marina. At the meeting, the City Council adopted Resolution No. 2008-213 memorializing their response to the County. This letter forwards the City Council's comments.

1. County Draft General Plan, Conservation and Open Space Element

   While the draft General Plan does include policy GMP-3.2 to limit the visual impact of new development on canyon edges and hilltops and while the County did add a policy to prohibit development on slopes greater than 30 percent, there is still no specific language to preserve hill tops and bluff tops as permanent open space that can be enjoyed by many future generations.

   The City believes that the existing, un-developed hill tops and buff tops within the County, and in particular within the Greater Monterey Peninsula Area Plan, deserve to be protected and preserved. The City believes that any development at the top of these hills and bluffs is a significant impact and that the only acceptable mitigation is to prohibit their development. Such impact and mitigation should be addressed in the EIR. 1

2. County Draft General Plan and Draft EIR, Circulation Element, Intersection Level of Service

   The County draft General Plan and Draft EIR continue to set a Level of Service D as the impact threshold for County intersections. 2

L-4

The City believes that the County should set a minimum Level of Service C for major County intersections to limit impacts to local jurisdictions, since approximately 75 percent of the County's residents are located within city boundaries. A Level of Service C should be addressed in the EIR. 2

3. County Draft General Plan, Public Services Element, Fair Share of Impact Fees

   The County has not added language to the draft General Plan to emphasize that new residential development located adjacent to the City of Marina should seek annexation to the City to relieve the impact on City services by paying their fair share of impact fees.

   The City believes that new development within the County, but adjacent to local jurisdictions, will greatly impact those jurisdictions, because it is within the local jurisdiction that most of the public services are concentrated. For example, if a Marina fire station is the closest fire station to an emergency in adjacent County land, Marina will respond and likewise for police services. These types of public service impacts from new, adjacent development to local jurisdictions should be addressed in the EIR. 3

4. Draft EIR, Table 4.11-1, Sheriff's Station Summary

   The Draft EIR includes a table that summarizes the service areas for the Central, Coastal, and South County regional stations. The City suggests listing the Royal Oaks area as a neighborhood that is also serviced by the Central sheriff's station. 4

5. Draft EIR, Page 4.11-16, Safety Element Policies

   The City recommends revising the last paragraph to provide more detail regarding the types of resources needed in an emergency situation, as follows:

   > "As stated in Impact 1, Safety Element Policies S-6.1 through S-6.8 set forth emergency preparedness policies to ensure that the Sheriff's Office would have adequate resources to meet the demands of the 2030 population. Policies S-6.1 through S-6.8 would decrease impact on sheriff stations by ensuring that stations have the adequate resources in an emergency situation, which include emergency centers, **resources, personnel, and equipment,** information on the levels of emergency provided and prohibiting development in areas that cannot be reached by emergency vehicles." 5

L-4

October 27, 2008
RE: City of Marina Comments on the Monterey County General Plan Draft EIR *Page 3*

6. Draft EIR, Page 4.11-17, Significance Determination

The City suggests strengthening the third to last paragraph to emphasize that there are currently unincorporated areas that are already underserved, as follows:

> "There are no plans at the current time that describe the design, location, or operational characteristics of future facilities. Therefore, their environmental impacts cannot be determined with any certainty and are examined at only a general level of detail. New facilities and services would serve the Community Areas and Rural Centers (where demand is expected to be greatest) and likely would be located in those areas. Their impacts would be an indistinguishable part of the impacts of the community as a whole. These facilities are typically low-key. For example, traffic is generally insubstantial because it is spread throughout the day. Noise is similarly low because of the limited number of employees and because sirens are seldom, if ever used when vehicles leave the premises (unlike a fire station). **Regardless, these facilities must be geographically located in those unincorporated areas that historically have been underserved and have the highest concentration of population and crime.**"

6

In summary, the City of Marina appreciates the efforts by the County to address the concerns of our community as you move forward with your General Plan adoption. However, we believe that the above concerns are critical to Marina's future. Thank you for the opportunity to comment.

Sincerely,

Anthony J. Altfield
City Manager

CDD:S:/Planning/Monterey County/MoCoDEIR/2008/City comment letter on County DEIR – October 22, 2008

L-5

City of Salinas

OFFICE OF THE CITY MANAGER
200 Lincoln Avenue Salinas, California 93901 (831) 758-7201 Fax (831) 758-7368

January 8, 2009

Monterey Co. [illegible] Planning and Inspection Commission

Carl Holm, Assistant Planning Director
County of Monterey RMA
Planning Department
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

SUBJECT: **2007 GENERAL PLAN AND DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT**

Dear Mr. Holm:

The City of Salinas submits the following comments on the County of Monterey's 2007 General Plan and Draft Program Environmental Impact Report. Many of the City's comments have been previously submitted in response to the 2006, version of the General Plan Update. These concerns remain applicable where similar policies exist. Copies of the City's prior correspondence dated October 6, 2006 and September 25, 2007 are attached.

Land Use

Greater Salinas Area Plan Policies GS-1.1 through GS-1.12 identify multiple Special Treatment Areas (STAs) and Study Areas (SAs), including Butterfly Village, Spence/Potter/Encinal Road and Highway 68/Foster Road among others. These STAs and SAs are intended to establish standards to guide development at those locations. In some cases, this is accomplished quite effectively. For example, GS 1.4 stipulates that development would only be allowed under specific conditions, within the identified land use boundaries shown in the Area Plan. In other areas, discussed further below, the Greater Salinas Area Plan does not establish clear guidelines for orderly development or does so in a manner that is inconsistent with the Greater Salinas Area Memorandum of Understanding (GSA-MOU).

1

As you know, the Greater Salinas Area Memorandum of Understanding (GSA-MOU) was adopted at a historic joint session of the Monterey County Board of Supervisors and Salinas City Council on August 29, 2006.

Some of the key elements of the GSA-MOU (excerpted and paraphrased below) were:

- City growth to the North and East, except as provided in the agreement;
- County support for the City's Future Growth Area annexation proposal to LAFCO;

L-5

Carl Holm
2007 Monterey County General Plan
January 6, 2009

County support for the City's Fresh Express and Uni-Kool annexation proposals, subject to appropriate environmental review, and subject to appropriate agricultural conservation easements;

- Agricultural easements to the west and south;
- Consultation with the City in the planning process for any development in the Greater Salinas Planning Area;
- No development by County contiguous to the City limits if those proposals require either or both a General Plan amendment or a rezoning. Proposals requiring such changes shall be referred to the City for consideration and possible annexation;
- City and County support for regional transportation system (TAMC);
- County development of a County-wide Traffic Impact Fee within 18 months of the adoption of the County General Plan;
- City and County cooperation regarding the alignment of the future Westside Bypass which shall establish a development boundary for the City;
- Development in area west of Davis Road and east of the future Westside 'Bypass, excluding the Boronda Redevelopment Area, shall be limited to expansion of City's retail sales capacity and shall take place after annexation;
- City and County to work cooperatively to address impacts on the Reclamation Ditch Watershed Area, recognizing that a comprehensive financing program is needed. County to complete a nexus study and hearing process, within 36 months of adoption of the GSA-MOU [August 29, 2009].

1

Our review of the 2007 General Plan and Draft Program EIR has focused first and foremost on an analysis of consistency with the GSA-MOU. The City of Salinas is pleased to see that the Land Use Map for the Greater Salinas Area has been amended to restore an Agricultural land use designation to those lands previously considered in the prior versions of the Rancho San Juan Specific Plan (pre Butterfly Village). The exception being those existing developed commercial parcels adjacent Highway 101 at the northerly entrance to the City. As we have mentioned in our informal monthly City – County staff meetings, it would be appropriate to designate that area northeasterly of the City as a Special Study Area (SA) subject to specific planning requirements and its potential annexation into the City of Salinas.

The City maintains its advocacy of city-centered growth and was therefore, concerned to see an acknowledgement of the potential for the development of general commercial uses in the vicinity of the Salinas River and Highway 68.

The City appreciates the agricultural-tourism nature of *"The Farm,"* as addressed in Policy GS-

2

L-5

Carl Holm
2007 Monterey County General Plan
January 6, 2009

1.3, however, the addition of general commercial uses as contemplated by Policy GS-1.5, or any commercial uses other than row-crop agriculture along this agricultural, scenic corridor would not be appropriate.

The City of Salinas has been diligent in its adherence to maintaining a distinct urban boundary. Unfortunately, that distinction is often blurred by commercial ventures at important gateways into the City. Of particular note is the cluster of heavy commercial, storage and even a mobile home park at the northerly entrance to the City as viewed from US 101. We fear that similar conditions are evolving along Highway 68 just south of Salinas as a series of metal buildings, ostensibly "fruit stands" are being developed. The aforementioned Policy GS-1.5 affirms the City's concern in this regard.

The City also questions Policy GS-1.6 addressing the potential development of commercial uses on commercially designated parcels between Harrison Road and Highway 101 to the north of the City. It is the City's position that any commercial development along this city gateway should be limited to only the redevelopment of those properties containing existing development. Additional development is inherently in conflict with the idea of city-centered growth and in conflict with the spirit of the Greater Salinas Area Memorandum of Understanding. Absent further consultation with the City, any undeveloped properties between Harrison Road and Highway 101 should be designated and limited to agricultural farmland use.

1

If not limited to row crop production, as a gateway into the City of Salinas (if not annexed into the City of Salinas), at minimum the properties should be developed to a very high architectural standard.

Policy GS-1.11 establishing a study area for Espinosa Road suggests the intention of the introduction of industrial uses in this location. Consideration of a General Plan policy and the establishment of a Special Study Area would is not an appropriate solution to a code enforcement concern. The introduction of industrial uses in this location - in near proximity to the City of Salinas is in conflict with the principles of city-centered growth and again in conflict with the Greater Salinas Area Memorandum of Understanding.

The City of Salinas is also concerned regarding Policy GS-6.2 permitting the development of coolers, cold rooms, loading docks and farm equipment shops on agriculturally designated land. These are industrial activities and as such should be located in an appropriate industrially designated, city-centered location.

Circulation

The discussion regarding the public transportation services provided by Monterey-Salinas Transit fails to mention the service provided to South County.

2

The City is pleased to see that the Capital Improvement and Financing Plan (CIFP) are to be completed within the 18 month period established by the Greater Salinas Area Memorandum of Understanding (GSA-MOU). It is interesting that the County has determined that Level of

3

L-5

Carl Holm
2007 Monterey County General Plan
January 6, 2009

Service (LOS) D is being proposed as a County standard. LOS D is more typically an urban rather than rural standard. LOS D may be appropriate in designated Community Areas; however as an overall standard for the County, it may condone traffic congestion in rural locations where traffic problems are typically not anticipated. Regrettably, the electorate did not see the ultimate value in Measure Z (the ½ cent sales tax initiative to address region and local serving roads) which makes it all the more imperative that the County of Monterey along with other regional entities adopt timely transportation congestion/safety policies. 2

Conservation and Open Space

The City of Salinas questions Policy OS-1.1 encouraging the establishment *voluntary* restrictions to the development potential of property located in designated visually sensitive areas. Monterey County is visually stunning. Areas which are deemed to be visually sensitive should have development regulations and public review processes established to ensure that Policies OS-1.2 through OS-1.9 remain viable.

Regarding Policy OS-3.7 encouraging *the voluntary preparation of a coordinated resources management plan in watersheds of State designated impaired waterways;* the City of Salinas encourages the County of Monterey to require the preparation of stormwater management and control plans meeting the requirements as imposed on the City by the state Central Coast Regional Water Quality Control Board. This is particularly relevant to those properties within the Zone 9 watershed area as defined by the Monterey County Water Resources Agency. 3

Safety

Safety policy S-2.3 provides for an exemption to the guidelines established by FEMA and the National Flood Insurance Programs as well as ordinances enacted by the Monterey County Board of Supervisors for grading activities carried out in the course of routine agricultural operations. It has been the City of Salinas' experience that the greatest contributor to the siltation of the creeks and their tributaries flowing through the City is a result of upstream agricultural grading practices. The City of Salinas recommends an agricultural grading policy that would result in the detention/retention of storm and irrigation water on-site. Table PS-1 indicates that agricultural lands result in no net increase in harmful run-off. This statement is contrary to the herbicide and pesticide measurements that have been collected in the stream corridors flowing through the City as a result of upstream agricultural operations. Drainage and agricultural management and mitigation monitoring plans should be required for run-off into the regional watershed. 4

Agriculture

The 2007 General Plan update anticipates the conversion of approximately 2,571 acres of Important Farmland to non-agricultural uses. Although the Draft Environmental Impact Report (DEIR) states that no mitigation beyond the 2007 General Plan policies is feasible, the City was pleased to see the commitment to the preparation, adoption and implementation of a program to mitigate for the loss of that farmland in Policy AG-1.2. The City of Salinas recommends that the 5

4

L-5

Carl Holm
2007 Monterey County General Plan
January 6, 2009

County of Monterey consider the Agricultural Land Preservation Program established in consultation with the County of Monterey as a potential regional model [Resolution No. 19422 (NCS)] for the loss of important farmland. 5

Water Resource Management

The Water Resources section of the Draft Environmental Impact Report for the 2007 Monterey County General Plan update commendably addresses many of the hydrologic conditions throughout the County of Monterey. However, with the attention that the community has given Can Lake, and with the concerns expressed by the Monterey County Water Resources Agency, the City was surprised to note that Section 4.3 Water Resources did not address this significant natural stormwater management facility along with the accompanying 1907 Reclamation Ditch that was created to enable the cultivation of this watershed feature.

It is vital that the County implement Paragraph #13 of the GSA-MOU and work in good faith with the City and other interested parties to complete its comprehensive financing program for the Reclamation Ditch, including finalization of the nexus study and hearing process.

The City did note the reference to existing storm drain systems and the potential that they may be insufficient to accommodate future "Special Treatment Areas" outside of the city-limits. The properties within these "Special Treatment Areas" must be included in the solution to address the deficiencies identified by the Monterey County Water Resources Agency.

The Reclamation Ditch is a man made feature connecting the regions natural watercourses: Gabilan and Natividad Creeks and Alisal and Tembledero Sloughs. As these natural and man-made riparian and drainage features are improved the City of Salinas encourages the County to establish policies that would establish a recreation trail extending from the foothills of the Gabilan Mountains to the beach at Moss Landing for the benefit of all our respective residents. 6

The City of Salinas appreciates that the County of Monterey has had many challenges throughout its lengthy General Plan Update process. The City also acknowledges that the adoption of the GPU initiates the requirement to bring all of the County's land use, zoning and development policies into conformance with the General Plan. In this regard, the City of Salinas urges the County of Monterey to limit the permissive and conditionally permissive land uses and development that may be considered in Agriculturally designated lands which surround the cities of the Salinas Valley to maintain the distinct urban/rural boundaries that contribute so significantly to the beauty and bounty of this region.

5

L-5

Carl Holm
2007 Monterey County General Plan
January 6, 2009

The City is grateful for the progress that that been made and hopes that its comments assist in improving the document and ensuring that mitigation measures are consistent with the GSA-MOU.

Respectfully submitted,

CITY OF"SALINAS

ARTIE FIELDS
City Manager

Enclosures

Correspondence dated October 6, 2006 and September 25, 2007
Resolution No. 19422 establishing an Agricultural Land Preservation Program

cc: Mayor and Salinas City Council
Monterey County Board of Supervisors
City Attorney
Deputy City Manager / City Engineer

6

L-5

City of Salinas

OFFICE OF THE CITY MANAGER
200 Lincoln Avenue Salinas, California 93901 (831) 758-7201 Fax (831) 758-7368

September 25, 2007

BY HAND DELIVERY

Chairman Dave Potter
Vice-Chair Fernando Armenta and Members of the
Monterey County Board of Supervisors
168 West Alisal St., 1st Floor
Salinas, CA 93901

Re: City of Salinas Comments re Planning Commission Recommendations for GPU-5

Dear Chairman Potter and Members of the Board:

Please accept these comments on behalf of the City of Salinas concerning the recommendations by the Planning Commission and the Planning Commission Ad Hoc Subcommittee for GPU-5. The City commends the County's efforts to arrive at a comprehensive and credible compromise General Plan update document.

The City's primary considerations pertain to policies in support of City-Centered Growth, and development in the Greater Salinas Area. The Greater Salinas Area Memorandum of Understanding (GSA-MOU), approved by the Monterey County Board of Supervisors and the Salinas City Council on August 29, 2006 (attached as Exhibit A) establishes a framework of guiding principles to ensure orderly and appropriate development for the Greater Salinas area. 7

This is consistent with our previous communications to the County, most recently in October 2006 (copy of letter attached as Exhibit B).

It is critical to the City of Salinas that GPU-5 be consistent with the GSA-MOU and that the GSA-MOU be distributed and reviewed as part of the regular planning and environmental review process for any project or development in the Greater Salinas Area of Monterey County. Specific comments pertaining to the Planning Commission recommendation are as follows:

- Rancho San Juan: The City positively considers the deletion of Rancho San Juan/ Butterfly Village as a "Community Area" in GPU-5. 8
- Development in the Greater Salinas Area: The City notes that under the GSA-MOU, the City and County agreed that "developments within the area designated by the County General Plan as the Greater Salinas Planning Area shall only occur after consultation with the City in the planning process." (GSA-MOU, Paragraph 6 (emphasis added)) 9

[redacted]

L-5

- Community Areas generally: Community Area policies that establish designated areas for urban uses are not generally consistent with basic and widely accepted "smart growth" principles which are city-centered and take advantage of existing urban infrastructure, transit and public and emergency services. Any development within designated "Community Areas" (including redevelopment areas) should not proceed prior to the adoption of a Community Plan or Specific Plan. 10

- Boronda: With respect to the designation of Boronda as a "Community Area", the City notes that any development in the undeveloped southern portion of the Boronda Redevelopment area must be consistent with Paragraph 14-15 of the GSA-MOU. 11

- Affordable Housing Overlays: The City notes that under the GSA-MOU, the City and County agreed "to support each other's efforts to construct affordable housing throughout the Countynecessary to achieve the Fair Share Housing Allocation as approved by the Association of Monterey Bay Area Governments (AMBAG)." (GSA-MOU, Paragraph 16 (emphasis added)) The City commends the County's efforts to promote affordable housing throughout the County. 12

- Traffic. In addition to the Planning Commission's recommendation that the Board require the adoption of a concept-level Capital Improvement Financing Plan (CIFP), the City notes that the GSA-MOU also requires the County "to develop a County-wide Traffic Impact fee program for the improvement of major County roads in accordance with the County's adopted General Plan." (GSA-MOU, Paragraph 10.) Also, please note our previous concerns with the traffic modeling assumptions prepared for the 2006 General Plan Draft Program Environmental Impact Report. 13

Annexations: The City and County have also agreed "to work cooperatively and expeditiously in annexation matters consistent with this agreement." (GSA-MOU, Paragraph 8.) 14

These comments are not intended to be exclusive and merely highlight some of the provisions of the GSA-MOU that have application to GPU-5.

The City is available and welcomes the opportunity meet and consult with County staff concerning any of these comments.

Thank you for your consideration.

Sincerely,

DAVE MORA
City Manager

[redacted]

L-5

Enclosures:
Exhibit A -- City of Salinas Letter to Mike Novo dated October 6, 2006
Exhibit B -- GSA-MOU

cc: Mayor and City Council (without enclosures)
Vanessa Vallarta, City Attorney (w/ enclosures)
Robert C. Russell, PE, Deputy City Manager/City Engineer (w/o enclosures)
Jorge Rifa, Deputy City Manager (w/o enclosures)
Mike Novo, Monterey County Planning Department (w/ enclosures)
Wayne Tanda, Resource Management Agency (w/ enclosures)
Charles, McKee, County Counsel (w/ enclosures)

[redacted]

L-5

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

Preface

The negotiated terms of the Greater Salinas Area Memorandum of Understanding (MOU) will replace the previous Boronda Memorandum of Understanding between the City of Salinas and the County of Monterey and shall be adopted only after a joint public meeting of the Monterey County Board of Supervisors and the Salinas City Council. In the event of a successful challenge to any provision of this MOU by a third party, such provision shall be removed from the Greater Salinas Area MOU.

This Memorandum of Understanding (MOU), by and between the County of Monterey (County) and the City of Salinas (City), is to set forth certain agreements between the parties to express their intent to jointly pursue action to assure orderly and appropriate land use development in the area designated in the General Plan of Monterey County as the Greater Salinas Area Plan area and in the City of Salinas. Specific objectives to be achieved through the implementation of the land use and associated policies included in this MOU are the preservation of certain agriculture land, the provision of future growth areas, and the provision of adequate financing for the services and facilities of benefit to the residents of the Greater Salinas Area Plan area and the City. It is recognized that, with respect to some of the provisions set forth herein, numerous actions must be taken pursuant to State and local laws and regulations before such policies can be implemented. Such actions include, in some instances; the need to comply with the California Environmental Quality Act (CEQA), the need, to hold public hearings and/or otherwise seek public input before reaching binding decisions, and the need to obtain approvals from other agencies such as the Local Agency Formation Commission (LAFCO). For all such provisions, this MOU shall be understood to constitute tentative policy commitments that can only become fully binding after all such legal prerequisites have been satisfied. Even so, both parties agree to make a good faith effort to follow and implement the provisions of this MOU subject to the foregoing.

The City and County do hereby mutually agree to the following:

City Growth

1. City and County agree that the future growth direction of the City shall be to the north and east of the current City limits, except as otherwise provided for in this MOU.

2. County supports the City's 2005 Preliminary Sphere of Influence/Annexation Proposal to LAFCO to the north and east of the City's existing City Limits (Exhibit

3. County supports the City's 2005 Preliminary Sphere of Influence/Annexation Proposal to LAFCO to the south of the City's existing City Limits (Exhibit A) for the exclusive purpose of agricultural processing and processing capacity (Fresh Express). County further supports future City Sphere of Influence./ Annexation proposals to the

L-5

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

south of the City's existing City Limit for the exclusive purpose of agricultural processing and processing capacity (Unikool), subject to the establishment of appropriate agricultural conservation easements.

4. City and County agree to the creation and maintenance of agricultural conservation easements in the unincorporated areas to the west and south of the City's Sphere of Influence insofar as the easements are consistent with the adopted General Plans of the two jurisdictions.

5. City and County agree to work cooperatively and in concert with the affected property owners to annex developed unincorporated areas (e.g. Bolsa Knolls) adjacent to or within the City's Sphere of Influence as shown in Exhibit A and to transfer existing County sanitation facilities (e.g. Boronda) upon future City annexation that support these areas subject to the property owners paying any required sanitation system connection fees established by MRWPCA. It is anticipated that an initial effort consistent with this annexation commitment shall be cooperation by all parties to consider and facilitate the proposed Chapin Rogge Road annexation application insofar as the annexation is consistent with the provisions of LAFCO.

6. City and County agree that developments within the City's 2005 Preliminary Sphere of Influence/Annexation Proposal shall only occur after annexation to the City and that the City shall consult with the County in the planning process. City and County also agree that the developments within the area designated by the County General Plan as the Greater Salinas Planning Area shall only occur after consultation with the City in the planning process.

7. City and County agree that the County shall not process any proposals for development in areas contiguous (immediately adjacent) to the City's City Limit / • if those proposals would require either or both a County General Plan amendment or a rezoning. Proposals for development requiring a General Plan amendment or a rezoning shall be referred to the City for consideration and possible annexation to the City.

8. City and County agree to work cooperatively and expeditiously in annexation matters consistent with this agreement

9. City and County agree to support fees and taxes needed to mitigate the collective impact of new and existing development on the regional transportation system to the extent that the fees and taxes reflect the overall financing program adopted by TAMC.

10. City and County agree that County will develop a County-wide Traffic Impact fee program for the improvement of major County roads in accordance with the County's adopted General Plan. The County fee program will be developed in consultation with TAMC and Monterey County cities. It is recognized that there

Page . ors

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

will be development within the City of Salinas related to the anticipated annexation of land to the north and east of the existing City Limits, and it is the desire of both jurisdictions that the County not rely upon the imposition of an ad hoc traffic fee on City development. Therefore the development of the Traffic Impact Fee for the Salinas *Area, as shown* in Exhibit R, will be a priority and a nexus study and hearing process should be completed within 18 months of adoption of the 2006 County General Plan. The County Traffic Impact Fee will be imposed on development in affected cities and unincorporated areas.

11. City and County agree to work cooperatively on establishing the alignment, phasing and financing of the regional roadway facility commonly referred to as the Westside Bypass and will expedite the completion of a Project Study Report for this future roadway. City and County agree that the ultimate alignment of the future Westside Bypass shall establish the development boundary for the City. It is the intent of both parties to minimize the impact on agricultural land in establishing the Westside Bypass alignment so that the ultimate alignment shall not result in the development of acres of agricultural land in excess of that anticipated in the Westside Bypass alignment as shown in the City of Salinas 2002 adopted General Plan (Exhibit C).

12. City and County agree that future development between the area west of Davis Road and east of the future Westside Bypass, excluding the Boronda Redevelopment Project area, shall be limited to expansion of the City' retail sales capacity and shall take place after annexation.

13. City and County agree to. work cooperatively to address the collective impact of current and anticipated land uses in the Reclamation Ditch Watershed Area. There is a recognition that a comprehensive financing program is needed that includes grants, benefit assessments, appropriate development impact fees, and special taxes required w tddress current and anticipated impacts. The County, in consultation with the City, should complete a nexus study and hearing process, assessing benefit of current and existing land uses, within 36 months of adoption of this MOU. The adopted impact fee will be imposed on current and existing land uses in both the City and unincorporated areas.

Boronda Redevelopment Project Area

14. City and County agree that in the undeveloped southern portion of the Boronda Redevelopment Project Area (Exhibit D) the County shall take the lead in the planning, review, and approval process subject to concurrent City review so that the final approved project is consistent with existing City development standards. City recognizes the County's desire and intent to assure development that is consistent with commitments made to the Boronda community regarding required amendments to the current adopted Boronda Community Plan and that the anticipated development is assumed to provide financial benefit-0.e. tax increment) to the Boronda Development Area. City and County will work

[redacted]

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

cooperatively *to assure* that those commitments will result from and through the final approvals for development and annexation to the City of Salinas. City and County further agree that there will be no final development approvals prior to the completion of all requirements (including final LAFCO approval) for annexation of the subject area to the City of Salinas.

City and County agree that infill development in the northern portion *of the* Boronda Redevelopment Project Area (Exhibit D) Will continue to be processed by the County subject to consultation with the City.

15. City and County agree that property tax generated within the Boronda Redevelopment Area shall continue to accrue to the Boronda Redevelopment Area *for* implementation of the current (January 1, 2006) adopted Redevelopment Area Plan. Upon completion of the aforementioned Plan, the former Redevelopment Property Tax increment shall be allocated between the City and the County on a 50/50 basis.

Affordable Housing

16. City and County agree to support each other's efforts to construct affordable housing throughout the County necessary to achieve the Fair Share Housing Allocation as approved by the Association of Monterey Bay Area Government (AMBAG).

17. City and County agree that if the 100% affordable housing project on Rogge Road approved by the County in 2006 is annexed to the City that the project shall be credited to the County's Fair Share Housing Allocation.

Other

18. City and County mutually agree that neither will pursue future development related litigation against the other insofar as the subject development is consistent with this agreement.

CITY OF SALINAS	COUNTY OF MONTEREY
A municipal corporation of the State of California	A political subdivision of the State of California
By:	By:
Anna Caballero, Mayor	Jerry Smith
Dated: [redacted]	Chairman of the Board of Supervisors
	Dated: [redacted]

[redacted]

L-5

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

ATTESTED TO:

City Clerk

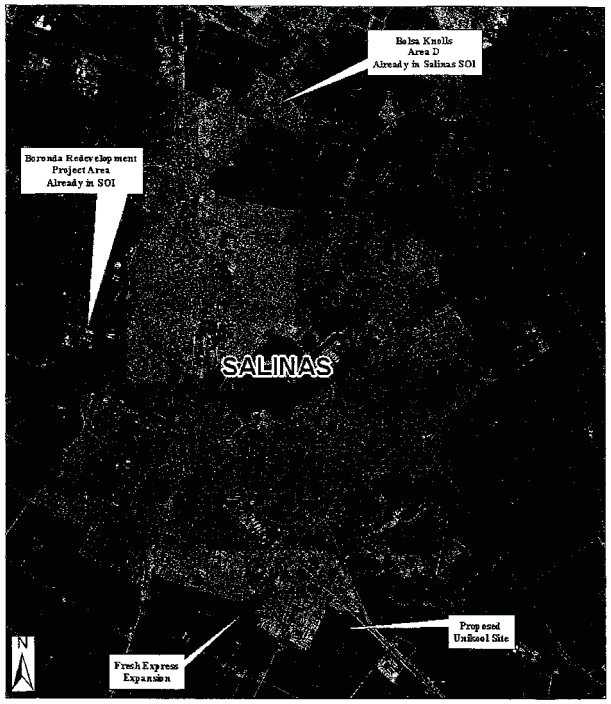
County Clerk

Page M5

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-5



'EXHIBIT A

Salinas 2005 Preliminary Sphere of Influence (SOn!
Annexation Proposal Map

L-5

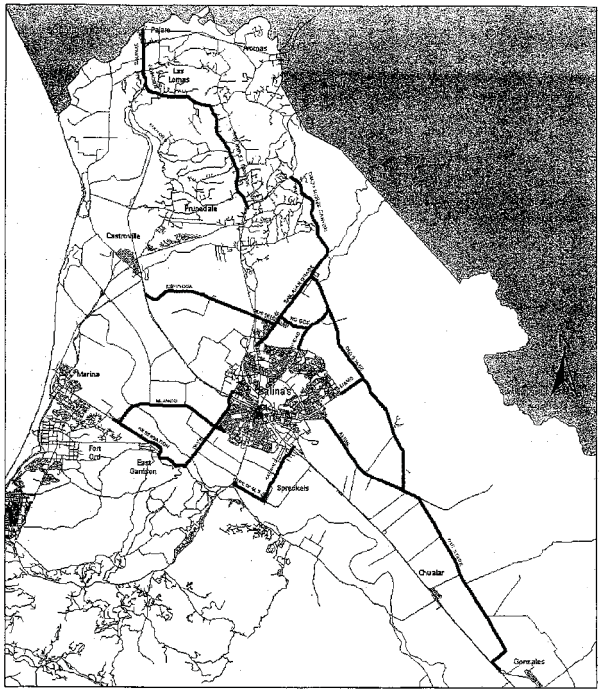


EXHIBIT B

Salinas Area Traffic Impact Fee
Affected Major County Roads

[redacted]

L-5

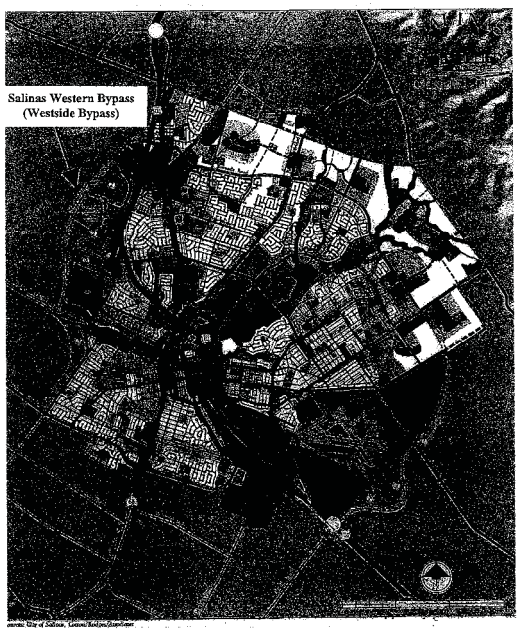


EXHIBIT C

Westside Bypass Alignment
City Salinas 2002 General Plan

[redacted]

L-5

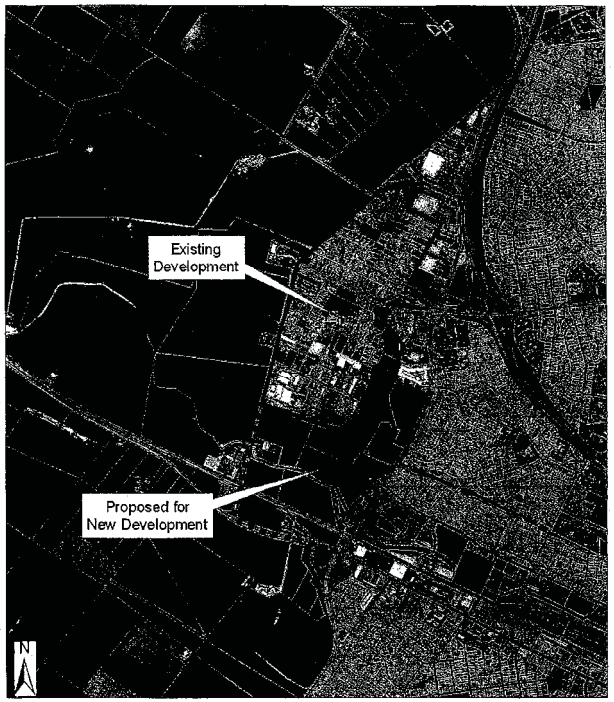


EXHIBIT D

North Boronda Redevelopment Project Area
South Boronda Redevelopment Project Area

[redacted]

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-5

City of Salinas

OFFICE OF THE CITY MANAGER
200 Lincoln Avenue Salinas, California 93901 (831) 758-7201 Fax (831) 758-7368

October 6, 2006

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

SUBJECT: 2006 MONTEREY COUNTY GENERAL PLAN AND GENERAL PLAN EIR

Dear Mr. Novo:

The August 15, 2006 Monterey County staff presentation to the Salinas City Council was beneficial and assisted the City Council to identify areas of importance to the City of Salinas and its residents. The City's primary considerations pertain to policies in support of City Centered Growth and the Greater Salinas Area. It is acknowledged that the Greater Salinas Area Memorandum of Understanding (GSA-MOU), approved by the Monterey County Board of Supervisors and the Salinas City Council on August 29, 2006 (copy attached) establishes a framework of guiding principles to ensure orderly and appropriate development for the Greater Salinas area.

The following comments provide an overview of the policy considerations that the City of Salinas would like the County of Monterey to address in the 2006 Monterey County General Plan (2006 GPU). In general, the City of Salinas expects the adopted County General Plan to be consistent with the GSA-MOU.

City Centered Growth

- Policies LU-2.1—LU-2.4 should cross reference City Centered Growth policies LU-2.15-2.19.
- Policy 2.15 does not acknowledge the sovereignty of local jurisdictions and reads as if it was a policy for other jurisdictions to implement. As such, an appropriate revision to this policy would be ***encourage*** rather than emphasize redevelopment and infill. Development proposals that are contiguous to current or planned city limits • should be directed to the respective city for annexation and development.
- Policy LU-2.17a. should be expanded to direct, to the greatest extent possible, development to the existing incorporated cities within the Salinas Valley ***in accordance with the jurisdiction's adopted General Plan.***
- Policy LU-2.17b. is overly broad. Establishing a "demonstrable benefit to the residents of the County as a whole" is quite vague and bears no relationship to the findings that LAFCO must establish for the determination of a jurisdiction's sphere of influence. The

15

EXHIBI

[redacted]

L-5

Mike Novo
October 6, 2006
Page 2 of 6

City recommends that this policy be deleted.

- Policy LU-2.18, *"The County shall critically review development proposals and general plan amendments within cities to assure that the impacts of growth in cities on the County's infrastructure are adequately quantified and fully mitigated* is expressed in an overbearing manner and does not reflect the spirit of cooperation embodied in the GSAMOU. It is recommended that this policy be either deleted or restated to indicate that the County will coordinate with cities to cooperatively evaluate development proposals both in the County and within the cities to discuss issues of mutual concern , and to mitigate, when feasible, impacts on infrastructure.

- Community Area Policies LU-2.20-2.27 establishing designated areas for urban uses is contrary to the fundamental principle of City Centered Growth.

- Policy LU-2.25 should be revised to prohibit development within designated Community Areas (including redevelopment areas) prior to the adoption of a Community Plan or Specific Plan.

- Agricultural Policies AG-2.1 and AG-23 pr 1 the development of agricultural support and processing facilities in the unincorporated area on lands designated as Farmland, Permanent Grazing and Rural Grazing. These policies are contrary to City Centered Growth. These policies allow for the conversion of prime agricultural lands into industrial business parks. Agricultural support and processing facilities are a critical component of the regional economy, however, these industrial facilities are most appropriately located in the incorporated cities where infrastructure has been developed and where the workforce resides. 15

Circulation

The discussion regarding public transit services should be expanded to address MST's service to South County.

- Policy C-1.1 implies that Levels of Service (LOS) may be reduced through a Community Plan. This policy should be reconsidered. If LOS cannot be maintained at the appropriate standard, the approving authority may make findings of overriding consideration in conjunction with its consideration of the environmental impact report for the Community Plan.

Policy C-1.8 is similar to Policy LU-2.18 discussed above. The City recommends that the policy be revised to indicate that the County will coordinate with cities to cooperatively evaluate development proposals both in the County and within the cities to discuss issues of mutual concern and to mitigate, when feasible, impacts on the circulation system.

[redacted]

L-5

Mike Novo
October 6, 2006
Page 3 of 6

- Policy C-4.3 implies that agricultural uses take precedence over all other uses – the development of an efficient circulation system is a benefit for all including agricultural users. All public rights of way should include appropriate provisions for drainage and utilities; however, agricultural drainage should not be a part of the public infrastructure.

- Policies C-5.1-C-5.6 support scenic roads and highways. As such, all of the County's roads and highways should be considered scenic. Monterey County and its incorporated cities rely on the quality of the landscape to support its principal economic activities: agriculture and tourism. This also supports Policy LU-1.12 that discourages off site advertising. The City of Salinas has prohibited the erection of new billboards and off premise advertising structures for many years and recommends that Monterey County also consider such a prohibition.

- Policy C-6.5 is recommended to include a reference to City Centered Growth as urban development allows for more viable transit options.

Conservation& Open Space

- Policy OS-1.1 encouraging voluntary restrictions to the development potential of property located in a visually sensitive area is meaningless. Development in visually sensitive areas should be linked to an implementation program or mitigation measure as appropriate. 15

Emergency Services

- Policy S-6.5 (mislabeled as Policy P-6.5) indicates service levels for urban (Community Areas), suburban (Rural Centers) and rural areas. The response time for urban areas is established as 8 minutes or less, 90% of the time. The County may wish to consider a more aggressive response time similar to the City of Salinas. The emergency response service level adopted in the City's General Plan is 6 minutes, 90% of the time.

Public Services

- Policy PS-3.2 -" in determining whether there is a long term sustainable water supply, credit may be given for a significant reduction in the historic water use on site. Up to 50% of the average annual water use of 10 of the previous 20 years may be conserved for the proposed development." The intent of this policy is unclear. As it reads, one is led to believe that the policy is intended to contravene the doctrine of correlative rights and reasonable use which gives an overlying property owner the right to the reasonable use of the basin supply. Establishing the "reasonable use" of the water basin is typically established by creating a water balance demonstrating that the new use will use no more water than the historic use. This policy seems to imply that the "reasonable use" for a *new* use is one-half that of the historic use on the property. This policy appears inequitable.

[redacted]

L-5

Mike Novo
October 6, 2006
Page 4 of 6

- Policy PS-4.5- "New development proposed in the service area if existing wastewater collection, treatment and disposal should seek service from those facilities whenever possible." The City recommends that this policy emphasize City Centered Growth and be strengthened to require annexation into a member agency's jurisdiction.

Agricultural

- The inconsistency of policies AG-2.1 and AG-2.3, that support the conversion of farmland and grazing lands to agricultural support and processing facilities with the fundamentals of City Centered Growth is discussed above. The use of farmlands and grazing lands should be limited to raising crops and grazing livestock. The addition of industrial uses in locations outside of incorporated jurisdictions exacerbates traffic conditions on rural roads not designed to accommodate significant movements of truck traffic. Further, these policies have the potential to create isolated work environments in locations bereft of appropriate urban services and housing to serve the workforce. Additionally, the conversion of farmlands and grazing lands to support industrial processing would result in the erosion of the scenic aspects of the open lands used for row crop production and livestock grazing to the detriment of the region's attractiveness as a tourist destination.

Economic Development

- Policies AG-2.1 and AG-2.3 policies conflict with Economic Development policy ED-2.3 which states: "Work with cities to place commercial and industrial development in the most appropriate locations."

- Policy ED-2.3 should reference and reinforce City Centered Growth.

Greater Salinas Area Plan Supplemental Policies

- FIGURE #10 Land Use Plan Greater Salinas

This map and inserts continue to reflect urban land uses in the area formerly designated as Rancho San Juan with significant portions of the property designated for high density residential, industrial and commercial uses. The area is designated as a "Study Area," however the City recommends that the underlying land uses be designated as **Agricultural Farmlands** until the study is completed through either a Community Plan or Specific Plan in conjunction with the annexation into the City of Salinas.

Further, the City also recommends that the lands located northeasterly of the City's Future Growth Area (the generally triangularly shaped area formed by the extension of San Juan Grade road [both sides] and Old Stage Road as it extends to Crazy Horse Canyon Road be designated as a Study Area. Development within this area should be prohibited until the adoption of the required Community Plan or Specific Plan in conjunction with the annexation into the City of Salinas. The insert map entitled

15

[redacted]

L-5

Mike Novo
October 6, 2006
Page 5 of 6

Butterfly Village and Rancho San Juan should be revised to include only the approved Butterfly Villageproject reflecting the Board of Supervisor's action. The inclusion of balance of the *former* Rancho San Juan area in this detail is misleading as Rancho San Juan is now limited to only Butterfly Village.

The Greater Salinas Area Land Use Map should also acknowledge the City's Future - Growth Area initially adopted by the City in 1988, and affirmed with the City's adoption of its 2002 General Plan.

- Policy GS-1.1 discusses the requirement for a special study for the area located north of Russell Road between Harrison Road and San Juan Grade Road adjacent the 671-acre Butterfly Village (a.k.a. Revised Rancho San Juan Specific Plan). Included in the discussion is a list of affected participants — the City of Salinas must be included in this discussion as should opportunities for City Centered Growth.

15

In addition to the above referenced General Plan policies, the City of Salinas has a potentially significant concern with the traffic modeling assumptions prepared for the 2006 General Plan Draft Program Environmental Impact Report. The basis of this concern stems from the work recently conducted by Fehr & Peers Transportation Consultants to assess the transportation implications of the Salinas Future Growth Area proposal using the AMBAG Regional Traffic Demand Forecasting Model. Seemingly, this traffic model includes a number of assumptions regarding trip distribution that appear to be flawed. The "flaws" seem to undermine the validity of the "regional model." Fehr & Peers have indicated that the model may be able to be utilized, however, it will take a significant effort in time and resources to correct the problems. Given the controversial nature of transportation related concerns, the City of Salinas would urge the comment period for the Draft Environmental Impact Report be extended until the concerns with the AMBAG Regional Traffic Demand Forecasting Model can be resolved.

[redacted]

L-5

Mike Novo
October 6, 2006
Page 6 of 6

Thank you for presenting these concerns and considerations to the Planning Commission and Board of Supervisors.

Sincerely,

/s/

DAVE MORA
City Manager

Cc: Mayor and City Council
Vanessa Vallarta, City Attorney
Robert C. Russell, PE, Deputy City Manager/City Engineer
Jorge Rifa, Deputy City Manager

[redacted]

L-5

RESOLUTION NO. 19422 (N.C.S.)

A RESOLUTION OF **THE** CITY COUNCIL OF **,THE** CITY **OUSALINAS**
APPROVING THE AGRICULTURAL LAND **PRESERVATION PROGRAM**

WHEREAS, the City of Salinas has adopted and implemented various policies and mitigation measures in its 2002 General Plan and General Plan Final Program EIR relating to the conversion of agricultural lands to urban uses;

WHEREAS, these policies and measures include cooperation and agreements with the County of Monterey to confirm the general growth direction of the City to the north and east, as memorialized in the 2006 Greater Salinas Area Memorandum of Understanding (GSA-MOU);

WHEREAS, these policies and measures adopted in the 2002 General Plan also include priority to redevelopment and infill projects, as well as City-Centered growth principles; right to farm notices to ensure respect for farming rights; and buffers between agricultural and non-agricultural uses, amongst other General Plan policies and City codes that support and preserve agricultural lands:

WHEREAS, the City in the 2002 General Plan and in the 2006 GSA-MOU expressed its commitment to the development of an agricultural land conservation easement program;

NOW THEREFORE, **BE** IT **RESOLVED** that the City Council of the City of Salinas wishes to clarify and state the basic elements of the City's Agricultural Land Preservation Program.

NOW THEREFORE, **BE** IT **FURTHER RESOLVED** that the Council approves adopts the attached Agricultural Land Preservation Program attached hereto and incorporated by reference.

PASSED AND ADOPTED this 8th day of April 2008, by the following vote:

AYES: Councilmembers Barnes, Barrera, Sanchez, Villegas, and Mayor Donohue

NOES : Councilmember Lutes

ABSENT: Councilmember De La Rosa

Dennis Donohue, Mayor

ATTEST:

Ann Camel, City Clerk

CITY OF SALINAS

AGRICULTURAL LAND PRESERVATION PROGRAM

The City adopted and accordingly commits to, the following mitigation measures in 2002 General Plan Final Program.EIR relating to the conversion of agricultural lands to urban uses:

Cooperation with the County

AG-1. The City will implement Implementation Program COS-9, which requires the City to continue to cooperate with the County of Monterey to implement the Boronda Memorandum of Understanding [Greater Salinas Area-MOU], which directs that City growth occur generally to the north and east away from the most productive farmland.

Priority to Redevelopment and ***Infill***

AG-2. The City will implement Implementation Program LU-7, *which* requires the City to give priority to redevelopment and infill projects that reduce development pressure on agricultural lands. Establish an incentive program to' promote these **projects, such as priority permit processing and density bonuses for such** developments.

Right to Farm Notices

AG-3. The City will implement the Implementation Program COS-11, which requires the City to be consistent with the County of Monterey's "Right-to-Farm" Ordinance, **and the policies with respect to farming** rights **found in the 2007 County of** Monterey Draft General Plan, revise the City's Zoning Ordinance to require the recordation of a Right-to-Farm Notice as a condition of discretionary 'permit **approval for residential development within 1,000 feet of an established** agricultural operation. The purpose of the Notice is to acknowledge that residents **in the area may** experience inconveniences and discomfort associated with the normal farming and grazing activities, such as noise and dust. The Notice shall specifically state that a variety of activities may occur that may be incompatible with the proposed development and that an established agricultural operation in-full compliance with applicable laws, shall not be considered a nuisance due to changes in the surrounding area. The Notice shall also state that a person's right to recover under a nuisance claim against those activities may be restricted.

Buffers** between **Agricultural and Non Agricultural Uses

AG-4. The City will implement Implementation Program COS-10, which requires the City to encourage the provision and maintenance of buffers, such as roadways, **topographic features, and open space, to prevent incompatibilities between** agricultural and non-agricultural land uses. A number of factors shall be used to determine the appropriate buffer, including type of agricultural use, topography, and pesticide and machinery use, among others.

City of Salinas
Agricultural-Land Preservation Program

Agricultural Land Conservation Easement Program

AG-5. The City will work with the County of Monterey, and other local jurisdictions. to create and implement an agricultural land conservation easement program including such measures as securing the dedication of easements or by paying a mitigation fee that could be used to purchase easements through a mitigation bank.

200 Greater Salinas Area Memorandum of Understanding (GSA-MGU)

#4. City and County agree to the creation and implementation of agricultural conservation easements in the unincorporated areas to the west and south of the City's Sphere of Influence insofar as the easements are consistent with the adopted General Plans of the two jurisdictions. (Emphasis added)

Program will include (in addition to AG1—AG5•noted above):

- Tax Sharing Agreement that confirms the growth-direction of the City and contains severe fiscal penalties for growth that is not consistent with the City's established 2002 adopted General Plan and/or City-County policy (i.e., GSA-MOU).

- For development to the west and south of City, the City shall require the dedication of agricultural conservation easements to provide for the permanent protection of agricultural land. For example, the proposed Salinas Ag-Industrial Business Park (UniKool property) includes agricultural conservation easements that will be established prior to final approval by the City, consistent with GSA-MOU paragraph #3. All other GSA-MOU identified growth areas to the south and west of Highway 101, including the Fresh Express annexation project area, the Westside Bypass area as generally shown on Exhibit C to the GSA-MOU and development in the Boronda Redevelopment project area shall be subject to their own separate environmental review and appropriate mitigation measures.

- For development of lands within the GSA-MOU identified growth areas to the • north and east of Highway 101, no agricultural mitigation easement shall be required and a mitigation fee of $750 p/acre shall be assessed for agricultural lands currently designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as "Prime" or "of Statewide Importance.

April 8, 2008 2

L-5

City of Salinas
Agricultural Land Preservation Program

- For purposes of this program, "GSA-MOLT identified growth areas" means annexations or changes in organization in the following areas: the north and east of the City limits that existed in 200.5 and that are referenced in Figure LU-1 of the 2002 City General Plan, as well as the other areas identified in the GSA-MOU, including but not limited to Balsa Knolls and the Salinas Future Growth Annexation and Sphere of Influence (SOI) Area, the Chapin Rogge Road property, areas within the boundary of the final alignment of the Westside Bypass, the proposed Fresh Express expansion and the proposed Unikool Site to the south of Highway 101, and the Boronda Redevelopment Project Area, all as shown on Exhibits A and C to the GSA-MOU. A copy of the GSA-MOU is attached to this Program as Exhibit A.

- Any agricultural mitigation fees assessed by the City pursuant to this Program may, in the City's sole discretion, be applied toward tha following types. of activities designed to preserve and promote agriculture in the Greater Salinas Area (list is not intended to be all inclusive):

  - University level agricultural research, e.g. scientific research for solving agriculture's needs (e.g:, food safety).
  - Increased agricultural educational programs in local high schools and community colleges.
  - Programs for expanding markets for local agricultural products.
  - Promoting careers in agriculture (e.g., scholarships).
  - Contributions to non-profit associations dedicated to agricultural education, promotion or preservation.
  - Contributions to USDA and the University of California Cooperative Extension. .

The City of Salinas Agricultural Land Preservation Program shall apply to all lands subject to the 2002 Salinas General Plan, and the GSA-MOU identified growth areas noted above.

April 8, 2008 3

L-6

RESOURCE MANAGEMENT SERVICES
440 Harcourt Avenue
Seaside, CA 93955
Telephone (831) 899-6737
FAX (831) 899-6211
TDD (831) 899-6207

October 28, 2008

Monterey County
Attn: Carl Holm
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

RE: City of Seaside Comments on General Plan Update 5

Dear Mr. Holm:

The following comments provide an overview of the policy considerations that the City of Seaside believes should be considered by the County of Monterey in its review of the recirculation of the Environmental Impact Report for General Plan Update 5.

Water

Page 4.3-35: EIR references inter basin transfer of water for affordable housing overlay in the Seaside Basin. Under what authority would be an inter basin transfer occur?

Page 4.3-91: All new projects should be required to retain all stormwater on-site per 100-year storm event.

Page 4.3-96&97: New development should be required to include on-site drainage system; same on-site drainage should apply to the Greater Monterey Peninsula

Page 4.3-115: What is footnote (4) referencing in Table 4.3-8.

Page 4.3.138: Reference to proposal by Cal-Am for the construction of injection wells should be noted and how much additional water would be diverted with the establishment of Cal-Am ASR wells. 1

Page 4.3-140: EIR should reference proposed development on Ft. Ord Master Plan and identify how existing infrastructure is adequate to serve projected build-out.

Page 4.3-179: Amend mitigation measure to require retention of storm water for new development per 100 year storm event.

Greater Monterey Peninsula Master Plan

The County should coordinate with Caltrans to determine what information must be submitted with the application for the designation of a Scenic Highway between the City of Seaside and the City Marina and how Monterey County and applicable jurisdictions must coordinate on the application. 2

L-6

Monterey County General Plan Update 5 EIR Comments
Page 2 of 3

Land Use

The City of Seaside has the following concerns related to the Fort Ord Master Plan Area:

Residential Land Use Policies

The Fort Ord Master Plan should acknowledge and discuss the City's future growth potential west of the urban boundary line. The City of Seaside is considering the following projects within its city limits: 3

1. Relocation of City of Seaside Corporation Yard to Polygon 18 on Figure 2; and
2. Development of a Veterans Cemetery on Polygon 20c on Figure 2; and
3. Surplus II Specific Plan on Polygon 20e on Figure 2.

Circulation Element

Of particular concern to the City of Seaside are the potential impacts that could be generated by residential and commercial development within the Fort Ord Area Master Plan and designated Affordable Housing Overlays within the Greater Monterey Peninsula. The City of Seaside recommends that the traffic study for the General Plan Update 5 include an evaluation of the cumulative impacts associated with the City of Seaside's and City of Marina's approved and planned projects in relation to the build-out of the County lands on Fort Ord and Fort Ord Business and Operations Plan (Appendix B of Reuse Plan) and study the following intersections/roadways: 4

Intersections

- General Jim Moore and Light Fighter Drive
- General Jim Moore and Giggling Road
- General Jim Moore and Coe Avenue
- General Jim Moore and Broadway
- Light Fighter Drive and Second Avenue
- Highway 1 and Light Fighter Drive
- Highway 1 and SR 218
- Del Monte Boulevard and SR 218 (Canyon Del Rey Blvd.)
- Del Monte Boulevard and Broadway Avenue
- Del Monte Boulevard and Playa Avenue
- Fremont Boulevard and SR 218 (Canyon Del Rey Blvd.)
- Fremont Boulevard and Broadway Avenue
- Fremont Boulevard and Ord Grove Avenue
- Fremont Boulevard and Del Monte Avenue
- Gigling Road and 8th Avenue
- Monterey Road and Fremont Boulevard
- Monterey Road and Coe Avenue

L-6

Monterey County General Plan Update 5 EIR Comments
Page 3 of 3

Roadways

- Broadway Avenue between Del Monte Boulevard and General Jim Moore Road
- Del Monte Boulevard between Canyon Del Rey Boulevard and Fremont Boulevard
- Fremont Boulevard between Canyon Del Rey and Broadway Avenue
- Fremont Boulevard between Broadway Avenue and Highway 1
- General Jim Moore between SR 218 and Light Fighter Drive
- Eucalyptus Road
- Giggling Road between 8th Avenue and General Jim Moore Road
- Light Fighter Drive between General Jim Moore and Highway 1

4

Hydrology and Water Quality

- Update EIR to include identification of potential reservoir and water impoundment sites that would be located within the City of Seaside on the former Fort Ord and/or its sphere if influence as designated by LAFCO.
- The Marina Coast Water District shall be included in list of water agencies to mitigate further seawater intrusion.

5

If you have any questions or comments regarding the City of Seaside's comments on the recirculation of the Environmental Impact Report for General Plan Update 5, you can contact me at (831) 899-6726.

Sincerely,

Rick Medina

Rick Medina
Senior Planner

CC: Diana Ingersoll, Deputy City Manager-Resource Management Services
Barbara Nelson, Planning Services Manager

L-7

COUNTY OF SAN BENITO
PLANNING & BUILDING INSPECTION SERVICES

3224 Southside Road
Hollister, CA 95023
e-mail: sbcplan@planning.co.san-benito.ca.us

Phone: 831-637-5313
Fax: 831-637-5334

October 28, 2008

Carl Holm, Planning Manager
Monterey County Planning Department
168 W Alisal St., 2nd Floor
Salinas, CA 93901-2438

Subject: Comments regarding Monterey County's 2007 General Plan Update (5) DEIR

Dear Mr. Holm:

Thank you for the opportunity to review and comment on the 2007 Draft Environmental Impact Report for the Monterey County General Plan. Staff would like to express its support for the continued effort to complete this General Plan update. As a neighboring agency, San Benito County has a continued interest in this process. Decisions made within your jurisdictional boundaries may have significant effects on our County. Therefore, listed below are some comments submitted by staff in October of 2006, related to General Plan update number 4, and new concerns staff believes that the document should address in more detail. While past the official comment period, our Board will be reviewing this matter on November 4 and may also have some comments. 1

The County's previous comments regarding the 2006 General Plan update (update 4) Draft Environmental Impact Report, and subsequent comments follow.

- *We encourage Monterey County to work with San Benito County in improving locations along our shared border in areas such as near Gonzales, Soledad and King City in addition to the Aromas and Prunedale areas.* 2

Although this comment does not need to specifically be addressed in this EIR document, San Benito would like to emphasize the ongoing need for governmental cooperation when considering development projects or policies for development for which the effects would reach across County boundaries and potentially conflict with current San Benito County policies.

- *We are also interested in better coordinating public safety and transportation planning especially in those areas in particular along La Gloria Grade Road as some problems occur there from time to time.* 3

This comment relates directly to transportation corridor planning. Monterey County is in a unique position as it boarders San Benito County, which has a number of recognized outdoor recreation areas. One area in particular, The Pinnacles, is working toward National Park status and as such may require increased attention from both San Benito and Monterey Counties in order to ensure access to the park is convenient, safe, and desirable.

L-7

- *We also would like to cooperate with you again in protection of the ridgeline areas that we share and in minimizing the impact of nighttime lighting in the rural areas.* 4

Land Use Element Policy LU-1.13 appears to appropriately address light and glare. Open Space and Conservation Element OS-1.12 appears to prohibit ridgeline development. Therefore, staff believes this 2006 comment has been adequately addressed. Thank you.

Staff requests the final EIR for the 2007 General Plan update address the following additional concerns:

Transportation:
Regional transportation impacts are addressed in Section 4.6. of this document. TRAN-1A, TRAN-2B, TRANS-3B describe that implementation of the 2007 General Plan would have significant impacts to roads within and external to Monterey County. In addition, TRAN-1A describes that neither the County nor TAMC projects listed as capital improvement projects, which are to be funded by regional impact fees, will fully mitigate the impacts of the 2007 plan. Staff feels that the development of policies should reach outside the established benchmarks of Monterey's policies. In addition, if regional traffic created by an authority's planning guidelines may substantially degrade neighboring jurisdiction roadways for which higher standards are in place, the governing authority has the responsibility to ensure traffic impacts are mitigated accordingly. Currently, San Benito County has established policy describing a minimum LOS of C for roadways within our County. Areas within San Benito which may be affected by Monterey County traffic impacts primarily include the Aromas area and State Highway 101. Monterey County's planning guidelines may have a significant effect on surrounding jurisdictions and should be restrictive in nature in order to provide continuity with all surrounding regional planning guideline standards. By encouraging full mitigation of any potential impacts Monterey County would not place additional burden on neighboring jurisdictions. 5

Air Quality:
Both San Benito and Monterey Counties are located within the Monterey Bay Unified Air Pollution Control District's jurisdiction. Being that we are in a common air basin, a discussion should be included in the environmental document that addresses this concern and the possible significant effects such as high levels of traffic congestion along the 101 corridor could have on attainment levels within either jurisdictions. 6

Thank you again for the opportunity to comment.

Sincerely,

Art Henriques
Director of Building and Planning

Cc: Susan Thompson, CAO
Board of Supervisors

Monterey County
2007 General Plan Update DEIR

Page 2 of 2

October 28, 2008

L-8 54

COUNTY OF SANTA CRUZ

PLANNING DEPARTMENT
701 OCEAN STREET, 4TH FLOOR, SANTA CRUZ, CA 95060
(831) 454-2580 FAX: (831) 454-2131 TDD: (831) 454-2123
TOM BURNS, PLANNING DIRECTOR

Monterey County Planning and Building Inspection Administration
FEB 02 2009
RECEIVED

Reid as CEQA Comments 2/2/09 11:57am

February 2, 2009

Carl Holm
RMA-Planning Salinas Permit Center
168 W. Alisal St. 2nd Floor
Salinas, CA 93901

Dear Mr. Holm,

Thank you for the opportunity to comment on the 2007 General Plan Update and the 2007 General Plan Draft EIR. The Planning Department has reviewed both documents. We wish to express our concerns regarding significant and unavoidable impacts to the Pajaro groundwater basin identified in the EIR, particularly as this may impact future development within Santa Cruz County.

As noted in Section 1.4 of the EIR, development consistent with the Monterey County 2007 General Plan would result in "significant and unavoidable impacts" to groundwater resources in the Pajaro basin, exacerbating existing groundwater overdraft and saltwater intrusion (Section 1, page 39 of EIR). Overdraft of the aquifer is anticipated, even with recycling and conservation measures.

To address significant and unavoidable impacts to the Pajaro groundwater basin, mitigation measure WR-1 would implement a regional group to identify and support a variety of new water projects, water management programs, and multiple agency agreements to provide additional domestic water supplies for Monterey Peninsula and Seaside basin, while continuing to protect the Salinas and Pajaro River groundwater basins from saltwater intrusion. However, even with the proposed mitigation measure, impacts to the Pajaro groundwater basin are anticipated to be "significant and unavoidable" (page 1-39). 1

We believe that mitigation measure WR-1 is inadequate to address the significant impacts to the Pajaro Groundwater Basin. The Santa Cruz County Planning Department is particularly concerned that the Pajaro area is proposed as one of five community areas, with development planned at an urban level. Such intensive development is likely to further exacerbate groundwater overdraft and saltwater intrusion within the Pajaro groundwater basin. Such impacts are likely to restrict future development in those portions of the Pajaro community within Santa Cruz County.

1

L-8

Calderon, Vanessa A. x5186

From: Annie Murphy [PLN400@co.santa-cruz.ca.us]
Sent: Monday, February 02, 2009 11:57 AM
To: ceqacomments
Subject: Comments from County of Santa Cruz Planning Department on the 2007 General Plan Update and Draft EIR

Monterey County Planning and Building Inspection Administration
FEB 02 2009
RECEIVED

Letter to Monterey County.doc ...

Hello Carl,

Hope you and everyone in the Department are doing well!

Attached are the comments from the Santa Cruz County Planning Department regarding the Monterey County 2007 General Plan Update and Draft EIR.

Sincerely,

Annie Murphy
Planner, Policy Section
Santa Cruz County Planning Dept.
Phone: (831) 454-3111
Fax: (831) 454-2131
Email: pln400@co.santa-cruz.ca.us

<<Letter to Monterey County.doc>>

1

Message

L-9
See I-22

Holm, Carl P. x5103

From: Holm, Carl P. x5103
Sent: Thursday, October 16, 2008 8:58 AM
To: 'Hagan, Kristin A.'
Cc: 'Powers, Briana'
Subject: RE: 2007 General Plan Update

The ALUC asked for further information on a site near the Monterey Airport...it is planned to return to the ALUC on October 27. The Commission was were not concerned with the area around King City because it had not changed from what they considered and accepted in GPU4. Figure 4 in GPU4 illustrated the location of planned Community Areas. Land use designations around King City are illustrated on the South County Area Plan Land Use map (Figure LU-9). In addition, the Agricultural Winery Corridor Plan (AWCP) includes area around King City. All of this is available for review on our website at:
http://www.co.monterey.ca.us/planning/gpu/GPU_2007/gpu_2007.htm

If after reviewing this information you have questions, please feel free to contact me.

Sincerely,
Carl P. Holm, AICP
RMA - Planning Department
Assistant Director

-----Original Message-----
From: Hagan, Kristin A. [mailto:khagan@kmtg.com]
Sent: Wednesday, October 15, 2008 11:57 AM
To: Holm, Carl P. x5103
Cc: Powers, Briana
Subject: 2007 General Plan Update

Carl,

Thanks for you return call yesterday. Per your request I'm sending you an e-mail regarding my questions pertaining to the 2007 General Plan Update. As indicated in my messages, I practice airport land use planning and have a number of clients with projects near the King City Airport. I noticed that the Monterey County Airport Land Use Commission received at its last meeting on September 22, 2008, an update regarding the status of the 2007 General Plan Update. I was wondering if at that meeting the Commission voted to take any action with respect to reviewing and considering the 2007 General Plan Update.

I also noticed that in the 2006 General Plan Update (GPU4), there is a reference to a *Figure 4*, which illustrates the proposed land uses within two-miles of the King City Airport. I'm trying to confirm whether that same figure is referenced and used in the 2007 General Plan Update. If so, I would like to get a copy of this figure. 1

Any assistance you can provide is greatly appreciated. Thanks for your time.

Take care,
Kristin

11/06/2008

sage

L-9
See I-22

Kristin A. Hagan
Attorney at Law

1675 Chester Avenue, Suite 320
Bakersfield, CA 93301

T: 661.864.3800
F: 661.864.3810

E-Mail
V-Card
www.kmtg.com

KRONICK MOSKOVITZ TIEDEMANN & GIRARD
A LAW CORPORATION

Shared Vision. Innovative Legal Solutions. Successful Clients.

11/06/2008

L-10 6D

MONTEREY BAY
Unified Air Pollution Control District
serving Monterey, San Benito, and Santa Cruz counties

Interim Air Pollution Control Officer
Ed Kendig

24580 Silver Cloud Court • Monterey, California 93940 • 831/647-9411 • FAX 831/647-8501

Monterey County Planning and Building Inspection Administration
FEB 02 2009
RECEIVED

February 2, 2009

Mr. Carl Holm, Assistant Planning Director
Monterey County RMA / Planning Department
168 West Alisal Street, 2nd Floor
Salinas, Ca 93901

Sent Electronically To: CEQAComments@co.monterey.ca.us
Original Sent by First Class Mail.

Rec'd e mail 2/2/09
2/2/09 3:50 pm

SUBJECT: 2007 MONTEREY COUNTY GENRAL PLAN DRAFT EIR (GPU5)

Dear Mr. Holm:

The Air District submits the following comments for your consideration:

4.7.2 ENVIRONMENTAL SETTING:

P. 4.7-2. Air Pollutants
Please note the Table 4.7-1, which is referenced in this section, is missing. This table was to summarize current State and federal Ambient Air Quality Standards (AAQS). Table 4.7-1 on page 4.7-6 of the DEIR presents the distribution of statewide wine fermentation emissions by month rather than information in a format that could be compared to applicable AAQSs. Current AAQSs are summarized in the attached PDF table and can be accessed at http://www.arb.ca.gov/research/aaqs/aaqs2.pdf. 1

P. 4.7-3. Ozone, Natural vs. Man-Made VOC
This section blends a discussion of natural and anthropogenic (man-made) emissions. The first and second sentences on this page indicate that current NCCAB emissions of VOC are estimated to be 100 to 125 tons per day and that most of the emissions come from the oak and coastal chaparral environment. As described in the first paragraph on page 4-7 of 2008 AQMP, these figures actually refer to naturally occurring VOC emissions and not man-made or anthropogenic emissions. The 2008 AQMP focuses on man-made emissions, which is the category of emissions subject to regulation. As illustrated in Figure 4-3 in the 2008 AQMP, 2007 NCCAB anthropogenic emissions of VOC are estimated to be 70 tons per day. 2

P. 4.7-3. Ozone, Natural vs. Man-Made NOx
Similarly, the third sentence indicates that NCCAB emissions of NOx are in the 1 to 5 ton per day range and are highest during wildfire events. Again, these figures pertain to naturally occurring emissions and not regional man-made NOx emissions. Man-made emissions of NCCAB NOx are illustrated in Figure 4-7 of the 2008 AQMP and are estimated to be 81 tons per day. The District would be glad to provide additional information on this subject. 3

L-10

P. 4.7-3. Ozone, Discussion of Federal Standard
The first sentence of the first full paragraph on this page indicates that on June 15, 2004 the EPA replaced the 1979 one-hour standard with more stringent 8-hour standard. The EPA adopted the 0.08 ppm 8-hour standard in 1997 and on June 15, 2004 the EPA designated the NCCAB as an attainment area for the 8-hour standard. The 1979 one-hour standard was then revoked one year later on June 15, 2005. The eight-hour federal standard adopted by EPA in 1997 is 0.08 ppm. Please refer to pages 5 through 7 of the District's 2007 Federal Maintenance Plan for further discussion. This can be accessed at http://www.mbuapcd.org/index.cfm?Doc=451. After the Maintenance Plan was prepared, EPA adopted a more stringent eight-hour standard of 0.075 ppm on March 12, 2008. 4

P. 4.7-3. Ozone, Discussion of State Standard
The second sentence of the second full paragraph on this page indicates that the new State 8-hour standard is 0.07 ppm. It should be noted that the State standard is 0.070 ppm, with three significant figures. This is important because it reduces round-off play when averaging data. Currently, the State ozone standard is more stringent (health protective) than the corresponding federal standard. 5

P. 4.7-3. Carbon Monoxide
State and federal standards were not exceeded during 2005-2007, which is the most recent three years of data. As part of the Environmental Setting discussion, it should be mentioned that ambient CO readings in the NCCAB are low and have a history of being well within applicable standards. 6

P. 4.7-3. Nitrogen Oxides
In order to relate this section to the NCCAB, the Draft EIR should have specified that major sources of NO_x in the NCCAB include exhaust emissions from on-road motor vehicles, off-road mobile sources and industrial sources. These are illustrated in Figure 4-5 of the 2008 AQMP. There are no refineries in the NCCAB. 7

The NCCAB is designated attainment for the State NO_2 standard and Unclassified/Attainment for the federal NO_2 standard. Current NCCAB designations for all criteria pollutants are presented in Table 2-2 on page 2-5 of the 2008 AQMP.

P. 4.7-4. Particulate Matter
To relate this section to the NCCAB, please note that primary sources of particulate matter in the NCCAB include fugitive dust from unpaved roads, agricultural tilling, agricultural wind-blown fugitive dust, prescribed fires and construction dust. These are summarized in Table 4-2 of the District's 2005 Particulate Matter Plan, which is available at http://www.mbuapcd.org/index.cfm?Doc=358. 8

2

L-10

P. 4.7-4. Volatile Organic Compounds
The third sentence indicates that major sources of VOCs include oil refineries, and oil-fired power plants. There are no oil refineries or oil fired power plants in the NCCAB. Major sources of VOCs in the NCCAB include exhaust emissions from on-road motor vehicles, solvent evaporation, and exhaust emissions from off-road mobile sources (See Figure 4-3 from the 2008 AQMP). Wineries are a minor contributor to regional VOCs representing less than 1% of the NCCAB VOC inventory. 9

P. 4.7-5. Wine Fermentation Discussion
The sixth paragraph on this page ends in a comma. Please complete the sentence or make the necessary typographical correction. 10

P. 4.7-5. Discussion on Wine Making Process
The extended discussion on how wine is made, while informative, deviates from the general discussion on VOCs and would fit better in a separate section. 11

P. 4.7-6. Table 4.7-1, Statewide Wine Fermentation
The monthly distribution of wine fermentation emissions shown in the table would be more informative if they were specific to the amount of wine actually fermented in Monterey County. Also, the discussion introduces the fermentation figures as being harvest figures. Because wine grapes can be exported to other areas, the amount of wine grapes harvested in Monterey County is not relevant unless the Draft EIR specifies 12

- the amount of grapes that are grown locally
- the amount and increase of the local harvest that is fermented locally
- the amount and increase / decrease of local harvest that is shipped outside Monterey County
- and a comparison of the potential increase in emissions from Monterey County fermentation and wine aging, compared to the decrease in emissions (VMT) that would be avoided by a decrease in shipment of local grapes to out-of-County grape processers / winemakers and wine agers.

P. 4.7-7. Table 4.7-1, Toxic Air Contaminants
The first sentence in the third paragraph on this page indicates that CARB has listed particulate matter as a TAC. The sentence should be corrected to specify that this listing pertains to diesel particulate matter (diesel exhaust) and not particulate matter in general. 13

P. 4.7-7. Attainment Status
Many of the designations described in this section are dated. Please refer to Table 2-2 on page 2-5 of the 2008 AQMP for current designations. For instance, in relation to the State ozone standard, the ARB's most recent designation (July 26, 2007) shows that the NCCAB is nonattainment. The moderate nonattainment and nonattainment transitional designations are no longer applicable. The first sentence of the second paragraph under Attainment Status states that EPA has designated the NCCAB as a moderate maintenance 14

3

L-10

area for ozone. There is no such thing as a moderate maintenance area and EPA has designated the NCCAB as an attainment area for ozone. 14

P. 4.7-8. Air Quality Monitoring Data
Please note that Table 4.7-2 referenced in this section is missing. This table was to summarize the most recent three years of data for Monterey County. Table 4.7-2 in the DEIR (page 4.7-11) summarizes wine fermentation and aging emissions. 15

P. 4.7-8. Air Quality Monitoring Data
The third sentence in this section indicates that the Salinas station is the monitoring station for Monterey County. Please note that the Salinas site is not the only air monitoring station operated in Monterey County as there are two other air monitoring stations: one in King City and one in Carmel Valley. Including data from these sites would more accurately portray air quality in Monterey County. 16

4.7.3 REGULATORY FRAMEWORK:

P. 4.7-8. EPA
The second sentence in this section states that the NAAQS are set to the maximum ambient (background) level considered safe. The NAAQS are set according to the maximum safe level in the ambient breathable outdoor air, and according to background. Background is typically a much lower concentration than levels that include man-made emissions. 17

P. 4.7-8. CARB
It should be noted that State law vests California Air Resources Board (CARB) with direct authority to regulate pollution from motor vehicles registered in California, as well as fuels and consumer products sold in the State. 18

P. 4.7-9. MBUAPCD
The overall role of the MBUAPCD should be mentioned before introducing the specific construction mitigation measures. For reference, as required by the California Clean Air Act and Amendments (HSC Section 40910 et seq.) and the Federal Clean Air Act and Amendments (42 U.S.C. Section 7401 et seq.), the District is responsible for air monitoring, permitting, enforcement, long-range air quality planning, regulatory development, education and public information activities related to air pollution. California Health and Safety Code Sections 39002, et seq. and 40000, et seq. require local air districts to be the primary enforcement mechanism for controlling pollution from local business and industry. Air districts must have rules and regulations for the attainment and maintenance of federal and state ambient air standards. 19

P. 4.7-10. MBUAPCD
The first header indicates that the MBUAPCD has mitigation measures for heavy duty equipment. The measures listed are specific to heavy duty diesel equipment. Also, a typo in the hyphenated word "non-zone season" in the 4th bullet in this section needs to be corrected to read "non-ozone season". 20

4

L-10

P. 4.7-11. MBUAPCD Air Quality Management Plan
The operative Air Quality Management Plan (AQMP) was adopted by the Air Board in august 2008. It integrated the Association of Monterey Bay Area Government's "Monterey Bay Area 2008 Regional Forecast" for population, housing and employment. Before discussing the District's 2008 AQMP for ozone, it would be helpful to mention two other important air plans the District has developed for the region: 21

SB 656 Particulate Matter Plan (December 2005)
This plan outlines measures to make progress toward achieving the State PM_{10} standard by reducing fugitive dust, especially along the ag/urban interface, as well as emissions of particulate matter from diesel exhaust through education about Best Management Practices and grant incentives.

2007 Federal Maintenance Plan
This plan describes how the federal ozone standard will be maintained in our area.

P. 4.7-11. Table 4.7-2, AQMP VOC Aging & Fermentation Emissions
A numerical artifact (16510.8257) appears in this table for the year 2030 Wine Aging category. The number from the AQMP is 0.8257 tons per day. 22

P. 4.7-12. Rules 201 and 417
In the second bullet, please correct the text following the rule name for Rule 207, which makes this sentence hard to follow. Also, in the following paragraph, wineries may be subject to prohibitory Rule 417, Storage of Organic Liquids, whether or not they are exempt from Rule 201. While Rule 417 applies primarily to storage of petroleum based liquids, it would be applicable to wineries if vapor pressure and tank size met the criteria of the rule. 23

4.7.4 PROJECT IMPACTS:

P. 4.7-12. Thresholds of Significance
It should be noted that the 137 lbs/day construction related threshold for NO_x only applies to non-typical construction equipment (page 7-2 District's 2008 CEQA Guidelines). Typical equipment, which includes scrappers, tractors, dozers, graders, loaders and rollers, are accommodated in the District's emission inventory. 24

P. 4.7-13. Thresholds of Significance
Similar to the prior comment, the last paragraph under 4.7.4.1 should be modified to state that emissions of ozone precursors, including NOx and VOC, from typical construction equipment are accommodated in the inventory. 25

P. 4.7-15. AQ-1, Table 4.7-3, Population Consistency
This section concludes that the 2007 General Plan is consistent with the population 26

5

L-10

growth projected in the MBUAPCD's AQMP and therefore impacts associated with AQ-1 are less than significant. However, the comparisons are based on the outdated 2004 AMBAG population figures for Monterey County for 2030, which were used in the 2004 AQMP. AMBAG's 2008 population forecast for 2030 is 515,549 and is lower than the 602,790 population figure for 2030 shown in Table 4.7-3 for the 2007 General Plan. The 2007 General Plan population forecast for 2030 is 87,241 persons greater than the applicable 2008 AMBAG forecasts for 2030, and would make the General Plan Update inconsistent with the applicable AQMP and a significant impact to air quality in the region. 26

P. 4.7-15. AQ-1, Table 4.7-3, Demographic Figures
Please explain why the Population, VMT, Housing Units and Employment "With Project" figures decrease between 2000 and 2030, despite the General Plan Update's accommodating greater population, housing and VMT. 27

P. 4.7-15 & 16. AQ-1, MBUAPCD AQMP
The significance determination section uses the generic name Clean Air Plan for the District's AQMP for ozone. Please specify which plan is being referred to (2004 or 2008) and note that the actual name of the document is the Air Quality Management Plan. As already specified, herein, the operative AQMP was approved in August 2008. 28

P. 4.7-16. AQ-1, Table 4.7-4, VOC Fermentation Emissions
Please note that the fermentation emission factors for red and white wine used in Table 4.7-4 are actually from ARB (ARB Area Source Methods, Chapter 5.1, March 2005) and not EPA. The factors in the table are higher than those used in the AQMP, which were from Chapter 9.12.2 of EPA's AP-42 document. The AQMP used EPA's factors of 4.6 and 1.8 lbs/kgal for red and white respectively, rather than the 6.2 and 2.5 lb/kgal factors shown in the table. If the same factors were applied as used in the 2008 AQMP, estimated fermentation emissions associated with 10 full scale and 40 artisan wineries would be lower than the 905.3 lbs/day shown in the table. 29

P. 4.7-16. AQ-1, Table 4.7-4, VOC Aging Emissions
The calculations for the red and white aging related emission factors (0.02782 and 0.02583 lbs/kgal) given in the table appear to be off by a factor of 1,000 and do not work out as shown in the table. Please verify the units of the factors and make any necessary corrections to the table. 30

P. 4.7-17. AQ-1, Buildout Significance Conclusion
It is concluded that air quality impacts associated with buildout by 2092 would be less than significant because of the beneficial policies in the 2007 General Plan and Area Plans. However, consistency with the AQMP is determined by consistency with the population forecasts in the AQMP, not area plans. Also, the expected air quality benefits of the 2007 General Plan and local Area Plans are not quantified. Since the 2092 buildout date is beyond the forecast horizon of the 2008 AQMP and AMBAG population forecasts, the significance conclusion cannot be supported. 31

6

L-10

Moreover, even if the "encouragement" and "promotion" activities cited as mitigation in various policies in pages 4.7-13 et seq. were actually undertaken, encouragement and promotion do not guarantee that anything quantifiable or enforceable would result, so this text and any implied mitigation should be eliminated from the EIR.

Mobile Source Emissions Associated with Growth
The Air District does not have regulatory authority over mobile sources. Without stable funding to ensure the availability of public transit, the air quality benefits of this alternative to single-occupancy automobiles should be constrained; this potential mitigation should be better evaluated. 31
What evidence exists to support an inference that employees would bike or walk to work (how many people, how often, and what amount of VMT would be reduced)?

Area Source Emissions Associated with Growth
A significant reduction to ozone precursors and particulate matter could be accomplished by restricting the installation and operation of wood-burning fireplaces and stoves. Many cities have adopted this strategy to reduce their project's air quality impacts to less-than-significant levels. The following is suggested for implementation by the County as a standard condition:

"The construction, installation or operation of a wood-burning fireplace or a wood-burning stove shall be prohibited in perpetuity on all residential properties. Only EPA-certified natural gas/liquefied petroleum gas (LPG) fireplaces/ stoves shall be constructed, installed or operated. This restrictive covenant shall be recorded on the title of all parcels in the project and shall run with the land. All Building Plans and Building Permits shall include this express condition."

P. 4.7-20. AQ-2, Significance Determination – The second paragraph is rather disjointed and should be rewritten. 32

P. 4.7-20. AQ-2, Mitigation Measure AQ-1
The disjointed sentence following OS-10.5 should also be rewritten. 33

P. 4.7-20. AQ-2, 2030 Significance Conclusion
Implementation of MBUAPCD's mitigation measures by policy for construction activities and equipment is a very good idea. However, there is no guarantee that they would reduce emissions unless they are quantified and enforced to reduce emissions to a less-than-significant level... Consequently, the conclusion of a less than significant impact is speculative at this time. Also, the construction related mitigation measures referenced should read AQ-1 and AQ-2 rather than AQ1 though AQ-3 and the referenced planning horizon should be 2030 rather than buildout. 34

P. 4.7-21. AQ-2, Buildout Significance Conclusion
The same comments as applied to the 2030 planning horizon also apply here. 35

P. 4.7-22. AQ-3, Appendix A EMFAC Calculation 36

7

L-10

The third full sentence on this page indicates that the methodology and traffic data input to the EMFAC2007 on-road motor vehicle emission model are provided in Appendix A of the DEIR. However, Appendix A contains the Notice of Preparation and the referenced calculations cannot be found or reviewed. As a result, it was not possible to evaluate this information. 36

P. 4.7-22. Table 4.7-5, Entrained Paved Road Dust
The EMFAC model only estimates exhaust emissions for PM10 and PM2.5, but not entrained road dust for paved road dust. Since entrained road dust emissions increase with VMT, the entrained road dust calculations should be added to the exhaust emissions and the corresponding conclusions updated to reflect the revised totals. 37

P. 4.7-23. Table 4.7-6, Year 2000 Existing Environment
The year of the existing environment in this table is taken as the year 2000, which is no longer representative of the existing environment. The existing environment should be a year closer to the time the Notice of Preparation for GPU5 was submitted, which was 2007. 38

P. 4.7-24. Table 4.7-7, VOC Winery Emissions
The same comments as applied to Table 4.7-4 apply here. Please verify the units of the factors and make any necessary corrections to the table. 39

P. 4.7-33. MM AQ-6. Construction Contracts
As written, this mitigation measures does not ensure that emissions would be less than significant. One-size-fits-all does not work, especially in an industry that uses various models, model years and configurations of equipment on each job. IN addition, project location and meteorological conditions are factors that affect air quality; a project in a remote area that would not result in unhealthful emissions would be evaluated differently from a project in an area of dense urban development. The Air District suggests that construction equipment should comply with applicable State laws and regulations, and Air District thresholds of significance. 40

P. 4.7-33. AQ-7, Development of Sensitive New Land Uses
As written, this mitigation measures is precatory; it is not enforceable. Given the County's authority over land use decisions, if the County chooses not to implement the siting recommendations in the California Environmental Protection Agency / California Air Resources Board's "Air Quality and Land Use Handbook: A Community Health Perspective, it would be more helpful to simply notify prospective residents of the potential long-term health impacts, as in being done in Fresno County. 41

Section 4.16, Climate Change

Inasmuch as the narrative in Chapter 4.16 is based on Appendix B - Methodology, comments are focused on it. 42

8

L-10

Vehicular Emissions
Off-road vehicular emissions are not included. Agricultural off-road emissions are estimated but the methodology used is very limiting.

Trying to establish the "unincorporated-only" emissions (see above) all VMT on County roads and 25% of the VMT on state highways have been included. This appears to be based on a 75%/25% split in population between City and County residents. Please explain the basis for this split.

Initially, there seems to be a "source" mix-up. In the text it refers to Bruso but the table refers to Forney. Please explain.

Please explain why they fugitive CH4 emissions from gas transmission were not included.

Landfill Emissions

Emission factors from ICLEI/CACP Software are cited but there is not relation to the emission factor, or its derivation. ICLEI does not generate emission factors. What methodology was used?

43

The document states that 97% of the solid waste goes to landfills that are flared, or have landfill gas to energy technologies. It also specifies that EPA has estimated flaring efficiency to be 75%. This efficiency factor was used to estimate all of Monterey's net CH4 emissions. This generates a couple of concerns:

It did not differentiate between the flaring and the landfill gas to energy technologies. These efficiencies are different.

The flaring efficiency states that the 75% of CH4 is converted to CO2. What are the resulting CO2 emissions?

Agricultural Equipment Fuel Use
The method compares the proportion of agricultural acreage in Monterey to that in all of California and then apportions the state GHG emissions for agriculture proportionately. The use of this method should be explained. (The ARB has a model (OFFROAD) which is used to estimate criteria emissions from off-road motor vehicle sources, including agricultural equipment. It has already apportioned this usage by county and air basin and have projected the growth and controls out to the future. This model is for criteria pollutants and does not include factors for CO2, CH4, or N2O like the on-road equivalent (EMFAC), but it does include estimated fuel usage. At least the CO2 (which is the majority of the associated GHG emissions) could be estimated by using the fuels usage and the CCAR's fuel-based emission factor.)

9

L-10

The ARB method would be doubly useful in that it would also allow for the estimation of all off-road equipment, including construction, industrial, and recreational. Please explain why this method was not used.

General Comments on Forecasting Methodology
The document states that fuel efficiency and low carbon fuel standards were used in estimating future, but this did not include reduction on GHG emissions from heavy-duty vehicles. Please explain.
The document concludes that an 8% increase in renewables forecasted by PG&E would result in an equivalent 8% reduction in CO2. . This assumes that renewables have no CO2 emissions, which is not accurate. Renewables have reduced CO2 emissions, not zero CO2 emissions. Please explain.

43

Thank you for the opportunity to review the document.

Sincerely,

Jean Getchell
Supervising Planner
Planning and Air Monitoring Division

Attachment: Ambient Air Quality Standards

10

L-10

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1] Concentration [3]	California Standards [1] Method [4]	Federal Standards [2] Primary [3,5]	Federal Standards [2] Secondary [3,6]	Federal Standards [2] Method [7]
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m³)	Ultraviolet Photometry	---	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m³)		0.075 ppm (147 µg/m³)		
Respirable Particulate Matter (PM10)	24 Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		---		
Fine Particulate Matter (PM2.5)	24 Hour	No Separate State Standard		35 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	15.0 µg/m³		
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10mg/m³)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m³)	None	Non-Dispersive Infrared Photometry (NDIR)
	1 Hour	20 ppm (23 mg/m³)		35 ppm (40 mg/m³)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m³)		---	---	---
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m3)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m³)	Same as Primary Standard	Gas Phase Chemiluminescence
	1 Hour	0.18 ppm (339 µg/m³)		---		
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	---	Ultraviolet Fluorescence	0.030 ppm (80 µg/m³)	---	Spectrophotometry (Pararosaniline Method)
	24 Hour	0.04 ppm (105 µg/m³)		0.14 ppm (365 µg/m³)	---	
	3 Hour	---		---	0.5 ppm (1300 µg/m³)	
	1 Hour	0.25 ppm (655 µg/m³)		---	---	---
Lead[8]	30 Day Average	1.5 µg/m³	Atomic Absorption	---	---	---
	Calendar Quarter	---		1.5 µg/m³	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Rolling 3-Month Average[9]	---		0.15 µg/m³		
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards		
Sulfates	24 Hour	25 µg/m³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence			
Vinyl Chloride[8]	24 Hour	0.01 ppm (26 µg/m³)	Gas Chromatography			

See footnotes on next page ...

For more information please call ARB-PIO at (916) 322-2990

California Air Resources Board (11/17/08)

L-10

1. California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter—PM10, PM2.5, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calender year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

7. Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.

8. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

9. National lead standard, rolling 3-month average: final rule signed October 15, 2008.

For more information please call ARB-PIO at (916) 322-2990

California Air Resources Board (11/17/08)

L-11 18

Monterey County
Planning and Building
Inspection Administration

FEB 06 2009

RECEIVED
rec'd email 2/6/09
10:41 AM

-----Original Message-----
From: Tim Jensen [mailto:tjensen@mprpd.org]
Sent: Friday, February 06, 2009 10:41 AM
To: Holm, Carl P. x5103
Subject: GPU5 Comments

Good Morning Carl;

I apologize for the late submission. Could you review the District's comments and reply with a short summary opinion on their validity. Thx. If I don't hear back from you these are what the District will submit.

Tim Jensen
Planning & Conservation Manager

Monterey Peninsula Regional Park District
60 Garden Court, Suite 325
Monterey, CA 93940

(831) 372-3196 x2 (office)
(831) 372-3197 (facs)
tjensen@mprpd.org

www.mprpd.org

L-11

State Planning and Zoning Law (Government Code Section 65302(a)) establishes the requirements for the land use element of the general plan. The Land Use Element guides decision makers, planners and the general public as to the ultimate pattern of development within the unincorporated areas of the county. It designates the general distribution, location and extent of land uses, such as housing, business, industry, open space, agriculture, natural resources, recreation, and public/quasi-public uses. The Land Use Element also discusses the standards of residential density and non-residential intensity for the various land use designations.

The Land Use Element governs how land is to be utilized. Many of the issues and policies contained in other plan elements are linked in some degree to this element. For example, the amount, distribution, and timing of growth expressed within the Land Use Element must correlate with the anticipated road capacity and performance standards established in the Circulation Element. Similarly, the location and density of uses prescribed by this Element are integrally linked to policies for the protection of environmental resources included in the Conservation/Open Space Element. This element must establish the ability to provide adequate land use in order to meet regional housing needs. Housing Elements are mandated by State law to be updated every five years, so the General Plan must set the land use context for continued coordinated implementation of subsequent required updates to the Housing Element over the life of this Plan.

Monterey County's Land Use Element establishes policies to designate the general distribution and intensity of residential, commercial, industrial, agricultural, public facilities, and open space uses of the land in the County. The main vision of this Element is to create a general framework that encourages growth within or near developed/developing areas in order to reduce impacts to agricultural production, natural resources, or public services. Areas where development would be encouraged include incorporated cities and designated community areas where existing services are available (*Figure 4, next page*). These areas would be subject to additional levels of planning consisting of city general plans adopted by cities and community plans or specific plans to be adopted by the Board of Supervisors for the community areas. In addition, the Plan designates rural centers where development has started and that will be allowed to develop in a semi-rural character (*Figure 5, next page*).

Monterey County's General Plan consists of policies that apply countywide and policies unique to a specific region. Countywide policies are applicable to the entire unincorporated area and are included within this Land Use Element. More focused policies that address specific regional or local issues are found in Area Plans. The Land Use Maps and land use designation descriptions in this general plan cover all inland, unincorporated, areas of the county. Due to the size of the County, Land Use Maps are divided by Planning Areas and are included as part of this Land Use Element (*Policy LU-1.11*).

Approximately one percent of Monterey County has been developed with residential (0.7%), commercial (0.03%), and industrial (0.3%) uses. Most of this development is concentrated in the northern one-third of the County. Agriculture is the largest land use representing almost 60% of the total land area. The second largest land use consists of public and quasi-public uses (about 28%) such as educational, transportation, and military facilities as well as religious, recreational/cultural and community facilities.

L-11

GOALS AND POLICIES

LAND USE

GENERAL LAND USE

GOAL LU-1

PROMOTE APPROPRIATE AND ORDERLY GROWTH AND DEVELOPMENT WHILE PROTECTING DESIRABLE EXISTING LAND USES.

Policies

LU-1.1 The type, location, timing, and intensity of growth in the unincorporated area shall be managed.

LU-1.2 Premature and scattered development shall be discouraged.

LU-1.3 Balanced development of the County shall be assured by designating adequate land for a range of future land uses.

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. Phasing of development shall be required as necessary in growth areas in order to provide a basis for long-range services and facilities planning.

LU-1.5 Land uses shall be designated to achieve compatibility with adjacent uses.

LU-1.6 Standards and procedures to assure proper levels of review of development siting, design, and landscaping shall be developed.

LU-1.7 Clustering of residential development to those portions of the property which are most suitable for development and where appropriate infrastructure to support that development exists or can be provided shall be strongly encouraged. Lot line adjustments among four lots or fewer, or the re-subdivision of more than four contiguous lots of record that do not increase the total number of lots may be allowed pursuant to this policy without requirement of a general plan amendment.

1 LU-1.8 Voluntary reduction or limitation of development potential in the rural and agricultural areas through dedication of scenic or conservation easements, Transfer of Development Rights (TDR), and other appropriate techniques shall be encouraged. The Transfer of Development Credit (TDC) in the Big Sur Land Use Plan is a separate program to address development within the critical viewshed. A TDR Program shall be established to provide a systematic, consistent, predictable, and quantitative method for decision-makers to evaluate receiver sites in areas of the unincorporated County with priority for locations within

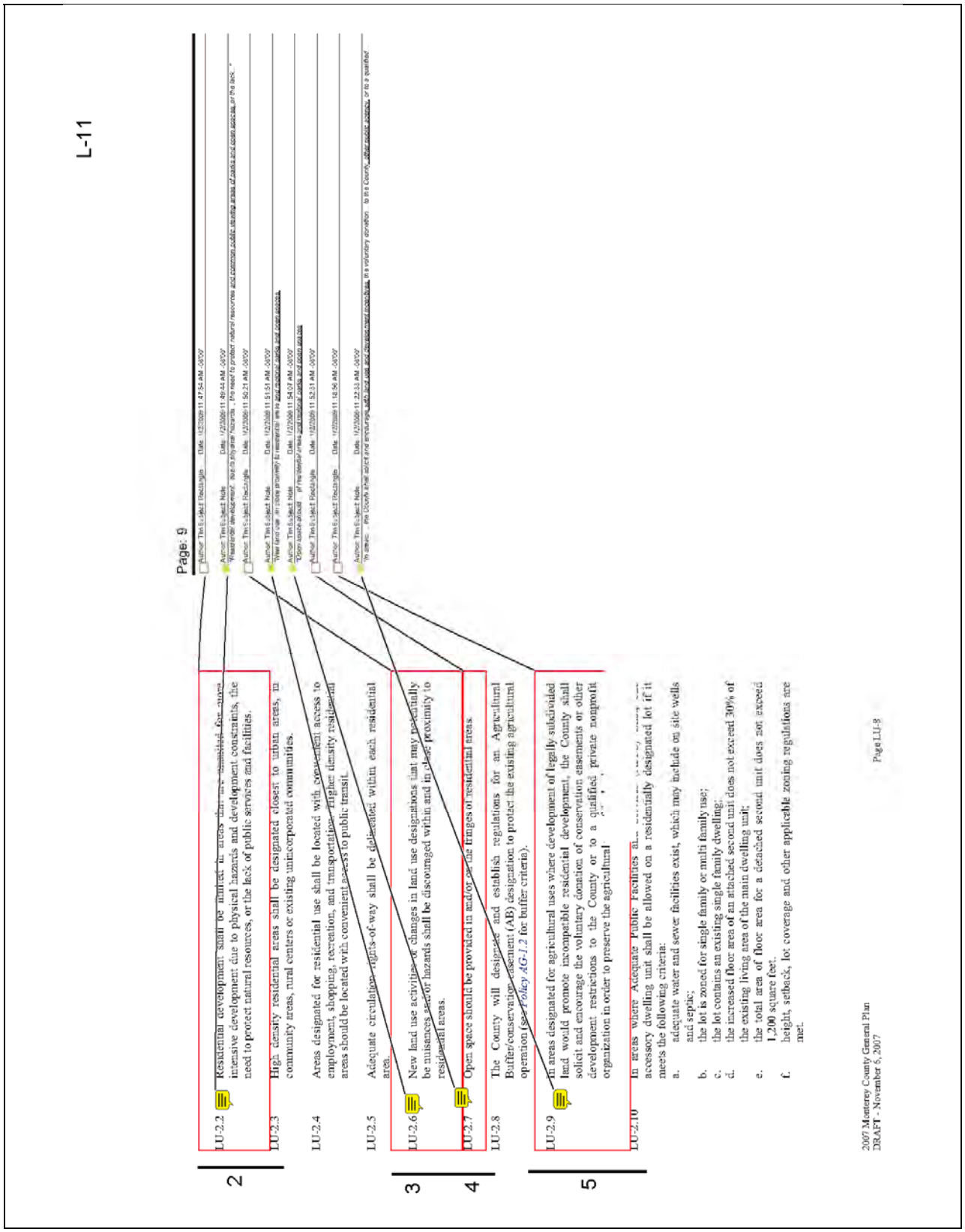
2007 Monterey County General Plan
DRAFT - November 6, 2007

Summary of Comments on Policy LU-9

Page: 5

Author: Tim Subject: Rectangle Date: 1/2/2009 11:43:33 AM -08'00'

Author: Tim Subject: Note Date: 1/2/2009 11:46:50 AM -08'00'
"Voluntary reduction ... and other appropriate techniques shall be solicited and encouraged in cooperation with other public and private conservation agencies and organizations.


L-11
Page: 9
LU-2.2
Residential development shall be limited in areas that are unsuited for such intensive development due to physical hazards and development constraints, the need to protect natural resources, or the lack of public services and facilities.
LU-2.3
High density residential areas shall be designated closest to urban areas, in community areas, rural centers or existing unincorporated communities.
LU-2.4
Areas designated for residential use shall be located with convenient access to employment, shopping, recreation, and transportation. Higher density residential areas should be located with convenient access to public transit.
LU-2.5
Adequate circulation rights-of-way shall be delineated within each residential area.
LU-2.6
New land use activities or changes in land use designations that may potentially be nuisances to or hazards shall be discouraged within and in close proximity to residential areas.
LU-2.7
Open space should be provided in and/or on the fringes of residential areas.
LU-2.8
The County will designate and establish regulations for an Agricultural Buffer/conservation easement (AB) designation to protect the existing agricultural operation (see Policy AG-1.2 for buffer criteria).
LU-2.9
In areas designated for agricultural uses where development of legally subdivided land would promote incompatible residential development, the County shall solicit and encourage the voluntary donation of conservation easements or other development restrictions to the County or to a qualified private nonprofit organization in order to preserve the agricultural
LU-2.10
In areas where Adequate Public Facilities a
accessory dwelling unit shall be allowed on a residentially designated lot if it meets the following criteria:
a. adequate water and sewer facilities exist, which may include on site wells and septic;
b. the lot is zoned for single family or multi family use;
c. the lot contains an existing single family dwelling;
d. the increased floor area of an attached second unit does not exceed 30% of the existing living area of the main dwelling unit;
e. the total area of floor area for a detached second unit does not exceed 1,200 square feet;
f. height, setback, lot coverage and other applicable zoning regulations are met.
2007 Monterey County General Plan
DRAFT - November 6, 2007
Page LU-8
2
3
4
5

L-11

Page: 22

LU-5.9 The proximity of other compatible land uses having similar levels of utility and service requirements shall be considered when designating industrial areas.

PUBLIC/QUASI-PUBLIC

6 **GOAL LU-6**

ENCOURAGE USES ON PUBLIC LANDS THAT ARE COMPATIBLE WITH EXISTING AND PLANNED USES ON ADJACENT LANDS.

Policies

LU-6.1 The *Public Quasi-Public* (PQP) land use designation accommodates publicly or privately owned uses such as schools, parks, regional parks, public works facilities and hospitals that serve the public at large.

LU-6.2 Lands that are owned by a federal, state, or local public agency may be designated as *Public/Quasi Public* (PQP). Regulations for those lands will be established accordingly.

LU-6.3 The County's planning activities shall be coordinated with the planning efforts undertaken by other public agencies with landholdings in Monterey County.

7 LU-6.4 The planning for public lands adjacent to private lands should be undertaken as a joint effort between all of the affected agencies and private property owners.

LU-6.5 In determining the impact of general plan land use designation amendments for land adjacent to military bases, installations, operating training areas, or underlying designated military aviation routes and airspace, information from the military and other sources shall be considered.

WATER BODIES

GOAL LU-7

ENCOURAGE THE USE OF THE COUNTY'S MAJOR INLAND WATER BODIES FOR MULTIPLE PURPOSES SUCH AS WATER SUPPLY, FLOOD CONTROL, AND HYDROELECTRIC GENERATION.

Policies

LU-7.1 Priorities for multiple uses of the major water bodies shall be established. Recreation shall be secondary to water supply, flood control and hydroelectric generation.

2007 Monterey County General Plan
DRAFT - November 6, 2007

Page LU-21

L-11

LU-7.2 Compatibility between multiple uses of major water bodies and surrounding land uses shall be considered.

OPEN SPACE

GOAL LU-8

ENCOURAGE THE PROVISION OF OPEN SPACE LANDS AS PART OF ALL TYPES OF DEVELOPMENT INCLUDING RESIDENTIAL, COMMERCIAL, INDUSTRIAL, AND PUBLIC.

Policies

LU-8.1 The open space needs of the community and new development shall be reviewed and addressed through the planning process.

LU-8.2 Clustering, consistent with the other policies of this Plan, shall be considered as a means of maximizing permanent open space within new development.

LU-8.3 As part of development review and approval, on-site development density credit consistent with the underlying land use designation shall be given for developable lands placed in permanent open space as part of a development. Use of the on-site development density credit will be allowed only if environmental, health and public safety factors permit.

8 LU-8.4 Wherever possible, open space lands provided as part of a development should be integrated into an area-wide open space network.

9 LU-8.5 Development should consider use of open space buffers on the perimeter and integrated into the development.

LU-8.6 Creation of private, nonprofit land trusts and conservation organizations to receive development rights on any lands to be preserved and maintained as open space shall be supported.

GENERAL PLAN CONSISTENCY WITH ZONING

GOAL LU-9

MAINTAIN CONSISTENCY BETWEEN THE GENERAL PLAN AND ITS IMPLEMENTING REGULATIONS.

Policies

LU-9.1 Within three months after adoption of the updated General Plan, the Director of Planning shall bring to the Board of Supervisors for their approval a work

Page: 23

Author: Tim Subject: Rectangle Date: 1/3/2009 10:33:29 AM -08'00'

Author: Tim Subject: Note Date: 1/3/2009 10:37:20 AM -08'00'
"wherever possible... into an area-wide publicly accessable open space network through contiguous lands or inter-connecting trail and conservation easement corridors.

Author: Tim Subject: Rectangle Date: 1/3/2009 10:37:52 AM -08'00'

Author: Tim Subject: Note Date: 1/3/2009 11:26:55 AM -08'00'
"Development should consider ... into the development. When development is adjacent to a public park or open space the buffer shall be at least 1000 feet (reference

L-11

Page: 53

Author: Tim Subject: Rectangle Date: 1/23/2009 12:19:49 PM -08'00'

Author: Tim Subject: Note Date: 1/23/2009 12:22:19 PM -08'00'
"Construction" shall include improved bicycle facilities where the corridor and route are identified in the comprehensive bicycle plan and considered for all other roadways.

WATER TRANSPORTATION

GOAL C-9

TO PROMOTE SAFE, CONVENIENT, AND APPROPRIATE WATER TRANSPORTATION FOR MONTEREY COUNTY.

Policies

C-9.1 Land use activities in the immediate vicinity of harbors shall be compatible with the continued optimum commercial and recreational operations of the harbor.

C-9.2 Plans for significant increases in harbor and adjacent activities shall address environmental and transportation impacts

C-9.3 Any construction or operation of mooring facilities that may pose significant hazards or threats to marine or coastal resources shall be opposed.

BICYCLE TRANSPORTATION

GOAL C-10

PROMOTE A SAFE, CONVENIENT BICYCLE TRANSPORTATION SYSTEM INTEGRATED AS PART OF THE PUBLIC ROADWAY SYSTEM.

Policies

C-10.1 An integrated system of suggested bicycle routes for Monterey County shall be established.

C-10.2 A comprehensive bicycle plan consistent with *Policy C-10.1* shall be coordinated among all appropriate private and public interests and agencies.

10 C-10.3 Construction or expansion of roadways within major transportation corridors shall consider improved bike routes.

C-10.4 The integration of bicycle systems with other public transportation modes shall be promoted.

C-10.5 Bicycling shall be encouraged as a viable transportation mode for visitor-serving areas.

C-10.6 Visitor-serving facilities shall be encouraged to provide adequate and secure bicycle parking facilities.

2007 Monterey County General Plan
DRAFT November 6, 2007

Page CIRC-13

L-11

Page: 54

C-10.7 New and improved multi-modal transfer facilities, such as transit centers and park-and-ride lots, shall include adequate and secure bicycle parking facilities.

11

L-11

Page: 55

The Conservation and Open Space Element guides the County in the long-term conservation and preservation of open space lands and natural resources while protecting private property rights. The County's intent is not to alter existing regional, State or Federal laws and regulations, but rather to enable greater cooperation among public agencies and the public to share management responsibilities in accomplishing the shared goal of conserving and protecting the resources of the region.

This Element incorporates the state-mandated requirements for the Open Space and Conservation Elements and also addresses scenic resources, cultural and historic resources, and energy and mineral resources. Policies regarding natural environmental hazards, such as flooding, are addressed in the Safety Element, and recreational policies are addressed within the Public Services Element.

Among the more prominent features within Monterey County are the Santa Lucia and Gabilan Mountain Ranges, the Salinas and Carmel Valleys, and about 100 miles of coastline. Of special note are such features as the Elkhorn Slough (North County), sandy beaches of Monterey and Carmel Bays, and the rocky shores/cliffs of the Monterey Peninsula and the Big Sur coast.

12

Granite and metamorphic rocks form the Gabilan and Santa Lucia mountains, characterized by steep slopes and complex drainage patterns. The Salinas Valley, although underlain by granite, contains several thousand feet of sediment that have a greater seismic hazard but are the source of productive agricultural soils. Although the County contains useful minerals, the tremendous complex geology caused by extensive faulting and deformation makes investigation difficult and inconclusive.

Plants representative of almost all parts of California (except for the highest mountains and driest deserts) are found in Monterey County. Monterey is the biological center of California; many plant species that find either their northern or southern limits can be found in Monterey County. In addition, a high number of plant species are native only to Monterey County.

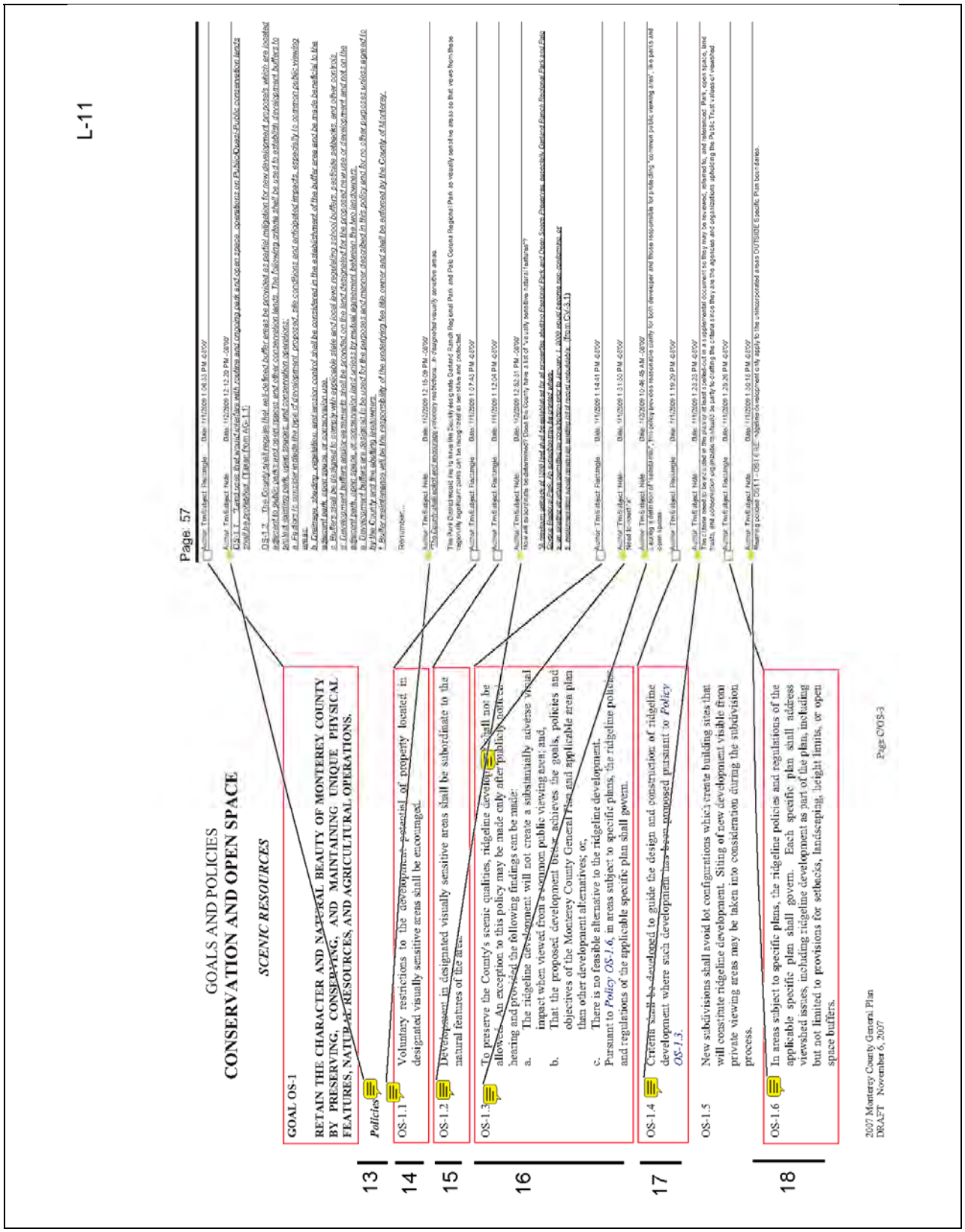
The County's coast offers a wide range of habitats, including sandy beaches, rocky shoreline, kelp beds, estuaries, wetlands, and sub-marine canyons. An abundance of sea life and coastal marine life off of the Monterey County coast is directly related to the variety and quality of habitat. Although a few broad policies are provided in this General Plan, most policies addressing coastal resources are included separately as part of the Local Coastal Program.

The County has recognized the need to discover and identify places of historical and cultural significance and to preserve the physical evidence of its historic past. A countywide historic preservation ordinance is implemented by the Parks Department's Historical Coordinator and Historic Resources Review Board. Policies of this ordinance stress incentives to preserve sites which have proven historical or cultural significance as part of the County's Historic Preservation Plan.

Monterey County, along with the Counties of Santa Cruz and San Benito, lies within the North Central Coast Air Basin. Air quality within this basin is monitored by the Monterey Bay Unified Air Pollution Control District (MBUAPCD). The District maintains three air

2007 Monterey County General Plan
DRAFT November 6, 2007

Page C/OS-1


L-11
Page: 57
GOALS AND POLICIES
CONSERVATION AND OPEN SPACE
SCENIC RESOURCES
GOAL OS-1
RETAIN THE CHARACTER AND NATURAL BEAUTY OF MONTEREY COUNTY BY PRESERVING, CONSERVING, AND MAINTAINING UNIQUE PHYSICAL FEATURES, NATURAL RESOURCES, AND AGRICULTURAL OPERATIONS.
Policies
OS-1.1 Voluntary restrictions to the development essential of property located in designated visually sensitive areas shall be encouraged.
OS-1.2 Development in designated visually sensitive areas shall be subordinate to the natural features of the area.
OS-1.3 To preserve the County's scenic qualities, ridgeline development shall not be allowed. An exception to this policy may be made only after publicly noticed hearing and provided the following findings can be made:
a. The ridgeline development will not create a substantially adverse visual impact when viewed from a common public viewing area; and,
b. That the proposed development better achieves the goals, policies and objectives of the Monterey County General Plan and applicable area plan than other development alternatives; or,
c. There is no feasible alternative to the ridgeline development.
Pursuant to Policy OS-1.6, in areas subject to specific plans, the ridgeline policies and regulations of the applicable specific plan shall govern.
OS-1.4 Criteria shall be developed to guide the design and construction of ridgeline development where such development has been proposed pursuant to Policy OS-1.3.
OS-1.5 New subdivisions shall avoid lot configurations which create building sites that will constitute ridgeline development. Siting of new development visible from private viewing areas may be taken into consideration during the subdivision process.
OS-1.6 In areas subject to specific plans, the ridgeline policies and regulations of the applicable specific plan shall govern. Each specific plan shall address viewshed issues, including ridgeline development as part of the plan, including but not limited to provisions for setbacks, landscaping, height limits, or open space buffers.
2007 Monterey County General Plan
DRAFT November 6, 2007
Page C/OS-3

19

OS-1.7 A voluntary, ~~transfer of development~~ rights program to direct development away from areas with unique visual or natural features, ~~critical habitat~~, or prime agricultural soils shall be established.

20

OS-1.8 Programs to encourage clustering development in rural and agricultural areas to maximize access to infrastructure, protect prime agricultural land, and reduce impacts to designated visually sensitive and critical habitat areas shall be established.

OS-1.9 Development that protects and enhances the County's scenic qualities shall be encouraged. All routine and ongoing agricultural activities are exempt from the viewshed policies of this plan, except as noted in *Policy OS-1.12*.

21

OS-1.10 Recognizing the value of trails in Monterey County, policies to establish a trails program, including bike paths (Class 1), walking and equestrian facilities used by the general public, shall be addressed in each Area Plan within the following parameters:

a. Public lands shall be used as the primary source for establishing non-motorized trails. Cooperation between public agencies and the public in the creation of trails is encouraged.
b. Dedication of public trails or trail easements on private property shall be voluntary except as may be required by State Law.
c. Crop protection and food safety of agricultural crops shall be a primary factor in disallowing trails.
d. Potential new trails on private land or public land are subject to appropriate design including location, screening, safety, reducing potential for trespass onto private property, protection of the public health and safety, and protection of agricultural products.
e. The location and design of trails on public or private land shall be done in consultation with affected public agencies, landowners, and other interested parties.
f. New commercial development and residential subdivisions shall mitigate significant adverse disruption of views from common viewing points on public trails through a variety of strategies including but not limited to the use of appropriate materials, scale, lighting and siting of development. This policy shall not apply to existing residential development or to any agricultural activity or operation.
g. The design and development of the Monterey Bay Sanctuary/Scenic Trail is exempt from this policy.

OS-1.11 Maintain GIS mapping for all lands containing visually sensitive resources and corridors. Mapped information shall be reanalyzed and updated at least every five (5) years, as necessary.

2007 Monterey County General Plan
DRAFT November 6, 2007

Page C/OS-4

Page: 58

Author: TimSubject: Note Date: 1/14/2009 1:36:08 PM -08'00'
Delete the comma

Author: TimSubject: Rectangle Date: 1/14/2009 1:32:51 PM -08'00'

Author: TimSubject: Note Date: 1/14/2009 1:35:15 PM -08'00'
Why not an incentive program to encourage voluntary transfer of development away from ...? This section should also include "common public viewing areas" as one of the listed "areas"

Author: TimSubject: Note Date: 1/2/2009 12:17:01 PM -08'00'
1.2: "Incentive" Programs would be the appropriate language here.
1.9: This policy is stating two distinct intentions; one broad and overarching and the other specific. Separate the first sentence and make it a stand alone policy as 1.7 and renumber, it better fits as the transition between ridgeline policies and scenic policies. The ag lands exception policy can then stand on its own as a distinct intention.

Author: TimSubject: Rectangle Date: 1/14/2009 1:38:45 PM -08'00'

Author: TimSubject: Rectangle Date: 1/14/2009 1:56:49 PM -08'00'

Author: TimSubject: Note Date: 1/14/2009 2:40:41 PM -08'00'
If public trails have a recognized value in Monterey County then why is it nearly impossible under this policy to actually provide any of any value?

(a) What is the intent of segregating motorized and non-motorized trails? Is the County implying that private lands are the primary source for motorized trails?

If any trails program is to have value it is going to have to rely on private lands to connect the public lands that are the primary source of trails. This policy makes that almost impossible. Internally, the policy is unfair: it gives extreme deference to ag-lands without ever defining them. Ag-land owners and protections are given veto opportunity for trails and easements not on ag-lands while the trail users of the county do not have the reciprocal privilege of weighing in on activities on ag-lands that may have an impact on adjacent non ag-land property owners' public interests. the playing field needs definition and leveling.

Suggest changing the second sentence to read: *"Incentives for cooperation between public agencies and private land owners in the creation of connector trails between public access ties will be developed."* Encouragement is meaningless.

(c) The County has already clearly stated that new public trails on private property will be voluntary OS-1.10(b). So it follows that any public trails on private ag-land will be by consent of the owner. The language here is obtuse and subject to broad interpretation. It does not add clarity but instead adds uncertainty. It could be interpreted to apply to all trails throughout the entire county. The language here could be less hostile and more clear by maintaining internal language consistency with, *"Crop protection and food safety guidelines shall be developed to guide the design and location of public trails and trail easements in agriculturally zoned lands."* This is of course based on the presumption that there may be a private ag-land owner who voluntarily supports a public trail or easement on their ag-zoned land (OS-1.10(b). Otherwise, if the intent of the policy is to prevent any trails or easements from ever being dedicated in ag-zoned land in the county then the language could be less obtuse and clearly state that, *"Dedication of public trails or trail easements will not be allowed in agriculturally zoned private lands without the consent of the property owner, except as may be required by State Law.* If adjacent ag-land owners oppose their ag-land neighbor's support for a public trail or easement then that conflict is addressed in OS-1.10(d)(e).

(d) Public and private do not need to be separated here; the issue is the trail and not whether it is on public or private land. *"Potential new trails are subject to appropriate design..."*

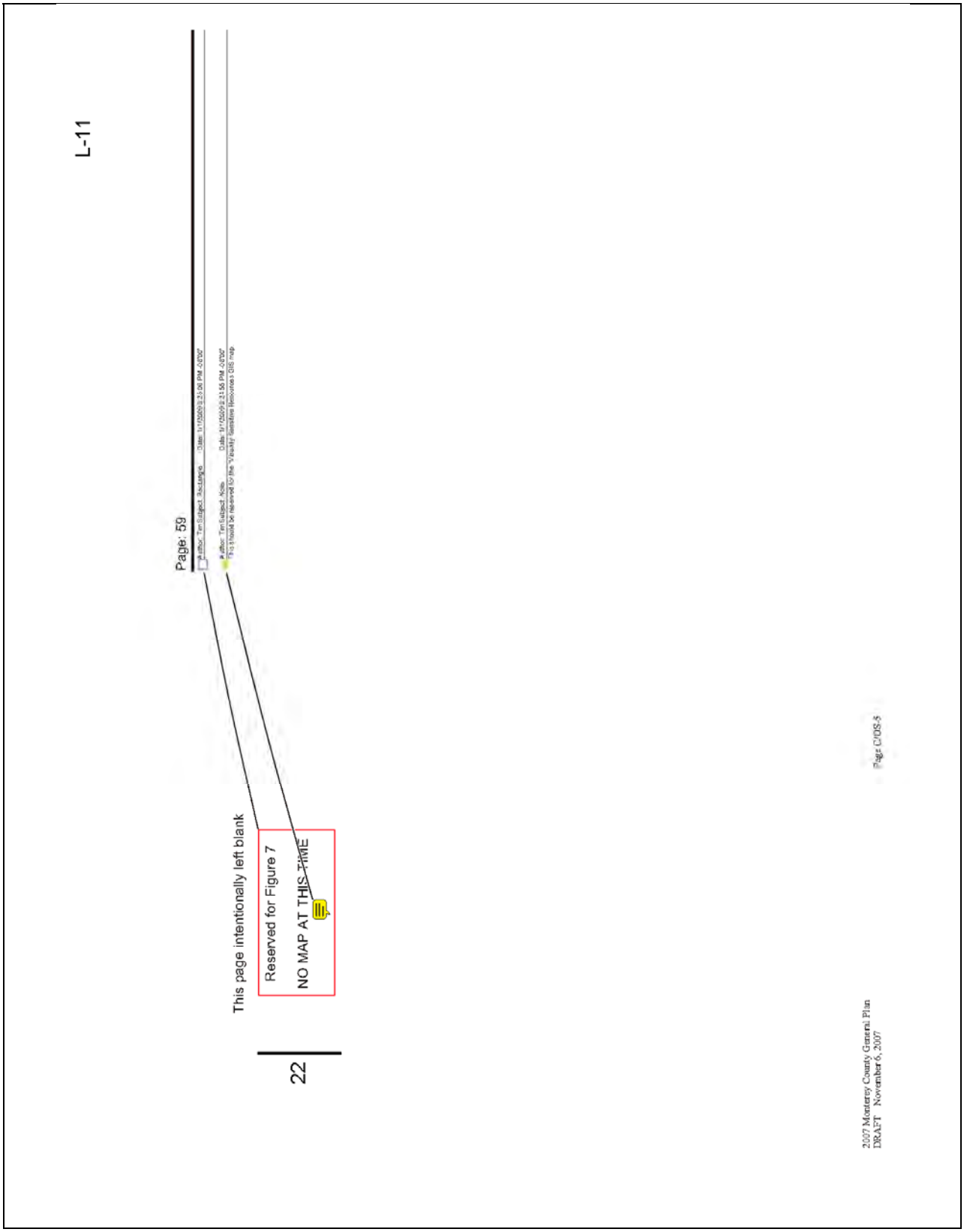
(e) See (d), above. *"The location and design of trails shall be done..."*

(f) This policy omits the reality of existing commercial and residential re-development and is too obtuse on the agricultural issue. Suggest: *"New commercial and residential development (by definition this includes subdivisions) and existing commercial and residential re-development shall mitigate ... This policy shall not apply to ... any agricultural activity or operation on zoned agricultural land."*

(g) This exemption should also include the Elkhorn a Coastal Trail, all new side-paths associated with a County or State road way improvement project.

Author: TimSubject: Note Date: 1/14/2009 1:57:01 PM -08'00'
delete the comma and add "and"

L-11


Page: 59
Author: Tim Subject: Attachment Date: 1/17/2009 3:35:06 PM -0700
Author: Tim Subject: Note Date: 1/17/2009 3:11:55 PM -0700
This should be reserved for the "Visually Sensitive Resources GIS map
This page intentionally left blank
Reserved for Figure 7
NO MAP AT THIS TIME
22
2007 Monterey County General Plan
DRAFT November 6, 2007
Page C/OS-5

L-11

23

OS-1.13 The significant disruption of views from designated scenic routes shall be mitigated through use of appropriate materials, scale, lighting and siting of development. Routine and On-going Agricultural activities shall be exempt from this policy, except:

1. large-scale agricultural processing facilities, or
2. facilities governed by the Agricultural Winery Corridor Plan

Page: 60

Author: Tim Subject: Rectangle Date: 11/1/2009 3:24:32 PM -08'00'

Author: Tim Subject: Note Date: 11/3/2009 10:54:58 AM -08'00'
This is internally inconsistent and should read as: *"The significant disruption of views from common public viewing areas shall be mitigated..."*

The County should include criteria such as a certain disruption percent of view based on a baseline view from known "common public viewing areas". Subsequent visual analysis can then easily compute a percent impact to view and measure it against whatever threshold is established for "significant". This will give the County an objective criteria to measure against.

The second sentence should be more specific: "Routine ... activities on agriculturally zoned land shall be exempt..."
(1) Large-scale should be defined; perhaps by square-footage or percent land cover or some other measurable criteria and not left so obtuse.

Author: Tim Subject: Note Date: 11/1/2009 3:35:57 PM -08'00'
Lower case, "on-going"

Author: Tim Subject: Note Date: 11/1/2009 3:36:46 PM -08'00'
Lower case, "agricultural"

Author: Tim Subject: Note Date: 11/2/2009 10:59:38 AM -08'00'
OS-2.5 *Mineral extraction and mining operations on Public/Quasi-Public lands shall not be permitted.*

Author: Tim Subject: Rectangle Date: 11/2/2009 10:57:14 AM -08'00'

MINERAL RESOURCES

GOAL OS-2

PROVIDE FOR THE CONSERVATION, UTILIZATION, AND DEVELOPMENT OF THE COUNTY'S MINERAL RESOURCES.

Policies

OS-2.1 Potentially significant mineral deposits and existing mining operations identified through the State Division of Mines and Geology, including idle and reserve properties, shall be protected from on-site and off-site land uses that would be incompatible with mineral extraction activities.

OS-2.2 Mineral extraction operations shall be in keeping with sound conservation practices consistent with the Surface Mining and Reclamation Act (SMARA) and other applicable standards and adequate financial security shall be required to insure reclamation of the extraction site to a condition consistent with the surrounding natural landscape and environmental setting.

OS-2.3 Efforts to conserve raw mineral resources through recycling shall be supported.

OS-2.4 Lands containing known valuable mineral deposits shall be mapped in the County GIS system. Mapped information shall be updated as needed.

OS-2.5 The County shall inventory, assess, and characterize the location and condition of identified pre-SMARA abandoned gold, mercury and coal mines and implement such measures as may be necessary to ensure that such mines do not contribute to a significant risk to public health or safety or non-compliance with water quality standards and criteria.

24

SOILS

GOAL OS-3

PREVENT SOIL EROSION TO CONSERVE SOILS AND ENHANCE WATER QUALITY

L-11

CARMEL VALLEY MASTER PLAN
SUPPLEMENTAL POLICIES

1.0 - Land Use

CV-1.1 Policies relative to the Carmel Valley Area are intended to retain a rural character.

CV-1.2 When an ownership is covered by two or more land use designations, the total allowable development should be permitted to be located on the most appropriate portion of the property.

25

CV-1.3 Open space uses shall be located between the development areas in order to clearly define them and maintain a distinction between the more rural and more suburban areas of the valley. Small and large open space areas should be created with preference given to those that add open space to existing open space areas.

CV-1.4 Existing higher intensity residential and recreational uses in the Valley are intended to be recognized by this Plan.

CV-1.5 In the residential areas, maximum densities are as shown on the Carmel Valley Master Plan Land Use Map. However, attainment of maximum density in these areas is dependent upon conformity of the proposed project to plan goals and policies.

CV-1.6 New residential subdivision in Carmel Valley shall be limited to creation of 266 new lots with preference to projects including at least 50% affordable housing units. The County shall develop a tracking system and shall present an annual report before the Planning Commission.

CV-1.7 Subdivision for conservation purposes which is in the public interest is exempt from any quota and allocation system where such subdivision does not create additional residential building sites. It is preferable that parcels thus created shall be owned by an appropriate public entity or a non-profit public benefit corporation.

CV-1.8 Cluster development:

a. must meet the objectives of the Master Plan.
b. shall be used to protect visible open space in sensitive visual areas or to protect natural resources.
c. Clustering adjacent to vertical forms, although preferable to development in open spaces, will be considered in light of the visual sensitivity of the building site.
d. should be consistent with wastewater application rates of the Carmel Valley Wastewater Study that generally would require clustering of five units or less on a minimum of five acres of land.

2007 Monterey County General Plan
DRAFT - November 6, 2007 Page, CVMP-1

Page: 74

Author: Tim Subject: Rectangle Date: [illegible]

Author: Tim Subject: Rectangle Date: [illegible]

L-11

Page: 75

Author: Tim Subject: Rectangle Date: 1/13/2009 3:51:23 PM -08'00'

Author: Tim Subject: Note Date: 1/30/2009 12:27:18 PM -08'00'
Garland Ranch Regional Park is the most significant public viewing area in the entire Specific Plan and needs to be recognized and protected as such; "Structures proposed in open grassland areas that would be highly visible from Carmel Valley Road, Laureles Grade, or Garland Ranch Regional Park shall..."

e. may be permitted only where it will result in the preservation of visible open space and is in compliance with other applicable policies.
f. Open space for clustered developments shall be dedicated in perpetuity.

26

CV-1.9 Structures proposed in open grassland areas that would be highly visible from Carmel Valley Road and Laureles Grade shall be minimized in number and be clustered near existing natural or man-made vertical features.

CV-1.10 The Val Verde Drive area is planned for residential use at a basic density of one (1) unit per acre. With suitable clustering, up to two (2) units per acre may be allowed. However, a density of up to four (4) units per acre may be allowed provided that 25% of the units are developed for individuals of low and moderate income or for workforce housing. This policy is intended to be independent from *Policy CV-1.11*, and not counted in conjunction with the density bonus identified in that policy.

CV-1.11 Projects for low or moderate income family housing shall be exempt from any annual allocation provisions, but shall be subtracted from the 20-year buildout quota on a basis of one such unit reducing the remaining buildout by one unit. Projects for senior citizens of low or moderate income may have up to twice the number of units normally allowed on a site. Such increased density shall only be allowed where it is determined to be feasible and consistent with other plan policies. Such projects shall be subtracted from the 20-year buildout quota on a basis of two such units reducing the remaining buildout by one unit.

CV-1.12 Areas designated for commercial development in the valley shall:
a. be placed in design control overlay districts ("D"),
b. have planted landscaping covering no less than 10% of the site, and
c. provide adequate parking.

CV-1.13 To preserve the character of the village, commercially designated lots in Carmel Valley shall not be used for exclusive residential purposes.

CV-1.14 Provision should be made for service centers in Carmel Valley. They shall be limited to urbanized areas such as the mouth of the Valley, Carmel Valley Village or mid-Valley area. Sites shall meet the following criteria:
a. Low visibility
b. Safe and unobtrusive access away from pedestrian traffic areas
c. Low noise impact on surrounding uses
d. Conform to all other Plan requirements

Service centers shall be limited to those enterprises which provide services and facilities for persons engaged in the construction, maintenance and repair trades and not allow enterprises whose chief business is on-site retail sales.

L-11

Page: 76

CV-1.15 Visitor accommodation uses shall follow the following guidelines:

a. Expansion of existing hotels, motels and lodges should be favored over the development of new projects.
b. Visitor accommodation projects must be designed so that they respect the privacy and rural residential character of adjoining properties.
c. Bed and breakfast facilities shall be counted as visitor accommodation units and be limited to a maximum of five (5) units clustered on five (5) acres in accord with Monterey County Code *Section 15.20.060.M* unless sewered by public sewers.

CV-1.16 Applications for service and special use facilities (including in Carmel Valley, Hidden Valley Music Seminars), as defined by the General Plan, are to be considered on their merits and shall not automatically be deemed inconsistent with the Plan. They must, however, conform to all applicable plan policies.

CV-1.17 Publicly used buildings and areas should be encouraged to be oriented to views of the river.

CV-1.18 Facilities classified as either Public/Quasi-Public or Special Use (such as schools, churches, hospitals, convalescent homes, rehabilitation centers, hospice facilities, emergency facilities and public facilities such as community halls) may be considered in any land use category provided that they meet the following criteria:

a. Low visibility.
b. Safe and unobtrusive access away from pedestrian traffic areas.
c. Low noise impact on surrounding uses.
d. Development should follow a rural architectural theme with design review.
e. Conform to all other Plan requirements.

27

CV-1.19 Mines or quarries shall:

a. be screened from public view by use of natural terrain, vegetation, or artificial screening compatible with the environment;
b. have safe and unobtrusive access;
c. minimize noise impact on surrounding areas; and
d. conform to all other Plan requirements except the restriction on development on slopes over 30% within the limits of quarry operations.

CV-1.20 Design ("D") and site control ("S") overlay district designations shall be applied to the Carmel Valley area. Design review for all new development throughout the Valley, including proposals for existing lots of record, utilities, heavy commercial and visitor accommodations but excluding minor additions to existing development where those changes are not conspicuous from outside of the property shall consider the following guidelines:

a. Proposed development encourages and furthers the letter and spirit of the Master Plan.

L-11

Page: 77

Author: Tim Subject: Note Date: 1/13/2009 4:03:43 PM -08'00'
Delete the ellipse.

Author: Tim Subject: Note Date: 1/2/2009 12:29:06 PM -08'00'
Delete the ellipse.

b. Development either shall be visually compatible with the character of the valley and immediate surrounding areas or shall enhance the quality of areas that have been degraded by existing development.
c. Materials and colors used in construction shall be selected for compatibility with the structural system of the building and with the appearance of the building's natural and man-made surroundings.
d. Structures should be controlled in height and bulk in order to retain an appropriate scale.
e. Development, including road cuts as well as structures, should be located in a manner that minimizes disruption of views from existing homes.
f. Minimize erosion and/or modification of landforms.
g. Minimize grading through the use of step and pole foundations.

CV-1.21 Commercial projects shall meet the following guidelines:
a. Buildings shall be limited to 35 feet in height and shall have mechanical apparatus adequately screened, especially on the roofs.
b. Commercial projects shall include landscaping that incorporates large-growing street trees. Parking areas shall be screened with exclusive use of native plants or compatible plant materials. Land sculpturing should be used where appropriate.

28

CV-1.22 Special Treatment Area: Carmel Valley Ranch – The Carmel Valley Ranch shall be designated as a "Special Treatment Area." The Amended Carmel Valley Ranch Specific Plan, dated 11/3/76, is incorporated by reference into this Plan and the provisions of this Specific Plan shall continue to apply. However, attainment of densities authorized by this Specific Plan is dependent upon conditions existing at the time each future increment of development is sought and is further dependent upon conformity with the Specific Plan Amended Conditions of Approval as well as the goals and policies of this General Plan, whichever is most restrictive. Any amendment of the Specific Plan must be consistent with the policies and provisions of this General Plan. APNs 416-522-020-000 and 416-522-017-000)

CV-1.23 Special Treatment Area: Condon/Chugach Property – The Condon/Chugach property shall be designated as a Special Treatment Area. In recognition of the unique circumstances of the property, including the past gift conveyances of several hundred acres to Garland Park, the Condon/Chugach property shall be allowed to be subdivided into four parcels consistent with the 2004 Subdivision Ordinance Standards. (approximately 51 acres; APN's 189-111-022 and 189-111-024)

CV-1.24 The property located between the end of Center Street and north of the Carmel River within the mid-valley area shall be retained as one building site (APN: 169-131-024, 169-131-025).

L-11

Page: 78

Author: Tim Subject: Note Date: 1/12/2009 12:29:25 PM -08'00'
CV-1.28: Special Treatment Area: Oakland Ranch Regional Park -
Monterey Peninsula Regional Park District would like to discuss "Special Treatment Area" status for Oakland Ranch Regional Park.
Author: Tim Subject: Rectangle Date: 1/1/2009 4:09:48 PM -08'00'
Author: Tim Subject: Note Date: 1/1/2009 4:11:09 PM -08'00'
Trails need to be addressed in this section.
Author: Tim Subject: Rectangle Date: 1/1/2009 4:10:35 PM -08'00'

CV-1.25 Special Treatment Area: Rancho San Carlos - Residential development is permitted on the portions of the Santa Lucia Preserve (formerly Rancho San Carlos) within the Greater Monterey Peninsula Planning Area, and shall follow densities and policies as specified in Board of Supervisor *Resolution No. 93-115*, "Comprehensive Planned Use" Overlay for Rancho San Carlos and the Comprehensive Development Plan for the Santa Lucia Preserve (See also *Policy GMP-1.6*).

CV-1.26 Study Area: Gardiner/Tennis Club - The County shall establish a study area near the Carmel Valley Village where there is a mix of visitor serving uses. A Study will be performed to evaluate the potential for development in light of the environmental conditions of the area (traffic, water quantity, water quality, wastewater disposal). If deemed appropriate and resource constraints have been resolved, the County may establish a Special Treatment Area and adopt specific land use policies that would apply to new development. (APNs: 189-121-001-000, 189-201-003-000, 189-201-013-000, 189-251-014-000, 189-251-015-000, 189-251-016-000, 189-252-002-000, 189-261-001-000, 189-261-005-000, 189-261-006-000, 189-261-009-000, 189-261-010-000, 189-261-011-000, 189-261-012-000, 189-261-013-000, 189-261-015-000, 189-261-016-000, and 189-261-017-000).

CV-1.27 Special Treatment Area: Rancho Canada Village – Approximately 40 acres consisting of properties located generally between Val Verde Drive and the Rancho Canada Golf Course clubhouse, from the Carmel River to Carmel Valley Road, excluding portions of properties in floodplain shall be designated as a Special Treatment Area. Residential development may be allowed with a density of up to 10 units/acre in this area and shall provide a minimum of 50% Affordable/Workforce Housing. Prior to beginning new residential development (excluding the first unit on an existing lot of record), projects must address environmental resource constraints (e.g.; water, traffic, flooding). (APN: 015-162-017-000, 015-162-025-000, 015-162-026-000, 015-162-039-000 and 015-162-040-000)

2.0 - Circulation

CV-2.1 Public transit should be explored as an alternative to the use of private automobiles and to help preserve air quality. Whenever feasible all new development shall include a road system adequate not only for its internally generated automobile traffic but also for bus (both transit and school), pedestrian, and bicycle traffic, which should logically pass through or be generated by the development.

CV-2.2 Consideration should be given to locating a County road and utility maintenance facility in the Carmel Valley area. Such facility would provide for storage of equipment as well as materials.

L-11

Page: 82

Author: Tim Subject: Rectangle Date: 3/12/2009 4:13:45 PM -08'00'

Author: Tim Subject: Note Date: 3/12/2009 12:31:33 PM -08'00'
"A minimum setback of 100 feet shall be established...Carmel Valley Road. A minimum setback of 1000 feet shall be established for all properties abutting Garland Ranch Regional Park. An exception may be granted..."

Author: Tim Subject: Rectangle Date: 3/12/2009 4:12:57 PM -08'00'

Author: Tim Subject: Note Date: 3/12/2009 4:13:20 PM -08'00'
Exception

3.0 - Conservation/Open Space

31

CV-3.1 A minimum setback of 100 feet shall be established for all properties abutting Carmel Valley Road. An exception may be granted in cases where:

a. an existing structure permitted for construction prior to adoption of the original Carmel Valley Master Plan (December 16, 1986) would become non-conforming, or

b. implementation would render an existing lot of record unbuildable.

CV-3.2 Public vista areas shall be provided and improved.

32

CV-3.3 Development (including buildings, fences, signs and landscaping) shall not be allowed to significantly block views of the viewshed, the river or the distant hills as seen from key public viewing areas such as Garland Ranch Regional Park, along Carmel Valley Road, and along Laureles Grade Road. This policy applies to commercial and private parcels including existing lots of record. Removal of existing solid fences and rows of Monterey Pine trees which block views of the river and the mountains shall be encouraged.

CV-3.4 Alteration of hillsides and natural landforms caused by cutting, filling, grading or vegetation removal shall be minimized through sensitive siting and design of all improvements and maximum feasible restoration including botanically appropriate landscaping. Where cut and fill is unavoidable on steep slopes, disturbed areas shall be revegetated.

CV-3.5 Signs should be low-key and shall not be allowed to block views, cause visual clutter, or detract from the natural beauty. Commercial signs shall not be constructed of plastic or be internally lighted. Neon signs shall not be permitted where visible from the street.

CV-3.6 No off-site outdoor advertising is allowed in the Plan area.

CV-3.7 Areas of biological significance shall be identified and preserved as open space. These include, but are not limited to:

a. The redwood community of Robinson Canyon;
b. The riparian community and redwood community of Garzas Creek;
c. All wetlands, including marshes, seeps and springs (restricted occurrence, sensitivity, outstanding wildlife value).
d. Native bunchgrass stands and natural meadows (restricted occurrence and sensitivity).
e. Cliffs, rock outcrops and unusual geologic substrates (restricted occurrence).
f. Ridgelines and wildlife migration routes (wildlife value).

When a parcel cannot be developed because of this policy, a low-density, clustered development (but no subdivision) may be approved on those portions of

2007 Monterey County General Plan
DRAFT - November 6, 2007

Page, CVMP-8

L-11

Page: 84

Author: Tim Subject: Rectangle Date: 11/1/2009 4:20:12 PM -08'00'

Author: Tim Subject: Note Date: 11/1/2009 4:23:22 PM -08'00'

"Public and ... Monterey Peninsula Regional Park District ... may acquire ... biological, agricultural, land, or other ..."

CV-3.12 Open space areas should include a diversity of habitats with special protection given to areas where one habitat grades into another (these ecotones are ecologically important zones) and areas used by wildlife for access routes to water or feeding grounds.

CV-3.13 Historic and Archaeological Resources, including buildings and sites of historical significance, located in Carmel Valley shall:

a. be reviewed on a site by site basis.
b. be rezoned to the "HR" District as a condition of permit approval for any development impacting such sites.
c. require preservation of the integrity of historic sites and/or structures.

A committee to evaluate the current condition of each and recommend deletions, additions or other measures shall be drawn from members of local historical, architectural, and/or educational societies as determined by the Planning Commission.

CV-3.14 Wherever possible a network of shortcut trails and bike paths should interconnect neighborhoods, developments and roads. These should be closed to motor vehicles and their intent is to facilitate movement within the Valley without the use of automobiles.

33

CV-3.15 Public and private agencies such as the Big Sur Land Trust, the Monterey Regional Park District and others may acquire development rights and/or accept easements and dedications for significant areas of biological, agricultural or other open space land.

CV-3.16 Lighting for outdoor sports shall not be allowed where it would be visible from off-site.

CV-3.17 Street lighting shall be designed to promote traffic safety and be unobtrusive and harmonious with the local character. Such lighting must be constructed and located to illuminate only the intended area and prevent off-site glare.

CV-3.18 Except where inconsistent with sound environmental planning, new aboveground transmission facilities shall incorporate the following design guidelines:

a. follow the least visible route (e.g., canyons, tree rows, and ravines),
b. cross ridgelines at the most visually unobtrusive locations,
c. follow, not compete with, either natural features of the terrain or man-made features in developed areas,
d. Create a simple and unobtrusive in appearance,
e. minimize the bulk of structures,
f. use the minimum number of elements permitted by good engineering practice, and
g. incorporate colors and materials compatible with local surroundings.

2007 Monterey County General Plan
DRAFT - November 6, 2007

Page, CVMP-11

L-11

Page: 85

Author: Tim Subject: Note Date: 1/1/2008 4:24:49 PM -08'00'

Delete comma

34 CV-3.19 As development of bike paths and a coordinated, area-wide trails system are essential for circulation, safety and recreation in the Carmel Valley Planning Area, dedication of trail easements may be required as a condition of development approval, notwithstanding *Policy OS-1.10(b)*.

4.0 - Safety

CV-4.1 In order to reduce potential erosion or rapid runoff:

a. The amount of land cleared at any one time shall be limited to the area that can be developed during one construction season.

b. Motorized vehicles shall be prohibited on the banks or in the bed of the Carmel River, except by permit from the Water Management District or Monterey County.

c. Native vegetative cover must be maintained on areas that have the following combination of soils and slope:

1. Santa Lucia shaly clay loam, 30-50% slope (SfF)
2. Santa Lucia-Reliz Association, 30-75% slope (Sg)
3. Cieneba fine gravelly sandy loam, 30-70% slope (CcG)
4. San Andreas fine sandy loam, 30-75% slope (ScG)
5. Sheridan coarse sandy loam, 30-75% slope (SoG)
6. Junipero-Sur complex, 50-85% slope (Jc)

CV-4.2 A comprehensive drainage maintenance program should be established by either sub-basins or valley-wide watershed zones.

CV-4.3 In addition to required on-site improvements for development projects, a fee shall be imposed to help finance the improvement and maintenance of the drainage facilities identified in the Master Drainage Plan for Carmel Valley.

CV-4.4 The County shall require emergency road connections as necessary to provide controlled emergency access as determined by appropriate emergency service agencies (Fire Department, OES). The County shall coordinate with the emergency service agencies to periodically update the list of such connections.

5.0 - Public Services

CV-5.1 Pumping from the Carmel River aquifer shall be managed in a manner consistent with the Carmel River Management Program. All beneficial uses of the total water resources of the Carmel River and its tributaries shall be considered and provided for in planning decisions.

CV-5.2 Water projects designed to address future growth in the Carmel Valley may be supported.

CV-5.3 Development shall incorporate designs with water reclamation, conservation, and new source production in order to:

L-11

Page: 92

Author: Tim Subject: Note Date: 1/1/2009 4:55:02 PM -08'00'
(3) Establish a network of riding, bicycling, and walking trails that interconnect the villages, educational facilities, neighborhoods, and conservation lands.

Author: Tim Subject: Rectangle Date: 1/1/2009 4:52:21 PM -08'00'

COUNTY OF MONTEREY
FORT ORD MASTER PLAN
LAND USE ELEMENT

The Fort Ord Land Use Element is part of the Greater Monterey Peninsula Area Plan and the Monterey County General Plan and consists of those portions of the County of Monterey Land Use Concept (Figure 1) adopted by the Fort Ord Reuse Authority (FORA) on June 13, 1997, that pertain to the areas of Fort Ord currently under the jurisdiction of the County and located east of Highway 1, and includes the following text. The Land Use Element contains land use designations specific to Fort Ord. These land use designations are consistent with the land use designations (as base designations) included in the adopted FORA Reuse Plan. For each of the Planning Districts, overlay designations are included that provide additional description and clarification of the intended land uses and additional design objectives for that specific Planning District. The Fort Ord land use designations also include the applicable land use Goals, Objectives, Policies and Programs directly from the Reuse Plan. These will constitute all the policies and programs to be applied to the Fort Ord Land Use Element. Background information, land use framework and context discussions, as they relate to the subject area are hereby incorporated by reference into the Fort Ord Land Use Element from the FORA adopted Reuse Plan. In addition, the Land Use Map contained in this plan is the County of Monterey Land Use Concept (Figure 1) adopted by FORA into the Reuse Plan.

Land Use Goal: Promote orderly, well-planned, and balanced development to ensure educational, housing and economic opportunities as well as environmental protection.

35

Design Principals:

1. Create a unique identity for the community around the educational institutions.
2. Reinforce the natural landscape setting consistent with the Monterey Peninsula character.
3. Establish a mixed-use development pattern with villages as focal points.
4. Establish diverse neighborhoods as the building blocks of the community.
5. Encourage sustainable practices and environmental conservation.
6. Support the adoption of Regional Urban Design Guidelines by FORA.
7. Create an appropriate range of housing types attainable to the residents and workers of Monterey County.

L-11

Page: 94

Author: Tim Subject: Note Date: 1/1/2009 5:04:31 PM -08'00'
This is the only designation to state, "...not prohibited by..." How about, "The Open Space Recreation Base Designation allows public parks and recreation activities, habitat protection and management, public amphitheaters, environmental education facilities, trails, and limited commercial recreation and recreation-based convenience retail.

Author: Tim Subject: Rectangle Date: 1/1/2009 4:56:48 PM -08'00'

Business Park/Light Industrial. The Business Park/Light Industrial Base Designation allows business parks, light industrial uses, professional office, research and development uses, convenience retail, and food service establishments. Commercial recreation and visitor serving uses are allowed as designated in the overlay designations.

Visitor Serving. The Visitor Serving Base Designation allows hotels and resorts, conference centers, restaurants, commercial recreation, and retail support uses.

36

Open Space/Recreation. The Open Space Recreation Base Designation allows public parks and recreation activities not prohibited by overlay designations, habitat management, public amphitheaters, environmental education facilities, and commercial recreation. Convenience retail is allowed as designated in the overlay designations.

Habitat Management. The Habitat Management Base Designation allows habitat management, ecological restoration, environmental educational activities and facilities, and passive recreational activities, such as hiking, bike riding, horse riding, and picnicking in accordance with adopted habitat plans.

School/University. The School/University Base Designation allows public primary and higher educational facilities, habitat management, environmental education and support uses such as offices, sport facilities, maintenance uses, university housing, and convenience retail.

Public Facility/Institutional. The Public Facility/Institutional Base Designation allows facilities having public institutional ownership or benefit. Such uses may include habitat management, light industrial and R&D, corporation and maintenance yards, public utilities, training grounds, offices, educational facilities, and youth camps.

Military Enclave. The Military Enclave Base Designation is for lands retained by the United States armed forces for on-going military-related activities.

DESCRIPTION OF PLANNING AREAS AND OVERLAY PLANNING DISTRICTS

The following descriptions of the Planning Areas and Planning Districts are compatible with and consistent with those contained in the adopted Reuse Plan. The location and boundaries of the Planning Areas and Planning Districts are found in Figure 2. In some cases the descriptions of future development have been simplified and clarified, particularly if a Planning District is subject to a Master Plan or Habitat Plan to be adopted and implemented by another agency. In addition, General Development Character and Design Objectives from the adopted Reuse Plan have been supplemented for the East Garrison, University Corporate Center, and Parker Flats Planning Districts to provide a more refined development vision for those areas as guidance in preparing the required Specific Plans or other appropriate planned development mechanism.

L-11

Page: 155

Author: Tim Subject: Note Date: 1/1/2009 5:14:32 PM -08'00'
Needs to address community recreational and connectivity trails here. Also, bicycle paths and side-paths, especially along the Hwy 68 corridor (and proposed new highway), Laureles Grade and Corral de Tierra/San Benancio need to be added here.

Author: Tim Subject: Rectangle Date: 1/1/2009 5:06:46 PM -08'00'

TORO AREA PLAN
SUPPLEMENTAL POLICIES

1.0 - Land Use

T-1.1 Development proposals on Corral de Tierra Road from "Four Corners" to Corral del Cielo shall complete safety improvements concurrently with development.

T-1.2 Industrial land uses other than utilities shall not be permitted in the Toro area.

T-1.3 The designated agricultural lands as shown on the Toro Area Plan Land Use Map (*Figure LU10*) shall be conserved and, where feasible, expanded.

T-1.4 Special Treatment Area: Greco - The Greco property on River Road across from the Indian Springs Ranch Subdivision shall be designated as a "special treatment" area to be zoned Heavy Commercial. Although the use of the property for the removal of sand and gravel ceased in the year 2000, use of the property for a contractor's yard, shop, and residence may continue pursuant to PLN980448 as approved August 29, 2001 or as that permit may be amended or extended. (APN: 139-021-005-000)

T-1.5 Subdivision shall be designed so that new lots have building sites located outside of the critical viewshed.

T-1.6 Existing legal lots of record located in the critical viewshed may transfer density from the acreage within the critical viewshed to other contiguous portions of land under the same ownership, provided the resulting development meets all other Toro Area and General Plan policies.

T-1.7 Development on properties with residential land use designations located within the Toro Area Plan along the Highway 68 corridor shall be limited to the first single family home on a legal lot of record. The County shall conduct a comprehensive review of infrastructure constraints regarding circulation, wastewater, and water supply. Said restriction shall not apply to development within adopted Community Areas, Rural Centers, or Affordable Housing Overlays.

37

2.0 - Circulation

T-2.1 Employers in surrounding areas should be encouraged to stagger employees' work hours in order to ease peak hour traffic congestion on Highway 68 and in other areas.

T-2.2 Davis and Reservation Roads shall be encouraged as alternate routes between the Monterey Peninsula and Salinas to alleviate traffic on Highway 68.

L-11

Page: 158

Author: Tim Subject: Rectangle Date: 1/1/2009 5:15:02 PM -08'00'

Author: Tim Subject: Note Date: 1/1/2009 5:16:00 PM -08'00'
Planned...Except for driveways, pedestrian walkways, and bike paths.

Author: Tim Subject: Rectangle Date: 1/1/2009 5:16:24 PM -08'00'

Author: Tim Subject: Note Date: 1/1/2009 5:22:56 PM -08'00'
Large acreage...shall be preserved and enhanced for grazing, where grazing is found to be a viable use. Where grazing is not economically viable but historically established, incentives for philanthropic with public agencies and/or private land conservation organizations will be established to preserve grazing on the land.

38

39

T-3.2 Land use, architectural, and landscaping controls shall be applied and sensitive site design encouraged to preserve Toro's visually sensitive areas and scenic entrances:
a. River Road/Highway 68 intersection; and
b. Laureles Grade scenic vista overlooking the Planning Area.

T-3.3 Portions of County and State designated scenic routes shall be designated as critical viewshed as shown on the Toro Visual Sensitivity Map. Except for driveways, pedestrian walkways and paths, a 100-foot building setback shall be required on all lots adjacent to these routes to provide open space and landscape buffers. This setback may be reduced for existing lots of record that have no developable area outside the setback and to accommodate additions to existing structures that become non-conforming due to this policy. New development shall dedicate open space easements over set back areas established by this policy.

T-3.4 Placement of existing utility lines underground shall be encourged, particularly along Laureles Grade Road, Corral de Tierra, San Benancio, River Road, and Highway 68.

T-3.5 Exterior/Outdoor lighting shall be located, designed and enforced to minimize light sources and preserve the quality of darkness. Street lighting shall be as unobtrusive as practicable and shall be consistent in intensity throughout the Toro area.

T-3.6 Large acreages in higher elevations and on steeper slopes shall be preserved and enhanced for grazing, where grazing is found to be a viable use.

T-3.7 The preservation of oak trees within Toro Area Plan shall be promoted by discouraging removal of healthy trees with diameters in excess of 6 inches d.b.h.

4.0 - Safety

T-4.1 Land uses and practices that may contribute to significant increases of siltation, erosion, and flooding in the Toro area shall be prohibited.

5.0 - Public Services

T-5.1 To ensure cost-effective and adequate levels of wastewater treatment, the County shall promote relatively higher densities in areas where wastewater treatment facilities can be made available.

6.0 - Agriculture

No supplemental Agricultural policies at this time.

L-11

Page: 160

GREATER MONTEREY PENINSULA AREA PLAN
SUPPLEMENTAL POLICIES

1.0 - Land Use

GMP-1.1 The County shall overlay properties north and south of Highway 68 and west of Laureles Grade with a Visually Sensitive District ("VS") and/or other appropriate zoning designation to regulate the location, height and design of structures within this unique scenic corridor.

40 GMP-1.2 The undeveloped portion of *High Meadow I* (APNs: 015-451 to 045 and APNs: 015-461-001 to 017) shall receive density credit for the open space originally dedicated as part of the entire *High Meadow I* development approval not to exceed a total of 18 units.

GMP-1.3 Bed and breakfast uses may be considered in any land use category provided that such use is compatible with existing land uses in the area.

GMP-1.4 Development proposals should include compatible open space uses located between other developed areas in order to maintain a rural atmosphere and to protect scenic resources.

41 GMP-1.5 Open space, low intensity educational and recreational uses should be considered to be appropriate and compatible land uses in environmentally sensitive areas and areas of high visual sensitivity.

GMP-1.6 Special Treatment Area: Rancho San Carlos - Residential development is permitted on the portions of the Santa Lucia Preserve (formerly Rancho San Carlos) within the Greater Monterey Peninsula Planning Area, and shall follow densities and policies as specified in Board of Supervisor Resolution No. 93-115, "Comprehensive Planned Use" Overlay for Rancho San Carlos and the Comprehensive Development Plan for the Santa Lucia Preserve (See also *Policy CV-1.25*).

GMP-1.7 Special Treatment Area: White Rock Club - The White Rock Club shall be designated as a "Special Treatment Area." The following specific policies shall regulate uses within the White Rock Club Special Treatment Area. Development shall be subject to the policies of the Rural Grazing land use designation. (APN: 417-041-014-000)

a. The existing recreational facilities, consisting of 100 cabin sites and one gatehouse, allows the construction and remodeling of the existing 100 cabin sites. No additional cabin sites shall be allowed.
b. Conversion of the cabins to permanent residential units shall not be permitted. The purpose of the cabins is transient recreational use, however, no more than eight of the 100 cabin sites may be occupied year round for the maintenance and operations of White Rock Club.

2007 Monterey County General Plan
DRAFT - November 6, 2007

Page, GMP-1

L-11

c. Further expansion of accessory uses at White Rock Club may be granted upon approval of a Use Permit. The Use Permit shall conform to the policies of the Rural Grazing land use designation.

GMP-1.8 Special Treatment Area: San Clemente Ranch - The San Clemente Ranch shall be designated as a "Special Treatment Area." The following specific policies shall regulate uses within the San Clemente Ranch Special Treatment Area. Development shall be subject to the policies for the Rural Grazing land use designation.

a. The existing recreational facilities, consisting of 101 cabin sites, 5 permanent residents, tennis courts, swimming pool and fishing ponds are allowed uses. No additional cabin sites shall be allowed. Cabin sites may be moved only with consent of the Hearing Officer subject to consistency with the policies of this Plan. The reconstruction, remodeling or rebuilding of approved cabins or development of new cabins on approved cabin sites shall be allowed, with appropriate Planning and Building Inspection Department and Health Department permits.
b. Further expansion of accessory uses, not including cabins, is subject to the requirements of Rural Grazing land use designation.
c. Conversion of the 101 cabins to permanent residential units shall not be permitted. The use of the cabins shall remain a recreational use, and occupancy shall be limited to no more than 45 consecutive days.
d. Agricultural uses on the property shall be allowed.

GMP-1.9 Special Treatment Area: Jefferson: Residential development shall be permitted at the maximum equivalent density of 2.5 acres per unit on 40 acres (16 units total) in order to contribute to meeting the affordable housing goals on the peninsula (APN: 175-011-047-000, 175-011-029-000, 414-014-014-000). The following specific policies shall regulate uses within the Jefferson Special Treatment Area:

a. Development shall meet minimum setback requirements and provide adequate buffers from the Marina landfill.
b. Development shall meet all requirements of the Marina Airport Comprehensive Land Use Plan (CLUP) and letter from the Airport Land Use Commission (ALUC) to the Board of Supervisors dated December 20, 2006. Proposed development shall be considered by the ALUC prior to approval.
c A minimum of 50-percent (50%) of the units developed on this site shall meet Affordable/Workforce Housing criteria.
d Future development will address environmental constraints.
e. Development may occur on the bluffs above the Salinas Valley floor. No new residential development may occur on prime valley farmland.

(also see *Policy GS-1.12*)

42

Page: 161

Author: Tim Subject: Note Date: 1/2/2009 10:51:15 AM -08'00'
GMP-1.10 Special Treatment Area: [illegible] Regional Park:
The Park District would like special [treatment] area status and discuss what that means.

Author: Tim Subject: Rectangle Date: 1/1/2009 4:32:31 PM -08'00'

2007 Monterey County General Plan
DRAFT - November 6, 2007

Page: GMP-2

L-11

Page: 162

Author: Tim Subject: Note Date: 1/12/2009 4:35:43 PM -08'00'
Trails and side-paths need to be addressed here

Author: Tim Subject: Rectangle Date: 1/12/2009 4:34:48 PM -08'00'

43

2.0 - Circulation

GMP-2.1 Improvement of Highway 68 intersections, construction of alternate passing lanes, public transit roadway improvements, and improved bicycle safety measures shall be given priority for funding.

GMP-2.2 Employers should stagger employee work hours in order to ease peak hour traffic congestion on Highway 68 and in other areas.

GMP-2.3 Improvements to Laureles Grade should consist of the construction of shoulder widening, spot realignments, passing lanes and/or paved turn-outs. Heavy vehicles should be discouraged from using this route.

GMP-2.4 To minimize traffic safety hazards, creation of new direct access points from single-family residences onto Highway 68 or Laureles Grade shall be prohibited, unless there is no other feasible access.

GMP-2.5 The County shall promote the use of Davis and Reservation Roads as alternate routes between the Monterey Peninsula and Salinas to alleviate traffic on Highway 68.

GMP-2.6 State Scenic Highway designation should be pursued for Highway 1 north of the Highway 68 junction, and County Scenic Route designations should be pursued for Carmel Valley Road, Robinson Canyon Road and Reservation Road.

GMP-2.7 New sites for office employment, services, and local conveniences should incorporate designs and be located to allow use of alternate modes of transportation such as public transit buses, bicycles and walking. Features to encourage the use of public transit should include a road system sufficient to allow reasonable access by transit buses and should also include provision for bus pullouts, bus stops, pedestrian access, wheel chair access, transit information signs and passenger shelters.

GMP-2.8 Development directly beneath runway approaches of the Monterey Peninsula Airport and Marina Municipal Airport shall:

a. be of low intensity,
b. not generate electrical interference to radio communication between pilots and the air traffic control tower,
c. not contain sources of glare which would blind or confuse pilots and, and
d. be required to grant aviation easements to the Monterey Peninsula Airport District or other appropriate entity as a condition of development approval.

L-11

Page: 163

GMP-2.9 Construction and expansion of all highways and major arterials should provide for bike paths. It is desirable that bike paths be physically separate from motorized traffic.

GMP-2.10 Work with the United States Coast Guard to assure that sea lanes for tanker traffic off the Monterey County coast are well outside the three-mile limit in order to protect the entire shoreline from possible spills or coincidental pumping of bilges.

5.0 - Conservation/Open Space

44 GMP-3.1 The County shall encourage creative public and private efforts to restore the scenic beauty of visually impacted areas.

GMP-3.2 Development on canyon edges and hilltops shall be designed to minimize the visual impact of the development.

GMP-3.3 The Greater Monterey Peninsula Scenic Highway Corridor and Visual Sensitivity Map (*Figure 14*, next page) shall be used to designate visually "sensitive" and "highly sensitive" areas generally visible from designated Scenic Highways. The following policies shall apply to areas that have one of these designations:

a. All areas designated as "sensitive" or "highly sensitive" shall be interpreted within the meaning of this policy and are to be protected.
b. Landowners will be encouraged to dedicate scenic easements to an appropriate agency or non-profit organization over portions of their land shown as "sensitive" or "highly sensitive" on the Map.
c. Areas shown as "highly sensitive" on the Map should be preserved as open space to the maximum extent possible through scenic easements or, if necessary, fee acquisition.
d. New development should not be sited on those portions of property which have been mapped as "highly sensitive." Where exceptions are appropriate to maximize the goals, objectives and policies of this plan, development shall be sited in a manner which minimizes visible effects of proposed structures and roads to the greatest extent possible and shall utilize landscape screening and other techniques to achieve maximum protection of the visual resource.
e. New development to be located in areas mapped as "sensitive" or "highly sensitive" and which will be visible from a designated scenic route shall maintain the visual character of the area. In order to adequately mitigate the visual impacts of development in such areas, the following shall be required:

L-11

Page: 166

Author: Tim Subject: Rectangle Date: 1/1/2009 4:43:53 PM -08'00'

Author: Tim Subject: Note Date: 1/1/2009 4:49:37 PM -08'00'

(riding, bicycling, and hiking trails should ...

(e) a Carmel River Parkway Trail within and connecting State Park property at Carmel River State Beach and Carmel Hill (Hatton Canyon) with Palo Corona Regional Park and Jacks Peak County Park and the lower Carmel River.

GMP-3.9 Critical habitat areas should be preserved as open space. When an entire parcel cannot be developed because of this policy a low intensity, clustered development may be approved. However, the development should be located on those portions of the land least biologically significant so that the development will not upset the natural function of the surrounding ecosystem.

GMP-3.10 Work with appropriate state and federal agencies to ensure that oil transport activities near the Monterey County coast include adequate procedures to protect marine bird and mammal (particularly sea otter) populations and to clean up oil spills.

45

GMP-3.11 Riding and hiking trails should be acquired and developed with the intent of creating a coordinated, area-wide trails system. All motorized vehicles shall be prohibited from using these trails. In supporting a coordinated area-wide trails system, the highest priority should be given to establishing the following trails systems:

a) a permanent riding and hiking trail from Roach Canyon to Jacks Peak Park;
b) an easterly ridgeline trail from Jacks Peak Park to Laureles Grade;
c) a major trail link which generally traverses in a southeasterly direction from Carmel Valley and forms a trail connection with the Los Padres National Forest trail system; and
d) a connection trail from the Jacks Peak Park/Laureles Grade ridgeline trail to the entrance of Laguna Seca Recreation Area to be used as a point of departure to Toro Regional Park along Highway 68.

GMP-3.12 The County, through the Parks Department, shall address the following fundamental elements with regard to trail acquisition, development and use as expeditiously as possible:

a) design standards,
b) trail location,
c) construction standards,
d) liability questions,
e) patrol and enforcement,
f) restrictions or limitations on types of use appropriate to specific trails or trail segments,
g) maintenance and operation plan, and
h) burden of cost.

GMP-3.13 As development of bike paths and a coordinated, area-wide trails system are essential for circulation, safety and recreation in the Greater Monterey Peninsula Planning Area, dedication of trail easements may be required as a condition of development approval, notwithstanding *Policy OS-1.10(b)*.

L-12

MONTEREY PENINSULA
WATER MANAGEMENT DISTRICT

5 HARRIS COURT, BLDG. G
POST OFFICE BOX 85
MONTEREY, CA 93942-0085 • (831) 658-5600
FAX (831) 644-9560 • http://www.mpwmd.dst.ca.us

February 12, 2009

Carl Holm, Project Manager
Monterey County Resource Management Agency
Planning Department
168 West Alisal Street, Second Floor
Salinas, CA 93901

SUBJECT: Comments on 2007 Monterey County General Plan Draft EIR

Dear Mr. Holm:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the 2007 Monterey County General Plan Update project (State Clearinghouse Number 2007121001/County file # PLN070525). The Monterey Peninsula Water Management District's (MPWMD or District) comments are as follows.

Specific Comments

Page 4.3-11, fourth bullet: The text indicates that MPWMD is currently evaluating the feasibility of a desalination plant in Sand City, which would take 15 million gallons per day (mgd) of saline groundwater from the coastal beachfront and produce 7.5 mgd of potable water. This text should be updated to reflect the fact that MPWMD is no longer investigating the feasibility of a desalination plant in Sand City, but is investigating the feasibility of a desalination facility in the former Fort Ord area, north of Sand City. Specifically, the District is investigating the feasibility of a feedwater system extracting water from the shallow dunes sands on Fort Ord State Park. The expected yield of a desalination facility in this location, if feasible, will be determined as part of the current investigation. 1

Page 4.3-11, second paragraph: The tributaries to Tularcitos Creek should be "Chupines and Rana Creeks", not Choppiness and Rana Creeks. 2

Page 4.3-14, third bullet: The text should be revised as suggested above. Also, in the first paragraph, the last sentence should read "In 2006, Cal-Am obtained …", not Calm obtained. 3

Page 4.3-31, Table 4.3-4: For the Fort Ord "Community Area", the Seaside Groundwater Basin Watermaster should be included under the "Management Authority" heading, "WPWMD" should be "MPWMD", and Cal-Am should be included under the "Water Supplier" heading. Also, the text in the third paragraph regarding the District's current desalination investigations should be revised as suggested above. 4

L-12

Carl Holm, Project Manager
Monterey County Resource Management Agency - Planning Department
February 12, 2009
Page 2

Page 4.3-36, first paragraph: The fourth sentence should read "Total usable storage in the Coastal Subarea of the Seaside Groundwater Basin is estimated to be approximately 7,500 acre-feet". 5

Page 4.3-36, second paragraph: The first sentence should read "Because of a 1995 State Water Resources Control Board Order (Order No. WR 95-10) that ruled Cal-Am did not have a legal right to roughly 70% of the surface and groundwater it was presently diverting from the Carmel River and underlying Carmel Valley Alluvial Aquifer (refer to Carmel River Conflicts) …". The fifth sentence should read "The judgment requires a 10% decrease in operating yield for the basin every three years beginning in Water Year 2009, unless replenishment supplies are secured or groundwater levels are sufficient to prevent seawater intrusion". The last sentence should read " The watermaster adopted the *Seaside Monitoring and Management Program* in 2006, as directed by the court."; the *Monitoring and Management Program* did not implement any decreases. 6

Page 4.3-38, fifth paragraph: The last sentence should read "The primary water supplier in the Carmel River Basin is Cal-Am, an investor-owned public utility that provides water to approximately 40,000 connections within the MPWMD". 7

Page 4.3-39, fourth paragraph: The second sentence should read "As a result, Cal-Am was charged by the State Water Resources Control Board with diverting water from the Carmel River and underlying aquifer unlawfully (Order 95-10, as amended by Orders 98-04 and 2002-0002)." The third sentence should be revised to reflect the fact that Order 2001-04 was rescinded in March 2002 by Order 2002-0002 and is not in effect. 8

Page 4.3-40, second paragraph: The second sentence should be revised to read "The State Water Resources Control Board granted ten temporary permits to MPWMD to allow diversions of water from the Carmel River between December and May for the years 1998 through 2007. In November 2007, the State Water Resources Control Board issued a permanent permit to MPWMD and Cal-Am to allow diversions of up to 2,426 acre-feet of water from the Carmel River between December and May". The last sentence should be revised to read "Under the proposed operational plan, the maximum extraction would be approximately 1,500 AFY, leaving a portion of the injected water in the Seaside Basin available for recovery during extended dry periods". 9

Page 4.3-46, fourth paragraph: The third sentence should be revised to read "The order further established an interim annual production goal of no more than 11,285 AFY from Carmel River sources and directed Cal-Am to secure permits for its unauthorized water use (10,730 AFY) …". The order recognized that Cal-Am had valid rights for its authorized diversions from the Carmel River, i.e., 3,376 AFY. 10

L-12

Carl Holm, Project Manager
Monterey County Resource Management Agency - Planning Department
February 12, 2009
Page 3

Page 4.3-47, third bullet: The requirement that Cal-Am cease withdrawals of water from San Clemente Reservoir and reduce diversions from production wells in the Upper Carmel Valley during low-flow periods of the year, except during an emergency was specified in Order 2002-0002, not Order 98-04. See following paragraph in text. 11

Page 4.3-47, third paragraph: The first sentence should be revised to read "In addition, because of growing concerns regarding the sustainable yield of the Seaside Groundwater Basin and the threat of seawater intrusion, Cal-Am filed a lawsuit to adjudicate the pumping and storage rights of the various groundwater pumpers in the Seaside Basin". Cal-Am's lawsuit was not filed in response to a SWRCB Order. In addition, it should be noted that 5,600 AFY is the amount of recent basin pumping, and is not 500 AFY less than the recent pumping maximum. 12

The second sentence should be revised to read "In a final ruling on March 27, 2006, the Court directed that current pumping in the basin, i.e., 5,600 AFY, be reduced by 10% every three years unless replenishment supplies are secured. Under the ruling, Cal-Am, which is the major pumper in the basin, is responsible for approximately 92% of the reduction in pumping".

Page 4.3-65, last paragraph: The first sentence should be revised to read "The MPWMD began the process of preparing a long-term *Seaside Basin Groundwater Management Plan* following AB 3030 guidelines in March 2004. This effort was superseded by the Seaside Basin adjudication proceedings and decision that was issued in March 2006". 13

Page 4.3-130, first paragraph: In addressing the environmental impact on water resources in the Monterey Peninsula area during the 2030 planning horizon, the document proposes a general mitigation measure:

WR-1: Support a Regional Solution for the Monterey Peninsula in addition to the Coastal Water Project,

and indicates that the draft 2007 General Plan will be revised to include a new policy: 14

PS-3.16 The County will participate in the Water for Monterey County Coalition , or similar regional group, for the purpose of identifying and supporting a variety of new water supply projects, water management programs, and multiple agency agreements that will provide additional domestic water supplies for the Monterey Peninsula and Seaside basin, while continuing to protect the Salinas and Pajaro River groundwater basins from saltwater intrusion. The County's general objective, while recognizing that timeframes will be dependent upon the dynamics of the regional group, will be to complete the cooperative planning of these water supply alternatives within five years of the adoption of the general plan and to implement the selected alternatives within five years after that time.

L-12

Carl Holm, Project Manager
Monterey County Resource Management Agency - Planning Department
February 12, 2009
Page 4

Mitigation Measure WR-1 lacks specificity and is inadequate. To be considered adequate, a mitigation measure should be a specific, feasible action that will actually improve adverse environmental conditions and should be measurable to allow monitoring of its implementation. Mitigation measures consisting only of further studies, or consultation with regulatory agencies that are not tied to a specific action should be avoided. The proposed mitigation measure should specify who is responsible for its implementation, how the measure will be implemented and when it will be implemented. 14

Section 4.9.4.3 page 52, Regulatory Framework, Local Policies and Regulations: Please include a reference to MPWMD Rule 124 concerning Carmel River Management and Regulations. This rule requires that property owners obtain a valid River Work Permit issued by MPWMD for any work within the riparian corridor, which is defined as within 25 lineal feet of the 10-year flood waterline defined by the Nolte and Associates analysis for the 1984 Flood Insurance Study for Monterey County. The following link describes MPWMD's Rules and Regulations regarding River Work Permits: http://www.mpwmd.dst.ca.us/programs/river/CARMEL_RIVER_MGT_RULES.htm. 15

Other Comments:

Control of Runoff from Developed Areas In the Water Resources section of the DEIR (Section 4.3), there is a description of the alteration of drainage patterns associated with the 2030 horizon and build out. MPWMD recommends that consideration be given to collection of runoff from developments that now discharge to open river channels. These discharges are, in effect, unnatural tributaries that cause localized destabilization of streambanks and permanent loss of riparian vegetation. Collection of this type of runoff would reduce the potential for streambank erosion and loss of riparian vegetation. 16

In addition, the Water Resources section talks about water quality being impacted by runoff associated with development. All development projects should consider using pervious pavement and other techniques to promote infiltration.

Care of Riparian Vegetation
In Carmel Valley, it is the responsibility of property owners to maintain in good condition the riparian areas of their property. With increased water use and development, irrigation and maintenance of the riparian corridor will need to continue, especially during times of drought, reduced streamflow, and lowered groundwater levels. The groundwater table in normal to dry years is annually drawn down below the root zone of riparian trees. Therefore, irrigation is necessary to maintain healthy riparian vegetation as long as this condition continues. 17

If you have any questions regarding these comments, you may contact Andy Bell, MPWMD District Engineer, at 658-5620 or andy@mpwmd.dst.ca.us.

L-12

Carl Holm, Project Manager
Monterey County Resource Management Agency - Planning Department
February 12, 2009
Page 5

Control of Runoff from Developed Areas In the Water Resources section of the DEIR (Section 4.3), there is a description of the alteration of drainage patterns associated with the 2030 horizon and build out. MPWMD recommends that consideration be given to collection of runoff from developments that now discharge to open river channels. These discharges are, in effect, unnatural tributaries that cause localized destabilization of streambanks and permanent loss of riparian vegetation. Collection of this type of runoff would reduce the potential for streambank erosion and loss of riparian vegetation. 18

In addition, the Water Resources section talks about water quality being impacted by runoff associated with development. All development projects should consider using pervious pavement and other techniques to promote infiltration.

Care of Riparian Vegetation
In Carmel Valley, it is the responsibility of property owners to maintain in good condition the riparian areas of their property. With increased water use and development, irrigation and maintenance of the riparian corridor will need to continue, especially during times of drought, reduced streamflow, and lowered groundwater levels. The groundwater table in normal to dry years is annually drawn down below the root zone of riparian trees. Therefore, irrigation is necessary to maintain healthy riparian vegetation as long as this condition continues. 19

Sincerely,

Darby Fuerst
General Manager

U:\Darby\wp\Agencies\mcpd\comments_2007 general plan_deir_12feb09.doc

L-13

MST
MONTEREY-SALINAS TRANSIT

JOINT POWERS AGENCY MEMBERS:
City of Carmel-by-the-Sea • City of Del Rey Oaks • City of Marina • City of Monterey • City of Pacific Grove
City of Salinas • City of Seaside • County of Monterey • City of Gonzales (ex. officio)

October 24, 2008

Carl Holm
Assistant Director
County of Monterey
168 W. Alisal Street, 2nd Floor
Salinas CA 93901

Dear Mr. Holm:

Thank you for the opportunity to provide comments on the GPU draft EIR. Please amend the EIR document, Sections 4.6.2.3 and 4.6.2.8, to reflect the latest changes with MST services.

4.6.2.3 Tourism Traffic

Tourism is the county's second largest industry, and the continued expansion of the tourism industry in Monterey County will further exacerbate this source of impact. Present alternatives to the automobile are not attractive to casual weekend travelers or to long-distance tourists. Although visitors comprise a high percentage of commercial airline passengers arriving at Monterey Peninsula Airport (62 percent, according to a 1996 AMBAG study), the relatively low number of airline trips in and out of the Peninsula accounts for only a very small percentage of the annual tourist volume. Monterey-Salinas Transit's popular MST Trolley service is an example of a non-impact transportation mode specifically tailored to tourist demand. Line 22 is another bus route that is tailored to tourist demand as it serves the Big Sur coastline with a limited number of daily roundtrips year around. MST's Line 24 Carmel Valley Grapevine Express also is attractive with visitors and provides a safe alternative to driving between wine tasting venues while reducing congestion on Carmel Valley Road. 1

4.6.2.8 Public Transit Services

The Monterey-Salinas Transit (MST) system is an inter-city and intra-city bus service. MST serves a 280 square-mile area of Monterey County, Southern Santa Cruz County, and Santa Clara County. Intercity bus service is provided between Monterey-Salinas, Watsonville-Salinas, Watsonville-Marina, Monterey-San Jose, and Salinas-King City. Intra-city service is provided by in Carmel, Gonzales, Greenfield, King City, Marina, Monterey, Pacific Grove, Salinas, Seaside and Soledad. MST offers 37 routes 2

One Ryan Ranch Road • Monterey, California 93940-5795 USA • Fax 831.899.3954 • Phone 831.899.2555 or 424.7695
www.mst.org • e-mail: mst@mst.org

L-13

that serve an estimated 352,000 people residing within three-quarters of a mile from a fixed-route bus line. Three MST bus routes connect with Santa Cruz Metropolitan Transit District buses at the Watsonville Transit Center. One MST route offers daily express service to cities in southern Santa Clara County as well as downtown San Jose and provides convenient connections to Santa Clara Valley Transportation Authority (VTA) bus and light rail transit lines. This express route serves Diridon Station in San Jose with direct connections to AMTRAK, Altamont Commuter Express (ACE), as well as CALTRAIN commuter rail service. MST's rural service is provided to Carmel Valley and to Big Sur as well as to unincorporated areas of the county such as Castroville, Prunedale and Chualar. The MST Trolley offers locals and tourists service to popular tourist destinations within the City of Monterey.

Monterey County's paratransit program, MST RIDES, provides transportation for individuals with disabilities who are unable to use MST's regular fixed route transit services. The MST RIDES program also provides RIDES Special Transportation (RIDES ST) service for persons living outside of the ADA-required service corridor (up to three-quarters mile from any MST fixed route bus line). MST RIDES serves 14 municipalities in two counties and 10 additional communities in the unincorporated area of Monterey County. Service coverage spans the Monterey Peninsula, Salinas Valley and the Watsonville Transit Center in Santa Cruz County. As of October 2008, there are 3,171 people certified as ADA Paratransit eligible within the service area. About one half of that population resides in either Monterey or Salinas. The MST RIDES ST service area includes the unincorporated areas of Prunedale, Castroville, and Aromas for North Monterey County as well as the area along River Road from State Hwy 68 to, and including, Las Palmas Ranch II. The MST RIDES ST service area extends one mile on either side of Highway 101 from Salinas to Bradley including the unincorporated communities of San Lucas and San Ardo for South Monterey County. MST RIDES ST services are provided when MST RIDES and MST's regular bus services are in operation. Table 4.6-7 lists each of MST bus route. Exhibit 4.6.3 shows MST bus routes in Monterey County. 2

If you have any questions regarding these changes, please do not hesitate to contact me.

Sincerely,

Michael Gallant
Planning Manager

L-14

Calderon, Vanessa A. x5186

From: Linda G. McIntyre [mcintyre@mosslandingharbor.dst.ca.us]
Sent: Wednesday, December 31, 2008 11:59 AM
To: ceqacomments
Subject: Water Transportation

Hi Carl – I'm not sure how critical it is to have accurate information on this one little tiny paragraph but will provide you with my info and you can decide:

Paragraph 4.6.2.11 Water Transportation. The info included in the second paragraph may apply to Monterey Harbor and may be accurate for them, but as for Moss Landing Harbor, a more accurate statement would be: "Most slip sizes are readily available with little or no waiting at Moss Landing Harbor". 1

Happy New Year and thanks, Carl!

- Linda G.

Linda G. McIntyre, Esq.
General Manager/Harbormaster
Moss Landing Harbor District
7881 Sandholdt Road
Moss Landing, CA 95039
Office: 831.633.5417
Fax : 831.633.4537
Cell : 831.970.3346
mcintyre@mosslandingharbor.dst.ca.us

01/05/2009

L-15

Roger C. Antón, Jr.
Superintendent
superintendent@salinas.k12.ca.us

Nina Van Cleave
Administrative Assistant
nvancleave@salinas.k12.ca.us

SALINAS UNION HIGH SCHOOL DISTRICT

Tim Vanoli
Associate Superintendent/
Instructional Services
tvanoli@salinas.k12.ca.us

Alejandro Hogan
Associate Superintendent/
Human Resources
ahogan@salinas.k12.ca.us

James A. Earhart
Associate Superintendent/
CBO
jearhart@salinas.k12.ca.us

October 28, 2008

Monterey County
Planning and Building
Inspection Administration

OCT 29 2008

RECEIVED

Carl Holm
Monterey County Planning Department
168 W. Alisal St., 2nd Floor
Salinas, CA 93901

Re: Comments Regarding the "2007 Monterey County General Plan Draft Environmental Impact Report" (Sch. No. 2007121001)

Dear Mr. Holm:

This letter provides comments on behalf of Salinas Union High School District ("District") on the 2007 Monterey County General Plan Draft Environmental Impact Report (Sch. No. 2007121001) dated September 2008 ("DEIR"), prepared by ICF Jones & Stokes.

The DEIR provides an analysis of the environmental impacts of the County of Monterey's ("County") proposed updates to its general plan ("General Plan"). While the DEIR does not analyze the environmental impacts of specific development projects, it does analyze the environmental impacts of the County's general planning document, which guides and governs all future development in the County. Furthermore, according to the DEIR, the County will experience significant population growth between now and 2030 (the General Plan's planning horizon), and continued growth until the County reaches "full buildout" in 2092. The DEIR projects the Monterey County population to grow from 432,600 in 2005 to 602,731 in 2030, and the unincorporated county population to grow from 110,083 in 2005 to 135,375 in 2030 (in spite of city annexations of county property). (DEIR pp. 3-8 – 3-10.) This anticipated population increase of nearly 200,000 residents by the year 2030 will have a major impact on District facilities, and the District hopes to work closely with the County and developers to ensure that this impact is properly mitigated. 1

The District notes that while the DEIR does not analyze the environmental impacts of specific development projects, the General Plan does address the proposed development of up to 1,147 residential units (along with commercial development and a community center) on approximately 671 acres in the Greater Salinas area, known as "Butterfly Village," which may require school sites and/or athletic fields. (General Plan GS-1.) Furthermore, the District understands that the City of Salinas ("City") is also planning large residential developments in the near future. Thus, the population growth

{SR060655.DOC} 1

431 W. Alisal Street, Salinas, CA 93901 • P.O. Box 80800, Salinas, CA 93912
Phone: (831) 796-7000 • Fax: (831) 796-7005 • www.salinas.k12.ca.us

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

anticipated by the DEIR is well on its way, and will need to be appropriately analyzed to ensure that the District can serve the students generated by new development. 1

Senate Bill 50 and CEQA

The District is concerned about language in the DEIR that states that new development is fully mitigated by developer fees paid pursuant to Senate Bill ("S.B.") 50, so that all future development has a "less than significant" impact on District facilities apparently with no further analysis needed. In particular, the District notes the following language in the DEIR:

- In 1998, the California State Legislature enacted SB 50, which made significant amendments to existing State law governing school fees. SB 50 prohibited state or local agencies from imposing school impact mitigation fees, dedications, or other requirements in excess of those provided in the statute. Government Code Section 65995(e) provides that where payment has been made to a school district in accordance with the school fee program that is considered full mitigation of any school impacts. The legislation also prohibits local agencies from denying or conditioning any project (including a general plan) based on the inadequacy of school facilities. (DEIR p. 4.11-10.)
- Impact PSU-3: Development and land use activities contemplated in the 2007 General Plan may result in the need for new or expanded school facilities. (Less-Than-Significant-Impact) (DEIR p. 4.11-19.)
- As discussed above in the regulatory section, Government Code Section 65995(h) provides that payment of development impact fees in accordance with its provisions constitutes "full and complete mitigation of the impacts" of new development. (DEIR p. 4.11-20.)
- Paying school impact fees mitigates the impact of new development on schools under Government Code Section 65995(h). Therefore, the policies of the 2007 General Plan will ensure that this impact will be less-than-significant. (DEIR p. 4.11-20.)
- Development under the 2007 General Plan will result in a less-than-significant effect on schools. Paying school impact fees, as required by state law and proposed Public Services Element policy PS-7.8, mitigates the impact of new development on schools under Government Code Section 65995(h). (DEIR p. 4.11-21.)
- Development under the 2007 General Plan will result in a less-than-significant effect on schools. Paying school impact fees, as required by state law and proposed Public Services Element policy PS-7.8, mitigates the impact of new development on schools under Government Code Section 65995(h). (DEIR p. 4.11-22.) 2

{SR060655.DOC} 2

L-15

The District objects to the concept that S.B. 50 removes the need for full analysis under the California Environmental Quality Act ("CEQA") of the impact of new development on school district facilities.

Environmental Impacts

S.B. 50 does not negate the County's responsibility under CEQA to analyze the environmental impacts of new development. Under CEQA, if a project "may" have a significant effect on the environment, a public agency must prepare an environmental impact report ("EIR"), giving a detailed analysis of all the effects on the environment by a proposed project. (Pub. Res. Code §§21061, 21080, & 21100.) One of the main purposes of the EIR is informational, to "provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment . . . ." (Pub. Res. Code §21061.) This includes impacts on local agencies, including school districts. (See 14 C.C.R. §15382; 14 C.C.R. Appendices G & H.) S.B. 50 does not allow the County to bypass providing this information, regardless of whether the environmental impacts are later mitigated to a level of less-than-significant. However, even though the DEIR projects a population increase of nearly 200,000 by the year 2030, an increase that will clearly have an impact on the District, the DEIR does not analyze the impact of this population increase on the District, and arguably also concludes that no analysis will be necessary in the future.

Mitigation Measures

2

In addition to analyzing the project's environmental impacts, CEQA requires the EIR to analyze possible mitigation measures for all significant environmental impacts. (Pub. Res. Code §21100.) Furthermore, CEQA requires the adoption of mitigation measures necessary to reduce the impact to a level of less-than-significant, unless findings are made that "specific economic, legal, social, technological, or other considerations" makes a mitigation measure "infeasible." (14 C.C.R. §15091; see also Pub. Res. Code §§21002, 21002.1 & 21081; 14 C.C.R §§ 15021 & 15096.) Again, the purpose of this analysis is in part informational, and the infeasibility of a particular mitigation measure does not negate CEQA's requirement that the EIR provide information about the measure and why it is infeasible. (See Pub. Res. Code §21061.)

S.B. 50 does not nullify the need for this mitigation measure analysis. In fact, since developer fees are one possible mitigation measure to address the impact of overcrowding in school districts caused by new development, the EIR should specifically analyze developer fees and determine the amount necessary to mitigate the impact of school overcrowding to a level of less-than-significant. To the extent that S.B. 50 potentially precludes collecting this amount of developer fees, higher fees would be a legally infeasible mitigation measure and the EIR should then state that it is infeasible to collect the developer fees needed to fully mitigate overcrowding, and acknowledge an unmitigated impact on school districts remains. The District notes that, as a practical matter, developer fees are generally insufficient to fully mitigate overcrowding in school district facilities.

{SR060655.DOC} 3

L-15

Moreover, S.B. 50 only regulates mitigation of the impact of school overcrowding. There are many other impacts of new development that are not limited by S.B. 50, and that can and should be fully mitigated. Common examples include the need to widen roads or put in other traffic controls to accommodate the increased flow of traffic (both from students and generally), safety measures to address pedestrian travel to school, and the need to add sound-proofing to offset noise increases from nearby development and resulting traffic.

The DEIR simply states that developer fees will be collected pursuant to S.B. 50. It does not analyze the amount of fees necessary to mitigate school overcrowding. It does not determine whether fees collected pursuant to S.B. 50 are sufficient to mitigate this impact. It does not analyze additional mitigation measures to address impacts other than school facility overcrowding. Furthermore, the DEIR arguably concludes that there will be no need for such analysis in the future, when specific development projects are being analyzed. This analysis is insufficient under CEQA.

Statement of Overriding Considerations

Finally, if the County determines that significant impacts remain even after the imposition of all feasible mitigation measures, such as developer fees under S.B. 50, the County must adopt an applicable statement of overriding consideration. (Pub. Res. Code §§ 21002, 21002.1 & 21081; 14 C.C.R §§ 15021(a)(2), 15091(a) & 15096(g); see Sierra Club v. Gilroy City Council (1990) 222 Cal.App.3d 30.) Thus, the County would have to acknowledge and adopt public findings that, for example, the escalation of timing of the development in question outweighs the public's need for adequate school facilities.

2

The DEIR

The District requests that the County revise the DEIR so that it analyzes the various environmental impacts of new development on the District and determines their level of significance, analyzes potential mitigation measures, and either adopts mitigation measures sufficient to reduce the impacts to a level of less-than-significant or adopts a statement of overriding considerations. If the County is unable to provide detailed analyses of new development at the General Plan level, the DEIR should at least state that such analysis must be provided when environmental analyses are performed for specific projects. Furthermore, any discussion of S.B. 50 in the DEIR should clarify that the bill addresses only adequacy of facilities to accommodate new students, and not other impacts that may directly or indirectly impact schools and the populations they serve.

Alternate Measures to Mitigate Impact of New Development on the District

The District notes that S.B. 50 does not preclude the County from requiring mitigation from developers in addition to developer fees. In fact, the County can assist the District to address the impact of new development in several ways.

{SR060655.DOC} 4

Land Dedication

One legally available mitigation measure would be for the County to consider adopting findings requiring any developer building residential units to dedicate land and/or funding pursuant to Government Code sections 65970 et seq. (all subsequent code sections refer to the Government Code unless otherwise specified), which permit the County to require a developer to dedicate land to a school district. Section 65974 specifically states that "for the purpose of establishing an interim method of providing classroom facilities where overcrowded conditions exist, . . . a city, county, or city and county may, by ordinance, require the dedication of land, or the payment of fees in lieu thereof, or a combination of both, for classroom and related facilities for elementary or high schools as a condition to the approval of a residential development."

A land dedication requirement would be good public planning benefiting all residents of the community, including future residents of new development. As development occurs, land suitable for new school sites grows scarcer. Under sections 65352 and 65352.2, the County has a duty to help plan for adequate services to their residents by ensuring that future sites are set aside for schools. Failure to do so leads to inadequate services, future controversies, and the potential need for a school district to exercise its rights under eminent domain to displace existing residents.

Land dedication under sections 65970, et seq., remains a permissible mitigation measure under sections 65995, et seq., which are cited by the DEIR. Section 65995, subdivision (a), specifically states that "[e]xcept for a fee, charge, dedication, or other requirement authorized under Section 17620 of the Education Code, or pursuant to Chapter 4.7 (commencing with Section 65970), a fee, charge, dedication or other requirement for the construction or reconstruction of school facilities may not be levied . . . ." Section 65995 expressly excludes Chapter 4.7, inclusive of section 65974, from this limitation, thus permitting a county to address conditions of overcrowding in school facilities or inadequately sized school sites by requiring, for example, the dedication of land. 2

Phasing

Another method by which the County can work cooperatively with the District within all legal constraints to ensure adequate school facilities with regard to new development is by requiring development to be phased and not permitted prior to availability of school facilities. Timing development so as to balance the availability of school facilities with new development can significantly aid the District in its attempt to provide for the additional students generated by new development. At the same time, it is not a denial of development.

Cooperative Use

The County and the District can also work together to ensure adequate school facilities to serve the residential units contemplated by new development by entering into a partnership to jointly use school and park land for recreation and educational purposes. It

{SR060655.DOC} 5

is desirable for both public entities to have land set aside for both school and park use so that a single joint use facility of ten or more acres would be available to both the District and residents within new development.

Coordination with District to Mitigate Impact of New Development

The District also is concerned that the DEIR and the General Plan do not clarify the need for the County to coordinate planning of new development with the District. While the language regarding the need to reserve school sites "in consultation with the affected districts" in the General Plan policy PS-7.1 is helpful, sections 65352 and 65352.2 require local cities and counties to coordinate planning of school facilities with school districts. The Legislature also confirmed that the parties are meant to coordinate "[o]ptions for the siting of new schools and whether or not the local city or counties existing land use element appropriately reflects the demand for public school facilities, and ensures that new planned development reserves location for public schools in the most appropriate locations." 2

The Legislature recognized that new planned development should take into consideration and even "reserve" where schools would be located to serve the development because schools are as integral a part of planning for new development as is any other public service, such as fire, police, water and sewer. The intent behind sections 65350, et seq., supports the District's position that the County must analyze whether the current size of District schools is adequate to accommodate both its existing population and new development, particularly in light of cumulative impacts.

Specific Development Projects

The District requests that the County contact the District as early as possible in the planning process for specific new development projects. This will allow the District to take the projects into account in its facilities plans. It will also allow the District to give the County input regarding appropriate information to be included in project's environmental analyses, in order to fully analyze the project's impact on District facilities. Including such information in the project's environmental analysis will greatly facilitate the District's interaction with developers and will enable the District to better work with the County to ensure that the children residing in the area have appropriate educational facilities that may safely be accessed. 3

The District is prepared to provide the information necessary to assist the County in its preparation of specific environmental analyses for future development projects. For your information, we have attached the District's most recent "School Facilities Needs Analysis and Justification Report," the District's "School Facility Master Plan," and the District's demographic analysis and forecasts as examples of the type of documents that the District can provide to assist the County in its environmental analyses. District staff would be happy to provide the County with updated documents as necessary, and also provide any additional information needed for the County to fully and adequately analyze the impact of new development on the District.

{SR060655.DOC} 6

L-15

We note that we are aware of other cities and counties that have sometimes taken the position that S.B. 50 precludes either or both analysis of school impacts in an environmental analysis and mitigation of those impacts. Our attorneys, the law firm of Lozano Smith, have had success in meeting with local agencies and their attorneys to address these issues. This has helped to educate public agencies on what they can still do to address and assist public schools, and has allowed for correction of misinformation regarding the effects of S.B. 50. Correcting such misinformation assists cities and counties in ensuring that they are still meeting their CEQA obligations. Materials prepared by our attorneys on this subject are attached. 4

Thank you for this opportunity to provide comments regarding the DEIR. The District looks forward to working with the County to ensure that the District's needs are met and that development in the County will be served by adequate and appropriate educational facilities. Please feel free to contact me if you have any questions.

Sincerely,

Karen L. Luna
Manager of Planning and Facilities

TM/kll

Enclosures:
School Impact Fees – Options Under S.B. 50
Salinas Union High School District School Facility Master Plan w/ Demographic Analysis and Forecasts for Salinas Union High School District
School Facilities Needs Analysis and Justification Report for the Salinas Union High School District

cc: Thomas Manniello, Lozano Smith
Jim Earhart – Associate Supt. – CBO w/o enclosures

{SR060655.DOC} 7

L-15

School Impact Fees –
Options under S.B. 50

February 2008

The following summary outlines options concerning mitigating the impact of new development on school facilities in the era of Senate Bill 50 ("S.B. 50"), which became effective in 1998. The summary provided here is necessarily general, and does not constitute legal advice; legal counsel should be consulted regarding these options.

Developer Fees Under S.B. 50

Prior to S.B. 50, a series of appellate court decisions allowed cities and counties to use their legislative "police power" over land use to assist school districts by requiring developer fees, land dedications, or other measures to mitigate fully the impacts of development on school facilities, even if the mitigation measures exceeded the then-applicable statutory school impact fee. (Mira Development Corp. v. City of San Diego (1988) 205 Cal.App.3d 1201; William S. Hart Union High School v. Regional Planning Commission (1991) 226 Cal.App.3d 1612; Murrieta Valley Unified School District v. County of Riverside (1991) 228 Cal.App.3d 1212.) Central to this line of cases was the duty of cities and counties to assess and mitigate the environmental effects of development under the California Environmental Quality Act ("CEQA") (Pub. Res. Code §§ 21000, et seq.), including the impacts on schools.

S.B. 50 now provides for three levels of statutory fees. The first is the existing statutory fee, which we refer to as a "Level 1" fee. (Gov. Code § 65995.) That fee is adjusted for inflation every two years by the State Allocation Board ("SAB"). The most recent increase was a substantial one, with the SAB approving an increase from $2.63 to $2.97 per square foot of residential development for unified districts in January of 2008. For a school district to implement the increase, it must take its own separate action, based on a developer fee justification study establishing a "nexus" between the impact of new development and the fee. (Gov. Code § 66001. See also Warmington Old Town Assocs. v. Tustin Unified School District (2002) 101 Cal.App.4th 840.)

S.B. 50 also established a basis for additional fees if certain criteria are met. The second, or "Level 2" fee – referred to in the legislation as a "supplemental" fee – is the equivalent of the statutory fee plus an additional amount that, when taken together, are assumed under state standards to equal roughly 50% of a district's actual facilities needs. (Gov. Code § 65995.5.) The final "Level 3" fee, which is roughly 100% of a district's need as established under the state standards, can be imposed only if state funds are no longer available. (Gov. Code § 65995.7.) The Level 2 and Level 3 fees must be justified by a "school facilities needs analysis" ("SFNA") that, unlike a Level 1 justification study, must utilize specific state criteria.

{SR057459.DOC}

L-15

As a tradeoff for the higher Level 2 and 3 fees, the Legislature in S.B. 50 also restricted the ability to impose still higher fees, under CEQA or otherwise. The law states that the payment of the development fees authorized by S.B. 50 constitutes "full and complete mitigation of the impacts of any legislative or adjudicative act" involving the planning, use, or development of real property "on the provision of adequate school facilities." (Gov. Code § 65995, subd. (h) (emphasis added).) The Code further provides that an agency is precluded from denying or refusing to approve a legislative or adjudicative act involving development "on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized [by S.B. 50]." (Gov. Code § 65995, subd. (i).)

This tradeoff has caused impacted school districts that do not qualify for Level 2 fees to seek additional avenues for addressing the impacts of new development on schools. Similarly, some districts find that even if they are eligible for Level 2 fees, the required state formula results in a fee lower than the district's actual need.

Additional Options Available to School Districts

In addition to adopting the maximum justifiable Level 1 fee, there remain a number of options to seek additional means of addressing a school district's needs.

1. S.B. 50 Level 2 Fees

The first option is to seek Level 2 fees under S.B. 50. Our firm has published a handbook that includes detailed information, procedures, time lines, checklists, and forms to assist school districts in enacting both Level 1 and Level 2 developer fees, which can be ordered at http://www.lozanosmith.com/briefs/pdf/other/DFHOrderForm.pdf.

The remaining options described below are applicable primarily to districts that determine that they are not eligible for Level 2 fees, or whose Level 2 fees will be insufficient to address the impact of development upon school facilities.

2. Hardship Funds

If the District is heavily impacted, experiences unusual circumstances beyond its control, or faces extreme financial hardship, it may qualify for state hardship funding. (Ed. Code § 17075.10.) If the District meets all of the state's qualifying criteria (which include making all reasonable efforts to impose the maximum developer fees), it may be able to obtain additional state funding for new construction or modernization. However, due to the nature of the state's complex formula for hardship funding, eligibility is not a given, even when a district appears clearly to have needs justifying the funding.

3. Rely on The Possibility of Denying Development

As noted above, S.B. 50 states that no development project may be denied on the basis of inadequate school facilities. (Gov. Code §§ 65995, subd. (i) & 65996, subd. (b).) However, cities and counties maintain a general police power to approve or disapprove whatever

L-15

development they feel is appropriate for their jurisdiction. While they may be limited in the ability to single out schools and inform a developer that his or her project is being denied on the basis of inadequate school availability or lack of adequate mitigation, cities and counties can still conclude that a project does not contribute overall to the well-being of the city, or that the developer had not shown sufficient commitment to the community, and on that basis consider denying the project.

Working with a cooperative city or county, a school district may thus be able to bring developers to the table to negotiate additional school mitigation, such as participation in a Mello-Roos Community Facilities District. As expressed in Government Code section 65995, subdivision (g)(2), a developer may still "voluntarily elect[] to establish, or annex into, a community facilities district . . . ." Another option of how to address school issues is in a development agreement between the city or county and the developer.

Some cities and counties may provide support to schools in a tacit fashion, while other cities and counties may be more overt about their continued desire to support schools. Several years ago, the City of Livermore responded to arguments by developers that S.B. 50 precluded the City from imposing any extra-statutory school mitigation obligations by threatening a complete moratorium on new development. Such a moratorium would simply be a blanket halt of new construction, rather than a denial of particular developments on the basis of inadequate school facilities. Confronted with this threat, the developers agreed to continue mitigating school impacts as they had before the passage of S.B. 50. Generally, a moratorium comes through a voter referendum, but under Government Code section 65858, a city or county can also adopt an interim ordinance to prohibit uses in conflict with a contemplated general plan, specific plan or Zoning proposal if the approval of a development would result in a threat to the public welfare. This allows a city or county to delay development approvals while it studies the school issues, for a period that can extend up to almost two years.

In the City of Pleasanton, developers, based in large part on the support of the City for schools, have agreed to continue the extra-statutory payments that they had been making prior to S.B. 50's passage (see discussion below of voluntary mitigation agreements). As a result, the District continues to receive fees in the $8.00 range, despite otherwise being ineligible for Level 2 fees.

As another example, San Ramon Unified School District worked with both of its local cities to establish agreements with developers for multiple developer-built schools. While the District's Level 2 fee is in the range of $4.00 per square foot, the District estimates that the agreements reached carry a value in the $8.00 per square foot range.

4. Phasing of Development

It is an open question under S.B. 50 whether a city or county can phase development to limit the impact of new construction on schools. It is not atypical for a city of county to phase development so that the next phase can proceed only if there are adequate utilities and infrastructure available. This is an avenue worth exploring, as developers often depend on bringing a relatively large percentage of their units on line at one time, so that the start-up costs of a project can quickly be covered. Confronted with delays, a developer may be willing to

compromise so as to adequately resolve the school issue.

Many of the same considerations regarding limitations on denial of a project under S.B. 50 apply to phasing. The argument in favor of phasing, however, may be stronger, since the "denial" of projects based on inadequate school facilities is explicitly prohibited, while the legislation is silent regarding limitations on phasing. As a result, we contend that phasing is still allowed by S.B. 50.

5. Seek Revision of City/County Mitigation Program

One option is to revise the local government's mitigation program, whether through revisions to the General Plan or through changes to the school district's procedures under that plan. Some cities and counties have a system where the local government will only approve a certain amount of development within a specified time frame, largely in order to avoid uncontrolled growth. For example, a city may have a program in which development applications are approved based on a point system. For each commitment that the developer makes to the community – such as building parks, paying for sewer extensions, or funding schools – the developer's point total is increased. This is a way of rewarding the developers who make the greatest contribution to the community. Such a program might still be defensible on the basis that the developer's project is not being directly denied on the basis of inadequate school facilities.

6. Impose Conditions on Development Related to Issues Other Than School Overcrowding

While school districts have long focused on the need to mitigate the impact of new development because of resulting school overcrowding, there are also other impacts of new development that can and should be mitigated. S.B. 50 does not "limit or prohibit the ability of a local agency to mitigate the impact of land use approvals other than on the need for school facilities, as defined in this section." (Gov. Code § 65996, subd. (e); see also Gov. Code § 65998, subd. (b) (repeating similar language).) "School facilities," in turn, are defined as "any school-related consideration relating to a school district's ability to accommodate enrollment." (Gov. Code. § 65996, subdivision (c) (emphasis added).)

There are numerous costly impacts associated with growth that do not directly relate to the ability to accommodate new students. Common examples include the need to widen roads or put in other traffic controls to accommodate increased traffic (both from students and generally), safety measures to address pedestrian travel to school, and the need to add sound-proofing to offset noise increases from nearby development and resulting traffic. To the extent that a school district can demonstrate that it confronts these or similar impacts that are unrelated to enrollment, the district can continue to seek conditions on the approval of development under CEQA that will mitigate the impact of such expenses. These conditions can also be used as a device to open negotiations for an agreed upon mitigation arrangement. For example, school districts represented by our firm successfully sued the City of Merced to overturn an environmental impact report for procedural errors, as opposed to issues relating to school overcrowding, in a successful effort to bring the City and developers back to the table to discuss school issues.

7. Maintain that School Facilities Are Not Available

The Government Code includes a process whereby a school district can find that conditions of overcrowding exist in "one or more attendance areas" that will impair educational programs. (Gov. Code § 65971, subd. (a)(1).) Note that this provision does not require that the entire district be overcrowded. A school district's board can further find that no reasonable, sufficient methods of mitigation are available. (Gov. Code § 65971, subd. (a)(2).) At that point, the local city or county can determine that fees or other obligations in addition to the statutory fees are appropriate in certain limited circumstances. (Gov. Code §§ 65972 & 65974.) S.B. 50 explicitly affirms that this remains a valid method of mitigation. (Gov. Code § 65996, subd. (a) ("the following provisions shall be the exclusive methods of considering and mitigating impacts on school facilities . . .: (1) Section 17620 of the Education Code [developer fees]. (2) Chapter 4.7 (commencing with Section 65970) [of the Government Code]").) We note, however, that these provisions are intended to fund only "interim" facilities which would be removed after 5 years. (Gov. Code § 65974, subd. (a)(3), (a)(4).)

8. Decline to Approve "Will-Serve" or Similar Letters

Many cities and counties ask that school districts provide "will-serve" letters or similar assurances that their facilities are adequate to accommodate new growth. In some cases, districts have refused to issue such a letter, potentially stopping the development project even while not "denying" the project based on inadequate school facilities.

There are also other opportunities for a school district to spell out that it has inadequate facilities. For example, real estate agents proposing to sell property through a subdivision must obtain a statement from the local school district indicating the "location of each high school, junior high school, and elementary school serving the subdivision." (Bus. & Prof. Code § 11010, subd. (11).) A school district could argue that there is no school available to "serve" a particular subdivision. This could help bring developers' representatives to the bargaining table to address school availability.

9. Referendum Process

There has been a movement statewide, primarily used by environmentalists and anti-growth groups, to use the referendum process to overturn decisions by cities and counties to approve development. Under this process, if a sufficient number of persons sign a petition, a development approval can be put to a general election. School districts and their supporters have not often attempted to utilize this process, but this may be an option that is worthy of exploration in light of the limitations of S.B. 50. Thus, while a city or county may be limited in its ability to deny development on the basis of inadequate school facilities, voters may be able to accomplish the same result.

10. Challenge The Validity of S.B. 50

One more severe option is to make a direct legal challenge to S.B. 50. Some have suggested that to the extent it can be shown that S.B. 50 does not provide for adequate school facilities, any

provision capping fees violates the California Constitution and potentially other applicable law. One specific theory, which has been explored by the League of Cities, is whether S.B. 50, to the extent that it does not provide adequate mitigation, can legally be allowed to preempt local mitigation requirements, as it unconstitutionally infringes on a city's police powers. This approach yet may eventually succeed through litigation and the cooperation of a sympathetic city or county.

11. Seek Voluntary Mitigation Agreements/Gifts

Another option that remains open is to seek voluntary participation in a Mello-Roos or payment of additional fees under a negotiated agreement. S.B. 50 specifically leaves the option of Mello-Roos arrangements in place, so long as the developer is not being "required" to participate as a condition of project approval. (Gov. Code § 65995, subd. (f).)

S.B. 50 is silent as to whether a voluntary agreement not involving a Mello-Roos is appropriate. We maintain that such agreements can be undertaken, but there are risks involved whether the voluntary agreement involves a Mello-Roos or otherwise. In particular, there can be a potentially negative effect on the District's future qualification for state funds. We have developed various agreements that provide for a gift of funds that may help avoid the gift being tied into any future state facilities financing. At the same time, there may be tax advantages to the developer. Pleasanton Unified, Alameda Unified, Byron Union, and Huntington Beach Union High School Districts are among just a few of our clients currently utilizing this approach. We note that we continue to negotiate school impact agreements statewide despite the limitations of S.B. 50.

12. Land Dedication under the Subdivision Map Act

The Subdivision Map Act states that "a city or county may adopt an ordinance requiring any [developer who develops in a school district] to dedicate to the school district . . . such land as the local legislative body shall deem to be necessary for the purpose of constructing thereon such elementary schools as are necessary to assure the residents of the subdivision adequate public school service." (Gov. Code § 66478; emphasis added.) Thus, the Subdivision Map Act allows a city or county to require land dedication for an elementary school in order to help a school district address the educational needs of the children from a new development. Nothing in S.B. 50 expressly prohibits continued reliance on the Subdivision Map Act.

13. Additional CEQA Considerations

Despite the passage of S.B. 50, there has remained controversy regarding how an environmental impact report or other environmental analysis conducted under CEQA should treat school impacts. While S.B. 50 clarifies that a project may not be denied on the basis of inadequate school facilities, the legislation does not appear to relieve a city or county from analyzing schools and concluding that there are significant impacts. Furthermore, the environmental analysis may have to recognize that there are impacts that remain unmitigated based on the available data. While a city or county could then adopt a statement of overriding consideration, finding that the merits of the project outweigh the unmitigated impacts, this is tantamount to a

city or county having to declare that a housing development is more important to its constituents than adequate schools.

Developers and local governments may argue that they no longer need to address school impacts in any detail or at all in CEQA analysis. We maintain that S.B. 50 has not changed CEQA requirements in this fashion. When cities and counties have analyzed this issue in more detail, they have often agreed with our conclusion. For example, legal counsel for the City of Gilroy conceded that the city should "carefully review and consider all information provided… as to the adequacy of school fees," and should include such information in its environmental documents, despite the terms of S.B. 50 regarding adequate mitigation.

For assistance regarding developer fees and other forms of addressing impacts on schools from new development, please feel free to contact any of Lozano Smith's offices.

Fresno
7404 North Spalding
Fresno, CA 93720-3370
Phone: (559) 431-5600

Sacramento
1107 9th Street, Suite 910
Sacramento, CA 95814
Phone: (916) 329-7433

Los Angeles
801 S. Figueroa St., Ste. 450
Los Angeles, CA 90017
Phone: (213) 929-1066

San Ramon
2000 Crow Canyon Place, Suite 200
San Ramon, CA 94583-1108
Phone: (925) 302-2000

Monterey
4 Lower Ragsdale Drive, Suite 200
Monterey, CA 93940-5728
Phone: (831) 646-1501

Vista
450 S. Melrose Drive, Suite 220
Vista, CA 92081-6664
Phone: (760) 631-5100

Prepared by: Harold Freiman (San Ramon Office)

L-15

**SCHOOL FACILITY NEEDS ANALYSIS
AND JUSTIFICATION REPORT**

for the

SALINAS UNION HIGH SCHOOL DISTRICT

July 2008

Prepared by
School Facility Consultants

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

**SCHOOL FACILITY NEEDS ANALYSIS
AND JUSTIFICATION REPORT**

for the

SALINAS UNION HIGH SCHOOL DISTRICT

July 2008

Prepared for
Salinas Union High School District
431 W. Alisal Street
Salinas, CA 93901
(831) 753-4100

Prepared by
School Facility Consultants
1303 J Street, Suite 500
Sacramento, CA 95814
(916) 441-5063

L-15

Table Of Contents

L-15

Executive Summary

Pursuant to Government Code Section 65995.5, the Salinas Union High School District is authorized to collect Level II fees in the amount of $2.17 per square foot of residential development located in the District's 7-12 and 9-12 service areas. In addition, pursuant to Government Code Section 65995.7, when applicable, the District is authorized to collect Level III fees in the amount of $4.34 per square foot of residential development located within the District's 7-12 and 9-12 service areas.

The District meets the eligibility requirements in Government Code Section 65995.5(b) regarding the collection of Level II and III fees. The dollar amounts of the fees are based on the following facts and projections:

1. The student generation rates of residential housing units projected to be built in the District, calculated in accordance with Government Code Section 65995.6(a), are 0.347 for single-family units and 0.074 for multi-family units in the District's 7-12 service area and 0.234 for single-family units and 0.055 for multi-family units in the District's 9-12 service area.
2. The number of new residential housing units projected to be built in the District over the next five years is 782 single-family and 505 multi-family units, based on information provided by the City of Salinas and the County of Monterey.
3. Multiplying the appropriate terms in (1) and (2) shows that future residential development is projected to add 309 students.
4. The District has zero excess pupil capacity at the 9-12 grade levels available for students generated by future residential development and 374 seats of excess pupil capacity at the 7-8 grade levels.
5. The total number of unhoused pupils generated by future development equals 211 pupils in grades 7-12.
6. The per-pupil allowable costs for the Level II fee equation equal $15,721.00 and $19,892.00 for middle and high school students, respectively. These figures are equal to the per-pupil construction grant amounts in the State School Facility Program plus allowable per-pupil site acquisition and development costs calculated pursuant to Government Code Section 65995.5(c) and 65995.6(h).
7. Total allowable costs for the Level II/III fee equation equals $4,197,212.00 (the District's 9-12 facility cost) for both the District's 7-12 and 9-12 service areas, as the District currently has capacity available to meet the 7-8 new development facility needs quantified in this Report.
8. The total amount of residential square footage projected to be built in the District over the next five years is 1,933,575 square feet for single- and multi-family units, based on an average square footage of 1,945 square feet and 817 square feet for single-family and multi-family units projected to be built in the District, respectively.
9. The District currently has capacity available to meet the 7-8 new development facility needs quantified in this Report. The District does not have local funds available to meet the school facilities needs of 9-12 pupils necessitated by future residential development.

As shown in the body of this Report, the District meets the requirements of Government Code Section 66001 regarding the collection of developer fees (the "reasonable relationship" or "nexus" requirements).

End of Summary

Introduction

The purpose of this Report is to calculate the fee amount that the Salinas Union High School District is authorized to collect on residential development projects pursuant to Government Code Sections 65995.5 and 65995.7. *School Facility Consultants* has been retained by the District to conduct the analysis and prepare this Report.

State law gives school districts the authority to charge fees on new residential developments, if those developments generate additional students and cause a need for additional school facilities. All districts with a demonstrated need may collect fees pursuant to Government Code Section 65995 (Level I fees). Level I fees are currently capped at $2.97 per square foot of new residential development for grades K-12; this cap is adjusted bi-annually by the State Allocation Board, with the next adjustment scheduled for January 2010. The District currently shares developer fee revenue with feeder districts in its 7-12 and 9-12 service areas. The District receives 46.15 percent of fee revenue in its 7-12 service area, and 30.77 percent of fee revenue in its 9-12 service area. As a result, the District would be entitled to a Level I fee of $1.37 per square foot of residential development in its 7-12 service area and $0.91 per square foot of residential development in its 9-12 service area. Government Code Sections 65995.5 and 65995.7 authorize districts to collect fees in excess of Level I fees, provided that the districts meet certain conditions (Level II and Level III fees). Government Code Section 66001 requires that a reasonable relationship exist between the amount and use of developer fees and the developments on which they are to be charged.

The Salinas Union High School District provides seventh through twelfth grade education for the territory of the District served by the Salinas City Elementary and Alisal Union Elementary School Districts (the District's 7-12 service area). The District provides ninth through twelfth grade education only for the territory of the District served by the Graves Elementary, Lagunita Elementary, Santa Rita Union Elementary, Spreckels Union Elementary and Washington Union Elementary School Districts (the District's 9-12 service area). As a result, this Report calculates separate single- and multi-family Level II and Level III fees for both the District's 7-12 and 9-12 service areas as described above.

This Report is divided into three sections. The first summarizes the specific requirements in State law regarding Level II and Level III fees and establishes the District's authority to collect them. The second calculates the dollar amounts of Level II and Level III fees that the District is authorized to collect. The third explains how the District satisfies the requirements of Government Code Section 66001 with respect to Level II and III fees, summarizes other potential funding sources for school facilities and presents recommendations regarding the collection of developer fees.

End of Section

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

Salinas Union High School District: 2008 School Facility Needs Analysis and Justification Report

I. Authority to Collect Level II and Level III Fees

State law establishes several requirements in order for school districts to collect Level II fees. Specifically, districts must: (1) apply to the State Allocation Board and be deemed eligible for State funding for new school construction, (2) adopt a school facility needs analysis and (3) satisfy at least two of the four criteria set forth in Government Code section 65995.5(b)(3)(A-D).

The requirements for collecting Level III fees are the same as Level II fees. Before districts can collect Level III fees, however, the State Allocation Board must certify that it has no funds available to apportion to districts for construction of new school facilities.

The District has satisfied the three criteria for Level II fees as described below. If the State Allocation Board certifies that it has no funds available for apportionment, then the District will have satisfied the criteria for Level III fees as well.

A. Eligibility for State Funding for New Construction

The District has been deemed eligible to receive State funding for construction of new school facilities as outlined in Government Code Section 65995.5(b)(1). The District's most recent eligibility approval was at the July 25, 2007, meeting of the State Allocation Board (see Appendix A).

B. Adoption of School Facility Needs Analysis

This Report meets the requirements of Government Code Section 65995.6 for a school facility needs analysis, that is, a study that shall "determine the need for new school facilities for unhoused pupils that are attributable to projected enrollment growth from the development of new residential units over the next five years." By adopting this study, the District will satisfy this requirement.

C. Criteria in Government Code Section 65995.5(b)(3)(A-D)

The District meets the criterion outlined in 65995.5(b)(3)(C)(ii), that is, the District has issued debt or incurred allocations for capital outlay in an amount equivalent to 30 percent of the District's local bonding capacity. The District has issued debt equal to 39.4 percent of the District's bonding capacity (Outstanding general obligation bond debt of $74,253,610 divided by the District's 2007/08 Bonding Capacity of $188,430,258 equals 39.4 percent).

The District also meets the criterion outlined in 65995.5(b)(3)(D), that is, that at least 20 percent of the teaching stations within the District are relocatable classrooms. According to the District's current Office of Public School Construction Form SAB 50-02, 36.5 percent (168 out of 460) of the total teaching stations in the District are in relocatable classrooms. The District has also added capacity through the construction of (1) La Paz Middle School (37 permanent teaching stations), (2) an addition at Alisal High School (14 permanent teaching stations), (3) an addition at North Salinas High School (14 permanent teaching stations), (4) an addition at Harden Middle School (9 permanent teaching stations) and (5) an addition at Alvarez (Everett) High School (22 permanent

Final Environmental Impact Report
Monterey County 2007 General Plan

March 2010
ICF 00982.07

teaching stations). Including these projects in the District's capacity indicates that 30.2 percent (168 out of 556) of the total teaching stations in the District are relocatable classrooms.

End of Section

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

Salinas Union High School District: 2008 School Facility Needs Analysis and Justification Report

II. Amount of Level II and Level III Fees

State law outlines the method by which Level II fees are calculated. The intent of the law is that the Level II fee represents half the cost, as defined in the State School Facility Program, of providing new school facilities. The methods defined in State law for calculating the Level II fee, however, underestimate the District's true cost of providing school facilities.

The Level II fee is calculated by (1) determining the allowable cost for new school facilities as outlined in the State School Facility Program, and (2) dividing that cost by the amount of new residential square footage projected to be built in the District over the next five years.

A. Allowable Cost for New School Facilities

State law prescribes the following process for calculating the allowable cost for new school facilities:

(1) determine the number of unhoused students attributable to future residential development;
(2) multiply the number of unhoused students by the per-pupil construction costs of new elementary, middle or high schools as outlined in Education Code section 17072.10;
(3) determine the amount of site acquisition and development costs to be included as allowed by Government Code Section 65995.5(h); and
(4) subtract the amount of local funds dedicated to school facilities necessitated by future residential development from the sum of (2) and (3).

(1) Number of Unhoused Students

The number of unhoused students generated by future development in the next five years equals the total number of students generated by future development minus the District's existing excess pupil capacity.

As required by Government Code Section 65995.6(a), the student generation rate used to calculate the Level II fee is based on the historical generation rates of residential units constructed during the previous five years.

This Report estimates the number of students that will be generated by a new single- and multi-family housing unit by (1) counting the number of students in the District who live in housing units that paid developer fees between March 2003 and February 2008, and (2) dividing that number by the total number of housing units that paid developer fees over the same time period (see Appendix D). This Report uses historical developer fee collection data from the Salinas Union High School District to derive the housing counts and a District-provided March 2008 student list to derive the student counts.

Final Environmental Impact Report
Monterey County 2007 General Plan

7-192

March 2010
ICF 00982.07

Addresses for units that paid developer fees from March 2008 to the present date are not used in the calculation because (1) student address files may not reflect residents' address changes for up to one year, (2) students who have moved from a nearby district may continue to attend their previous school until the end of the school year and (3) units listed may not have been completed and occupied by the time the student address list was compiled.

The student generation rates for the 7-8 grade group are based on developer fee records only for those housing units located in the District's 7-12 service area (Salinas City Elementary School District and Alisal Union Elementary School District), as homes outside this area do not generate 7-8 grade pupils that attend the Salinas Union High School District.

Table 1-1 summarizes the student generation rates for single-family and multi-family units.

Table 1-1
Student Generation Rates

Grade Group	Single-Family	Multi-Family
7-8	0.113	0.019
9-12	0.234	0.055

Based on information provided by the City of Salinas Development and Permit Services Department and Department of Development and Engineering Services, the Housing Authority of the County of Monterey and the Monterey County Environmental Resource Policy – Housing and Redevelopment Office and the Monterey County Planning & Building Inspection Department, this Report estimates the District's projected residential development to be 782 single-family and 505 multi-family units over the next five years. These totals do not include new units projected to be built in developments bound by alternative mitigation agreements with the District as these developments will not be subject to the developer fees quantified in this Report (i.e., the Sconberg Ranch development project).

Table 1-2 shows the total number of students projected to enter the District from housing units built over the next five years.

Table 1-2
Students Generated by Future Development

	7-8 Students	9-12 Students
Single-Family	0.113 x 782 = **88**	0.234 x 782 = **183**
Multi-Family	0.019 x 505 = **10**	0.055 x 505 = **28**
Total Students	**98**	**211**

In determining how many of the students in Table 1-2 are unhoused, the District must consider any existing excess capacity. State law requires districts to calculate their

total pupil capacity according to the method described in Section 17071.10 of the Education Code. As stated on the District's current Office of Public School Construction Form SAB 50-02, the District's pupil capacity as calculated pursuant to Education Code Section 17071.10 is 3,252 in grades 7-8 and 6,211 in grades 9-12. These capacities are inclusive of the Special Day Class capacity identified on the District's Office of Public School Construction Form SAB 50-02, and do not reflect a Substantial Enrollment Requirement adjustment, as the District is not required to reflect a SER adjustment pursuant to School Facility Program Regulation Section 1859.35.

In addition to the capacity reflected on the District's Office of Public School construction Form SAB 50-02, the District has also added capacity through the State School Facility Program funding and the construction of (1) La Paz Middle School (879 7-8 seats), (2) an addition at Alisal High School (345 9-12 seats), (3) an addition at North Salinas High School (339 9-12 seats), (4) an addition at Harden Middle School (254 7-8 seats) and (5) an addition at Alvarez (Everett) High School (538 9-12 seats).

As outlined in Table 1-3 the District's total existing capacity is 4,385 students in grades 7-8 and 7,433 students in grades 9-12.

At the 7-8 grade group, the District has 374 seats of existing excess capacity (7-8 capacity of 4,385 minus 2007/08 7-8 enrollment of 4,011 equals 374 available seats, see Table 1-3). As a result, none of the 98 7-8 students listed in Table 1-2 are defined as unhoused.

At the 9-12 grade group, the District's current enrollment as reported in its October 2007 CBEDS information is greater than the 9-12 pupil capacity listed above: 9,561 students are enrolled in grades 9-12. Therefore, all 9-12 students listed in Table 1-2 are defined as unhoused.

Table 1-3
Existing Capacity

Grade Group	Capacity	2007/08 Enrollment	Existing Capacity Available for Students from Future Development	Unhoused Students From Future Residential Development
7-8	4,385	4,011	374	0
9-12	7,433	9,561	0	211

(2) Allowable Grant Costs

Table 1-4 shows the total allowable grant costs for new facilities necessitated by pupils generated from future single- and multi-family residential development. The per-pupil grant costs are taken from Education Code section 17072.10 and include

adjustments as required by Labor Code Section 1771.7(e) and Education Code Section 17074.56(a) (see Appendix B for details regarding grant cost calculations).

Table 1-4
Allowable Grant Costs for Pupils Generated from Future Residential Development

Grade Group	Per-pupil Grant Cost	Number of Unhoused Students	Total Grant Cost
7-8	$9,597.00	0	$0.00
9-12	$12,169.50	211	$2,567,764.50

The per-pupil grant does not include the cost of school development items that the local community may deem important to meeting the quality of facilities in the District (i.e., administration, project management, contingencies, etc.). Because the per-pupil grants do not address certain costs, the actual funding will likely not be adequate to fund school facilities to the quality and level required by the District. Therefore, the final calculation of Level II fees will likely understate the funding actually required by the District.

(3) Allowable Site Acquisition and Development Costs

Table 1-5 shows the per-pupil site acquisition and development costs for middle and high school students. The site sizes for new middle school and high school projects are consistent with the guidelines in the "School Site Analysis and Development Handbook" published by the California State Department of Education.

Site acquisition costs for the District's new middle school and new high school projects equal $364,000 per acre, based on (1) a land purchase that the District completed in January 2007 for the price of $350,000 per acre, (2) an increase of four percent pursuant to Section 1859.74 of Title 2 of the California Code of Regulations for appraisals, surveys, site testing, California Department of Education review/approval, preparation of the POESA and PEA. Estimated site development costs are consistent with the guidelines in Government Code Section 65995.5(h) (see Appendix C for details regarding site acquisition and development cost estimates).

Table 1-5
Calculation of Per-pupil Site Acquisition and Development Costs

Grade Group	Per-pupil Site Acquisition Costs*	Per-pupil Site Development Costs	Total Per-pupil Site Acquisition and Site Development Costs
7-8	$7,972	$4,276	$12,248
9-12	$9,457	$5,988	$15,445

*based on District new middle school capacity of 1,000 students and new high school capacity of 1,500 students.

Pursuant to Government Code Sections 65995.5(c) and 65995.5(h), the allowable cost for site acquisition and development is calculated by (1) multiplying the per-pupil cost by one-half and (2) multiplying that result by the number of unhoused elementary, middle and high school students. Table 1-6 shows the total allowable site acquisition and development costs for new facilities necessitated by pupils generated from future single- and multi-family residential development.

Table 1-6
Allowable Site Acquisition and Development Costs for Pupils Generated from Future Residential Development

Grade Group	One-half of per-pupil costs	Number of unhoused students	Allowable Cost
7-8	$6,124.00	0	$0.00
9-12	$7,722.50	211	$1,629,447.50

(4) Local Funds Dedicated to School Facilities Necessitated by Future Development

As outlined in Table 1-7, the District currently has 2,128 9-12 students that are unhoused.

Table 1-7
Existing Unhoused Pupils

Grade Group	Current Capacity	2007/08 Enrollment	Existing Unhoused Pupils
7-8	4,385	4,011	0
9-12	7,433	9,561	2,128
Total	11,818	13,572	2,128

Table 1-8 summarizes the cost of providing school facilities for existing unhoused students. Table 1-8 uses a per-pupil grant cost that is twice the allowable cost for the Level II fee (because the Level II fee is intended to only reflect one-half the cost of providing school facilities as defined in the State School Facility Program). Per-pupil site acquisition and development costs are the same as those used to calculate the allowable cost for Level II fees.

Table 1-8
Cost of Providing School Facilities for Existing Unhoused Pupils

Grade Group	Existing Unhoused Pupils*	Per-pupil Construction Costs	Per-pupil Site Acquisition and Development Costs	Total Cost
7-8	0	$19,194	$12,248	$0
9-12	2,128	$24,339	$15,445	$84,660,352
Total	2,128			$84,660,352

*See Table 1-3 and Table 1-7

The District has no funds dedicated to school facilities necessitated by future development. The District has funds available for new construction projects, through the passage of its middle school (Measure M) and high school (Measure F) Proposition 39 General Obligation Bonds passed on November 5, 2002, and March 5, 2002, respectively, as well as developer fees and special reserve funds. The District also anticipates approximately $252,041 in commercial/industrial developer fee revenue over the next five years based on the total commercial/industrial square footage that paid developer fees between March 2007 and February 2008, projected forward five years. The District's middle school bond funds are restricted to middle school projects, as the high school bond funds are restricted to high school projects, so this Report considers the District's available funds in relation to the cost of housing its currently unhoused pupils by middle (7-8) and high (9-12) school grade groupings.

For the 7-8 grade levels, the District currently has sufficient available capacity to house 7-8 grade pupils from new residential development.

For the 9-12 grade levels, the District has approximately $16.65 million in authorized bond funds from the passage of its high school General Obligation Bond available for future new construction projects. The District also has $1,332,225 in Capital Projects Fund balances available for 7-12 new construction projects. In addition, based on the total commercial/industrial square footage that paid developer fees between March 2007 and February 2008, the District estimates that there will be approximately $252,041 in commercial/industrial developer fee revenue over the next five years available for 7-12 new construction projects. Even if all of the above funds were available for the District's 9-12 projects, the District's total available funds for housing 9-12 pupils would be approximately $18,234,266. Comparing the $18,234,266 in available funds to the cost of providing school facilities for existing unhoused 9-12 students ($84,660,352) demonstrates that all these available funds are required to provide facilities for existing unhoused 9-12 students, with a need remaining of $66,426,086. This remaining need far outstrips the Level II fee, which will generate only $4,195,858 based on the projections contained herein.

The District has no surplus property that could be used for a high school site or that is available for sale to finance school facilities.

(5) Total Allowable School Facility Cost for Level II Fees

Tables 1-9a and 1-9b show the total costs for housing 7-8 grade and 9-12 grade pupils attributable to future residential development.

(continued on next page)

Table 1-9a
Total Cost for Housing 7-8 Grade Pupils from Future Residential Development

Category	Amount
Construction	$0.00
Site Acquisition and Development	$0.00
Less Local Funds Dedicated	N/A
Total	$0.00

Table 1-9b
Total Cost for Housing 9-12 Grade Pupils from Future Residential Development

Category	Amount
Construction	$2,567,764.50
Site Acquisition and Development	$1,629,447.50
Less Local Funds Dedicated	N/A
Total	$4,197,212.00

As demonstrated in Section II.A.(4) above, the District currently has sufficient capacity to house 7-8 pupils from future residential development quantified in this Report. Therefore, the total allowable cost for purposes of calculating the District's Level II/III developer fees on future residential development does not include the cost of housing 7-8 pupils resulting from this development. Tables 1-10a and 1-10b demonstrate the total allowable cost for the Level II/III fee calculation for the District's 7-12 and 9-12 service areas.

Table 1-10a
Total Allowable Cost for Level II/III Fees for Pupils from Future Residential Development in the 7-12 Service Area

Category	Amount
Allowable 7-8 Pupil Cost	$0.00
Allowable 9-12 Pupil Cost	$4,197,212.00
Districtwide Total	$4,197,212.00

Table 1-10b
Total Allowable Cost for Level II/III Fees for Pupils from Future Residential Development in the 9-12 Service Area

Category	Amount
Allowable 9-12 Pupil Cost	$4,197,212.00
Districtwide Total	$4,197,212.00

B. Amounts of Level II and Level III Fees

The Level II fee is calculated by dividing the total allowable cost by the amount of new residential square footage projected to be built in the District over the next five years. As stated in Section II.A.(1) above, over the next five years 782 single-family and 505 multi-family units are projected to be built in the District. These totals do not include units projected to be built in developments bound by alternative mitigation agreements with the District as these developments will not be subject to the developer fees quantified in this Report (i.e., the Sconberg Ranch development project). Based on information provided by the City of Salinas Development and Permit Services Department and Department of Development and Engineering Services, the Housing Authority of the County of Monterey and the Monterey County Environmental Resource Policy – Housing and Redevelopment Office and the Monterey County Planning & Building Inspection Department, this Report estimates that new housing units in the District will have an average square footage of 1,945 square feet and 817 square feet for single- and multi-family units, respectively. Multiplying average square footage by number of units (1,945 square feet times 782 single-family units, plus 817 square feet times 505 multi-family units) produces a total of 1,933,575 square feet of residential development projected to be built in the District over the next five years.

State law allows school districts to charge a fee higher than a Level II fee if: (1) the district meets the requirements for Level II fees and (2) the State Allocation Board notifies that it has no funds available to apportion to districts for construction of new school facilities. In the District's case, this higher fee, referred to as a Level III fee, is approximately twice the Level II fee.

Tables 1-11a and 1-11b show the calculations for Level II and Level III developer fees for the District's 7-12 and 9-12 service areas, based on the total projected square footage figures and the total allowable costs identified in Section II.A.5, above:

Table 1-11a
Level II and III Fees for Pupils from
Residential Development in the 7-12 Service Area

Total Allowable Cost	$4,197,212.00
Total Projected Square Footage	1,933,575
Level II Fee	**$2.17**
Level III Multiplier	2
Level III Fee	**$4.34**

(continued on next page)

Table 1-11b
Level II and III Fees for Pupils from
Residential Development in the 9-12 Service Area

Total Allowable Cost	$4,197,212.00
Total Projected Square Footage	1,933,575
Level II Fee	**$2.17**
Level III Multiplier	2
Level III Fee	**$4.34**

The calculation of Level II and Level III fees, in accordance with the formulas provided in the statutes, will likely be understated when measured against the actual calculation of costs due to the limited inclusion of cost categories to determine actual costs per student and the fluctuating student generation rates. The District needs to account for these issues when conducting a revenue/cost analysis utilizing the calculated Level II and Level III fees.

End of Section

III. Findings and Recommendations

This section (1) shows that the District meets the requirements of Government Code Section 66001 regarding the collection of developer fees, (2) summarizes other potential funding sources for the District's capital projects, and (3) presents recommendations regarding the collection of developer fees.

A. Findings

(1) Government Code Section 66001(a)(1)—Purpose of the Fee

The purpose of imposing and collecting Level II or Level III fees is to acquire funds to construct or reconstruct school facilities for students generated by future residential developments.

(2) Government Code Section 66001(a)(2)—Use of the Fee

The District use of the fee will involve constructing and/or reconstructing new high school campuses and/or additional permanent facilities on existing high school campuses. In addition, the District may build other school related facilities and purchase or lease relocatable classrooms to use for interim housing while permanent facilities are being constructed.

Revenue from Level II or Level III fees collected on future residential development may be used for, but not limited to, all of the following:
(1) land (purchased or leased) for school facilities,
(2) design of school facilities,
(3) permit and plan checking fees,
(4) construction or reconstruction of school facilities,
(5) testing and inspection of school sites and school buildings, and
(6) interim school facilities (purchased or leased) to house students generated by future development while permanent facilities are being constructed.

(3) Government Code Section 66001(a)(3)—Relationship Between Fee's Use and the Type of Project Upon Which the Fee is Imposed

All types of new residential development—including but not limited to single- and multi-family units in new subdivisions and in "in-fill" lots, single- and multi-family units in redevelopment projects, single- and multi-family units that replace demolished units (to the extent that the new units are larger than the demolished units), additions of residential space to existing single- and multi-family units, manufactured homes, mobile homes and condominiums—are projected to cause new families to move into the District and, consequently, generate additional students in the District. As shown earlier in this Report, sufficient school facilities do not exist for these students. All types of new residential development, therefore, create a need for additional school facilities. The fee's use (acquiring school facilities) is,

therefore, reasonably related to the type of projects (new residential developments) upon which it is imposed.

(4) Government Code Section 66001(a)(4)—Relationship Between the Need for the Public Facility and the Type of Project Upon Which the Fee is Imposed

The District is currently operating over capacity at the 9-12 grade levels, that is, the District has no available capacity to house additional 9-12 students. Because future residential development in the District will generate additional students, it creates a need for additional school facilities. A relationship exists, therefore, between the District's need to build additional school facilities to house additional students and the construction of future residential development projects.

(5) Government Code Section 66001(b)—Relationship Between the Fee and the Cost of the Public Facility Attributable to the Development on Which the Fee is Imposed

This study concludes that the methods prescribed by State law for estimating school facility construction costs, and for calculating Level II and Level III fees, supports the establishment of Level II and Level III fees, which when collected, will contribute to the District's cost of constructing and reconstructing school facilities to house students generated by future residential construction. The relationship between the cost of the facility and the amount of fees is set forth above, including in Tables 1-4 and 1-5 of Section II.A.(2) and Section II.A.(3), respectively.

(6) Other Funding Sources

The following is a review of potential other funding sources for constructing school facilities. Please note that pursuant to Section II.A.4, the District does not have any local funds available for the construction of school facilities for housing students from new development.

a) General Fund
The District's General Fund budget is committed to instructional and day to day operating expenses and not used for capital outlay uses, as funds are needed solely to meet the District's non-facility needs.

b) State Programs
The District is approved for eligibility for State funding for construction of new school facilities under the 1998 Leroy F. Greene School Facility Program. As outlined in Section II.A.(1), the District has applied for and received funding for La Paz Middle School, and addition projects at North Salinas High School, Alisal High School, Harden Middle School and Everett Alvarez High School. Even projects funded at 100 percent of the State allowance, however, experience a shortfall between State funding and the District's actual facility needs. State funds for deferred maintenance may not be used to pay for new facilities. State law prohibits use of lottery funds for facilities.

c) General Obligation Bonds
School districts can, with the approval of either two-thirds or 55 percent of its voters, issue general obligation bonds that are paid for out of property taxes. The District gained voter approval for a Proposition 39 General Obligation Bond in March 2002, and another General Obligation Bond in November 2002. As outlined in Section II.A.(4), these bonds are either inadequate or unavailable to cover costs for high school facilities necessitated by future residential development.

d) Alternative Mitigation Agreements
Some residential development may choose to negotiate an alternative mitigation agreement with the School District. Students generated from these developments and the revenues from these mitigation agreements are not considered in this report, as these homes are not subject to the Fee considered in this report and the funds collected from these homes are not available to reduce the impact of development that will be subject to the Fee.

e) Parcel Taxes
Approval by two-thirds of the voters is required to impose taxes that are not based on the assessed value of individual parcels. While these taxes have been occasionally used in school districts, the revenues are typically minor and are used to supplement operating budgets. The District does not currently collect parcel tax revenue.

f) Mello-Roos Community Facilities Districts
This alternative uses a tax on property owners within a defined area to pay long-term bonds issued for specific public improvements. Mello-Roos taxes require approval from two-thirds of the voters (or land owners if fewer than 12) in an election. The District currently does not have any Mello-Roos authorizations.

g) Surplus Property
The District has no surplus property that could be used as a high school site or that is available for sale to finance school facilities.

Based on the forgoing, there are no excess funds to aid new construction to accommodate students from new development.

B. Recommendations

Based on the findings outlined above, it is recommended that the Board of Trustees, as provided for in Government Code Section 65995.5, approve a resolution to levy Level II fees on future residential development in the amount of $2.17 per square foot of residential development located within the District's 7-12 and 9-12 service areas.

In addition, it is recommended that the Board of Trustees, as provided for in Government Code Section 65995.7, approve a resolution to levy Level III fees on future residential development in the amount of $4.34 per square foot of residential development located within the District's 7-12 and 9-12 service areas.

End of Report

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

Appendix A

State Allocation Board
New Construction Eligibility Approval

L-15

State Allocation Board Meeting, July 25, 2007

ATTACHMENT A

District	Attendance Area	County	Appl Number 50	Type of Adj	K-6	7-8	9-12	Non-Severe	Severe
Pomona Unified	HSAA Pomona	Los Angeles	64907-04-00						
Current Baseline Eligibility					-506	-661	-128	15	8
Adjustment Per This Item				e	237	-193	-401	-46	10
Net Baseline Eligibility					-269	-854	-529	-31	18
Saddleback Valley Unified	Districtwide	Orange	73635-00-00						
Current Baseline Eligibility					363	0	451	-184	17
Adjustment Per This Item				g	-363	0	-451	184	-17
Net Baseline Eligibility					0	0	0	0	0
Salinas Union High	Districtwide	Monterey	66159-00-00						
Current Baseline Eligibility					0	-49	2351	-226	37
Adjustment Per This Item				e	0	-1231	-2291	-30	10
Adjustment Per This Item				g	0	188	358	22	0
Net Baseline Eligibility					0	-1092	418	-234	47
San Bernardino City Unified	Districtwide	San Bernardino	67876-00-00						
Current Baseline Eligibility					1436	154	2492	748	319
Adjustment Per This Item				e	-3252	-1313	-2377	-181	67
Net Baseline Eligibility					-1816	-1159	115	567	386
San Diego City Unified	HSAA Scripps Ranch/Mira Mesa	San Diego	68338-01-00						
Current Baseline Eligibility					-369	-1692	192	332	429
Adjustment Per This Item				e	748	17	75	-49	-94
Adjustment Per This Item				f	1413	421	885	-352	-422
Net Baseline Eligibility					1792	-1254	1152	-69	-87
San Dieguito Union High	Districtwide	San Diego	68346-00-00						
Current Baseline Eligibility					0	1036	277	36	-38
Adjustment Per This Item				e	0	-160	-48	-25	37
Net Baseline Eligibility					0	876	229	11	-1
San Lorenzo Valley Unified	Districtwide	Santa Cruz	69807-00-00						
Current Baseline Eligibility					349	-28	313	0	0
Adjustment Per This Item				f	75	0	0	0	0
Net Baseline Eligibility					424	-28	313	0	0

L-15

Appendix B

Calculation of Allowable Per-Pupil Grant Costs

L-15

Appendix B
Calculation of Allowable Per-Pupil Grant Costs

The per-pupil grant costs, calculated per the provisions of Government Code Section 65995.5(c)(1), include the School Facility Program (SFP) grants outlined in Education Code Section 17072.10, fire alarm and sprinkler grants mandated by Education Code Section 17074.56 and outlined in Education Code Section 17074.50 and 17074.52, and Labor Compliance Program (LCP) per Labor Code Section 1771.7(a) and (b), as illustrated in the tables below:

Since the fire alarm and sprinkler grants mandated by SB 575 are per-pupil grant increases, it is simple to add them to the SFP base new construction grant amounts (see Table B-1). These figures will then be used to determine the LCP grant increases for each of the District's projects used as cost models below, and then the per-pupil grant increases for each grade grouping, to produce final per-pupil grant figures for use in calculating the District's Level II/III fees.

Table B-1
SFP Per-Pupil Grants Plus Fire Alarm/Sprinkler Funding

Grade Group	7-8	9-12
SFP Grant	$9,348	$11,893
SB 575 Fire Alarm Grant	$14	$24
SB 575 Sprinkler Grant	$177	$183
50% Total Grant	$9,539	$12,100
100% Total Grant	$19,078	$24,200

These new per-pupil base grants, added to the per-pupil site development figures calculated in Appendix C, multiplied by the pupil capacity of each project used as a cost model, equals the estimated total funding (excluding site acquisition) for each project, as illustrated in Table B-2:

Table B-2
Calculation of Total Funding for Each District Cost Model Project

7-8 Projects			
School	Per-Pupil Cost	Number of Pupils	Total Cost
New MS	$23,354	1,000	$23,354,000
9-12 Projects			
School	Per-Pupil Cost	Number of Pupils	Total Cost
New HS	$30,188	1,500	$45,282,000

Table B-3 calculates the per-pupil LCP grant addition by grade grouping, using the per-site totals from Table B-2 to determine the total LCP grant for each site.

L-15

Table B-3
Total LCP Grant Additions by Grade Grouping

7-8 Projects		
School	Total Cost	Total LCP Grant*
New MS	$23,354,000	$116,087
9-12 Projects		
School	Total Cost	Total LCP Grant*
New HS	$45,282,000	$208,184

*Calculated pursuant to SFP regulation section 1859.71.4

Table B-4 calculates the per-pupil LCP grant addition by grade grouping, using the total LCP grants from Table B-3, dividing that figure by the appropriate pupil capacity, and averaging these results by grade group as necessary.

Table B-4
Calculation of Per-Pupil LCP Grant Additions by Grade Grouping

7-8 Projects			
School	Total LCP Grant	Total Site Capacity	LCP Grant/Pupil
New MS	$116,087	1,000	$116
Totals	N/A	N/A	N/A
		100% Grant	$116.00
		50% Grant	$58.00
9-12 Projects			
School	Total LCP Grant	Total Site Capacity	LCP Grant/Pupil
New HS	$208,184	1,500	$139
Totals	N/A	N/A	N/A
		100% Grant	$139.00
		50% Grant	$69.50

Table B-5 adds the per-pupil LCP grant additions calculated in Table B-4 to the totals calculated in Table B-1 to determine the final per-pupil construction grants allowable for use in the Level II-III fee calculations.

Table B-5
Calculation of Final Per-Pupil Grant Costs by Grade Grouping

Grade Group	7-8	9-12
SFP Construction Grant	$9,539.00	$12,100.00
50% LCP Grant	$58.00	$69.50
50% Total Grant	$9,597.00	$12,169.50

L-15

Appendix C

Calculation of Allowable Per-Pupil
Site Acquisition and Site Development Cost

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

Appendix C
Calculation of Allowable Per-Pupil Site Acquisition and Site Development Costs

Site Acquisition Costs for Middle and High School Projects

The site sizes for new middle school and high school projects are consistent with the guidelines in the "School Site Analysis and Development Handbook" published by the California State Department of Education (CDE).

Site acquisition costs for the District's new middle school and new high school projects equal $364,000 per acre, based on (1) a land purchase that the District completed in January 2007 for the price of $350,000 per acre, (2) an increase of four percent pursuant to Section 1859.74 of Title 2 of the California Code of Regulations for appraisals, surveys, site testing, CDE review/approval, preparation of the POESA and PEA. Estimated site development costs are consistent with the guidelines in Government Code Section 65995.5(h).

Table C-1
Site Acquisition Costs for Middle and High School Projects

Projects	Number of Acres Required	Site Acquisition Cost Per Acre	Total Site Acquisition Cost
Middle:			
New middle school	21.9	$364,000	$7,971,600
Middle School Subtotal			$7,971,600
High:			
New high school	38.97	$364,000	$14,185,080
High School Subtotal			$14,185,080
Total			$22,156,680

Site Development Costs for Middle School Projects

Service site development, off-site development, and utility costs for District middle school projects are based on the service site development, off-site development, and utility costs associated with the La Paz Middle School project, which received an apportionment at the September 22, 1999, meeting of the State Allocation Board, inflated by the Class B Construction Cost Index increase from 1.34 in September 1999 to 1.98, for a total inflation rate of 47.76 percent, as approved at the July 23, 2008, meeting of the State Allocation Board. These costs are as follows:

(continued on the next page)

Table C-2
Service Site Development, Off-Site Development and Utility Costs for Middle School Projects

Middle School Projects	Costs
La Paz Middle School:	
Service Site	$985,668
Off-Site	$142,750
Utilities	$156,448
Subtotal:	$1,284,866
Class B Construction Cost Index Adjustment (47.76%)	$613,652
Total:	$1,898,518
Cost Per Acre*	$114,231
Total Cost for New 21.9-Acre Middle School Project**	$2,501,659
Per-Pupil Cost***	$2,502

*La Paz Middle School is on a 16.62-acre site.
**21.9 acres is consistent with the CDE "School Site Analysis and Development Handbook" for a middle school with capacity of 1,000 pupils.
***Equals total cost divided by New MS capacity of 1,000 pupils.

Estimated general site development costs for District middle school projects are based on the average allowable general site development costs, as defined in Section 1859.76 of Title 2 of the California Code of Regulations. These costs are as follows:

Table C-3
General Site Development Costs for Middle School Projects

Middle School Cost Model Projects	Acres	Per-Acre Cost	Pupils	Per-Pupil Cost	Costs
Per-Useable Acre General Site Cost	21.9	$28,728	n/a	n/a	$629,143
Per-Pupil General Site Cost	n/a	n/a	1,000	$1,145*	$1,145,000
Totals	21.9	n/a	1,000	n/a	$1,774,143
Average Per-Pupil General Site Development Cost**					$1,774

*Equals 6% of the 7-8 per-pupil base grant amount of $19,078.
**Equals the totals of the General Site Costs, divided by the pupil capacity of the projects.

The total anticipated Site Development Costs for District middle school projects equals the per-pupil service site, off-site and utility development cost for the District's middle school projects, plus the average per-pupil general site development costs related to the District's middle school projects. The following table illustrates the total per-pupil site development costs for future District middle school projects.

Table C-4
Total Site Development Costs for Middle School Projects

Middle School Projects	Costs
Average Per-Pupil Service Site, Off-Site and Utility Costs	$2,502
Average Per-Pupil General Site Development Costs	$1,774
Total Per-Pupil Site Development Cost	$4,276

Site Development Costs for High School Projects

Service site development, off-site development, and utility costs for District high school projects are based on a November 2002 District estimate of site development costs for a new 50 acre high school project, inflated by the increase to the Class B Construction Cost Index from 1.46 in November 2002 to 1.98, for a total inflation rate of 35.62 percent, as approved at the July 23, 2008, meeting of the State Allocation Board. These costs are as follows:

Table C-5
Site Development Costs for High School Projects

High School Projects	Costs
Architect High School Site Development Estimate:	
Service Site	$4,400,000
Off-Site	$1,500,000
Utilities	$250,000
Subtotal:	$6,150,000
Class B Construction Cost Index Adjustment (35.62%)	$2,190,630
Subtotal:	$8,340,630
Site Development Cost Per Acre*	$166,813
Total Site Development Cost for New 38.97-Acre High School Project**	$6,500,703
Per-Pupil Site Development Cost***	$4,334

*Architect estimate is based on a 50-acre school site.
**38.97 acres is consistent with the CDE "School Site Analysis and Development Handbook" for a high school with capacity of 1,500 pupils.
***Equals total site development cost divided by New HS capacity of 1,500 pupils.

Estimated general site development costs for District high school projects are based on the average allowable general site development costs, as defined in Section 1859.76 of Title 2 of the California Code of Regulations. These costs are as follows:

Table C-6
General Site Development Costs for High School Projects

High School Cost Model Projects	Acres	Per-Acre Cost	Pupils	Per-Pupil Cost	Costs
Per-Useable Acre General Site Cost	38.97	$28,728	n/a	n/a	$1,119,530
Per-Pupil General Site Cost	n/a	n/a	1,500	$908*	$1,362,000
Totals	38.97	n/a	1,500	n/a	$2,481,530
Average Per-Pupil General Site Development Cost**					$1,654

*Equals 3.75% of the 9-12 per-pupil base grant amount of $24,200.
**Equals the totals of the General Site Costs, divided by the pupil capacity of the projects.

The total anticipated Site Development Costs for District high school projects equals the per-pupil service site, off-site and utility development cost for the District's high school projects, plus the average per-pupil general site development costs related to the District's high school projects. The following table illustrates the total per-pupil site development costs for future high school projects.

L-15

Table C-7
Total Site Development Costs for High School Projects

High School Projects	Costs
Average Per-Pupil Service Site, Off-Site and Utility Costs	$4,334
Average Per-Pupil General Site Development Costs	$1,654
Total Per-Pupil Site Development Cost	**$5,988**

L-15

Appendix D

Student Generation Rate Study

Please note that for privacy purposes, the street number has been omitted from each record in this developer fee collection database.

L-15

Salinas Union High School District
Calculation of 7-8 and 9-12 Student Generation Rates
for Single- and Multi-Family Housing Units

Single-Family Units

7-8 Matches by Grade Level; 7-12 Service Area Only

		Total Housing Units:	SGR:
7th Grade Matches	43	785	0.055
8th Grade Matches	46	785	0.059
Totals	89	785	0.113

9-12 Matches by Grade Level; 7-12 and 9-12 Service Areas Combined

		Total Housing Units:	SGR:
9th Grade Matches	67	1044	0.064
10th Grade Matches	56	1044	0.054
11th Grade Matches	59	1044	0.057
12th Grade Matches	62	1044	0.059
Totals	244	1044	0.234

Multi-Family Units

7-8 Matches by Grade Level; 7-12 Service Area Only

		Total Housing Units:	SGR:
7th Grade Matches	1	311	0.003
8th Grade Matches	5	311	0.016
Totals	6	311	0.019

9-12 Matches by Grade Level; 7-12 and 9-12 Service Areas Combined

		Total Housing Units:	SGR:
9th Grade Matches	11	579	0.019
10th Grade Matches	7	579	0.012
11th Grade Matches	5	579	0.009
12th Grade Matches	9	579	0.016
Totals	32	579	0.055

L-15

Single-Family Housing Units and Student Matches

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
3/13/03	[redacted]	Provincetown	1	SFU	7-12		1			1	
3/13/03	[redacted]	Provincetown	1	SFU	7-12						
3/13/03	[redacted]	Provincetown	1	SFU	7-12	1	1				
3/13/03	[redacted]	Twincreeks	1	SFU	7-12						
3/13/03	[redacted]	Twincreeks	1	SFU	7-12					1	
3/13/03	[redacted]	Twincreeks	1	SFU	7-12	1					
3/13/03	[redacted]	Twincreeks	1	SFU	7-12						
3/17/03	[redacted]	Arcadia	1	SFU	7-12						
3/17/03	[redacted]	Arcadia	1	SFU	7-12			1			1
3/17/03	[redacted]	Arcadia	1	SFU	7-12			1			
3/17/03	[redacted]	Arcadia	1	SFU	7-12						
3/17/03	[redacted]	Arcadia	1	SFU	7-12					1	
3/17/03	[redacted]	Arcadia	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12		1				
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12		2		2		
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
3/24/03	[redacted]	Bradbury	1	SFU	7-12						
4/23/03	[redacted]	Harrington	1	SFU	7-12	1					
4/23/03	[redacted]	LittleRiver	1	SFU	7-12						
5/2/03	[redacted]	Hyland	1	SFU	7-12						
5/6/03	[redacted]	Arcadia	1	SFU	7-12						
5/5/03	[redacted]	Arcadia	1	SFU	7-12						
5/5/03	[redacted]	Arcadia	1	SFU	7-12						
5/5/03	[redacted]	Arcadia	1	SFU	7-12						1
5/5/03	[redacted]	Arcadia	1	SFU	7-12						
5/5/03	[redacted]	Arcadia	1	SFU	7-12			1			
5/5/03	[redacted]	Arcadia	1	SFU	7-12						
5/5/03	[redacted]	Arcadia	1	SFU	7-12						
5/19/03	[redacted]	Arcadia	1	SFU	7-12						
5/19/03	[redacted]	Arcadia	1	SFU	7-12						
5/19/03	[redacted]	Arcadia	1	SFU	7-12						
5/19/03	[redacted]	Arcadia	1	SFU	7-12						
5/19/03	[redacted]	Arcadia	1	SFU	7-12						
6/11/03	[redacted]	Bradbury	1	SFU	7-12						
6/11/03	[redacted]	Bradbury	1	SFU	7-12						
6/11/03	[redacted]	Bradbury	1	SFU	7-12						
6/11/03	[redacted]	Bradbury	1	SFU	7-12						
6/11/03	[redacted]	Bradbury	1	SFU	7-12	1			1		
6/11/03	[redacted]	Bradbury	1	SFU	7-12						
6/11/03	[redacted]	Bradbury	1	SFU	7-12						
6/11/03	[redacted]	Bradbury	1	SFU	7-12					1	
6/11/03	[redacted]	Bradbury	1	SFU	7-12						1
6/11/03	[redacted]	Bradbury	1	SFU	7-12						
6/11/03	[redacted]	Bradbury	1	SFU	7-12						
6/12/03	[redacted]	Arcadia	1	SFU	7-12						
6/12/03	[redacted]	Arcadia	1	SFU	7-12						
6/12/03	[redacted]	Arcadia	1	SFU	7-12					1	
6/12/03	[redacted]	Arcadia	1	SFU	7-12						
6/12/03	[redacted]	Arcadia	1	SFU	7-12						
6/12/03	[redacted]	Arcadia	1	SFU	7-12						
6/12/03	[redacted]	Arcadia	1	SFU	7-12						
6/12/03	[redacted]	Arcadia	1	SFU	7-12						1
7/14/2003	[redacted]	Rider Ave.	1	SFU	7-12			1			
7/30/2003	[redacted]	Homestead Ave.	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12				1	1	

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12					1	
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12		1				
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/1/2003	[redacted]	Bradbury	1	SFU	7-12						
8/29/2003	[redacted]	Garner Ave.	1	SFU	7-12		1		1		
8/29/2003	[redacted]	Garner Ave.	1	SFU	7-12	2		1	1		
8/29/2003	[redacted]	Garner Ave.	1	SFU	7-12		2			1	
8/29/2003	[redacted]	Garner Ave.	1	SFU	7-12					1	2
9/5/2003	[redacted]	Garner Ave.	1	SFU	7-12	1					
9/5/2003	[redacted]	Garner Ave.	1	SFU	7-12				1		
9/5/2003	[redacted]	Garner Ave.	1	SFU	7-12		1		2	1	1
9/5/2003	[redacted]	Garner Ave.	1	SFU	7-12		1	3		1	
11/5/2003	[redacted]	NewHampshire Ct.	1	SFU	7-12						
11/6/2003	[redacted]	NewHampshire Ct.	1	SFU	7-12						
11/7/2003	[redacted]	Kent Circle	1	SFU	7-12						
11/7/2003	[redacted]	Kent Street	1	SFU	7-12						
11/7/2003	[redacted]	Kent Street	1	SFU	7-12						
11/7/2003	[redacted]	Kent Street	1	SFU	7-12						
11/7/2003	[redacted]	Kent Street	1	SFU	7-12						
11/7/2003	[redacted]	Kent Street	1	SFU	7-12						
11/7/2003	[redacted]	NewHampshire Ct.	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12		1			1	
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
11/12/2003	[redacted]	Bradbury	1	SFU	7-12						
12/1/2003	[redacted]	Arcadia Way	1	SFU	7-12						
12/1/2003	[redacted]	Arcadia Way	1	SFU	7-12						
12/1/2003	[redacted]	Arcadia Way	1	SFU	7-12				1		1
12/1/2003	[redacted]	Arcadia Way	1	SFU	7-12						
12/1/2003	[redacted]	Arcadia Way	1	SFU	7-12						
12/1/2003	[redacted]	Arcadia Way	1	SFU	7-12				1		
12/1/2003	[redacted]	Arcadia Way	1	SFU	7-12						
12/1/2003	[redacted]	Arcadia Way	1	SFU	7-12						
12/15/2003	[redacted]	NewHampshire Ct.	1	SFU	7-12						
12/15/2003	[redacted]	NewHampshire Ct.	1	SFU	7-12						
12/15/2003	[redacted]	NewHampshire Ct.	1	SFU	7-12	1					
12/15/2003	[redacted]	NewHampshire Ct.	1	SFU	7-12						
12/15/2003	[redacted]	NewHampshire Ct.	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12				1		

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12					1	
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12		1				
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/17/2003	[redacted]	Bradbury	1	SFU	7-12						
12/19/2003	[redacted]	Kent Circle	1	SFU	7-12						
12/19/2003	[redacted]	Kent Circle	1	SFU	7-12						
12/19/2003	[redacted]	Kent Circle	1	SFU	7-12						1
12/19/2003	[redacted]	Kent Circle	1	SFU	7-12						
12/19/2003	[redacted]	Kent Circle	1	SFU	7-12			1			
12/19/2003	[redacted]	Kent Circle	1	SFU	7-12			1			
12/19/2003	[redacted]	Kent Circle	1	SFU	7-12						
12/23/2003	[redacted]	Hemingway Drive	1	SFU	7-12						
12/23/2003	[redacted]	Hemingway Drive	1	SFU	7-12						1
1/12/2004	[redacted]	Arcadia Ct.	1	SFU	7-12						
1/12/2004	[redacted]	Arcadia Way	1	SFU	7-12						
1/12/2004	[redacted]	Arcadia Way	1	SFU	7-12						
1/12/2004	[redacted]	Arcadia Way	1	SFU	7-12						
1/12/2004	[redacted]	Arcadia Way	1	SFU	7-12						
1/12/2004	[redacted]	Arcadia Way	1	SFU	7-12			1			
1/12/2004	[redacted]	Arcadia Way	1	SFU	7-12				1		1
1/12/2004	[redacted]	Arcadia Way	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12			1			
3/5/2004	[redacted]	Bradbury	1	SFU	7-12					1	
3/5/2004	[redacted]	Bradbury	1	SFU	7-12				1		
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12				1		
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/5/2004	[redacted]	Bradbury	1	SFU	7-12				1		
3/5/2004	[redacted]	Bradbury	1	SFU	7-12						
3/18/2004	[redacted]	Canario	1	SFU	7-12		1				
3/18/2004	[redacted]	Canario	1	SFU	7-12		1				1
3/18/2004	[redacted]	Canario	1	SFU	7-12				1		
3/18/2004	[redacted]	Canario	1	SFU	7-12						1
3/18/2004	[redacted]	Canario	1	SFU	7-12						
3/18/2004	[redacted]	Canario	1	SFU	7-12						
3/18/2004	[redacted]	Canario	1	SFU	7-12					1	
3/18/2004	[redacted]	Canario	1	SFU	7-12						
3/18/2004	[redacted]	Milano	1	SFU	7-12						
3/18/2004	[redacted]	Milano	1	SFU	7-12		1	1		1	
3/18/2004	[redacted]	Milano	1	SFU	7-12						
3/18/2004	[redacted]	Milano	1	SFU	7-12		1				
3/18/2004	[redacted]	Milano	1	SFU	7-12						
3/18/2004	[redacted]	Milano	1	SFU	7-12						
3/18/2004	[redacted]	Milano	1	SFU	7-12	1					
3/18/2004	[redacted]	Milano	1	SFU	7-12			1			
3/18/2004	[redacted]	Milano	1	SFU	7-12						
3/18/2004	[redacted]	Milano	1	SFU	7-12						1
3/18/2004	[redacted]	Milano	1	SFU	7-12						

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
3/18/2004	[redacted]	Milano	1	SFU	7-12						
3/18/2004		Milano	1	SFU	7-12						
3/18/2004		Milano	1	SFU	7-12						
4/5/2004		OldStage Rd.	1	SFU	7-12						
5/4/2004		Amarillo	1	SFU	7-12				1	1	
5/4/2004		Amarillo	1	SFU	7-12						
5/5/2004		NewHampshire Ct.	1	SFU	7-12						
5/5/2004		NewHampshire Ct.	1	SFU	7-12						
5/5/2004		NewHampshire Ct.	1	SFU	7-12						
5/5/2004		NewHampshire Ct.	1	SFU	7-12						
5/5/2004		NewHampshire Ct.	1	SFU	7-12				1		1
5/5/2004		NewHampshire Ct.	1	SFU	7-12						
5/5/2004		NewHampshire Ct.	1	SFU	7-12						
5/5/2004		NewHampshire Ct.	1	SFU	7-12						
5/10/2004		Bradbury	1	SFU	7-12				1		
5/10/2004		Bradbury	1	SFU	7-12						
5/10/2004		Bradbury	1	SFU	7-12						
5/10/2004		Bradbury	1	SFU	7-12					1	
5/10/2004		Bradbury	1	SFU	7-12						
5/10/2004		Bradbury	1	SFU	7-12						
5/10/2004		Bradbury	1	SFU	7-12						
5/10/2004		Bradbury	1	SFU	7-12						
5/10/2004		Bradbury	1	SFU	7-12						
5/10/2004		Bradbury	1	SFU	7-12						
5/10/2004		Bradbury	1	SFU	7-12						
5/10/2004		Bradbury	1	SFU	7-12						
5/10/2004		Bradbury	1	SFU	7-12						1
5/10/2004		Bradbury	1	SFU	7-12	1					
6/1/2004		Williams Road	1	SFU	7-12						
6/1/2004		Williams Road	1	SFU	7-12						
6/1/2004		Williams Road	1	SFU	7-12						
6/1/2004		Williams Road	1	SFU	7-12						
6/1/2004		Williams Road	1	SFU	7-12						
6/1/2004		Williams Road	1	SFU	7-12						
6/1/2004		Williams Road	1	SFU	7-12						
6/1/2004		Williams Road	1	SFU	7-12						
6/16/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12		1				
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Fitzgearld St.	1	SFU	7-12						
6/28/2004		Hemingway Drive	1	SFU	7-12						
6/28/2004		Hemingway Drive	1	SFU	7-12						
6/28/2004		Hemingway Drive	1	SFU	7-12						
6/28/2004		Hemingway Drive	1	SFU	7-12						
6/28/2004		Hemingway Drive	1	SFU	7-12	1	1				1
6/28/2004		Hemingway Drive	1	SFU	7-12						
6/28/2004		Hemingway Drive	1	SFU	7-12						1
6/28/2004		Hemingway Drive	1	SFU	7-12						
6/28/2004		Hemingway Drive	1	SFU	7-12	1					
6/28/2004		Hemingway Drive	1	SFU	7-12					1	
6/28/2004		Hemingway Drive	1	SFU	7-12	1	1				
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
6/30/2004	[redacted]	Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12	1	1				
7/16/2004		Piazza Dr.	1	SFU	7-12				1		
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/27/2004		NewHampshire Ct.	1	SFU	7-12						
7/27/2004		NewHampshire Ct.	1	SFU	7-12						
7/27/2004		NewHampshire Ct.	1	SFU	7-12	1					
7/27/2004		NewHampshire Ct.	1	SFU	7-12						
7/27/2004		NewHampshire Ct.	1	SFU	7-12						
7/27/2004		NewHampshire Ct.	1	SFU	7-12						
7/27/2004		NewHampshire Ct.	1	SFU	7-12						
7/27/2004		NewHampshire Ct.	1	SFU	7-12						
8/9/2004		Piazza Dr.	1	SFU	7-12						1
8/9/2004		Piazza Dr.	1	SFU	7-12						
8/9/2004		Piazza Dr.	1	SFU	7-12						
8/9/2004		Piazza Dr.	1	SFU	7-12						
8/9/2004		Piazza Dr.	1	SFU	7-12	1					
8/9/2004		Piazza Dr.	1	SFU	7-12	1					
8/9/2004		Piazza Dr.	1	SFU	7-12						
8/9/2004		Piazza Dr.	1	SFU	7-12			1		1	
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/18/2004		Piazza Dr.	1	SFU	7-12		1				
8/18/2004		Piazza Dr.	1	SFU	7-12	1					
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/27/2004		Piazza Dr.	1	SFU	7-12	1			1		
8/27/2004		Piazza Dr.	1	SFU	7-12						
8/27/2004		Piazza Dr.	1	SFU	7-12	1		1			
8/27/2004		Piazza Dr.	1	SFU	7-12					1	
8/27/2004		Piazza Dr.	1	SFU	7-12				1		
8/27/2004		Piazza Dr.	1	SFU	7-12						
8/27/2004		Piazza Dr.	1	SFU	7-12						
8/27/2004		Piazza Dr.	1	SFU	7-12						
9/8/2004		Piazza Dr.	1	SFU	7-12						1
9/8/2004		Piazza Dr.	1	SFU	7-12					1	
9/8/2004		Verona Ct.	1	SFU	7-12			1			
9/8/2004		Verona Ct.	1	SFU	7-12						
9/8/2004		Verona Ct.	1	SFU	7-12						
9/8/2004		Verona Ct.	1	SFU	7-12					1	
9/8/2004		Verona Ct.	1	SFU	7-12			1			
9/8/2004		Verona Ct.	1	SFU	7-12						
9/10/2004		Acosta St.	1	SFU	7-12			1		1	
9/15/2004		Verona Ct.	1	SFU	7-12						
9/15/2004		Verona Ct.	1	SFU	7-12						
9/15/2004		Verona Ct.	1	SFU	7-12	1	1				
9/15/2004		Verona Ct.	1	SFU	7-12						
9/15/2004		Verona Ct.	1	SFU	7-12					1	
9/15/2004		Verona Ct.	1	SFU	7-12						
9/15/2004		Verona Ct.	1	SFU	7-12						

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
9/15/2004	[redacted]	Verona Ct.	1	SFU	7-12						
9/16/2004	[redacted]	Falcon Ridge Rd.	1	SFU	7-12						
10/4/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/4/2004	[redacted]	Verona Ct.	1	SFU	7-12						1
10/4/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/4/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/4/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/4/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/4/2004	[redacted]	Verona Ct.	1	SFU	7-12			1			1
10/4/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/11/2004	[redacted]	Orchard Ave.	1	SFU	7-12						
10/14/2004	[redacted]	Verona Ct.	1	SFU	7-12		1				
10/14/2004	[redacted]	Verona Ct.	1	SFU	7-12			1			
10/14/2004	[redacted]	Verona Ct.	1	SFU	7-12				1		
10/14/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/14/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/14/2004	[redacted]	Verona Ct.	1	SFU	7-12						1
10/14/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/14/2004	[redacted]	Verona Ct.	1	SFU	7-12						1
10/25/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/25/2004	[redacted]	Verona Ct.	1	SFU	7-12						1
10/25/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/25/2004	[redacted]	Verona Ct.	1	SFU	7-12						
10/25/2004	[redacted]	Verona Ct.	1	SFU	7-12						1
10/25/2004	[redacted]	Verona Ct.	1	SFU	7-12				1		
10/25/2004	[redacted]	Verona Ct.	1	SFU	7-12	1		1			
10/25/2004	[redacted]	Verona Ct.	1	SFU	7-12						
11/18/2004	[redacted]	Verona Ct.	1	SFU	7-12						
11/18/2004	[redacted]	Verona Ct.	1	SFU	7-12						
11/18/2004	[redacted]	Verona Ct.	1	SFU	7-12						
11/18/2004	[redacted]	Verona Ct.	1	SFU	7-12		1			1	
11/18/2004	[redacted]	Verona Ct.	1	SFU	7-12						
11/18/2004	[redacted]	Verona Ct.	1	SFU	7-12	1					
11/18/2004	[redacted]	Verona Ct.	1	SFU	7-12	1					
11/18/2004	[redacted]	Verona Ct.	1	SFU	7-12				1		
12/1/2004	[redacted]	Verona Ct.	1	SFU	7-12		1				
12/1/2004	[redacted]	Verona Ct.	1	SFU	7-12						
12/1/2004	[redacted]	Verona Ct.	1	SFU	7-12						
12/1/2004	[redacted]	Verona Ct.	1	SFU	7-12						
12/1/2004	[redacted]	Verona Ct.	1	SFU	7-12		1		1		
12/1/2004	[redacted]	Verona Ct.	1	SFU	7-12						
12/1/2004	[redacted]	Verona Ct.	1	SFU	7-12						
12/1/2004	[redacted]	Verona Ct.	1	SFU	7-12						
12/1/2004	[redacted]	Verona Ct.	1	SFU	7-12						
12/1/2004	[redacted]	Verona Ct.	1	SFU	7-12						
12/1/2004	[redacted]	Verona Ct.	1	SFU	7-12			1			
1/19/2005	[redacted]	Verona Ct.	1	SFU	7-12						
1/19/2005	[redacted]	Verona Ct.	1	SFU	7-12						
1/19/2005	[redacted]	Verona Ct.	1	SFU	7-12					1	1
1/19/2005	[redacted]	Verona Wy.	1	SFU	7-12						
1/19/2005	[redacted]	Verona Wy.	1	SFU	7-12						
1/19/2005	[redacted]	Verona Wy.	1	SFU	7-12						
2/22/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
2/22/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
2/22/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
2/22/2005	[redacted]	Piazza Dr.	1	SFU	7-12		1		1		
2/22/2005	[redacted]	Verona Wy.	1	SFU	7-12						
2/25/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
2/25/2005	[redacted]	Piazza Dr.	1	SFU	7-12		1				
2/25/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
2/25/2005	[redacted]	Piazza Dr.	1	SFU	7-12			1			
2/25/2005	[redacted]	Piazza Dr.	1	SFU	7-12		1			1	1
2/25/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
2/25/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
2/25/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
2/25/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
3/10/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
3/10/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
3/10/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
3/10/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
3/10/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
3/10/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
3/10/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
3/10/2005	[redacted]	Piazza Dr.	1	SFU	7-12						
3/25/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
3/25/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
3/25/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
3/25/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
3/25/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
3/25/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
3/28/2005	[redacted]	Soledad St.	1	SFU	7-12						
4/12/2005	[redacted]	Foothill Dr.	1	SFU	7-12						
4/18/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
4/18/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
4/18/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
4/18/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
4/18/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
4/18/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
4/18/2005	[redacted]	Arrezzo Cir.	1	SFU	7-12						
4/18/2005	[redacted]	Genoa	1	SFU	7-12						
4/19/2005	[redacted]	Siena Way	1	SFU	7-12						
4/19/2005	[redacted]	Siena Way	1	SFU	7-12						
4/19/2005	[redacted]	Siena Way	1	SFU	7-12						
4/19/2005	[redacted]	Siena Way	1	SFU	7-12						1
4/19/2005	[redacted]	Siena Way	1	SFU	7-12						
5/27/2005	[redacted]	Canelli	1	SFU	7-12						
5/27/2005	[redacted]	Canelli	1	SFU	7-12						1
5/27/2005	[redacted]	Canelli	1	SFU	7-12						
5/27/2005	[redacted]	Canelli	1	SFU	7-12						
5/27/2005	[redacted]	Canelli	1	SFU	7-12						
5/27/2005	[redacted]	Canelli	1	SFU	7-12					1	
5/27/2005	[redacted]	Canelli	1	SFU	7-12						
5/27/2005	[redacted]	Canelli	1	SFU	7-12						
5/27/2005	[redacted]	Canelli	1	SFU	7-12			1	1		1
5/27/2005	[redacted]	Canelli	1	SFU	7-12						
5/27/2005	[redacted]	Canelli	1	SFU	7-12						
5/27/2005	[redacted]	Canelli	1	SFU	7-12				1		
5/27/2005	[redacted]	Canelli	1	SFU	7-12					1	
5/27/2005	[redacted]	Canelli	1	SFU	7-12						
5/27/2005	[redacted]	Canelli	1	SFU	7-12						
5/27/2005	[redacted]	Canelli	1	SFU	7-12	1					
6/14/2005	[redacted]	Belmont	1	SFU	7-12						
6/14/2005	[redacted]	Belmont Circle	1	SFU	7-12						
6/14/2005	[redacted]	Canelli	1	SFU	7-12						
6/14/2005	[redacted]	Canelli	1	SFU	7-12		1		1		
6/14/2005	[redacted]	Canelli	1	SFU	7-12						
6/14/2005	[redacted]	Canelli	1	SFU	7-12						
6/14/2005	[redacted]	Canelli	1	SFU	7-12						
6/14/2005	[redacted]	Canelli	1	SFU	7-12				1		
6/14/2005	[redacted]	Canelli	1	SFU	7-12						
6/14/2005	[redacted]	Canelli	1	SFU	7-12			1		1	1
6/14/2005	[redacted]	Canelli	1	SFU	7-12						
6/14/2005	[redacted]	Canelli	1	SFU	7-12					1	
6/14/2005	[redacted]	Canelli	1	SFU	7-12						
6/14/2005	[redacted]	Canelli	1	SFU	7-12			1	1		
6/14/2005	[redacted]	Canelli	1	SFU	7-12						
6/14/2005	[redacted]	Canelli	1	SFU	7-12						
6/14/2005	[redacted]	Canelli	1	SFU	7-12				1		
6/14/2005	[redacted]	Canelli	1	SFU	7-12					1	
6/28/2005	[redacted]	Canelli	1	SFU	7-12						
6/28/2005	[redacted]	Canelli	1	SFU	7-12			1			
6/28/2005	[redacted]	Canelli	1	SFU	7-12						
6/28/2005	[redacted]	Canelli	1	SFU	7-12						
6/28/2005	[redacted]	Canelli	1	SFU	7-12						
6/28/2005	[redacted]	Canelli	1	SFU	7-12						
6/28/2005	[redacted]	Canelli	1	SFU	7-12						

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
6/28/2005	[redacted]	Canelli	1	SFU	7-12						
6/28/2005	[redacted]	Canelli	1	SFU	7-12						
6/28/2005	[redacted]	Canelli	1	SFU	7-12		1			1	
6/28/2005	[redacted]	Canelli	1	SFU	7-12						
6/28/2005	[redacted]	Canelli	1	SFU	7-12			1		1	
6/28/2005	[redacted]	Canelli	1	SFU	7-12						
6/28/2005	[redacted]	Canelli	1	SFU	7-12						
6/28/2005	[redacted]	Canelli	1	SFU	7-12						1
6/28/2005	[redacted]	Canelli	1	SFU	7-12						
7/7/2005	[redacted]	Amarillo	1	SFU	7-12						
7/7/2005	[redacted]	Amarillo	1	SFU	7-12	1					
7/7/2005	[redacted]	Amarillo	1	SFU	7-12	1					
7/7/2005	[redacted]	Amarillo	1	SFU	7-12		1				
7/7/2005	[redacted]	Amarillo	1	SFU	7-12						
7/7/2005	[redacted]	Amarillo	1	SFU	7-12	1				1	
7/7/2005	[redacted]	Amarillo	1	SFU	7-12						
7/7/2005	[redacted]	Amarillo	1	SFU	7-12						
7/7/2005	[redacted]	Amarillo	1	SFU	7-12						
7/7/2005	[redacted]	Amarillo	1	SFU	7-12	1					
7/7/2005	[redacted]	Amarillo	1	SFU	7-12						
7/7/2005	[redacted]	Pacific	1	SFU	7-12	1				1	
7/7/2005	[redacted]	Pacific	1	SFU	7-12					1	
7/7/2005	[redacted]	Pacific	1	SFU	7-12						
7/8/2005	[redacted]	Canelli	1	SFU	7-12				1		1
7/8/2005	[redacted]	Canelli	1	SFU	7-12						
7/8/2005	[redacted]	Canelli	1	SFU	7-12						
7/8/2005	[redacted]	Canelli	1	SFU	7-12						
7/8/2005	[redacted]	Canelli	1	SFU	7-12						
7/8/2005	[redacted]	Canelli	1	SFU	7-12						
7/8/2005	[redacted]	Canelli	1	SFU	7-12						
7/8/2005	[redacted]	Laurel	1	SFU	7-12			1			
7/8/2005	[redacted]	Spoleto	1	SFU	7-12						
7/8/2005	[redacted]	Spoleto	1	SFU	7-12	1					1
7/8/2005	[redacted]	Spoleto	1	SFU	7-12						
7/8/2005	[redacted]	Spoleto	1	SFU	7-12						
7/8/2005	[redacted]	Spoleto	1	SFU	7-12						
7/8/2005	[redacted]	Spoleto	1	SFU	7-12						
7/8/2005	[redacted]	Spoleto	1	SFU	7-12						1
7/8/2005	[redacted]	Spoleto	1	SFU	7-12						
7/21/2005	[redacted]	Spoleto	1	SFU	7-12						1
7/21/2005	[redacted]	Spoleto	1	SFU	7-12						
7/21/2005	[redacted]	Spoleto	1	SFU	7-12						
7/21/2005	[redacted]	Spoleto	1	SFU	7-12						
7/21/2005	[redacted]	Spoleto	1	SFU	7-12						
7/21/2005	[redacted]	Spoleto	1	SFU	7-12			1			1
7/21/2005	[redacted]	Spoleto	1	SFU	7-12						
7/21/2005	[redacted]	Spoleto	1	SFU	7-12						
7/21/2005	[redacted]	Spoleto	1	SFU	7-12			1			
7/21/2005	[redacted]	Spoleto	1	SFU	7-12		1				
7/21/2005	[redacted]	Spoleto	1	SFU	7-12						
7/21/2005	[redacted]	Spoleto	1	SFU	7-12			1			
7/21/2005	[redacted]	Spoleto	1	SFU	7-12						
7/21/2005	[redacted]	Spoleto	1	SFU	7-12						
7/21/2005	[redacted]	Spoleto	1	SFU	7-12	1			1		
7/21/2005	[redacted]	Spoleto	1	SFU	7-12				1		
8/10/2005	[redacted]	Cassino	1	SFU	7-12						
8/10/2005	[redacted]	Cassino	1	SFU	7-12						
8/10/2005	[redacted]	Cassino	1	SFU	7-12						
8/10/2005	[redacted]	Cassino	1	SFU	7-12						
8/10/2005	[redacted]	Cassino	1	SFU	7-12						
8/10/2005	[redacted]	Cassino	1	SFU	7-12		1				
8/10/2005	[redacted]	Cassino	1	SFU	7-12						
8/10/2005	[redacted]	Cassino	1	SFU	7-12	1					
8/10/2005	[redacted]	Cassino	1	SFU	7-12						1
8/10/2005	[redacted]	Cassino	1	SFU	7-12						
8/10/2005	[redacted]	Cassino	1	SFU	7-12						
8/10/2005	[redacted]	Spoleto	1	SFU	7-12					1	
8/10/2005	[redacted]	Spoleto	1	SFU	7-12						

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
8/10/2005	[redacted]	Spoleto	1	SFU	7-12						
8/10/2005	[redacted]	Spoleto	1	SFU	7-12						
8/10/2005	[redacted]	Tuscany	1	SFU	7-12						
9/13/2005	[redacted]	Cassino	1	SFU	7-12						
9/13/2005	[redacted]	Cassino	1	SFU	7-12			1			1
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12			1			
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12				1	1	
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12				1		
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12	1					
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12		1				
9/13/2005	[redacted]	Spoleto	1	SFU	7-12			1			
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/13/2005	[redacted]	Spoleto	1	SFU	7-12						
9/21/2005	[redacted]	Cross	1	SFU	7-12		1				
10/10/2005	[redacted]	Cassino	1	SFU	7-12						
10/10/2005	[redacted]	Cassino	1	SFU	7-12						
10/10/2005	[redacted]	Cassino	1	SFU	7-12						
10/10/2005	[redacted]	Cassino	1	SFU	7-12	1					
10/10/2005	[redacted]	Cassino	1	SFU	7-12						1
10/10/2005	[redacted]	Cassino	1	SFU	7-12			1			
10/10/2005	[redacted]	Cassino	1	SFU	7-12						
10/10/2005	[redacted]	Cassino	1	SFU	7-12						
10/10/2005	[redacted]	Cassino	1	SFU	7-12						
10/10/2005	[redacted]	Cassino	1	SFU	7-12						
10/10/2005	[redacted]	Spoleto	1	SFU	7-12						
10/10/2005	[redacted]	Spoleto	1	SFU	7-12						
10/10/2005	[redacted]	Spoleto	1	SFU	7-12						
10/10/2005	[redacted]	Spoleto	1	SFU	7-12						1
10/10/2005	[redacted]	Spoleto	1	SFU	7-12						
10/10/2005	[redacted]	Spoleto	1	SFU	7-12						
10/10/2005	[redacted]	Spoleto	1	SFU	7-12						
10/10/2005	[redacted]	Spoleto	1	SFU	7-12						
10/25/2005	[redacted]	Greenwood	1	SFU	7-12						
1/6/2006	[redacted]	Sanborn	1	SFU	7-12			1			
3/7/2006	[redacted]	Fuji	1	SFU	7-12						
3/7/2006	[redacted]	Padova	1	SFU	7-12						
3/7/2006	[redacted]	Padova	1	SFU	7-12						
3/7/2006	[redacted]	Padova	1	SFU	7-12						
3/7/2006	[redacted]	Padova	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12			1		1	
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/5/2006	[redacted]	Palermo	1	SFU	7-12						
4/28/2006	[redacted]	Modena	1	SFU	7-12						
4/28/2006	[redacted]	Modena	1	SFU	7-12						

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
4/28/2006	[redacted]	Modena	1	SFU	7-12						
4/28/2006	[redacted]	Modena	1	SFU	7-12						
4/28/2006	[redacted]	Modena	1	SFU	7-12		1				
4/28/2006	[redacted]	Modena	1	SFU	7-12						
4/28/2006	[redacted]	Modena	1	SFU	7-12				1		
4/28/2006	[redacted]	Modena	1	SFU	7-12						
4/28/2006	[redacted]	Modena	1	SFU	7-12			1			1
4/28/2006	[redacted]	Modena	1	SFU	7-12						
4/28/2006	[redacted]	Modena	1	SFU	7-12					1	1
4/28/2006	[redacted]	Modena	1	SFU	7-12				1		
4/28/2006	[redacted]	Modena	1	SFU	7-12						
4/28/2006	[redacted]	Modena	1	SFU	7-12						
4/28/2006	[redacted]	Modena	1	SFU	7-12						1
5/22/2006	[redacted]	Bologna	1	SFU	7-12			1			
5/22/2006	[redacted]	Piazza	1	SFU	7-12	1					
5/22/2006	[redacted]	Piazza	1	SFU	7-12						
5/22/2006	[redacted]	Piazza	1	SFU	7-12					1	
5/22/2006	[redacted]	Piazza	1	SFU	7-12						1
5/22/2006	[redacted]	Piazza	1	SFU	7-12						
5/22/2006	[redacted]	Piazza	1	SFU	7-12						
5/22/2006	[redacted]	Piazza	1	SFU	7-12			1		1	
5/22/2006	[redacted]	Piazza	1	SFU	7-12						
5/22/2006	[redacted]	Piazza	1	SFU	7-12	1					
5/22/2006	[redacted]	Piazza	1	SFU	7-12			1			
5/22/2006	[redacted]	Piazza	1	SFU	7-12						
5/22/2006	[redacted]	Piazza	1	SFU	7-12					1	
5/22/2006	[redacted]	Piazza	1	SFU	7-12		1				
5/22/2006	[redacted]	Piazza	1	SFU	7-12						
5/22/2006	[redacted]	Piazza	1	SFU	7-12						
5/24/2006	[redacted]	Modena	1	SFU	7-12						
5/24/2006	[redacted]	Modena	1	SFU	7-12			1		1	
5/24/2006	[redacted]	Modena	1	SFU	7-12						
5/24/2006	[redacted]	Modena	1	SFU	7-12						1
5/24/2006	[redacted]	Modena	1	SFU	7-12						
5/24/2006	[redacted]	Modena	1	SFU	7-12	1		1			
5/24/2006	[redacted]	Modena	1	SFU	7-12		1			2	
5/24/2006	[redacted]	Modena	1	SFU	7-12						
5/24/2006	[redacted]	Modena	1	SFU	7-12						
5/24/2006	[redacted]	Modena	1	SFU	7-12			1			
5/24/2006	[redacted]	Modena	1	SFU	7-12						
5/24/2006	[redacted]	Modena	1	SFU	7-12						
5/24/2006	[redacted]	Modena	1	SFU	7-12						
5/24/2006	[redacted]	Modena	1	SFU	7-12						
6/28/2006	[redacted]	Bologna	1	SFU	7-12						
6/28/2006	[redacted]	Bologna	1	SFU	7-12						
6/28/2006	[redacted]	Bologna	1	SFU	7-12	1	1				
6/28/2006	[redacted]	Bologna	1	SFU	7-12						
6/28/2006	[redacted]	Bologna	1	SFU	7-12						
6/28/2006	[redacted]	Capri	1	SFU	7-12						
6/28/2006	[redacted]	Capri	1	SFU	7-12						
6/28/2006	[redacted]	Capri	1	SFU	7-12						
6/28/2006	[redacted]	Capri	1	SFU	7-12						
6/28/2006	[redacted]	Capri	1	SFU	7-12	1				1	
6/28/2006	[redacted]	Capri	1	SFU	7-12			1			
6/28/2006	[redacted]	Capri	1	SFU	7-12						
6/28/2006	[redacted]	Capri	1	SFU	7-12						
6/28/2006	[redacted]	Capri	1	SFU	7-12						1
6/28/2006	[redacted]	Capri	1	SFU	7-12	1	1		1		
6/28/2006	[redacted]	Capri	1	SFU	7-12						
7/25/2006	[redacted]	Carbonero St.	1	SFU	7-12						
7/25/2006	[redacted]	Carbonero St.	1	SFU	7-12						
7/26/2006	[redacted]	Campania Way	1	SFU	7-12					1	
7/26/2006	[redacted]	Campania Way	1	SFU	7-12						
7/26/2006	[redacted]	Campania Way	1	SFU	7-12						
7/26/2006	[redacted]	Campania Way	1	SFU	7-12						
7/26/2006	[redacted]	Campania Way	1	SFU	7-12		1				
7/26/2006	[redacted]	Campania Way	1	SFU	7-12						
7/26/2006	[redacted]	Campania Way	1	SFU	7-12						

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
7/26/2006	[redacted]	Campania Way	1	SFU	7-12						
7/26/2006	[redacted]	Campania Way	1	SFU	7-12						
7/26/2006	[redacted]	Campania Way	1	SFU	7-12		1				
7/26/2006	[redacted]	Campania Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
7/26/2006	[redacted]	Trivoli Way	1	SFU	7-12						
8/22/2006	[redacted]	Madeira Ave. N	1	SFU	7-12	1	1	1	1		
8/23/2006	[redacted]	Fontes Lane	1	SFU	7-12						
8/24/2006	[redacted]	Carbonero St.	1	SFU	7-12						1
8/24/2006	[redacted]	Carbonero St.	1	SFU	7-12						
8/24/2006	[redacted]	Carbonero St.	1	SFU	7-12						
8/24/2006	[redacted]	Carbonero St.	1	SFU	7-12						
8/25/2006	[redacted]	Tuscany	1	SFU	7-12						
9/20/2006	[redacted]	Bologna Ct.	1	SFU	7-12			1			
9/20/2006	[redacted]	Bologna Ct.	1	SFU	7-12				1		1
9/20/2006	[redacted]	Bologna Ct.	1	SFU	7-12						
9/20/2006	[redacted]	Bologna Ct.	1	SFU	7-12						
9/20/2006	[redacted]	Bologna Way	1	SFU	7-12						
9/20/2006	[redacted]	Bologna Way	1	SFU	7-12						
9/20/2006	[redacted]	Bologna Way	1	SFU	7-12			1		1	
9/20/2006	[redacted]	Bologna Way	1	SFU	7-12						1
9/29/2006	[redacted]	Oak St.	1	SFU	7-12						
10/16/2006	[redacted]	Abbott St.	1	SFU	7-12						
11/29/2006	[redacted]	Bologna Way	1	SFU	7-12			1			
11/29/2006	[redacted]	Bologna Way	1	SFU	7-12						
11/29/2006	[redacted]	Bologna Way	1	SFU	7-12						
11/29/2006	[redacted]	Bologna Way	1	SFU	7-12						
11/29/2006	[redacted]	Bologna Way	1	SFU	7-12						
11/29/2006	[redacted]	Bologna Way	1	SFU	7-12						
11/29/2006	[redacted]	Bologna Way	1	SFU	7-12						
11/29/2006	[redacted]	Bologna Way	1	SFU	7-12						
12/6/2006	[redacted]	Bologna Ct.	1	SFU	7-12						
12/6/2006	[redacted]	Bologna Ct.	1	SFU	7-12						
12/6/2006	[redacted]	Bologna Ct.	1	SFU	7-12				1		
12/6/2006	[redacted]	Bologna Ct.	1	SFU	7-12						
12/6/2006	[redacted]	Bologna Ct.	1	SFU	7-12			1			
12/6/2006	[redacted]	Bologna Ct.	1	SFU	7-12				1		
12/6/2006	[redacted]	Bologna Ct.	1	SFU	7-12						
12/6/2006	[redacted]	Bologna Ct.	1	SFU	7-12						
4/17/2007	[redacted]	Eagles Roost Rd.	1	SFU	7-12						
5/29/2007	[redacted]	Wiren St. #A (2nd Dwelling)	1	SFU	7-12						
6/21/2007	[redacted]	Burke St. (2nd dwelling)	1	SFU	7-12						
7/26/2007	[redacted]	Saint George Dr.	1	SFU	7-12						
7/26/2007	[redacted]	Saint George Dr.	1	SFU	7-12						
7/26/2007	[redacted]	Saint George Dr.	1	SFU	7-12						
7/26/2007	[redacted]	Saint George Dr.	1	SFU	7-12						
8/6/2007	[redacted]	Addington Lane #A (Graves Dist.)	1	SFU	7-12	1	1				
8/23/2007	[redacted]	Bolero Ave. #A (2nd Dwelling)	1	SFU	7-12						
8/30/2007	[redacted]	Bologna Ct.	1	SFU	7-12						

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
8/30/2007	[redacted]	Bologna Ct.	1	SFU	7-12						
8/30/2007		Bologna Ct.	1	SFU	7-12						
8/30/2007		Bologna Ct.	1	SFU	7-12						
9/4/2007		Chaparral St. #A (2nd Dwelling)	1	SFU	7-12			1			
9/5/2007		Genoa Way	1	SFU	7-12						
9/5/2007		Genoa Way	1	SFU	7-12						
9/5/2007		Genoa Way	1	SFU	7-12						
9/5/2007		Genoa Way	1	SFU	7-12						
9/26/2007		Bologna Ct.	1	SFU	7-12						
9/26/2007		Bologna Ct.	1	SFU	7-12						
9/26/2007		Bologna Way	1	SFU	7-12						
9/26/2007		Bologna Way	1	SFU	7-12						
9/26/2007		Bologna Way	1	SFU	7-12						
9/26/2007		Sienna Way	1	SFU	7-12						
9/26/2007		Sienna Way	1	SFU	7-12						
9/26/2007		Sienna Way	1	SFU	7-12						
9/26/2007		Sienna Way	1	SFU	7-12						
9/26/2007		Sienna Way	1	SFU	7-12						
9/26/2007		Sienna Way	1	SFU	7-12						
9/26/2007		Sienna Way	1	SFU	7-12						
9/26/2007		Sienna Way	1	SFU	7-12						
11/13/2007		Capri Way	1	SFU	7-12						
11/13/2007		Capri Way	1	SFU	7-12						
11/13/2007		Capri Way	1	SFU	7-12						
11/13/2007		Capri Way	1	SFU	7-12						
11/13/2007		Capri Way	1	SFU	7-12						
11/13/2007		Capri Way	1	SFU	7-12						
11/13/2007		Piazza Dr.	1	SFU	7-12						
11/13/2007		Piazza Dr.	1	SFU	7-12						
11/28/2007		Capri Wy	1	SFU	7-12						
11/28/2007		Capri Wy	1	SFU	7-12						
11/28/2007		Capri Wy	1	SFU	7-12						
11/28/2007		Capri Wy	1	SFU	7-12						
11/28/2007		Capri Wy	1	SFU	7-12						
11/28/2007		Capri Wy	1	SFU	7-12						
11/28/2007		Capri Wy	1	SFU	7-12						
11/28/2007		Capri Wy	1	SFU	7-12						
12/3/2007		Cedar St. #A (studio)	1	SFU	7-12			1			
12/21/2007		Maple St. #A (2nd dwelling)	1	SFU	7-12						2
		Sub-Total 7-12 Service Area:	785			43	46	54	46	51	53

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
3/17/03	[redacted]	Buckingham	1	SFU	9-12					1	
5/5/03		Belmont	1	SFU	9-12						
7/1/2003		Kent Street	1	SFU	9-12						
7/1/2003		Kent Street	1	SFU	9-12						
7/1/2003		Kent Street	1	SFU	9-12						
7/1/2003		Kent Street	1	SFU	9-12				1		1
7/1/2003		Kent Street	1	SFU	9-12						
7/1/2003		Kent Street	1	SFU	9-12						
7/1/2003		Kent Street	1	SFU	9-12						
7/17/2003		CorralDeTierra Rd.	1	SFU	9-12						
7/30/2003		RanchitoDelRio Rd.	1	SFU	9-12						
8/13/2003		Pasadera Court	1	SFU	9-12						
8/13/2003		PaseoEstribo	1	SFU	9-12						
9/5/2003		Kent Street	1	SFU	9-12						
9/5/2003		Kent Street	1	SFU	9-12						
9/5/2003		Kent Street	1	SFU	9-12						
9/5/2003		Kent Street	1	SFU	9-12						
9/5/2003		Kent Street	1	SFU	9-12						
9/5/2003		Kent Street	1	SFU	9-12						
9/5/2003		Kent Street	1	SFU	9-12						
9/5/2003		Kent Street	1	SFU	9-12						
9/5/2003		Kent Street	1	SFU	9-12						
9/5/2003		Kent Street	1	SFU	9-12						
9/5/2003		Klamath Dr.	1	SFU	9-12						

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
9/5/2003	[redacted]	Klamath Dr.	1	SFU	9-12			1			
9/5/2003		Klamath Dr.	1	SFU	9-12						
9/5/2003		Klamath Dr.	1	SFU	9-12						
9/5/2003		Klamath Dr.	1	SFU	9-12						
9/5/2003		Klamath Dr.	1	SFU	9-12			1			
9/11/2003		Saddle Rd.	1	SFU	9-12						
9/18/2003		Colt Ln.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12						1
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12				1		1
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12					1	1
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12			1			1
9/25/2003		Arcadia Way	1	SFU	9-12					1	
9/25/2003		Arcadia Way	1	SFU	9-12						
9/25/2003		Arcadia Way	1	SFU	9-12						
9/25/2003		Arcadia Way	1	SFU	9-12				1		
9/25/2003		Arcadia Way	1	SFU	9-12						
9/25/2003		Arcadia Way	1	SFU	9-12						
9/25/2003		Arcadia Way	1	SFU	9-12				1		
9/25/2003		Arcadia Way	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12				1		
10/13/2003		Kent Street	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12						1
10/13/2003		Kent Street	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12						
10/24/2003		Arcadia Way	1	SFU	9-12					1	
10/24/2003		Arcadia Way	1	SFU	9-12			2		1	
10/24/2003		Arcadia Way	1	SFU	9-12				1		
10/24/2003		Arcadia Way	1	SFU	9-12						
10/24/2003		Arcadia Way	1	SFU	9-12						
10/24/2003		Arcadia Way	1	SFU	9-12						
10/28/2003		Casiano Dr.	1	SFU	9-12						
11/5/2003		EstrellaD'oro	1	SFU	9-12						
11/10/2003		LaurelesGrade	1	SFU	9-12						
11/24/2003		Pasadera Ct.	1	SFU	9-12						
12/2/2003		CuestaVerde Dr.	1	SFU	9-12						
12/8/2003		Lucie Lane	1	SFU	9-12						
1/7/2004		SanBenancio Canyon	1	SFU	9-12						
1/16/2004		Berry Rd.	1	SFU	9-12						
1/21/2004		ViaDelMilagro	1	SFU	9-12						
1/26/2004		LaurelesGrade	1	SFU	9-12						
1/28/2004		Berry Rd.	1	SFU	9-12						
1/29/2004		SanJon Rd.	1	SFU	9-12						
2/3/2004		CorralDeTierra Rd.	1	SFU	9-12						
2/6/2004		Monterey Hwy	1	SFU	9-12						
3/9/2004		LaurelesGrade	1	SFU	9-12						
3/22/2004		CaminoEscondido	1	SFU	9-12						
4/12/2004		Reservation Rd.	1	SFU	9-12						
5/14/2004		SanBenancio Rd.	1	SFU	9-12						
5/18/2004		ValleSanJuan Dr	1	SFU	9-12						1
6/2/2004		Middlefield Rd.	1	SFU	9-12						
6/5/2004		Robley Rd.	1	SFU	9-12						

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
6/10/2004	[redacted]	River Rd.	1	SFU	9-12	[redacted]	[redacted]	1			
6/24/2004	[redacted]	Spur Road	1	SFU	9-12	[redacted]	[redacted]				
6/28/2004	[redacted]	RolandCanyon Rd.	1	SFU	9-12	[redacted]	[redacted]				
7/8/2004	[redacted]	EstrellaD'oro	1	SFU	9-12	[redacted]	[redacted]				
8/16/2004	[redacted]	UpperFourty Dr.	1	SFU	9-12	[redacted]	[redacted]				
8/18/2004	[redacted]	ElCaminoDeChamisal	1	SFU	9-12	[redacted]	[redacted]				
8/19/2004	[redacted]	Tesoro Ct.	1	SFU	9-12	[redacted]	[redacted]				
9/21/2004	[redacted]	ValleSanJuan Dr	1	SFU	9-12	[redacted]	[redacted]				
10/22/2004	[redacted]	BoldRuler Ln.	1	SFU	9-12	[redacted]	[redacted]				
11/11/2004	[redacted]	CorralDeTierra	1	SFU	9-12	[redacted]	[redacted]				
11/15/2004	[redacted]	BoldRiverLand	1	SFU	9-12	[redacted]	[redacted]				
11/24/2004	[redacted]	LaTerraza Ct.	1	SFU	9-12	[redacted]	[redacted]				
1/5/2005	[redacted]	CastleRock Rd.	1	SFU	9-12	[redacted]	[redacted]				
2/7/2005	[redacted]	Tesoro Rd.	1	SFU	9-12	[redacted]	[redacted]				
2/22/2005	[redacted]	Belmont Circle	1	SFU	9-12	[redacted]	[redacted]				
3/22/2005	[redacted]	CorralDelCielo	1	SFU	9-12	[redacted]	[redacted]				
3/22/2005	[redacted]	CorteDiego	1	SFU	9-12	[redacted]	[redacted]				
3/29/2005	[redacted]	Estrella Ave.	1	SFU	9-12	[redacted]	[redacted]				
4/6/2005	[redacted]	Belmont Circle	1	SFU	9-12	[redacted]	[redacted]				
4/6/2005	[redacted]	Belmont Circle	1	SFU	9-12	[redacted]	[redacted]				
4/13/2005	[redacted]	Belavida Rd.	1	SFU	9-12	[redacted]	[redacted]				
4/15/2005	[redacted]	CorralDeTierra	1	SFU	9-12	[redacted]	[redacted]		1		
5/3/2005	[redacted]	SanBenacio Rd.	1	SFU	9-12	[redacted]	[redacted]	1			
5/10/2005	[redacted]	Belmont Circle	1	SFU	9-12	[redacted]	[redacted]			1	
5/20/2005	[redacted]	Riverview Ct.	1	SFU	9-12	[redacted]	[redacted]				
5/23/2005	[redacted]	Tesoro Rd.	1	SFU	9-12	[redacted]	[redacted]				
5/31/2005	[redacted]	Tesoro	1	SFU	9-12	[redacted]	[redacted]				
5/31/2005	[redacted]	Tesoro Ct.	1	SFU	9-12	[redacted]	[redacted]				
6/1/2005	[redacted]	Maravilla	1	SFU	9-12	[redacted]	[redacted]				
6/21/2005	[redacted]	Assisi	1	SFU	9-12	[redacted]	[redacted]				
6/21/2005	[redacted]	Assisi Way	1	SFU	9-12	[redacted]	[redacted]				
6/24/2005	[redacted]	Zdan	1	SFU	9-12	[redacted]	[redacted]				
7/1/2005	[redacted]	Belmont	1	SFU	9-12	[redacted]	[redacted]				
8/5/2005	[redacted]	ViaDelMilagro	1	SFU	9-12	[redacted]	[redacted]				
8/22/2005	[redacted]	ViaDelCastillo	1	SFU	9-12	[redacted]	[redacted]				
8/23/2005	[redacted]	PuertaDelCajon	1	SFU	9-12	[redacted]	[redacted]				
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]				
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]				
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]				
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]	2			
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]	1			
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]				
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]				
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]		1		
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]				
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]				
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]		1		
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]				
8/24/2005	[redacted]	Cassino	1	SFU	9-12	[redacted]	[redacted]				
8/24/2005	[redacted]	Spoleto	1	SFU	9-12	[redacted]	[redacted]			1	
8/24/2005	[redacted]	Spoleto	1	SFU	9-12	[redacted]	[redacted]				
8/24/2005	[redacted]	Spoleto	1	SFU	9-12	[redacted]	[redacted]				
8/30/2005	[redacted]	ViaDelMilagro	1	SFU	9-12	[redacted]	[redacted]				
9/16/2005	[redacted]	CaleraCanyon	1	SFU	9-12	[redacted]	[redacted]				
9/29/2005	[redacted]	SanBenancioCanyon	1	SFU	9-12	[redacted]	[redacted]				
9/30/2005	[redacted]	Riverview	1	SFU	9-12	[redacted]	[redacted]				
10/24/2005	[redacted]	Belmont	1	SFU	9-12	[redacted]	[redacted]				
10/26/2005	[redacted]	Mirador	1	SFU	9-12	[redacted]	[redacted]				
12/14/2005	[redacted]	Laureles	1	SFU	9-12	[redacted]	[redacted]				
1/18/2006	[redacted]	SanBenancioCanyon	1	SFU	9-12	[redacted]	[redacted]				
1/19/2006	[redacted]	Belmont	1	SFU	9-12	[redacted]	[redacted]				
2/28/2006	[redacted]	CorralDeTierra	1	SFU	9-12	[redacted]	[redacted]				
3/6/2006	[redacted]	Riverview	1	SFU	9-12	[redacted]	[redacted]				
3/8/2006	[redacted]	SanBenancioCanyon	1	SFU	9-12	[redacted]	[redacted]				
5/8/2006	[redacted]	ViaDelMilagro	1	SFU	9-12	[redacted]	[redacted]				
5/12/2006	[redacted]	Pasadera	1	SFU	9-12	[redacted]	[redacted]				
6/26/2006	[redacted]	Manzanita	1	SFU	9-12	[redacted]	[redacted]				
7/7/2006	[redacted]	Pasadera	1	SFU	9-12	[redacted]	[redacted]				

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
7/7/2006	[redacted]	Soto Pl	1	SFU	9-12	[redacted]	[redacted]	1		1	
7/10/2006	[redacted]	Jasmine Ct.	1	SFU	9-12	[redacted]	[redacted]				
8/2/2006	[redacted]	Pasadera Ct.	1	SFU	9-12	[redacted]	[redacted]				
8/10/2006	[redacted]	Pasadera Ct.	1	SFU	9-12	[redacted]	[redacted]				
9/7/2006	[redacted]	Zabala Rd.	1	SFU	9-12	[redacted]	[redacted]				
10/17/2006	[redacted]	ViaDelMilagro	1	SFU	9-12	[redacted]	[redacted]				
10/20/2006	[redacted]	HiddenValley Rd.	1	SFU	9-12	[redacted]	[redacted]				
11/9/2006	[redacted]	PineCanyon Rd.	1	SFU	9-12	[redacted]	[redacted]				
12/4/2006	[redacted]	Pasadera Ct.	1	SFU	9-12	[redacted]	[redacted]				
12/4/2006	[redacted]	ViaDelMilagro	1	SFU	9-12	[redacted]	[redacted]				
12/8/2006	[redacted]	CrazyHorse Cyn.	1	SFU	9-12	[redacted]	[redacted]				
1/2/2007	[redacted]	Pasadera Dr.	1	SFU	9-12	[redacted]	[redacted]				
1/12/2007	[redacted]	SanBenancio	1	SFU	9-12	[redacted]	[redacted]		1		
1/19/2007	[redacted]	Covey Lane	1	SFU	9-12	[redacted]	[redacted]				
1/23/2007	[redacted]	Riverview Ct.	1	SFU	9-12	[redacted]	[redacted]				
2/20/2007	[redacted]	Pasadera Dr.	1	SFU	9-12	[redacted]	[redacted]				
4/30/2007	[redacted]	Corral De Tierra Road C	1	SFU	9-12	[redacted]	[redacted]				
4/30/2007	[redacted]	Pine Canyon Rd.	1	SFU	9-12	[redacted]	[redacted]				
5/8/2007	[redacted]	Via Del Milagro	1	SFU	9-12	[redacted]	[redacted]				
5/21/2007	[redacted]	San Benancio Rd.	1	SFU	9-12	[redacted]	[redacted]				
6/1/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/1/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/1/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/1/2007	[redacted]	Fremont Drive	1	SFU	9-12	[redacted]	[redacted]				
6/1/2007	[redacted]	Fremont Drive	1	SFU	9-12	[redacted]	[redacted]				
6/7/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/7/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/7/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/7/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/7/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/7/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/7/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/7/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/7/2007	[redacted]	Fremont Dr.	1	SFU	9-12	[redacted]	[redacted]				
6/20/2007	[redacted]	Via Del Milagro	1	SFU	9-12	[redacted]	[redacted]				
6/27/2007	[redacted]	Belmont Circle	1	SFU	9-12	[redacted]	[redacted]				
6/29/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/29/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/29/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/29/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/29/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/29/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/29/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/29/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/29/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
6/29/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Nacional Ave.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Nacional Ave.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Nacional Ave.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Nacional Ave.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Second St.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Second St.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Second St.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Second St.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Second St.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Second St.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Second St.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Second St.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Second St.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Second St.	1	SFU	9-12	[redacted]	[redacted]				
7/3/2007	[redacted]	Second St.	1	SFU	9-12	[redacted]	[redacted]				
7/12/2007	[redacted]	Oso De Court	1	SFU	9-12	[redacted]	[redacted]				
7/19/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/19/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/19/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/20/2007	[redacted]	Jackson St.	1	SFU	9-12	[redacted]	[redacted]	2			1
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				

L-15

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/24/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
7/30/2007	[redacted]	Via Del Milagro	1	SFU	9-12	[redacted]	[redacted]				
8/20/2007	[redacted]	Big Sky Lane	1	SFU	9-12	[redacted]	[redacted]				
8/20/2007	[redacted]	Big Sky Lane	1	SFU	9-12	[redacted]	[redacted]				
8/20/2007	[redacted]	Big Sky Lane	1	SFU	9-12	[redacted]	[redacted]				
8/22/2007	[redacted]	Bolsa Loop	1	SFU	9-12	[redacted]	[redacted]				
9/19/2007	[redacted]	Calera Canyon	1	SFU	9-12	[redacted]	[redacted]				1
9/21/2007	[redacted]	Via Del Milagro	1	SFU	9-12	[redacted]	[redacted]				
9/24/2007	[redacted]	Big Sky Lane	1	SFU	9-12	[redacted]	[redacted]				
9/24/2007	[redacted]	Big Sky Lane	1	SFU	9-12	[redacted]	[redacted]				
9/24/2007	[redacted]	Rustic Lane	1	SFU	9-12	[redacted]	[redacted]				
9/25/2007	[redacted]	San Benancio Rd.	1	SFU	9-12	[redacted]	[redacted]				
11/15/2007	[redacted]	Pasadera Ct.	1	SFU	9-12	[redacted]	[redacted]				
11/16/2007	[redacted]	Perez St.	1	SFU	9-12	[redacted]	[redacted]				
11/27/2007	[redacted]	Pasadera Ct.	1	SFU	9-12	[redacted]	[redacted]				
12/13/2007	[redacted]	Pasadera Ct.	1	SFU	9-12	[redacted]	[redacted]				
12/21/2007	[redacted]	Ranchito Drive	1	SFU	9-12	[redacted]	[redacted]				
		Sub-Total 9-12 Service Area:	259	[redacted]				13	10	8	9

Combined Total 7-12 and 9-12 Service Areas:	1044	[redacted]		43	46	67	56	59	62

L-15

Multi-Family Housing Units and Student Matches

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
4/21/03	[redacted]	Fontes	7	MFU	7-12						
10/10/2003	[redacted]	Laurel Dr	4	MFU	7-12		1	2			1
1/5/2004	[redacted]	Constitution	17	MFU	7-12						
1/20/2004	[redacted]	Estrella Ave	12	MFU	7-12						
10/1/2004	[redacted]	Central	3	MFU	7-12		1				1
10/1/2004	[redacted]	Central	3	MFU	7-12		1	1			
12/14/2004	[redacted]	Canario St	4	MFU	7-12	1	2	2	3	1	2
4/19/2007	[redacted]	Front St.	85	MFU	7-12						
4/19/2007	[redacted]	Front St.	86	MFU	7-12						
5/2/2007	[redacted]	Front St. (81 apartments & comm.)	81	MFU	7-12						
11/29/2007	[redacted]	Castro St. Bldg. A	4	MFU	7-12						
11/29/2007	[redacted]	Castro St. Bldg. B	5	MFU	7-12						
		Sub-Total 7-12 Service Area:	311	[redacted]		1	5	5	3	1	4

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
4/16/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]	1			
4/16/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]		3		
4/16/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]				1
4/16/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]				
4/16/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]				
4/16/03	[redacted]	Independence	15	MFU	9-12	[redacted]	[redacted]				
5/15/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]			1	
5/15/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]	1		1	1
5/15/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]		1		
5/15/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]	1		2	2
5/15/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]				
5/15/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]				
5/15/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]				
5/15/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]	1			1
5/15/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]	2			
5/15/03	[redacted]	Independence	13	MFU	9-12	[redacted]	[redacted]				
5/15/03	[redacted]	Independence	10	MFU	9-12	[redacted]	[redacted]				
10/26/2007	[redacted]	Rogge Village Loop Lot D (APARTMENTS) (multiple permits)	48	MFU	9-12	[redacted]	[redacted]				
		Sub-Total 9-12 Service Area:	268	[redacted]				6	4	4	5

Combined Total 7-12 and 9-12 Service Areas:	579	[redacted]		1	5	11	7	5	9

L-15

**SALINAS UNION
HIGH SCHOOL DISTRICT**

**SCHOOL FACILITY
MASTER PLAN**

March 2008

School Facility Consultants

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

SALINAS UNION HIGH SCHOOL DISTRICT

SCHOOL FACILITY MASTER PLAN

March 2008

Prepared for

SALINAS UNION HIGH SCHOOL DISTRICT

Prepared by

SCHOOL FACILITY CONSULTANTS

1303 J Street, Suite 500
Sacramento, CA 95814
(916) 441-5063

L-15

TABLE OF CONTENTS

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

TABLES

L-15

CHARTS

APPENDIX

L-15

Executive Summary

The Salinas Union High School District School Facility Master Plan assesses the future facility needs of the District and provides options to meet the twenty-two year facility need. The Plan considers regional demographic data and development activities that may impact the student population. The Plan also identifies the existing facilities and examines various methods to house students. The District's twenty-two year facility needs are identified by examining enrollment projections in concert with the existing facilities. The Plan presents a Facility Plan, which meets the District's twenty-two year facility needs and identifies decision points for the District. The Plan also presents additional facility options that allow the District to remove/eliminate additional portable classrooms, relieving overcrowding at existing school sites. The Plan presents funding sources that may be used to accomplish the Facility Plan.

The Plan projects that the District's enrollment will grow up to 29 percent over the twenty-two year planning period (from 13,558 to 17,496). This level of growth shows that the District will not have sufficient permanent facilities to house the anticipated enrollment over the twenty-two year planning period. The District's use of portable classrooms, while housing student population growth, has had some negative impacts such as reducing the play field areas, locker rooms, gymnasiums, kitchens and administrative/counseling areas at the school sites. All schools are on sites that are smaller than those recommended by the California Department of Education (CDE) and therefore have student densities above the CDE recommendations.

The planning effort identified a series of goals of highest interest to the District and used these to develop and evaluate potential solutions for facility issues. The goals, as identified by district administrators, are:

- Eliminate portable classrooms that have become too old to maintain and reduce student densities on school sites which exceed the CDE recommendations,
- Free up classroom space that can be used for special programs,
- Take maximum advantage of State school facility funds.

At the request of the District, the Plan presents a Facility Plan for meeting the District needs over a twenty-two year period.

The consultant recommends the following Facility Plan:

- Construction of one new middle school with a capacity of 1,000 students;
- Construction of two new high schools (High School #1 with a capacity of 1,500 students and High School #2 with a capacity of 2,000 students).

Implementation of the Facility Plan will allow the District to remove some existing portable classrooms at all middle and high school campuses. However, certain sites will still have portable classrooms that have become too old to maintain and site densities well above those recommended by the CDE. As a result, the Plan provides the District with two additional facility options that would allow the District to eliminate additional portable classrooms that are too old to maintain and further reduce their site densities.

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

Salinas Union High School District – School Facility Master Plan – March 2008

These facility options are as follows:

- **Option #1**
  A second new middle school with a capacity of 1,000 students.
  A third new high school with a capacity of 2,000 students.

- **Option #2**
  Option #1 plus a fourth new high school with a capacity of 2,000 students.

The Plan includes an Implementation Plan that outlines a suggested schedule of activities to be conducted to implement the Facility Plan.

Final Environmental Impact Report
Monterey County 2007 General Plan

7-238

March 2010
ICF 00982.07

Introduction

A. Purpose

The purpose of this School Facility Master Plan (Plan) is to identify the facility needs of the Salinas High Union School District (District) over a twenty-two year planning period and examine strategies to meet those needs.

The Plan is designed to provide a "road map" to help the District meet its facility needs over the next twenty-two years. The Plan addresses the estimated number of classroom facilities that are needed, when they are needed, how much they will cost, and potential sources of funding to pay for needed facilities.

Factors that affect facility needs such as residential development rates and enrollment growth will change as economic and other conditions change in the District. As a result, the facility needs identified in this Plan should be reexamined and modified when appropriate.

B. Content/Organization

The Plan is organized according to the following four questions:

(1) Part One, What do we have?
(2) Part Two, What do we need?
(3) Part Three, What can we do to meet the need? and
(4) Part Four, How can we pay for it?

Part One analyzes the District's current facilities, including schools' pupil capacity, site size and use of portable classrooms. Part Two compares the District's projected enrollment growth with its current pupil capacities to quantify the additional pupil capacity required by the District. Part Three outlines alternative facility plans to meet the needs identified in Part Two. Part Four estimates the costs of the alternatives and identifies the District's potential sources of funding.

C. Acknowledgments

The following individuals and agencies assisted the consultants in preparing the School Facility Master Plan.

James Earhart, Associate Superintendent, CBO, Salinas Union High School District (SUHSD)
Karen Luna, Manager, Planning and Facilities, Salinas Union High School District (SUHSD)
Shelley Lapkoff, Lapkoff & Gobalet Demographic Research, Inc.
Jeanne Gobalet, Lapkoff & Gobalet Demographic Research, Inc.
City of Salinas Community Planning and Development Department
City of Salinas Redevelopment Department
Housing Authority of the County of Monterey
Monterey County Planning Department

Part One – What do we have?

Summary of Key Points:

- The District's operates four middle schools, four high schools and one continuation high school.
- The District has a 7-8 permanent pupil capacity of 3,979 seats. Permanent classroom capacity utilization for 2007 is 100% percent (7-8 enrollment of 3,997). The District also has a 7-8 portable classroom capacity of 1,193 seats. Capacity utilization, including portable classrooms, is 77%.
- The District has a 9-12 permanent pupil capacity of 6,377 seats. Permanent classroom capacity utilization for 2007 is 150% percent (9-12 enrollment of 9,561). The District also has a 9-12 portable classroom capacity of 3,213 seats. Capacity utilization, including portable classrooms, is 100%.
- All middle school sites are operating at site densities above the CDE recommendations. These sites will benefit from the removal of portables. However, even if all portables are removed from these sites, they will still operate at student densities above the CDE recommendations.
- If portable classrooms are removed at Alvarez High, the site would operate at a student density below the CDE recommendation. Site densities at all other high school sites will also benefit from the removal of portable classrooms. However, even if all portable classrooms are removed from these sites, they will still operate at student densities above the CDE recommendations.
- Several school sites have portable classrooms that are 20 years of age or older and are overly expensive to maintain. These sites will benefit from the removal of these portables and should be a priority of the District. The removal of these portable classrooms will also benefit the District by reducing site densities at existing campuses.

Part One is divided into two sections. The first section analyzes the District's school sites' pupil capacity and current capacity utilization. The second section analyzes the use of portable classrooms and student densities on each school site.

A. Pupil Capacity/Facility Utilization

The capacity of a school site is determined by (1) counting the number of classrooms on the site, (2) multiplying each by the appropriate loading standard (the maximum number of students placed in a room), and (3) making adjustments to account for policies that affect capacity.

Tables 1 and 2 shows the pupil capacities and current utilization of each school site, both including and excluding existing portable classrooms. The classroom inventories, loading standards, and District policies that affect capacity are documented in the following subsections.

Because the site capacities in this Plan are being used for comparative planning purposes, they include adjustments for factors that affect a site's actual capacity (e.g., room usage policies, etc). Therefore, the school site capacities listed in the following tables might conflict with current daily usage and previously recorded capacity figures.

Table 1
2007 Pupil Capacity/Utilization of Middle Schools

Site	Grades	Pupil Capacity		2007/08 CBEDS Enrollment	Current Capacity Utilization	
		W/Ports	W/O Ports*		W/Ports	W/O Ports*
El Sausal MS	7-8	1,269	999	893	70%	89%
Harden MS	7-8	1,371	950	1,166	83%	123%
La Paz MS	7-8	1,242	999	979	79%	98%
Washington MS	7-8	1,290	1,031	959	74%	93%
Total		5,172	3,979	3,997	77%	100%

Table 2
2007 Pupil Capacity/Utilization of High Schools

Site	Grades	Pupil Capacity		2007/08 CBEDS Enrollment	Current Capacity Utilization	
		W/Ports	W/O Ports		W/Ports	W/O Ports
Alisal HS	9-12	2,322	1,593	2,464	106%	155%
Alvarez HS	9-12	2,403	1,296	2,241	93%	173%
North Salinas HS	9-12	2,084	1,652	1,997	96%	121%
Salinas HS	9-12	2,484	1,620	2,549	103%	157%
Mount Toro HS	9-12	297	216	310	104%	144%
Total		9,590	6,377	9,561	100%	150%

1. Classroom Inventories

Tables 3 and 4 list the classroom inventories of each site. The inventories are based on current site utilization diagrams provided by the District and site administrators and conversations with District administrators regarding the use of classrooms for the 2007school year.

Table 3
Classroom Inventory, Middle School Sites

Site	Standard Classroom	Pull Out	Special Day	Non-District Owned/Operated	Total
El Sausal Middle School	47	3	0	1	51
Harden Middle School	49	1	3	0	53
La Paz Middle School	46	3	0	0	49
Washington Middle School	46	2	3	0	51
Total	188	9	6	1	204*

*Includes 49 portable classrooms.

Table 4
Classroom Inventory, High School Sites

Site	Standard Classroom	Lab	ROP / ROTC	Band / Music	Drama / Theater	Special Day	Pull Out	Non-District	Total
Alisal High	70	13	1	1	1	0	4	2	92
Alvarez High	72	15	1	1	0	0	10	1	100
North Salinas High	55	19	0	1	1	2	5	3	86
Salinas High	71	17	0	3	1	0	4	0	96
Mount Toro High	5	6	0	0	0	0	1	0	12
Total	273	70	2	6	3	2	24	6	386*

*Includes 140 portable classrooms.

2. Loading Standards

Table 5 lists the loading standards for 7-12 classrooms provided by the District and site administrators.

Table 5
Loading Standards

Grade Group (7-12)	Loading Standard
Standard Classroom (7-12)	27
Lab (9-12)	27
ROP / ROTC (9-12)	27
Band / Music / Choral (9-12)	27
Drama / Theater (9-12)	27
Special Day (7-12)	16
Physical Education (7-12)	100
Pull Out (7-12)	0
Non-District (7-12)	0

3. District Policies that Affect Capacity

The District currently operates pull-out type programs at all grade levels (i.e., students leave their regular classroom and occupy space in another classroom during the pull-out program). Examples of pull-out type programs that are in use are Detention Centers, Career Centers, Instructional Service Rooms and Leadership Rooms. The rooms used for these programs are not counted in calculating site capacities because they do not contribute to the effective capacity of the school.

B. Analysis of Portable Classroom Use, Age and School Site Student Densities

Two important issues that are relevant when evaluating the current capacity of a school district are student densities at school sites and the age of portable classrooms that have become too old to maintain. For example, a school site that has a large portion of its capacity in portable classrooms

might have undesirably high student densities and maybe occupying portable classrooms that do not meet District standards and are overly expensive to preserve.

1. Inventory of Portable Classrooms by School Site

Table 6 identifies the use and age of portable classrooms on the District's school sites, in descending order of total portable classrooms on each site.

Table 6
Portable Classroom Use

Site	Total Number of Portables	Number of Portables Over 20 Years Old	Total Number of Permanent Classrooms	Total Number of Classrooms	Percent of Total Classrooms that are Portables
Alvarez High	49	0	51	100	49%
Salinas High	32	0	64	96	33%
Alisal High	30	12	62	92	33%
North Salinas High	23	5	63	86	27%
Harden Middle	17	12	36	53	32%
El Sausal Middle	13	9	38	51	25%
Washington Middle	10	0	41	51	20%
La Paz Middle	9	0	40	49	18%
Mount Toro High	4	1	8	12	33%
Totals	187	39%	403	590	32%

2. School Site Student Densities

A good measure of appropriate student density for a school site is to compare its site size with the site size recommended by the California Department of Education (CDE) for a school with equivalent enrollment. For example, the capacity of El Sausal Middle School is 1,269 students. The CDE recommends that a middle school of that capacity be on a site of 23.1 useable acres. Because El Sausal Middle School is on an 18 acre site, we can infer that it has a student density above the CDE recommended density. Conversely, schools with site sizes larger than the CDE recommended size have student densities below the CDE recommended levels.

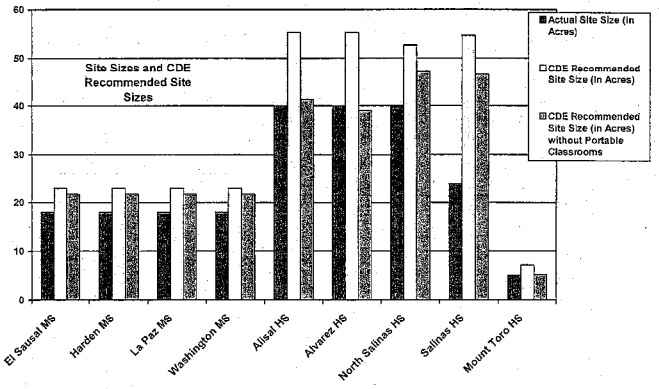
Table 7 again lists the school sites in descending order of total portable classrooms. The table shows, for each school site, (1) its site size in acres, (2) the site size recommended by the CDE, given its planned grade configuration capacity as described in Part III of the Plan, and (3) the site size recommended by the CDE if all portable classrooms at the site were removed. Chart A shows the same information in bar graph form.

(continued on the next page)

Table 7
School Site Size and CDE Recommended Site Size

Site	Site Size (in Useable Acres)	CDE Recommended Site Size (in Useable Acres)	CDE Recommended Site Size (in Useable Acres) without Portable Classrooms
El Sausal MS	18	23.1	21.9
Harden MS	18	23.1	21.9
La Paz MS	18	23.1	21.9
Washington MS	18	23.1	21.9
Alisal HS	40	55.3	41.3
Alvarez HS	40	55.3	39
North Salinas HS	40	52.7	47.1
Salinas HS	24	54.7	46.5
Mount Toro HS	5	7.2	5.2

Chart A
School Site Size and CDE Recommended Site Size



As Table 7 shows, all District schools are on school sites that are smaller than those recommended by the CDE and therefore, have student densities above the CDE recommendations. In addition, Table 7 shows that removing portable classrooms from Alvarez High would allow the site to be larger than the site size recommended by the CDE and therefore, have a student density below the

CDE recommendation. Site densities at all other school sites will also benefit from the removal of portable classrooms. However, even if all portable classrooms are removed from these sites, they will still be on sites smaller than the site sizes recommended by the CDE. Alternatives for removing portable classrooms from campuses are discussed in Part Three of this Report. Table 8 identifies the minimum number of portable classrooms that would need to be removed in order to accomplish a site density consistent with the CDE recommendations.

Table 8
Portable Classroom Removal and CDE Recommended Site Size

Site	Site Size (in Acres)	Total Number of Portable Classrooms	Number of Standard Classroom Portables Removed (Minimum)	Resultant CDE Recommended Site Size (in Acres)
El Sausal MS	18	10	10*	21.9
Harden MS	18	16	16*	21.9
La Paz MS	18	9	9*	21.9
Washington MS	18	10	10*	21.9
Alisal HS	40	27	27*	41.3
Alvarez HS	40	41	38	39
North Salinas HS	40	16	16*	44.5
Salinas HS	24	32	32*	44.5
Mount Toro HS	5	3	3*	5.2
Totals	N/A	164	163	N/A

*The CDE recommended site size is still larger than the actual site size even when all portable classrooms are removed.

3. Removal of Portable Classrooms that have become too old to Maintain.

When removing portable classrooms the District should prioritize removal of classrooms that are greater than 20 years of age (See Table 6). The 20 year benchmark is an appropriate measure of age as it is the point in time that the State provides funding for major renovation and or replacement of portable classrooms.

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

Salinas Union High School District – School Facility Master Plan – March 2008

Part Two – What do we need?

Summary of Key Points:

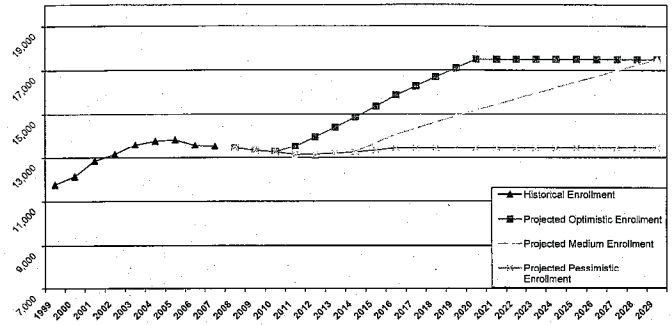
- The District's enrollment is projected to increase up to 29 percent over the twenty-two year period (from 13,558 to 17,496). Three enrollment forecasts are presented in the Plan, representing three different timing scenarios related to planned residential development in the District.
- Based on current classroom facilities and facility-use policies, the District requires additional capacity at the middle school grade level of up to 12 spaces (approximately 1 classroom) over the twenty-two year planning period should the District continue to use all portable classrooms at existing campuses. However, the District has 21 portable classrooms at middle school sites that are aging and will need to be removed, which will require the District to add up to 567 additional spaces, for a total of approximately 22 classrooms of additional capacity at the middle school grade level over the twenty-two year planning period. Additionally, as outlined in Part One, all District middle school sites are operating at densities well above those recommended by the CDE. Based on the District's permanent classroom facilities and facility-use policies, the District will require up to 1,205 spaces (approximately 45 classrooms) of additional capacity at the middle school grade level over the twenty-two year planning period.
- Based on current facilities and facility-use policies, the District will require up to 2,722 spaces (approximately 101 classrooms) of additional capacity at the high school grade level over the twenty-two year planning period. The District's high school site densities will also benefit from the removal of portable classrooms. Of the 138 portables on high school campuses, 18 portables are 20 years of age or older and should be the District's priority for removal. Based on the District's permanent classroom facilities and facility-use policies, the District will require up to 5,935 spaces (approximately 220 classrooms) of additional capacity at the high school grade level over the twenty-two year planning period.

Part Two is divided into two sections. The first section projects the District's enrollment over the next twenty-two years. The second section compares projected enrollment to current facility capacity and identifies the additional pupil capacity required over the next twenty-two years.

A. Enrollment History and Projection

The enrollment history and projection information used in the Plan was prepared by Lapkoff & Gobalet Demographic Research, Inc. (Demographers) and is included as an Appendix. The Demographers presented three different forecasts identified as "Optimistic", "Medium" and "Pessimistic". The three forecasts represent three different timing scenarios related to the planned residential development in West Boronda and the Future Growth Areas (FGAs) north and east of the City of Salinas. The "Optimistic" forecast assumes development completion by 2020, the "Medium" forecast assumes development completion by 2029 and the "Pessimistic" forecast assumes that no residential development will be completed by 2029. Chart B shows the District's projected 7-12 enrollment, and Charts C and D show the projected enrollment growth of the middle and high school grade groups.

Chart B
Historical and Projected 7-12 Enrollment, 2007 – 2029



(continued on the next page)

Table 9
Projected Optimistic Middle School Enrollment, 2007 – 2029

Year	Optimistic Enrollment Projections	Annual Percent Change	Increase (or Decrease) in Students
2007*	3,997	N/A	N/A
2008	3,995	(0.05%)	(2)
2009	3,965	(0.8%)	(30)
2010	3,956	(0.23%)	(9)
2011	4,014	1.47%	58
2012	4,164	3.74%	150
2013	4,382	5.24%	218
2014	4,542	3.65%	160
2015	4,667	2.75%	125
2016	4,770	2.21%	103
2017	4,874	2.18%	104
2018	4,977	2.11%	103
2019	5,080	2.07%	103
2020	5,184	2.05%	104
2021	5,184	0%	0
2022	5,184	0%	0
2023	5,184	0%	0
2024	5,184	0%	0
2025	5,184	0%	0
2026	5,184	0%	0
2027	5,184	0%	0
2028	5,184	0%	0
2029	5,184	0%	0

*Based on current CBEDS provided by District.

(continued on the next page)

Table 10
Projected Medium Middle School Enrollment, 2007– 2029

Year	Medium Enrollment Projections	Annual Percent Change	Increase (or Decrease) in Students
2007*	3,997	N/A	N/A
2008	3,995	(0.05%)	(2)
2009	3,965	(0.8%)	(30)
2010	3,956	(0.23%)	(9)
2011	3,911	(1.14%)	(45)
2012	3,958	1.2%	47
2013	4,072	2.88%	114
2014	4,128	1.38%	56
2015	4,252	3%	124
2016	4,323	1.68%	71
2017	4,395	1.67%	72
2018	4,466	1.62%	71
2019	4,537	1.59%	71
2020	4,609	1.59%	72
2021	4,673	1.39%	64
2022	4,736	1.35%	63
2023	4,800	1.35%	64
2024	4,864	1.33%	64
2025	4,928	1.32%	64
2026	4,992	1.3%	64
2027	5,056	1.28%	64
2028	5,120	1.27%	64
2029	5,184	1.25%	64

*Based on current CBEDS provided by District.

(continued on the next page)

Table 11
Projected Pessimistic Middle School Enrollment, 2007 – 2029

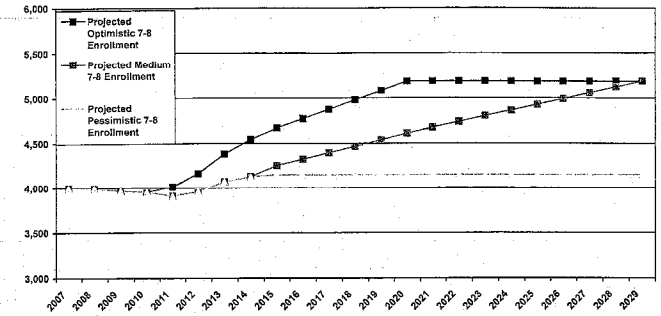
Year	Pessimistic Enrollment Projections	Annual Percent Change	Increase (or Decrease) in Students
2007*	3,997	N/A	N/A
2008	3,995	(0.05%)	(2)
2009	3,965	(0.8%)	(30)
2010	3,956	(0.23%)	(9)
2011	3,911	(1.14%)	(45)
2012	3,958	1.2%	47
2013	4,072	2.88%	114
2014	4,128	1.38%	56
2015	4,150	0.53%	22
2016	4,150	0%	0
2017	4,150	0%	0
2018	4,150	0%	0
2019	4,150	0%	0
2020	4,150	0%	0
2021	4,150	0%	0
2022	4,150	0%	0
2023	4,150	0%	0
2024	4,150	0%	0
2025	4,150	0%	0
2026	4,150	0%	0
2027	4,150	0%	0
2028	4,150	0%	0
2029	4,150	0%	0

*Based on current CBEDS provided by District.

(continued on the next page)

L-15

Chart C
Projected Middle School Enrollment, 2007 – 2029



(continued on the next page)

L-15

Table 12
Projected Optimistic High School Enrollment, 2007 – 2029

Year	Projected Optimistic Enrollment	Annual Percent Change	Increase (or Decrease) in Students
2007*	9,561	N/A	N/A
2008	9,458	(1.08%)	(103)
2009	9,364	(0.99%)	(94)
2010	9,302	(0.66%)	(62)
2011	9,519	2.33%	217
2012	9,791	2.86%	272
2013	10,027	2.41%	236
2014	10,333	3.05%	306
2015	10,700	3.55%	367
2016	11,102	3.76%	402
2017	11,404	2.72%	302
2018	11,707	2.67%	303
2019	12,009	2.58%	302
2020	12,312	2.52%	303
2021	12,312	0%	0
2022	12,312	0%	0
2023	12,312	0%	0
2024	12,312	0%	0
2025	12,312	0%	0
2026	12,312	0%	0
2027	12,312	0%	0
2028	12,312	0%	0
2029	12,312	0%	0

*Based on current CBEDS enrollment provided by District.

(continued on the next page)

Table 13
Projected Medium High School Enrollment, 2007 – 2029

Year	Projected Medium Enrollment	Annual Percent Change	Increase (or Decrease) in Students
2007*	9,561	N/A	N/A
2008	9,458	(1.08%)	(103)
2009	9,364	(0.99%)	(94)
2010	9,302	(0.66%)	(62)
2011	9,216	(0.92%)	(86)
2012	9,186	(0.33%)	(30)
2013	9,119	(0.73%)	(67)
2014	9,123	0.04%	4
2015	9,454	3.63%	331
2016	9,760	3.24%	306
2017	9,967	2.12%	207
2018	10,173	2.07%	206
2019	10,380	2.03%	207
2020	10,587	2%	207
2021	10,778	1.8%	191
2022	10,970	1.78%	192
2023	11,162	1.75%	192
2024	11,353	1.71%	191
2025	11,545	1.69%	192
2026	11,737	1.66%	192
2027	11,928	1.63%	191
2028	12,120	1.61%	192
2029	12,312	1.58%	192

*Based on current CBEDS enrollment provided by District.

(continued on the next page)

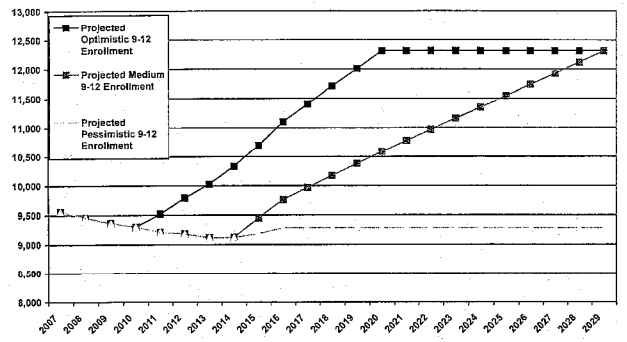
Table 14
Projected Pessimistic High School Enrollment, 2007 – 2029

Year	Projected Pessimistic Enrollment	Annual Percent Change	Increase (or Decrease) in Students
2007*	9,561	N/A	N/A
2008	9,458	(1.08%)	(103)
2009	9,364	(0.99%)	(94)
2010	9,302	(0.66%)	(62)
2011	9,216	(0.92%)	(86)
2012	9,186	(0.33%)	(30)
2013	9,119	(0.73%)	(67)
2014	9,123	0.04%	4
2015	9,187	0.7%	64
2016	9,287	1.09%	100
2017	9,287	0%	0
2018	9,287	0%	0
2019	9,287	0%	0
2020	9,287	0%	0
2021	9,287	0%	0
2022	9,287	0%	0
2023	9,287	0%	0
2024	9,287	0%	0
2025	9,287	0%	0
2026	9,287	0%	0
2027	9,287	0%	0
2028	9,287	0%	0
2029	9,287	0%	0

*Based on current CBEDS enrollment provided by District.

(continued on the next page)

Chart D
Projected High School Enrollment, 2007– 2029



B. Required New Capacity

The additional pupil capacity required by the District over the next twenty-two years is calculated by comparing the projected enrollment against the pupil capacities outlined in Part One.

The enrollment projection relies largely on projections of future residential development. If actual development rates are greater or lesser than the Plan's projection, then the District will have a greater or lesser need for additional school facilities, respectively. In addition, if other factors in the District such as, student generation rates of residential units, residential vacancy rates, private school attendance, etc., deviate from historical patterns, the enrollment projection in this Plan will need to be modified.

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

Salinas Union High School District – School Facility Master Plan – March 2008

The capacity figures are based on the loading standards and District policies outlined in Part One. If the District modifies its use of facilities (e.g., reduces/increases the number of portable classrooms on some sites), the District will have a greater or lesser need for additional school facilities. Some possible facility policy changes that will affect the required amount of additional capacity are identified along with the Facility Plan outlined in Part Three.

Table 15
Required (or Excess) Capacity, in Numbers of 7-8 Students/Classrooms
(Based on all classrooms within District)

		5 Year		10 Year		15 Year		22 Year	
Grade Level	Forecast	Students	CRs	Students	CRs	Students	CRs	Students	CRs
7-8	Optimistic	(1,008)	0	(298)	0	12	1	12	1
7-8	Medium	(1,214)	0	(777)	0	(436)	0	12	1
7-8	Pessimistic	(1,214)	0	(1,022)	0	(1,022)	0	(1,022)	0

Table 16
Required (or Excess) Permanent Capacity, in Numbers of 7-8 Students/Classrooms
(Based on all permanent classrooms within District)

		5 Year		10 Year		15 Year		22 Year	
Grade Level	Forecast	Students	CRs	Students	CRs	Students	CRs	Students	CRs
7-8	Optimistic	185	7	895	34	1,205	45	1,205	45
7-8	Medium	(21)	0	416	16	757	29	1,205	45
7-8	Pessimistic	(21)	0	171	7	171	7	171	7

Table 17
Required (or Excess) Capacity, in Numbers of 9-12 Students/Classrooms
(Based on all classrooms within District)

		5 Year		10 Year		15 Year		22 Year	
Grade Level	Forecast	Students	CRs	Students	CRs	Students	CRs	Students	CRs
9-12	Optimistic	201	8	1,814	68	2,722	101	2,722	101
9-12	Medium	(404)	0	377	14	1,380	52	2,722	101
9-12	Pessimistic	(404)	0	(303)	0	(303)	0	(303)	0

Table 18
Required (or Excess) Permanent Capacity, in Numbers of 9-12 Students/Classrooms
(Based on all permanent classrooms within District)

		5 Year		10 Year		15 Year		22 Year	
Grade Level	Forecast	Students	CRs	Students	CRs	Students	CRs	Students	CRs
9-12	Optimistic	3,414	127	5,027	187	5,935	220	5,935	220
9-12	Medium	2,809	105	3,590	133	4,593	171	5,935	220
9-12	Pessimistic	2,809	105	2,910	108	2,910	108	2,910	108

Final Environmental Impact Report
Monterey County 2007 General Plan

March 2010
ICF 00982.07

L-15

Salinas Union High School District – School Facility Master Plan – March 2008

At the middle school level, based on the District's total classroom facilities and facility–use policies, the District requires additional capacity at the middle school grade level of up to 12 spaces (approximately 1 classroom) over the twenty-two year planning period should the District continue to use all portable classrooms at existing campuses. However, the District has 21 portable classrooms at middle school sites that are aging and will need to be removed, which will require the District to add up to 567 additional spaces, for a total of approximately 22 classrooms of additional capacity at the middle school grade level over the twenty-two year planning period. Based on the District's permanent classroom facilities and facility-use policies, the District will require up to 1,205 spaces (approximately 45 classrooms) of additional capacity at the middle school grade level over the twenty-two year planning period.

At the high school level, based on the District's total classroom facilities and facility–use policies, the District will require up to 2,722 spaces (approximately 101 classrooms) over the twenty-two year planning period. Of the 138 portables on high school campuses, 18 portables are 20 years of age or older and should be the District's priority for removal. Based on the District's permanent classroom facilities and facility–use polices, the District will require up to 5,935 spaces (approximately 220 classrooms) over the twenty-two year planning period.

Alternative plans to provide facilities for these students are outlined in Part Three.

19

L-15

Salinas Union High School District – School Facility Master Plan – March 2008

Part Three – What can we do to meet the need?

Summary of Key Points:

- The District's Facility Plan for the next twenty-two years includes a new middle school and two new high schools. This plan will allow the District to house all students over a twenty-two year planning period and begin to eliminate portable classrooms that are too old to maintain and create site densities that are in excess of those recommended by the CDE. The District can eliminate up to 36 portable classrooms (including 21 portable classrooms that are too old to maintain) at middle school and up to 28 portable classrooms (including 18 portable classrooms that are too old to maintain) at high school, which will greatly reduce middle and high school site densities.
- Two additional options are also discussed that would allow the District to further reduce site densities. Under Option #1 the District would construct a second new middle and third new high school. At the middle school level, the District would be able to remove up to 9 additional portable classrooms, providing the District with 773 additional seats of capacity. At the high school level, the District would be able to remove up to 74 additional portable classrooms, providing the District with 24 additional seats of capacity.
- Under Option #2 the District would construct a fourth new high school, which would allow the District to remove up to 11 additional portable classrooms, providing the District with 1,727 additional seats of capacity.

This section presents a Facility Plan, the goal of which is to house all students over a twenty-two year planning period. The Facility Plan provides all the required new capacity at the middle and high school levels.

When possible, the Facility Plan outlines strategies for eliminating portable classrooms that are too old to maintain and portable classrooms that create site densities that are in excess of those recommended by the CDE (see Tables 6, 7 and 8 and Chart A in Part One of the Plan). Implementation of the Facility Plan will allow the District to remove some portable classrooms at existing campuses.

As outlined in Part Two of the Plan, the Demographer has outlined three potential enrollment growth scenarios (optimistic, medium and pessimistic) which differ based on the varied timing of development. The Facility Plan outlined in this section assumes the "optimistic" forecast as the District needs to plan for peak projected enrollment. If enrollment growth should occur at a different pace than the "optimistic" forecast suggests, the District can adjust its Facility Plan accordingly.

In addition to providing the capacity required to house future enrollment, the District has identified three other goals for a Facility Plan. They are:

- Eliminate portable classrooms that have become too old to maintain and reduce student densities on school sites which exceed the CDE recommendations,

20

- Free up classroom space that can be used for special programs,
- Take maximum advantage of State school facility funds.

A. Facility Plan

The elements of the Facility Plan designed with the above goals in mind are:

- A new middle school with a capacity of 1,000 students,
- A new high school with a capacity of 1,500 students and a second high school with the capacity of 2,000 students.

This facility plan provides sufficient capacity to house all projected middle and high school students and takes steps towards eliminating/converting portable classrooms.

Table 19 shows how the District's Facility Plan might be implemented over the twenty-two year period.

Table 19
Implementation of the Facility Plan

Year	Projected Middle School Facility Need	Projected High School Facility Need	Actions	New Middle School	New High School Seats	Resulting Middle School Facility Need	Resulting High School Facility Need
2012	(1,008)	201	No facilities needed at middle school. Open the District's new High School (1,500 seats) and remove up to 14 portables from existing high school sites, all of which are too old to maintain.	0	1,500	(1,008)	(921)
2013	(790)	(685)	No facilities needed at high school. Open the District's new middle school (1,000 seats) and remove up to 36 portables from existing middle school sites, 21 of which are too old to maintain.	1,000	0	(818)	(685)
2016	(430)	390	No facilities needed at middle school. Open additional high school (2,000 seats) and remove up to 14 portables from existing high school sites, 4 of which are too old to maintain.	0	2,000	(430)	(1,232)
2029	(16)	(22)	No facilities need.	0	0	(16)	(22)

As shown in the Table 19, the Facility Plan will house all students projected over the twenty-two year planning period.

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

Salinas Union High School District – School Facility Master Plan – March 2008

At the middle school grade levels, if the District constructs a new middle school with a capacity of 1,000 students, it can eliminate up to 36 portables at existing middle school sites, greatly reducing middle school site densities. Of the 36 portables that can be removed from middle school campuses, 21 portables are too old to maintain and should be the District's priority for removal.

At the high school grade levels, if the District constructs two new high schools (High School #1 with a capacity of 1,500 students and High School #2 with a capacity of 2,000 students) it can eliminate up to 28 portables at existing high school sites, greatly reducing high school site densities. Of the 28 portables that can be removed from high school campuses, 18 portables are too old to maintain and should be the District's priority for removal.

B. Additional Facility Options

Although the Facility Plan outlined above houses all students anticipated over the twenty-two year planning period, additional new school facilities are needed to allow the District to eliminate/convert additional portable classrooms at existing school sites that have densities above those recommended by the CDE. The following options would allow the District to eliminate/convert additional portable classrooms at existing school sites.

- **Option #1**
  A second new middle school with a capacity of 1,000 students.
  A third new high school with a capacity of 2,000 students.

This option would allow the District to remove an additional 9 portable classrooms at middle school sites and an additional 74 portable classrooms at high school sites. This option would also provide the District with an additional 773 seats of middle school capacity and 24 seats of high school capacity beyond the twenty-two year facility need.

- **Option #2**
  Option #1 plus a fourth new high school with a capacity of 2,000 students.

This option would allow the District to remove an additional 11 portable classrooms at high school sites and would provide the District with an additional 1,727 seats of high school capacity beyond the twenty-two year facility need.

Part Four – How do we pay for it?

Summary of Key Points

- The estimated cost of the District's Facility Plan for required new capacity is $193.8 million.
- The estimated cost of additional facilities needed to reduce District site densities to align with site densities recommended by the CDE (Option #1 and Option #2) is $229.3 million.
- The total estimated cost of the District's Facility Plan and Option #1 and Option #2 is $423.2 million.
- The primary sources of funds for the District's facility needs are anticipated to be (1) the State School Facility Program, (2) Developer Fees and (3) existing General Obligation Bond funds.
- Projected funding from the State School Facility Program, Developer Fees and existing General Obligation Bond funds are estimated at $119.5 million for the District's Facility Plan and $110.2 million for the Option #1 and Option #2, for a total of $229.8 million.
- The District's projected funding falls short of the District's facility revenue needs. The District requires approximately $74.3 million in additional funding for the District's Facility Plan and $119.1 million of additional funding for Option #1 and Option #2, for a total of $193.4 million in additional funding need. The District will need to investigate additional revenue sources such as future general obligation bonds, Mello-Roos financing, etc. to fund the District anticipated facility needs.

Part Four is divided into two sections. The first section estimates the cost to provide the school facilities presented in Part Three. The second section projects the funds available to the District for facility projects. Both funding and cost estimates are calculated in current dollars assuming that cost and funding inflation will occur at a similar rate.

A. Cost Estimates

1. Facility Plan

The information in Table 20 shows that the estimated cost of the District's Facility Plan outlined in Part Three is $193,850,000. Cost estimates are based on District estimates to construct new middle and high school facilities.

(continued on the next page)

Table 20
Cost Estimate of District's Facility Plan

Facility Plan:		
Site	Project Description	Cost*
New Middle School #1	New middle school with a capacity of 1,000 students.	$30,350,000
New High School #1**	New high school with a capacity of 1,500 students.	$64,000,000
New High School #2	New high school with a capacity of 2,000 students.	$99,500,000
Sub-Total		$193,850,000
Option #1:		
New Middle School #2	New middle school with a capacity of 1,000 students.	$30,350,000
New High School #3	New high school with a capacity of 2,000 students.	$99,500,000
Sub-Total		$129,850,000
Option #2:		
New High School #4	New high school with a capacity of 2,000 students.	$99,500,000
Sub-Total		$99,500,000
Total		$423,200,000

*School facility costs are based on estimates provided by the District. Actual cost will vary based on timing of construction.
**The District owns the site for New High School #1.

2. Total Costs of Option #1 and Option #2

As the above cost estimates show, the costs of providing the additional pupil capacity outlined in Option #1 and Option #2 discussed in Part Three of the Plan are $129,850,000 and $99,500,000, respectively.

B. Funding Sources

1. School Facility Program

The State School Facility Program (SFP) is a likely funding source for the District's projects. This section estimates the SFP funding that will be available to the District. The estimates assume that the District has new construction eligibility and that the State will have new construction funds in the years that the District will likely apply for State funding.

The SFP calculates enrollment projections and facility capacities based on formulas in State law. The amount of SFP funding available to districts is then determined by (1) subtracting projected enrollment from capacity to determine the number of unhoused students in a district and (2) multiplying unhoused students by per pupil grant amounts. The formulas used in the SFP to determine enrollment projections and facility capacities are not appropriate to determine true local need for school facilities. The enrollment and capacity figures used in determining amounts of SFP funding should not be used for long term planning purposes.

The SFP is governed by the State Allocation Board (SAB), which will continue to make changes to the program. Eligibility for funding should be re-examined on an annual basis, or when the program changes. Funding under the SFP is available when the District has Division of the State Architect (DSA) approved construction plans.

The amounts in Table 21 and Table 22 are estimates of the amount of funding available to the District in the years that it will apply for State funding based on the Implementation Plan and Option #1 and Option #2 outlined in Part Three. The amounts assume that the District will have new construction eligibility in the years that it will likely apply for State funding, based on the Implementation Plan outlined in Part Three.

Table 21
Facility Plan
School Facility Program Estimated New Construction Funding

Grade Group	2012/13	2013/14	2016/17	Total
7-8	$0	$15,273,668	$0	$15,273,668
9-12	$28,977,300	$0	$38,636,400	$67,613,700
Total	$28,977,300	$15,273,668	$38,636,400	$82,887,368

Table 22
Option #1 and Option #2
School Facility Program Estimated New Construction Funding

Grade Group	2020/21	2023/24	2029/30	Total
7-8	$15,273,668	$0	$0	$15,273,668
9-12	$0	$38,636,400	$38,636,400	$77,272,800
Total	$15,273,668	$38,636,400	$38,636,400	$92,546,468

The potential SFP new construction funding outlined in Table 21 and Table 22 includes 50% of new construction costs as defined by the SFP because the SFP is a match program. The table also includes estimated costs for site development and site acquisition costs relevant to the District's new construction projects. The District will be limited to project capacity when accessing State funds (i.e., maximum grant funding on a middle school with 1,000 seats is 1,000 grants)

2. Developer Fees

The District currently collects developer fees on commercial/industrial development and residential development. The District should continue to collect the maximum fee allowed by law and should re-examine development trends on an annual basis.

Projected revenue from developer fees over the twenty-two year planning period is estimated based on (1) current developer fee fund balances and (2) developer fee revenue projections based on the District's current and historical collection rates and anticipated residential development as outlined in the Demographer's "optimistic" forecast. The amounts in Table 23 and Table 24 are estimates of

the amount of developer fee funding available to the District in the years that it will apply for State funding based on the Implementation Plan and Option #1 and Option #2 outlined in Part Three. The District anticipates using this revenue on the District's projects outlined in this Plan. The District may also use some of this revenue towards other projects not related to the growth needs outlined in this Plan. The ability of the District to access revenue from developer fees depends on development trends in the District. Should development trends deviate from the development assumptions in the District's "optimistic" forecast, the developer fee revenue estimated in this Plan will need to be modified.

Table 23
Facility Plan
Estimated Developer Fee Revenue

Grade Group	2012/13	2013/14	2016/17	Total
7-12	$9,688,291	$4,169,145	$12,507,436	$26,364,872

Table 24
Option #1 and Option #2
Estimated Developer Fee Revenue

Grade Group	2020/21	2023/24	2029/30	Total
7-12	$16,676,581	$344,504	$689,008	$17,710,093

3. General Obligation Bonds

School districts can, with the approval of either two-thirds or 55 percent of its voters, issue general obligation bonds that are paid for out of property taxes. The District gained voter approval for a Proposition 39 General Obligation Bond in March 2002, and another General Obligation Bond in November 2002. The District has $10,346,000 available from General Obligation Bond funds to use towards future middle schools. The District may explore a future ballot measure to provide funding to allow the District to construct needed new school facilities and provide funding for other District facility needs.

4. Parcel Taxes

Approval by two-thirds of the voters is required to impose taxes that are not based on the assessed value of individual parcels. While these taxes have been occasionally used in school districts, the revenues are typically minor and are used to supplement operating budgets. The District does not currently collect parcel tax revenue, however, could investigate a parcel tax as a revenue source to allow the District to construct needed new school facilities and provide funding for other District facility needs.

5. Mello-Roos Community Facilities Districts

This alternative uses a tax on property owners within a defined area to pay long-term bonds issued for specific public improvements. Mello-Roos taxes require approval from two-thirds of the voters

(or land owners if fewer than 12) in an election. The District currently does not have any Mello-Roos authorizations, however, could investigate a parcel tax as a revenue source to allow the District to construct needed new school facilities and provide funding for other District facility needs.

6. Other Agency Joint Participation

Other agencies that have similar needs may be willing to share the cost of providing new or modernized facilities in exchange for joint-use. The District may be able to enter into joint-use with the City of Salinas or the County of Monterey for parks and recreational facilities.

7. Asset Management

The District has not identified any unused assets that might be used to generate revenue for facility funding.

8. Debt Financing

The District has utilized Municipal Leases and Certificates of Participation (COPs) to finance some facilities. This type of debt financing should only be used as "bridge" funding until permanent funding becomes available. The District should proceed with caution when using Municipal Lease, COPs and other debt financing, as they are reliant on development growth assumptions that if not realized may impact the District's general fund.

Table 25
Estimated Total Facility Funding

Facility Plan	
Category	Funding
State School Facility Program	$82,887,368
Developer Fees	$26,364,872
General Obligation Bond Funds	$10,346,000
Sub-Total	$119,598,240
Option #1 and Option #2	
State School Facility Program	$92,546,468
Developer Fees	$17,710,093
Sub-Total	$110,256,561
Total	$229,854,801

Table 26
Facility Cost and Facility Funding Comparison

	Facility Cost	Facility Funding	Difference
Facility Plan	$193,850,000	$119,598,240	$74,251,760
Option #1 and Option #2	$229,350,000	$110,256,561	$119,093,439
Total	$423,200,000	$229,854,801	$193,345,199

As outlined in Table 26, the District's projected funding falls short of the District's facility revenue needs. The District requires approximately $74.3 million in additional funding for the District's Facility Plan and $119.1 million of additional funding for Option #1 and Option #2, for a total of $193.4 million in additional funding need. The District will need to investigate additional revenue sources such as future general obligation bonds, Mello-Roos financing, etc. to fund the District anticipated facility needs.

L-15

APPENDIX

DEMOGRAPHIC ANALYSIS AND FORECASTS FOR SALINAS UNION HIGH SCHOOL DISTRICT (January, 14, 2008)

Prepared by
Lapkoff & Gobalet Demographic Research, Inc.

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

LAPKOFF & GOBALET DEMOGRAPHIC RESEARCH, INC.
www.Demographers.com
2120 6th Street #9, Berkeley, CA 94710-2204 • (510) 540-6424 • FAX (510) 540-6425
22361 Rolling Hills Road, Saratoga, CA 95070-6560 • (408) 725-8164 • FAX (408) 725-1479

Demographic Analysis and Forecasts for Salinas Union High School District

January 14, 2008

Executive Summary

The purpose of this report is to describe our new middle and high school enrollment forecasts for Salinas Union High School District (SUHSD, the District). It presents both the enrollment figures and the details of our forecast methodology.

If no new housing were built in West Boronda or in the Future Growth Areas (FGAs) north and east of the city of Salinas, we would expect that, by 2016, SUHSD middle school enrollments would increase by about 150 and high school enrollments would fall by about 270 (see Table 9). However, when all planned housing is built in the FGAs and West Boronda, total enrollments will increase by about 1200 middle school students and 2,800 high school students (see Table 11). The very earliest this development could be completed is 2020. The timing of housing construction in the FGAs is uncertain, so we have developed three different timing scenarios. One scenario assumes completion by 2020, another by 2029, and a third assumes that none of the housing is occupied through the end of our forecast period.

The Salinas area experienced severe enrollment declines between 2003 and 2005. This coincided with the completion of three major housing developments: CreekBridge, Harden Ranch, and Williams Ranch. The declines seem to have resulted from some community-wide changes that caused families to leave SUHSD or to shift their children out of the public schools, and there was no offsetting enrollment growth from new housing. Meanwhile, there has been another demographic shift, and most measures of enrollment change and migration have returned to more historically normal levels. We expect future enrollments to be relatively stable in the absence of housing growth. When the planned housing is built over the next decade or two, enrollments will grow, though the timing and pace of that development cannot be not known at this point.

We have identified the feeder district in which each past and current SUHSD student lived and combined their numbers with past and current enrollments (from CBEDS) in each feeder's schools. The result was hypothetical K-12 populations in each feeder.[1] Our analyses and forecasts are for these populations. In the end, we combine the populations for overall middle and high school SUHSD forecasts. There are several methodological issues associated with combining the populations, but we believe this approach produces the most accurate and informative forecasts.

[1] The elementary populations are "hypothetical" in that we assume each feeder district's enrollments represent students enrolled in its schools. The SUHSD middle and high school enrollment numbers we use reflect actual residents of the feeder districts.

L-15

An important assumption in our forecasts concerns whether the recently constructed large developments (CreekBridge, Harden Ranch, and Williams Ranch) will experience enrollment changes over time. Sometimes new developments undergo an "aging" effect, which causes high school enrollments to be low at first, to peak about 10 years after the homes are built, and then to decline. The aging effect occurs if a large share of the homebuyers has very young children. We have studied the older parts of CreekBridge, Harden Ranch, and Williams Ranch to see how SUHSD enrollments changed as the housing aged, and found inconclusive evidence of aging there. In the forecasts presented here, we have assumed that enrollments from CreekBridge, Harden Ranch, and Williams Ranch will remain constant at their current levels. Also, we assume that once housing in Monte Bella, West Boronda, and the FGAs is fully occupied, no aging effect will occur. This assumption should be monitored over time, as more data become available.

2

L-15

Table of Contents

3

Introduction

Forecasting SUHSD enrollments presents methodological challenges. First, a large number of housing units were built in the District in recent decades.[2] As a consequence, public school enrollments grew and this growth masked underlying demographic trends. We need to understand these underlying trends in order to forecast future enrollments.

Our general approach involves identifying exactly where students live in order to separate those living in recently built housing from those occupying older housing. However, we lack address data for students enrolled in each of SUHSD's seven elementary feeder districts, and cannot determine the number of these students living in recently built homes. This presents a second methodological challenge because we generally use data for students living in elementary feeders as a basis for forecasting future high school students.

A third complicating factor is that a very large number of homes is expected to be built in the Future Growth Areas (FGAs) to the north and east of Salinas. The new housing will increase SUHSD's enrollments. The timing of construction is uncertain, as are the number and type of housing units. As a result, we present three different scenarios about the timing of the projects. The most pessimistic forecast assumes no development, or at least no development during our forecast period.

This report is divided into the following sections:

1. Description of overall enrollment trends,
2. Discussion of the impact of recent housing growth on enrollments,
3. Description of future housing developments,
4. Explanation of the forecast methodology,
5. Historical analyses and forecasts by SUHSD elementary feeder district, and
6. Forecasts for SUHSD middle and high school enrollments through fall 2016.

Acknowledgments

This report was done under the direction of Karen Luna, SUHSD Manager of Planning/Facilities, and Roger C. Antón, Jr., SUHSD Superintendent, and in collaboration with Matthew A. Pettler, Planning Services Director, School Facility Consultants.

We are grateful for assistance provided by the following individuals: Charles A. Lerable, GIS Administrator, City of Salinas Information Systems; Bob Schubert, Monterey County Planning Department; Jerry Hernandez, Monterey County Housing and Redevelopment Office; Mely Lat, Supervisor, District Advisory Services, Monterey County Office of Education; and Bill Satterlee, CreekBridge Homes. Mary Johnston, Sorrento (Monte Bella) Community Sales Manager, Standard Pacific Homes; Monica Faranda, Monte Bella Sales Manager; Mimi Gitchev, Spreckels Community Sales Manager, Standard Pacific Homes; Fred, Flor de Salinas Sales; and Ana Aguillon, SUSHD Accountant, also provided needed information.

[2] The completion of several major projects by 2004 and 2005 has contributed to the cessation of enrollment growth.

Overall Enrollment Trends

After decades of enrollment growth, SUHSD enrollment trends have reversed. Middle school enrollments (seventh and eighth grades) peaked in 2003 at 4,472 students. By fall 2007, enrollments had fallen 11 percent, to 3,997. Meanwhile, high school enrollments peaked in 2004 and remained at that level for the next three years. See Chart 1.

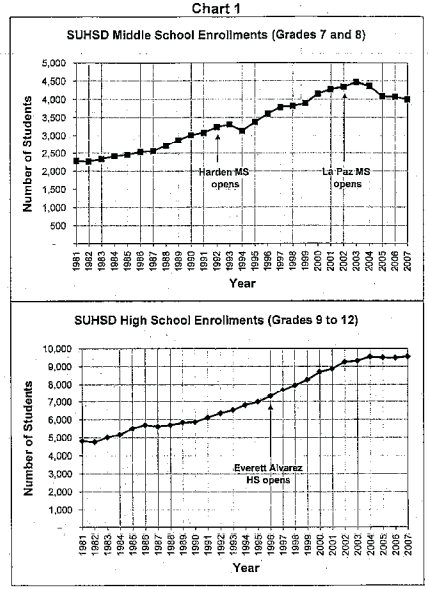
In addition to looking at overall enrollment trends, we also study what demographers call "grade progressions." This measure compares the number of students in one grade with the number of students in the following grade the following year. For example, we compare the number of ninth graders in fall 2006 with the number of tenth graders in fall 2007.

Grade progressions are important for two reasons. First, assumptions about their future levels are a key element of the enrollment forecast model. In the standard forecast methodology, we start with the current number of students in each grade and advance them one grade to obtain next year's enrollments. We apply grade progression rates or ratios to adjust the number of students as they progress one year. The second reason the grade progressions are important is that they indicate demographic behavior of the population, including the population's mobility, preferences regarding private schooling, and the district's retention policies.

Chart 2 shows grade progressions between fall 2006 and fall 2007 for the combination of SUHSD students and students enrolled in all its elementary feeder districts. Later we report this information for each of the five largest feeders, which will be more informative. Note that all of the grade progressions except for K>1 are negative, meaning that more students left SUHSD and its feeders than moved in. This means that households with children are migrating out of the District, or are switching from public to private schools.

L-15

Chart 1



L-15

6

L-15

Chart 2

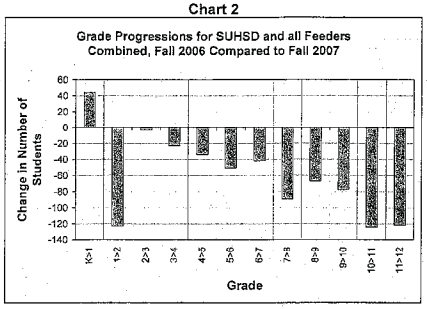


Chart 3 summarizes the grade progressions for each school level from 1981 to 2007. Grade progressions for the most recent pair of years (2006>2007) are shown in the farthest right column of each graph. We show percent changes in the number of students in each school level from one year to the next, beginning with the 1981>1982 progressions.

The most recent set of elementary and high school grade progressions show that fewer students left the public school districts than in most recent years; they now resemble the historic average. Elementary and middle school grade progressions were especially low between 2003 and 2005. At the high school level, grade progressions have been steadily improving (fewer students have left) during the last four years, possibly a result of the change in SUHSD's retention policy.[3]

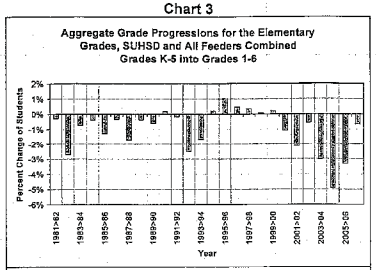
These grade progressions are a result of many factors, one of which is housing growth. As new developments are built, if families move into the area from places outside the District, enrollments grow and the grade progressions increase. These increases can mask an underlying trend, such as the enrollment decline often associated with aging of housing. When we can, therefore, we eliminate the effect of housing growth from the grade progressions and study grade progressions in newer and older housing separately. When we subtract students from the larger new housing areas (CreekBridge, Harden Ranch, Williams Ranch, Monte Bella), we can study underlying demographic trends in the older housing areas. We have done this in our analyses of feeder district and SUHSD enrollments. But first, we discuss housing growth.

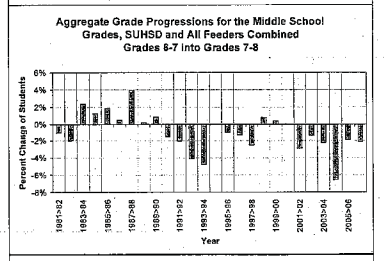
[3] Around 2003, the District began to advance students one grade for each year of enrollment, regardless of the number of credits earned.

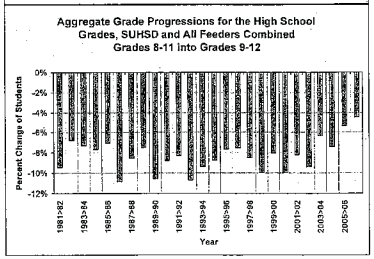
7

L-15

Chart 3







8

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

Impact of Recent Housing Growth on Enrollments

As we show below, SUHSD enrollment growth in the 1990s and early 2000s largely resulted from occupancy of new housing in several large developments. In 1984, the City of Salinas annexed CreekBridge and Williams Ranch, and in 1989 it annexed Harden Ranch. Together, these three developments contain approximately 7,229 units, which is currently 17 percent of the city's housing stock. CreekBridge took the longest to build, with most units constructed between 1989 and 2004. Most of Williams Ranch was built between 1995 and 2002, and most of Harden Ranch was built from 1993 to 2004. Chart 4 shows the annual number of units built in each of these developments, and Map 1 shows their location.

Note that all three developments were completed by the mid-2000s, and at the same time SUHSD enrollment growth slowed.

Table 1 shows the number of students generated from the three large developments built recently in Salinas, along with the student yields from each project (number of students divided by number of housing units). In fall 2007, 1,829 high school students and 623 middle school students attended SUHSD schools. Overall, the high school yield is .25, while the middle school yield is about half that for feeders with middle school students enrolled in SUHSD schools.

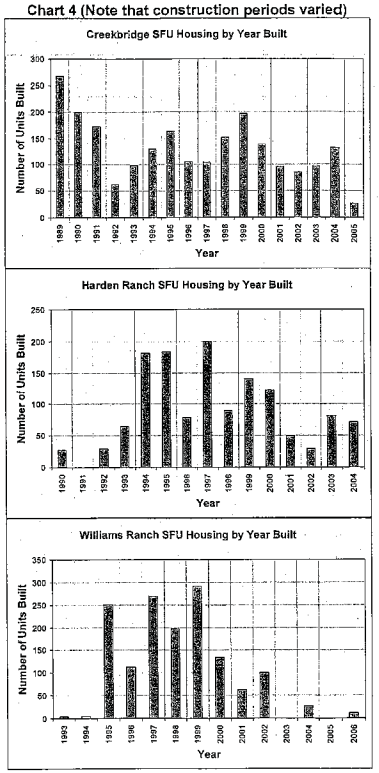
Table 1
Enrollments and Yields in Creekbridge, Harden Ranch, and Williams Ranch, Fall 2007

	# Units	Middle School Students		High School Students	
		# Students	Yield	# Students	Yield
Creekbridge	2,598	259	0.10	685	0.26
Harden Ranch	2,561	not applicable		452	0.18
Williams Ranch	2,070	364	0.18	692	0.33
Total	7,229	623	0.13	1,829	0.25

9

L-15

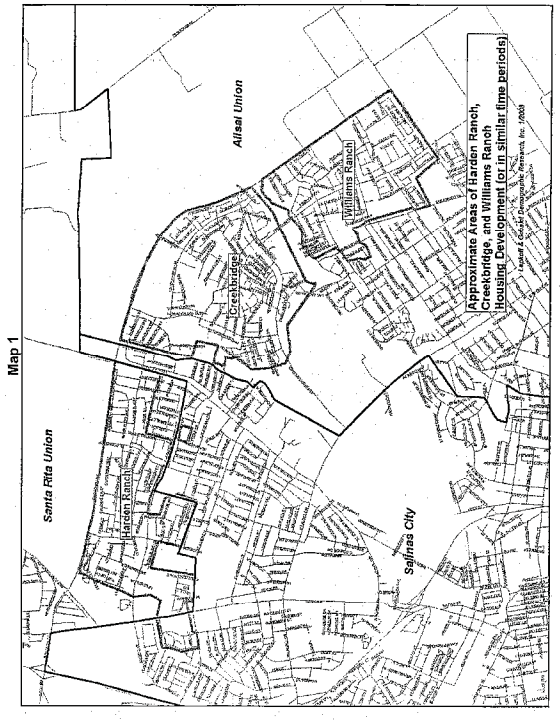
Chart 4 (Note that construction periods varied)



10

L-15

11



L-15

Future Housing Developments

Under Construction

New housing continues to be built in Salinas, but at a slower pace. The main development now underway is Monte Bella, with 853 total housing units (see Map 2). About 45 percent of the project was completed by October 2007.[4] The pace of construction has slowed, however, as a result of a poor housing economy.

Future Growth Areas

The City of Salinas has identified three "Future Growth Areas" (FGAs) to the north and east of its current boundaries. These developments were submitted to LAFCO (Local Agency Formation Commission) recently, and, if approved, will then go to the City for consideration. In due course, Salinas will annex the FGAs, and it is anticipated that construction will occur simultaneously in all three. Map 2 shows these areas.

The number of projected housing units in the three FGAs is now estimated at 11,500.[5] Most will be single-family homes, but there will also be a significant number of apartments. The number and mix of housing types may change by the time the developments are approved.

As housing in these areas is constructed, Salinas' population and student enrollments will grow. The earliest these developments could begin to be occupied is 2011, and construction is expected to take at least 10 years to complete.[6] Perhaps a more likely estimate for first occupancy is closer to 2015 or even 2020.

West Boronda

Plans for the West Boronda area should be finalized by the end of 2008. It is anticipated that occupancy will begin by 2011, and will take 10 years to complete. The Boronda area is within Salinas City School District, and will contribute both high school and middle school students to SUHSD.

Rancho San Juan

The proposed Rancho San Juan/Butterfly Village development is located in the county area north of Salinas, in the Santa Rita and Lagunita School Districts. Plans currently call for 1,660 homes.[7] This development is currently in litigation, so it is unclear when and if it will be built. We do not include this development in the forecasts, but if it were built, we would expect about 415 high school students to live in the 1,660 homes. Middle school students living there would attend the Santa Rita District.

[4] According to Mary Johnston, Sorrento (Monte Bella) Community Sales Manager, Standard Pacific Homes and Monica Faranda, Monte Bella Sales Manager.
[5] At one time, the number of units was stated to be 15,000 or more.
[6] Bill Satterlee, CreekBridge II representative, helped us immensely by providing information about development in the FGAs, although he cautions that timing, unit counts, and housing mix are still very uncertain.
[7] According to Bob Schubert, Monterey County Planning Department.

12

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

Smaller Developments

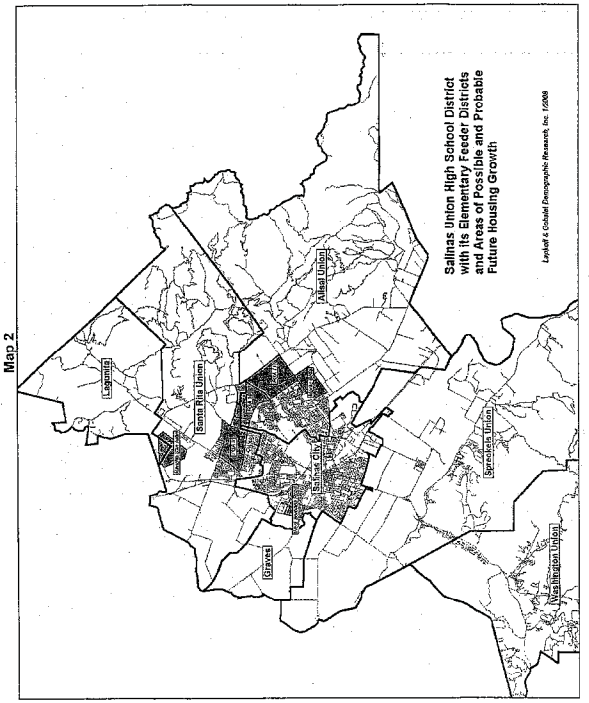
It is expected that several smaller housing developments will be built within the planning horizon (the next 10 years). Table 2 shows these developments as well as the larger developments discussed above.

13

L-15

14

Map 2



L-15

15

Table 2

Name of Development	Type	# Units	Feeder District	Timing	Notes
Monte Bella	SFU	853	Alisal	under construction, first occupancy 2005	380 occupied Oct 2007
Per de Salinas	Condominiums	280	Salinas City	under construction, first occupancy 2006	106 occupied Oct 2007
Spreckels	SFU	73	Spreckels	under construction, first occupancy late 2007	0 occupied Oct 2007
Terrace Village	Apts	171	Salinas City	under construction, first occupancy late 2008	
Soledad Street	MFU	100	Salinas City	under construction, first occupancy late 2008	
West Boronda	mixed	690	Salinas City	first units 2010, 10 years to complete	20%+ affordable
Commons at Rogge Rd	SFU and Apts	171	Santa Rita		100% affordable
Bollenbacher & Kelton	SFU	214	Washington		
Bollenbacher & Kelton	MFU	65	Washington		
Rancho San Juan/Butterfly Village	SFU	739	Santa Rita and Lagunita	under litigation	
Rancho San Juan/Butterfly Village	MFU	408	Santa Rita and Lagunita	under litigation	
Future Growth Areas					
East (FGA 11)	mixed		Alisal	first occupancy 2010 (or later)	
			Alisal (most) and Santa Rita (small part)	first occupancy 2010 (or later)	
Central: Creekbridge II (FGA 10)	SFU	approx. 11,500	Alisal (most) and Santa Rita (small part)	first occupancy 2010 (or later)	
Central: Creekbridge II (FGA 10)	MFU (apts) > 500 units		Santa Rita (most); Alisal and Salinas City (small parts)	first occupancy 2010 (or later)	
West (FGA 9)	mixed?			first occupancy 2010 (or later)	

L-15

Forecast Methodology

The standard technique for forecasting school enrollments, called the cohort survival method, begins with the number of students in each grade and advances them one grade to estimate the following year's enrollments. As students progress to the next grade, their numbers may change if students move into or out of the community and into or out of private schools, or if some students repeat or skip grades. Typically, we measure historical "grade progressions" to determine the likely change in cohort sizes as students progress to the next grade. These historical grade progressions are then applied to forecast models to adjust our forecasts of future students.

Students from new housing inflate our measures of the District's historical grade progressions. We do not expect the past pace of housing construction to continue, so we do not want to use historical grade progressions in our forecast model. Instead, it is best to remove students from recently built housing from our historical measures. Once separated, a forecast is made for each group.

Historical grade progressions for students living in older housing reflect the migration (and other) factors that have affected the population outside the housing growth areas. With the students from housing growth eliminated, our measures of historical grade progressions are more likely to be stable.

We use a different forecast method to determine likely future numbers of students living in recently built housing areas (CreekBridge, Harden Ranch, and Williams Ranch).

Producing these enrollment forecasts for a high school district with substantial housing growth is challenging, to say the least, because we need to rely on feeder district enrollments in a cohort survival model. And because we have no elementary student address data, we cannot separate students who live in new housing from the rest of the student population. On the other hand, this separation is possible for SUHSD students because we have student address data. We have address data for SUHSD for fall 1994 through fall 2007, and have measured how neighborhood enrollments in SUHSD schools have changed over time.[8]

Unfortunately, we cannot do the same with the feeder enrollments, since address data are not available. This severely handicaps the forecaster. Without separate counts of feeder district students living in newer and older housing, we have trouble using a cohort survival method when we split the SUHSD student population into new and older housing areas. We can try to estimate the feeder populations in the older areas, but the estimation technique is not very good.

Another problem is that when students first enroll in SUHSD schools, we know where they live, but we do not know which feeder (if any) they attended. Our grade progression

[8] We do not have Mt. Toro students in our database before 2003, so high school enrollments are slightly understated for 1994-2002.

16

L-15

measures may be skewed. For example, suppose that Santa Rita Union School District reduced the number of Inter-District Transfer (IDT) students it enrolled. From our perspective, the IDT students inflate Santa Rita's enrollment numbers, and when we compare SUHSD students living in Santa Rita with the enrollments in the Santa Rita School District, the elementary-to-high school grade progressions may be lower than they really should be. When the number of IDT students is substantially reduced, for example, the eighth-to-ninth grade progression measure will rise.

We suspect that Santa Rita may indeed have reduced its IDT population. This hypothesis arises from the fact that while the number SUHSD students living in Santa Rita increased substantially as Harden Ranch was constructed, elementary enrollments did not increase. How can this be? Other types of enrollments in Santa Rita must have declined, offsetting the gains from Harden Ranch. One obvious possibility is that Santa Rita reduced its IDT numbers to make room for Harden Ranch students.

Salinas City School District might also have had changing IDT totals. As its own resident student population shrank, the District has encouraged more IDT students to attend its schools. It is possible, for example, that larger numbers of Alisal students have enrolled in Salinas City elementary schools. All of this makes our middle and high school enrollment forecasts less certain, because we cannot make the appropriate comparison of elementary and high school residents of elementary feeders.

Historical Analyses and Forecasts by Feeder District

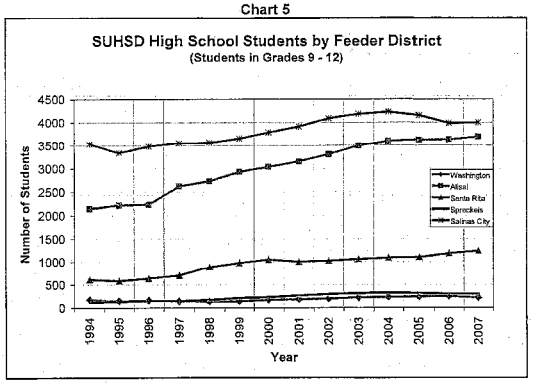
SUHSD has seven elementary feeder districts: Salinas City, Alisal, Santa Rita, Washington, Spreckels, Lagunita, and Graves. Lagunita and Graves are so small that we do not discuss them in the text, but their residents are included in the forecast of SUHSD students. Chart 5 shows SUHSD students living in each of the five larger feeder districts. The Salinas City area contains the largest number of SUHSD students, but the Alisal area is a close second. The Santa Rita area contains a much smaller share of SUHSD students, followed by even smaller shares in Spreckels and Washington.

In the rest of this section we provide analyses and forecasts for each of the five largest feeder districts.

17

L-15

Chart 5



Salinas City School District

Chart 6 shows overall enrollments by school level for Salinas City School District (SCSD) students as well as SUHSD middle and high school students living in the this feeder. Elementary enrollments were fairly stable for a decade, but between 2003 and 2005, numbers fell sharply and remained at the lower level through 2007. Middle school enrollments show a pattern similar to the elementary, with the exception that there was some enrollment growth between 1994 and 2004. High school enrollments resemble the middle school pattern, except lagged a year or two. Enrollments fell modestly between 2004 and 2006, with 2007 enrollments very similar to 2006 figures.

The enrollment pattern in SCSD is somewhat unusual. Elementary enrollment trends are usually replicated a few years later by middle- and then high school enrollment trends. This is not the case with Salinas City elementary/middle/high school students, which experienced the same pattern at about the same time. The simultaneity suggests a "period effect," which is an effect that occurs during a particular time period and affects all age groups at the same time. Substantial changes in the economy or housing market could create a pattern like this.

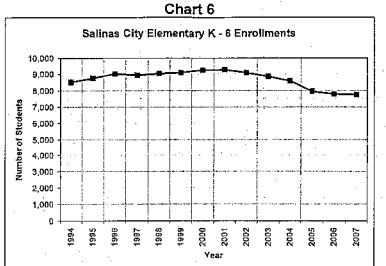
18

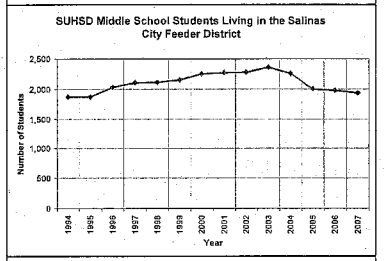
County of Monterey Resource Management
Agency, Planning Department

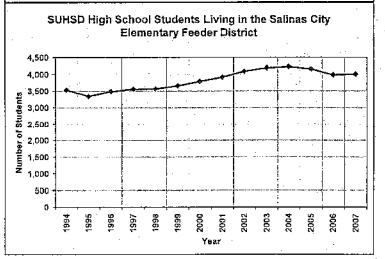
Comment Letters
Local Agencies

L-15

Chart 6







19

L-15

Chart 7 shows the number of SUHSD high school students living within the portions of major developments that are in Salinas City District. Only a small area of Harden Ranch is in Salinas City, and enrollments from the new housing were stable. Virtually the entire high school enrollment increase between 1995 and 2004 was *not* a result of new housing. Instead, the enrollment increase could have resulted from families moving into the older housing in the elementary district or from more families than in the past choosing public, rather than private, schools.

Chart 7

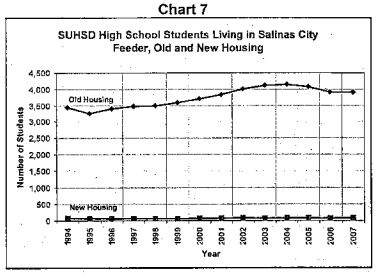
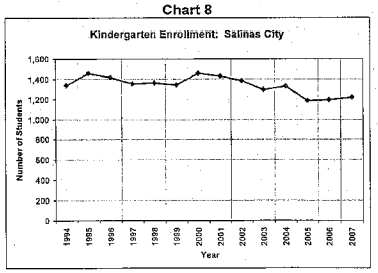


Chart 8 shows SCSD kindergarten enrollments, which peaked in 2000 and then declined. This large cohort is now in the seventh grade. Progressively smaller cohorts will follow, eventually reducing SUHSD enrollments from this area.

Chart 8



20

L-15

Chart 9 shows the aggregated grade progressions for Salinas City School District. The number of kindergartners through fifth graders is compared with first through sixth graders the following year. This is a measure of the change in cohort size as students progressed to the next grade. These grade progressions are usually most affected by migration into or out of the District, and by transfers between public and private schools. This graph shows that Salinas City Elementary lost many students between fall 2004 and fall 2005, and to a lesser extent the year before and after. More than eight percent of the students that were attending SCSD in fall 2004 left SCSD by fall 2005. Note that the most recent year's grade progressions resemble the historical norm.

Chart 9

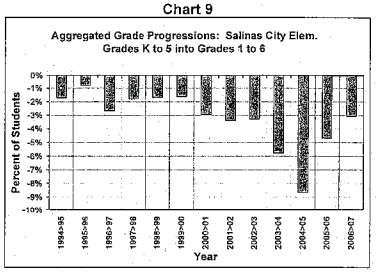
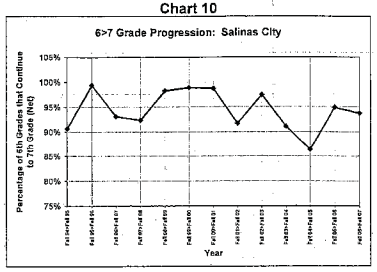


Chart 10 shows the sixth to seventh grade progression over time. This grade progression measure compares Salinas City's sixth grade class with the number of SUHSD seventh graders living in the Salinas City area the following year. In all but one year, the ratio was between 90 and 100 percent. An important assumption in the forecast model concerns what this ratio will be in the future. The fact that it has been relatively stable gives greater certainty to the forecast for SUHSD students living in SCSD.

21

L-15

Chart 10



Forecast of SUHSD Students Living in SCSD

Because there has been relatively little housing growth in the Salinas City district, we can make a forecast ignoring the effect of past housing growth on the grade progressions, using a typical cohort survival model. Moreover, the fact that there was some housing growth in the past means that the grade progressions were slightly higher than they otherwise would have been. Since a similar amount of housing growth is anticipated in this elementary district, the historical grade progressions are appropriate to use in our forecast model; they implicitly assume that some small amount of housing growth will continue. However, we still explicitly account for development in Tynan Village Apartments, since a relatively large number of students are likely to live in this future development.[9] The West Boronda development would also generate students, but we account for them elsewhere.

A major assumption for the forecast model concerns the set of grade progressions. We believe that the very low grade progressions between 2003 and 2005 are unlikely to recur. Instead, for the Medium forecast, we use the most recent set of grade progressions, which is similar to the historical norm.

Table 3 shows our forecast of SUHSD students living in the Salinas City area. In the absence of the West Boronda development (shown later), middle school enrollments would decline by about 100 students between 2007 and 2012, while high school enrollments would decline by about 300 students.

[9] We model 11 students per grade when Tynan Village is fully occupied. This development includes 171 apartments, of which 40 percent are affordable.

L-15

Table 3

Component Forecast for SUHSD Students Living in Salinas City Elementary Feeder

Students Living Outside Major New Housing Developments

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7	969	958	956	940	899	917	959	981	981	981
8	929	932	921	919	903	862	880	922	944	944
9	1,023	981	984	973	971	955	914	932	974	996
10	954	972	930	933	922	920	904	863	881	923
11	1,022	902	920	878	881	870	868	852	811	829
12	910	967	847	865	823	826	815	813	797	758
7-8 Total	1,898	1,890	1,877	1859	1802	1779	1839	1903		
9-12 Total	3,909	3,822	3,681	3649	3597	3571	3501	3460	3463	3504

Students from New Housing: Harden Ranch

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7	19	21	21	21	21	21	21	21	21	21
8	21	21	21	21	21	21	21	21	21	21
9	24	21	21	21	21	21	21	21	21	21
10	22	22	22	22	22	22	22	22	22	22
11	24	21	21	21	21	21	21	21	21	21
12	18	18	18	18	18	18	18	18	18	18
7-8 Total	40	42	42	42	42	42	42	42	42	42
9-12 Total	88	82	82	82	82	82	82	82	82	82

Students from Future Housing: Tynan Village apartments

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7		5	11	11	11	11	11	11	11	11
8		5	11	11	11	11	11	11	11	11
9		5	11	11	11	11	11	11	11	11
10		5	11	11	11	11	11	11	11	11
11		5	11	11	11	11	11	11	11	11
12		5	11	11	11	11	11	11	11	11
7-8 Total	0	10	22	22	22	22	22	22	22	22
9-12 Total	0	20	44	44	44	44	44	44	44	44

Sum

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7	988	984	988	972	931	949	991	1,013	1,013	1,013
8	950	958	953	951	935	894	912	954	976	976
9	1,047	1,007	1,016	1,005	1,003	987	946	964	1,006	1,028
10	976	999	963	966	955	953	937	896	914	956
11	1,046	928	952	910	913	902	900	884	843	861
12	928	990	876	894	852	855	844	842	826	785
7-8 Total	1,938	1,942	1,941	1923	1866	1843	1903	1967	1989	1989
9-12 Total	3,997	3,924	3,807	3775	3723	3697	3627	3586	3589	3630

L-15

Alisal Union School District

Chart 11 shows overall enrollments by school level for Alisal Union School District. Elementary enrollments grew from 1994 (and earlier) through 2000. After 2003, enrollments declined very slightly and remained stable after 2005. This pattern after 2003 was very similar to that experienced in SCSD, but the decline was not as great because of the construction of Monte Bella housing. Middle school enrollment patterns resemble the elementary level, but with a higher growth rate than the elementary between 1994 and 2000. There was less of an enrollment decline in the middle schools after 2003 than in the elementary grades. SUHSD high school enrollments from the Alisal area also increased after 2004, and have not yet begun to decline. As might be expected, high school enrollment trends have lagged a few years behind the middle school enrollment trends.

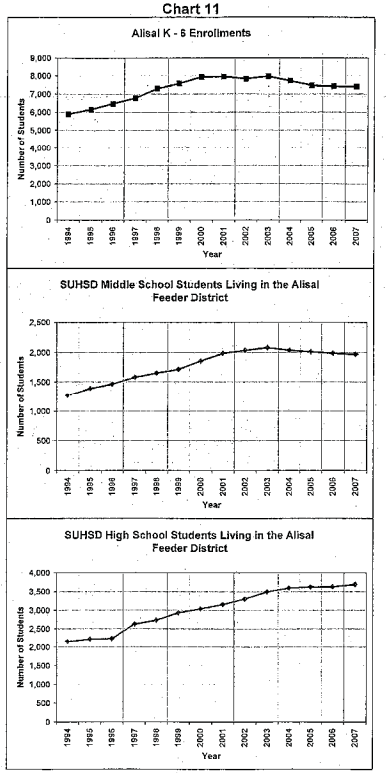
Charts 12 and 13 show the numbers of SUHSD middle and high school students living in the new housing of major developments located in the Alisal school district (CreekBridge, Williams Ranch, and Monte Bella) and in older housing. Once we removed students living in the large developments, we found that middle school enrollments declined slightly while high school enrollments have been stable in this area. Virtually all SUHSD enrollment growth in the Alisal area is from students living in the new developments. The fact that enrollments outside the large development areas are fairly stable is an excellent illustration of why we separate students from new housing when we do forecasts. In this case, the increasing numbers of students from new housing disguised what was going on in the older housing in this part of the District.

Also, we see that enrollments from new housing have stabilized in the middle schools but continue to increase in the high schools. This difference suggests a slight "aging" effect in the new housing: it is likely that a somewhat high proportion of families buying the new housing had young children. As the housing ages, high school enrollments increase when the young students reach the higher grades.

24

L-15

Chart 11



25

L-15

Chart 12

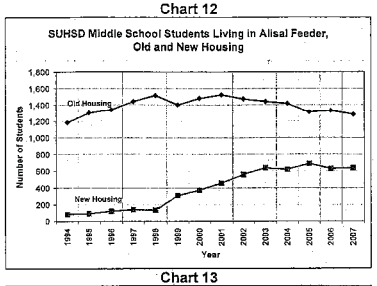


Chart 13

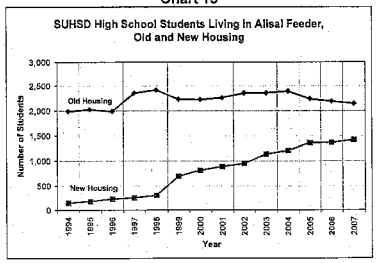


Chart 14 shows Alisal's kindergarten enrollments, which have been fairly stable. However, kindergarten enrollments have been higher than the historical norm for the last two years, which will eventually increase the number of SUHSD students from the Alisal area.

L-15

Chart 14

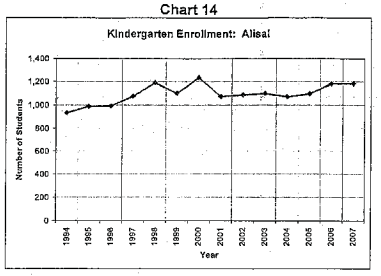
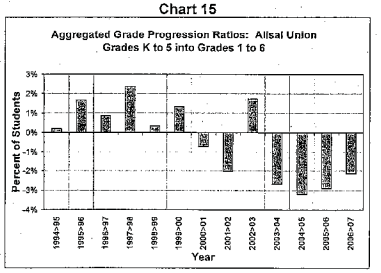


Chart 15 shows the aggregated grade progressions for Alisal Union School District. Students in kindergarten through fifth grades are compared with the number of first through sixth graders the following year. The ratios measure the change in cohort size as students progressed to the next grade. The grade progressions are usually most affected by migration into and out of the district, and by transfers between public and private schools. These data include the enrollment effects of new housing: the grade progressions are inflated by the students from new housing and should not be used to forecast future enrollments. Interestingly, despite some modest housing growth (mainly from Monte Bella), recent grade progressions are negative, meaning that more students have left the elementary district than moved in.

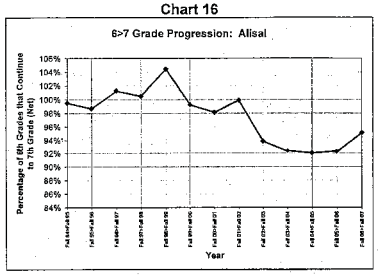
Chart 15



L-15

Chart 16 shows the sixth to seventh grade progression over time. This progression compares Alisal's sixth grade class one year with the number of seventh grade SUHSD residents of the Alisal area the following year. Once approximating 100 percent, the rate has been between 92 and 95 percent for a number of years. Perhaps the higher progression for the most recent pair of years results from students moving into Monte Bella homes.

Chart 16



Components of Forecast of SUHSD Students Living in AUSD
Because of the large amount of past and current housing growth in Alisal, the forecast is quite complicated. We forecasted four different groups of students in this part of the high school district:

1. Students living in the existing large developments (CreekBridge and Williams Ranch),
2. Students living in developments under construction (Monte Bella),
3. Students anticipated from future housing developments, and
4. Students in the rest of the student body.

Forecast of Students Living in CreekBridge and Williams Ranch Homes
CreekBridge I and Williams Ranch were completed around 2004. To forecast students from these developments, we used a cohort survival method, but needed some way of estimating the size of the seventh grade class. The forecast keeps the number of seventh graders from these areas at their current level of 327 students. We then forecast subsequent grades by aging (advancing students one grade for each forecast year) the seventh grade class and applying the current year's grade progressions.

28

L-15

Forecast of Students Living in Developments Under Construction
To forecast students from Monte Bella, we assumed that current enrollments from the area reflect 45 percent of eventual enrollments, as 45 percent of the development has been occupied. We assume the development will be completed by 2013.[10]

An implicit assumption made by the forecast model is that the number and age distribution of students living in Monte Bella will not change over time. Sometimes there is an aging effect in new developments, such that high school enrollments would first increase and then decrease over the neighborhood's first 10 to 20 years. We chose not to assume this aging effect after reviewing enrollments by age of housing in many of Salinas' subdivisions. While some areas showed enrollment increases over time as they aged, many areas did not experience such increases. This assumption should be monitored once the development is completed.

Forecast of Students Outside Major Housing Developments
To forecast middle and high school students in the older parts of the Alisal district (outside of CreekBridge, Williams Ranch, and Monte Bella), we used a cohort survival method but needed some way to estimate the size of the seventh grade class.

Forecasting the seventh grade class was challenging. We used current Alisal cohort sizes to do this.[11] The seventh grade class first shrinks for several years, and then increases. This follows the general pattern of Alisal's recent kindergarten enrollments.

Total Forecast of SUHSD Students Living in Alisal District
Table 4 shows the enrollment forecast for each housing group and the combined total forecast. Overall, SUSHD enrollments increase a bit. Middle and high school enrollments each increase by about 100 students over the 10-year period. Most of the increase is from Monte Bella. There is a slight increase in the number of students living in CreekBridge and Williams Ranch. Meanwhile, the number of students living in the area's older housing continues to be fairly stable.

[10] This timing is assumed because the development is in its third year of occupancy and the housing market has slowed.
[11] Specifically, we applied the most recent set of Alisal grade progressions to Alisal's current students by grade and adjusted for the estimated effect of Monte Bella on the current grade progressions. This gave a forecast of students, by grade, in Alisal. We applied the forecasted percentage change in the sixth grade class and to the SUHSD seventh grade class. Implicit in this estimate is that students in the large developments are evenly distributed through the grades. Ideally, we would use student address data from the feeder district and count the number of students from outside the new developments explicitly, providing the basis for a straightforward cohort-survival forecast.

29

L-15

Table 4

Component Forecast for SUHSD Students Living in Alisal Feeder District

Students Living Outside Major New Housing Developments

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7	657	614	618	613	620	672	665	665	665	665
8	623	611	568	572	567	574	626	619	619	619
9	604	570	558	515	519	514	521	573	566	566
10	554	561	527	515	472	476	471	478	530	523
11	492	489	496	462	450	407	411	406	413	465
12	492	428	425	432	398	366	343	347	342	349
7-8 Total	1,280	1,225	1,186	1185	1187	1246	1291	1283		
9-12 Total	2,142	2,048	2,006	1924	1839	1763	1746	1804	1850	1902

Students from New Housing: Creekbridge and Williams Ranch

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7	327	327	327	327	327	327	327	327	327	327
8	310	349	349	349	349	349	349	349	349	349
9	392	363	402	402	402	402	402	402	402	402
10	350	390	361	400	400	400	400	400	400	400
11	351	346	386	357	396	396	396	396	396	396
12	324	343	338	378	349	388	388	388	388	388
7-8 Total	637	676	676	676	676	676	676	676	676	676
9-12 Total	1,417	1,442	1,487	1537	1547	1586	1586	1586	1586	1586

Students from Monte Bella

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7	28	34	39	45	50	56	62	62	62	62
8	22	26	31	35	40	44	48	48	48	48
9	38	46	53	61	68	76	84	84	84	84
10	33	40	46	53	59	66	73	73	73	73
11	29	35	41	46	52	58	64	64	64	64
12	32	38	45	51	58	64	70	70	70	70
7-8 Total	50	60	70	80	90	100	110	110	110	110
9-12 Total	132	158	185	211	238	264	290	290	290	290

Sum

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7	1,012	975	984	984	998	1,055	1,053	1,053	1,053	1,053
8	955	986	948	956	955	967	1,023	1,016	1,016	1,016
9	1,034	979	1,013	978	990	992	1,007	1,059	1,051	1,051
10	937	991	934	968	931	942	943	951	1,003	995
11	872	870	923	865	898	861	871	865	873	925
12	848	809	808	861	805	838	801	806	800	808
7-8 Total	1,967	1,961	1,932	1941	1953	2022	2077	2069	2069	2069
9-12 Total	3,691	3,648	3,678	3672	3624	3633	3622	3680	3727	3779

30

L-15

Santa Rita Union School District

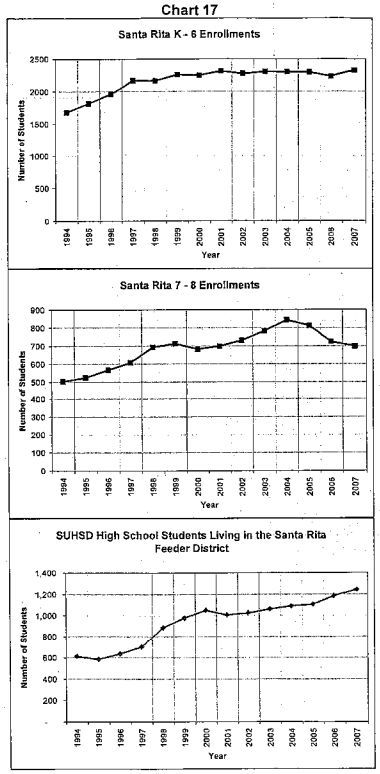
Chart 17 shows the overall enrollments by school level for Santa Rita Union School District (SRUSD). Santa Rita's K-6 enrollments have been remarkably stable considering that Harden Ranch was constructed during the late 1990s. The middle school enrollment pattern is quite different from the elementary one, and levels are higher than what we would expect, even in an area with housing growth. Santa Rita's middle school enrollments increased substantially between 1994 and 2004. Enrollments declined after 2004, partly because housing construction had ended and no doubt partly for the same reason that SCSD and Alisal enrollments declined. High school enrollment trends appear to be lagged a few years behind the middle school trends, with enrollments continuing to increase to date.

The elementary enrollment pattern here is rather puzzling. Perhaps SRUSD reduced the number of inter-district transfer students to make room for the Harden Ranch students. This would explain why elementary enrollments remained flat over time.

31

L-15

Chart 17



32

L-15

Chart 18 shows the numbers of SUHSD middle and high school students living in major developments (Harden Ranch) and in older housing within this elementary feeder. Once we separate students living in the large developments, we see that since the late 1990s, enrollments have actually been quite stable in the rest of the student population. Virtually all of the enrollment growth is from Harden Ranch. The fact that enrollments outside the large development areas are fairly stable is another excellent illustration (as with Alisal) of why we measure students from new and older housing separately. In this case, the students from new housing disguised enrollment trends in the older housing.

Chart 18

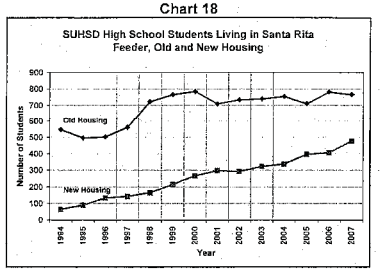
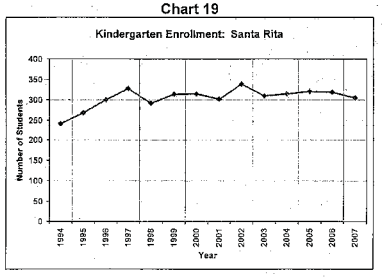


Chart 19 shows SRUSD kindergarten enrollments, which have been fairly stable since the late 1990s, despite the construction of Harden Ranch.

Chart 19



33

L-15

Chart 20 shows the aggregated grade progressions for Santa Rita. Students in kindergarten through seventh grades are compared with students in first through eighth grades the following year. These ratios are a measure of the change in cohort size as students progressed to the next grade. The grade progressions are usually most affected by migration into or out of the District, by transfers between public and private schools, and by changes in the number of inter-district transfer students. These data include the effects of migration as a result of new students entering from Harden Ranch. As a result, the grade progressions prior to 2004 are inflated by the students from Harden Ranch and should not be used to forecast future enrollments.

Chart 20

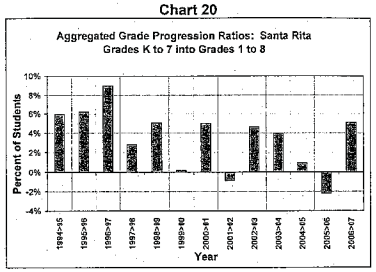
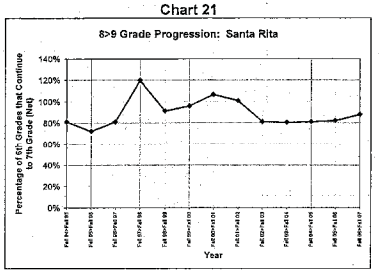


Chart 21 shows the eighth-to-ninth grade progression over time. This grade progression compares students in Santa Rita's eighth grade class with the following year's SUHSD ninth graders living in the Santa Rita feeder district. The rate of progression has been about 80 percent for the last five years. Prior to 2004, the grade progression was quite high, probably as a result of new students entering the community to live in Harden Ranch homes.

L-15

Chart 21



Components of Forecast of SUHSD Students Living in SRUSD
As with Alisal, the past and future housing growth complicates the forecast model for students living in Santa Rita. We forecast three different groups in Santa Rita:

1. Students living in the existing large developments (Harden Ranch),
2. Students anticipated in future housing developments, and
3. Students in the rest of the student body.

Forecast of Students Living in Harden Ranch
Harden Ranch is completely built out at this time. Enrollments have been increasing, despite the fact that most of the housing was completed by 2004. Sometimes the average age of students in housing increases over time because families with younger children are slightly more likely to buy new housing. If this is the case, and many original owners remain in their homes, high school enrollments peak in about 10 years. If, in fact, this is happening in Harden Ranch, then high school enrollments are probably peaking now, since most of this development was built between eight and 13 years ago.

We categorized enrollments in Harden Ranch by the year units were built. We found that many if its subdivisions built at different times had an unusual enrollment increase in the last three years. These simultaneous increases suggest that the recent (2004 through 2007) increase in Harden Ranch enrollments is a "period effect." Period effects are events limited to a particular time period, with an exogenous cause such as a change in the economy, and are probably not related to the age of housing. In this case, enrollments are likely to remain at their current level, or perhaps to continue to increase.

It is not clear how to forecast future enrollments from this area. If there is an aging effect, enrollments are likely to start declining within the next few years. If there is no aging effect, we ought to assume that enrollments will remain at their current level. Our

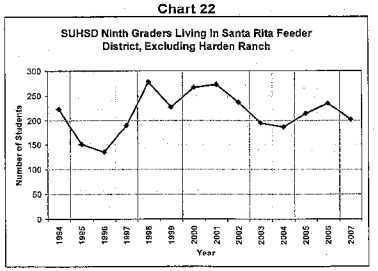
Medium forecast assumes that Harden Ranch enrollments will remain stable at 476 students.

Forecast of Students from Future Housing
Within the foreseeable future, there is one smaller project in this feeder district, The Commons at Rogge Road. It will consist of 171 affordable housing units, with at least some occupancy by fall 2008. We expect 43 high school students to be enrolled in SUHSD schools (.25 students per unit) when the project is completed.

Rancho San Juan is also in the Santa Rita area, but it is currently under litigation, and we assume that it will not be built within the next 10 years. Although we did not include this development in our forecasts, the District should monitor plans for its construction.

Forecast of Students in Older Housing
To forecast students in Santa Rita's older housing (outside Harden Ranch), we use a cohort survival method but must first forecast the size of the ninth grade class. Forecasting the ninth grade class is challenging, however.[12] Chart 22 shows the ninth grade class in Santa Rita outside Harden Ranch. Note that enrollments have fluctuated quite a bit over time, but the long-term average (215 students) is close to the size of the current ninth grade class (202 students). We use the long-term average to forecast future ninth grade classes. The most recent set of grade progressions is used to forecast the remainder of the grades.

Chart 22



Total Forecast of SUHSD Students Living in SRUSD
Table 5 shows the enrollment forecast for each student component. Overall, forecasted enrollments are quite stable, increasing only as a result of future housing construction.

[12] We cannot base SUHSD's ninth grade class on Santa Rita's eighth grade class because part of Santa Rita's eighth grade class lives in Harden Ranch. Our component model requires counts of students who live outside Harden Ranch.

Note, however, that this forecast assumes that future Harden Ranch enrollments will be stable, given that construction has been completed. This is our most uncertain assumption.

Table 5

Component Forecast for SUHSD Students Living in Santa Rita Feeder District

Students Living Outside Major New Housing Developments

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
9	202	215	215	215	215	215	215	215	215	215
10	210	177	190	190	190	190	190	190	190	190
11	193	208	175	188	188	188	188	188	188	188
12	160	178	193	160	173	173	173	173	173	173
9-12 Total	765	778	774	754	767	767	767	767	767	767

Students from New Housing: Harden Ranch

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
9	122	122	122	122	122	122	122	122	122	122
10	124	124	124	124	124	124	124	124	124	124
11	106	106	106	106	106	106	106	106	106	106
12	124	124	124	124	124	124	124	124	124	124
9-12 Total	476	476	476	476	476	476	476	476	476	476

Students from Future Housing (Commons at Rogge Road)

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
9		5	11	11	11	11	11	11	11	11
10		5	11	11	11	11	11	11	11	11
11		5	11	11	11	11	11	11	11	11
12		5	10	10	10	10	10	10	10	10
9-12 Total	0	20	43	43	43	43	43	43	43	43

Sum

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
9	324	342	348	348	348	348	348	348	348	348
10	334	306	325	325	325	325	325	325	325	325
11	299	319	292	305	305	305	305	305	305	305
12	284	307	327	294	307	307	307	307	307	307
9-12 Total	1,241	1,274	1,293	1,273	1,286	1,286	1,286	1,286	1,286	1,286

Washington Union School District

Relatively few students attending SUHSD schools live in Washington Union (WUSD). Thus, although there may be substantial changes in Washington's elementary enrollments, there will be little enrollment impact for SUHSD.

Chart 23 shows overall enrollment trends by school level in WUSD. Elementary enrollments have been fairly stable since 1994, as have middle school enrollments (grades 7 and 8), though there are more annual fluctuations (random variations) because of the smaller population base. In contrast, the number of high school students living in

L-15

the area has increased substantially. Between 1999 and 2006, high school enrollments increased 81 percent, or about 100 students. In 2007, high school enrollments declined. As with Santa Rita, these facts suggest that the aggregated feeder enrollments are not a good indicator of future high school enrollments from the elementary school district.

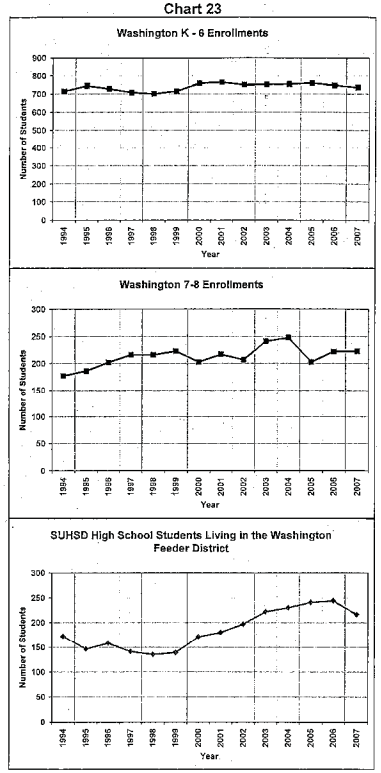
38

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

Chart 23



39

L-15

Although there has been some housing growth in Washington Union, relatively few SUSHD students live in the newer homes. We have the addresses of housing units for which developer fees were paid between July 2000 and February 2007. A total of 86 homes were built in Washington Union, and in fall 2007, only nine SUHSD students lived in those units (Table 6). Thus, housing construction in this feeder has had little impact on SUHSD enrollments, both because there are no large developments and because high school student yields from new homes there are low.

Table 6

Feeder	Housing Type	Number of Units	Number of Students		Student Yield	
			7th and 8th graders	9th-12th graders	7th and 8th graders	9th-12th graders
Alisal	MFU	265	21	60	0.08	0.23
	SFU	1,265	169	371	0.13	0.29
	Total	1,530	190	431	0.12	0.28
Salinas City	MFU	13	3	8	0.23	0.62
	SFU	66	9	20	0.14	0.30
	Total	79	12	28	0.15	0.35
Santa Rita	SFU	354	5	102		0.29
	MFU	0				
	Total	354	5	102		0.29
Spreckels	SFU	66	0	11		0.17
	MFU	0				
	Total	66	0	11		0.17
Washington Union	SFU	86	0	9		0.10
	MFU	0				
	Total	86	0	9		0.10

Chart 24 shows WUSD kindergarten enrollments. As with K-8 enrollments, kindergarten enrollments have been fairly stable over time.

40

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

L-15

Chart 24

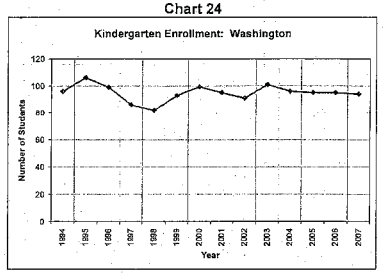


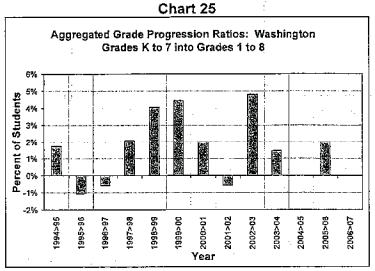
Chart 25 shows the aggregated grade progressions for Washington Union. Students in kindergarten through seventh grade are compared with students first through eighth grades the following year. These ratios measure the percentage change in cohort size as students progressed to the next grade. Grade progressions are usually most affected by migration into or out of the district and by transfers between public and private schools. The aggregated grade progressions show a net gain of students in the elementary grades. However, in the most recent year, the grade progression was close to zero, meaning that the same number of students left as entered Washington Union between fall 2006 and fall 2007.

We used a standard cohort survival method for forecasting enrollments in Washington Union. The key assumption concerns the set of grade progressions used in the forecast, and we used the average grade progressions for the entire 13-year period.

41

L-15

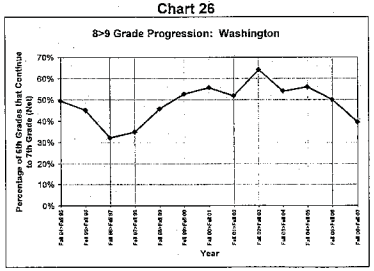
Chart 25



Note that the historical grade progressions include the effects of housing growth; therefore, some new housing is assumed the forecast model. Since some new housing was built in the last three years, the model implicitly assumes this will continue.

Chart 26 shows the eighth-to-ninth grade progression over time. This compares students in Washington Union's eighth grade class with the following year's SUHSD ninth graders living in the Washington feeder district. The rate has varied widely, between about 30 and 60 percent. The overall average grade progression is 49 percent, and we use this in the forecast model.

Chart 26



42

L-15

Total Forecast of SUHSD Students Living in WUSD

Unlike Alisal and Santa Rita, we forecasted SUHSD students living in the Washington Union district without separating students into new and older housing categories. Washington Union enrollments have little impact on SUHSD enrollments, and the effect of new housing on SUHSD enrollments has been minimal.

Table 7 shows the enrollment forecast for Washington Union. As mentioned above, the forecast model uses the average grade progressions of the history. The forecast indicates that SUHSD enrollments from this area will remain fairly constant or decline slightly.

Table 7

Washington Union Feeder Area Forecast, Using Grade Progression Ratios

GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
K	94									
1	96	98								
2	100	99	101							
3	105	102	101	103						
4	112	110	107	106	108					
5	113	116	115	111	110	113				
6	116	116	119	117	114	112	115			
7	108	113	112	116	114	110	109	112		
8	115	104	108	108	111	110	106	105	108	
9	41	56	50	53	52	54	53	51	51	52
10	55	40	54	49	51	51	52	51	50	49
11	69	53	39	53	47	49	49	51	50	48
12	51	62	48	35	47	43	45	45	46	45
9 to 12	216	211	191	189	198	197	199	198	197	195

Spreckels Union School District

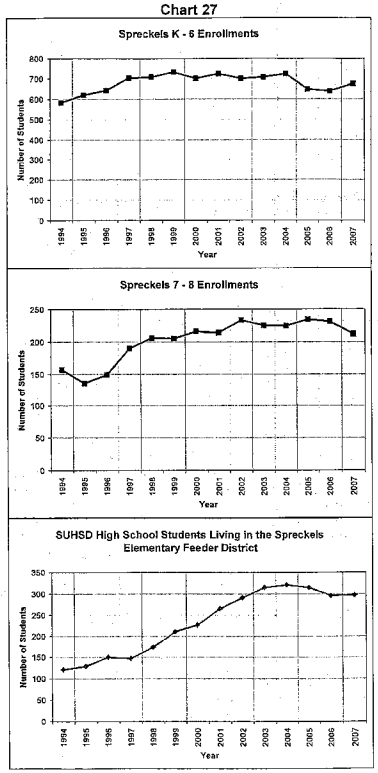
Chart 27 shows overall enrollments by school level for Spreckels Union School District. Since 1997, elementary and middle school enrollments have been quite stable. In contrast, the number of students from Spreckels that attend SUHSD more than doubled between 1997 and 2004: from 147 to 321 students. After 2004, enrollments declined. In fall 2007, 297 SUHSD high school students lived in Spreckels Union.

As in Santa Rita and Washington school districts, elementary enrollments were stable while high school enrollments increased. This suggests that the aggregated feeder enrollments may not be a good indicator of future high school enrollments. But, as with Washington, the numerical effect of Spreckels enrollments on SUHSD enrollments is small.

43

L-15

Chart 27



44

L-15

Although there has been housing growth in Spreckels Union, there are relatively few SUHSD students living in new homes. We have the addresses of housing units for which developer fees were paid between July 2000 and February 2007. A total of 66 homes were built in Spreckels Union, and in fall 2007, only 11 SUHSD students lived in them (Table 6). Thus, housing construction in this feeder area has had little impact on SUHSD enrollments, both because there are no large developments and because high school student yields from new homes are low.

Chart 28 shows kindergarten enrollments. As with K-8 enrollments, kindergarten enrollments have annual fluctuations (between 80 and 100 students), but the underlying trend seems stable.

Chart 28

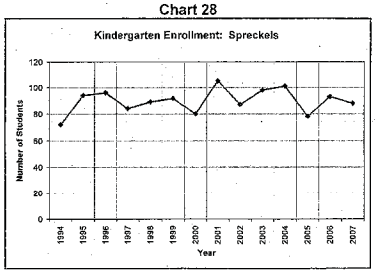


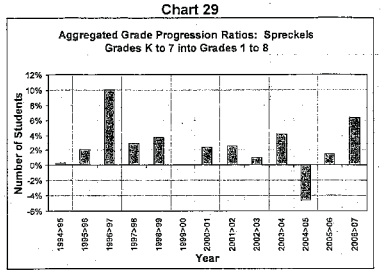
Chart 29 shows the aggregated grade progressions for Spreckels Union Elementary. The number of students in kindergarten through seventh grades is compared with the number of students in first through eighth grades the following year. These ratios measure the percentage change in cohort size as students progressed to the next grade. The grade progressions are usually most affected by migration into or out of the District and by transfers between public and private schools. The aggregated grade progressions show a net increase of students in the elementary grades.

We used a standard cohort survival method for forecasting enrollments in Spreckels Union. The set of grade progressions used in the forecast model is the key assumption needed in the forecast. We used the average grade progressions of the last 13 years.

45

L-15

Chart 29

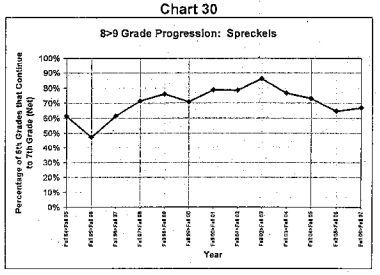


Note that the historical grade progressions include the effects of housing growth; therefore, some new housing assumed in the forecast model.

Chart 30 shows the eighth-to-ninth grade progression over time. This grade progression compares students in Spreckels' eighth grade class with SUHSD ninth graders living in the Spreckels district. The percentage has changed a lot over time and is at least partly responsible for the shift in high school enrollments. In the mid-1990s, the percentage of Spreckels eighth graders entering SUHSD as ninth graders was similar to Washington Union's, at about 50 percent. During the late 1990s through 2003, the percentage grew and reached 87 percent. This change corresponds to the increase in high school students from the area. During the last four years, however, the rate dropped. In the most recent year, the eighth-to-ninth grade progression was 68 percent. The entire 13-year average is 70 percent, which is used in the forecast model.

L-15

Chart 30



Forecast of SUHSD Students Living in SUSD

We use a standard cohort survival model for forecasting SUHSD enrollments from Spreckels Union. We started with Spreckels Union students by grade, aged each cohort, and applied the 13-year average grade progression rates. Table 8 shows the resulting enrollment forecast. Enrollments may rise slightly, but otherwise are quite stable.

Table 8

Spreckels Feeder Area Forecast, Using Grade Progression Ratios

GRADE	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
K	93	88									
1	83	108	95								
2	98	80	109	96							
3	92	107	83	113	100						
4	88	87	108	84	114	101					
5	86	92	89	110	86	117	103				
6	99	114	97	94	116	90	123	108			
7	113	101	116	99	95	118	92	125	110		
8	118	111	99	114	97	94	116	90	123	108	
9	75	79	78	70	80	68	66	82	63	86	76
10	71	76	76	75	67	77	65	63	78	61	83
11	86	66	69	69	69	61	70	60	58	72	56
12	64	76	62	65	65	64	57	66	56	54	67
9 to 12	296	297	285	279	281	271	259	271	256	273	282

L-15

SUHSD Forecast for All Feeder Areas Combined Outside the FGAs and West Boronda

Without housing construction in the Future Growth Areas (FGAs), West Boronda, and Rancho San Juan, the combined forecast for SUHSD shows about a 150-student increase in middle school enrollments by 2016, while high school enrollments show a decline of almost 270.

Table 9 shows the enrollment forecast for all of SUHSD, excluding the major developments.

Table 9 Forecast Excluding Major Developments

Middle School Enrollments										
	Actual	Forecast								
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Salinas City	**1,938**	1,942	1,941	1,923	1,866	1,843	1,903	1,967	1,989	1,989
Alisal	**1,967**	1,961	1,932	1,941	1,953	2,022	2,077	2,069	2,069	2,069
Inter-District Transfer	**92**	92	92	92	92	92	92	92	92	92
Total	**3,997**	3,995	3,965	3,956	3,911	3,958	4,072	4,128	4,150	4,150
High School Enrollments										
	Actual	Forecast								
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Salinas City	**3,997**	3,924	3,807	3,775	3,723	3,697	3,627	3,586	3,589	3,630
Alisal	**3,691**	3,648	3,678	3,672	3,624	3,633	3,622	3,680	3,727	3,779
Santa Rita	**1,241**	1,274	1,293	1,273	1,286	1,286	1,286	1,286	1,286	1,286
Washington	**216**	211	191	189	198	197	199	198	197	195
Spreckels	**297**	285	279	281	271	259	271	256	273	282
Graves	**4**	4	4	4	4	4	4	4	4	4
Lagunita	**6**	7	8	5	7	6	6	8	7	7
Inter-District Transfer	**104**	104	104	104	104	104	104	104	104	104
Total	**9,556**	9,458	9,364	9,302	9,216	9,186	9,119	9,123	9,187	9,287

Forecast of Enrollments from FGAs and West Boronda

We understand that the Future Growth Areas (FGAs) will contain 11,500 housing units, and the timing of construction is uncertain. Shown below are three different scenarios for the timing of these developments:

1 The most optimistic scenario assumes that occupancy begins in 2011 and the project takes 10 years to complete. This timeframe implies 1,150 units built per year, much greater than the historical rate in Salinas.

2 The Medium scenario assumes occupancy begins in 2015 and takes 15 years to complete.

L-15

3 The most pessimistic scenario assumes that the housing is built beyond our forecast period.

The West Boronda development, slated for 600 units, is farther along and its timing seems more certain. Occupancy is expected to begin in 2011, and will take approximately 10 years to complete.[13]

Table 10 includes students from the West Boronda development as well as the various scenarios for the FGAs. (The pessimistic forecast assumes no development and hence no enrollments from any new major development.) In both the optimistic and Medium forecasts, 3,025 high school students result, along with 1,033 middle school students, but in the optimistic forecast the results are reached in 2020, ten years before the Medium forecast enrollment total reaches this level.

The forecast assumes a student yield of .25 for high school students and .125 for middle school students. Also, it is assumed that about two-thirds of students living in the FGAs will live within the Alisal Union School District, and thus will have some impact on the middle school enrollments.

[13] According to Jerry Hernandez, Monterey County Housing and Redevelopment Office.

L-15

Table 10

Forecasts for the Future Growth Areas And Boronda

Optimisitic Forecast for Future Growth Areas

Year	# Units Built in FGAs	# Units Built in Boronda	Annual High School Enrollment	Cumulative Enrollment	Annual Middle School Enrollments	Cumulative middle school enrollments
2011	1150	60	303	303	103	103
2012	1150	60	303	605	103	207
2013	1150	60	303	908	103	310
2014	1150	60	303	1210	103	413
2015	1150	60	303	1513	103	517
2016	1150	60	303	1815	103	620
2017	1150	60	303	2118	103	723
2018	1150	60	303	2420	103	827
2019	1150	60	303	2723	103	930
2020	1150	60	303	3025	103	1033

Medium Forecast for Future Growth Areas

Year	# Units Built in FGAs	# Units Built in Boronda	Annual High School Enrollment	Cumulative Enrollment	Annual Middle School Enrollments	Cumulative middle school enrollments
2011		60	15	15	8	8
2012		60	15	30	8	15
2013		60	15	45	8	23
2014		60	15	60	8	30
2015	767	60	207	267	71	101
2016	767	60	207	473	71	173
2017	767	60	207	680	71	244
2018	767	60	207	887	71	316
2019	767	60	207	1093	71	387
2020	767	60	207	1300	71	458
2021	767		192	1492	64	522
2022	767		192	1683	64	586
2023	767		192	1875	64	650
2024	767		192	2067	64	714
2025	767		192	2258	64	778
2026	767		192	2450	64	842
2027	767		192	2642	64	906
2028	767		192	2833	64	969
2029	767		192	3025	64	1033

Combined Forecast

In this section, we combine the forecast from the FGAs with the forecast outside the FGAs. For the areas outside the FGAs, our forecast extends only through 2016. We use 2016 enrollment numbers for years after 2016. Table 11 shows the combined forecast. If the FGAs are developed, middle school enrollments eventually (by 2020 in the optimistic

50

L-15

forecast) reach 5,184 students, while high school enrollments eventually reach 12,312 students.

Note that the pessimistic scenario assumes no development in the FGAs and the forecasts are the same as shown in Table 9.

51

L-15

Table 11
Combined Enrollment Forecast for SUHSD

Optimistic Forecast

Middle School Enrollments

	Actual																								
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Non-FGA Areas	3,997	3,985	3,964	3,965	3,966	4,014	4,164	4,542	4,687	4,770	4,874	4,977	5,080	5,184	5,184	5,184	5,184	5,184	5,184	5,184	5,184	5,184	5,184
FGA and Boronda	0	0	0	0	103	207	310	413	517	620	723	827	930	1,033	1,033	1,033	1,033	1,033	1,033	1,033	1,033	1,033	1,033
Total	3,997	3,985	3,964	3,965	4,069	4,221	4,474	4,955	5,204	5,390	5,597	5,804	6,010	6,217	6,217	6,217	6,217	6,217	6,217	6,217	6,217	6,217	6,217

High School Enrollments

	Actual																								
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Non-FGA Areas	5,668	9,458	9,364	9,302	9,216	9,186	9,119	9,123	9,187	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287
FGA and Boronda	0	0	0	0	0	0	0	0	0	101	173	244	316	387	458	529	600	671	742	813	884	955	1,026
Total	5,668	9,458	9,364	9,302	9,216	9,186	9,119	9,123	9,187	9,388	9,460	9,531	9,603	9,674	9,745	9,816	9,887	9,958	10,029	10,100	10,171	10,242	10,313

Medium Forecast

Middle School Enrollments

	Actual																								
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Non-FGA Areas	3,997	3,985	3,965	3,966	3,911	3,968	4,072	4,128	4,152	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160
FGA and Boronda	0	0	0	0	0	0	0	0	0	101	173	244	316	387	458	529	600	671	742	813	884	955	1,026
Total	3,997	3,985	3,965	3,966	3,911	3,968	4,072	4,128	4,252	4,323	4,395	4,466	4,537	4,608	4,673	4,738	4,800	4,864	4,928	4,992	5,056	5,120	5,184

High School Enrollments

	Actual																								
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Non-FGA Areas	5,668	9,458	9,364	9,302	9,216	9,186	9,119	9,123	9,187	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287
FGA and Boronda	0	0	0	0	0	0	0	0	0	101	173	244	316	387	458	529	600	671	742	813	884	955	1,026
Total	5,668	9,458	9,364	9,302	9,216	9,186	9,119	9,123	9,187	9,388	9,460	9,531	9,603	9,674	9,745	9,816	9,887	9,958	10,029	10,100	10,171	10,242	10,313

Pessimistic Forecast

Middle School Enrollments

	Actual																								
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Non-FGA Areas	3,997	3,985	3,965	3,966	3,911	3,968	4,072	4,128	4,152	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160
FGA and Boronda	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	3,997	3,985	3,965	3,966	3,911	3,968	4,072	4,128	4,152	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160	4,160

High School Enrollments

	Actual																								
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Non-FGA Areas	5,668	9,458	9,364	9,302	9,216	9,186	9,119	9,123	9,187	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287
FGA and Boronda	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	5,668	9,458	9,364	9,302	9,216	9,186	9,119	9,123	9,187	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287	9,287

52

L-16

TAMC
TRANSPORTATION AGENCY FOR MONTEREY COUNTY

Regional Transportation Planning Agency • Congestion Management Planning
Local Transportation Commission • Monterey County Service Authority for Freeways & Expressways

October 27, 2008

Ms. Alana Knaster
Planning Manager
County of Monterey
Government Center
168 West Alisal Street, 2nd Floor
Salinas, California93901

SUBJECT: Comments on the Draft Environmental Impact Report for the County of Monterey 2007 General Plan Update

Dear Ms. Knaster:

The Transportation Agency for Monterey County is the Regional Transportation Planning Agency and Congestion Management Agency for Monterey County. Transportation Agency staff has reviewed the proposed Draft Environmental Impact Report for the County of Monterey 2007 General Plan Update. 1

The proposed project consists of a comprehensive update of the existing 1982 County General Plan and will establish the general pattern of land use and adopted goals and policies to guide the County in future land use decision-making, including, but not limited to, setting a development pattern centered on cities, Community Areas, and Rural Centers; providing infrastructure to serve new development concurrently with that development; and conserving sensitive natural areas.

Transportation Agency staff appreciates the County's coordination and discussion of this document early in the process and offers the following comments for your consideration:

Analysis Scenarios
Cumulative Conditions

- The draft report indicates that the transportation network analyzed under analysis scenarios Cumulative 2030, Cumulative 2030 Prior Land Use, and Cumulative Buildout includes seventeen proposed improvements to the roadway network that are set to receive funding from our agency's regional development impact fee program. Please note that full funding and construction of these projects by 2030 is dependent on funding in addition to the partial funding provided by the fee program. The passage of the proposed Measure Z initiative by the voters of Monterey County together with State and Federal funds would complete the funding for the majority of 2

55-B Plaza Circle, Salinas, CA 93901-2902 • Tel: (831) 775-0903 • Fax: (831) 775-0897 • Website: www.tamcmonterey.org

L-16

the projects. Absent this additional source of local transportation funding, which would also be used to secure State and federal matching funds, the project delivery schedule for some of these improvements, such as the Highway 156 – U.S. 101 interchange project, would need to be pushed out beyond 2030. Ultimately, if this were to occur, the roadway network assumed in the cumulative analysis scenarios may not be fully completed until after the Year 2030, if at all, which would result in some of the studied segments and intersections to experience lower Level of Service standards than depicted in the report. 2

Impacts TRAN-1A, 2A, 3A, & 4A
Project-Specific Impacts

- With exceptions for some community areas, the Transportation Agency supports the use of Level of Service standard D, a measurement of roadway volume-to-capacity, as the threshold for impact mitigation from new development. This standard level is a cost effective method for gauging the scope of needed roadway improvements and also helps to encourage the use of alternative forms of transportation, such as transit, carpooling, and bicycle travel.

- As a means of providing mitigation for project-specific impacts from new development to meet the Level of Service D threshold, the Transportation Agency supports fair-share contributions towards identified improvements or for the project applicant to construct the improvement concurrently with the proposed development. 3

- The Transportation Agency also supports the policies related to the requirement of new development to design public facilities to accommodate pedestrians, bicycles, and transit as a means of reducing the impacts from vehicle traffic. Please see enclosed for our agency's *Principles for Community Development* for recommendations on implementing these policies and accommodating alternative transportation in new development. Further discussion of alternative transportation is provided under our agency's comments to draft report sections TRAN-1F through 5F (Alternative Transportation).

Impacts TRAN-1B, 2B, 3B, & 4B
County & Regional Roadway Impacts

- Page 4.6-45 of the draft report notes that: *The County and the Transportation Agency are planning to implement Traffic Impact Fees to fund improvement projects, but the amount of the fees are limited for affordability and total fee burden reasons.*

  The Transportation Agency's Regional Development Impact Fee program has been adopted by all the cities plus the County Board of Supervisors and went into effect on August 27, 2008. The amount of the regional fees are not limited for affordability or based on the burden that the cost of mitigation places on development, but are dictated by the cost of the improvement projects that the program funds and the amount of vehicle trips generated by new development that is forecasted in the County. In the event that a specific development type generates fewer trips than is assumed in the fee program, such as with affordable housing, the amount of the fees 4

L-16

can be reduced to more accurately reflect the development's level of impacts. In this manner, each new development will contribute its proportionate share in fees towards the improvement project costs, fully mitigating its cumulative transportation impacts under the California Environmental Quality Act.

- The Transportation Agency supports and appreciates the County's commitment to work with our agency and other local jurisdictions to improve congestion through the coordination of regional and countywide traffic impact fees and the development of the Regional Transportation Plan. Our agency is currently in the process of developing an update to the Regional Transportation Plan in coordination with the Association of Monterey Bay Area Governments, the Santa Cruz County Regional Transportation Commission, and the San Benito Council of Governments. As our agency progresses on the updated plan, we will work collaboratively with the local agencies and seek input from County staff.

- Our agency also supports that County requires impacts to regional transportation facilities to be mitigated through the Regional Development Impact Fee program. Participation by County staff in stakeholder meetings during the development of the regional fee program was helpful in shaping a comprehensive and equitable program, and the County's continued support in mitigating cumulative impacts through the regional fee program is appreciated. 4

- Area Plan Policies for the North County and Greater Salinas areas make note of a bypass of Highway 101 north of Salinas being provided to provide additional highway capacity and improve access. The Prunedale Bypass project, as these policies seem to describe, is not likely to be constructed by the Year 2030 cumulative analysis scope and should not be included as part of the analyzed transportation network. To address issues of capacity and access in the North County and Greater Salinas areas, our agency is proposing the construction of the Westside Bypass from Boronda Road to Davis Road, the Eastside Connector from an upgraded Harris Road interchange to Williams Road, widening Highway 156, and frontage roads along Highway 101 from south Salinas to Soledad.

Impacts TRAN-1F, 2F, 3F, & 4F
Alternative Transportation

- Page 4.6-53 of the draft report states that: *Bicycling, walking, and transit are less attractive alternatives to the automobile when greater distances are involved. Further, lower density development spread over a larger is effective to serve by transit than higher density, mixed-use communities.*

  While increases in travel distances tend to result in the selection of automobiles over alternative modes of transportation, higher density and mixed-use communities are better suited to service with transit and attract bicycle and pedestrian trips over lower density development. This statement should be revised to reflect the positive impact that high density development has on encouraging the use of alternative modes of transportation. 5

L-16

- The Transportation Agency supports accommodation of alternative forms of transportation (rail, bus transit, bicycle and pedestrian transportation), both through the design of transportation facilities, and through the design and orientation of land uses. As such, our agency supports the County's proposed policies to encourage alternative modes of travel by providing increased transit service, pedestrian and bicycle infrastructure, compact and mixed-use development, requirements for site designs that support transportation choice, and ensuring that new developments provide multimodal facilities.

- The draft report notes that, where appropriate and sufficient right-of-way is available, that bicycle paths shall be separated from major roads and highways. Our agency also encourages and recommends the inclusion of on-street bike lanes in the construction of new major arterials and collectors with an average daily traffic greater than 3,000 or with a speed limit in excess of 30 miles per hour, to reduce vehicle-bicycle conflicts at intersection crossings and improve safety for bicyclists making turning movements through intersections.

- The draft report should address the need for new roadways on the interior of developments to be designed to accommodate bicycles with adequate pavement for bike travel, with specific dimensions clearly identified, particularly along major arterials.

- A premium should be placed on safe and accessible pedestrian access to development sites from intersections and crosswalks, sidewalks, and bicycle facilities. Our agency recommends that the draft report address issues of pedestrian travel, access, and safety. Our agency supports proper striping requirements at all pedestrian crosswalks to clearly identify areas of pedestrian travel and ensure safe transitions for vehicles and pedestrians. Consideration in the draft report should also be given to supporting the inclusion of intelligent crosswalks, which provide flashing notification lights when a pedestrian enters the crosswalk to increase visibility and alert drivers of their presence. New developments should be required to be designed with American Disability Act-compliant sidewalks that connect to external facilities, provide access to transit stops, and to not include the use of cul-de-sacs without a cut-through for pedestrian travel.

- In addition, The Transportation Agency recommends that implementation of bicycle facility-related policies encourage new developments to install public bicycle racks and lockers. Adequate lighting at these locations to improve safety and visibility should be provided by the development. The Transportation Agency encourages project developers to apply for our Bicycle Protection Program, which provides grant funding for bicycle parking facilities (racks and lockers) for local businesses, governments, and school districts.

- Our agency supports the concentration of new development along major transportation corridors and near incorporated cities to make transit services more feasible. The draft report should also indicate a preference for working early in the development process with Monterey-Salinas Transit to ensure that transit access and facilities are properly planned and provided. New development should also be

5

L-16

required to utilize Monterey-Salinas Transit's *Designing for Transit* Guideline Manual as a resource for accommodating transit service at new development sites.

5

Alternatives to the 2007 General Plan
Transit-Oriented Development Alternative

- As previously noted, the Transportation Agency supports the efforts presented in the 2007 General Plan to increase the use of public transportation and enhance Monterey-Salinas Transit's areas of operations and infrastructure. In addition to this, the proposed Transit-Oriented Development alternative is consistent with our agency's plans to encourage and support a combination of increased fixed-route bus service, commuter and passenger rail, express bus services, and bus rapid transit. Implementation of this alternative, with designated Transit-Oriented Development nodes located in Castroville, Pajaro, former Fort Ord, and the Route 68 corridor, may require our agency to modify the initial planning and funding assumptions for some of the regional transportation improvement projects in the regional fee and *Investment Plan* programs. Our agency requests that if this alternative is selected that the County work collaboratively with our agency to ensure consistency of implementation with our plans and programs for the regional transportation network.

6

Climate Change
Land Use and Circulation

- The draft report describes how development and other activities associated with 2007 General Plan would contribute to global climate change. The Transportation Agency supports the policies identified in the 2007 General Plan for land use, circulation, and open space conservation to help reduce greenhouse gas emissions. Related to the polices outlined in the draft report, Senate Bill 375 (Transportation, Land Use, and the California Environmental Quality Act) provides a path for better planning by providing incentives for locating new developments in a manner that reduces vehicle miles traveled. The bill requires the regional governing bodies in each of the state's major metropolitan areas to adopt, as part of their regional transportation plan, a "sustainable community strategy" that will meet the region's target for reducing greenhouse gas emissions. Our agency encourages the County to coordinate its efforts and policies that address climate change with the Association of Monterey Bay Area Governments and its currently underway Blueprint Planning process, which is the basis for the Monterey County "sustainable community strategy"

7

Thank you for the opportunity to review this document. If you have any questions, please contact Michael Zeller of my staff at (831) 775-0903.

Sincerely,

Debra L. Hale
Executive Director

CC: Dave Murray, California Department of Transportation (Caltrans) District 5
Paul Greenway, Monterey County Department of Public Works

L-16

Carl Sedoryk, Monterey-Salinas Transit
Nicholas Papadakis, AMBAG
Ed Kendig, Monterey Bay Unified Air Pollution Control District

Enclosures: Transportation-Related Principles for Community Development
Alternative Measures

L-16

Transportation Agency for Monterey County
Transportation-Related Principles for Community Development

Mission

The Transportation Agency for Monterey County aims to develop and maintain a multi-modal transportation system that enhances the mobility, safety, access, environmental quality, and economic activities in Monterey County.

The purpose of the following set of principles is to reduce future impacts to Monterey County's regional transportation system, reduce the cost of transportation infrastructure, and improve the Transportation Agency's ability to meet Monterey County's regional transportation needs. Our agency recommends that new land use development in the county adhere to the following set of principles, which emphasize developing a land use pattern that is supportive of non-single occupant auto modes of transportation so as to maximize the carrying-capacity of Monterey County's existing regional transportation infrastructure.

1. Land Use

- **1.a** Encourage mixed use developments to accommodate short trips by non-auto modes
- **1.b** Encourage growth in areas where transportation infrastructure exists or is most cost-effective to extend
- **1.c** Encourage a balance of employment and housing to reduce regional commute demands
- **1.d** Encourage higher residential densities in core areas or around transit stops to support regular transit service throughout the region
- **1.e** Encourage land use jurisdictions to utilize the Caltrans Traffic Impact Studies Guide or develop traffic impact study guidelines of their own when analyzing the impacts of growth on the regional transportation system
- **1.f** Require new development to pay for its proportional impact to the transportation system, preferably via regional and local fee programs, or on-street project construction

2. Street Network Design

- **2.a** Provide an interconnected street system for new development to facilitate short trips by non-auto modes of transportation using the following features:
  - **2.a.1** Provide a grid-based street network.
  - **2.a.2** Encourage short block lengths in new development
  - **2.a.3** Discourage cul-de-sac streets in new development unless they incorporate pedestrian and bike easements that reduce trip lengths
- **2.b** Incorporate traffic calming features into the street network to slow the flow of traffic and enhance the pedestrian environment:
  - **2.b.1** Provide curb bulb-outs at intersections to reduce the length of pedestrian crossings
  - **2.b.2** Allow on street parking to slow the flow of cars and create pedestrian/auto buffer
  - **2.b.3** Provide landscaped buffers between pedestrians and motorized traffic and provide pedestrian-scale street lighting no more than 15 feet high

- 2.c Design streets to accommodate all modes of transportation
  - **2.c.1** Incorporate sidewalks and bicycle lanes into new street construction
  - **2.c.2** Accommodate safe bicycle travel by providing on-street bicycle lanes and routes instead of separated bicycle paths
  - **2.c.3** Incorporate bus pullouts, transit stops, transit shelters and other transit amenities to serve new development according to the MST Designing for Transit Handbook

3. Site Design

- 3.a Orient buildings to face the street in new development to improve access for pedestrians from sidewalks
- 3.b Incorporate residential uses over commercial uses in commercial areas to encourage trips by foot, bike, or transit and improve access by each of these modes
- 3.b Incorporate reduced building setbacks, especially in commercial areas, to reduce the length of pedestrian trips and facilitate easy access
- 3.c Locate on-site parking to the rear of structures or underground
- 3.d Provide pedestrian facilities connecting building entrances with the street where parking is not provided to the rear of structures to enhance pedestrian access and safety
- 3.f Incorporate bicycle storage facilities into site plans to accommodate access by bicyclists

4. Transportation Demand Management

- 4.a Encourage telecommuting in non-residential development as a traffic mitigation measure
- 4.b Encourage flexible work schedules for employees as a traffic mitigation measure
- 4.c Encourage employers to utilize available rideshare programs or create their own
- 4.d Encourage employers to offer transit incentives to employees to mitigate traffic impacts
- 4.e Provide preferential carpool or vanpool parking in non-residential developments
- 4.e Encourage large employers to offer child care facilities as resources allow and encourage all employers to provide information on nearby child care resources
- 4.f Locate child care facilities near employment centers

SAMPLES OF ALTERNATIVE MEASURES

1. Provide ridesharing, public transportation and nearby licensed child care facility information to tenants/buyers as part of move-in materials.
2. Print transit information on promotional materials.
3. Install bicycle amenities, such as bicycle racks and bicycle lanes.
4. Provide bus pullouts, pedestrian access, transit stops, shelters and amenities as part of the site plan.
5. Provide locked and secure transportation information centers or kiosks with bus route/schedule information, in common areas.
6. Provide pedestrian facilities linking transit stops and common areas.
7. Provide resources for site amenities that reduce vehicular trip making.
8. Park-and-ride facilities.
9. On-site childcare facilities.
10. Shuttle bus service, bus pools or improved transit service as part of the development.
11. Facilities to encourage telecommuting.
12. Pedestrian and bicycle system improvements.
13. Transit oriented design and/or pedestrian oriented design.
14. Provide preferential carpool/vanpool parking spaces.
15. Implement a parking surcharge for single occupant vehicles.
16. Provide shower/locker facilities.
17. Employ or appoint a transportation/rideshare coordinator.
18. Implement a rideshare program.
19. Provide incentives for employees to rideshare or take public transportation.
20. Implement compressed work schedules.

L-16

Samples of Alternative Measures *Attachment 2*

SAMPLES OF STREET AND ROAD IMPROVEMENTS

1. Safety improvements
2. Traffic signal improvements.
3. Traffic signals.
4. Turning or auxiliary lanes.
5. Add travel lanes.
6. Improve highway interchange.
7. Construct interchange.
8. Construct new street or road.

Page 2

County of Monterey Resource Management
Agency, Planning Department

Comment Letters
Local Agencies

This page intentionally left blank.