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OCT 28 2008

RECEIVED

October 24, 2008
 Mr. Carl Holm. AICP
 Monterey County Planning Dept.
 168 W. Alisal St., 2nd floor
 Salinas, CA 93901

Re: Correction of my 10/23/08 letter

Dear Mr. Holm:

This is a copy of the e-mail I sent you today to correct a mistake in the letter I sent you yesterday regarding mistakes in the DEIR for GPU-5 and also to offer examples that might help the planning staff to understand my concerns.

The mistake appears on page 3 of yesterday's letter where I speak of the post-2006 trend in the loss of Monterey County prime farmland. It should say the post-2004 trend, not the post-2006 trend.

The three attachments to this letter should be viewed side-by-side to see the critical information I found after I tracked down correct reference #35 in DEIR Section 11.

- Attachment #1 is page 4.2-6 of the DEIR containing Tables 4.2-5 and 4.2-6. The DEIR tables show the trend in loss of Monterey County prime farmland with only three reference points: 1984, 1994, and 2006. The rate of post-2004 loss cannot be determined.
- Attachment #2 is from the (corrected) reference #35 website. It breaks down Monterey County farmland conversion from 1984 to 2006 into eleven two-year intervals and states that the average annual acreage change over that 22-year period is 416 acres per year.
- Attachment #3 is also from the reference #35 website. It states that the total acreage of Monterey County prime farmland from 2004 to 2006 was 2,711 acres, which would be a post-2004 acreage change during those two years of 1,355 acres.

In other words, the post-2004 average annual acreage loss of Monterey County prime farmland is *three times* greater than the average annual loss in the preceding twenty years. This trend is not disclosed in either GPU-5 nor in the DEIR. I learned of it only because I spent several hours tracking down the correct reference for Section 11 #35.

I will mail you a hard copy of this letter and the attachments.

Yours truly,

Jane Haines

Table 4.2-5. Agricultural Land Use Summary

Land Use Category	Acres			Percent Change 1984–2006 (%)
	1984	1994	2006	
Prime Farmland	176,779	174,681	167,636	-5.2
Farmland of Statewide Importance	37,762	37,961	43,402	+14.9
Unique Farmland	10,875	13,074	25,104	+131.0
Important Farmland subtotal	225,416	225,716	236,142	+4.6
Grazing Land	1,081,510	1,080,452	1,065,577	-1.5
Agricultural Land subtotal	1,306,926	1,306,168	1,301,719	-0.04
Urban Land	42,374	47,112	55,951	+32.0
Other	765,284	761,302	757,210	-1.1
Water	6,544	6,545	6,246	-4.6
Total Land	2,121,128	2,121,128	2,121,128	

Sources: California Department of Conservation. Farmland Mapping and Monitoring Program. *Monterey County Historic Land Use Conversion. 1982 to Present*. Accessed: http://redirect.conservation.ca.gov/DLRP/fmmp/pubs/1984-Present/mnt_1984-Present.xls.

California Department of Conservation. Farmland Mapping and Monitoring Program. *Monterey County Important Farmland Data Availability. Land Use Conversion Table 2004–2006*. This table is available online through the Farmland Mapping and Monitoring Program: http://redirect.conservation.ca.gov/DLRP/fmmp/county_info_results.asp.

As a percentage of total land in Monterey County, agricultural uses have held constant at more than 61% for the past 20 years. While several thousand acres of agricultural land were converted to urban uses during that period, land continues to be brought into production, and, as of 2006, urban uses represent less than 3% of total land use in Monterey County. Table 4.2-6 summarizes land use as a percentage of the total area of Monterey County.

Table 4.2-6. Land Use as a Percentage of Monterey County Area

Land Use	1984	1994	2006
Important Farmland	10.6	10.6	11.1
Grazing Land	51.0	50.9	50.2
Agricultural Land total	61.6	61.5	61.3
Urban Land	2.0	2.2	2.6

Source: California Department of Conservation. Farmland Mapping and Monitoring Program. *Monterey County Important Farmland Data Availability. 1984-2006 Land Use Summary*. Accessed: http://redirect.conservation.ca.gov/DLRP/fmmp/pubs/1984-Present/mnt_1984-Present.xls.

Attachment # 1

MONTEREY COUNTY
1984-2006 Land Use Summary
 Farmland Mapping and Monitoring Program
 CALIFORNIA DEPARTMENT OF CONSERVATION

LAND USE CATEGORY	TOTAL ACREAGE INVENTORIED													1984-2006 NET ACREAGE CHANGE	Average Annual Acreage Change
	1984	1986	1988	1990	1992	1994	1996	1998	2000 (2)	2002 (3)	2004	2006			
Piñe Farmland	176,779	176,892	176,738	176,356	175,448	174,681	173,238	170,774	169,255	169,338	169,369	167,636	-9,146	-416	
Farmland of Statewide Importance	37,762	37,678	37,905	37,297	37,396	37,961	38,209	38,714	45,877	44,998	44,546	43,402	5,640	256	
Unique Farmland	10,875	10,984	11,253	12,001	12,706	13,074	13,610	15,236	24,142	26,476	26,479	25,104	14,229	647	
Farmland of Local Importance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Important Farmland Subtotal	225,416	225,554	225,896	225,654	225,550	225,716	225,057	224,724	239,274	240,812	240,394	236,142	10,726	488	
Grazing Land	1,081,510	1,081,159	1,080,857	1,080,441	1,080,482	1,080,452	1,078,186	1,076,031	1,060,663	1,057,448	1,066,538	1,065,577	-15,933	-724	
Agricultural Land Subtotal	1,306,926	1,306,713	1,306,753	1,306,095	1,306,032	1,306,168	1,303,243	1,300,755	1,299,937	1,298,260	1,306,932	1,301,719	-5,207	-237	
Urban and Built-Up Land	42,374	43,197	43,880	45,253	46,370	47,112	49,231	50,030	52,486	54,060	54,291	55,951	13,577	617	
Other Land	765,284	764,671	763,947	763,233	762,178	761,302	762,274	764,098	762,459	762,559	753,657	757,210	-8,074	-367	
Water Area	6,544	6,547	6,547	6,547	6,547	6,545	6,379	6,245	6,246	6,246	6,246	6,246	-298	-14	
Total Area Inventoried	2,121,128	2,121,128	2,121,127	2,121,128	2,121,127	2,121,127	2,121,127	2,121,128	2,121,128	2,121,125	2,121,126	2,121,126	-2	-0	

(1) Figures are generated from the most current version of the GIS data. Files dating from 1984 through 1992 were reprocessed with a standardized county line in the Albers Equal Area projection, and (2) Due to the incorporation of digital soil survey data (SSURGO) in 2000, acreages for farmland, grazing and other land categories may differ from those published in the 1998-2000 Farmland C (3) Due to the incorporation of an updated digital soil survey data (SSURGO) during this update, acreages for farmland, grazing and other land use categories may differ from those published in t

PERCENTAGE OF COUNTY INVENTORIED: 100%

TABLE A-19
MONTEREY COUNTY
 2004-2006 Land Use Conversion

CALIFORNIA DEPARTMENT OF CONSERVATION
 Division of Land Resource Protection

Farmland Mapping and Monitoring Program

PART I
 County Summary and Change by Land Use Category

LAND USE CATEGORY	TOTAL ACREAGE INVENTORIED		2004-06 ACREAGE CHANGES				TOTAL ACREAGE 2006
	2004	2006	ACRES LOST (-)	ACRES GAINED (+)	TOTAL ACREAGE CHANGED	NET ACREAGE CHANGED	
Prime Farmland	169,369	167,636	2,711	978	3,689	-1,733	486
Farmland of Statewide Importance	44,546	43,402	1,585	441	2,026	-1,144	0
Unique Farmland	26,479	25,104	2,025	650	2,675	-1,375	31
Farmland of Local Importance	0	0	0	0	0	0	0
IMPORTANT FARMLAND SUBTOTAL	240,394	236,142	6,321	2,069	8,390	-4,252	517
Grazing Land	1,066,538	1,065,577	5,826	4,865	10,691	-961	12
AGRICULTURAL LAND SUBTOTAL	1,306,932	1,301,719	12,147	6,934	19,081	-5,213	529
Urban and Built-up Land	54,291	55,951	230	1,890	2,120	1,660	0
Other Land	753,657	757,210	2,295	5,848	8,143	3,553	383
Water Area	6,246	6,246	0	0	0	0	0
TOTAL AREA INVENTORIED	2,121,126	2,121,126	14,672	14,672	29,344	0	912

PART II
 Land Committed to Nonagricultural Use

LAND USE CATEGORY	Water Area	Other Land	Urban and Built-up Land	Total Agricultural Land	Total Converted To Another Use
Prime Farmland	0	706	211	1,794	2,711
Farmland of Statewide Importance	0	237	26	1,322	1,585
Unique Farmland	0	504	18	1,503	2,025
Farmland of Local Importance	0	0	0	0	0
IMPORTANT FARMLAND SUBTOTAL	0	1,447	255	4,619	6,321
Grazing Land	0	4,318	277	1,231	5,826
AGRICULTURAL LAND SUBTOTAL	0	5,765	532	5,850	12,147
Urban and Built-up Land	0	83	--	147	230
Other Land	0	--	1,358	937	2,295
Water Area	0	0	0	0	0
TOTAL ACREAGE REPORTED	0	5,848	1,890	6,934	14,672

PART III Land Use Conversion from 2004 to 2006

LAND USE CATEGORY	Prime Farmland	Farmland of Statewide Importance	Unique Farmland	Farmland of Local Importance	Subtotal Important Farmland	Grazing Land	Total Agricultural Land	Other Land	Water Area	Total Converted To Another Use
Prime Farmland (1)(2)	to: 161	21	84	0	266	4,353	4,619	1,447	0	6,321
Farmland of Statewide Importance (1)(2)	to: 634	202	395	0	1,231	--	1,231	4,318	0	5,826
Unique Farmland (1)(2)	to: 155	18	479	0	1,497	4,353	5,850	5,765	0	12,147
Farmland of Local Importance	to: 33	105	5	0	143	4	147	83	0	230
IMPORTANT FARMLAND SUBTOTAL	to: 150	113	166	0	429	508	937	--	0	2,295
Grazing Land (1)	to: 795	223	0	0	0	0	0	0	0	0
AGRICULTURAL LAND SUBTOTAL	to: 161	441	650	0	2,069	4,865	6,934	5,848	0	14,672
Urban and Built-up Land (4)										
Other Land										
Water Area										

(1) Conversion among irrigated agricultural categories is due to the incorporation of updated digital soil survey data (SSURGO) into the 2006 Important Farmland data. This reflects modifications made to soil mapping by the U.S. Department of Agriculture as opposed to land use conversions.
 (2) Conversion to Grazing Land primarily due to land left idle for three or more update cycles and the identification of nonirrigated crop production on land formerly mapped as irrigated farmland.
 (3) Conversion to Other Land primarily due to the addition of low-density housing throughout the county and the delineation of an approximately 1,500 acre oil field on the Wunpost quad.
 (4) Conversion from Urban and Built-up Land due to the delineation of a portion of the King City Sanitary Sewage Treatment Plant/Wastewater Treatment Facility as irrigated pasture; and due to the use of detailed digital imagery to delineate more distinct urban boundaries.

MONTEREY COUNTY