

JAN 26 2009

RECEIVED

JANE HAINES

601 OCEAN VIEW BOULEVARD APT. 1 PACIFIC GROVE, CALIFORNIA 93950

January 24, 2009

Mr. Carl Holm, Assistant Planning Director  
Monterey County Planning Dept.  
County of Monterey  
168 W. Alisal Street  
Salinas, CA 93901

Comments on the Draft Environmental Impact Report  
(DEIR) for General Plan Update 5 (GPU-5)

Dear Mr. Holm:

The cover of the DEIR suggests that a main objective of GPU-5 will be to protect Monterey County's prime farmland for the next twenty years. Despite the cover's appearance, the texts of GPU-5 and the DEIR obscure the reality that Monterey County has been rapidly losing prime farmland for the past twenty-five years, and that concurrent with the loss of prime farmland, Monterey County has been rapidly expanding acreage of lesser quality farmland. Moreover, GPU-5 proposes a program to mitigate for projected additional loss of farmland which fails to comply with CEQA's mandate for enforceable and measurable mitigation for specific environmental impacts. The Final EIR should distinguish the loss of prime farmland from the loss of lesser quality farmland and interpret the proposed mitigation program in such a way that it will comply with CEQA's requirement for specificity.

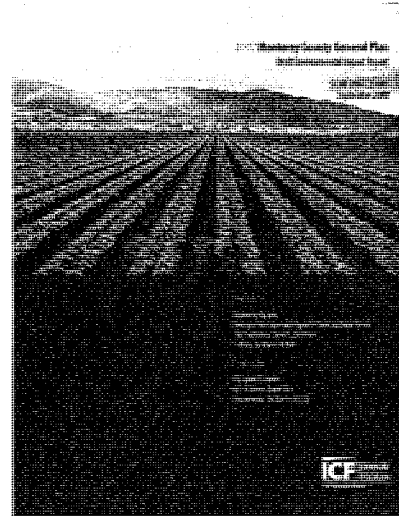


Table 4.2-5 of the DEIR shows that since 1984, Monterey County has suffered substantial losses of prime farmland concurrent with substantial gains of lesser quality farmland. Over nine thousand acres of prime farmland were converted to non-agricultural uses between 1984 and 2006. Table 4.2-5 also shows that acreage of the inferior "unique" farmland has increased in acreage by nearly fifteen thousand acres concurrent with the corresponding decrease in acreage of "prime" farmland.

"Prime" farmland is defined as "[l]and with the **best** combination of physical and chemical features able to sustain the long-term production of agricultural crops. These lands have the soil quality, growing season, and moisture supply needed to produce sustained high yields." (DEIR pg. 4.2-8 quoting the *California A Guide to the Farmland Mapping and Monitoring Program*, emphasis added.) By contrast, "unique" farmland is defined as "[l]and of **less quality** soils used for the production of the State's leading agricultural crops." (*Ibid*, emphasis added.)

The DEIR lumps together Prime farmland, Farmland of Statewide Importance, and Unique farmland and refers to them collectively as "Important Farmland." By using the collective term "Important Farmland," the DEIR advances the misleading notion that Monterey County has been gaining farmland rather than losing it. While it's true that Monterey County has gained 4.6% in Important Farmland during the past twenty-six years, that figure is derived by combining a 131% increase in acreage of Unique Farmland with the 5.2% loss in acreage of Prime farmland. As shown by their respective definitions, Prime farmland is environmentally superior to lesser quality farmland. Thus, the DEIR's failure to explicitly distinguish the types of farmlands which have been lost and which have been gained misleads the reader into uninformed complacency.

The relative value between prime and non-prime farmland should be specified in Policy AG-1.12. Policy AG-1.12 describes the mitigation program for loss of important Farmland in which ratios "may" be applied in requiring greater mitigation for loss of prime land than land of lesser agricultural value. It states:

The County shall prepare, adopt and implement a program that requires projects involving a change of land use designation resulting in the loss of important Farmland (as mapped by

1

2

Re: DEIR for GPU-5  
 January 24, 2009  
 Page 2

the California Department of Conservation Farmland Mapping and Monitoring Program) or involving land to be annexed to an incorporated area, in consultation with the cities to mitigate the loss of Important Farmland resulting from annexation, to mitigate the loss of that acreage. The program may include ratios, payment of fees, or some other mechanisms. Mitigation mechanisms established through this program shall be based upon a graduated value of the important Farmland, with mitigation for loss of prime land having the highest agricultural value." GPU-5, AG-1.12

To ensure that the mitigation for the loss of prime farmland discourages the loss of this irreplaceable resource, and to provide substantial incentive for converting Unique farmland rather than Prime farmland, the last two sentences of Policy AG-1.12 should specify a ratio for mitigation as follows: "The program ~~may shall~~ include ratios ~~and may~~ include payment of fees, or some other mechanisms. Mitigation mechanisms established through this program shall be based upon a graduated value of the Important Farmland, with mitigation for loss of prime land ~~having the highest agricultural value being approximately five times greater than mitigation for loss of Unique Farmland.~~" The DEIR should state that GPU-5, AG-1.12 shall be so interpreted.

2

The October 9, 2006 comments by Mr. Bunn on the 2006 Monterey County General Plan are well-placed. His letter states that "easements on Important Farmland have recently gone for as much as \$60,000 an acre. If that's the starting point, then affordable housing in the County is about to become even less affordable." Assuming the easements Mr. Bunn speaks of are on Prime farmland, placing the same easement on an acre of Unique Farmland would cost only one-fifth as much. The result would be to make conversion of Unique Farmland far more likely to occur in the future than the conversion of Prime Farmland. This type of specific and measurable incentive is required by CEQA.

In addition to recommending that GPU-5 be specific as to proportional mitigation requirements for loss of prime farmland as contrasted with mitigation for the loss of lesser quality farmland, I incorporate by reference my September 20, 2006 letter commenting on the DEIR for the 2006 Monterey County General Plan.

Thank you for correcting the errors in the maps and the text as they referred to the Chualar Community Area.

3

Yours truly,



Jane Haines