

City of Gonzales

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Monte rey County Planning and 58 Ulding Inspection Administration

JAN 0 8 2009

RECEIVED

January 5, 2009

Maria Orozco Mayor

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

Scott Funk Mayor Pro Tern

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

Man Gourley Councilmember

René L. Mendez City Manager 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.

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

Sincerely,

Maria G co, I' ayotJ



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

PolicyLIT-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 â 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.

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.

<u>PolicyLU-2.19</u> 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 '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

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deleted or revised to state that "The County will coordinate with the cities to evaluate development proposals 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".

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."

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.

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