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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

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.

- 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:

- 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

Calderon, Vanessa A. x5186

From: Maricruz Aguilar [maguilar@kingcity.com]
Sent: Monday, February 02, 2009 6:20 PM
To: ceqacomment
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