



*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, 2<sup>nd</sup> 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.

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.

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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.

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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.

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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.

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.

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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.”

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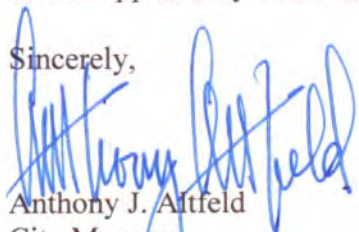
6. Draft EIR, Page 4.11-17, Significance Determination

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.**”

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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. Altfeld  
City Manager