



COUNTY OF SAN BENITO PLANNING & BUILDING INSPECTION SERVICES

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Carl Holm, Planning Manager
Monterey County Planning Department
168 W Alisal St., 2nd Floor
Salinas, CA 93901-2438

Subject: Comments regarding Monterey County's 2007 General Plan Update (5) DEIR

Dear Mr. Holm:

Thank you for the opportunity to review and comment on the 2007 Draft Environmental Impact Report for the Monterey County General Plan. Staff would like to express its support for the continued effort to complete this General Plan update. As a neighboring agency, San Benito County has a continued interest in this process. Decisions made within your jurisdictional boundaries may have significant effects on our County. Therefore, listed below are some comments submitted by staff in October of 2006, related to General Plan update number 4, and new concerns staff believes that the document should address in more detail. While past the official comment period, our Board will be reviewing this matter on November 4 and may also have some comments.

1

The County's previous comments regarding the 2006 General Plan update (update 4) Draft Environmental Impact Report, and subsequent comments follow.

- *We encourage Monterey County to work with San Benito County in improving locations along our shared border in areas such as near Gonzales, Soledad and King City in addition to the Aromas and Prunedale areas.*

2

Although this comment does not need to specifically be addressed in this EIR document, San Benito would like to emphasize the ongoing need for governmental cooperation when considering development projects or policies for development for which the effects would reach across County boundaries and potentially conflict with current San Benito County policies.

- *We are also interested in better coordinating public safety and transportation planning especially in those areas in particular along La Gloria Grade Road as some problems occur there from time to time.*

3

This comment relates directly to transportation corridor planning. Monterey County is in a unique position as it borders San Benito County, which has a number of recognized outdoor recreation areas. One area in particular, The Pinnacles, is working toward National Park status and as such may require increased attention from both San Benito and Monterey Counties in order to ensure access to the park is convenient, safe, and desirable.

- *We also would like to cooperate with you again in protection of the ridgeline areas that we share and in minimizing the impact of nighttime lighting in the rural areas.*

Land Use Element Policy LU-1.13 appears to appropriately address light and glare. Open Space and Conservation Element OS-1.12 appears to prohibit ridgeline development. Therefore, staff believes this 2006 comment has been adequately addressed. Thank you.

Staff requests the final EIR for the 2007 General Plan update address the following additional concerns:

Transportation:

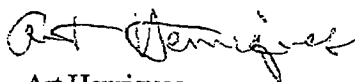
Regional transportation impacts are addressed in Section 4.6. of this document. TRAN-1A, TRAN-2B, TRANS-3B describe that implementation of the 2007 General Plan would have significant impacts to roads within and external to Monterey County. In addition, TRAN-1A describes that neither the County nor TAMC projects listed as capital improvement projects, which are to be funded by regional impact fees, will fully mitigate the impacts of the 2007 plan. Staff feels that the development of policies should reach outside the established benchmarks of Monterey's policies. In addition, if regional traffic created by an authority's planning guidelines may substantially degrade neighboring jurisdiction roadways for which higher standards are in place, the governing authority has the responsibility to ensure traffic impacts are mitigated accordingly. Currently, San Benito County has established policy describing a minimum LOS of C for roadways within our County. Areas within San Benito which may be affected by Monterey County traffic impacts primarily include the Aromas area and State Highway 101. Monterey County's planning guidelines may have a significant effect on surrounding jurisdictions and should be restrictive in nature in order to provide continuity with all surrounding regional planning guideline standards. By encouraging full mitigation of any potential impacts Monterey County would not place additional burden on neighboring jurisdictions.

Air Quality:

Both San Benito and Monterey Counties are located within the Monterey Bay Unified Air Pollution Control District's jurisdiction. Being that we are in a common air basin, a discussion should be included in the environmental document that addresses this concern and the possible significant effects such as high levels of traffic congestion along the 101 corridor could have on attainment levels within either jurisdictions.

Thank you again for the opportunity to comment.

Sincerely,



Art Henriques
Director of Building and Planning

Cc: Susan Thompson, CAO
Board of Supervisors