

HOPE - Helping Our Peninsula's Environment

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Monterey County
Planning and Building
Inspection Administration

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Monterey County Supervisors
Monterey County Planning Commission
Monterey County General Plan Staff

Comments on --

The Proposed Monterey County General Plan Update and Draft Environmental Impact Report are Extremely and Legally Incomplete

HOPE opposes the current General Plan and its EIR's --

1. Use of wildly inflated population numbers as growth goals.
2. Requiring 3 new 4-lane freeways to our Monterey Peninsula AND encouraging Gridlock
3. Failure to Include "Habitat Restoration and Species Recovery" as Goals.
4. Entirely Avoiding Monterey Pine Forest, and Wildlife and Habitat Protection beyond what is already required by federal and state law.
5. Avoiding Meaningful Avoidance, Alternatives and Mitigations to the Massive and Preventable Pollution our County Suffers from Chemicals including 10 Million Pounds of Pesticides Each Year; and Light and Noise Pollution.

A specific General Plan policy HOPE objects to is:

The fundamental assumption that the General Plan should accommodate the inflated population growth numbers handed down by the State Department of Health Services, Department of Finance, and AMBAG and support tens of thousands of new houses and the indirect loss of tens of thousands of acres of land.

We cannot find a specific policy that mentions this fundamental assumption that all other policy choices are built upon, although it is clearly described on page 1-4 of the Executive Summary.

A. The population of all cities on the Monterey Peninsula and the nearby unincorporated areas are going down. Yet the General Plan accepts accommodating population numbers that increase in all of those areas.

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B. The County has the choice to reject these numbers and lose the trivial amount (a few million dollars) of development funding as a result of that choice -- just as Santa Cruz has chosen to do for at least 10 years.

HOPE's primary mission is to protect our natural environment. Population growth leads to a cumulative increase and synergetic increases in every form of environmental impact by allowing an increase in human activity. Without population growth – merely stable population numbers, we can begin restoring the harmed and lost habitats for our neighbors who have lived here for millennia before we showed up.

Population growth forces new roads or freeways which increase potential for –

- logging, mining and development;
- directly change the hydrology of slopes and stream channels,
- increase natural resource exporting,
- increase air pollution (including plant harming dust) and
- water pollution (heavy metals from gasoline additives),
- decrease stream health,
- create noise,
- increase impermeable surface area,
- increase soil compaction,
- increase erosion and landslides,
- fragment wildlands,
- increase poaching and legal hunting and fishing,
- cut animal migration paths,
- cause massive numbers of deaths of wildlife called "roadkill" (especially for amphibians),
- modify animal behaviour (home range movement, altered movement patterns, decreased reproductive success, and decreased escape response),
- increase invasion of destructive non-native plants, insects and microorganisms;
- and divide human communities.

What we need instead is Down-zoning.

Downzoning by half or three-quarters is **not a Constitutional Taking**¹

The reduction in density so that the County will not accommodate any more growth and will cut back on population until it reaches an amount sustainable with the natural resources (such as water, forests and wildlife habitat) available.

¹ Downzoning By Half - Diminishing The Value Of Property By 50% Is Insufficient To Demonstrate A Taking - Thus Constitutional - Concrete Pipe, Inc. vs. Construction Laborers Pension Trust (1993)

In a post-Lucas case, the US Supreme Court returns to traditional Penn Central three-part formula and reaffirms that mere diminution in property value (in this instance, nearly 50%) does not amount to a taking. The Court expressly distinguished the generally applicable three-part test from the limited Lucas test, which applies only in cases involving the complete "destruction" of the economically viable use of real property. The Court held that Concrete Pipe's required 46% pay-out to withdraw from a multi-employer pension plan was not a taking. The nearly 50% property diminution fell far short of the complete destruction of economically viable use of the property.

Please also refer to our article on how to create affordable housing without new buildings.

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Roads & Freeways and "Circulation" - Creation of new and increasing capacity of existing roadways.

HOPE opposes Policies increasing roadway capacity.

Essentially all traffic experts agree there is overwhelming evidence that --

You Can't Pave Your Way Out Of Congestion.

Specifically HOPE opposes --

1. Widening of State Route 156 to four-lane
2. Construction of State Route 68 4-lane bypass
3. Widening of State Route One to four lanes (Castroville the Santa Cruz County)

3

Increasing roads to alleviate congestion is like loosening your belt to cure obesity.

HOPE's primary mission is to protect our natural environment. Roads can lead to every form of environmental impact by allowing any kind of human activity into formerly inaccessible natural areas.

New roads or freeways can allow population growth, increase potential for logging, mining and development; directly change the hydrology of slopes and stream channels, increase natural resource exporting, increase air pollution (including plant harming dust) and water pollution (heavy metals from gasoline additives), decrease stream health, and create noise, increase impermeable surface area, increase soil compaction, increase erosion and landslides, fragment wildlands, increase poaching and legal hunting and fishing, cut animal migration paths, cause massive numbers of deaths of wildlife called "roadkill" (especially for amphibians), increase wildlife hunting and poaching, modify animal behaviour (home range movement, altered movement patterns, decreased reproductive success, and decreased escape response), increase invasion of destructive non-native plants, insects and microorganisms; and divide human communities.

Habitat Restoration

The specific Goal is:

Missing!

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The Conservation element should include as a Goal to “Restore the natural phenomena to a safely sustainable state.” Nothing in the proposed Goals suggests an intent to improve the native habitat that we have harmed.

We need to at least have the goal to help our County environmental crisis recover from the massive damage we have caused.

Why was “Restoring the natural phenomena to a safely sustainable state” not included in the Goals?

The Conservation Element gives only an appearance of imperiled species protection because it provides serious loopholes that any halfway competent developer could drive an army of bulldozers through and chainsaw away the rest.

Wholly Inadequate Monterey Pine Forest, Wildlife and Habitat Protection

1. The specific policy is:

Missing!

Just like in 2004 and earlier drafts.

We must begin with the facts that here in Monterey County --

- We have seriously endangered some 82 local animal species (e.g. Condors, Sea Otters), plus 19 trees and plants which lived here for millenia before we arrived,
- There is something seriously wrong with the magnificent dark green cloak that protects and beautifies our Peninsula, warms us in the winter and cools us in the summer - our Monterey Pine Forest,
- Our Carmel River and its biggest animals are dying; and we are enduring an official water supply emergency began in 1998,
- Our Peninsula is infested with Gridlocked Highways,
- Our County agricultural system spreads 10 million pounds of deadly pesticides every year,
- Yet County officials keep approving more water guzzling golf courses, more habitat destroying subdivisions, roads and mansions and encouraging pesticide dependent agriculture as though nothing is wrong !

They do this in large part because Monterey County staff has been unable to find a single Significant Environmental Impact since 1985, and that same staff has not done any actual or meaningful Mitigation of genuine serious impacts.

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Since 1985 no matter how much harm a project has done to imperiled species, overpumped watershed and aquifers, added to gridlock or air and water pollution,

- No Monterey County Development EIR has found a Significant Environmental Impact !

* Is there any evidence that this has changed or will change?

B. Monterey County Mitigation is non-existent, so worthless that a Superior Court had to order new procedures to force the County to Monitor its own mitigation measures on a dozen projects. All the other projects remain un-monitored and un-mitigated.

* Is there any evidence that this has changed or will change?

Forty nine (49) animal species living in Monterey County are facing extinction to the point of needing official protection by Federal and State laws because Monterey County has utterly failed to protect them in any meaningful way.

HOPE's primary mission is to protect our natural environment. We are intensely interested in protecting wild animals, their habitats and the food chain they need in order to survive for the next few hundreds of years.

The **Conservation Element** begins with –

"The County's intent is not to alter existing regional, State or Federal laws and regulations..."

It should read **"The County's intent is to not provide a drop more protection than required by existing State or Federal laws and regulations, which in Monterey County are essentially not enforced."**

GP Allows destruction of critical habitat by paying fees. OS-5.17

"OS-5.17 The County shall prepare, adopt, and implement a program that allows projects to mitigate the loss of critical habitat. The program may include ratios, payment of fees..."

* What will force the County to meaningfully and actually protect those critical habitats with the fees?

* What will prevent (not minimize) the County from hiring only those environmental impact "experts" who have not been able to find any Significant Environmental Impacts? (e.g. Biostitutes etc.)

OS 5.17 "any mitigation measures recommended in the report, shall be used as a basis for CEQA documentation"

* What level of protection will the Mitigation measures be required to use? Avoidance of harm to the species?

The GP provides only the absolute minimum treatment (not protection) for imperiled species.

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Only for those species that have had "critical habitat" forced by courts and then only "promotes" protection – it does not require them.

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Monterey Pine Forest – Left Unprotected

For background – The native Monterey pine forest covered by this DGP and DEIR has absolutely no legal protection in Monterey County – none, nada, zero, zip,! Even though the EIR recognizes they are highly imperiled (G1 and S1 – page 4.9-7)²

- Huge areas of Monterey pine in this area (millions of pounds of trees) have been cut down without permits or penalty by PG&E.³

This General Plan does not provide any protection for the tree or its habitat - in fact the documents seem to take pains to avoid any protection for the tree and its habitat.

Exhibit 4.9.1 For the past 5 versions of this General Plan update HOPE has given the County at least 5 copies of up to date Monterey pine forest range maps - always acknowledged by staff - but the map remains not updated to include the almost untouched native Jeffers forest in Pescadero Canyon.

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EIR: In the Open Space intro there is no mention of Monterey pine Radiata or Point Lobos even though it is widely referred to as the "Jewell of State Park System"

Exhibit 4.9.5 "Critical habitat" is missing the FESA protected Yadon's Rein Orchid – which is almost fully native Monterey pine forest.

It would be very useful to the public, elected officials, developers and future planners so why can't you include a map of the range of the species covered by CEQA in the DEIR - particularly the native Monterey pine forest? The GIS maps used to exist in the original General Plan files in early 2001.

4.9-15 states "Several rare plants occur in the Monterey pine forest, including Monterey manzanita, Yadon's rein orchid, Gowen cypress (*Cupressus goveniana* ssp. *goveniana*), Monterey cypress (*Cupressus macrocarpa*) and Monterey Pine itself."

² Pinus Radiata (Monterey pine) was listed by the United Nations FAO in 1986 as an Endangered tree, BEFORE the species and its habitat became threatened by Pine Pitch Canker (*Fusarium subglutinans*).

³ April 1999 PG&E has probably destroyed over a million tons of Monterey pines in at least 3 different recent events in three different places on the Peninsula. There was Monterey pine destruction opposite Del Monte Center in 1997, next there was front page Herald coverage of the Monterey pine destruction at the Aguajito stables, and now this recent outrage near Carpenter street – just across the Highway from the Coastal Zone.

Please add **“Several rare and ESA protected animals inhabit the native Monterey pine forest including the California red-legged frog.”**

4.9-93 states *“Piperia yadonii* “Coastal bluff scrub, closed-cone coniferous forest, maritime chaparral, on sandy soils

Since *“Piperia yadonii* is almost dependent upon Monterey pine forest for habitat (more than 95% of known occurrences are in Monterey pine forest), please change this to read “Closed-cone coniferous forest (overwhelmingly Monterey pine), Coastal bluff scrub, maritime chaparral, on sandy soils.”

- Mitigation Measure HOPE-1: Downzoning areas with critical habitat by half or three-quarters to reduce the amount of development allowable. Downzoning by half or three-quarters is **not a Constitutional Taking**⁴ and can cost as little as the price of creating a zoning ordinance.

HOPE proposes the following mitigation measures to meaningfully potentially reduce direct development impacts of **BIO-1** to less than significant.

- Mitigation Measure HOPE-2: Downzoning areas with sensitive species (as used by the DEIR) by half or three-quarters to reduce the amount of development allowable. As noted above - downzoning by half or three-quarters is **not a Constitutional Taking**.
- Mitigation Measure HOPE-3: Avoid development in areas with critical habitat.
- Mitigation Measure HOPE-4: Avoid development in areas with habitat for sensitive species (as used by the DEIR).

“The 2007 General Plan policies do not sufficiently guide the implementation of future development so as to ensure avoidance, minimization, and/or compensation for impacts to sensitive natural communities. Thus impacts to sensitive natural communities are considered significant.” (pg 4.9-85)

⁴ **DOWNZONING BY HALF - DIMINISHING THE VALUE OF PROPERTY BY 50% IS INSUFFICIENT TO DEMONSTRATE A TAKING - THUS CONSTITUTIONAL**

Concrete Pipe, Inc. vs. Construction Laborers Pension Trust (1993)

In a post-Lucas case, Supreme Court returns to traditional Penn Central three-part formula and reaffirms that mere diminution in property value (in this instance, nearly 50%) does not amount to a taking. The Court expressly distinguished the generally applicable three-part test from the limited Lucas test, which applies only in cases involving the complete "destruction" of the economically viable use of real property. The Court held that Concrete Pipe's required 46% pay-out to withdraw from a multi-employer pension plan was not a taking. The nearly 50% property diminution fell far short of the complete destruction of economically viable use of the property.

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This says it all. This admits there are significant impacts to native habitats.

But then, even though there are no mitigation measures provided to protect the imperiled Monterey pine forest until at least 2030 – it then makes the wholly baseless conclusion --

“Implementation of General Plan policies, Mitigation Measures BIO-1.1 through BIO-1.5, and Mitigation Measures BIO-2.1 through 2.3 would reduce impacts of buildout on sensitive natural communities, riparian habitat, and wetlands to a less than significant level !”

This is beyond non-professional. **It defies logic.**

Since the EIR admits there will be significant impacts to sensitive natural communities including the Monterey pine forest (pg 4.9-85) and no mitigation measures provided to protect the imperiled Monterey pine forest until at least 2030 – please explain how this is possible?

Why is BIO-1-3 limited to Development in Focused Growth Areas (Community Areas, Rural Centers and Housing Overlays, Development requiring a discretionary permit, Large scale wineries in the AWCP – rather than **applied to the entire county**? The impacts described are not limited to those types of projects.

- Remember - Huge areas of Monterey pine in this area (millions of pounds of trees) were cut down without permits or penalty by PG&E in the 1990s. PG&E did not need a Discretionary permit.

This would leave Monterey pine forest **un-protected by this Measure directly contrary to the claim -** “Implementation of General Plan policies and Mitigation Measures BIO-1.1 through BIO-1.5 would reduce impacts of buildout on CEQA-defined special-status species and their habitat to a less than significant level.”

Since Measure BIO-1-3 leaves Monterey pine forest wholly un-protected how can the potentially huge impacts to the legally unprotect native Monterey pine forest be ‘less than significant?’“ (BIO-1 and 4 are only inventories, Bio-2 is only about kit-foxes and BIO-5 won’t be complete until at least 2030.)

QUANTIFICATION OF BASELINES AND IMPACTS:

1a. Please clearly identify by NAME and describe each of the objective (non-subjective) CRITERIA used to determine the impact significance of the **loss of BIOMASS of Monterey pines in kilograms or pounds.** This impact appears to be potentially significant.

This is a very different environmental impacts than the loss of numbers of trees or acres of trees. **There can be more than 200,000 seedlings per acre of native Monterey pine forest that in total weigh less than a single mature Monterey pine. A single Monterey pine can weigh 10,000 pounds of 5 tons. An acre of native Monterey pine forest can support 200-500 mature Monterey pines.**

1b. If no objective criteria are used please state that clearly.

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2. If no objective criteria are used please clearly describe how the threshold of significance chosen is scientifically testable, repeatable, falsifiable, credible and defensible.
- 3a. Please state the NAME of the MEASUREMENT UNITS (numbers) used to determine the significance for EACH criteria.
- 3b. Please quote the definition used.
4. If no measurement units are used please state that clearly.
- 5a. Please state the METHOD of measurement used to determine the significance for each criteria.
- 5b. If no method of measurement was used please state that clearly for each criteria and explain thoroughly how the data was obtained.
6. Please quantify the existing or current BASELINE measurement (level) for each criteria.
7. Please state its MARGIN of ERROR or a confidence level and whether the MARGIN of ERROR is measured or assumed.
8. Please state the VARIANCE or fluctuation, assumed or expected for each of the criteria listed above.
9. Please state the variance's MARGINS of ERROR or confidence level.
10. Please state whether this MARGIN of ERROR is measured or assumed.
11. If an average is used, please state which kind of average.
12. Please state the most extreme values which could be encountered.
13. Please describe and quantify which criteria and ASSUMPTIONS the Impact Significance predictions are most SENSITIVE.
14. Please analyze and quantify how sensitive those predictions are to reasonably foreseeable varying criteria and assumptions.
15. Please provide a graph of HISTORICAL measurements.
16. Please quantify the length of time this impact would last.
17. Please quantify how this impact would vary over that time period. Please use a graph for clarity.

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18. Please state the THRESHOLD number at which the impact changes from significant to less-than-significant and the clear rationale for that number.
19. Please provide the MARGIN of ERROR used (in percent and absolute amount) for measuring the Significance THRESHOLD Level.
- 20s. Please state whether this MARGIN of ERROR is measured or assumed.
- 20b. If no margin of error is used please state that clearly.
21. Please disclose all threshold numbers at which the impact changes from LEGAL to ILLEGAL for ALL related and potentially relevant local, state and federal laws.
22. Some Impacts increase in a LINEAR RELATIONSHIP with increasing input, other impacts have complex non-linear relationships.
Please provide a graph that shows whether the relationship is linear or otherwise - when at and near the significance threshold values.
23. Please quantify the total PERCENT MAXIMUM CHANGE, to which the IMPACT could raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
24. Please state whether the MARGIN of ERROR is measured or assumed.
25. Please state whether this total PERCENT maximum change is an AVERAGE amount, a worst case expected or a best case expected.
26. Please quantify the ABSOLUTE MAXIMUM AMOUNT, to which the impact would raise or lower the baseline number and its MARGIN of ERROR or confidence levels.
27. Please state whether the MARGIN of ERROR is measured or assumed.
28. Please state whether this total maximum change amount is an AVERAGE amount, a worst case expected or a best case expected.
29. Please list all potential CUMULATIVE impacts related to this one.
30. Please describe all potential CUMULATIVE impacts related to this one.
31. Please quantify all potential CUMULATIVE impacts related to this one.
32. Please list, describe and quantify all potential compound and synergetic impacts.
33. Please list, describe and quantify all Construction impacts related to this one.

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34. Please list, describe and quantify all Growth impacts related to this one.
35. Please list, describe and quantify all Indirect impacts related to this one.
36. Please list and quantify every OTHER IMPACT - this impact or mitigation could increase.
37. Please describe the EXISTING USABLE limit of the RESOURCE this impact affects.
38. Please state the METHOD of measurement used to determine the limit of the RESOURCE this impact affects.
39. Please describe the MARGIN of ERROR or confidence level used to measure how much of this resource is left.
40. Please state whether the margin of error is measured or assumed.
41. Please quantify what is the maximum amount (in AMOUNT of existing) of this resource that can be lost and still be restored.
42. Please quantify what is the MAXIMUM amount (in PERCENTAGE of existing) of this resource that can be LOST and still be restored.
43. Please name each EXPERT who prepared and reviewed this impact.
44. Please cite each expert's training, and peer reviewed, validly published articles specific to this impact.
45. Please provide AVOIDANCE MITIGATION for this impact.
46. Please provide the reverse of this impact as Mitigation.
47. Please provide an ALTERNATIVE which avoids this impact.
48. Please list all other studies initiated by the applicant related to this impact, including subject matter breadth, author's names and dates and where they can be examined.

Process -

1. We request that - the evidence and materials in the administrative record for the 2004 General Plan be made a part of all hearings and considered.

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2. Two Criteria for Determining Significance Missing (4.9.5.2)

You are missing two critical thresholds – the loss of a single individual of a protected species, and the loss of a quarter acre of their habitat. While these are mentioned in passing on page 4.9-79 it should be included in the bulleted list of thresholds.

Death of a Single Individual of a Listed Species is a Significant CEQA Impact

- The loss or death of a single individual of a protected species must have a Finding of Significant Impact as required by CEQA Section 15065(a).

"15065. Mandatory Findings of Significance"⁵

"A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where any of the following conditions occur:"

"(a) The project has the potential to ... reduce the number (or restrict the range) of an endangered, rare or threatened species, ..."

"Reduce the number" means the loss of a single individual (e.g. from 500 to 499).

- The loss of as little as a quarter of an acre of habitat a single individual of a listed species must have a Finding of Significant Impact under CEQA Section 15065.

"Since a finding of significance under the Environmental Quality Act is required if [the] range of a single rare or endangered plant is restricted by a proposed development, information regarding existence of additional, previously unidentified, rare plant species merely affected magnitude of the impact of the proposed development, and a subsequent or supplemental environmental impact report would have to examine affected plant populations as part of its evaluation of the environmental impact. West's Ann.Cal.Pub.Res.Code § 21152, §21166"

- Mira Monte Homeowners v. San Buenaventura Cty. Etc. 165 Cal.App.3d 357; 212 Cal.Rptr. 127 (Cal.App.2 Dist. 1985)

EIR: Golf Courses are open space !?!

⁵ CEQA Guidelines 15065. Mandatory Findings of Significance (as of Apr 3, 2003)

A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where any of the following conditions occur:

(a) The project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish and wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare or threatened species, or eliminate important examples of the major periods of California history or prehistory.

"Under the State Guidelines, outdoor recreational land use is also considered open space, thus based on the definition golf courses are considered open space."

-pg 9 of OS EIR

Stop that.

Golf Courses are wildly different from the common understanding of Open Space.

They are made with almost completely non-native materials and vegetation and drowned in thousands of pounds of pesticides, fertilizers and emergency drinking water that should be used for humans.

Please create a new category for Golf Courses (e.g. "Intensely Modified Outdoor Recreation Areas") so no one can confuse them with genuine wildlands or habitat.

Calderon, Vanessa A. x5186

From: David Dilworth [David8@1hope.org]
Sent: Monday, February 02, 2009 4:05 PM
To: ceqacomments
Subject: GP 09 CEQA Questions



GPLAN09.PDF (69
KB)

Attached is a letter from HOPE on the Proposed 2009 General Plan and DEIR. We object to the DEIR and have suggestions for improving the GP. -David