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LEAGUE OF WOMEN VOTERS  
OF THE MONTEREY PENINSULA

January 6, 2009

Mike Novo  
County of Monterey  
Director of Planning  
168 West Alisal St., 2<sup>nd</sup> Floor  
Salinas, CA 93901

SUBJECT: COMMENTS ON 2007 GENERAL PLAN AND DEIR

Dear Mr. Novo:

The League of Women Voters of the Monterey Peninsula and the League of Women Voters of the Salinas Valley have reviewed GPU5 and the DEIR. Our comments follow:

2007 Draft General Plan (GPU5)

We are happy to see many of the changes to the updated plan. In particular, we support the reduction in the number of Community Areas and Rural Centers which will mean less sprawl and more compact growth. Limiting one unit for each residential lot of record in most of the Toro Planning Area, in North Monterey County and parts of the Great Salinas Area will begin to address those areas' serious water supply problems. Finally, the prohibition against subdividing agricultural land will help preserve one of Monterey County's prime economic sectors.

1

We do not support eliminating the prohibition against cultivation on uncultivated slopes greater than 25%. There are over 500,000 acres of such land in private ownership in the county. Many of these acres are rich in biological and habitat resources which require protection. Furthermore, sufficient land under 25% slopes exists within the county to accommodate viticulture growth.

2

We are concerned the policies protecting rare and endangered species have also been weakened to include only listed species. Limiting the policy to these species is inconsistent with CEQA Guidelines which require evaluation of candidate and special status species identified by the California Department of Fish and Game and U.S. Fish and Wildlife Service. Protecting all these species in the General Plan is a far more effective and efficient approach than addressing their protection on a case-by-case basis where project level impacts as well as as cumulative impacts must be identified and mitigated as needed.

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The Circulation Element, and hence the Noise Element, are inadequate. The Circulation Element does not meet California General Plan Guidelines which require identification of a road system needed to meet General Plan buildout. The Noise Element cannot obviously identify anticipated noise levels from a nonexistent road system.

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Finally, we do not support exemption of many of the proposed uses in the Winery Corridor from CEQA. A reading of the DEIR confirms that these projects may have significant adverse impacts on traffic, wildlife corridors and biological resources. Most of the mitigation for these issues is deferred until project level review which would be exempt from CEQA under GPU5 policies. Attempting to change State law through the General Plan process is flawed, and this exemption should be eliminated.

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DEIR

PROJECT DESCRIPTION

1. Page 3-4. One of the objectives of GPU5 is to "Modify existing land use designations to patterns that accommodate the most recent population growth, housing, and employment projections..." The Plan and DEIR rely on the 2004 AMBAG projections, not those adopted by AMBAG in June 2008. The 2008 forecasts are considerably lower than the earlier ones. As the DEIR notes, using the higher forecasts overestimates impacts and is thus more conservative. However, this rationale does not apply to the 2008 Air Quality Management Plan for the Monterey Bay Region (AQMP) which includes the 2008 forecasts and accommodates a smaller population, thus making GPU5 inconsistent with the AQMP.

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2. P. 3-8. The DEIR states GPU5 growth assumptions are derived from AMBAG's 2004 population forecast and that 2006 projections were adjusted to correct for traffic analysis zones (TAZ) that will be annexed into cities. This statement suggests that both the distribution and amount of growth were determined based on TAZ and AMBAG data.

AMBAG's 2004 forecasts and TAZ data used in AMBAG's traffic model show declining growth on the Monterey Peninsula for Carmel, Del Rey Oaks, Monterey, Pacific Grove, Sand City, and most unincorporated areas between 2005 and 2030. Population in the cities alone is shown to decline by 1,784 between 2005 and 2030.

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Table 3-8 identifies new growth by planning area to 2030. Growth for the Monterey Peninsula shows that 1,760 dwelling units would be built in Carmel Valley, Mid-Carmel Valley AHO, the Greater Monterey Peninsula and the Highway 68/Airport AHO. GPU5 growth on the Monterey Peninsula is inconsistent with the 2004 AMBAG population forecasts and data used for the traffic model.

3. P. 3-9. The DEIR references both AMBAG and DOF forecasts. These forecasts include coastal areas which are excluded from analysis in the DEIR. Please explain how these forecasts are adjusted to account for this exclusion.

Additionally, it was determined that the Del Monte Forest LCP need not be analyzed because growth is not expected to occur there. The property owners (Pebble Beach Co.) are currently reworking a development plan, after a previous one approved by County

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- voters and the Board of Supervisors was not approved by the Coastal Commission. There may be expanded commercial (hotel) development, as well as new residential subdivisions. While growth and residential subdivisions will be limited by the Plan, building and development in the area may occur sooner than in others; since water and sewer service is available. Potential growth in this area should be addressed. 8
4. P. 3-10. The DEIR states that about 417 building permits are issued yearly. Please identify the source for this information. 9
5. P. 3-13. Table 3-5 shows that 2030 buildout of GPU5 would be 10,015 new units based on using an adjusted 2006 number minus AMBAG 2030 dwelling unit number. (48,670 minus 38,655). AMBAG's 2030 forecasts include growth in coastal areas which are excluded from Table 3-8. The DEIR for GPU4 identified over 2,500 lots of record for coastal areas. Please explain how growth in coastal areas is accounted for in GPU5 2030 buildout number of 10,015 new units and its relationship to AMBAG's 2030 forecasts. 10
6. P. 3-16. Table 3-8. This table identifies where growth would occur by 2030 and 2092. The table excludes coastal areas, units that could be built in the Winery Corridor and subdivisions that could be built outside of Community Areas and Rural Centers. Winery Corridor units allowed under AWCP Policy 3.3 would total at least 200. Subdivisions that could be built outside of Community Areas and Rural Centers are allowed under GPU5. GPU4 estimated 1,200 units could be built in this category. Explain why growth in these categories are excluded from the 2030 buildout number. 11
- This table also identifies full buildout for 2092. Buildout should be based on land use designations identified in GPU5. However, some buildout numbers are inconsistent with GPU5 policies. For example, in North County and Toro Planning Areas, policies limit development to one unit per legal lot of record, yet the buildout numbers far exceed development allowed under the policies. Buildout for 2092 numbers should be re-evaluated to assure consistency with GPU5 policies.
- LAND USE
7. Page 4.1-3. The DEIR states GPU5 would not amend the County's Local Coastal Program. This is inconsistent with the proposed Castroville Community Area which is in the Coastal Zone. As stated earlier in the DEIR, the plan for this area has been submitted to the Coastal Commission for action. Even so, GPU5 includes the Castroville Community Area as one of five community areas for development, and thus, GPU5 would amend the County's Local Coastal Program. 12
8. Page 4.1-7. The DEIR implies that the Growth Management Policy adopted in 1979 is part of GPU5; however, GPU5 does not reference this policy. A similar reference to this policy is made on p. 4.1-20 of the DEIR (this policy "...forms the underlying foundation of the entire 2007 General Plan"). The relationship between the policy and GPU5 should be clarified. , 13

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| 9.  | <u>P. 4.1-10, line 7.</u> "incorporated" areas should be "unincorporated" areas.  | 14 |
| 10. | <u>Page 4.1-18.</u> The DEIR references updating zoning ordinances as a mechanism to "promote" consistency between GPU5 and the zoning ordinances. Since zoning ordinances are required to be consistent with general plan under State law, "promote" should be changed to "assure".  | 15 |
| 11. | <u>P. 4.2-27.</u> The DEIR implies that the conversion of over 2,000 acres of agricultural land to urban uses is needed to meet requirements of State Planning Law. As discussed above, 2030 buildout would be 10,015 new units. Using 2008 AMBAG forecasts of housing growth in unincorporated areas between 2005 and 2030 (8,270 units) and accounting for units not included in the 2030 buildout number as described above, units would far exceed AMBAG forecasts. Conversion of over 2,000 acres of agricultural land cannot be justified based on these forecasts. | 16 |

### WATER RESOURCES

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|-----|--|----|
| 12. | The DEIR should add a brief description of Ordinance 135 recently adopted by the MPWMD to the Regulatory Framework. It expands the Monterey Peninsula Water Resource System to include the entire Seaside Groundwater Basin, thus adding Cal-Am systems serving Bishop, Hidden Hills and Ryan Ranch. This permits the WMD to restrict production and order conservation measures as needed to prevent further overdrafting of the Basin.   | 17 |
| 13. | <u>P:4.3-34.</u> Agricultural water demand in the Salinas Valley is projected by MCWRA to decline by 60,000 AFY by 2030. Does this estimate account for increased agricultural use that would be allowed on steep slopes?  | 18 |
| 14. | <u>P. 4.3-34.</u> Discussion of the Salinas Valley Water Project should identify whether reference is to Phase I or Phase II or both phases.   | 19 |
| 15. | <u>P.4.3-39.</u> The DEIR states that no additional demand in the Carmel River basin is expected under GPU5. This contradicts the earlier reference to the Mid-Valley AHO and new development of 266 lots (p. 4.3-38) in Carmel Valley. In addition, the following development which would be supplied by water from the Carmel River and Seaside aquifer is described on Table 3-8: 510 units on the Greater Monterey Peninsula including 976 units for the Highway 68/Airport AHO. This development is in addition to development expected within the cities on the Monterey Peninsula. Finally, the discussion of water for the Monterey Peninsula should be updated to, 'at a minimum, describe the desalination plant being constructed by CâlAm for the City of Sand City. | 20 |
| 16. | <u>P. 4.3-41.</u> The discussion of the PVMWA is significantly out-of-date and should be revised to include new information about water supply alternatives and the tenuous situation of the Agency.   | 21 |

17. P. 4.3-54, Table 4.3-8. This table identifies 21 streams, canals and bodies of water in Monterey County that are polluted and require preparation of action plans between 2008 and 2019. The DEIR finds that implementation of GPU5 policies would prevent significant impacts of 2030 and 2092 development-on these bodies of water. Many of the referenced policies are voluntary. Mitigation Measure PS-1 (p. 4.11-34) requires all future development implement the most feasible number of Low Impact Development Techniques as possible; however, it does not limit post-runoff to pre-development runoff. Without this provision, urban runoff will continue to impact our local streams and waterways. 22
18. P. 4.3-102. The DEIR acknowledges that Routine and Ongoing Agricultural Activities except those occurring on conversion of previously uncultivated lands are exempt from permit requirements including those to prevent soil erosion. However, with limited discussion of this exemption, GPU5 land use is found to have no significant impact on erosion. This finding is unsubstantiated. 23
19. P. 4.3-114. The DEIR relies on AMBAG projections for agricultural employment and MCWRA water projections to support its contention that there will be no net expansion in overall agricultural acreage through 2030. This is inconsistent with an earlier finding (p.4.3-108) that future vineyard planting may be an indirect result of the AWCP. Based on the vineyard conversion rate of over 11,000 acres between 1996 and 2006 and the potential impact of the AWCP, the finding regarding no expansion of agricultural acreage should be further substantiated. 24
20. P. 4.3-119. The discussion regarding seawater instruction in Fort Ord communities and Marina states that Cal-Am proposed desalination plant is a potential source of water for these areas. The Cal-Am proposal would only provide water to address Order 95-10 and Seaside Aquifer adjudication requirements. 25
21. P. 4.3-120. Do water demand estimates for wineries include water for sterilization of equipment and other operational needs? 26
- 22.. P. 4.3-127. Reference is made to the Coastal Water Project providing sufficient water to enable Fort Ord allotments to be met. Fort Ord projects are not served by Cal-Am. 27
23. P. 4.3-137. The Water for Monterey County's Regional Water Supply Program has been revised to exclude brackish water desalination. 28

#### GEOLOGY, SOILS AND EROSION

24. Pp. 4.4-37 to 4.4-43. The DEIR addresses the potential for increased erosion from implementation of GPU5. It concludes that GPU5 policies and existing federal, state, and local erosion control requirements do not adequately mitigate significant impacts. It finds that Mitigation Measure BIO-2.1 would reduce impacts to less-than-significant. This measure would require the development of a Stream Setback Ordinance applicable to all 29

discretionary permits and conversion of previously uncultivated agricultural land on normal soil slopes over 15% or on highly erodible soils on slopes over 10%. This is a deferred mitigation measure with no specific performance standards other than to "reduce sediment and other-water quality impacts of new development" This does not meet CEQA requirements for mitigation measures.

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### MINERAL RESOURCES

25. P. 4.5-5. Under the discussion of abandoned mines, why is there no mention of the abandoned asbestos mine near King City?

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### TRANSPORTATION

26. P. 4.6-23. The DEIR notes that the roadway networks assume construction of the TAMC regional fee programs as well as the capacity enhancements proposed by the County in GPU5. Construction of all but 12 of the improvements on TAMC regional fee project list depend on passage of the 1/2-cent sales tax which was defeated in the November 2008 election. Without the sales tax, it is unlikely that these improvements will be constructed on schedule or constructed at all. Additionally, the DEIR should explain the need for significant additional local revenues, as well as state and federal, to fund necessary traffic improvements.

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27. P. 4.6-26, Table 4.6-13. This table includes widening Espinosa Road. This improvement is not identified on Table C-2 of GPU5.

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28. P. 4.6-27. The DEIR indicates that new development is not expected to occur in coastal areas under general plan buildout. The Final EIR for GPU4, Tables 3-2, 3-5, 3-8, identified 2,589 Coastal Zone Legal Lots of Record. Please identify how coastal units were accounted for in the traffic model.

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29. P. 4.6-31. The DEIR finds that project-specific impacts on county roadways would not fall below LOS D because of Circulation Element Policies. The DEIR fails to address Policy C-1.1 which allows County roads and intersections to degrade below D through the Community Plan process.

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30. PP. 4.6-53, 4.6-77, and 4.6-107. The DEIR finds that GPU5 would not conflict with the provision of alternative transportation since the Plan would concentrate development in Community Areas, Rural Centers and Affordable Housing Opportunity overlays. The analysis assumes that these areas can readily be served by alternative modes of transportation. It fails to account for communities such as Pajaro and the seven rural centers which are dispersed throughout the county at densities and locations that are not readily serviced by public transit (over 1,000 units). The plan allows for subdivisions outside any of the areas described above as well as sprawl development of over 2,000 units

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in the planning areas, not to mention the potential development of over 2,000 units dispersed throughout coastal areas. Finally, the AHO program is intended to promote more affordable housing near public transportation, places of employment, shopping and schools. The DEIR should analyze how each of the Districts meets these criteria.

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31. P. 4.6-57. The DEIR addresses project-specific impacts of development under "2030 cumulative plus project conditions" which is defined as GPU5 2030 buildout plus growth in cities to 2030. It finds the impact on roads to be less than significant based on GPU5 policies. Since GPU5 policies allow for a fair-share contribution to roadway improvements rather than requiring improvements concurrent with projects, the conclusion is not supportable. Further, GPU5 policies do not affect city projects which could contribute to cumulative impacts.

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32. P. 4.6-116. The DEIR finds that impacts to Winery Corridor roadways can be mitigated through capacity and safety improvements and these mitigation measures would be implemented through a combination of project-specific mitigation and a CIP. Policy 3.3 of the Winery Corridor Plan exempts the following uses from CEQA review: artisan wineries, tasting rooms, visitor-serving uses, and food service facilities. The DEIR finds that Winery Corridor projects may have a significant impact on roadways and that mitigation measures may be required. This finding calls into question the CEQA exemptions proposed in Policy 3.3. Further, the DEIR fails to address safety issues related to the conflict between agricultural vehicles which use County roads and visitors to wine tasting facilities.

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33. Transportation Section. The DEIR does not address the impact of new development on deteriorating roads and highways. The County has a deferred maintenance cost of \$800 million. At current annual expenditures and with proposed development, the roadways will continue to degrade increasing safety hazards and more and more potholes.

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AIR QUALITY

34. This section relies on the 2004 AQMP to determine GPU5's cumulative impact on regional ozone levels. As noted earlier, the AQMP was updated in 2008 and includes significantly lower population forecasts. GPU5 should be found to have a significant impact on regional air quality. The DEIR's cumulative impact analysis as defined in this section only addresses cumulative growth in unincorporated areas and fails to address city growth as was undertaken in the Transportation Section of the DEIR. This analysis should be prepared. Since the 2008 AQMP does not show attainment of State ozone standards at any time in the future and the project is inconsistent with the AQMP, the health impacts of on-going regionwide violations of these standards should be addressed.

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The analysis of the impact of fermentation emissions on ozone levels relies on annual daily averages rather than reflecting the distribution of emissions as identified in the DEIR (Table 4.7-1). This analysis should be revised to reflect actual daily emissions.

35. P. 4.7-7. The DEIR incorrectly identifies the designation status for State and Federal ambient air quality standards and fails to reference PM<sub>2.5</sub> standards. This section should be updated (see 2008 AQMP, p. 2-5). 40
36. P. 4.7-8. The air monitoring station in Carmel Valley is excluded from the list of Monterey County stations. 41
37. P. 4.7-8. Table 4.7-2 is identified as presenting air quality monitoring data for the last three years; however, this table lists VOC emissions from wine fermenting and ageing. 42
38. P. 4.7-15, Table 4.7-3. The table shows the following population forecasts for GPU5:
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|-------------------|---------|
| 2000 with project | 509,692 |
| 2030 with project | 437,665 |
| 2030 Cumulative   | 602,790 |
- The 2000 number makes no sense. It is over 72,000 people higher than the 2030 number. The 2000 population for Monterey County was 401,312, not 509,692, and unincorporated Monterey County was 110,083. The 2030 population with project is identified as 437,665; unincorporated Monterey County population based on 2004 AMBAG forecasts would be 135,375. 43
39. P. 4.7-17. The DEIR concludes that "2092 Buildout" of GPU5 would not significantly impact air quality because GPU5 policies require measures to avoid or minimize adverse impact on air quality "to the maximum extent practicable." Such measures do not assure that development would remain consistent with the AQMP. As described above, the "2030 Buildout" is inconsistent with the 2008 AQMP. Lacking GPU5 policies that assure consistency, GPU5 "2092 Buildout" should be found to have significant impacts on regional ozone levels. 44
40. P. 4.7-20. Mitigation Measure AQ-1 includes a new policy, OS-10.5. Several words are omitted from the proposed policy, making it incomprehensible. It is impossible to determine if the policy would mitigate significant adverse impacts of emissions from construction. 45
41. P. 4.7-33. The DEIR finds that implementation of GPU5 would increase exposure to diesel exhaust emissions which are classified as toxic air contaminants. It finds that with implementation of Mitigation Measures AQ-6, impacts would be reduced to less than significant. Mitigation Measure AQ-6 would require that construction contracts be given to contractors who show evidence of the use of soot traps, ultra-low sulfur fuels and other diesel engine emissions upgrades that reduce PM<sub>10</sub> emissions to less than 50% of the statewide PM<sub>10</sub> emissions average for comparable equipment. No evidence is provided that supports a finding that these measures would reduce emissions to less than significant. 46

Since these controls may not always reduce diesel exhaust emissions to levels that protect



the public health (see DEIR for Rancho Canada Village), the mitigation measure should include an additional requirement that all project applicants work with the Monterey Bay Unified Air Pollution Control District to assure that health based standards are met.

Mitigation Measure AQ-7 includes a new policy, OS-10.10, that provides that development of new sensitive land uses **should** not be located any closer than 500 feet of a freeway carrying more than 100,000 vehicles per day. Even though Policy OS-10.10 is not required, the DEIR concludes impacts of exposure to diesel exhaust emissions would be less than significant. This finding should be supported by evidence.

42. P. 4.7-34. The MBUAPCD has identified diesel risk corridors for the NCCAB to address Environmental Justice requirements of the Carl Moyer Grant Program. The risk corridors include major highways and arterials in the Basin and identify areas along the corridor where the cancer risk is greater than one incident per 100,000 population, the Districts threshold of significance for toxic air contaminants. Over 80 percent of the population residing in the three county Air Basin lives within a diesel risk corridor.

The DEIR addresses the impact of diesel exhaust from construction activities. It, however, does not substantially address the increase in operational diesel exhaust emissions from mobile and stationary sources. The DEIR concludes that with mitigation measures identified above, "2092 Buildout" would not result in significant health risks due to diesel exhaust. Since urban development intensifies the concentration of diesel exhaust, please explain why it is unlikely that the cumulative impact of diesel exhaust emissions would not be significant and unavoidable. A mitigation measure requiring that project applicants work with the Air District to assure that the cumulative impacts of diesel exhaust emissions fall within public health standards should be added to the list of mitigation measures.

The DEIR also fails to address the cumulative impact of other sources of toxic emissions such as gasoline dispensing stations on existing levels of toxic air contaminants. Since over 80 percent of the population is already exposed to levels exceeding the District's threshold of significance, increases in traffic congestion and other sources of toxic air contaminants allowed by the GUP5 would have a significant and unavoidable cumulative impact on the public's exposure to toxic air contaminants.

43. Air Quality and Fugitive Dust Emissions from Agricultural Operations. GPU5 policies would allow cultivation on steep slopes. With an estimated 500,000 acres of privately owned land with slopes over 30%, conversion of slopes to agricultural would increase. Since PM<sub>10</sub> emissions from agricultural operations is a major source of PM<sub>10</sub> emissions in Monterey County, implementation of GPU5 may have a significant adverse effect on air quality. Increased fugitive dust emissions from conversion of slopes should be addressed.

#### BIOLOGICAL RESOURCES

44. P. 4.9-73. The DEIR finds that GPU5 would result in reduced numbers, range and habitat

and quality for plant, wildlife and fish species that are defined as "rare, threatened, or endangered" under CEQA. The following mitigation measures are recommended:

- a. Preparation of a -baseline inventory to be updated every ten years.-
- b. Salinas Valley conservation Plan to preserve the San Joaquin kit fox.
- c. Project level biological survey and avoidance, minimization, and compensation for species identified in the baseline inventory. The policy would apply to Community Areas, Rural Centers and Housing Overlays; development requiring discretionary permits and large scale wineries in the AWCP.

The DEIR notes that cultivation on uncultivated steep slopes allowed under GPU5 could have a significant impact on biological resources. It, however, concludes (p. 4.9-76) that conversion of uncultivated agricultural lands to new farmland would not have a significant impact based on a conversion rate of 450 acres per year (1982-2006) and the assumption that cultivation would be dispersed.. Because these activities would be excluded under the proposed mitigation measures, they should be found to have a significant and unavoidable impact on biological resources.

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Further, the analysis does not address the 40 artisan wineries, 200 dwelling units, tasting rooms and other facilities that would be allowed in the AWCP. Because these facilities would be exempt from CEQA under GPU5 and therefore from proposed mitigation measures, they should be found to have a significant and unavoidable impact on biological resources.

45. P. 4.9-94. Mitigation Measure Bio-3.1 requires discretionary projects to retain movement corridors. GPU5 is found to not have a significant impact on wildlife corridors based on the same reasoning described above. And for the same reasons we have identified above, GPU5 should be found to have a significant and unavoidable impact on wildlife corridors. Additionally, the wildlife corridors affected by the AWPC should be identified and the impacts of nondiscretionary projects permitted under the AWPC should be addressed.

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#### PUBLIC SERVICES AND UTILITIES AND HAZARDS AND HAZARDOUS MATERIALS

46. P. 4.11-14 and 4.13-25. The DEIR finds that development and land use activities proposed in GPU5 may result in a need for new or expanded fire facilities but that policies in the Plan would mitigate impacts to less than significant. This finding is based on policies affecting development within Community Areas, Rural Centers and AHOs.

The DEIR does not address the more than 2,000 units that could be constructed in inland areas and the cumulative impact on fire services of units within Coastal areas. Under GPU5 development would be allowed in areas with a response time of 45 minutes. Based on buildout potential in rural areas and a response time of 45 minutes, extensive rural development would be allowed requiring a demand for more fire protection both by numbers of residences and their location near fire hazard areas. The DEIR fails to analyze the impacts associated with dispersing new units throughout the large rural areas of the

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county. Already overstrained services would be further weakened as a result of emergency personnel having to make more trips to distant sites.

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47. P.4:11-2 and 4:13.25 The DEIR does not adequately describe the availability of fire services in the unincorporated area. This section should be rewritten to address the lack of fire coverage along the southern 101 corridor and in other areas. Additionally, it should be revised to describe the types of services provided by CDFFP. The services of the CDFFP are not intended to provide fire protection for structures. Very high fire hazards make many areas unsafe for development and occupancy unless strong fire safety measures are taken. Even where structural protection does exist, fire suppression may be hampered by lack of water, rugged terrain and delayed response times. The DEIR should provide information that will allow for an assessment of high fire hazards and identify those areas that do not have structural coverage.

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48. The Affordable Housing Overlay District is a new attempt by the County to create an incentive program which encourages developers to build more affordable housing. It includes fast-track processing, fee waivers, higher densities, etc. plus requirement of specific minimum percentages of low income through workforce housing. The Housing Element adopted in 2003 did not include this program, so it does not contain a description of the available public services to serve the areas designated as AHOs, or the constraints. This information is given for the Rural Centers and Community Areas, but isn't added for AHO's in the GPU5 Update.

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In the designated AHO Districts the infrastructure costs which must be shared by the developers of projects may be high. The increased densities which could be allowed (up to 30 du/acre) would help with economic viability and promote clustering; however, wastewater treatment systems would be needed. Plan policies favor connection to existing systems, but the DEIR does not identify whether these are available near the AHOs. This information should be added.

#### AESTHETICS, LIGHT AND GLARE

49. P. 4.14-30. The DEIR states that because specific locations of future AWCP facilities are unknown at the time the DEIR was prepared, further analysis of potential scenic vista impacts will be done at the project level. This finding fails to account for GPU5 policies that exempt most facilities in the AWCP from CEQA review and is an acknowledgment of inapplicability of the GPU5 policy.

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#### HOUSING AND POPULATION

50. P.4.15-2. The DEIR attempts to justify the use of outdated AMBAG forecasts because the AMBAG traffic model, the adopted Housing Element and AQMP are based on them. The 2008 AQMP was updated in August 2008 to include the 2008 AMBAG forecasts. The new fair share housing allocation which was revised by AMBAG in the spring of 2008 shows a significantly lower affordable housing requirement than the number

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- included in the adopted Housing element as acknowledged on p. 4.15-8. This section is significantly out-of-date and should be revised. | 55
- 5-1.-- P. 4.15-2. This table cites DOF population--data of 432,600 as the 2005 estimate. This appears to conflict with the discussion on p. 4.15-12 which states the DOF estimate for July 2007 was 425,546, over 7,000 people lower. | 56
52. P. 4.15-5. Using out-dated AMBAG forecasts, the DEIR concludes that population in unincorporated Monterey County will decline between 2005 and 2010. The revised forecasts show an increase of over 3,300 people. | 57
53. P. 4.15-13. The DEIR states GPUS has a "2030 Buildout" potential of 10,015 new units between 2006 and 2030. Referring to the 10,015 new unit number as "2030 Buildout" is misleading, since buildout of the GPU5. is actually 35,704 new units (P. 4-15.17). | 58
54. P. 4.15-15. The text lists Community Areas and Rural Centers intended for development. The list excludes San Lucas, Lockwood and Pleyto Rural Centers. It does not identify units to be developed outside those areas, in the Coastal Zone and within Winery Corridors. | 59
55. P. 4.15-17. The DEIR identifies another buildout number of 74,573 total units or 35,908 new units between 2005 and 2092 (74,573-38,869). This would be 25,893 new units beyond those identified for "2030 Buildout". Since there would be limited development potential within Community Areas and Rural Centers by 2030, the 25,893 new units would be dispersed throughout unincorporated areas further contributing to urban sprawl. | 60
56. P. 4.15-17. Does the buildout number include buildout on all designated land uses, e.g., Resource Conservation, Grazing Land, coastal zone, etc.? | 61

#### CLIMATE CHANGE

57. P. 4.16-5. Table 4.15-1 identifies GHG emissions; however, it does not indicate if these are daily or annual emissions or what the units are — pounds or tons. In 2005, mobile sources in Monterey County generated 7,440 tons or 14,800,000 lbs per day of CO<sub>2</sub> (2008 Air Quality Management Plan for the Monterey Bay Region). Assuming unincorporated Monterey County's share is 25%, emissions would be 1,850 tons per day or 675,250 tons per year. Based on this analysis, we assume the units on the table are annual tons. | 62
58. Appendix B — Greenhouse Gas Emission Inventory and Forecast Methodology. While this appendix describes the methodology, it does not provide any of the assumptions or data used to calculate GHG. Without the data, it is impossible to verify emission calculations. | 63

#### ALTERNATIVES TO GPU5

59. P. 5-7. The alternatives are not based on the same assumptions. Table 5-1 identifies buildout for the 1982 GP has 13,570 dwelling units. This number is from the Table 1, Analysis of Monterey County General Plans & Quality of Life Initiative, 2006 Bay Area Economic Report (not 2007 report as-stated-in-the-DEIR); GPU5 buildout is identified as 13,420 new units in Table 5-1; 10,015 new units in Table 5-2; and 21,666 new units in Table 5-5. In any case, buildout as identified in the DEIR is 35,704 new units. The comparison of these alternatives, therefore, is meaningless. 64

60. P. 5-2. The comparison of GPU3 and GPU5 is not based on the same assumptions. Table 5-2 identifies 13,675 new units as buildout for GPU3 and new 10,015 units as buildout for GPU5. As noted above, the real GPU5 buildout number is 35,704 new units. The comparison of these alternatives, therefore, is meaningless. 65  
 Also, the DEIR for GPU4 identified 21,666 units as buildout. Please explain the difference between the two buildout numbers for GPU3.

61. P. 5-27. The comparison of GPI and GPU5 is not based on the same assumptions. Table 5-2 identifies 13,974 new units as buildout for GPI and 10,015 new units as buildout for GPU5. As noted above, the real GPU5 buildout number is 35,704 new units. The comparison of these alternatives, therefore, is meaningless. 66

62. P. 5-40. The comparison of GPU4 and GPU5 is not based on the same assumptions. Table 5-4 identifies buildout for GPU4 as 16,900 and 10,015 units as buildout for GPU5. As noted above, the real GPU5 buildout number is 35,704 new units. The comparison of these alternatives, therefore, is meaningless. 67

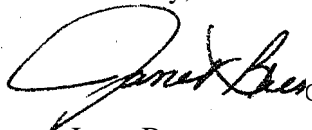
63. P. 5-53 This comparison is even more confusing. Table 5-5 identifies buildout for a TOD alternative and GPU5 as 21,600 units. Please explain the 21,600 units for GPU5. 68

CARMEL VALLEY MASTER PLAN

64. The DEIR should explain the 2092 buildout numbers in relationship to the Rancho Canada Village project including possible allowable densities, the Val Verde Drive project, and the Villas de Carmelo and the Rancho Canada plan for hotel/timeshare units and employee units and the Delfino proposal for residential lots. 69

Thank you for the opportunity to review the documents.

Sincerely,



Janet Brennan  
 President  
 LWV of the Monterey Peninsula



MaryEllen Dick  
 President  
 LWV of the Salinas Valley

