



Ruth Smith
 President
 Citizens for a Sustainable Monterey County
 PO Box 4060
 Monterey, CA 93940

Monterey County
 Planning and Building
 Inspection Administration

FEB 02 2009

RECEIVED
 Rec'd as GEQA
 Comments 2/1/09
 5:42 pm

February 1, 2009

Carl Holm and Monterey County Board of Supervisors
 County of Monterey
 Planning Salinas Permit Center
 168 West Alisal Street
 Salinas, CA 93901

Re: Draft Environmental Impact Report (DEIR) for General Plan Update 5 (GPU 5).

Dear Mr. Holm, and Supervisors Calcagno, Salinas, Armenta, Parker, and Potter,

Citizens for a Sustainable Monterey County (CSMC) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed General Plan Update (GPU) 5 and submits this letter as our formal comment on this matter.

The DEIR identifies significant and unavoidable impacts on agriculture, aesthetics, traffic, and water supply and water quality with implementation of the proposed General Plan. For all areas in which significant and unavoidable impact has been identified, CSMC strongly disagrees with the determination. The impacts are not unavoidable. Please see the specifics of our concerns below.

Global Warming. The DEIR fails to consider impacts of accelerated global warming, and is thus inconsistent with State Law. The State of California has committed to the following emissions reduction targets pursuant to AB32:

- to 2000 levels by 2010 (11% below business as usual)
- to **1990 levels** by 2020 (25% below business as usual)
- 80% below **1990 levels** by 2050.

How has Monterey County acknowledged the intent of AB32 and SB375 in its proposed GPU 5?
 What will be the increase in greenhouse gas emissions resulting from the proposed plan compared to **1990 levels**?

Traffic. The DEIR identifies traffic at Level of Service (LOS) E and F as significant and unavoidable. Increasing traffic congestion without adequate mitigation is inconsistent with California emissions reductions targets. You will find that increased walkable transit oriented development (TOD) would reduce the impact to a less than significant level.

The alternatives proposed in the DEIR have not adequately considered infill development and land use consistent with SB375. TOD maximizes infrastructure efficiency, primarily through daily transportation support infrastructure, with a focus on pedestrians, bicycles, scooters, and public transit. TOD minimizes single occupant vehicle trips by making

P . O . B O X 4 0 6 0 M O N T E R E Y , C A 9 3 9 4 0
 W W W . S u s t a i n a b l e M o n t e r e y C o u n t y . O R G

1
2
3

walkable design for pedestrians a priority, and emphasizing collector transport with quality high-density development with a mix of uses within walking distance of a centrally-located train and/or public transport station. It also maximizes the reduction of vehicle miles traveled. Unnecessary peak hour vehicle miles traveled as identified in the DEIR would result in negative air quality and climate change impacts that are in non-compliance with AB32 and SB375.

3

What is the residential unit capacity of infill development within County boundaries?
How many proposed residential units could be replaced by infill development?
Is the number of units enough to offset housing requirements?
What is the correlated effect on LOS for the roadways and intersections currently in exceedance of the threshold?

4

Agriculture. The Draft EIR identifies the loss of Important Farmland and Williamson Act land as a significant and unavoidable impact. However, the impact may be avoided by implementing land use consistent with SB375 and limiting additional housing units to the amount required to accommodate population increase minus the mean annual available housing units averaged over the past four years. (see also Transportation above)
How many acres of Important Farmland and Williamson Act land could infill development protect from conversion to non-agricultural uses?

5

By how many acres could the unavoidable impact to agricultural resources be lessened?

Water. Future growth anticipated by the 2006 General Plan would result in significant impacts to water quality and groundwater resources. Erosion associated with agricultural activities would result in sediment loading of streams and rivers, resulting in degraded water quality. Increased demands for potable water associated with future urban development may result in the exacerbation of existing groundwater overdraft and seawater intrusion problems. The use of ground- and surface-water for potable consumption could be reduced to a less than significant impact by considering some effective proven sanitary means for offsetting home water demand. Impacts would be substantially lessened by implementing rainwater catchment policy and limiting landscape watering to food-bearing plants only. Appropriate landscaping would maximize use of plants adapted for our region and climate zone, and should comprise greater than half of vegetation. In support, please review *Position Paper: Sustainable Water Management*, prepared by our affiliate Sustainable Pacific Grove in May 2008, downloadable at www.sustainablepg.org/sus_water.php.

6

By what percentage could water demand be reduced through implementation of simple water conservation devices, water catchment, and appropriate landscaping?

Thank you for your attention to the above matters.

We look forward to your response, and following this project through to consistency with State law.

Best regards,

Ruth Smith
President

- Cc: CSMC Board of Directors
- Sustainable Carmel Valley
- Big Sur Power Down
- Sustainable Pacific Grove
- Monterey Green Action
- Sustainable Seaside
- Sustainable Salinas

Calderon, Vanessa A. x5186

From: Megan Tolbert [m_tolbert2003@yahoo.com]
Sent: Sunday, February 01, 2009 5:42 PM
To: ceqacomments
Cc: Ruth Smith; Mark Folsom; Larry Telles; Robert Frischmuth; megan@montereygreenaction.com; Mark Folsom; George Wilson; Pierre & Virginia Chomat
Subject: Comment Letter on DEIR for GPU5 from CSMC

To Monterey County, Mr. Carl Holm, and the Monterey County Board of Supervisors,

Please find attached a comment letter on the Draft EIR for the proposed General Plan Update 5, submitted by Citizens for a Sustainable Monterey County.

Thank you,

Megan Tolbert
Vice President, CSMC
Director, Monterey Green Action

Monterey County
Planning and Building
Inspection Administration

FEB 02 2009

RECEIVED

rec'd as CEQA
comments 2/1/09
5:42 pm