



DEPARTMENT OF CONSERVATION

DIVISION OF LAND RESOURCE PROTECTION

S-2

801 K STREET • MS 18-01 • SACRAMENTO, CALIFORNIA 95814

PHONE: 916 / 324-0850 • FAX 916 / 327-3430 • TDD 916 / 324-2555 • WEBSITE conservation.ca.gov

February 2, 2009

VIA FACSIMILE (831) 757-9516

Mr. Carl Holm, Assistant Director
 Monterey County Resource Management Agency
 168 West Alisal Street, 2nd Floor
 Salinas, CA 93901-2680

Dear Mr. Holm:

Subject: Draft Environmental Impact Report (DEIR) for the 2007 Monterey County General Plan

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the DEIR for the referenced project. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's impacts on agricultural land and resources.

Project Description

The 2007 General Plan is a comprehensive update to the existing 1982 Monterey County General Plan providing goals and policies to guide future development and to preserve natural and agricultural resources from urban encroachment to 2030. The 2007 Plan covers all unincorporated portions of the County. The 2007 General Plan directs urbanization to incorporated cities and to designated Community Areas and Rural Centers. As maximum development potential is not expected to occur during the 2007 planning horizon, the Plan also provides analysis for longer-term full build out to 2092.

Important Farmlands

The DEIR states there are 236,142 acres identified as Important Farmland and 1,065,577 acres of grazing land. 763,396 acres are protected under Williamson Act contracts, Farmland Security Zone (FSZ) or other enforceable restrictions as of 2007. The DEIR does an admirable job of discussing the existing environmental setting. We suggest the following be included in the Final Environmental Impact Report (FEIR) related to changes in agricultural resources proposed by implementation of the 2007 General Plan.

The DEIR references that additional information pertaining to the Department's Important Farmland Mapping and Monitoring can be found under section 4.2.2 (see section 4.2.3.3, reference to regulatory framework). The reference is incorrect; the correct reference is 4.2.4.

Grazing lands are an important natural/agricultural resource in Monterey County. The Department suggests the FEIR include the Department's Monterey County Important Farmland Map. The 2006 Map is available at the Department's website and indicates the location of grazing lands in the County.

Monterey County
 Planning and Building
 Inspection Administration

FEB 02 2009

RECEIVED

Faxed 2/2/09

4:31 pm

1

2

Mr. Carl Holm, Assistant Director

February 2, 2009

Page 2 of 2

S-2

The DEIR indicates that implementation of the 2007 General Plan will result in the conversion of 2,571 acres of important farmland to urban land uses. Of this amount, 476 acres of important farmland are within incorporated cities Sphere of Influence. The DEIR states that conversion of the remaining acreage is most likely to occur in the Community Areas of Boronda, Castroville, Chualar and Pajaro. The Department recommends the FEIR include a table indicating the estimated breakdown of important farmland acreage figures per Area Plan. The table could be similar to Table 4.9-2 that indicates the approximate acreage of different vegetation types by Community Areas.

2

The Department supports the County's proposed policy to adopt and implement a program to mitigate for the loss of Important Farmland resulting from a change of land use designation or annexation. Until the program is established, the County may wish to consider that the California Farmland Conservancy Program is authorized to accept donations of funds if the Department of Conservation is the designated beneficiary and it agrees to use the funds for purposes of the program in a county specified by the donor.

3

Williamson Act Lands

The Department recommends that the County's more restrictive Williamson Act contract terms (20-year versus 10-year) be included in the discussion of Williamson Act contracts in Section 4.2.4.1. Additionally, we recommend that Exhibit 4.2.2 be replaced with the Monterey County 2007 Williamson Act Map. The map is available from the Department website and provides a comprehensive picture of the County Williamson Act prime and nonprime lands, Farmland Security Zone lands and lands undergoing nonrenewal of the contract.

4

The DEIR states that implementation of the 2007 General Plan will result in the conversion of 6,874 acres of Williamson Act land to urban uses. The DEIR also indicates that 299 of the 6,874 acres designated for conversion, are located within the Spheres of Influence of the County's incorporated cities. The Department suggests the FEIR breakdown the 6,874 acres to the number of Williamson Act prime and nonprime acres. Additionally, the FEIR could include a table that provides readers a breakdown of where conversion of Williamson Act acreage is expected, i.e. 40 Williamson Act prime acres in the City of Castroville.

Thank you for the opportunity to comment on the DEIR. If you have questions on our comments, or require technical assistance or information on agricultural land conservation, please contact Adele Lagomarsino at 801 K Street, MS 18-01, Sacramento, California 95814; or, phone (916) 445-9411.

Sincerely,



Dan Otis
 Program Manager
 Williamson Act Program

cc: State Clearinghouse