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March 14, 2006

Mike Novo
Planning and Building Services Manager
168W. Alisal St., 2nd Floor
Salinas, CA 93901

SUBJECT: NOP FOR DEIR FOR MONTEREY COUNTY GENERAL PLAN UPDATE

Dear Mr. Novo:

LandWatch Monterey County appreciates the opportunity to review and comment on the Notice of Preparation for the EIR for the proposed project. In addition to the traditional impact assessments, we offer the following comments on specific impacts that should be addressed in the DEIR.

Water Supply and Demand

1. The analysis should address the status of the Salinas Valley Water Project and projects to address water supply on the Monterey Peninsula. Water supply alternatives and impacts in the event water projects are not implemented in a timely manner should also be assessed.
2. The cumulative impact on the Salinas Valley Groundwater Basin should account for impacts from the General Plan Update as well as from buildout of the Greenfield, Soledad, Gonzales, and King City General Plans and the Chualar and Boronda area plans.
3. The water demand assessment should address water demand after accounting for recharge from irrigation and rain.

Traffic

4. We understand the AMBAG traffic model will be used to address traffic impacts. It should be noted that the model uses the most recent population forecasts which do not account for general plan buildout. Recently adopted general plans for Soledad and Greenfield show population growth significantly in excess of population forecasts.

Productive Agricultural Land

5. The cumulative impact on productive agricultural land should include the impacts of the proposed projects and general plan buildout of Salinas Valley cities and communities.

Air Quality

6. The cumulative impact on regional ozone levels should assess consistency of the population from the proposed project and from buildout of all general plans in Monterey County with the population forecasts included in the 2004 Air Quality Management Plan for the Monterey Bay Region.

Mitigation Measures

7. Per CEQA Guidelines, if mitigation measures would have significant adverse impacts, the effects of those impacts should be discussed.

Cumulative Impacts

8. While some specific recommendations regarding cumulative impact analysis are described above, it is important to note that CEQA requires an analysis of past, present, and probable future projects producing related or cumulative impacts including those projects outside the control of the County or a summary or projects included in adopted general plans or related planning documents. The list should include buildout of existing general plans.

Jobs/Housing Balance

9. The impact of the proposed project on the county's jobs/housing balance should be identified. The assessment should include estimates of residents out-commuting to surrounding counties and related impacts on traffic and air quality.

Thank you for the opportunity to comments on the Scope of Work for the proposed projects.

Sincerely,

Chris Fitz, Executive Director
LandWatch Monterey County