

March 24, 2005

Butch Lindley, Chair
Monterey County Board of Supervisors
Court House
Salinas, CA 93902

Subject: County General Plan Update

Dear Supervisor Lindley and Members of the Board of Supervisors:

The League of Women Voters of the Salinas Valley and the League of Women Voters of the Monterey Peninsula have reviewed the Community General Plan (CGP) and General Plan Update 3 (GPU3) as modified by the spin-off subset of the Refinement Group (RGP). Based on League studies at the State and local levels and adopted positions, we support the overall focus of the Community General Plan. Our specific comments follow:

1. The Leagues supported the 12 Guiding Objectives adopted by the Board of Supervisors. We believe the Community General Plan closely follows these objectives in contrast to the RGP.
2. The Leagues support involvement of citizens in the earliest planning and regulatory stages throughout the land use process. By early public notification of projects, limiting fees charged for appealing projects, and making Geographic Information System data readily available to the public, the Community General Plan furthers public participation. On the other hand, the RGP replaces the current structure of the County Planning Commission (comprised of 11 citizens appointed by the Supervisors) with five Commissioners appointed by the Supervisors and six appointed by a majority vote of the Supervisors from nominees submitted by the following groups: Monterey County Central Labor Council, Monterey County Hospitality Association, Monterey County Farm Bureau, Grower-Shipper Association of Central California, Monterey County Housing Alliance, and the Monterey County Agricultural Advisory Committee. This structure does not provide adequate representation from the general public throughout the County. It excludes environmental, public interest and land use policy groups and places important land use decisions primarily in the hands of major business interests.
3. The Leagues support action at all levels of government for the provision of affordable housing for all Californians. We support methods which can be used to cut housing construction costs and the use of density bonuses; mixed, cluster and inclusionary zoning; second units; infill development; air rights; and increased density along transportation corridors.

The Community General Plan supports land use practices that enable the production of affordable housing such as mixed use, higher density and infill development and requires that new housing projects provide at least 25% of new

units to be affordable to very low, low and moderate income households in perpetuity. On Fort Ord, the requirement is increased to 40%. When new commercial or industrial projects with 50 or more employees are approved, employers are required to help provide directly or indirectly for housing demanded by the new jobs. The first right to rent or purchase inclusionary housing would be to those who live or work in Monterey County. The Plan establishes a housing unit allocation system to encourage production of affordable housing in Community Areas and provides for equity sharing. The Refinement Group Plan retains the 20% inclusionary housing requirement of GPU3 and supports continuation of the same land use patterns (i.e., sprawl) that have been unsuccessful in producing affordable housing in Monterey County.

4. The Leagues support preservation of agricultural land as a limited resource which must be preserved for the economic and physical well-being of California and the nation. Appropriate agricultural land should be identified and its long term protection should be based on regulatory and incentive programs which include comprehensive planning, zoning measures and other preservation techniques.

The Community General Plan focuses growth into five unincorporated Community Areas and the cities, prohibits subdivisions in other unincorporated areas, accommodates development on existing legal lots of record, and minimizes regulations for on-going agricultural activities. In contrast the RGP identifies seven Community Areas, including Rancho San Juan, and 18 Rural Centers for development. It would allow more development on Rural Lands and Agricultural Lands than the Community General Plan. Overall, it is estimated that the Community General Plan would require conversion of less than 2,000 acres of agricultural land in contrast to the RGP which would consume over 10,000 acres of agricultural land.

5. The Leagues support a transportation system to move people and goods which includes a variety of transportation modes with emphasis on increased public transportation services and other viable alternatives to reduce vehicle miles traveled; is efficient, convenient, and cost effective; is safe and secure; serves all segments of the population and diverse geographic needs; minimizes harmful effects on the environment; is integrated with land use; and is supported by extensive public education.

The Community General Plan integrates transportation and land use planning by focusing growth in existing Community Areas and cities. Concentration of urban development more readily supports alternative transportation. Specifically, public transit and more frequent transit service are enabled when development is concentrated and compact. Mixed use and higher density development support pedestrian oriented and bicycle-friendly communities.

The Community General Plan supports specific roadway improvements and new roads needed to maintain safety and relieve congestion due to internal traffic conditions. In addition to those projects identified in the Community General Plan, the Leagues support inclusion of the Airport Blvd. interchange which is

needed to service the agricultural industry and improve safety conditions. By focusing on internal traffic conditions, the Community General Plan provides the best and most efficient use of limited transportation funds and addresses those traffic problems most affecting local residents.

The Community General Plan establishes performance standards which must be met prior to new development occurring, e.g. maintenance of Level of Service C for roads in Rural Areas and D in Community Areas with narrow exceptions where planned development in Community Areas would reduce traffic trips to maintain acceptable levels of service. Under the RGP roadway performance standards for development are reduced from Level of Service C to D in Rural Areas and D to E in Community Areas.

6. The Leagues support measures which promote the management and development of water resources in ways that are beneficial to the environment with emphasis on conservation and high standards of water quality that are appropriate for the intended use. More specifically, the Leagues support measures that coordinate water resource planning with land use planning and provide for future needs without encouraging unsustainable growth.

The Community General Plan includes new water supply projects that support planned growth and that do not have significant unmitigated impacts, including inducing unplanned growth. The Community General Plan requires water conservation measures for all new development and the use of reclaimed water where available. Projects with private water supplies would be required to prove the availability of a long-term, sustainable water supply. The RGP does not address new water supplies and questions the right of the County to verify sustainable water supplies for projects on private systems.

7. The Leagues support measures to establish air quality standards that will protect the public health and welfare and the development of effective enforcement and implementation procedures at each level of government to attain these standards.

The Community General Plan, by focusing growth into Community Areas and cities, encourages alternative transportation modes which reduce air pollution. Additionally, the Community General Plan maintains consistency with the 2004 Air Quality Management Plan (AQMP) by accommodating no more population growth than accommodated in the AQMP. This will help assure that the County meets and maintains health-based air quality standards. In contrast, the RGP accommodates a population of 45,000 persons in excess of that accommodated in the AQMP, jeopardizing progress in meeting air quality standards in the County.

8. The Leagues support growth management decisions that relate to and protect the overall quality of the environment, preserve open space and provide for adequate parks and recreation, integrate land use and transportation planning, provide for future needs without encouraging growth, and recognize the interrelationship of decisions relating to air quality, energy, land use, waste management and water resources.

The Community General Plan by requiring that infrastructure needed for new development be in place or built concurrently with the project assures that growth will be managed to protect existing and future generations. The RGP eliminates the critical safeguards in GPU3 which assured the availability of infrastructure for new development and provides for greater “flexibility” for development throughout unincorporated Monterey County. For example, under the RGP phasing is eliminated, and market forces would dictate order of development (p. 46, LU-3.2), the priority of development in Community areas would be driven by the market place (p.47, LU-3-5), and the infrastructure plan requirement of GPU3 is found to be too onerous and phasing would be market driven (p. 48-LU-3.7).

The Community General Plan, by directing growth into existing urban areas, preserves agricultural land and natural resources. Permit requirements for specified on-going agricultural operations are eliminated to help maintain agricultural uses. Development on slopes 25% or greater would be prohibited without a variance and cultivation of soil on land with slopes 15% or greater would be prohibited. Under the Refinement Group Plan, development on slopes 30% and greater would be allowed with a Use Permit and conversion of uncultivated land to cultivated land on slopes in excess of 30% would be allowed with an administrative permit.

Overall, by concentrating development in urban areas, the Community General Plan reduces taxpayers’ costs and maximizes the benefits of limited public funds which must be spent for infrastructure improvements. This approach is consistent with the economic report prepared for the County’s GPU which found that there was not enough funding available to support roads, highways and other public services required for low density, urban sprawl.

The Leagues have not studied and do not have positions on several goals and policies in any of the General Plans, including but not limited to policies related to the provision of living wages, enforcement, administration, and noise. As described above, however, the Community General Plan is far more consistent with League positions than the Refinement Group Plan, and we urge that its major provisions be incorporated into the County General Plan Update.

Thank you for your consideration.

Sincerely,

Nancy Green
Co-President
LWV of the Monterey Peninsula

Anne Herendeen
President
LWV of the Salinas Valley