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November 2, 2010

Simon Salinas, Chair
Monterey County Board of Supervisors
168 West Alisal Street
Salinas, CA 93901

Re: GPU 2010 Implementing Ordinances

Dear Chair Salinas and Board Members:

LandWatch reviewed the General Plan Implementation Matrix which describes the programs needed to implement the General Plan. Because most of the implementation measures do not include completion dates, we have identified the following programs which we believe are most important and require early implementation. Further, we urge you to assign priorities and establish a schedule for all implementation measures. Also, note the following two programs are not completely addressed in the matrix (see underlined portions):

OS-5.19 The County shall, in concert with the U.S. Fish and Wildlife Service, California Department of Fish and Game, cities in the Salinas Valley, and stakeholders develop a conservation strategy for the Salinas Valley to provide for the preservation of adequate habitat to sustain the San Joaquin kit fox population... The County shall complete the conservation strategy within four (4) years of General Plan adoption. The conservation strategy funding program shall be developed and shall consider a Monterey County General Plan Conservation/Open Space Element C/OS-11 mitigation fee program for which development projects will be assessed a fee based on a proportional basis of impact to the San Joaquin kit fox as one of the options.

OS-5.21 At five year intervals, the County shall examine the degree to which thresholds for increased population, residential construction, and commercial growth predicted in the General Plan EIR for the timeframe 2006-2030 have been attained... The County shall complete the preparation of a conservation strategy for those areas containing substantial suitable habitat for those plant and wildlife species for which a biological report would be required pursuant to *Policy OS-5.16* due to development....] The conservation strategy shall also cover preservation of sensitive natural communities, riparian habitat, and wetlands, and wildlife movement corridors and include mechanisms such as on and off-site mitigation ratios and fee programs for mitigating impacts or their equivalent.

Priorities for implementation of Open Space Element Policies

OS 3.5 Discretionary Ag Permit Process for Cultivation on Steep Slopes
 OS 3.9 Erosion Program – Hillside Conversion
 OS 5.19 Mapping Kit Fox Habitat and preparation of a conservation strategy.
 OS 5.22 Stream Setback Ordinance
 OS 5.23 Oak Woodland Policies
 OS 10.11 Greenhouse Gas Reduction Plan Assessment. We recommend that the plan integrate SB 375 requirements.

Priorities for Land Use Issues

LU 9.1 Work Program to Update Title 21
 OS 1.4 Ridgeline Development Criteria
 LU 9.6 and 9.7 Criteria for General Plan Amendments
 LU 1.19 Development Evaluation System
 LU 9.2 Guidelines for Cultural Resource Protection
 C 5.3 Guidelines to Protect Scenic Highway Corridors
 LU 2.24 Adoption of Community Plans

Priorities for Implementation of Capital Improvement and Finance Plan with Adequate Public Facilities

C 1.2 Develop County Traffic Impact Fee
 PS 1.2 Complete Capital Improvements Financing Plan including guidelines for Winery Corridor Program

Priorities for Policies Related to Agriculture

AG 1.12 Ag Conversion Mitigation Program
 LU-2.8 Ag Buffer Criteria
 AG 3.3 Routine and Ongoing Ag Ordinance
 AG 2.1 Ordinance Defining Agricultural Activities Requiring Discretionary Permits

Priorities for Implementation of Public Service Policies

PS 3.2 Criteria for Proof of Long-Term Water Supply
 PS 3.15 Planning for Additional Water Supplies for the Salinas Valley
 PS 3.7 Program to Eliminate Overdraft of Water Basins as part of the CIFP
 PS 2.8 Runoff Performance Standards and Drainage Design Manual
 PS 3.15 Guidelines and Procedures for conducting water supply assessments
 PS 3.10 and 3.11 Ordinance Identifying Conservation Measures Reducing Agricultural and Potable Water Demand
 PS 3.13 Guidelines for Water Supply Assessments

Many of these policies will require substantial consultation with independent experts, e.g., implementation of the program to address cumulative impacts of hillside conversion under Policy OS 3.9 or development of a permitting process for slope development and agricultural conversion under OS 3.5. We urge the County to begin an open RFP process that can be used to locate relevant expertise in sufficient time to meet the County's implementation priorities.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. White". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Amy L. White
Executive Director