

Aug 16, 2024

Chair Glenn Church
Monterey County Board of Supervisors
PO Box 1728
Salinas, CA 93902

RE: Recommendations to better align Monterey County's Housing Element and General Plan

Dear Chair and Board of Supervisors Members:

LandWatch recommends changes in the County's draft Housing Element to better align the proposed opportunity sites with the County's adopted General Plan. Specifically, we urge the Board to direct staff to remove sites 1, 2, 24, 25, 26, 40, 47, 48, and 52:

- **Sites 1 and 2** involve extensive development on agricultural land. The sites are not within a highly developed area and have a correspondingly low TCAC score. They are outside of the community areas and rural centers designated under the 2010 General Plan Update.
- **Site 24** also involves extensive development on agricultural land and has a low TCAC score of 8.
- **Sites 25 and 26** consist of sprawl development in Chualar, also on agricultural land, and with a low TCAC score of 12.
- **Site 40** involves development of forested area and environmentally sensitive natural habitat.
- **Site 47** should be removed because it is environmentally sensitive natural lands on the former Fort Ord. The development consists primarily of market rate housing. SB 2295 doesn't apply because it's a private school. Therefore, York does not have the right to develop this parcel without rezoning, and rezoning is not appropriate in this location because it is on environmentally sensitive lands. Moreover, there is no water to serve additional housing development on the former Fort Ord under the settlement agreement between Marina Coast Water District, LandWatch and Keep Fort Ord Wild.
- **Site 48**, on Sill Rd., would consist of development in an environmentally sensitive area that was previously the subject of litigation - litigation which ultimately halted the

development. According to the County's site map, it has a TCAC score of 0. The County Housing Element should not facilitate more market rate housing on environmentally sensitive open space. Rather, it should encourage infill development near urban areas.

- **Site 52** involves development of farmland. There are plenty of other sites in Pajaro, for example, sites 48-51, so this one is not needed.

If these sites are removed, it would reduce the total unit number from 6,092 to 4,698, a number that is still well above the RHNA target of 3991, including a 20% buffer, in total and across every income category.

Throughout the Housing Element update process, starting with AMBAG's RHNA allocation process, LandWatch has sought to focus development in urban areas, principally Peninsula cities, where housing can be located near jobs, transportation corridors, public and private services, and adequate infrastructure, including water supplies and wastewater treatment. Fundamentally, this is the definition of sustainability and smart planning. Minimizing the number of climate-damaging sprawl housing units in non-urbanized areas of Monterey County and reducing policy and legal conflicts with the 2010 General Plan Update remain what we hope are shared goals with the County.

Indeed, the County of Monterey joined LandWatch in urging AMBAG to minimize the number of units allocated to the unincorporated area. Proposing thousands more units than needed to meet the RHNA that AMBAG did eventually allocate to the unincorporated area unaccountably reverses that policy judgment.

LandWatch therefore continues to be concerned by the inclusion of the sprawl sites we identify - sites that eat up more farm and natural lands, that are far removed from high resource areas, that will result in long commutes and increased GHG emissions, that lack adequate infrastructure, and that are in conflict with the County's 2010 General Plan.

Thank you for your consideration.

Regards,

A handwritten signature in black ink, appearing to read "Michael DeLapa". The signature is stylized and cursive.

Michael DeLapa
Executive Director

SPRAWL AND OTHER INAPPROPRIATE SITES TO REMOVE FROM COUNTY'S UPDATED HE														
New Site	Old Site	APN	County Planning Area	Site Address	Existing Zoning	Very Low Income Units	Low Income Units	Moderate Income Units	Above Moderate Income Units	Total Units	TCAC	Reason for Removal	Outside a highly developed area (i.e., sprawl)?	Subject to previous litigation?
1	5	113-161-018-000	Bolsa Knolls	Russell RD	F/40	146	96	59	154	455	12	area, not suitable for affordable housing bc not in a high resource area	Y	
2	6	113-161-019-000	Bolsa Knolls	55 RUSSELL RD	F/40	22	14	9	22	67	11	see above	Y	
24	32	161-011-074-000	Toro	18900 PORTOLA DR	F/40	47	31	19	49	146	8	farmland/ sprawl development - "from HE site description: The County believes that portions of the site could be developed into lower-income housing due to the Highway 68 and Reservation Road Affordable Housing Overlay (2010 General Plan) "	Y	
25	33	145-151-001-000	Chualar		PQP	3	3	5	46	57	12	farmland/ sprawl development - not opposing 27 and 28 Chualar sites because infill	Y	
26	34	145-161-085-000	Boronda		HDR/10	1	1	1	9	12	12	farmland/ sprawl development - not opposing 27 and 28 Chualar sites because infill	Y	
40	54	008-151-002-000	Monterey	AGUAJITO RD	RDR/5.1-UR-D-S	137	90	56	146	429	24	forested area	N	
47	75	031-131-006-000	Fort Ord Master Plan	9501 YORK RD	PQP-D-S	9	9	13	29	60	20	former Fort Ord; SB 2295 n/a	N	
48	N/A	412-073-002-000	North County	100 SILL RD	MDR/4 (CZ) and CGC(CZ) [split zoned parcel]	2	2	3	30	37	0	previously subject of litigation		Y
52	N/A	117-381-030-000	Pajaro	PAJARO RIVER	RC/40 and F/40	8	8	10	105	131	0	Farmland. There are plenty of other sites in Pajaro (48-51), so this one is not needed		
Total Units Removed						375	254	175	590	1394				
						Very Low Income Units	Low Income Units	Moderate Income Units	Above Moderate Income Units	Total Units				
Total Before Sites Removed						1,826	1,277	946	2,043	6,092				
Total After Removed						1,451	1,023	771	1,453	4,698				
County RHNA						1,070	700	420	1,136	3,326				
20% Buffer						214	140	84	227	665				
Subtotal						1,284	840	504	1,363	3,991				
Excess RHNA Capacity After Sites Removed						167	183	267	90	707				