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April 21, 2006

Jerry Smith, Chair
Monterey County Board of Supervisors
168 West Alisal Street
Salinas, CA 93902

Subject: Request for Build-Out Data for GPU4

Dear Chair Smith and Members of the Board:

LandWatch Monterey County is reviewing the latest draft of the General Plan (GPU4). The purpose of this letter is to request "build-out" data for GPU4. An adequate analysis requires data on projected residential, commercial, and industrial development accommodated under the Plan. These buildout estimates should be included in the General Plan itself, but they are not. A General Plan that does not contain these data is seriously flawed. Build-out data are vital to assessing the adequacy of the Circulation and Conservation Elements, the Noise Element, the Open Space Element and, obviously, the Land Use Element. Such estimates are also essential to assessing consistency among the Elements, quantifying future water demands, and estimating the increment of change in traffic volumes and other circulation issues associated with the build-out identified and anticipated in the General Plan.

LandWatch and other members of the public interested in participating in the General Plan Update will be unable to adequately participate until such essential information, currently missing from the Draft document, is provided. Build-out data and associated policies are the most fundamental components of a general plan; the Draft currently available to the public is fundamentally insufficient and constitutes less than half the basic content and information required in a sound and fully integrated general plan. This is particularly troubling since certain Area Plans appear to permit unrestricted growth, and the Draft Plan eliminates maximum densities shown on the 1982 land use maps.

The Plan does not yet and should identify the number of units and developable acreage for the following:

- The 29 property owner requests.
- Projects that have been approved but not yet built.
- Projects that are in the permitting process.
- New units accommodated in Area Plans and Community Areas including Chualar, Rural Centers, Rural Center Transition Zones and all other land use categories which allow residential, commercial and industrial development.

These data are basic and very fundamental for any general plan. General plans need to identify the full build-out of the plan, so that the EIR process can adequately assess the environmental consequences of that build-out.

We request that this information be provided as soon as possible so that we may continue our review. This essential information should not be deferred until the EIR is prepared. If deferred until the EIR is available, we must provide advance notice to the Board that a minimum 45 day review period clearly will not be adequate to meet CEQA requirements for “meaningful public participation”. Additionally, if compilation of data is deferred to the DEIR, the County should explain how the General Plan will be revised to incorporate new density/build-out information and plans for recirculation of the Plan.

Finally, we urge the County to refer GPU4 Area Plans to the LUACs for review and comment, particularly since there have been major changes to these plans since GPU3.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Fitz".

Chris Fitz, Executive Director
LandWatch Monterey County