

August 15, 2006

Mayor Anna Caballero and Salinas City Council
Salinas City Hall
200 Lincoln Avenue
Salinas, CA 93901

RE: Monterey County General Plan – GPU4

Dear Mayor Caballero and Council Members:

For the last several years Monterey County has pursued aggressive growth within the sphere of influence of the City of Salinas. Projects approved by the County will adversely affect the City and its residents for many years to come. To its credit, the City of Salinas has taken strong stands opposing Monterey County's irresponsible plans within the City's sphere. The County's failure to work with the City in good faith has forced the City to resort to litigation, which, after several years, remains unresolved.

The fourth draft of the Monterey County General Plan Update (GPU4) will result in the urbanization of thousands of acres of unincorporated lands on the outskirts of the City of Salinas. It's a plan for sprawl that will guarantee gridlock, water problems and economic hardship for the city.

The purpose of this letter is to encourage you to maintain your diligent stand, protecting the City of Salinas from the irresponsible growth directly impacting Salinas, as proposed by the County in GPU4. This letter addresses concerns that I hope you will continue to address during the public review of GPU4. I have attached a letter to the Monterey County Planning Commission, detailing our concerns about GPU4.

ROADS

Disregarding Salinas' historical objections to, and pending lawsuit against, Rancho San Juan, GPU4 designates Rancho San Juan a Community Area, guaranteeing premature urbanization north and east of Salinas. Urbanization of Rancho San Juan will extend far beyond Butterfly Village. As project opponents have long asserted, Butterfly Village always has been, and still is, the first phase of Rancho San Juan. The following policies show the County's intent:

- LU-2.20 states the County shall establish and emphasize Community Areas as the preferred location for additional development in the County to support a mix of land use types at an urban level.
- LU-2.23 identifies Rancho San Juan as one of seven Community Areas. The policy says that the maps for the Community Areas "may be modified through the Community Plan/Specific Plan process."

- Figure 10 is the Land Use Map for the Greater Salinas Area and it designates urban uses for the Rancho San Juan lands surrounding Butterfly Village – Low-density Residential, High-density Residential, Commercial and Industrial.

Traffic impacts of this level of development will result in deterioration at 12 Salinas intersections to **Level of Service F – GRIDLOCK**. There is no funding to mitigate the traffic impacts which Rancho San Juan will guarantee. Measure A, TAMC’s transportation sales tax failed at the polls in June. Even if it had passed, Measure A contained NO funding for CONSTRUCTION of traffic capacity improvements in the 101 corridor between Salinas and Prunedale. TAMC’s Nexus Study for a Regional Development Impact Fee reveals that sprawl has outstripped, by \$712 million, our ability to pay for the roads to support it.

Instead of reining in sprawl, GPU4 will accommodate and exacerbate the negative impacts of sprawl by lowering levels of service standards on county roads from LOS C to LOS D and then allowing further deteriorations of that standard. The following policy clarifies this outcome:

- C-1.1 states that the acceptable level of service for County roads and intersections shall be Level of Service (LOS) D, except as follows:
 - a. Acceptable level of service for County roads in Community Areas may be reduced below LOS D through the Community Plan process.
 - b. County roads operating at LOS D or below at the time of adopting this General Plan shall not be allowed to be degraded further except in Community Areas where a lower LOS may be approved through the Community Plan process.

GPU4 does not contemplate or address the impacts to adjacent and surrounding areas of allowing levels of service within Community Areas to fall below LOS D. These impacts will be born, in large part, by the City of Salinas.

GPU4 does not require achievement of the new lower LOS until 2026 and defers addressing project funding to Capital Improvement and Financing Plans (CIFP), which will be developed AFTER adoption of GPU4 (C-1.2). The problems will exacerbate and the county will do nothing to mitigate them for 20 years.

GPU4 does not address impacts to regional road corridors except to say that the county will seek funding for improvements to regional corridors from TAMC and other available resources (C-1.7).

WATER

Under GPU4, the urbanization of rural lands in the Salinas Valley would imperil the water supply for the City of Salinas. Since voters approved it in 2003, the Salinas Valley Water Project has been used to justify approval of all county developments in the Salinas Basin, including Rancho San Juan. According to two separate court judgements, there is “no agreement as to when, and if, the Salinas Valley Water Project will be completed.”

If the Salinas Valley Water Project is not built, water pumping throughout the Salinas Basin would need to be reduced by 30% to 50% (Salinas Valley Water Project EIR/EIS pages 2-6). Even if the Salinas Valley Water Project is built, the project EIR/EIS states that salt water intrusion will be halted **ONLY** in the near term, **AND** that by 2030 an expanded distribution system would be necessary to halt salt water intrusion. (page 2-3, SVWP EIR/EIS). An expanded distribution system, which has not been proposed to or approved by voters, would cost \$41.8 million not including costs for environmental mitigation or operation and maintenance costs. (page 2-3, SVWP EIR/EIS).

Concerns about water supply and water quality are substantiated by water providers. In 2004, California Water Service Company applied for rate increases in its Salinas District. The company requested increases totaling 62% over a three-year period, citing “increased plant investment resulting from water quality and water supply concerns.” (Excerpts from California Water Service Company’s PUC application.)

GPU4 policies provide no real protection from existing or future water constraints. Here are some examples of the weak and hollow policy statements in GPU4:

- To prevent overdrawing the water table, coordination with public water service providers drawing from a common water table is merely “encouraged” (PS-2.1), rather than “required.”
- The Water Resources Agency will monitor wells in areas experiencing rapid growth providing “adequate funding mechanisms for monitoring are established” (PS-2.2), instead of requiring monitoring wells be in place as a criterion for new development approval.
- Proof of a long-term water supply is required (PS-3.1) but the time frame is 20 years – less than the term of most mortgages. Furthermore, the parameters for determining “long-term water supply,” which are to be established after adoption of GPU4, are vague and will be applied on a case-by-case basis (PS-3.3).
- PS-3.3 also offers a *promise* that “specific criteria for proof of a long-term sustainable water supply for new development ***“shall be developed.”*** **It does not assure that water supplies will be secured prior to or concurrent with development.** The policy goes on to identify criteria that *may* include but are not limited to:
 - a. Water quality,
 - b. Production capability
 - c. Recovery rates,
 - d. Effect on wells in the immediate vicinity,
 - e. Existing groundwater conditions,
 - f. Technical, managerial and financial capability of the water purveyor.”

Clearly a responsible plan should require a long-term sustainable water as a precursor to new growth, with clearly defined criteria, as a fundamental part of the General Plan, rather than making hollow promises to develop a sustainable supply at some undefined time in the future.

The City of Salinas has planned for significant growth over the next 20 years. Whether or not the Salinas is able to manage that growth and protect the quality of life of current and future residents, will depend on its efforts to stop Monterey County from growing irresponsibly within the City's sphere of influence.

Thank you for considering our views.

Very truly yours,

/S/ Chris Fitz

Chris Fitz, Executive Director
LandWatch Monterey County

cc: Carl Holm, Monterey County, and interested parties