



LandWatch
monterey county

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April 7, 2003

Mary Orrison, Planning Service Manager [Sent By FAX: (831) 899-6211]
City of Seaside, Community Development Department
440 Harcourt Avenue
Seaside, CA 93955

RE: Comments on Notice of Preparation of Draft Program EIR
Project: City of Seaside General Plan

Dear Mary Orrison:

I am responding to the above-noted Notice of Preparation, dated February 28, 2003. The Notice of Preparation indicates that the comment period on the NOP ends on April 8, 2003. The undersigned is the contact person for LandWatch Monterey County.

Please provide me with notice of all future actions relating to the proposed project, which you describe as "the comprehensive update and implementation of the City of Seaside General Plan." I am also requesting notice of all actions under the California Environmental Quality Act relating to the proposed project.

Our comments are as follows:

1. It is not possible properly to prepare an Environmental Impact Report without having a specific "project" upon which to prepare the EIR. In this case, no draft General Plan Update has apparently been prepared as yet. (If I am wrong about this, please let me know immediately how I can obtain a copy of the draft General Plan Update which is the "project" at issue here).
2. Because there is, as yet, no specific project to review, it is impossible to specify with any certainty what sort of environmental analysis will be necessary. Attachment B, which purports to provide a "detailed description" of the proposed project, does no such thing. The attachment is simply a general statement of the topics that the City intends to cover as it prepares a General Plan Update. LandWatch believes that members of the public – and the responsible and trustee agencies to which you have circulated the Notice of Preparation — do not have an adequate basis upon which to comment on the required scope of the EIR.
3. LandWatch urges the City of Seaside to prepare a draft General Plan Update document in advance of environmental review, and to hear from the public prior to making decisions about what, specifically, ought to be included in the City of Seaside General Plan Update.

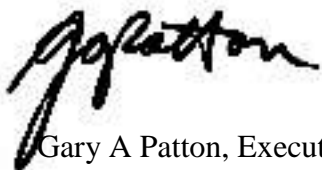
After a draft GPU is prepared, which includes all of the required elements specified in state law, and any optional elements proposed to be included by the City, it will then be possible to undertake appropriate environmental analysis, because the specifics of the proposed project will be clear. If the process is carried out in this way, members of the public, and responsible and trustee agencies, will be able to comment thoughtfully and helpfully on the scope of the EIR review required. In addition, of course, this type of process will allow members of the public to comment prior to adoption of the draft GPU upon which the environmental analysis will be conducted. We believe that the General Plan Update process will be much improved if it is carried out in this manner.

4. A process in which a consultant, or city staff, concurrently prepares both a draft General Plan Update and a draft Environmental Impact Report, releasing both documents simultaneously, will give members of the public less chance to comment on the possible alternatives at the start of the process. If comments are received after the draft GPU is available that lead to a revision of the draft General Plan Update—and LandWatch believes that this is likely—then the process will probably take substantially more time, and cost more, than if the “project” were relatively certain, prior to the initiation of environmental review.
5. We agree with the findings of the Initial Study that the adoption of an updated General Plan might have a significant effect on the environment, and that a full EIR is required.

In conclusion, we urge the City of Seaside to maximize public participation, and to provide for a more adequate (and probably less costly) environmental review, by making initial decisions on what should be included in the draft General Plan Update prior to commencing environmental review.

Thank you for taking our comments into consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "G. Patton", with a stylized, flowing script.

Gary A Patton, Executive Director
LandWatch Monterey County

cc: Members, LandWatch Board of Directors