



February 26, 2024

Supervisor Glenn Church, Chair  
Monterey County Board of Supervisors  
168 West Alisal St., 1st Floor  
Salinas, CA 93901  
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Subject: LandWatch Monterey County's Comments for Agenda Item #28 Regulations to Mitigate for Development on Farmland

Dear Chair Church and Members of the Monterey County Board of Supervisors:

I write to request an additional change to the proposed ordinance.

1. Base mitigation ratio should be lowered even more for a conservation easement or deed restriction on permanent growth boundaries.

The staff report proposes to lower mitigation ratios by 0.125 off the base mitigation ratio for four kinds of priority mitigation areas: high potential groundwater recharge areas, water quality improvement projects, along the exterior boundary of CARCAHOs, and the exterior boundary of permanent growth boundaries and permanent agricultural edges as identified in Board of Supervisors approved City and County Memorandum of Agreements and Memorandum of Understandings.

However, we recommend an even lower ratio be applied to one category: the exterior boundary of permanent growth boundaries and permanent agricultural edges as identified in the Board of Supervisors approved City and County Memorandum of Agreements and Memorandum of Understandings. Preservation of these lands is critical to implementing these permanent growth boundaries. Furthermore, the cost of mitigation is likely to be higher for these lands because they are in the expected path of growth, notwithstanding the City-County MOUs or MOAs. Thus, we recommend that the mitigation ratio for this category of priority land be reduced by 0.250 off of their base mitigation ratio.

2. Base mitigation ratio should also be lowered for development in growth areas.

The General Plan designates three kinds of growth areas in which future development should be directed: Community Areas, Rural Centers, and Affordable Housing Overlays. Conversely, future development should be discouraged outside of these growth areas.

To provide greater incentives to focus growth in these growth areas, we recommend that the base mitigation ratio be lowered by 0.125 for development in these areas. Doing so will encourage developers to consider these areas first for future projects.

Thank you for the opportunity to comment.

Regards,

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

Michael DeLapa  
Executive Director