LandWatch monterey county

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September 20, 2010

Bill Farrel, AICP
Interim Community Development Director
City of Gonzales
P.O. Box 647
Gonzales, CA 93926

SUBJECT: DEIR FOR GONZALES 2010 GENERAL PLAN

Dear Mr. Farrel:

LandWatch has had an opportunity to review the DEIR for the Gonzales 2010 General Plan. We have the following comments.

1. Project Description

The proposed general plan would encompass 19,200 acres which includes 2,150 acres for new urbanization and 2,130 acres for urban reserve. The balance is intended to continue as unincorporated agricultural and open space land. Buildout is estimated at 37,825 persons by 2050, an increase of 28,800 persons from January 1, 2009, and an additional 24,000 persons after 2050 (p. 3-9).

The data in Figure 3.2.1 provide a Summary of the Project. The data in Figure 3.2.3 show Existing Land Use (p. 3-13) and Future Land Use with Buildout (p.3-14). The two sets of data are inconsistent. For example, Figure 3.2.3 shows vacant acres for Existing Land Use of 1,640 for residential uses, 160 acres for commercial uses, 330 acres for manufacturing uses, 320 acres for Pubic Uses, 70 acres for parks and open space, and 2,130 acres for Urban Reserve for a total of 4,650. In contrast, Figure 3.2.1 shows 365 acres remaining for development under the 1996 Plan and 96 acres for commercial and industrial development with a total of 4,465. Additionally, 130 acres is identified for Parks and Open Space for the project (p. 4-261) in contrast to the 70 acres identified in Figure 3.2.3. Communication with Bill Farrel, Planning Director, indicates that the data in Figure 3.2.3 reflect the proposed project. Please clarify the data in the two figures and identify a complete set of data for all land uses for the project.

Figure 3.2.1 (p. 3-9) shows a total of 2,525 acres within the Urban Growth Area as vacant land for urbanization and 2,130 acres within the Urban Reserve. Ninety six (96) acres would be used for commercial and industrial uses within the Urban Growth Area and 67 acres within the Urban Reserve (Figure 3.2.1). Figure 3.2.1 does not include acreage for residential use; however, using data in Figure 3.2.2 (p. 3-14), 1,692 acres would be

needed to accommodate the projected housing within the Urban Growth Areas and 1,450 acres within the Urban Reserve. (e.g., acreage calculated as follows: 1,692 x 65% x 7 du/ac=7,700 DU). This leaves 727 acres unidentified for urbanization within the Urban Growth Area and 613 acres within the Urban Reserve (e.g., 2,515 acres minus 96 acres for commercial/industrial minus 1,692 acres for residential). Please identify land uses for these unidentified acreages. (Note, that if the DEIR is going to reference tables as "Figures" throughout the document that it do so in all cases including "Tables" 4.4.5 and 4.4.7.)

2. Population and Housing (p. 4-19)

The DEIR identifies buildout population of 37,825 persons by 2050. AMBAG forecasts show 23,418 persons by 2035. The letter from AMBAG regarding consistency of the project with the 2008 Air Quality Management Plan (Appendix B) states, "...total build out population for Gonzales by 2030 is 37,825 people. According to the Monterey Bay Area 2008 Regional Forecast, Gonzales will have 20,941 people by 2030. While the build out population exceeds the forecast total for the City of Gonzales, it does not push the region over the region's forecast population for 2030." LandWatch requested data from AMBAG to support the finding but has received no response to-date. The attached table was developed by LandWatch staff (Attachment 1). It shows 2035 population forecasts in General Plans for all jurisdictions in Monterey County exceed the AMBAG 2035 forecasts by over 100,000 persons and that General Plan buildout exceeds the AMBAG 2035 forecasts by more than one-quarter million persons.

The DEIR finds that increased rates of growth in Gonzales could result in a net increase in population growth for the region but this alternative scenario is considered unlikely because, "...AMBAG population projections are developed in coordination with the California Department of Finance (DOF) using a methodology unconstrained by local plans and infrastructure capacity..." The AMBAG Monterey Bay Area 2008 Regional Forecast report (p. 62) states, to the contrary:

> Land use and other regulatory constraints are implicit in the supply assumptions and within the 2008 Regional Forecast, were identified through consultation by FTAC members". See also the Appendix: Summary of Growth Constraints. The misrepresentation of how AMBAG forecasts are developed requires that the findings regarding growth inducement be revised.

The DEIR findings should be revised based on correct information.

3. Agricultural Resources (p. 4-29).

The DEIR shows about 7,000 acres of Prime Farmland and Farmland of Statewide Importance property in the planning area but outside the Urban Growth and Urban Reserve areas. There are 2,110 acres of Prime Farmland and Farmland of Statewide Importance in the Urban Growth Area and 1,380 acres of similar land and 460 acres in an animal feedlot in the Urban Reserve area (p. 4-36). The DEIR finds the impact on Agricultural Resources significant and unavoidable (p. 4-36). However, the DEIR finds the project's impact on conversion of agricultural land within the Urban Reserve area to be less than significant because of policies preventing conversion of agricultural land within this area "for the duration of the planning period" (p. 4-47). Since the land would

ultimately be converted to non-agricultural uses at some future date, the impact should be found to be **significant and unavoidable.**

There are 160 acres of land under the Williamson Act in the Urban Growth Area (p. 4-29). Even though the proposed General Plan would conflict with a Williamson Act contract for which a non-renewal notice has been filed, the DEIR finds the impact less than significant with mitigation measures. Additionally, adoption of the Gonzales General Plan would conflict with existing County zoning for agricultural use which would be significant under the DEIR's Thresholds of Significance (p. 4-35). The proposed mitigation measure is to work with Monterey County to establish an urban reserve area around Gonzales that corresponds with the Gonzales General Plan. The mitigation measure does not address the Williamson Act conflict. Further, changing zoning to be consistent with the Gonzales General Plan renders the threshold of significance meaningless. The impacts should be found to be **significant and unavoidable**.

4. Transportation/Traffic

The DEIR states, "…projected population and employment data for the Urban Growth Area was integrated into the regional traffic demand model developed by the Association of Monterey Bay Area Governments (AMBAG)…" Footnote 11 states, "…Use of the 2004 population and employment forecasts within this analysis therefore represents a conservative approach to this analysis…" (p. 4-81). Based on this footnote, it appears that AMBAG's 2004 forecasts were used rather than the projected population for the Gonzales General Plan as stated. Further, AMBAG's 2004 forecast only goes to 2030 with a forecast of 29,154. This is in contrast to the 2035 General Plan forecast of 37,825. Please explain if in fact General Plan forecasts were used in the AMBAG model, and if not, how the model was revised to reflect the General Plan's 2035 forecast. Also, note that the correct Appendix for traffic information is C, not D as stated (p. 4-81).

The DEIR states (pp. 4-101 and 4-102), "… Finally, the *Gonzales 2010 General Plan* indicates that the City is encouraged to avoid overbuilding streets with more lanes than are needed in the relatively short term (i.e., 10 years). This should help minimize the number of multi-lane intersections, which could pose a hazard to pedestrians."

While the overbuilding of street would mitigate pedestrian hazards as noted above, the General Plan proposes the construction of a six-lane road on 5th Street and Johnson Canyon Road. This is evidence of the failure of the General Plan as written to effect significant change in transportation infrastructure. On the one hand there is the above GP language to "encourage" avoiding overbuilding roads and on the other hand the General Plan recommends that 5th Street and Johnson Canyon Road be expanded to six-lanes. Furthermore, the proposed six-lanes would preclude roundabouts as a "first option" and result instead in massive signalized intersections where there would be up to 10 lanes (e.g., 6 through lanes and left and right turn lanes; roundabouts cannot physically (or logically) match up to six lanes (See air quality discussion of roundabouts below). Please address the conflict between these two policies as well as the impacts of constructing a six-lane road as required by CEQA.

The DEIR (pp. 4-106 and 4-113) identifies Implementing Action CIR-8.1.3 – Bicycle Parking: "Require major commercial development, employment centers, and public facilities to include provisions for safe and secure bicycle parking." All-weather protection is necessary to encourage people to ride bikes year around. Parking protection for bicycles should be addressed as a feasible mitigation measure.

The DEIR (pp. 4-106 and 4-114) identifies Implementing Action CIR-8.1.8 – Grant Funds for Bicycle Facilities: "The City shall, as appropriate, apply for grant funds for bikeway improvements (e.g., Transportation Development Act funds) when planning or implementing major circulation improvements." Since grant funds are very limited for bicycle facilities, requiring developers to fund bike facilities should be evaluated as a feasible mitigation measure.

Cumulative Traffic Impacts: The DEIR states, "…other sections of Highway 101 in Monterey County would also operate deficiently in the future…The addition or traffic from the buildout of the General Plan Urban Growth Area would result in impacts to many road segments between Greenfield and Prunedale. However…the impacts to these regional freeway segments would not rise to the level of requiring additional roadway upgrades beyond that which would be required without buildout of the Urban Growth Area. This is because the total amount of traffic growth on these non-local freeway segments would diminish in proportion to the distance from Gonzales." Thus, on the one hand the DEIR finds project traffic would result in impacts to Highway 101 and on the other hand, traffic improvements would be needed with or without buildout of the Gonzales General Plan. (p. 4-87). Later, the DEIR finds the project's cumulative impact on the regional circulation system is insignificant.

The cumulative impact analysis finds, "As development occurs, both within the City and throughout the County, traffic volumes on the regional circulation system would increase and may exceed the capacity of various roadways. Implementation of the General Plan and the mitigation measures proposed in this EIR would reduce traffic impacts. In addition, TAMC's Regional Traffic Impact Fee is designed to fund regional transportation improvements. Together, these measures would ensure that regional (i.e., cumulative) traffic impacts are less than significant." (p. 5-9)

Table 4.4.5 (p.4-85) identifies the following impacts on Highway 101 (the regional system):

- South of Gloria Rd. LOS C to E
- Gloria Rd-Fifth St. LOS C- to D
- Fifth St. – Alta St. LOS C to F
- North of Alta St. LOS C to F

However, none of the following road improvements (mitigation measures) would reduce impacts to Highway 101: Construct three Gonzales interchanges, widen Fifth Street from Rincon to Highway 101, widen Fifth Street from Highway 101 to Fanoe Road/Herold Parkway, widen Fifth Street from Fanoe Road/Herold Parkway to Iverson, synchronization of Signals along Fifth Street, widen Associated Lane, Extend Associated Lane to Iverson, widen Gloria Road and Design for Truck Use, design Iverson Lane for truck use, widen Fanoe Road, Traffic Calming on Arterial A, and update Traffic Impact Fees.

Conclusions that impacts on regional roads would be reduced to less than significant rests solely on use of TAMC's Regional Traffic Impact fees. Those fees are insufficient to fund most highway projects. Major road improvements are dependent on other funding sources such as a local sales tax which has been defeated three times in recent years and State and federal funds. The DEIR also fails to identify if Gonzales has adopted the Regional Impact Fee. Finally, there are no projects currently identified in the TAMC's Strategic Expenditure Plan 2010 Update (p. 3) that address widening Highway 101 to 6 lanes. The proposed frontage road project intended to relieve traffic on Highway 101 south of Chualar is not even identified in the first three phases of the Expenditure Plan.

Cumulative traffic impacts on regional roads should be found to be **significant and unavoidable.** Additionally, failure of the Circulation Element to show how it accommodates proposed land uses makes the element inconsistent with State General Plan Guidelines.

Traffic Safety: Based on Caltran's safety data, Highway 101 from Salinas to Soledad ranks number three in the list of most unsafe roads in Monterey County exceeded only by Highway 101 from Salinas to San Juan Road and Highway 1 from Monterey to Marina. The DEIR fails to address this traffic safety issue.

5. Air Quality

The DEIR states that MBUAPCD does not have significance thresholds for construction-related ozone precursors because they are accommodated in the emission inventories of state- and federal air quality plans (p. 4-122). Only emissions from typical construction equipment are accommodated in these plans. The District is to be consulted regarding emissions from non-typical construction equipment. (CEQA Air Quality Guidelines, Section 5-2).

Consistency with Air Quality Management Plans (AQMPs) is used to address cumulative impacts on ozone levels in place of photochemical modeling. The DEIR finds the project consistent with the 2008 AQMP (pp. 4-124 and 5-3). Based on the analysis under Population and Housing above (item 1), the project is not consistent with the AQMP and should be found to have a **significant and unavoidable** impact on regional air quality.

The transportation section identifies (pp. 4-97, 4-103 and 4-365) the circulation system in Gonzales as consisting of a freeway, three freeway interchanges, and existing and new arterial, collector, and local streets. Policy CIR-1.1 - Interconnected and Efficient Streets, is accompanied with Implementing Action CIR-1.1.12 – Traffic Control: "Provide operational controls, including: roundabouts, traffic signals or stop signs where warranted to facilitate the safe flow of vehicles through intersections. As a first option, consider the use of roundabouts for traffic control at all non-local intersections." Since roundabout can reduce vehicle emissions by up to 28% compared to signalized intersections, requiring the construction of roundabouts as the first options for all future development rather than just considering their use should be identified as a feasible mitigation measure. The following web links related to roundabouts are provided for reference:

http://www.californiawalks.org/safeStreets/roundabouts.htm
http://www.alaskaroundabouts.com/California.htm

http://www.roundaboutsusa.com/
http://www.roundaboutsusa.com/design.html#basics
http://www.roundaboutsusa.com/history.html

The DEIR recommends that the General Plan be amended to include a provision to minimize local air quality impacts related to exposure to Toxic Air Contaminants (TACs). The provision requires that new development be evaluated for proximity to sources of TACs. Based on this measure, the DEIR concludes that exposure of residents to TACs would be reduced to less than significant. Because the measure only requires evaluation and no action consistent with a finding, the conclusion is unsupported and the project's impact related to TACs should be found to be **significant and unavoidable.**

6. Greenhouse Gas Emissions

EIR Page 4-143
The DEIR states (p. 4-143), "The *Gonzales 2010 General Plan's* "Sustainability Element" contains the following policies and implementing measures designed to reduce greenhouse gas emissions from future development." This is followed by a list of policies and Actions. For example…

Policy SUS-1.1 Climate Protection Strategies

Implementing Action SUS-1.6.2 – Standards for Green Building. Consider developing and adopting interim and long-term standards for green building in addition to those identified in the California Green Building Code.

Implementing Action SUS-1.1.4 – Monitor Performance. Regularly assess progress and program needs, identifying opportunities and obstacles for meeting GHG emission reduction goals.

Policy SUS-1.6 Encourage Green Building Practices Employ sustainable or "green" building techniques for the construction and operation of buildings where feasible.

Implementing Action SUS-1.6.1 – Energy Efficient Buildings. Encourage the design and construction of energy efficient buildings where feasible using ''green'' technology and principles such as:

Implementing Action SUS 1.6.3 – Municipal Buildings as Green Building Models. Utilize green building practices in the design of new and major remodels to City buildings. Greening of public buildings should provide a model for private construction/retrofit.

Implementing Action SUS 1.6.4 – Recycled Building Materials. Promote the reuse of building material, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent feasible.

Implementing Action SUS-1.6.5 – Construction/Demolition Recycling. Develop standard conditions of approval for all new developments to prepare and

> implement a construction/demolition waste recycling plan as a condition of project approval and entitlement. Enforce through the building inspection process.
>
> Implementing Action SUS-1.6.6 – Deconstruction. Deconstruction is the process of dismantling a building in order to salvage select materials for reuse. Encourage the scheduling of time for deconstruction activities to take place during project demolition as appropriate.
>
> Implementing Action SUS 1.6.9 – Sustainable Landscape. Implement sustainable landscape design and maintenance, where feasible.

Except for the above Implementing Actions SUS 1.6.3 and SUS-1.6.5, all the above Actions use language such as "consider developing", "regularly assess", "encourage", "promote", "to the extent feasible", "where feasible", "as appropriate", and "promote use". This kind of language translates to no mandate whatsoever to implement any action at any time and so is inappropriate for use in an EIR as a mitigation, especially as a program EIR is intended to be used in the future as a "first tier" environmental document. Furthermore, if the EIR claims that the above examples of Actions are "…designed to reduce greenhouse gas emissions from future development." these Actions, so as to be "effective", must include language that is decisive. For example, Action SUS 1.6.6 should read as follows:

> Deconstruction is the process of dismantling a building in order to salvage select materials for reuse. All projects shall schedule time for deconstruction activities to take place during project demolition.

Throughout the Greenhouse Gas Emissions section are similarly crafted Actions whereby there is no requirement for action by the City, developer or applicant, and therefore such Actions ultimately serve no purpose in an EIR.

7. <u>Hydrology and Water Quality.</u>

The 2007 Monterey County General Plan DEIR (2008) is referenced as a source of information. (pp. 4-193-145). The DEIR should be updated to reference the 2010 Monterey County General Plan FEIR.

The water demand assessment assumes water demand by agriculture and urban uses are equivalent. Does the analysis account for groundwater percolation from agricultural use of between 20 and 33 percent? Since urban uses would include hundreds of acres of in permeable surfaces, water returned to the Salinas Valley Groundwater basin would be dramatically reduced. Please address this issue as it relates to water demand estimates.

Buildout of the Urban Growth Area would require an additional 0.32 MGD (358AFY) beyond the 5.78 MGD currently used for agriculture that will be replaced with urbanization (p. 4-211). Buildout of Urban Reserve would require an addition 1.05 MGD (1,176 AFY). The DEIR references Policy FS 2.1 that would maintain average groundwater extractions to about 5.8 MGD within the Urban Growth Area and concludes that buildout of the Urban Growth Area will have neither a significant project level nor cumulative impact on groundwater supplies. There is no quantitative analysis supporting

the finding that the increased demand within the Urban Growth Area of 358 AFY can be offset. Further, the DEIR fails to address the impact of buildout of the Urban Reserve Area on groundwater supplies.

The DEIR states (p. 4-199):

> The Salinas Valley Groundwater Basin is not currently adjudicated, which means that disputes over the use of groundwater supplies, to the degree that they exist at all, have not grown serious enough to compel landowners and water purveyors in the area to request court action to settle disputes. Adjudication would be a sure sign that groundwater supplies were failing to meet increasing demands.

The DEIR should be revised indicating that adjudication has been suspended by the State Water Resources Control Board pending the successful outcome of the Salinas Valley Water Project. The SVWP EIR/EIS (Section 2.1, page 2-1, Overview: Need for Action) states:

> Nearly all of the Basin's water needs are provided by the groundwater resources in the Basin. As a result of an ongoing imbalance between the rate of groundwater withdrawal and recharge, overdraft conditions have allowed seawater from Monterey Bay to intrude inland to the northern portion of the Basin. Both of the heavily used 180-Foot and 330-Foot aquifers have been affected. This problem was first documented in the mid-1940s. By 1999, an estimated 24,108 acres of land were underlain by seawater intrusion in the 180-Foot aquifer, and 10504 acres were underlain by seawater intrusion in the 400-Foot aquifer (MCWRA 2001). It is estimated that seawater has intruded an average of 10,000 AFY since 1949. Aquifers intruded with seawater are largely unusable for either agricultural or municipal purposes.
>
> The State Water Resources Control Board (SWRCB) initiated proceedings to adjudicate the Basin in 1996. The Board's goal is to work with the MCWRA and other local stakeholders to reach consensus on a process to protect the groundwater resources in the Basin. If consensus cannot be reached, the SWRCB will adjudicate the Basin and take control of the water resources. The SVWP represents the local consensus approach to protecting the Basin's groundwater resources.

The description of the existing condition of groundwater supplies in the Salinas Valley Groundwater Basin is totally inadequate. The DEIR fails to present any analysis of the total water demand and supply in the Salinas Valley ground water basin. Under the cumulative analysis, the DEIR makes no effort to project demand from the jurisdictions that use the same ground water basin or to compare the total demand to available supplies. The water supply assessment must include specified information about groundwater if, as is the case with the Project, existing groundwater supplies are to be used, including:

- a review of relevant information in the urban water management plan;
- a description of the groundwater basin;
- information regarding overdrafting and efforts to eliminate it;

- a detailed description and analysis of the amount and location of groundwater pumped for the past five years from the basin;
- a detailed description and analysis of the amount and location of groundwater that is projected to be pumped; and
- an analysis of the sufficiency of the groundwater from the basis to meet the projected water demand associated with the proposed project. (Water Code, Section 10910, subd. (f).)

The DEIR and the FEIR for 2010 Monterey County General Plan Update rely on the Salinas Valley Water Project (SVWP) to meet future growth within the Basin. However, the EIR prepared for the SVWP does not anticipate either the growth in agricultural acreage in the county or the growth in population that the Gonzales General Plan projects combined with growth in other Salinas Valley jurisdictions.

The SVWP assumed that a 13.6% increase in water use efficiency from better irrigation methods and different cropping patterns, coupled with a 1,849 acre *decline* in agricultural acreage would require 358,000 afy. SVWP EIR, Table 1-2 (demand), § 7.2.3 (acreage assumptions). The 2007 County General Plan EIR projects a net *increase* in agricultural acreage of at least 7,682 acres and no increase in efficiency. (GPU2010 FEIR, pp. 2-65 to 2-66). Similarly, the SVWP EIR assumed a 2030 population of 355,829 persons while the new forecast for the Salinas Valley shows 517,788 persons (GPU2010, FEIR, p. 4-85, Table 4.3-9c).

The FEIR for GPU 2010 presents a water balance for the Salinas Valley that shows a 542 AFY surplus of water supply over total demand through 2030. FEIR, p. 4-83, Table4.3-9b (demand projected at 442,458 afy, supply projected at 443,000). This table is the basis of the EIR's conclusion that water supply and salt water intrusion impacts in the Salinas Valley will be less than significant and that no mitigation is required through 2030. Because this table is based on fundamentally inconsistent land use assumptions from the SVWP EIR, it cannot support the EIR's findings. These same findings are applicable to the Gonzales General Plan as well.

Even though the Gonzales General Plan includes policies intended to limit water demand to existing levels of the agricultural land being converted, the DEIR fails to address cumulative impacts associated with existing water demand within the Salinas Valley. Perpetuating existing demand does not address cumulative impacts, and without a new water supply beyond the SVWP, water quality will continue to worsen based on projected growth and development within the Salinas Valley. The project's cumulative impact on water supply and saltwater intrusion should be found to be **significant and unavoidable.**

Thank you for the opportunity to review the DEIR.

Sincerely,

Amy L. White
Executive Director

cc: Monterey County Local Agency Formation Commission

Attachment 1

GENERAL PLAN POPULATION FORECASTS FOR MONTEREY COUNTY

Jurisdiction	Buildout Population	General Plan Forecast Population	AMBAG 2030 (1)	AMBAG 2035 (1)	Calif. Depart. of Finance (DOF) Pop. Estimates for 1/1/10
Soledad(2)	58,000	(3)41,405	38,801	41,405	27,929
Gonzales(4)	Growth Area 37,825 Urban Reserve 61,825	(3)32,418	20,941	23,418	9,114
Greenfield(5)	36,000	(post 2020) 36,000	27,348	30,337	17,898
Salinas(6)	213,063	(2020) 213,064	170,913	173,359	153,948
King City(7)	24,726	(3)24,726	22,482	24,726	12,140
Carmel(7)	4,033	(3)4,033	4,007	4,033	4,053
Del Rey Oaks(7)	3,171	(3)3,171	3,197	3,171	1,649
Marina(8)	40,000	(2020) 40,000	32,010	32,942	19,445
Monterey(9)	35,142	(2025) 34,951	30,650	30,836	29,445
Pacific Grove(10)	17,683	(3)15,036	15,057	15,036	15,683
Sand City(7)	1,498	(3)1,498	1,498	1,498	326
Seaside(11)	43,000	(3)53,549	35,017	53,549	34,628
Unincorporated(12)	Inland 209,459 Coastal – 7,197	(2030) 137,449 6,950	113,628 6,950	114,052	109,607
Total	792,622	(by 2035) 635,250	515,549	530,362	435,878

(1) AMBAG 2008 Population Forecasts
(2) City of Soledad 2005 General Plan - excludes Miravale III (15,200 persons)
(3) AMBAG 2035 Forecast in lieu of General Plan forecasts
(4) City of Gonzales Draft General Plan (p. 4-21)
(5) City of Greenfield 2005 General Plan (p. 2-39)
(6) City of Salinas 2002 General Plan (p. LU-39)
(7) AMBAG forecasts used in lieu of General Plan Buildout numbers
(8) City of Marina 2009 General Plan; 40,000 persons by 2020 (p. 26)
(9) City of Monterey 2005 General Plan; 2,125 new units (p. 21); 2,125 x 2.2 persons/dwelling unit + 30,467 persons (AMBAG 2005). Persons/dwelling unit from AMBAG Monterey Bay Regional Forecast, p. 27.
(10) City of Pacific Grove, March 23, 2010 letter to Public Utilities Commission showing 1,075 new units. 1075 x 1.8 pers/dwelling unit + 15,683 persons (DOF 1/1/10 estimate). Persons/dwelling unit from AMBAG Monterey Bay Regional Forecast, p. 29
(11) City of Seaside 2004 General Plan (p. LU-14)
(12) Draft Monterey County 2010 General Plan, Table 3-8; Coastal Zone legal lots of record only of 2,589 (2006 Monterey County General Plan Final Environmental Impact Report, p. 20); 2,589 x 2.78 persons per dwelling unit