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June 29, 2011

Paul Getzelman, Chair
Monterey County Planning Commission
168 West Alisal Street
Salinas, CA 93901

RE: Villas de Carmelo

Dear Chair and Commissioners:

LandWatch Monterey County has commented on the draft EIR, re-circulated draft EIR, and the final EIR. We oppose the project as currently configured because of impacts on water, traffic, and surrounding land uses. Furthermore, LandWatch is concerned that the County has failed to follow the Coastal Commission's advice and instead is moving forward with the application prior to seeking an amendment to the Local Coastal Plan (LCP). The proposed project conflicts with many LCP policies and also raises significant concerns with policies in Chapter 3 of the Coastal Act. LandWatch believes the County should first submit required LCP amendments and consider the application after the Coastal Commission has acted. The outcome of the LCP amendment process will identify a project that is consistent with Coastal Act requirements.

The proposed project would create significant impacts to water and traffic, and is far too large for the site (see attached Google Earth overlays). However, LandWatch supports Alternative 8: the Hybrid Existing and High Density Zoning Alternative. This alternative would meet most of the project's objectives while greatly reducing environmental impacts. Alternative 8 would: rehabilitate the historic resource under a new High Density residential zoning; provide 7 single family residents on the remainder of the project site under the existing MDR/2 zoning; avoid the significant and unavoidable impact to scenic resources; lessen the overall impacts of the development by reducing the area of development and the number of residential units; establish a high quality residential community to house future county residents; provide market rate, affordable, and workforce housing stock to the Monterey Peninsula; and reuse vacant buildings on a site with infill development.

A zoning change, such as the one needed for the proposed project, should be a benefit to the entire community. Payment of the in-lieu proposed by the applicant does not address the shortage of affordable housing on the Peninsula while rehabilitating existing structures to include some affordable units would meet an unmet community need. We urge the Commission to ensure the needs of the community are met when considering this zoning change.

Thank you for the opportunity to address the Commission on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. White". The signature is written in a cursive, flowing style.

Amy L. White
Executive Director