

March 1, 2021

Monterey County Board of Supervisors County of Monterey 168 West Alisal Street, 1st Floor Salinas, CA 93901 COB@co.monterey.ca.us

Re: Charolais Ranch Subdivision Project (PLN050692) March 2, 2021 Agenda Item 30

Dear Members of the Board of Supervisors:

LandWatch Monterey County cautions the Board of Supervisors to proceed carefully in considering the proposed 26-unit Charolais Ranch Subdivision Project. From all indications, this is the wrong project in the wrong place. LandWatch joins and seconds the comments made by the Stamp Erickson firm on behalf of Friends, Artists and Neighbors of Elkhorn Slough (FANS).

Approval of this project remains discretionary. It is difficult to imagine that the County would seriously consider this project, which is antithetical to County growth policies. It is sprawl development. It lacks affordable housing. It is in a High Wildland Fire Hazard Area. It lacks a sustainable water supply. Its septic systems would aggravate water quality problems. It would destroy habitat, including oak woodlands. It would aggravate traffic safety problems.

The County's 2010 General Plan Policy NC-1.5 bars approval of North County pending "a comprehensive review of infrastructure constraints regarding circulation, wastewater, and water supply." This policy is identified as essential mitigation for new development in the 2010 General Plan EIR. However, the County has not conducted this comprehensive review, much less adopted programs to address the circulation, wastewater, and water supply constraints. For example, the EIR preparer acknowledges the lack of a long-term sustainable water supply.

There is no question that this project would aggravate the cumulative circulation, wastewater, and water supply problems in North County. These problems must be assessed and mitigated in an EIR that provides the comprehensive review that the County acknowledged to be necessary and committed to provide before approving new subdivisions.

The need for this comprehensive review cannot be denied by claiming that this project is not subject to the 2010 General Plan. The fact that the developer sat on his application for 13 years and may claim that the project should be reviewed for consistency only with the 39-year old 1982 General Plan policies does not change the

environmental facts on the ground. Having acknowledged the significant unmitigated environmental impacts from new North County subdivisions in its 2010 General Plan EIR, the County cannot now un-ring that "environmental alarm bell." (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.)

Thank you for the opportunity to comment.

Sincerely,

Michael D. DeLapa Executive Director