

Exhibit D

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October 14, 2021

Shawn Archibold
Assistant Planner
HCD - Planning Department
1441 Schilling Place, 2nd Floor
Salinas, CA 93901

**SUBJECT: VARIANCE REQUEST LETTER - SUSAN STREET AGRICULTURAL
HOUSING PROJECT – PLN210152**

Dear Mr. Archibold,

We have prepared this letter to request a variance to allow the Susan Street Agricultural Employee Housing (proposed project) (PLN210152). The proposed project consists of an application for a use permit, General Development Plan, and design approval to allow construction of 60 apartment units with a maximum of 480 beds to be used as agricultural worker quarters during the Salinas Valley harvest season, which lasts from April to November of each year. The proposed project would include four (10) two-story apartment style buildings, as well as various amenities, including two (2) laundry facilities, one (1) manager unit, one (1) recreation room, open space, and an informal recreation field. The proposed project is located on the north end of Susan Street in unincorporated Monterey County, California. The proposed project is located on a 3.41-acre parcel (Assessor Parcel Number [APN] #117-361-016-000) in the unincorporated Pajaro Community adjacent to the Pajaro River. The project site is located within the High Density Residential (HDR), Farmlands (F), and Resource Conservation (RC) zoning districts.

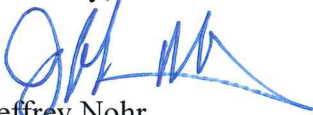
Based on conversations between our office and County Staff, we have been advised that the proposed project is eligible for a use permit and variance, and that no rezoning is required. The proposed project is considered to be a supportive agricultural use as it would provide seasonal living accommodations for agricultural employees. According to Section 21.30.050(AA) of the County Code of Ordinances, agricultural employee housing consisting of 37 or more beds in a group quarters is an allowable use under the Farmlands (F) Zoning District, provided a use permit is granted. The use permit for the proposed project will cover more than 36 beds and the requested variance will allow the proposed project's lot coverage to be greater than 5%. In addition, the conversion of agricultural land in the Pajaro community area was analyzed in the Monterey County General Plan EIR (September 2008). The EIR determined that a total of 2,571 acres of important farmland was anticipated to be permanently and irreversibly converted to

urban uses. This was determined to be a significant and unavoidable impact, which eliminates the need to rezone the site.

The proposed variance request would be consistent with Section 21.72.040 of the Monterey County Zoning Ordinance in which a variance may be granted subject to specific findings. Special circumstances applicable to this property include proposed use, unusual size and shape, and its location within the High Density Residential zoning (HDR/20), as well as the site's close proximity to other surrounding parcels with HDR/20 designations. The property is unique in that it contains multiple zoning designations with conflicting requirements and design regulations. Due to these circumstances, the strict application of the 5% lot coverage requirement would not be viable for the project and strictly applying the lot coverage requirements would deprive the property of privileges enjoyed by other properties in the County under similar circumstances and zone classifications. Based on the reasoning described above, the proposed project would be eligible for a variance to allow the construction of seasonal farmworker housing, an allowable use under the Farmlands (F) Zoning District.

The proposed project represents a unique opportunity to provide high-quality housing units for Monterey County's farm labor workforce. Please contact me if you have any questions about this request.

Sincerely,



Jeffrey Nohr

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CC:

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