

Attachment 2

From: [Allen, Eric](#)
To: [293-phearingcomments](#); [100-District 1 \(831\) 647-7991](#); [100-District 2 \(831\) 755-5022](#); [100-District 3 \(831\) 385-8333](#); [100-District 4 \(831\) 883-7570](#); [100-District 5 \(831\) 647-7755](#)
Subject: letter to supervisors regarding RHNA proposal
Date: Friday, May 31, 2024 7:57:39 AM
Attachments: [Letter to the Supervisors for June 4 2024 meeting .pdf](#)

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I have lived in Monterey since 1996. I have worked for the VA as a primary care doctor since 1996.

Around the VA building on 201 9th street there is an remarkable building of apartments/homes. It is a visual example of what is being done to build homes in a concentrated form. I am worried about this type of building and can already envision the impact this will have on the traffic and congestion in this area.

I am also concerned of the concentrated housing being proposed in the city of Monterey. Please review the letter attached as it is a well thought out reason you need to reconsider you current plans.

Please let me know your thoughts on this matter.

Eric Allen, MD

The Staff's Affordable Housing (RHNA) Proposal must be rejected.

On May 6, 2024, the County published their 985-page Regional Housing Needs Assessment (RHNA) in response to the State's mandate. The work for this proposal started nearly two years ago, was known to be coming for several years, and the County spent nearly \$2M on consultants to prepare this proposal. With all that, they are still 6 months late.

On May 15, 2024, the County's Planning Commission reviewed a presentation by the staff on their work. The proposal was resoundingly rejected by the commission and virtually everyone in attendance (except by one developer).

The Potential Long-Term Effects of the Proposal

The staff analyzed that the County needed 3326 new housing units in the next 8 years. Commissioner Daniels rightly asked, "how many units are currently in the pipeline?" which would reduce this number. After subtracting the "pipeline" units, the ACTUAL need in the County is 1269 units. Adding the state-required 15% buffer should raise the proposal to 1460 units. But the staff is proposing that we build over 10,000 housing units!

While we can always build more units than proposed, it is imperative to propose the minimum number that the State mandates. The reason for this is very simple: once the plan is accepted, the State will require the County to rezone all the sites identified in the proposal into high density residential zones with up to 20 housing units per acre. Even more concerning is that this rezoning may be permanent! In fact, Director Spenser stated that "*it is difficult to reverse zoning decisions.*" While we may think that the Planning Commission can control the number of units built through the permitting process, the State is already planning to move local control of RHNA identified sites to the State's HCD. Telling the State that we need 10,000 homes will virtually guarantee that permits for more housing than we need will eventually be approved.

The only possible reason for advocating for 10,000 units is to subsidize the cost of building low-income housing units. Building 10,000 units is essentially building ten East Garrison communities. Can the Monterey Peninsula support

that many new homes? Do we have the infrastructure for it? Can the environment survive it? The answer to all these questions is “no”.

Funding for Affordable Housing

Commissioners Daniels and Diehl point out that, for the past several decades, the County has been using the Inclusionary Housing Ordinance (IHO) as a method to fund the building of Affordable Housing. The IHO requires developers to build one “affordable” house for every four “market” houses that they build. Both commissioners pointed out that this program has been an abject failure. It has failed to build the affordable housing that we need. There must be a better way to achieve the construction of 1200 affordable housing units without destroying the community that we love. At the May 15 meeting, Commissioner Diehl said: we *“cannot support going forward with the IHO as it exists now as a basis for identifying the number of sites as we see here.”*

In March, I asked Director of Housing, Mr. Craig Spenser, “how much financial support would a developer need to build affordable housing and still make a profit?” His answer was “around \$250,000 for each unit” If one assumes that this is roughly correct, it is simple arithmetic to estimate that we need roughly \$35M per year in financial assistance to achieve our housing needs. Our County has a population of roughly 500,000 people. Distributed over the population, this is \$75 per person per year or \$6 per person per month. Obviously, there are other funding methods and algorithms that may be more equitable. In a County as large as ours, this can be done.

Objections for the lack of transparency

Our communities were not informed that there was any discussion regarding the County’s site selection process, the County’s proposal and how it would affect our communities. In fact, when we accidentally learned of the activity and then reached out to the staff (in early December 2023), we were told “it is too late to provide input or for the County to change its proposal.” The staff

told us that notices were posted on the County's website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn't enough time to hear our concerns.

I reached out to my Supervisor in February for a meeting which she arranged with the Staff four weeks later (in March). We provided the Staff with a list of questions, and it took the Staff 6 weeks after the meeting for them to reply.

The County Staff informed me that there were nine "pop-up" events but none in our community and the times and locations of these "pop-up" events were not advertised to us.

According to the proposal, the County Staff had multiple meetings with "stake holders" which are curiously absent of property tax-paying homeowners and residents of the affected areas, but developers were included. Per the proposal, the stake holders included:

- i. Carmel Valley Association
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- iv. Housing Advocacy and Community Organizations
- v. Affordable Housing Managers
- vi. Ag-based business advocacy groups
- vii. Hospitality community
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- ix. Affordable housing developers

There are multiple sites (61-69 along HW 68 near Olmsted Road) in the proposal that identify a parcel of land with an existing residence. In the proposal, the staff assumes that the existing houses on several of these sites will be "removed". I understand that there are other sites in Carmel Valley that have similar designations. To my knowledge, none of these site owners have been informed of the Staff's recommendations. Several people showed up at the Planning Commission meeting on May 15 and informed the Planning

Commission that they had just learned of these proposals and their impact to their properties within the previous 72 hours.

The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population. How can one base policy and procedures with such a low turnout?

This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community and in particular, the tax-paying property owners of the county.

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1269 units (see table below which is derived from the proposal) and only 1096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower income categories is 1460. But the County is proposing to develop over 10,000 housing units.

Housing type	Identified Need	Units In Process	Actual Need
Extremely low	1070	184	886
Low	700	490	210
Moderate	420	247	173
Above Market	1136	1345	-209

The Inclusionary Housing Ordinance (IHO) is used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units would be built. This formula forces the County to approve the development of housing units **that are not needed and only amplify sprawl and negatively impact the environment.** As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades.

The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. I estimate that the County needs approximately \$35M per year to support the development of these units (1100 units x \$250K/unit divided by 8 years; note that moderate units do not need additional funding). This is not an insurmountable amount. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and an monstrous environmental impact.

Errors in the recommended sites

The published guidelines for the RHNA proposal include instructions to:

- 1) Protect desirable land uses
- 2) Prevent soil erosion and enhance water quality
- 3) Minimize risks from fire

This proposal fails on all three counts.

Furthermore, the proposal fails miserably on infrastructure requirements.

The Housing Element Sites Inventory Guidebook specifically states that the County is to:

Provide in the analysis a general description of any known environment or other features (floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites.....The analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities.

and

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program plan

The Staff's proposal fails on both requirements. Sites with floodplains, protected wetlands, oak tree preserves, and very high fire hazard are included in the proposal. Furthermore, sites without water resources, sewers etc., are also included. These sites need to be removed from the proposal.

Objections to sites 1-4 and 61-68 in the "South of Airport" vicinity

Taken together these sites have a capacity of 1835 units in the RHNA proposal. This is approximately 20% of the entire County's proposal. If this were to be completed, a fair estimate for the population of the proposed South of Airport housing would be approximately 3700 people, all located within 110 acres (according to the proposal), which is 0.17 square miles. This is a population density of over 19,000 people/sq mile. In comparison, the population density of the City of Monterey is only 3,285 people/sq mile. In fact, the proposed South of Airport housing would have a higher population density than the city of San Francisco (18,633 people/sq mile).

The negative impact on the environment cannot be overstated.

There are numerous problems with the proposal for these sites. Specifically, regarding Sites 61-68:

- a. These sites will account for 417 housing units.
- b. The proposal is to remove existing houses to build affordable housing. The text regarding several of these seven sites says: "***The existing development (house) at this site is assumed to be removed for higher density housing development to occur.***"

Has the staff informed the homeowners and residents that the County is considering removing them from their properties?

- c. The entrances and exits from these properties are single lane roads (not larger than a driveway and can only accommodate a single car in one direction) directly onto HW68. **In case of an emergency, how are approximately 750 cars going to exit using a single lane driveway onto Highway 68?**

Regarding all 12 sites in the “South of Airport” area (sites 1-4 and 61-68):

All sites fail on AB 1397 “realistic sites”. The State requires that all sites proposed be “realistic sites” and these sites all fail for the following reasons:

- **Environmentally sensitive area:** The Big Sur Land Trust (BSLT) has recently purchased a 50-acre parcel of land that is contiguous to these parcels and, together, form a wildlife corridor and essential fire break. The features of the purchased land will also be true for these parcels. These features include:
 - a. Preserving the cultural importance of the land to the Ohlone/Costanoan-Esselen Nation.
 - b. The wetlands conserved on this property trap sediment, improve water quality and decrease the flood risk for the downstream communities along the Canyon Del Rey watershed. These ecosystem benefits will help reduce climate change impacts related to increased storm flows of water and sediment.
 - c. The wetlands also help to sequester carbon, and the property’s location in a wildlife corridor will allow species to move across landscapes to find food, water and shelter.
 - d. Proper management of this land will reduce wildfire risk for the surrounding wildland urban interface of Monterey and Del Rey Oaks.
 - e. By preventing potential development, the BSLT is protecting important habitats that are part of a valuable wildlife corridor. Deer, coyote, mountain lions and black bears have been spotted on the land.

- f. This preservation supports the State's 30×30 goals of protecting 30% of California lands and waters by 2030,
- **Water:** Recently, a developer investigated the availability of water on parcels 2-4 by drilling, for the purpose of building a development using the Affordable Housing Overlay. The study concluded that there was insufficient water to proceed without additional water permits (page 3-42 in the proposal). However, no additional water permits are available in the county. **How does the County propose to build approximately 10,000 housing units without water, and specifically, over 1800 units on the South of Airport sites?** As stated in the proposal, water treatment is expensive. ***A more realistic approach would be to focus on locations where water is already available.*** This can be achieved by focusing on redevelopment of existing buildings and converting them into affordable housing units (as has been done in Salinas at the Rabobank project).
 - **Traffic:** Traffic on HW 68 is already congested. Bringing affordable housing closer to jobs is certainly the correct approach but doing so by gridlocking HW 68 is not reasonable. The additional units proposed for the "South of Airport" area (1835 total units) would add over 3500 cars to the intersection of HW 68 with Olmsted Road and Josselyn Canyon Road. Gridlocking HW 68 at Olmsted Road would severely impact ingress and egress to and from Monterey Regional Airport, an economic lifeline to the County. Furthermore, in case of an emergency, it would be unfeasible to exit these properties.
 - **Air quality:** The congested traffic will cause significant deterioration in local air quality, both to onsite residents of the new development and to nearby existing populations. The specific pollutants of public health concern are sulfur dioxide, oxides of nitrogen, carbon monoxide and carbon fiber from tires. Approximately 20,000 deaths per annum occur in the United States from these air pollutants. The additional pollutants will certainly decrease the health of this community.

- **Fire hazard:** This area is in a “high fire danger zone” and is adjacent to an “extremely high fire danger zone.” At present, it is virtually impossible to obtain fire insurance for most houses in the area. Homeowners and residents in this area will have to bear the burden of self-insuring but affordable housing is for low-income households who cannot afford to self-insure. Additionally, one of the important functions of the existing greenbelt zoning gives the entire community an important firebreak. CALFIRE depends on this parcel for fire protection of this whole region. These parcels are effectively the last line of defense to repel a wildfire from entering the City of Monterey. These parcels were used extensively by CALFIRE for staging during the last major wildfire.
- **Airport noise:** The takeoff noise of individual flights over the subject parcel needing rezoning could reach 85 decibels or higher. Not only is this level high enough to cause progressive hearing loss to the 3000+ residents of the subject parcels, but that sound level would make a simple child pedestrian crossing of Olmstead a life-threatening event for both children and seniors, who may cross Olmstead frequently but cannot hear oncoming cars due to the noise from plane engines.
- **Vanishing Greenbelt.** The removal of this greenbelt is a significant adverse impact aesthetically and visually as well as a loss of habitat for many keystone animal species that can be observed on the subject parcel. Frequent observations occur of Apex/keystone species such as Mountain Lion, Bobcat and Coyote as well as many avian species of special interest, such as red shouldered hawks and peregrine falcons.
- **Safety (flight crash risk):** Within the past 3 years, a plane from Monterey Airport crashed into a single-family residence located approximately 1 mile south of airport. Fortunately, no one was home at the time and the casualties were limited to the pilot and her passenger. This will not be the case with such a high-density development which is far closer to the airport. In the event of a similar accident hitting the proposed development, the casualties would number in the hundreds if not thousands.

- Carcinogenic Aquifer Plume emanating from Fort Ord.** It is well established that there are several carcinogenic and toxic chemicals in the groundwater emanating from Fort Ord. It is also known that this subsurface water plume is presently moving in the direction of the proposed rezoning parcel, if not already present beneath the subject parcel. This is a serious threat to residents of the subject parcels, particularly to children who will predictably explore the soil of their neighborhood.

Errors in proposal for all the South of Airport sites:

The parcels are all graded on an Amenity Point System which is based upon distances to needed amenities, such as grocery stores, jobs and doctors’ offices. The stated distances in the proposal from these sites to these amenities are incorrect and hence, also the subsequent Amenity Grade. For these 12 sites, the description identifies a doctor’s office that does not exist and distances to amenities that are incorrect. The table below illustrates the errors, where the Distance in the Proposal is compared to the Actual Distance:

Entity	Distance in Proposal (miles)	Actual Distance (miles)
Safeway	1	3
Doctors on Duty (Monterey)	1	5
Doctors on Duty (Del Rey)	1	DOES NOT EXIST
Seaside Family Health Clinic	0.5	3
Foothill School	0.5	Not Available

The Foothill Elementary School is not an open school. The City of Monterey closed the site several years ago. It is currently leased to a chartered school and is therefore unavailable for public use. **The County cannot use this in the amenity point system.**

Errors such as the above make the reader question the validity of the entire document. What other errors or omissions are in this document which was ‘hurried through’ and is now being ‘rushed through for approval’ because it is six-months late by the Staff and the consultants?

Summary

The Staff and the Supervisors have not provided its constituents with a transparent process, nor have they actively included the county’s major stakeholders, that is, the tax-paying residents. When reached by members of the public, the staff reported that the proposal could not be amended. When asked for meetings, the staff were typically too busy and responded to our questions in months rather than days.

The Staff spent nearly \$2M on consultants from Irvine, CA, and this proposal appears to be nothing more than an internet search using “Google Maps” and “Siri”. The sloppiness of this report cannot be overstated. The viability of the sites was not confirmed. In many cases, the slopes of these sites are over 25 degrees, which makes them virtually impossible to build upon. Sites inside “extremely high fire danger zones” should have been removed. Sites with archeological significance, or wetlands, should have been removed. The number of errors in this report is appalling. This makes one question how the County is spending the tax-payer money.

The County **MUST** find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle and upper income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1100 affordable housing units is not unreachable. This can be supported by beginning to think “outside the box”

with funding and focusing on redeployment of existing sites with existing water permits.

Finally, the Supervisors CANNOT accept an analysis and proposal that is riddled with errors. Commissioner Diehl said it succinctly when she summarized that “***if you want something badly, that’s what you’re going to get. This is too important to get it wrong.***”

From: [Sam](#)
To: [293-pchearingcomments](#)
Subject: RHNA Proposal
Date: Friday, May 31, 2024 10:35:18 AM

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The staff's RHNA proposal must be amended.

Sam Brand
Monterey Taxpayer

From: [Henry Brown](#)
To: [293-phearingcomments](#); [100-District 1 \(831\) 647-7991](#); [100-District 2 \(831\) 755-5022](#); [100-District 3 \(831\) 385-8333](#); [100-District 4 \(831\) 883-7570](#); [100-District 5 \(831\) 647-7755](#)
Cc: ["Karen Brown"](#)
Subject: Comments for the Jan 4 Supervisor Meeting regarding the RHNA proposal
Date: Thursday, May 30, 2024 9:58:33 AM
Attachments: [Letter to the Supervisors for June 4 2024 meeting .docx](#)

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Dear Monterey County Supervisors.

I am attaching my letter of objection to the current Affordable Housing (RHNA) Proposal. This is a very bad proposal for our county and will not solve our affordable housing crisis. Accepting this plan will have long lasting and likely permanent negative impacts on our county. You must reject this plan!

Sincerely,

Henry Brown, Monterey County Resident.

Henry Brown
H Brown Lending
Phone: 877 443-6791
Fax: 866 237-4908
BRE#: 01053202
NMLS#'s: 1456856/291177

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Errors such as the above make the reader question the validity of the entire document. What other errors or omissions are in this document which was ‘hurried through’ and is now being ‘rushed through for approval’ because it is six-months late by the Staff and the consultants?

Summary

The Staff and the Supervisors have not provided its constituents with a transparent process, nor have they actively included the county’s major stakeholders, that is, the tax-paying residents. When reached by members of the public, the staff reported that the proposal could not be amended. When asked for meetings, the staff were typically too busy and responded to our questions in months rather than days.

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The County **MUST** find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle and upper income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1100 affordable housing units is not unreachable. This can be supported by beginning to think “outside the box”

with funding and focusing on redeployment of existing sites with existing water permits.

Finally, the Supervisors CANNOT accept an analysis and proposal that is riddled with errors. Commissioner Diehl said it succinctly when she summarized that “***if you want something badly, that’s what you’re going to get. This is too important to get it wrong.***”

From: [Marjorie Clements](#)
To: [293-pchearingcomments](#); [100-District 1 \(831\) 647-7991](#); [100-District 2 \(831\) 755-5022](#); [100-District 3 \(831\) 385-8333](#); [100-District 4 \(831\) 883-7570](#); [100-District 5 \(831\) 647-7755](#)
Subject: Comments for the 6/4 Supervisor Meeting regarding the RHN Proposal
Date: Wednesday, May 29, 2024 1:37:45 PM

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

The Staff's Affordable Housing (RHNA) Proposal must be rejected!

Our communities were not informed that there was any discussion regarding the County's site selection process, the County's proposal and how it would affect our communities. We accidentally learned of the activity and reached out to the staff early 12/23, and were told 'it is too late to provide input or the County to change its proposal.' This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community and the tax-paying property owners.

The density of this project for 3700 people all located within 110 acres, which is 0.17 square miles. The population density of over 19,000 people/square mile. The City of Monterey is only 3,285 people/square mile. The proposal would have a higher population density than the City of San Francisco 18,633 people/square mile.

The entrance and exits from these properties are single lane roads and cannot handle 750 cars going to exit in a single lane to Highway 68 in case of an emergency.

I personally wanted to add a shower to our downstairs bathroom bedroom for my 93 year old mom so she wouldn't have to go and down stairs. It was a process and then had to buy water credits. Where is the water coming for all these units?

The traffic grid on Highway 68 during rush hour times is ridiculous. There needs to have another lane in each direction now. When you add 750 cars to that intersection will be a nightmare! Emergency vehicles would not be able to get through this grid.

This area is a HIGH fire risk! I am not able to find anyone to insure my home because of it. Do you really think the tenants are going to afford the insurance? A couple of years ago, there were two forest fires started by homeless camps on Olmstead. Do you really want to add more units to this HIGH fire risk area?

A couple of years ago, there was a plane from Monterey airport that crashed into a single family residence located approximately one miles from the airport. This could easily happed again but now you have 3700 people in units for density to make matters worse.

This location is not close to grocery stores, doctors or schools. Foothill School which was in your proposal is now a charter school and I don't think low, low income residents can afford to send their kids there.

Lastly, how is the County funding this project? It's never been disclosed.

This Affordable Housing (RHNA) Proposal must be rejected!!!!!!

M. Clements
Sent from my iPad

McDougal, Melissa

From: Arthur Cook <arthur_cook@msn.com>
Sent: Tuesday, May 28, 2024 8:53 PM
To: 293-pchearingcomments; 100-District 1 (831) 647-7991; 100-District 2 (831) 755-5022; 100-District 3 (831) 385-8333; 100-District 4 (831) 883-7570; 100-District 5 (831) 647-7755
Subject: Monterey County Regional Housing Needs Assessment
Attachments: Letter to the Supervisors for June 4 2024 meeting .docx

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Dear Supervisors,

Please reject Staffs RHNA for the overwhelmingly important reasons stated in the attached letter.

Sincerely,
Arthur B. Cook

TO: Monterey County Board of Supervisors

pchearingcomments@co.monterey.ca.us

district1@co.monterey.ca.us

district2@co.monterey.ca.us

district3@co.monterey.ca.us

district4@co.monterey.ca.us

district5@co.monterey.ca.us

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On May 6, 2024, the County published their 985-page Regional Housing Needs Assessment (RHNA) in response to the State's mandate. The work for this proposal started nearly two years ago, was known to be coming for several years, and the County spent nearly \$2M on consultants to prepare this proposal. With all that, they are still 6 months late.

On May 15, 2024, the County's Planning Commission reviewed a presentation by the staff on their work. The proposal was resoundingly rejected by the commission and virtually everyone in attendance (except by one developer).

The Potential Long-Term Effects of the Proposal

The staff analyzed that the County needed 3326 new housing units in the next 8 years. Commissioner Daniels rightly asked, "how many units are currently in the pipeline?" which would reduce this number. After subtracting the "pipeline" units, the ACTUAL need in the County is 1269 units. Adding the state-required 15% buffer should raise the proposal to 1460 units. But the staff is proposing that we build over 10,000 housing units!

While we can always build more units than proposed, it is imperative to propose the minimum number that the State mandates. The reason for this is very simple: once the plan is accepted, the State will require the County to rezone all the sites identified in the proposal into high density residential zones with up to 20 housing units per acre. Even more concerning is that this rezoning may be permanent! In fact, Director Spenser stated that "*it is*

difficult to reverse zoning decisions.” While we may think that the Planning Commission can control the number of units built through the permitting process, the State is already planning to move local control of RHNA identified sites to the State’s HCD. Telling the State that we need 10,000 homes will virtually guarantee that permits for more housing than we need will eventually be approved.

The only possible reason for advocating for 10,000 units is to subsidize the cost of building low-income housing units. Building 10,000 units is essentially building ten East Garrison communities. Can the Monterey Peninsula support that many new homes? Do we have the infrastructure for it? Can the environment survive it? The answer to all these questions is “no”.

Funding for Affordable Housing

Commissioners Daniels and Diehl point out that, for the past several decades, the County has been using the Inclusionary Housing Ordinance (IHO) as a method to fund the building of Affordable Housing. The IHO requires developers to build one “affordable” house for every four “market” houses that they build. Both commissioners pointed out that this program has been an abject failure. It has failed to build the affordable housing that we need. There must be a better way to achieve the construction of 1200 affordable housing units without destroying the community that we love. At the May 15 meeting, Commissioner Diehl said: we *“cannot support going forward with the IHO as it exists now as a basis for identifying the number of sites as we see here.”*

In March, Director of Housing, Mr. Craig Spenser was asked, “how much financial support would a developer need to build affordable housing and still make a profit?” His answer was “around \$250,000 for each unit” If one assumes that this is roughly correct, it is simple arithmetic to estimate that we need roughly \$35M per year in financial assistance to achieve our housing needs. Our County has a population of roughly 500,000 people. Distributed over the population, this is \$75 per person per year or \$6 per person per month. Obviously, there are other funding methods and algorithms that may be more equitable. In a County as large as ours, this can be done.

Objections for the lack of transparency

Our communities were not informed that there was any discussion regarding the County's site selection process, the County's proposal and how it would affect our communities. In fact, when we accidentally learned of the activity and then reached out to the staff (in early December 2023), we were told "it is too late to provide input or for the County to change its proposal." The staff told us that notices were posted on the County's website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn't enough time to hear our concerns.

Supervisor Mary Adams arranged a meeting between District 5 residents and the Staff in March. Residents provided the Staff with a list of questions, and it took the Staff 6 weeks after the meeting for them to reply.

The County Staff informed us that there were nine "pop-up" events but none in our community and the times and locations of these "pop-up" events were not advertised to us.

According to the proposal, the County Staff had multiple meetings with "stake holders" which are curiously absent of property tax-paying homeowners and residents of the affected areas, but developers were included. Per the proposal, the stake holders included:

- i. Carmel Valley Association
- ii. Tribal Communities
- iii. Fair Housing Providers
- iv. Housing Advocacy and Community Organizations
- v. Affordable Housing Managers
- vi. Ag-based business advocacy groups
- vii. Hospitality community
- viii. Market housing developers
- ix. Affordable housing developers

There are multiple sites (61-69 along HW 68 near Olmsted Road) in the proposal that identify a parcel of land with an existing residence. In the proposal, the staff assumes that the existing houses on several of these sites will be “removed”. I understand that there are other sites in Carmel Valley that have similar designations. To my knowledge, none of these site owners have been informed of the Staff’s recommendations. Several people showed up at the Planning Commission meeting on May 15 and informed the Planning Commission that they had just learned of these proposals and their impact to their properties within the previous 72 hours.

The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population. How can one base policy and procedures with such a low turnout?

This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community and in particular, the tax-paying property owners of the county.

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1269 units (see table below which is derived from the proposal) and only 1096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower income categories is 1460. But the County is proposing to develop over 10,000 housing units.

Housing type	Identified Need	Units In Process	Actual Need
Extremely low	1070	184	886
Low	700	490	210
Moderate	420	247	173
Above Market	1136	1345	-209

The Inclusionary Housing Ordinance (IHO) is used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units would be built. This formula forces the County to approve the development of housing units **that are not needed and only amplify sprawl and negatively impact the environment**. As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades.

The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. I estimate that the County needs approximately \$35M per year to support the development of these units (1100 units x \$250K/unit divided by 8 years; note that moderate units do not need additional funding). This is not an insurmountable amount. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and a monstrous environmental impact.

Errors in the recommended sites

The published guidelines for the RHNA proposal include instructions to:

- 1) Protect desirable land uses
- 2) Prevent soil erosion and enhance water quality
- 3) Minimize risks from fire

This proposal fails on all three counts.

Furthermore, the proposal fails miserably on infrastructure requirements.

The Housing Element Sites Inventory Guidebook specifically states that the County is to:

Provide in the analysis a general description of any known environment or other features (floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development

viability of the identified sites.....The analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities.

and

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program plan

The Staff's proposal fails on both requirements. Sites with floodplains, protected wetlands, oak tree preserves, and very high fire hazard are included in the proposal. Furthermore, sites without water resources, sewers etc., are also included. These sites need to be removed from the proposal.

Objections to sites 1-4 and 61-68 in the "South of Airport" vicinity

Taken together these sites have a capacity of 1835 units in the RHNA proposal. This is approximately 20% of the entire County's proposal. If this were to be completed, a fair estimate for the population of the proposed South of Airport housing would be approximately 3700 people, all located within 110 acres (according to the proposal), which is 0.17 square miles. This is a population density of over 19,000 people/sq mile. In comparison, the population density of the City of Monterey is only 3,285 people/sq mile. In fact, the proposed South of Airport housing would have a higher population density than the city of San Francisco (18,633 people/sq mile).

The negative impact on the environment cannot be overstated.

There are numerous problems with the proposal for these sites. Specifically, regarding Sites 61-68:

- a. These sites will account for 417 housing units.
- b. The proposal is to remove existing houses to build affordable housing. The text regarding several of these seven sites says: “***The existing development (house) at this site is assumed to be removed for higher density housing development to occur.***”
Has the staff informed the homeowners and residents that the County is considering removing them from their properties?
- c. The entrances and exits from these properties are single lane roads (not larger than a driveway and can only accommodate a single car in one direction) directly onto HW68. **In case of an emergency, how are approximately 750 cars going to exit using a few single lane driveways onto Highway 68?**

Regarding all 12 sites in the “South of Airport” area (sites 1-4 and 61-68):

All sites fail on AB 1397 “realistic sites”. The State requires that all sites proposed be “realistic sites” and these sites all fail for the following reasons:

- **Environmentally sensitive area:** The Big Sur Land Trust (BSLT) has recently purchased a 50-acre parcel of land that is contiguous to these parcels and, together, form a wildlife corridor and essential fire break. The features of the purchased land will also be true for these parcels. These features include:
 - a. Preserving the cultural importance of the land to the Ohlone/Costanoan-Esselen Nation.
 - b. The wetlands conserved on this property trap sediment, improve water quality and decrease the flood risk for the downstream communities along the Canyon Del Rey watershed. These ecosystem benefits will help reduce climate change impacts related to increased storm flows of water and sediment.
 - c. The wetlands also help to sequester carbon, and the property’s location in a wildlife corridor will allow species to move across landscapes to find food, water and shelter.

- d. Proper management of this land will reduce wildfire risk for the surrounding wildland urban interface of Monterey and Del Rey Oaks.
 - e. By preventing potential development, the BSLT is protecting important habitats that are part of a valuable wildlife corridor. Deer, coyote, mountain lions and black bears have been spotted on the land.
 - f. This preservation supports the State's 30×30 goals of protecting 30% of California lands and waters by 2030,
- **Water:** Recently, a developer investigated the availability of water on parcels 2-4 by drilling, for the purpose of building a development using the Affordable Housing Overlay. The study concluded that there was insufficient water to proceed without additional water permits (page 3-42 in the proposal). However, no additional water permits are available in the county. **How does the County propose to build approximately 10,000 housing units without water, and specifically, over 1800 units on the South of Airport sites?** As stated in the proposal, water treatment is expensive. ***A more realistic approach would be to focus on locations where water is already available.*** This can be achieved by focusing on redevelopment of existing buildings and converting them into affordable housing units (as has been done in Salinas at the Rabobank project).
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Arthur B. Cook

From: [Caroline DePalatis](#)
To: [293-pchearingcomments](#); [100-District 1 \(831\) 647-7991](#); [100-District 2 \(831\) 755-5022](#); [100-District 3 \(831\) 385-8333](#); [100-District 4 \(831\) 883-7570](#); [100-District 5 \(831\) 647-7755](#)
Subject: Comments for the Jan 4 Supervisor Meeting regarding the RHNA proposal
Date: Wednesday, May 29, 2024 8:46:34 PM

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In March, I asked Director of Housing, Mr. Craig Spenser, “how much financial support would a developer need to build affordable housing and still make a profit?” His answer was “around \$250,000 for each unit” If one assumes that this is roughly correct, it is simple arithmetic to estimate that we need roughly \$35M per year in financial assistance to achieve our housing needs. Our County has a population of roughly 500,000 people. Distributed over the population, this is \$75 per person per year or \$6 per person per month. Obviously, there are other funding methods and algorithms that may be more equitable. In a County as large as ours, this can be done.

Objections for the lack of transparency

Our communities were not informed that there was any discussion regarding the County’s site selection process, the County’s proposal and how it would affect our communities. In fact, when we accidentally learned of the activity and then reached out to the staff (in early December 2023), we were told “it is too late to provide input or for the County to change its proposal.” The staff told us that notices were posted on the County’s website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn’t enough time to hear our concerns.

I reached out to my Supervisor in February for a meeting which she arranged with the Staff four weeks later (in March). We provided the Staff with a list of questions, and it took the Staff 6 weeks after the meeting for them to reply.

The County Staff informed me that there were nine “pop-up” events but none in our community and the times and locations of these “pop-up” events were not advertised to us.

According to the proposal, the County Staff had multiple meetings with “stake holders” which are curiously absent of property tax-paying homeowners and residents of the affected areas, but developers were included. Per the proposal, the stakeholders included:

- i. Carmel Valley Association
- ii. Tribal Communities
- iii. Fair Housing Providers
- iv. Housing Advocacy and Community Organizations
- v. Affordable Housing Managers
- vi. Ag-based business advocacy groups
- vii. Hospitality community
- viii. Market housing developers
- ix. Affordable housing developers

There are multiple sites (61-69 along HWY 68 near Olmsted Road) in the proposal that identify a parcel of land with an existing residence. In the proposal, the staff assumes that the existing houses on several of these sites will be “removed”. I understand that there are other sites in Carmel

Valley that have similar designations. To my knowledge, none of these site owners have been informed of the Staff's recommendations. Several people showed up at the Planning Commission meeting on May 15 and informed the Planning Commission that they had just learned of these proposals and their impact to their properties within the previous 72 hours.

The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population. How can one base policy and procedures with such a low turnout? This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community and in particular, the tax-paying property owners of the county.

Calculation and staff recommendations for the County
As mentioned earlier, the staff-reported need (according to the report) is 3764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1269 units (see table below which is derived from the proposal) and only 1096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower income categories is 1460. But the County is proposing to develop over 10,000 housing units.

Housing type Identified
Need

Units In
Process

Actual
Need

Extremely low	1070	184	886
Low	700	490	210
Moderate	420	247	173
Above Market	1136	1345	-209

The Inclusionary Housing Ordinance (IHO) is used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units would be built. This formula forces the County to approve the development of housing units that are not needed and only amplify sprawl and negatively impact the environment. As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades.

The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. I estimate that the County needs approximately \$35M per year to support the development of these units (1100 units x \$250K/unit divided by 8 years; note that moderate units do not need additional funding). This is not an insurmountable amount. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and an monstrous environmental impact.

Errors in the recommended sites

The published guidelines for the RHNA proposal include instructions to:

- 1) Protect desirable land uses
- 2) Prevent soil erosion and enhance water quality

3) Minimize risks from fire

This proposal fails on all three counts.

Furthermore, the proposal fails miserably on infrastructure requirements.

The Housing Element Sites Inventory Guidebook specifically states that the County is to:

Provide in the analysis a general description of any known environment or other features (floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites.....The analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities.

and

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program plan

The Staff's proposal fails on both requirements. Sites with floodplains, protected wetlands, oak tree preserves, and very high fire hazard are included in the proposal. Furthermore, sites without water resources, sewers etc., are also included. These sites need to be removed from the proposal.

Objections to sites 1-4 and 61-68 in the "South of Airport" vicinity
Taken together, these sites have a capacity of 1835 units in the RHNA proposal. This is approximately 20% of the entire County's proposal. If this were to be completed, a fair estimate for the population of the proposed South of Airport housing would be approximately 3700 people, all located within 110 acres (according to the proposal), which is 0.17 square miles. This is a population density of over 19,000 people/sq mile. In comparison, the population density of the City of Monterey is only 3,285 people/sq mile. In fact, the proposed South of Airport housing would have a higher population density than the city of San Francisco (18,633 people/sq mile). The negative impact on the environment cannot be overstated.

There are numerous problems with the proposal for these sites. Specifically, regarding Sites 61-68:

- a. These sites will account for 417 housing units.
- b. The proposal is to remove existing houses to build affordable housing. The text regarding several of these seven sites says: "The existing development (house) at this site is assumed to be removed for higher density housing development to occur." Has the staff informed the homeowners and residents that the County is considering removing them from their properties?
- c. The entrances and exits from these properties are single lane roads (not larger than a driveway and can only accommodate a single car in one direction) directly onto HW68. In case of an emergency, how are approximately 750 cars going to exit using a single lane driveway onto Highway 68?

Regarding all 12 sites in the “South of Airport” area (sites 1-4 and 61-68): All sites fail on AB 1397 “realistic sites”. The State requires that all sites proposed be “realistic sites” and these sites all fail for the following reasons:

- Environmentally sensitive area: The Big Sur Land Trust (BSLT) has recently purchased a 50-acre parcel of land that is contiguous to these parcels and, together, form a wildlife corridor and essential fire break. The features of the purchased land will also be true for these parcels. These features include:

- a. Preserving the cultural importance of the land to the Ohlone/Costanoan-Esselen Nation.

- b. The wetlands conserved on this property trap sediment, improve water quality and decrease the flood risk for the downstream communities along the Canyon Del Rey watershed. These ecosystem benefits will help reduce climate change impacts related to increased storm flows of water and sediment.

- c. The wetlands also help to sequester carbon, and the property’s location in a wildlife corridor will allow species to move across landscapes to find food, water and shelter.

- d. Proper management of this land will reduce wildfire risk for the surrounding wildland urban interface of Monterey and Del Rey Oaks.

- e. By preventing potential development, the BSLT is protecting important habitats that are part of a valuable wildlife corridor. Deer, coyote, mountain lions and black bears have been spotted on the land.

- f. This preservation supports the State’s 30×30 goals of protecting 30% of California lands and waters by 2030,

- Water: Recently, a developer investigated the availability of water on parcels 2-4 by drilling, for the purpose of building a development using the Affordable Housing Overlay. The study concluded that there was insufficient water to proceed without additional water permits

(page 3-42 in the proposal). However, no additional water permits are available in the county. How does the County propose to build approximately 10,000 housing units without water, and specifically, over 1800 units on the South of Airport sites? As stated in the proposal, water treatment is expensive. A more realistic approach would be to focus on locations where water is already available. This can be achieved by focusing on redevelopment of existing buildings and converting them into affordable housing units (as has been done in Salinas at the Rabobank project).

- Traffic: Traffic on HW 68 is already congested. Bringing affordable housing closer to jobs is certainly the correct approach but doing so by gridlocking HW 68 is not reasonable. The additional units proposed for the “South of Airport” area (1835 total units) would add over 3500 cars to the intersection of HW 68 with Olmsted Road and Josselyn Canyon Road. Gridlocking HW 68 at Olmsted Road would severely impact ingress and egress to and from Monterey Regional Airport, an economic lifeline to the County. Furthermore, in case of an emergency, it would be unfeasible to exit these properties.

- **Air quality:** The congested traffic will cause significant deterioration in local air quality, both to onsite residents of the new development and to nearby existing populations. The specific pollutants of public health concern are sulfur dioxide, oxides of nitrogen, carbon monoxide and carbon fiber from tires. Approximately 20,000 deaths per annum occur in the United States from these air pollutants. The additional pollutants will certainly decrease the health of this community.

- **Fire hazard:** This area is in a “high fire danger zone” and is adjacent to an “extremely high fire danger zone.” At present, it is virtually impossible to obtain fire insurance for most houses in the area. Homeowners and residents in this area will have to bear the burden of self-insuring but affordable housing is for low-income households who cannot afford to self-insure. Additionally, one of the important functions of the existing greenbelt zoning gives the entire community an important firebreak. CALFIRE depends on this parcel for fire protection of this whole region. These parcels are effectively the last line of defense to repel a wildfire from entering the City of Monterey. These parcels were used extensively by CALFIRE for staging during the last major wildfire.

- **Airport noise:** The takeoff noise of individual flights over the subject parcel needing rezoning could reach 85 decibels or higher. Not only is this level high enough to cause progressive hearing loss to the 3000+ residents of the subject parcels, but that sound level would make a simple child pedestrian crossing of Olmstead a life-threatening event for both children and seniors, who may cross Olmstead frequently but cannot hear oncoming cars due to the noise from plane engines.

- **Vanishing Greenbelt.** The removal of this greenbelt is a significant adverse impact aesthetically and visually as well as a loss of habitat for many keystone animal species that can be observed on the subject parcel. Frequent observations occur of Apex/keystone species such as Mountain Lion, Bobcat and Coyote as well as many avian species of special interest, such as red shouldered hawks and peregrine falcons.

- **Safety (flight crash risk):** Within the past 3 years, a plane from Monterey Airport crashed into a single-family residence located approximately 1 mile south of the airport. Fortunately, no one was home at the time and the casualties were limited to the pilot and her passenger. This will not be the case with such a high-density development which is far closer to the airport. In the event of a similar accident hitting the proposed development, the casualties would number in the hundreds if not thousands.

- **Carcinogenic Aquifer Plume emanating from Fort Ord.** It is well established that there are several carcinogenic and toxic chemicals in the groundwater emanating from Fort Ord. It is also known that this subsurface water plume is presently moving in the direction of the proposed rezoning parcel, if not already present beneath the subject parcel. This is a serious threat to residents of the subject parcels, particularly to children who will predictably explore the soil of their neighborhood.

Errors in proposal for all the South of Airport sites:

The parcels are all graded on an Amenity Point System which is based upon distances to needed amenities, such as grocery stores, jobs and doctors' offices. The stated distances in the proposal from these sites to these amenities are incorrect and hence, also the subsequent Amenity Grade. For these 12 sites, the description identifies a doctor's office that does not exist and distances to amenities that are incorrect. The table below illustrates the errors, where the Distance in the Proposal is compared to the Actual Distance:

Entity Distance in
Proposal
(miles)

Actual Distance
(miles)

Safeway 13
Doctors on Duty
(Monterey)
15

Doctors on Duty (Del
Rey)

1 DOES NOT EXIST

Seaside Family Health
Clinic

0.53

Foothill School 0.5 Not Available

The Foothill Elementary School is not an open school. The City of Monterey closed the site several years ago. It is currently leased to a chartered school and is therefore unavailable for public use. The County cannot use this in the amenity point system.

Errors such as the above make the reader question the validity of the entire document. What other errors or omissions are in this document which was 'hurried through' and is now being "rushed through for approval" because it is six-months late by the Staff and the consultants?

Summary

The Staff and the Supervisors have not provided its constituents with a transparent process, nor have they actively included the county's major stakeholders, that is, the tax-paying residents. When reached by members of the public, the staff reported that the proposal could not be amended. When asked for meetings, the staff were typically too busy and responded to our questions in months rather than days.

The Staff spent nearly \$2M on consultants from Irvine, CA, and this proposal appears to be nothing more than an internet search using "Google Maps" and "Siri". The sloppiness of this report cannot be overstated. The viability of the sites was not confirmed. In many cases, the slopes of these sites are over 25 degrees, which makes them virtually impossible to build upon. Sites inside "extremely high fire danger zones" should have been removed. Sites with archeological significance, or wetlands, should have been removed. The number of errors in this report is appalling. This makes

one question how the County is spending the tax-payer money.

The County MUST find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle and upper income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1100 affordable housing units is not unreachable. This can be supported by beginning to think “outside the box” with funding and focusing on redeployment of existing sites with existing water permits.

Finally, the Supervisors CANNOT accept an analysis and proposal that is riddled with errors. Commissioner Diehl said it succinctly when she summarized that “if you want something badly, that’s what you’re going to get. This is too important to get it wrong.”

Caroline DePalatis

7120 Oak Tree Pl
Monterey, CA 93940

From: [geoff smith](#)
To: [293-pchearingcomments](#)
Cc: [100-District 2 \(831\) 755-5022](#); [100-District 3 \(831\) 385-8333](#); [100-District 4 \(831\) 883-7570](#); [100-District 5 \(831\) 647-7755](#); [100-District 1 \(831\) 647-7991](#)
Subject: Subject: comments for June 4 supervisor meeting regarding RHNA proposal and Housing Element draft
Date: Wednesday, May 29, 2024 10:53:46 AM
Attachments: [Monterey County HE.docx](#)

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

see my letter attached. I am homeowner in Monterey county.

--

contact information:

Geoff Smith

7810 Monterra Oaks Rd

Monterey, CA 939

C: 970 406 0444

Email address: geoff@oldskidog.com

May 29, 2024

Attn: Planning Commission Members

pchearingcomments@co.monterey.ca.us

district1@co.monterey.ca.us

district2@co.monterey.ca.us

district3@co.monterey.ca.us

district4@co.monterey.ca.us

The draft Housing Element plan submitted to meet RHNA criteria fails both its statutory mandates and its own administrative protocols.

Parcels may be included if and only if they are both “suitable” and “available” per Government Code (GC) section 6558. Parcels may not be listed because someday and somehow they might become available to complete development within the 8 year statutory period.

Here, over 10,000 units are to be developed to meet a need of 1269 units. The state has not declared that Monterey County must plan for 10,000 units, generating a surplus over scientifically determined estimates that only 1269 “affordable” units are needed. Monterey County does not need 8800 surplus middle/higher income units.

And, the 10,000 units are not “available” simply because the development requires speculative and currently unknown financial commitments from private parties yet to be determined and public financing yet to be committed. This is particularly true with regard to sites 1-4 and 61-68 in the “south of airport” area. Also, how can land be “available” when there are existing homes that have to be acquired through undefined means and timelines and then razed for construction.

The other requirement, “suitability” is being virtually ignored. No parcel is suitable without water, and there is a moratorium in place for installation of new meters. The fact that there “might” be additional water available during the next 8 years does not make the parcel presently “suitable.”

“Suitability” further requires the Housing Element to address “potential” or “actual” government constraints. The most obvious government constraint is whether or not any parcel will survive the statutory permitting process. There is glaringly no discussion of how any parcel will meet permitting requirements. Sites 1-4 and 61-68 have significant environmental impacts due to the presence of wetlands, animal corridors, fire hazards, access to fire stations, and traffic safety. It is galling to think that roughly 750 additional cars can evacuate onto highway 68 in case of wildfire or other emergency.

Overall the governing statute wants the inventory in the Housing Element to have a “realistic and demonstrated potential for redeveloping during the planning period.” Without a concrete plan for public and private financing, and there is none, building 10,000 units to get 1269 “affordables” is a pipedream. I suggest that the flaw is really that the state is burdening the cities and counties, yet not providing the financing, both public and private, to get the job done.

Administratively, the lack of inclusiveness in this draft Housing Element is profound. Lots of meetings with developers but none with homeowners. And, this letter is not actually going to be considered, is it? It just goes in a file sent to Sacramento along with the approved Housing Element.

From: [Gary Weitz](#)
To: [293-pchearingcomments](#)
Subject: Objection to Monterey County Low Cost Housing Plan
Date: Thursday, May 30, 2024 7:33:57 AM

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

To: Monterey County Supervisors

Your Staff's Affordable Housing (RHNA) Proposal must be rejected, and I object for the following reasons. On May 15, 2024, the County's Planning Commission reviewed a presentation by the staff on their work. The proposal was resoundingly rejected by the commission and virtually everyone in attendance (except by one developer).

The Potential Long-Term Effects of the Proposal

The staff analyzed that the County needed 3,326 new housing units in the next 8 years. Commissioner Daniels rightly asked, "how many units are currently in the pipeline?" which would reduce this number. After subtracting the "pipeline" units, the ACTUAL need in the County is 1,269 units. Adding the state-required 15% buffer should raise the proposal to 1460 units. But the staff is proposing that Monterey build over 10,000 housing units!

While we can always build more units than proposed, it is imperative to propose the minimum number that the State mandates. The reason for this is very simple: once the plan is accepted, the State will require the County to rezone all the sites identified in the proposal into high density residential zones with up to 20 housing units per acre. Even more concerning is that this rezoning may be permanent! In fact, Director Spenser stated that "*it is difficult to reverse zoning decisions.*" While we may think that the Planning Commission can control the number of units built through the permitting process, the State is already planning to move local control of RHNA identified sites to the State's HCD. Telling the State that Monterey need 10,000 homes will virtually guarantee that permits for more housing will be issued than what is needed.

The only possible reason for advocating for 10,000 units is to subsidize the cost of building low-income housing units. Building 10,000 units is essentially building ten East Garrison communities. Can the Monterey Peninsula support that many new homes? Does the Monterey Peninsula have the infrastructure and water for this massive development? Can the environment survive it? The answer to all these questions is "no".

Objections for the lack of transparency

Our communities were not informed that there was any discussion regarding the County's site selection process, the County's proposal and how it would affect our communities. In fact, when we accidentally learned of the activity and then reached out to the staff (in early December 2023), we were told "it is too late to provide input or for the County to change its proposal." The staff told us that notices were posted on the County's website. This conversation occurred nearly 6 months before the proposal was published

The County Staff stated that there were nine "pop-up" events but none in our community were notified of the times and locations of these "pop-up" events. Additionally they were not advertised to the public.

According to the proposal, the County Staff had multiple meetings with "stake holders"

which are curiously absent of property tax-paying homeowners and residents of the affected areas, but developers were included. Per the proposal, the stake holders included:

- Organizations
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The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population. How can one base policy and procedures with such a low turnout? This was not a transparent effort, and certainly not developed with the Monterey County tax payers in mind.

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3,764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1,269 units (see table below which is derived from the proposal) and only 1,096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower income categories is 1460. But Monterey County is proposing to develop over 10,000 housing units.

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approximately 750 cars going to exit using a single lane driveway onto Highway 68?

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Entity	Distance in Proposal (miles)	Actual Distance (miles)
Safeway	1	3
Doctors on Duty (Monterey)	1	5
Doctors on Duty (Del Rey)	1	DOES NOT EXIST
Seaside Family Health Clinic	0.5	3
Foothill School	0.5	Not Available

The Foothill Elementary School is not an open school. The City of Monterey closed the site several years ago. It is currently leased to a chartered school and is therefore unavailable for public use. **The County cannot use this in the amenity point system.**

Errors such as the above make the reader question the validity of the entire document.

What other errors or omissions are in this document which was ‘hurried through’ and is now being ‘rushed through for approval’ because it is six-months late by the Staff and the consultants?

Summary

The Staff and the Supervisors have not provided its constituents with a transparent process, nor have they actively included the county’s major stakeholders, that is, the tax-paying residents. When reached by members of the public, the staff reported that the proposal could not be amended. When asked for meetings, the staff were typically too busy and responded to our questions in months rather than days.

The Staff spent nearly \$2M on consultants from Irvine, CA, and this proposal appears to be nothing more than an internet search using “Google Maps” and “Siri”. The sloppiness of this report cannot be overstated. The viability of the sites was not confirmed. In many cases, the slopes of these sites are over 25 degrees, which makes them virtually impossible to build upon. Sites inside “extremely high fire danger zones” should have been removed. Sites with archeological significance, or wetlands, should have been removed. The number of errors in this report is appalling. This makes one question how the County is spending tax-payer money.

The County MUST find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle and upper income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1,100 affordable housing units is not unreachable. This can be supported by beginning to think “outside the box” with funding and focusing on redeployment of existing sites with existing water permits.

Finally, the Supervisors CANNOT accept an analysis and proposal that is riddled with errors.

Thank you,

Gary J Weitz

From: [Linda Ausonio Grier](#)
To: [293-pchearingcomments](#)
Subject: GP 6th cycle housing
Date: Friday, May 31, 2024 10:10:27 AM

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I believe I heard mentioned in the last meeting that potential housing site are to be designated regardless of infrastructure and water restrictions. This is a ridiculous mandate from the state. Creating housing where water already at issue and restricted will create a larger issue in the future. The folks against all water solutions need to understand that this will exacerbate the lack housing issues.

We have a few infill parcels available that we could develop in Castroville, but the permitting process and exorbitant fees prevent us from doing to. We keep hearing talk about stream lining the process and reevaluation of fees, but we have yet to see any progress. One cannot build affordable housing when required to build the Taj mahal with all electric appliances, EV charging, solar requirements, motion sensor lighting, etc.

We also have parcel on Boronda that could be housing, we are currently designing for commercial use. The county and the City of Salinas can not decide which should be the lead on decision making. The parcel is in county domain, but falls under the sphere of influence for Salinas, which wants their say. Most currently with this particular project, the governmental agencies want to require us to improve Boronda Road to today's standards, however the county has not maintained the road for decades as it should have. Address these types of issues then housing can be addressed.

Linda A. Grier
Aladin Properties, LP
11420 A Commercial Parkway
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From: [Randy Hamilton](#)
To: [100-District 1 \(831\) 647-7991](#); [100-District 2 \(831\) 755-5022](#); [100-District 3 \(831\) 385-8333](#); [100-District 4 \(831\) 883-7570](#); [100-District 5 \(831\) 647-7755](#); [293-phearingcomments](#)
Subject: Fwd: Board of Supervisors Review of Housing Element
Date: Wednesday, May 29, 2024 3:13:13 PM

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May 29, 2024

Dear Supervisors,

The staff's Affordable Housing (RHNA) Proposal must be rejected.

On May 15, 2024, the Monterey County Planning Commission reviewed the county's May 6th 2024 plan and rejected it. If the Planning commission believes it is severely flawed that should be enough to send it back for revision.

I too believe it is flawed and totally reject this plan as written.

I have lived in the Oak Tree Development and have many concerns but will focus my comments to three main ones:

1. Lack of transparency. Although the consultants spent two and a half years developing their plan, they failed to obtain adequate input from those affected. NO one in our neighborhood was contacted for feedback. When contacted by members of the public, the staff reported that the proposal could not be amended.
2. Fire. No evacuation plan exists that takes the County and the City's existing and proposed development that affects the Olmsted/Airport/Hwy 68 area. We live in an extremely high risk fire area (edge of a Pine preserve, and Jack's Peak Park) which is evident in many folks being denied their current insurance or in our case, significance yearly costs increases. No one wants another "Paradise" type event.
3. 10,000 housing units in the proposal is flawed. The staff analyzed that the County needed 3326 housing units. Commissioner Daniels rightly asked, "how many units are currently in the pipeline?" which would reduce this number. After subtracting the "pipeline" units, the ACTUAL , need in the County is 1269 units. Adding in the state -required 15% buffer should raise the proposal to 1460 units. BUT, the staff is proposing that we build over 10,000 housing units.

There are many other issues such as water, traffic, wildlife, that also need proper evaluation.

Thanks for taking the time to consider my thoughts,
Randy Hamilton
7128 Oak Tree Place, Monterey, CA
Randym.hamilton@gmail.com

From: [Michael Healy](#)
To: [293-pchearingcomments](#); [100-District 1 \(831\) 647-7991](#); [100-District 2 \(831\) 755-5022](#); [100-District 3 \(831\) 385-8333](#); [100-District 4 \(831\) 883-7570](#); [100-District 5 \(831\) 647-7755](#)
Subject: Staff Housing Must Be Rejected
Date: Thursday, May 30, 2024 7:47:21 AM
Attachments: [Letter to the Supervisors for June 4 2024 meeting .docx](#)

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Please see attached.

The Staff's Affordable Housing (RHNA) Proposal must be rejected.

On May 6, 2024, the County published their 985-page Regional Housing Needs Assessment (RHNA) in response to the State's mandate. The work for this proposal started nearly two years ago, was known to be coming for several years, and the County spent nearly \$2M on consultants to prepare this proposal. With all that, they are still 6 months late.

On May 15, 2024, the County's Planning Commission reviewed a presentation by the staff on their work. The proposal was resoundingly rejected by the commission and virtually everyone in attendance (except by one developer).

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The staff analyzed that the County needed 3326 new housing units in the next 8 years. Commissioner Daniels rightly asked, "how many units are currently in the pipeline?" which would reduce this number. After subtracting the "pipeline" units, the ACTUAL need in the County is 1269 units. Adding the state-required 15% buffer should raise the proposal to 1460 units. But the staff is proposing that we build over 10,000 housing units!

While we can always build more units than proposed, it is imperative to propose the minimum number that the State mandates. The reason for this is very simple: once the plan is accepted, the State will require the County to rezone all the sites identified in the proposal into high density residential zones with up to 20 housing units per acre. Even more concerning is that this rezoning may be permanent! In fact, Director Spenser stated that "*it is difficult to reverse zoning decisions.*" While we may think that the Planning Commission can control the number of units built through the permitting process, the State is already planning to move local control of RHNA identified sites to the State's HCD. Telling the State that we need 10,000 homes will virtually guarantee that permits for more housing than we need will eventually be approved.

The only possible reason for advocating for 10,000 units is to subsidize the cost of building low-income housing units. Building 10,000 units is essentially building ten East Garrison communities. Can the Monterey Peninsula support

that many new homes? Do we have the infrastructure for it? Can the environment survive it? The answer to all these questions is “no”.

Funding for Affordable Housing

Commissioners Daniels and Diehl point out that, for the past several decades, the County has been using the Inclusionary Housing Ordinance (IHO) as a method to fund the building of Affordable Housing. The IHO requires developers to build one “affordable” house for every four “market” houses that they build. Both commissioners pointed out that this program has been an abject failure. It has failed to build the affordable housing that we need. There must be a better way to achieve the construction of 1200 affordable housing units without destroying the community that we love. At the May 15 meeting, Commissioner Diehl said: we *“cannot support going forward with the IHO as it exists now as a basis for identifying the number of sites as we see here.”*

In March, I asked Director of Housing, Mr. Craig Spenser, “how much financial support would a developer need to build affordable housing and still make a profit?” His answer was “around \$250,000 for each unit” If one assumes that this is roughly correct, it is simple arithmetic to estimate that we need roughly \$35M per year in financial assistance to achieve our housing needs. Our County has a population of roughly 500,000 people. Distributed over the population, this is \$75 per person per year or \$6 per person per month. Obviously, there are other funding methods and algorithms that may be more equitable. In a County as large as ours, this can be done.

Objections for the lack of transparency

Our communities were not informed that there was any discussion regarding the County’s site selection process, the County’s proposal and how it would affect our communities. In fact, when we accidentally learned of the activity and then reached out to the staff (in early December 2023), we were told “it is too late to provide input or for the County to change its proposal.” The staff

told us that notices were posted on the County's website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn't enough time to hear our concerns.

I reached out to my Supervisor in February for a meeting which she arranged with the Staff four weeks later (in March). We provided the Staff with a list of questions, and it took the Staff 6 weeks after the meeting for them to reply.

The County Staff informed me that there were nine "pop-up" events but none in our community and the times and locations of these "pop-up" events were not advertised to us.

According to the proposal, the County Staff had multiple meetings with "stake holders" which are curiously absent of property tax-paying homeowners and residents of the affected areas, but developers were included. Per the proposal, the stake holders included:

- i. Carmel Valley Association
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- vi. Ag-based business advocacy groups
- vii. Hospitality community
- viii. Market housing developers
- ix. Affordable housing developers

There are multiple sites (61-69 along HW 68 near Olmsted Road) in the proposal that identify a parcel of land with an existing residence. In the proposal, the staff assumes that the existing houses on several of these sites will be "removed". I understand that there are other sites in Carmel Valley that have similar designations. To my knowledge, none of these site owners have been informed of the Staff's recommendations. Several people showed up at the Planning Commission meeting on May 15 and informed the Planning

Commission that they had just learned of these proposals and their impact to their properties within the previous 72 hours.

The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population. How can one base policy and procedures with such a low turnout?

This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community and in particular, the tax-paying property owners of the county.

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1269 units (see table below which is derived from the proposal) and only 1096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower income categories is 1460. But the County is proposing to develop over 10,000 housing units.

Housing type	Identified Need	Units In Process	Actual Need
Extremely low	1070	184	886
Low	700	490	210
Moderate	420	247	173
Above Market	1136	1345	-209

The Inclusionary Housing Ordinance (IHO) is used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units would be built. This formula forces the County to approve the development of housing units **that are not needed and only amplify sprawl and negatively impact the environment.** As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades.

The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. I estimate that the County needs approximately \$35M per year to support the development of these units (1100 units x \$250K/unit divided by 8 years; note that moderate units do not need additional funding). This is not an insurmountable amount. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and an monstrous environmental impact.

Errors in the recommended sites

The published guidelines for the RHNA proposal include instructions to:

- 1) Protect desirable land uses
- 2) Prevent soil erosion and enhance water quality
- 3) Minimize risks from fire

This proposal fails on all three counts.

Furthermore, the proposal fails miserably on infrastructure requirements.

The Housing Element Sites Inventory Guidebook specifically states that the County is to:

Provide in the analysis a general description of any known environment or other features (floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites.....The analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities.

and

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program plan

The Staff's proposal fails on both requirements. Sites with floodplains, protected wetlands, oak tree preserves, and very high fire hazard are included in the proposal. Furthermore, sites without water resources, sewers etc., are also included. These sites need to be removed from the proposal.

Objections to sites 1-4 and 61-68 in the "South of Airport" vicinity

Taken together these sites have a capacity of 1835 units in the RHNA proposal. This is approximately 20% of the entire County's proposal. If this were to be completed, a fair estimate for the population of the proposed South of Airport housing would be approximately 3700 people, all located within 110 acres (according to the proposal), which is 0.17 square miles. This is a population density of over 19,000 people/sq mile. In comparison, the population density of the City of Monterey is only 3,285 people/sq mile. In fact, the proposed South of Airport housing would have a higher population density than the city of San Francisco (18,633 people/sq mile).

The negative impact on the environment cannot be overstated.

There are numerous problems with the proposal for these sites. Specifically, regarding Sites 61-68:

- a. These sites will account for 417 housing units.
- b. The proposal is to remove existing houses to build affordable housing. The text regarding several of these seven sites says: "***The existing development (house) at this site is assumed to be removed for higher density housing development to occur.***"

Has the staff informed the homeowners and residents that the County is considering removing them from their properties?

- c. The entrances and exits from these properties are single lane roads (not larger than a driveway and can only accommodate a single car in one direction) directly onto HW68. **In case of an emergency, how are approximately 750 cars going to exit using a single lane driveway onto Highway 68?**

Regarding all 12 sites in the “South of Airport” area (sites 1-4 and 61-68):

All sites fail on AB 1397 “realistic sites”. The State requires that all sites proposed be “realistic sites” and these sites all fail for the following reasons:

- **Environmentally sensitive area:** The Big Sur Land Trust (BSLT) has recently purchased a 50-acre parcel of land that is contiguous to these parcels and, together, form a wildlife corridor and essential fire break. The features of the purchased land will also be true for these parcels. These features include:
 - a. Preserving the cultural importance of the land to the Ohlone/Costanoan-Esselen Nation.
 - b. The wetlands conserved on this property trap sediment, improve water quality and decrease the flood risk for the downstream communities along the Canyon Del Rey watershed. These ecosystem benefits will help reduce climate change impacts related to increased storm flows of water and sediment.
 - c. The wetlands also help to sequester carbon, and the property’s location in a wildlife corridor will allow species to move across landscapes to find food, water and shelter.
 - d. Proper management of this land will reduce wildfire risk for the surrounding wildland urban interface of Monterey and Del Rey Oaks.
 - e. By preventing potential development, the BSLT is protecting important habitats that are part of a valuable wildlife corridor. Deer, coyote, mountain lions and black bears have been spotted on the land.

- f. This preservation supports the State's 30×30 goals of protecting 30% of California lands and waters by 2030,
- **Water:** Recently, a developer investigated the availability of water on parcels 2-4 by drilling, for the purpose of building a development using the Affordable Housing Overlay. The study concluded that there was insufficient water to proceed without additional water permits (page 3-42 in the proposal). However, no additional water permits are available in the county. **How does the County propose to build approximately 10,000 housing units without water, and specifically, over 1800 units on the South of Airport sites?** As stated in the proposal, water treatment is expensive. ***A more realistic approach would be to focus on locations where water is already available.*** This can be achieved by focusing on redevelopment of existing buildings and converting them into affordable housing units (as has been done in Salinas at the Rabobank project).
 - **Traffic:** Traffic on HW 68 is already congested. Bringing affordable housing closer to jobs is certainly the correct approach but doing so by gridlocking HW 68 is not reasonable. The additional units proposed for the “South of Airport” area (1835 total units) would add over 3500 cars to the intersection of HW 68 with Olmsted Road and Josselyn Canyon Road. Gridlocking HW 68 at Olmsted Road would severely impact ingress and egress to and from Monterey Regional Airport, an economic lifeline to the County. Furthermore, in case of an emergency, it would be unfeasible to exit these properties.
 - **Air quality:** The congested traffic will cause significant deterioration in local air quality, both to onsite residents of the new development and to nearby existing populations. The specific pollutants of public health concern are sulfur dioxide, oxides of nitrogen, carbon monoxide and carbon fiber from tires. Approximately 20,000 deaths per annum occur in the United States from these air pollutants. The additional pollutants will certainly decrease the health of this community.

- **Fire hazard:** This area is in a “high fire danger zone” and is adjacent to an “extremely high fire danger zone.” At present, it is virtually impossible to obtain fire insurance for most houses in the area. Homeowners and residents in this area will have to bear the burden of self-insuring but affordable housing is for low-income households who cannot afford to self-insure. Additionally, one of the important functions of the existing greenbelt zoning gives the entire community an important firebreak. CALFIRE depends on this parcel for fire protection of this whole region. These parcels are effectively the last line of defense to repel a wildfire from entering the City of Monterey. These parcels were used extensively by CALFIRE for staging during the last major wildfire.
- **Airport noise:** The takeoff noise of individual flights over the subject parcel needing rezoning could reach 85 decibels or higher. Not only is this level high enough to cause progressive hearing loss to the 3000+ residents of the subject parcels, but that sound level would make a simple child pedestrian crossing of Olmstead a life-threatening event for both children and seniors, who may cross Olmstead frequently but cannot hear oncoming cars due to the noise from plane engines.
- **Vanishing Greenbelt.** The removal of this greenbelt is a significant adverse impact aesthetically and visually as well as a loss of habitat for many keystone animal species that can be observed on the subject parcel. Frequent observations occur of Apex/keystone species such as Mountain Lion, Bobcat and Coyote as well as many avian species of special interest, such as red shouldered hawks and peregrine falcons.
- **Safety (flight crash risk):** Within the past 3 years, a plane from Monterey Airport crashed into a single-family residence located approximately 1 mile south of airport. Fortunately, no one was home at the time and the casualties were limited to the pilot and her passenger. This will not be the case with such a high-density development which is far closer to the airport. In the event of a similar accident hitting the proposed development, the casualties would number in the hundreds if not thousands.

- Carcinogenic Aquifer Plume emanating from Fort Ord.** It is well established that there are several carcinogenic and toxic chemicals in the groundwater emanating from Fort Ord. It is also known that this subsurface water plume is presently moving in the direction of the proposed rezoning parcel, if not already present beneath the subject parcel. This is a serious threat to residents of the subject parcels, particularly to children who will predictably explore the soil of their neighborhood.

Errors in proposal for all the South of Airport sites:

The parcels are all graded on an Amenity Point System which is based upon distances to needed amenities, such as grocery stores, jobs and doctors’ offices. The stated distances in the proposal from these sites to these amenities are incorrect and hence, also the subsequent Amenity Grade. For these 12 sites, the description identifies a doctor’s office that does not exist and distances to amenities that are incorrect. The table below illustrates the errors, where the Distance in the Proposal is compared to the Actual Distance:

Entity	Distance in Proposal (miles)	Actual Distance (miles)
Safeway	1	3
Doctors on Duty (Monterey)	1	5
Doctors on Duty (Del Rey)	1	DOES NOT EXIST
Seaside Family Health Clinic	0.5	3
Foothill School	0.5	Not Available

The Foothill Elementary School is not an open school. The City of Monterey closed the site several years ago. It is currently leased to a chartered school and is therefore unavailable for public use. **The County cannot use this in the amenity point system.**

Errors such as the above make the reader question the validity of the entire document. What other errors or omissions are in this document which was ‘hurried through’ and is now being ‘rushed through for approval’ because it is six-months late by the Staff and the consultants?

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with funding and focusing on redeployment of existing sites with existing water permits.

Finally, the Supervisors CANNOT accept an analysis and proposal that is riddled with errors. Commissioner Diehl said it succinctly when she summarized that “***if you want something badly, that’s what you’re going to get. This is too important to get it wrong.***”

From: [Dana Heinrich](#)
To: [293-pchearingcomments](#)
Subject: Comments for the June 4 Supervisor Meeting re the RHNA proposal
Date: Thursday, May 30, 2024 6:39:59 AM
Attachments: [Letter to the Supervisors for June 4 2024 meeting .docx](#)

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Sincerely,
Dana Heinrich
Sent from my iPad

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The Inclusionary Housing Ordinance (IHO) is used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units would be built. This formula forces the County to approve the development of housing units **that are not needed and only amplify sprawl and negatively impact the environment.** As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades.

The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. I estimate that the County needs approximately \$35M per year to support the development of these units (1100 units x \$250K/unit divided by 8 years; note that moderate units do not need additional funding). This is not an insurmountable amount. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and an monstrous environmental impact.

Errors in the recommended sites

The published guidelines for the RHNA proposal include instructions to:

- 1) Protect desirable land uses
- 2) Prevent soil erosion and enhance water quality
- 3) Minimize risks from fire

This proposal fails on all three counts.

Furthermore, the proposal fails miserably on infrastructure requirements.

The Housing Element Sites Inventory Guidebook specifically states that the County is to:

Provide in the analysis a general description of any known environment or other features (floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites.....The analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities.

and

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program plan

The Staff's proposal fails on both requirements. Sites with floodplains, protected wetlands, oak tree preserves, and very high fire hazard are included in the proposal. Furthermore, sites without water resources, sewers etc., are also included. These sites need to be removed from the proposal.

Objections to sites 1-4 and 61-68 in the "South of Airport" vicinity

Taken together these sites have a capacity of 1835 units in the RHNA proposal. This is approximately 20% of the entire County's proposal. If this were to be completed, a fair estimate for the population of the proposed South of Airport housing would be approximately 3700 people, all located within 110 acres (according to the proposal), which is 0.17 square miles. This is a population density of over 19,000 people/sq mile. In comparison, the population density of the City of Monterey is only 3,285 people/sq mile. In fact, the proposed South of Airport housing would have a higher population density than the city of San Francisco (18,633 people/sq mile).

The negative impact on the environment cannot be overstated.

There are numerous problems with the proposal for these sites. Specifically, regarding Sites 61-68:

- a. These sites will account for 417 housing units.
- b. The proposal is to remove existing houses to build affordable housing. The text regarding several of these seven sites says: "***The existing development (house) at this site is assumed to be removed for higher density housing development to occur.***"

Has the staff informed the homeowners and residents that the County is considering removing them from their properties?

- c. The entrances and exits from these properties are single lane roads (not larger than a driveway and can only accommodate a single car in one direction) directly onto HW68. **In case of an emergency, how are approximately 750 cars going to exit using a single lane driveway onto Highway 68?**

Regarding all 12 sites in the “South of Airport” area (sites 1-4 and 61-68):

All sites fail on AB 1397 “realistic sites”. The State requires that all sites proposed be “realistic sites” and these sites all fail for the following reasons:

- **Environmentally sensitive area:** The Big Sur Land Trust (BSLT) has recently purchased a 50-acre parcel of land that is contiguous to these parcels and, together, form a wildlife corridor and essential fire break. The features of the purchased land will also be true for these parcels. These features include:
 - a. Preserving the cultural importance of the land to the Ohlone/Costanoan-Esselen Nation.
 - b. The wetlands conserved on this property trap sediment, improve water quality and decrease the flood risk for the downstream communities along the Canyon Del Rey watershed. These ecosystem benefits will help reduce climate change impacts related to increased storm flows of water and sediment.
 - c. The wetlands also help to sequester carbon, and the property’s location in a wildlife corridor will allow species to move across landscapes to find food, water and shelter.
 - d. Proper management of this land will reduce wildfire risk for the surrounding wildland urban interface of Monterey and Del Rey Oaks.
 - e. By preventing potential development, the BSLT is protecting important habitats that are part of a valuable wildlife corridor. Deer, coyote, mountain lions and black bears have been spotted on the land.

- f. This preservation supports the State's 30×30 goals of protecting 30% of California lands and waters by 2030,
- **Water:** Recently, a developer investigated the availability of water on parcels 2-4 by drilling, for the purpose of building a development using the Affordable Housing Overlay. The study concluded that there was insufficient water to proceed without additional water permits (page 3-42 in the proposal). However, no additional water permits are available in the county. **How does the County propose to build approximately 10,000 housing units without water, and specifically, over 1800 units on the South of Airport sites?** As stated in the proposal, water treatment is expensive. ***A more realistic approach would be to focus on locations where water is already available.*** This can be achieved by focusing on redevelopment of existing buildings and converting them into affordable housing units (as has been done in Salinas at the Rabobank project).
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The Foothill Elementary School is not an open school. The City of Monterey closed the site several years ago. It is currently leased to a chartered school and is therefore unavailable for public use. **The County cannot use this in the amenity point system.**

Errors such as the above make the reader question the validity of the entire document. What other errors or omissions are in this document which was ‘hurried through’ and is now being ‘rushed through for approval’ because it is six-months late by the Staff and the consultants?

Summary

The Staff and the Supervisors have not provided its constituents with a transparent process, nor have they actively included the county’s major stakeholders, that is, the tax-paying residents. When reached by members of the public, the staff reported that the proposal could not be amended. When asked for meetings, the staff were typically too busy and responded to our questions in months rather than days.

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The County **MUST** find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle and upper income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1100 affordable housing units is not unreachable. This can be supported by beginning to think “outside the box”

with funding and focusing on redeployment of existing sites with existing water permits.

Finally, the Supervisors CANNOT accept an analysis and proposal that is riddled with errors. Commissioner Diehl said it succinctly when she summarized that “***if you want something badly, that’s what you’re going to get. This is too important to get it wrong.***”

From: [Susan Hunt](#)
To: [293-pchearingcomments](#)
Subject: Comments regards the Housing Element proposal
Date: Friday, May 31, 2024 9:50:24 AM

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

The Staff's RHNA proposal must be amended.

The Potential Long-Term Effects of the Proposal

The staff analyzed that the County needed 3326 new housing units in the next 8 years. Commissioner Daniels rightly asked, "how many units are currently in the pipeline?" which would reduce this number. After subtracting the "pipeline" units, the ACTUAL need in the County is 1269 units. Adding the state-required 15% buffer should raise the proposal to 1460 units. But the staff is proposing that we build over 10,000 housing units!

While we can always build more units than proposed, it is imperative to propose the minimum number that the State mandates. The reason for this is very simple: once the plan is accepted, the State will require the County to rezone all the sites identified in the proposal into high density residential zones with up to 20 housing units per acre. Even more concerning is that this rezoning may be permanent! Director Spenser confirmed this at the May 15, 2024 meeting and further stated that "*it is difficult to reverse zoning decisions.*" While we may think that the Planning Commission can control the number of units built through the permitting process, the State is already planning to move local control of RHNA identified sites to the State's HCD. Telling the State that we need 10,000 homes will virtually guarantee that permits for more housing than we need will eventually be approved.

The only possible reason for advocating for 10,000 units is to subsidize the cost of building low-income housing units. Building 10,000 units is essentially building ten East Garrison communities. Can the Monterey Peninsula support that many new homes? Do we have the infrastructure for it? Can the environment survive it? The answer to all these questions is "no".

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1269 units (see table below which is

derived from the proposal) and only 1096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower- and middle-income categories is 1260. But the County is proposing to develop over 10,000 housing units.

Housing type	Identified Need	Units In Process	Actual Need
Extremely low	1070	184	886
Low	700	490	210
Moderate	420	247	173
Above Market	1136	1345	-209

The Inclusionary Housing Ordinance (IHO) was used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units would be built. This formula forces the County to approve the development of (and permanently rezone the parcels for) housing units that are not needed and only amplify sprawl and negatively impact the environment. As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades.

The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and a monstrous environmental impact.

Possible Funding for Affordable Housing

Commissioners Daniels and Diehl point out that, for the past several decades, the County has been using the Inclusionary Housing Ordinance (IHO) as a method to fund the building of Affordable Housing. Both commissioners pointed out that this program has been an abject failure. It has failed to build the affordable housing that we need. There must be a better way to achieve the construction of 1100 affordable housing units (for the low and extremely low income categories) without destroying the community that we love. At the May 15 meeting, Commissioner Diehl said: we *“cannot support going forward with the IHO as it exists now as a basis for identifying the number of sites as we see here.”*

In March, I asked Director of Housing, Mr. Craig Spenser, “how much financial support would a developer need to build affordable housing and still make a profit?” His answer was “around \$250,000 for each unit” If one assumes that this is roughly correct, it is simple arithmetic to estimate that we need roughly \$35M per year in financial assistance to developers to achieve our housing needs. Our County has a population of roughly 500,000 people. Distributed over the population, this is \$75 per person per year or \$6 per person per month. Obviously, there are other funding methods and algorithms that may be more equitable. In a County as large as ours, this can be done. This is not insurmountable, and we simply need the will to make it happen.

Objections for the lack of transparency by the Staff’s work

At the May 15, 2024 special meeting of the Planning Commission, Commission Diehl suggested that the perceived lack of transparency was due to the volume of information in the proposal. THIS IS NOT THE CASE. The lack of transparency is directly related to the staff’s omission of actively including the tax paying public, and particularly those residents who will be directly impacted by this proposal.

Our communities were not informed that there was any discussion regarding the RHNA work, the County’s site selection process, the County’s proposal nor how it would affect our communities. In fact, when we accidentally learned of the activity and then reached out to the staff (in early December 2023), we were told “it is too late to provide input or for the County to change its proposal.” The staff told us that notices were posted on the County’s website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn’t enough time for the staff to hear our concerns.

I reached out to my Supervisor in February for a meeting which she arranged with the Staff four weeks later (in March). We provided the staff with a list of questions, and *it took 6 weeks (May) for Director Spenser to reply.*

The County Staff informed me that there were nine “pop-up” events but none in our community and the times and locations of these “pop-up” events were not advertised to us even though nearly 20% of the units in the proposal are within this community.

The County Staff had multiple meetings with “stake holders” which are curiously absent of property tax-paying homeowners and residents of the affected areas, but developers were included. Per the proposal, the stake holders included:

- i. Carmel Valley Association
 - ii. Tribal Communities
 - iii. Fair Housing Providers
 - iv. Housing Advocacy and Community
- Organizations
- v. Affordable Housing Managers
 - vi. Ag-based business advocacy groups
 - vii. Hospitality community
 - viii. Market housing developers
 - ix. Affordable housing developers

There are multiple sites (61-69 along HW 68 near Olmsted Road) in the proposal that identify a parcel of land with an existing residence. In the proposal, the staff assumes that the existing houses on several of these sites will be “removed”. I understand that there are other sites in Carmel Valley that have similar designations. To my knowledge, none of these site owners have been informed of the Staff’s recommendations. Several people showed up at the Planning Commission meeting on May 15 and informed the Planning Commission that they had just learned of these proposals and their impact on their properties within the previous 72 hours. This wasn’t a matter that the proposal was difficult to read; this is simply that the community wasn’t made aware of the activities of the Staff or their implications.

The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population (one person per 1000!). How can the County base policy and procedures with such a low turnout?

This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community, and particularly the tax-paying property owners of the county.

Errors in the recommended sites

The published guidelines for the RHNA proposal include instructions to:

- 1) Protect desirable land uses
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This proposal fails on all three counts.

Furthermore, the proposal fails miserably on infrastructure requirements.

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<https://www.facebook.com/100064912142998/posts/pfbid02iGA5UzZpuoAmstjiLESdDoMmStMdD3E9S1wmgESr3dUWNMEuVBRAPPjHhPuH1BzJI/?mibextid=cr9u03>

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(Monterey)		
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McDougal, Melissa

From: james@russospro.com
Sent: Wednesday, May 29, 2024 6:03 AM
To: 293-pchearingcomments; 100-District 1 (831) 647-7991; 100-District 2 (831) 755-5022; 100-District 3 (831) 385-8333; 100-District 4 (831) 883-7570; 100-District 5 (831) 647-7755
Subject: Subject: Comments for the Jan 4 Supervisor Meeting regarding the RHNA proposal
Attachments: 20240529062550720.pdf

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Thank you
James Russo

7117 Oak Tree place
Monterey, Ca. 93940

The Staff's Affordable Housing (RHNA) Proposal must be rejected.

On May 6, 2024, the County published their 985-page Regional Housing Needs Assessment (RHNA) in response to the State's mandate. The work for this proposal started nearly two years ago, was known to be coming for several years, and the County spent nearly \$2M on consultants to prepare this proposal. With all that, they are still 6 months late.

On May 15, 2024, the County's Planning Commission reviewed a presentation by the staff on their work. The proposal was resoundingly rejected by the commission and virtually everyone in attendance (except by one developer).

The Potential Long-Term Effects of the Proposal

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that many new homes? Do we have the infrastructure for it? Can the environment survive it? The answer to all these questions is “no”.

Funding for Affordable Housing

Commissioners Daniels and Diehl point out that, for the past several decades, the County has been using the Inclusionary Housing Ordinance (IHO) as a method to fund the building of Affordable Housing. The IHO requires developers to build one “affordable” house for every four “market” houses that they build. Both commissioners pointed out that this program has been an abject failure. It has failed to build the affordable housing that we need. There must be a better way to achieve the construction of 1200 affordable housing units without destroying the community that we love. At the May 15 meeting, Commissioner Diehl said: we *“cannot support going forward with the IHO as it exists now as a basis for identifying the number of sites as we see here.”*

In March, I asked Director of Housing, Mr. Craig Spenser, “how much financial support would a developer need to build affordable housing and still make a profit?” His answer was “around \$250,000 for each unit” If one assumes that this is roughly correct, it is simple arithmetic to estimate that we need roughly \$35M per year in financial assistance to achieve our housing needs. Our County has a population of roughly 500,000 people. Distributed over the population, this is \$75 per person per year or \$6 per person per month. Obviously, there are other funding methods and algorithms that may be more equitable. In a County as large as ours, this can be done.

Objections for the lack of transparency

Our communities were not informed that there was any discussion regarding the County’s site selection process, the County’s proposal and how it would affect our communities. In fact, when we accidentally learned of the activity and then reached out to the staff (in early December 2023), we were told “it is too late to provide input or for the County to change its proposal.” The staff

told us that notices were posted on the County's website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn't enough time to hear our concerns.

I reached out to my Supervisor in February for a meeting which she arranged with the Staff four weeks later (in March). We provided the Staff with a list of questions, and it took the Staff 6 weeks after the meeting for them to reply.

The County Staff informed me that there were nine "pop-up" events but none in our community and the times and locations of these "pop-up" events were not advertised to us.

According to the proposal, the County Staff had multiple meetings with "stake holders" which are curiously absent of property tax-paying homeowners and residents of the affected areas, but developers were included. Per the proposal, the stake holders included:

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There are multiple sites (61-69 along HW 68 near Olmsted Road) in the proposal that identify a parcel of land with an existing residence. In the proposal, the staff assumes that the existing houses on several of these sites will be "removed". I understand that there are other sites in Carmel Valley that have similar designations. To my knowledge, none of these site owners have been informed of the Staff's recommendations. Several people showed up at the Planning Commission meeting on May 15 and informed the Planning

Commission that they had just learned of these proposals and their impact to their properties within the previous 72 hours.

The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population. How can one base policy and procedures with such a low turnout?

This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community and in particular, the tax-paying property owners of the county.

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1269 units (see table below which is derived from the proposal) and only 1096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower income categories is 1460. But the County is proposing to develop over 10,000 housing units.

Housing type	Identified Need	Units In Process	Actual Need
Extremely low	1070	184	886
Low	700	490	210
Moderate	420	247	173
Above Market	1136	1345	-209

The Inclusionary Housing Ordinance (IHO) is used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units would be built. This formula forces the County to approve the development of housing units **that are not needed and only amplify sprawl and negatively impact the environment.** As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades.

The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. I estimate that the County needs approximately \$35M per year to support the development of these units (1100 units x \$250K/unit divided by 8 years; note that moderate units do not need additional funding). This is not an insurmountable amount. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and an monstrous environmental impact.

Errors in the recommended sites

The published guidelines for the RHNA proposal include instructions to:

- 1) Protect desirable land uses
- 2) Prevent soil erosion and enhance water quality
- 3) Minimize risks from fire

This proposal fails on all three counts.

Furthermore, the proposal fails miserably on infrastructure requirements.

The Housing Element Sites Inventory Guidebook specifically states that the County is to:

Provide in the analysis a general description of any known environment or other features (floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites.....The analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities.

and

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program plan

The Staff's proposal fails on both requirements. Sites with floodplains, protected wetlands, oak tree preserves, and very high fire hazard are included in the proposal. Furthermore, sites without water resources, sewers etc., are also included. These sites need to be removed from the proposal.

Objections to sites 1-4 and 61-68 in the "South of Airport" vicinity

Taken together these sites have a capacity of 1835 units in the RHNA proposal. This is approximately 20% of the entire County's proposal. If this were to be completed, a fair estimate for the population of the proposed South of Airport housing would be approximately 3700 people, all located within 110 acres (according to the proposal), which is 0.17 square miles. This is a population density of over 19,000 people/sq mile. In comparison, the population density of the City of Monterey is only 3,285 people/sq mile. In fact, the proposed South of Airport housing would have a higher population density than the city of San Francisco (18,633 people/sq mile).

The negative impact on the environment cannot be overstated.

There are numerous problems with the proposal for these sites. Specifically, regarding Sites 61-68:

- a. These sites will account for 417 housing units.
- b. The proposal is to remove existing houses to build affordable housing. The text regarding several of these seven sites says: "***The existing development (house) at this site is assumed to be removed for higher density housing development to occur.***"

Has the staff informed the homeowners and residents that the County is considering removing them from their properties?

- c. The entrances and exits from these properties are single lane roads (not larger than a driveway and can only accommodate a single car in one direction) directly onto HW68. **In case of an emergency, how are approximately 750 cars going to exit using a single lane driveway onto Highway 68?**

Regarding all 12 sites in the “South of Airport” area (sites 1-4 and 61-68):

All sites fail on AB 1397 “realistic sites”. The State requires that all sites proposed be “realistic sites” and these sites all fail for the following reasons:

- **Environmentally sensitive area:** The Big Sur Land Trust (BSLT) has recently purchased a 50-acre parcel of land that is contiguous to these parcels and, together, form a wildlife corridor and essential fire break. The features of the purchased land will also be true for these parcels. These features include:
 - a. Preserving the cultural importance of the land to the Ohlone/Costanoan-Esselen Nation.
 - b. The wetlands conserved on this property trap sediment, improve water quality and decrease the flood risk for the downstream communities along the Canyon Del Rey watershed. These ecosystem benefits will help reduce climate change impacts related to increased storm flows of water and sediment.
 - c. The wetlands also help to sequester carbon, and the property’s location in a wildlife corridor will allow species to move across landscapes to find food, water and shelter.
 - d. Proper management of this land will reduce wildfire risk for the surrounding wildland urban interface of Monterey and Del Rey Oaks.
 - e. By preventing potential development, the BSLT is protecting important habitats that are part of a valuable wildlife corridor. Deer, coyote, mountain lions and black bears have been spotted on the land.

- f. This preservation supports the State's 30×30 goals of protecting 30% of California lands and waters by 2030,
- **Water:** Recently, a developer investigated the availability of water on parcels 2-4 by drilling, for the purpose of building a development using the Affordable Housing Overlay. The study concluded that there was insufficient water to proceed without additional water permits (page 3-42 in the proposal). However, no additional water permits are available in the county. **How does the County propose to build approximately 10,000 housing units without water, and specifically, over 1800 units on the South of Airport sites?** As stated in the proposal, water treatment is expensive. **A more realistic approach would be to focus on locations where water is already available.** This can be achieved by focusing on redevelopment of existing buildings and converting them into affordable housing units (as has been done in Salinas at the Rabobank project).
 - **Traffic:** Traffic on HW 68 is already congested. Bringing affordable housing closer to jobs is certainly the correct approach but doing so by gridlocking HW 68 is not reasonable. The additional units proposed for the "South of Airport" area (1835 total units) would add over 3500 cars to the intersection of HW 68 with Olmsted Road and Josselyn Canyon Road. Gridlocking HW 68 at Olmsted Road would severely impact ingress and egress to and from Monterey Regional Airport, an economic lifeline to the County. Furthermore, in case of an emergency, it would be unfeasible to exit these properties.
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- **Fire hazard:** This area is in a “high fire danger zone” and is adjacent to an “extremely high fire danger zone.” At present, it is virtually impossible to obtain fire insurance for most houses in the area. Homeowners and residents in this area will have to bear the burden of self-insuring but affordable housing is for low-income households who cannot afford to self-insure. Additionally, one of the important functions of the existing greenbelt zoning gives the entire community an important firebreak. CALFIRE depends on this parcel for fire protection of this whole region. These parcels are effectively the last line of defense to repel a wildfire from entering the City of Monterey. These parcels were used extensively by CALFIRE for staging during the last major wildfire.
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- **Safety (flight crash risk):** Within the past 3 years, a plane from Monterey Airport crashed into a single-family residence located approximately 1 mile south of airport. Fortunately, no one was home at the time and the casualties were limited to the pilot and her passenger. This will not be the case with such a high-density development which is far closer to the airport. In the event of a similar accident hitting the proposed development, the casualties would number in the hundreds if not thousands.

- Carcinogenic Aquifer Plume emanating from Fort Ord.** It is well established that there are several carcinogenic and toxic chemicals in the groundwater emanating from Fort Ord. It is also known that this subsurface water plume is presently moving in the direction of the proposed rezoning parcel, if not already present beneath the subject parcel. This is a serious threat to residents of the subject parcels, particularly to children who will predictably explore the soil of their neighborhood.

Errors in proposal for all the South of Airport sites:

The parcels are all graded on an Amenity Point System which is based upon distances to needed amenities, such as grocery stores, jobs and doctors' offices. The stated distances in the proposal from these sites to these amenities are incorrect and hence, also the subsequent Amenity Grade. For these 12 sites, the description identifies a doctor's office that does not exist and distances to amenities that are incorrect. The table below illustrates the errors, where the Distance in the Proposal is compared to the Actual Distance:

Entity	Distance in Proposal (miles)	Actual Distance (miles)
Safeway	1	3
Doctors on Duty (Monterey)	1	5
Doctors on Duty (Del Rey)	1	DOES NOT EXIST
Seaside Family Health Clinic	0.5	3
Foothill School	0.5	Not Available

The Foothill Elementary School is not an open school. The City of Monterey closed the site several years ago. It is currently leased to a chartered school and is therefore unavailable for public use. **The County cannot use this in the amenity point system.**

Errors such as the above make the reader question the validity of the entire document. What other errors or omissions are in this document which was ‘hurried through’ and is now being ‘rushed through for approval’ because it is six-months late by the Staff and the consultants?

Summary

The Staff and the Supervisors have not provided its constituents with a transparent process, nor have they actively included the county’s major stakeholders, that is, the tax-paying residents. When reached by members of the public, the staff reported that the proposal could not be amended. When asked for meetings, the staff were typically too busy and responded to our questions in months rather than days.

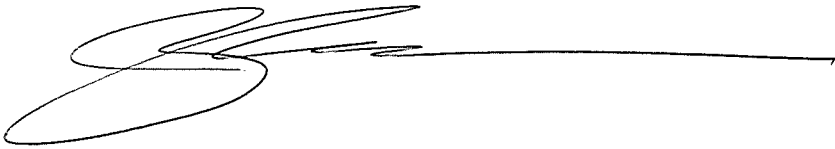
The Staff spent nearly \$2M on consultants from Irvine, CA, and this proposal appears to be nothing more than an internet search using “Google Maps” and “Siri”. The sloppiness of this report cannot be overstated. The viability of the sites was not confirmed. In many cases, the slopes of these sites are over 25 degrees, which makes them virtually impossible to build upon. Sites inside “extremely high fire danger zones” should have been removed. Sites with archeological significance, or wetlands, should have been removed. The number of errors in this report is appalling. This makes one question how the County is spending the tax-payer money.

The County **MUST** find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle and upper income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1100 affordable housing units is not unreachable. This can be supported by beginning to think “outside the box”

with funding and focusing on redeployment of existing sites with existing water permits.

Finally, the Supervisors CANNOT accept an analysis and proposal that is riddled with errors. Commissioner Diehl said it succinctly when she summarized that ***“if you want something badly, that’s what you’re going to get. This is too important to get it wrong.”***

Thank you

A handwritten signature in black ink, appearing to read 'James Russo', with a long horizontal line extending to the right.

James Russo

7117 Oak Tree Place

Monterey, Ca. 93940

From: [Stuart Jacobs](#)
To: [293-pcheamqcomments](#)
Subject: Olmsted proposal
Date: Friday, May 31, 2024 8:26:14 AM

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

The Staff's RHNA proposal must be amended.

The Potential Long-Term Effects of the Proposal

The staff analyzed that the County needed 3326 new housing units in the next 8 years. Commissioner Daniels rightly asked, "how many units are currently in the pipeline?" which would reduce this number. After subtracting the "pipeline" units, the ACTUAL need in the County is 1269 units. Adding the state-required 15% buffer should raise the proposal to 1460 units. But the staff is proposing that we build over 10,000 housing units!

While we can always build more units than proposed, it is imperative to propose the minimum number that the State mandates. The reason for this is very simple: once the plan is accepted, the State will require the County to rezone all the sites identified in the proposal into high density residential zones with up to 20 housing units per acre. Even more concerning is that this rezoning may be permanent! Director Spenser confirmed this at the May 15, 2024 meeting and further stated that "*it is difficult to reverse zoning decisions.*" While we may think that the Planning Commission can control the number of units built through the permitting process, the State is already planning to move local control of RHNA identified sites to the State's HCD. Telling the State that we need 10,000 homes will virtually guarantee that permits for more housing than we need will eventually be approved.

The only possible reason for advocating for 10,000 units is to subsidize the cost of building low-income housing units. Building 10,000 units is essentially building ten East Garrison communities. Can the Monterey Peninsula support that many new homes? Do we have the infrastructure for it? Can the environment survive it? The answer to all these questions is "no".

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1269 units (see table below which is derived from the proposal) and only 1096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower- and middle-income categories is 1260. But the County is proposing to develop over 10,000 housing units.

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The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and a monstrous environmental impact.

Possible Funding for Affordable Housing

Commissioners Daniels and Diehl point out that, for the past several decades, the County has been using the Inclusionary Housing Ordinance (IHO) as a method to fund the building of Affordable Housing. Both commissioners pointed out that this program has been an abject failure. It has failed to build the affordable housing that we need. There must be a better way to achieve the construction of 1100 affordable housing units (for the low and extremely low income categories) without destroying the community that we love. At the May 15 meeting, Commissioner Diehl said: we "*cannot support going forward with the IHO as it exists now as a basis for identifying the number of sites as we see here.*"

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Objections for the lack of transparency by the Staff's work

At the May 15, 2024 special meeting of the Planning Commission, Commission Diehl suggested that the perceived lack of transparency was due to the volume of information in the proposal. THIS IS NOT THE CASE. The lack of transparency is directly related to the staff's omission of actively including the tax paying public, and particularly those residents who will be directly impacted by this proposal.

Our communities were not informed that there was any discussion regarding the RHNA work, the County's site selection process, the County's proposal nor how it would affect our communities. In fact, when we accidentally learned of the activity and then reached out to the staff (in early December 2023), we were told "it is too late to provide input or for the County to change its proposal." The staff told us that notices were posted on the County's website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn't enough time for the staff to hear our concerns.

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See: <https://www.facebook.com/100064912142998/posts/pfbid02iGASUzZpuoAmstjiLESdDoMmStMdD3E9S1wmgESr3dUWNMEuVBRAPPjHhPuH1BzJl/?mibextid=cr9u03>
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The Foothill Elementary School is not an open school. DOES NOT EXIST. They closed the site several years ago. It is currently leased to a chartered school and is therefore unavailable for public use. The County cannot use this in the amenity point system.		
Errors such as "side facade" and "the reader" question the validity of the entire document. What other errors or omissions are in this document which was "hurried through" and is now being "rushed through for approval" because it is six-months late by the Staff and the consultants?	0.5	3
Foothill School	0.5	Not Available

Summary

The Staff and the Supervisors have not provided its constituents with a transparent process, nor have they actively included the county's major stakeholders, that is, the tax-paying residents. When reached by members of the public, the staff reported that the proposal could not be amended. When asked for meetings, the staff were typically too busy and responded to our questions in months rather than days.

The Staff spent nearly \$2M on consultants from Irvine, CA, and this proposal appears to be nothing more than an internet search using "Google Maps" and "Siri". The sloppiness of this report cannot be overstated. The viability of the sites was not confirmed. In many cases, the slopes of these sites are over 25 degrees, which makes them virtually impossible to build upon. Sites inside "extremely high fire danger zones" should have been removed. Sites with archeological significance, or wetlands, should have been removed. The number of errors in this report is appalling. This makes one question how the County is spending our tax-payer money.

The County MUST find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle- and upper-income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1100 affordable housing units is not unreachable. This can be supported by beginning to think "outside the box" with funding and focusing on redeployment of existing sites with existing water permits.

Finally, Commissioner Diehl said it succinctly when she summarized that "if you want something badly, that's what you're going to get. This is too important to get it wrong."

Sent from my iPhone

McDougal, Melissa

From: info information <info@russospro.com>
Sent: Tuesday, May 28, 2024 8:15 PM
To: 293-pchearingcomments; 293-pchearingcomments; 100-District 1 (831) 647-7991; 100-District 2 (831) 755-5022; 100-District 3 (831) 385-8333; 100-District 4 (831) 883-7570; 100-District 5 (831) 647-7755
Subject: RHNA

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

The Staff's Affordable Housing (RHNA) Proposal must be rejected.

On May 6, 2024, the County published their 985-page Regional Housing Needs Assessment (RHNA) in response to the State's mandate. The work for this proposal started nearly two years ago, was known to be coming for several years, and the County spent nearly \$2M on consultants to prepare this proposal. With all that, they are still 6 months late.

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The staff analyzed that the County needed 3326 new housing units in the next 8 years. Commissioner Daniels rightly asked, "how many units are currently in the pipeline?" which would reduce this number. After subtracting the "pipeline" units, the ACTUAL need in the County is 1269 units. Adding the state-required 15% buffer should raise the proposal to 1460 units. But the staff is proposing that we build over 10,000 housing units!

While we can always build more units than proposed, it is imperative to propose the minimum number that the State mandates. The reason for this is very simple: once the plan is accepted, the State will require the County to rezone all the sites identified in the proposal into high density residential zones with up to 20 housing units per acre. Even more concerning is that this rezoning may be permanent! In fact, Director Spenser stated that "*it is difficult to reverse zoning decisions.*" While we may think that the Planning Commission can control the number of units built through the permitting process, the State is already planning to move local control of RHNA identified sites to the State's HCD.

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Commissioners Daniels and Diehl point out that, for the past several decades, the County has been using the Inclusionary Housing Ordinance (IHO) as a method to fund the building of Affordable Housing. The IHO requires developers to build one “affordable” house for every four “market” houses that they build. Both commissioners pointed out that this program has been an abject failure. It has failed to build the affordable housing that we need. There must be a better way to achieve the construction of 1200 affordable housing units without destroying the community that we love. At the May 15 meeting, Commissioner Diehl said: *we “cannot support going forward with the IHO as it exists now as a basis for identifying the number of sites as we see here.”*

In March, I asked Director of Housing, Mr. Craig Spenser, “how much financial support would a developer need to build affordable housing and still make a profit?” His answer was “around \$250,000 for each unit” If one assumes that this is roughly correct, it is simple arithmetic to estimate that we need roughly \$35M per year in financial assistance to achieve our housing needs. Our County has a population of roughly 500,000 people. Distributed over the population, this is \$75 per person per year or \$6 per person per month. Obviously, there are other funding methods and algorithms that may be more equitable. In a County as large as ours, this can be done.

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Our communities were not informed that there was any discussion regarding the County’s site selection process, the County’s proposal and how it would affect our communities. In fact, when we accidentally learned of the activity and then reached out to the staff (in early December 2023), we were told “it is too late to provide input or for the County to change its proposal.” The staff told us that notices were posted on the County’s website. This conversation occurred

nearly 6 months before the proposal was published and yet, there wasn't enough time to hear our concerns.

I reached out to my Supervisor in February for a meeting which she arranged with the Staff four weeks later (in March). We provided the Staff with a list of questions, and it took the Staff 6 weeks after the meeting for them to reply. The County Staff informed me that there were nine "pop-up" events but none in our community and the times and locations of these "pop-up" events were not advertised to us.

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There are multiple sites (61-69 along HW 68 near Olmsted Road) in the proposal that identify a parcel of land with an existing residence. In the proposal, the staff assumes that the existing houses on several of these sites will be "removed". I understand that there are other sites in Carmel Valley that have similar designations. To my knowledge, none of these site owners have been informed of the Staff's recommendations. Several people showed up at the Planning Commission meeting on May 15 and informed the Planning Commission that they had just learned of these proposals and their impact to their properties within the previous 72 hours.

The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population. How can one base policy and procedures with such a low turnout?

This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community and in particular, the tax-paying property owners of the county.

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1269 units (see table below which is derived from the proposal) and only 1096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower income categories is 1460. But the County is proposing to develop over 10,000 housing units.

Housing type	Identified Need	Units In Process	Actual Need
Extremely low	1070	184	886
Low	700	490	210
Moderate	420	247	173
Above Market	1136	1345	-209

The Inclusionary Housing Ordinance (IHO) is used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units would be built. This formula forces the County to approve the development of housing units **that are not needed and only amplify sprawl and negatively impact the environment**. As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades. The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. I estimate that the County needs approximately \$35M per year to support the development of these units (1100 units x \$250K/unit divided by 8 years; note that moderate units do not need additional funding). This is not an insurmountable amount. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and an monstrous environmental impact.

Errors in the recommended sites

The published guidelines for the RHNA proposal include instructions to:

- 1) Protect desirable land uses
- 2) Prevent soil erosion and enhance water quality
- 3) Minimize risks from fire

This proposal fails on all three counts.

Furthermore, the proposal fails miserably on infrastructure requirements.

The Housing Element Sites Inventory Guidebook specifically states that the County is to:

Provide in the analysis a general description of any known environment or other features (floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites.....The analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities.

and

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program plan

The Staff's proposal fails on both requirements. Sites with floodplains, protected wetlands, oak tree preserves, and very high fire hazard are included in the proposal. Furthermore, sites without water resources, sewers etc., are also included. These sites need to be removed from the proposal.

Objections to sites 1-4 and 61-68 in the "South of Airport" vicinity

Taken together these sites have a capacity of 1835 units in the RHNA proposal. This is approximately 20% of the entire County's proposal. If this were to be completed, a fair estimate for the population of the proposed South of Airport housing would be approximately 3700 people, all located within 110 acres (according to the proposal), which is 0.17 square miles. This is a population density of over 19,000 people/sq mile. In comparison, the population density of the City of Monterey is only 3,285 people/sq mile. In fact, the proposed South of Airport housing would have a higher population density than the city of San Francisco (18,633 people/sq mile).

The negative impact on the environment cannot be overstated.

There are numerous problems with the proposal for these sites. Specifically, regarding Sites 61-68:

- a. These sites will account for 417 housing units.

- b. The proposal is to remove existing houses to build affordable housing. The text regarding several of these seven sites says: ***“The existing development (house) at this site is assumed to be removed for higher density housing development to occur.”*** **Has the staff informed the homeowners and residents that the County is considering removing them from their properties?**
- c. The entrances and exits from these properties are single lane roads (not larger than a driveway and can only accommodate a single car in one direction) directly onto HW68. **In case of an emergency, how are approximately 750 cars going to exit using a single lane driveway onto Highway 68?**

Regarding all 12 sites in the “South of Airport” area (sites 1-4 and 61-68): All sites fail on AB 1397 “realistic sites”. The State requires that all sites proposed be “realistic sites” and these sites all fail for the following reasons:

- **Environmentally sensitive area:** The Big Sur Land Trust (BSLT) has recently purchased a 50-acre parcel of land that is contiguous to these parcels and, together, form a wildlife corridor and essential fire break. The features of the purchased land will also be true for these parcels. These features include:
 - a. Preserving the cultural importance of the land to the Ohlone/Costanoan-Esselen Nation.
 - b. The wetlands conserved on this property trap sediment, improve water quality and decrease the flood risk for the downstream communities along the Canyon Del Rey watershed. These ecosystem benefits will help reduce climate change impacts related to increased storm flows of water and sediment.
 - c. The wetlands also help to sequester carbon, and the property’s location in a wildlife corridor will allow species to move across landscapes to find food, water and shelter.
 - d. Proper management of this land will reduce wildfire risk for the surrounding wildland urban interface of Monterey and Del Rey Oaks.
 - e. By preventing potential development, the BSLT is protecting important habitats that are part of a valuable wildlife corridor. Deer, coyote, mountain lions and black bears have been spotted on the land.

f. This preservation supports the State's 30x30 goals of protecting 30% of California lands and waters by 2030,

- **Water:** Recently, a developer investigated the availability of water on parcels 2-4 by drilling, for the purpose of building a development using the Affordable Housing Overlay. The study concluded that there was insufficient water to proceed without additional water permits (page 3-42 in the proposal). However, no additional water permits are available in the county. **How does the County propose to build approximately 10,000 housing units without water, and specifically, over 1800 units on the South of Airport sites?** As stated in the proposal, water treatment is expensive. **A more realistic approach would be to focus on locations where water is already available.** This can be achieved by focusing on redevelopment of existing buildings and converting them into affordable housing units (as has been done in Salinas at the Rabobank project).
- **Traffic:** Traffic on HW 68 is already congested. Bringing affordable housing closer to jobs is certainly the correct approach but doing so by gridlocking HW 68 is not reasonable. The additional units proposed for the "South of Airport" area (1835 total units) would add over 3500 cars to the intersection of HW 68 with Olmsted Road and Josselyn Canyon Road. Gridlocking HW 68 at Olmsted Road would severely impact ingress and egress to and from Monterey Regional Airport, an economic lifeline to the County. Furthermore, in case of an emergency, it would be unfeasible to exit these properties.
- **Air quality:** The congested traffic will cause significant deterioration in local air quality, both to onsite residents of the new development and to nearby existing populations. The specific pollutants of public health concern are sulfur dioxide, oxides of nitrogen, carbon monoxide and carbon fiber from tires. Approximately 20,000 deaths per annum occur in the United States from these air pollutants. The additional pollutants will certainly decrease the health of this community.
- **Fire hazard:** This area is in a "high fire danger zone" and is adjacent to an "extremely high fire danger zone." At present, it is virtually impossible to obtain fire insurance for most houses in the area. Homeowners and residents in this area will have to bear the burden of self-insuring but affordable housing is for low-income households who cannot afford to self-insure. Additionally, one of the important functions of the existing greenbelt zoning gives the entire community an important firebreak. CALFIRE depends on this parcel for

fire protection of this whole region. These parcels are effectively the last line of defense to repel a wildfire from entering the City of Monterey. These parcels were used extensively by CALFIRE for staging during the last major wildfire.

- **Airport noise:** The takeoff noise of individual flights over the subject parcel needing rezoning could reach 85 decibels or higher. Not only is this level high enough to cause progressive hearing loss to the 3000+ residents of the subject parcels, but that sound level would make a simple child pedestrian crossing of Olmstead a life-threatening event for both children and seniors, who may cross Olmstead frequently but cannot hear oncoming cars due to the noise from plane engines.
- **Vanishing Greenbelt.** The removal of this greenbelt is a significant adverse impact aesthetically and visually as well as a loss of habitat for many keystone animal species that can be observed on the subject parcel. Frequent observations occur of Apex/keystone species such as Mountain Lion, Bobcat and Coyote as well as many avian species of special interest, such as red shouldered hawks and peregrine falcons.
- **Safety (flight crash risk):** Within the past 3 years, a plane from Monterey Airport crashed into a single-family residence located approximately 1 mile south of airport. Fortunately, no one was home at the time and the casualties were limited to the pilot and her passenger. This will not be the case with such a high-density development which is far closer to the airport. In the event of a similar accident hitting the proposed development, the casualties would number in the hundreds if not thousands.
- **Carcinogenic Aquifer Plume emanating from Fort Ord.** It is well established that there are several carcinogenic and toxic chemicals in the groundwater emanating from Fort Ord. It is also known that this subsurface water plume is presently moving in the direction of the proposed rezoning parcel, if not already present beneath the subject parcel. This is a serious threat to residents of the subject parcels, particularly to children who will predictably explore the soil of their neighborhood.

Errors in proposal for all the South of Airport sites:

The parcels are all graded on an Amenity Point System which is based upon distances to needed amenities, such as grocery stores, jobs and doctors' offices. The stated distances in the proposal from these sites to these

amenities are incorrect and hence, also the subsequent Amenity Grade. For these 12 sites, the description identifies a doctor’s office that does not exist and distances to amenities that are incorrect. The table below illustrates the errors, where the Distance in the Proposal is compared to the Actual Distance:

Entity	Distance in Proposal (miles)	Actual Distance (miles)
Safeway	1	3
Doctors on Duty (Monterey)	1	5
Doctors on Duty (Del Rey)	1	DOES NOT EXIST
Seaside Family Health Clinic	0.5	3
Foothill School	0.5	Not Available

The Foothill Elementary School is not an open school. The City of Monterey closed the site several years ago. It is currently leased to a chartered school and is therefore unavailable for public use. **The County cannot use this in the amenity point system.**

Errors such as the above make the reader question the validity of the entire document. What other errors or omissions are in this document which was ‘hurried through” and is now being “rushed through for approval” because it is six-months late by the Staff and the consultants?

Summary

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The County MUST find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle and upper income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1100 affordable housing units is not unreachable. This can be supported by beginning to think “outside the box” with funding and focusing on redeployment of existing sites with existing water permits. Finally, the Supervisors CANNOT accept an analysis and proposal that is riddled with errors. Commissioner Diehl said it succinctly when she summarized that ***“if you want something badly, that’s what you’re going to get. This is too important to get it wrong.”***

Best Regards,
Kristin Russo

From: EleceLeverone@gmail.com
To: [293-pchearingcomments](#)
Subject: A Very Serious Issue
Date: Friday, May 31, 2024 6:57:59 AM
Attachments: [Letter to the Supervisors for June 4 2024 meeting .docx](#)

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Please see attached letter, below.

Thank you,
Elece Leverone
Monterra Community
24262 Via Malpaso
Monterey, CA 93923

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Summary

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The County **MUST** find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle and upper income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1100 affordable housing units is not unreachable. This can be supported by beginning to think “outside the box”

with funding and focusing on redeployment of existing sites with existing water permits.

Finally, the Supervisors CANNOT accept an analysis and proposal that is riddled with errors. Commissioner Diehl said it succinctly when she summarized that “***if you want something badly, that’s what you’re going to get. This is too important to get it wrong.***”

From: [Lilly, Craig](#)
To: [293-pchearingcomments](#); [100-District 1 \(831\) 647-7991](#); [100-District 2 \(831\) 755-5022](#); [100-District 3 \(831\) 385-8333](#); [100-District 4 \(831\) 883-7570](#); [100-District 5 \(831\) 647-7755](#)
Subject: Comments for the Jan 4 Supervisor Meeting regarding the RHNA proposal
Date: Friday, May 31, 2024 1:18:43 PM

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The Staff's Affordable Housing (RHNA) Proposal must be rejected.

On May 6, 2024, the County published their 985-page Regional Housing Needs Assessment (RHNA) in response to the State's mandate. The work for this proposal started nearly two years ago, was known to be coming for several years, and the County spent nearly \$2M on consultants to prepare this proposal. With all that, they are still 6 months late.

On May 15, 2024, the County's Planning Commission reviewed a presentation by the staff on their work. The proposal was resoundingly rejected by the commission and virtually everyone in attendance (except by one developer).

The Potential Long-Term Effects of the Proposal

The staff analyzed that the County needed 3326 new housing units in the next 8 years. Commissioner Daniels rightly asked, "how many units are currently in the pipeline?" which would reduce this number. After subtracting the "pipeline" units, the ACTUAL need in the County is 1269 units. Adding the state-required 15% buffer should raise the proposal to 1460 units. But the staff is proposing that we build over 10,000 housing units!

While we can always build more units than proposed, it is imperative to propose the minimum number that the State mandates. The reason for this is very simple: once the plan is accepted, the State will require the County to rezone all the sites identified in the proposal into high density residential zones with up to 20 housing units per acre. Even more concerning is that this rezoning may be permanent! In fact, Director Spenser stated that "*it is difficult to reverse zoning decisions.*" While we may think that the Planning Commission can control the number of units built through the permitting process, the State is already planning to

move local control of RHNA identified sites to the State's HCD. Telling the State that we need 10,000 homes will virtually guarantee that permits for more housing than we need will eventually be approved. The only possible reason for advocating for 10,000 units is to subsidize the cost of building low-income housing units. Building 10,000 units is essentially building ten East Garrison communities. Can the Monterey Peninsula support that many new homes? Do we have the infrastructure for it? Can the environment survive it? The answer to all these questions is "no".

Funding for Affordable Housing

Commissioners Daniels and Diehl point out that, for the past several decades, the County has been using the Inclusionary Housing Ordinance (IHO) as a method to fund the building of Affordable Housing. The IHO requires developers to build one "affordable" house for every four "market" houses that they build. Both commissioners pointed out that this program has been an abject failure. It has failed to build the affordable housing that we need. There must be a better way to achieve the construction of 1200 affordable housing units without destroying the community that we love. At the May 15 meeting, Commissioner Diehl said: *we "cannot support going forward with the IHO as it exists now as a basis for identifying the number of sites as we see here."*

In March, I asked Director of Housing, Mr. Craig Spenser, "how much financial support would a developer need to build affordable housing and still make a profit?" His answer was "around \$250,000 for each unit" If one assumes that this is roughly correct, it is simple arithmetic to estimate that we need roughly \$35M per year in financial assistance to achieve our housing needs. Our County has a population of roughly 500,000 people. Distributed over the population, this is \$75 per person per year or \$6 per person per month. Obviously, there are other funding methods and algorithms that may be more equitable. In a County as large as ours, this can be done.

Objections for the lack of transparency

Our communities were not informed that there was any discussion regarding the County's site selection process, the County's proposal and how it would affect our communities. In fact, when we accidentally

learned of the activity and then reached out to the staff (in early December 2023), we were told “it is too late to provide input or for the County to change its proposal.” The staff told us that notices were posted on the County’s website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn’t enough time to hear our concerns.

I reached out to my Supervisor in February for a meeting which she arranged with the Staff four weeks later (in March). We provided the Staff with a list of questions, and it took the Staff 6 weeks after the meeting for them to reply.

The County Staff informed me that there were nine “pop-up” events but none in our community and the times and locations of these “pop-up” events were not advertised to us.

According to the proposal, the County Staff had multiple meetings with “stake holders” which are curiously absent of property tax-paying homeowners and residents of the affected areas, but developers were included. Per the proposal, the stake holders included:

- i. Carmel Valley Association
- ii. Tribal Communities
- iii. Fair Housing Providers
- iv. Housing Advocacy and Community Organizations
- v. Affordable Housing Managers
- vi. Ag-based business advocacy groups
- vii. Hospitality community
- viii. Market housing developers
- ix. Affordable housing developers

There are multiple sites (61-69 along HW 68 near Olmsted Road) in the proposal that identify a parcel of land with an existing residence. In the proposal, the staff assumes that the existing houses on several of these sites will be “removed”. I understand that there are other sites in Carmel Valley that have similar designations. To my knowledge, none of these site owners have been informed of the Staff’s recommendations.

Several people showed up at the Planning Commission meeting on May 15 and informed the Planning Commission that they had just learned of these proposals and their impact to their properties within the previous 72 hours.

The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population.

How can one base policy and procedures with such a low turnout?

This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community and in particular, the tax-paying property owners of the county.

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1269 units (see table below which is derived from the proposal) and only 1096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower income categories is 1460. But the County is proposing to develop over 10,000 housing units.

Housing type	Identified Need	Units In Process	Actual Need
Extremely low	1070	184	886
Low	700	490	210
Moderate	420	247	173
Above Market	1136	1345	-209

The

Inclusionary Housing Ordinance (IHO) is used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units would be built. This formula forces the County to approve the development of housing units **that are not needed and only amplify sprawl and negatively impact the environment.** As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades.

The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. I estimate that the County needs approximately \$35M per year to support the development of these units (1100 units x \$250K/unit divided by 8 years; note that moderate units do not need additional funding). This is not an insurmountable amount. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and an monstrous environmental impact.

Errors in the recommended sites

The published guidelines for the RHNA proposal include instructions to:

- 1) Protect desirable land uses
- 2) Prevent soil erosion and enhance water quality
- 3) Minimize risks from fire

This proposal fails on all three counts.

Furthermore, the proposal fails miserably on infrastructure requirements.

The Housing Element Sites Inventory Guidebook specifically states that the County is to:

Provide in the analysis a general description of any known environment or other features (floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites.....The analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities.

and

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program plan

The Staff's proposal fails on both requirements. Sites with floodplains, protected wetlands, oak tree preserves, and very high fire hazard are included in the proposal. Furthermore, sites without water resources, sewers etc., are also included. These sites need to be removed from the proposal.

Objections to sites 1-4 and 61-68 in the "South of Airport" vicinity

Taken together these sites have a capacity of 1835 units in the RHNA proposal. This is approximately 20% of the entire County's proposal. If this were to be completed, a fair estimate for the population of the proposed South of Airport housing would be approximately 3700 people, all located within 110 acres (according to the proposal), which is 0.17 square miles. This is a population density of over 19,000 people/sq mile. In comparison, the population density of the City of Monterey is

only 3,285 people/sq mile. In fact, the proposed South of Airport housing would have a higher population density than the city of San Francisco (18,633 people/sq mile).

The negative impact on the environment cannot be overstated.

There are numerous problems with the proposal for these sites. Specifically, regarding Sites 61-68:

- a. These sites will account for 417 housing units.
- b. The proposal is to remove existing houses to build affordable housing. The text regarding several of these seven sites says: ***“The existing development (house) at this site is assumed to be removed for higher density housing development to occur.”*** **Has the staff informed the homeowners and residents that the County is considering removing them from their properties?**
- c. The entrances and exits from these properties are single lane roads (not larger than a driveway and can only accommodate a single car in one direction) directly onto HW68. **In case of an emergency, how are approximately 750 cars going to exit using a single lane driveway onto Highway 68?**

Regarding all 12 sites in the “South of Airport” area (sites 1-4 and 61-68):

All sites fail on AB 1397 “realistic sites”. The State requires that all sites proposed be “realistic sites” and these sites all fail for the following reasons:

- **Environmentally sensitive area:** The Big Sur Land Trust (BSLT) has recently purchased a 50-acre parcel of land that is contiguous to these parcels and, together, form a wildlife corridor and essential fire break. The features of the purchased land will also be true for these parcels. These features include:
 - a. Preserving the cultural importance of the land to the Ohlone/Costanoan-Esselen Nation.
 - b. The wetlands conserved on this property trap sediment, improve water quality and decrease the flood risk for the downstream communities along the Canyon Del Rey watershed. These ecosystem benefits will help reduce climate change impacts related to increased storm flows of water and sediment.

- c. The wetlands also help to sequester carbon, and the property's location in a wildlife corridor will allow species to move across landscapes to find food, water and shelter.
 - d. Proper management of this land will reduce wildfire risk for the surrounding wildland urban interface of Monterey and Del Rey Oaks.
 - e. By preventing potential development, the BSLT is protecting important habitats that are part of a valuable wildlife corridor. Deer, coyote, mountain lions and black bears have been spotted on the land.
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From: [Lilly, Craig](#)
To: [293-pchearingcomments](#)
Subject: JUNE 5 PLANNING COMMISSION MEETING
Date: Friday, May 31, 2024 1:12:43 PM
Importance: High

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Objections for the lack of transparency by the Staff’s work

At the May 15, 2024 special meeting of the Planning Commission, Commission Diehl suggested that the perceived lack of transparency was due to the volume of information in the proposal. **THIS IS NOT THE CASE.** The lack of transparency is directly related to the staff’s omission of actively including the tax paying public, and particularly those residents who will be directly impacted by this proposal.

Our communities were not informed that there was any discussion regarding the RHNA work, the County’s site selection process, the County’s proposal nor how it would affect our communities. In fact, when we accidentally learned of the activity and then reached out to the staff (in early December 2023), we were told “it is too late to provide input or for the County to change its proposal.” The staff told us that notices were posted on the County’s website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn’t enough time for the staff to hear our concerns.

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The County Staff informed me that there were nine “pop-up” events but none in our community and the times and locations of these “pop-up” events were not advertised to us even though nearly 20% of the units in the proposal are within this community.

The County Staff had multiple meetings with “stake holders” which are curiously absent of property tax-paying homeowners and residents of the affected areas, but developers were included. Per the proposal, the stake holders included:

- i. Carmel Valley Association
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The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population (one person per 1000!). How can the County base policy and procedures with such a low turnout?

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Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program plan...

The Staff's proposal fails on both requirements. Sites with floodplains, protected wetlands, oak tree preserves, and very high fire hazard are included in the proposal. Furthermore, sites without water resources, sewers etc., are also included. These sites need to be removed from the proposal.

Objections to sites 1-4 and 61-68 in the "South of Airport" vicinity

Taken together these sites have a capacity of 1835 units in the RHNA proposal. This is approximately 20% of the entire County's proposal. If this were to be completed, a fair estimate for the population of the proposed South of Airport housing would be approximately 3700 people, all located within 110 acres (according to the proposal), which is 0.17 square miles. This is a population density of over 19,000 people/sq mile. In comparison, the population density of the City of Monterey is only 3,285 people/sq mile. In fact, the proposed South of Airport housing would have a higher population density than the city of San Francisco (18,633 people/sq mile).

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- b. The proposal is to remove existing houses to build affordable housing. The text regarding several of these seven sites says: “*The existing development (house) at this site is assumed to be removed for higher density housing development to occur.*” Has the staff informed the homeowners and residents that the County is considering removing them from their properties?
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- Vanishing Greenbelt. The removal of this greenbelt is a significant adverse impact aesthetically and visually as well as a loss of habitat for many keystone animal species that can be observed on the subject parcel. Frequent observations occur of Apex/keystone species such as Mountain Lion, Bobcat and Coyote as well as many avian species of special interest, such as red shouldered hawks and peregrine falcons. Just this past week, KWBW reported on sightings of both bears and mountain lions in the Jacks Peak neighborhood which is within a short walk of these parcels. See:

<https://www.facebook.com/100064912142998/posts/pfbid02iGA5UzZpuoAmstjiLESdDoMmStMdD3E9S1wmgESr3dUWNMEuVBRAPPjHhPuH1BzJl/?mibextid=cr9u03>

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Errors such as the above make the reader question the validity of the entire document. What other errors or omissions are in this document which was ‘hurried through’ and is now being ‘rushed through for approval’ because it is six-months late by the Staff and the consultants?

Summary

The Staff and the Supervisors have not provided its constituents with a transparent process, nor have they actively included the county’s major stakeholders, that is, the tax-paying residents. When reached by members of the public, the staff reported that the proposal could not be amended. When asked for meetings, the staff were typically too busy and responded to our questions in months rather than days.

The Staff spent nearly \$2M on consultants from Irvine, CA, and this proposal appears to be nothing more than an internet search using ‘Google Maps’ and ‘Siri’. The sloppiness of this report cannot be overstated. The viability of the sites was not confirmed. In many cases, the slopes of these sites are over 25 degrees, which makes them virtually impossible to build upon. Sites inside ‘extremely high fire danger zones’ should have been removed. Sites with archeological significance, or wetlands, should have been removed. The number of errors in this report is appalling. This makes one question how the County is spending our taxpayer money.

The County MUST find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle- and upper-income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1100 affordable housing units is not unreachable. This can be supported by beginning to think ‘outside the box’ with funding and focusing on redeployment of existing sites with existing water permits.

Finally, Commissioner Diehl said it succinctly when she summarized that ‘if you want something badly, that’s what you’re going to get. This is too important to get it wrong.’

Best, Craig Lilly

Monterey Resident, and Public Conservation/ Environmental Advocate

This E-mail, along with any attachments, is considered confidential and may well be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.

RSUSv12021

From: [Lilly, Craig](#)
To: [293-pchearingcomments](#); [100-District 1 \(831\) 647-7991](#); [100-District 2 \(831\) 755-5022](#); [100-District 3 \(831\) 385-8333](#); [100-District 4 \(831\) 883-7570](#); [100-District 5 \(831\) 647-7755](#)
Subject: Comments for the Jan 4 Supervisor Meeting regarding the RHNA proposal
Date: Friday, May 31, 2024 1:18:43 PM

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

The Staff's Affordable Housing (RHNA) Proposal must be rejected.

On May 6, 2024, the County published their 985-page Regional Housing Needs Assessment (RHNA) in response to the State's mandate. The work for this proposal started nearly two years ago, was known to be coming for several years, and the County spent nearly \$2M on consultants to prepare this proposal. With all that, they are still 6 months late.

On May 15, 2024, the County's Planning Commission reviewed a presentation by the staff on their work. The proposal was resoundingly rejected by the commission and virtually everyone in attendance (except by one developer).

The Potential Long-Term Effects of the Proposal

The staff analyzed that the County needed 3326 new housing units in the next 8 years. Commissioner Daniels rightly asked, "how many units are currently in the pipeline?" which would reduce this number. After subtracting the "pipeline" units, the ACTUAL need in the County is 1269 units. Adding the state-required 15% buffer should raise the proposal to 1460 units. But the staff is proposing that we build over 10,000 housing units!

While we can always build more units than proposed, it is imperative to propose the minimum number that the State mandates. The reason for this is very simple: once the plan is accepted, the State will require the County to rezone all the sites identified in the proposal into high density residential zones with up to 20 housing units per acre. Even more concerning is that this rezoning may be permanent! In fact, Director Spenser stated that "*it is difficult to reverse zoning decisions.*" While we may think that the Planning Commission can control the number of units built through the permitting process, the State is already planning to

move local control of RHNA identified sites to the State's HCD. Telling the State that we need 10,000 homes will virtually guarantee that permits for more housing than we need will eventually be approved. The only possible reason for advocating for 10,000 units is to subsidize the cost of building low-income housing units. Building 10,000 units is essentially building ten East Garrison communities. Can the Monterey Peninsula support that many new homes? Do we have the infrastructure for it? Can the environment survive it? The answer to all these questions is "no".

Funding for Affordable Housing

Commissioners Daniels and Diehl point out that, for the past several decades, the County has been using the Inclusionary Housing Ordinance (IHO) as a method to fund the building of Affordable Housing. The IHO requires developers to build one "affordable" house for every four "market" houses that they build. Both commissioners pointed out that this program has been an abject failure. It has failed to build the affordable housing that we need. There must be a better way to achieve the construction of 1200 affordable housing units without destroying the community that we love. At the May 15 meeting, Commissioner Diehl said: *we "cannot support going forward with the IHO as it exists now as a basis for identifying the number of sites as we see here."*

In March, I asked Director of Housing, Mr. Craig Spenser, "how much financial support would a developer need to build affordable housing and still make a profit?" His answer was "around \$250,000 for each unit" If one assumes that this is roughly correct, it is simple arithmetic to estimate that we need roughly \$35M per year in financial assistance to achieve our housing needs. Our County has a population of roughly 500,000 people. Distributed over the population, this is \$75 per person per year or \$6 per person per month. Obviously, there are other funding methods and algorithms that may be more equitable. In a County as large as ours, this can be done.

Objections for the lack of transparency

Our communities were not informed that there was any discussion regarding the County's site selection process, the County's proposal and how it would affect our communities. In fact, when we accidentally

learned of the activity and then reached out to the staff (in early December 2023), we were told “it is too late to provide input or for the County to change its proposal.” The staff told us that notices were posted on the County’s website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn’t enough time to hear our concerns.

I reached out to my Supervisor in February for a meeting which she arranged with the Staff four weeks later (in March). We provided the Staff with a list of questions, and it took the Staff 6 weeks after the meeting for them to reply.

The County Staff informed me that there were nine “pop-up” events but none in our community and the times and locations of these “pop-up” events were not advertised to us.

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How can one base policy and procedures with such a low turnout?

This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community and in particular, the tax-paying property owners of the county.

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1269 units (see table below which is derived from the proposal) and only 1096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower income categories is 1460. But the County is proposing to develop over 10,000 housing units.

Housing type	Identified Need	Units In Process	Actual Need
Extremely low	1070	184	886
Low	700	490	210
Moderate	420	247	173
Above Market	1136	1345	-209

The

Inclusionary Housing Ordinance (IHO) is used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units would be built. This formula forces the County to approve the development of housing units **that are not needed and only amplify sprawl and negatively impact the environment.** As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades.

The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. I estimate that the County needs approximately \$35M per year to support the development of these units (1100 units x \$250K/unit divided by 8 years; note that moderate units do not need additional funding). This is not an insurmountable amount. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and an monstrous environmental impact.

Errors in the recommended sites

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- 1) Protect desirable land uses
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This proposal fails on all three counts.

Furthermore, the proposal fails miserably on infrastructure requirements.

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C. Craig Lilly

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RSUSv12021

From: [Susan Weitz](#)
To: [293-phearingcomments](#)
Subject: Monterey RHNA Proposal for Low Cost Housing Objection
Date: Thursday, May 30, 2024 6:54:46 AM

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Your Staff’s RHNA proposal is deeply flawed and must be amended for the following reasons.

The Potential Long-Term Effects of this Proposal would be devastation for Monterey County!

The staff analyzed that the County needed 3,326 new housing units in the next 8 years. Commissioner Daniels rightly asked, “how many units are currently in the pipeline?” which would reduce this number. After subtracting the “pipeline” units, the ACTUAL need in the County is 1,269 units. Adding the state-required 15% buffer should raise the proposal to 1,460 units. But the staff is proposing that we build over 10,000 housing units!

While we can always build more units than proposed, it is imperative to propose the minimum number that the State mandates. The reason for this is very simple: once the plan is accepted, the State will require the County to rezone all the sites identified in the proposal into high density residential zones with up to 20 housing units per acre. Even more concerning is that this rezoning may be permanent! Director Spenser confirmed this at the May 15, 2024 meeting and further stated that “it is difficult to reverse zoning decisions.” While we may think that the Planning Commission can control the number of units built through the permitting process, the State is already planning to move local control of RHNA identified sites to the State’s HCD. Telling the State that we need 10,000 homes will virtually guarantee that permits for more housing than we need will eventually be approved.

The only possible reason for advocating for 10,000 units is to subsidize the cost of building low-income housing units. Building 10,000 units is essentially building ten East Garrison communities. Can the Monterey Peninsula support that many new homes? Do we have the infrastructure for it? Can the environment survive it? The answer to all these questions is “no”.

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3,764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1,269 units (see table below which is derived from the proposal) and only 1,096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower- and middle-income categories is 1260. But the County is proposing to develop over 10,000 housing units.

Housing type	Identified Need	Units In Process	Actual Need
Extremely low	1070	184	886
Low	700	490	210
Moderate	420	247	173
Above Market	1136	1345	-209

The Inclusionary Housing Ordinance (IHO) was used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units would be built. This formula forces the County to approve the development of (and permanently rezone the parcels for) housing units that are not needed and only amplify sprawl and negatively impact the environment. As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades.

The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing and a monstrous environmental impact.

Possible Funding for Affordable Housing

Commissioners Daniels and Diehl point out that, for the past several decades, the County has been using the Inclusionary Housing Ordinance (IHO) as a method to fund the building of Affordable Housing. Both commissioners pointed out that this program has been an abject failure. It has failed to build the affordable housing that we need. There must be a better way to achieve the construction of 1,100 affordable housing units (for the low and extremely low income categories) without destroying the community that we love. At the May 15 meeting, Commissioner Diehl said: we “cannot support going forward with the IHO as it exists now as a basis for identifying the number of sites as we see here.”

In March, our group asked Director of Housing, Mr. Craig Spenser, “how much financial support would a developer need to build affordable housing and still make a profit?” His answer was “around \$250,000 for each unit” If one assumes that this is roughly correct, it is simple arithmetic to estimate that we need roughly \$35M per year in financial assistance to developers to achieve our housing needs. Our County has a population of roughly 500,000 people. Distributed over the population, this is \$75 per person per year or \$6 per person per month. Obviously, there are other funding methods and algorithms that may be more equitable. In a County as large as ours, this can be done. This is not insurmountable, and we simply need the will to make it happen.

Objections for the lack of transparency by the Staff’s work

At the May 15, 2024 special meeting of the Planning Commission, Commission Diehl suggested that the perceived lack of

transparency was due to the volume of information in the proposal. THIS IS NOT THE CASE. The lack of transparency is directly related to the staff's omission of actively including the tax paying public, and particularly those residents who will be directly impacted by this proposal.

Our communities were not informed that there was any discussion regarding the RHNA work, the County's site selection process, the County's proposal nor how it would affect our communities. In fact, when we accidentally learned of the activity and then reached out to the staff (in early December 2023), we were told "it is too late to provide input or for the County to change its proposal." The staff told us that notices were posted on the County's website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn't enough time for the staff to hear our concerns.

Our group reached out to our Supervisor in February for a meeting which she arranged with the Staff four weeks later (in March). We provided the staff with a list of questions, and *it took 6 weeks (May) for Director Spenser to reply.*

The County Staff informed us that there were nine "pop-up" events but none in our community and the times and locations of these "pop-up" events were not advertised to us even though nearly 20% of the units in the proposal are within this community.

The County Staff had multiple meetings with "stake holders" which are curiously absent of property tax-paying homeowners and residents of the affected areas, but developers were included. Per the proposal, the stake holders included:

- i. Carmel Valley Association
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There are multiple sites (61-69 along HW 68 near Olmsted Road) in the proposal that identify a parcel of land with an existing residence. In the proposal, the staff assumes that the existing houses on several of these sites will be "removed". We understand that there are other sites in Carmel Valley that have similar designations. To our knowledge, none of these site owners have been informed of the Staff's recommendations. Several people showed up at the Planning Commission meeting on May 15 and informed the Planning Commission that they had just learned of these proposals and their impact on their properties within the previous 72 hours. This wasn't a matter that the proposal was difficult to read; this is simply that the community wasn't made aware of the activities of the Staff or their implications.

The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population (one person per 1000!). How can the County base policy and procedures with such a low turnout? *This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community, and particularly the tax-paying property owners of the county.*

Errors in the recommended sites

The published guidelines for the RHNA proposal include instructions to:

- 1) Protect desirable land uses
- 2) Prevent soil erosion and enhance water quality
- 3) Minimize risks from fire

This proposal fails on all three counts. Furthermore, the proposal fails miserably on infrastructure requirements.

The Housing Element Sites Inventory Guidebook specifically states that the County is to:

Provide in the analysis a general description of any known environment or other features (floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites.....The analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities.

&

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer and

dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program plan.

The Staff's proposal fails on both requirements. Sites with floodplains, protected wetlands, oak tree preserves, and very high fire hazard are included in the proposal. Furthermore, sites without water resources, sewers etc., are also included. These sites need to be removed from the proposal.

Objections to sites 1-4 and 61-68 in the "South of Airport" vicinity

Taken together these sites have a capacity of 1,835 units in the RHNA proposal. This is approximately 20% of the entire County's proposal. If this were to be completed, a fair estimate for the population of the proposed South of Airport housing would be approximately 3,700 people, all located within 110 acres (according to the proposal), which is 0.17 square miles. This is a population density of over 19,000 people/sq mile. In comparison, the population density of the City of Monterey is only 3,285 people/sq mile. In fact, the proposed South of Airport housing would have a higher population density than the city of San Francisco (18,633 people/sq mile). The negative impact on the environment cannot be overstated.

There are numerous problems with the proposal for these sites. Specifically, regarding Sites 61-68:

- a. These sites will account for 417 housing units.
- b. The proposal is to remove existing houses to build affordable housing. The text regarding several of these seven sites says: "*The existing development (house) at this site is assumed to be removed for higher density housing development to occur.*" Has the staff informed the homeowners and residents that the County is considering removing them from their properties?
- c. The entrances and exits from these properties are single lane roads (not larger than a driveway and can only accommodate a single car in one direction) directly onto HW68. In case of an emergency, how are approximately 750 cars going to exit using a single lane driveway onto Highway 68?

Regarding all 12 sites in the "South of Airport" area (sites 1-4 and 61-68):

All sites fail on AB 1397 "realistic sites". The State requires that all sites proposed be "realistic sites" and these sites all fail for the following reasons:

- Environmentally sensitive area: The Big Sur Land Trust (BSLT) has recently purchased a 50-acre parcel of land that is contiguous to these parcels and, together, form a wildlife corridor and essential fire break. The features of the purchased land will also be true for these parcels. These features include:
 - a. Preserving the cultural importance of the land to the Ohlone/Costanoan-Esselen Nation.
 - b. The wetlands conserved on this property trap sediment, improve water quality and decrease the flood risk for the downstream communities along the Canyon Del Rey watershed. These ecosystem benefits will help reduce climate change impacts related to increased storm flows of water and sediment.
 - c. The wetlands also help to sequester carbon, and the property's location in a wildlife corridor will allow species to move across landscapes to find food, water and shelter.
 - d. Proper management of this land will reduce wildfire risk for the surrounding wildland urban interface of Monterey and Del Rey Oaks.
 - e. By preventing potential development, the BSLT is protecting important habitats that are part of a valuable wildlife corridor. Deer, coyote, mountain lions and black bears have been spotted on the land.
 - f. This preservation supports the State's 30x30 goals of protecting 30% of California lands and waters by 2030
- Water: Recently, a developer investigated the availability of water on parcels 2-4 by drilling, for the purpose of building a development using the Affordable Housing Overlay. The study concluded that there was insufficient water to proceed without additional water permits (page 3-42 in the proposal). However, no additional water permits are available in the county. How does the County propose to build approximately 10,000 housing units without water, and specifically, over 1,800 units on the South of Airport sites? As stated in the proposal, water treatment is expensive. A more realistic approach would be to focus on fewer locations and where water is already available. This can be achieved by focusing on redevelopment of existing buildings and converting them into affordable housing units (as has been done in Salinas at the Rabobank project).
- Traffic: Traffic on HW 68 is already congested. Bringing affordable housing closer to jobs is certainly the correct approach but doing so by gridlocking HW 68 is not reasonable. The additional units proposed for the "South of Airport" area (1835 total units) would add over 3500 cars to the intersection of HW 68 with Olmsted Road and Josselyn Canyon Road. Gridlocking HW 68 at Olmsted Road would severely impact ingress and egress to and from Monterey Regional Airport, an economic lifeline to the County. Furthermore, in case of an emergency, it would be impossible to exit these properties.

- **Air quality:** The congested traffic will cause significant deterioration in local air quality, both to onsite residents of the new development and to nearby existing populations. The specific pollutants of public health concern are sulfur dioxide, oxides of nitrogen, carbon monoxide and carbon fiber from tires. Approximately 20,000 deaths per annum occur in the United States from these air pollutants. The additional pollutants will certainly decrease the health of this community.
- **Fire hazard:** This area is in a “high fire danger zone” and is adjacent to an “extremely high fire danger zone.” At present, it is virtually impossible to obtain fire insurance for most houses in the area. Homeowners and residents in this area will have to bear the burden of self-insuring but affordable housing is for low-income households who cannot afford to self-insure. Additionally, one of the important functions of the existing greenbelt zoning gives the entire community an important firebreak. CALFIRE depends on this parcel for fire protection of this whole region. These parcels are effectively the last line of defense to repel a wildfire from entering the City of Monterey. These parcels were used extensively by CALFIRE for staging during the last major wildfire.
- **Airport noise:** The takeoff noise of individual flights over the subject parcel needing rezoning could reach 85 decibels or higher. Not only is this level high enough to cause progressive hearing loss to the 3,000+ residents of the subject parcels, but that sound level would make a simple child pedestrian crossing of Olmstead a life-threatening event for both children and seniors, who may cross Olmstead frequently but cannot hear oncoming cars due to the noise from plane engines.
- **Vanishing Greenbelt.** The removal of this greenbelt is a significant adverse impact aesthetically and visually as well as a loss of habitat for many keystone animal species that can be observed on the subject parcel. Frequent observations occur of Apex/keystone species such as Mountain Lion, Bobcat and Coyote as well as many avian species of special interest, such as red shouldered hawks and peregrine falcons. Just this past week, KWBW reported on sightings of both bears and mountain lions in the Jacks Peak neighborhood which is within a short walk of these parcels. See: [KSBW TV Action News 8](#)



- **Safety (flight crash risk):** Within the past 3 years, a plane from Monterey Airport crashed into a single-family residence located approximately 1 mile south of airport. Fortunately, no one was home at the time and the casualties were limited to the pilot and her passenger. This will not be the case with such a high-density development which is far closer to the airport. In the event of a similar accident hitting the proposed development, the casualties would number in the hundreds if not thousands.
- **Carcinogenic Aquifer Plume emanating from Fort Ord.** It is well established that there are several carcinogenic and toxic chemicals in the groundwater emanating from Fort Ord. It is also known that this subsurface water plume is presently moving in the direction of the proposed rezoning parcel, if not already present beneath the subject parcel. This is a serious threat to residents of the subject parcels, particularly to children who will predictably explore the soil of their neighborhood.

Errors in proposal for all the South of Airport sites:

The parcels are all graded on an Amenity Point System which is based upon distances to needed amenities, such as grocery stores, jobs and doctors’ offices. The stated distances in the proposal from these sites to these amenities are incorrect and hence, also the subsequent Amenity Grade. For these 12 sites, the description identifies a doctor’s office that does not exist and distances to amenities that are incorrect. The table below illustrates the errors, where the Distance in the Proposal is compared to the Actual Distance:

Entity	Distance in Proposal (miles)	Actual Distance (miles)
Safeway	1	3
Doctors on Duty (Monterey)	1	5
Doctors on Duty (Del Rey)	1	DOES NOT EXIST
Seaside Family Health Clinic	0.5	3
Foothill School	0.5	Not Available

The Foothill Elementary School is not an open school. The City of Monterey closed the site several years ago. It is currently leased to a chartered school and is therefore unavailable for public use. The County cannot use this in the amenity point system.

Errors such as the above make the reader question the validity of the entire document. What other errors or omissions are in this document which was ‘hurried through’ and is now being ‘rushed through for approval’ because it is six-months late by the Staff and the consultants?

Summary

The Staff and the Supervisors have not provided its constituents with a transparent process, nor have they actively included the county’s major stakeholders, that is, the tax-paying residents. When reached by members of the public, the staff reported that the proposal could not be amended. When asked for meetings, the staff were typically too busy and responded to our questions in months rather than days.

The Staff spent nearly \$2M on consultants from Irvine, CA, and this proposal appears to be nothing more than an internet search using “Google Maps” and “Siri”. The sloppiness of this report cannot be overstated. The viability of the sites was not confirmed. In many cases, the slopes of these sites are over 25 degrees, which makes them virtually impossible to build upon. Sites inside “extremely high fire danger zones” should have been removed. Sites with archeological significance, or wetlands, should have been removed. The number of errors in this report is appalling. This makes one question how the County is spending our tax-payer money.

The County MUST find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle- and upper-income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1100 affordable housing units is not unreachable. This can be supported by beginning to think “outside the box” with funding and focusing on redeployment of existing sites with existing water permits.

Please consider all my objections to this RHNA proposal so that Monterey County can continue to be a beautiful place to work and live!

Regards.

*Susan Weitz
susanweitz@yahoo.com
cell: 831-233-3182*

From: [Stephanie Stevenson](#)
To: [293-ncheamqcomments](#)
Subject: Olmsted proposal
Date: Friday, May 31, 2024 8:35:16 AM

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Sent from my iPhone

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- **Vanishing Greenbelt.** The removal of this greenbelt is a significant adverse impact aesthetically and visually as well as a loss of habitat for many keystone animal species that can be observed on the subject parcel. Frequent observations occur of Apex/keystone species such as Mountain Lion, Bobcat and Coyote as well as many avian species of special interest, such as red shouldered hawks and peregrine falcons. Just this past week, KWBW reported on sightings of both bears and mountain lions in the Jacks Peak neighborhood which is within a short walk of these parcels.

See: <https://www.facebook.com/100064912142998/posts/pfbid02iGA5UzZpuoAmstjilESdDoMmStMdD3E9S1wmqESr3dUWNMEuVBRAPPJHhPuH1BzJl/?mibextid=cr9u03>

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Summary

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The County MUST find a different way to fund affordable housing. The IHO is a failed concept and if continued, will only create more middle- and upper-income developments (potentially for vacation homes rather than our workers) in our community. Our goal of 1100 affordable housing units is not unreachable. This can be supported by beginning to think "outside the box" with funding and focusing on redeployment of existing sites with existing water permits.

Finally, Commissioner Dieht said it succinctly when she summarized that "if you want something badly, that's what you're going to get. This is too important to get it wrong."

From: [Melinda Stewart](#)
To: [293-pchearingcomments](#)
Subject: Opposed to Olmsted development proposal;
Date: Friday, May 31, 2024 10:07:21 AM

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

As residents of the 68 corridor we are truly appalled at the above proposal and cannot imagine any worse alternative..

On all counts, the above proposal creates potentially disastrous consequences for the community and potential residents...fire and safety

risks,lack of water, untenable air traffic noise and danger, wildlife and heritage oak destruction,unbelievable traffic congestion for

residents and travelers alike, ruination of a rare virgin scenic corridor. Other viable alternatives in developed areas were NEVER considered .

It is incomprehensible that our hard earned tax dollars to the the tune of 2 million were misappropriated to an incompetent consulting group in Irvine,Ca!.

Given the total lack of transparency to local residents, I would hope that our voices are now heard and that this unfortunate

travesty is abandoned..We will seek a review of planning protocols as well as decision makers that have left us in this unfortunate position. I request

that my letter be forwarded to the planning commission and the board of supervisors.

Thank you, Melinda Stewart

From: woehlrwld@aol.com
To: [293-pchearingcomments](#)
Subject: Comments for the Jun 4 Supervisor Meeting regarding the RHNA proposal
Date: Sunday, June 2, 2024 1:26:49 PM
Attachments: [Comments for the Jun 4 Supervisor Meeting regarding the RHNA proposal.docx](#)

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Please see attached letter

The Staff's Affordable Housing (RHNA) Proposal must be rejected.

On May 6, 2024, the County published their 985-page Regional Housing Needs Assessment (RHNA) in response to the State's mandate. The work for this proposal started nearly two years ago, was known to be coming for several years, and the County spent nearly \$2M on consultants to prepare this proposal. With all of those resources at their disposal, they are still 6 months late.

On May 15, 2024, the County's Planning Commission reviewed a presentation by the staff on their work. The proposal was resoundingly rejected by the commission and virtually everyone in attendance (with the exception of one developer).

The Potential Long-Term Effects of the Proposal

The staff analyzed that the County needed 3326 new housing units in the next 8 years. Commissioner Daniels rightly asked, "how many units are currently in the pipeline?" which would reduce this number. After subtracting the "pipeline" units, the ACTUAL need in the County is 1269 units. Adding the state-required 15% buffer should raise the proposal to 1460 units. But the staff is proposing that we build over 10,000 housing units!

While we can always build more units than proposed, it is imperative to propose the minimum number that the State mandates. The reason for this is very simple: once the plan is accepted, the State will require the County to rezone all the sites identified in the proposal into high density residential zones with up to 20 housing units per acre. Even more concerning is that this rezoning may be permanent! In fact, Director Spenser stated that "*it is difficult to reverse zoning decisions.*" While we may think that the Planning Commission can control the number of units built through the permitting process, the State is already planning to move local control of RHNA identified sites to the State's HCD. Telling the State that we need 10,000 homes will virtually guarantee that permits for more housing than we need will eventually be approved.

The only possible reason for advocating for 10,000 units is to subsidize the cost of building low-income housing units. Building 10,000 units is essentially building ten East Garrison communities. Can the Monterey Peninsula support that many new homes? Do we have the infrastructure for it? Can the environment survive it? The answer to all these questions is a resounding "no".

Funding for Affordable Housing

Commissioners Daniels and Diehl point out that, for the past several decades, the County has been using the Inclusionary Housing Ordinance (IHO) as a method to fund the building of Affordable Housing. The IHO requires developers to build one "affordable" house for every four "market" houses that they build. Both commissioners pointed out that this program has been an abject failure. It has failed to build the affordable housing that we need. There must be a better way to achieve the construction of 1200 affordable housing units without destroying the community that we love. At the May 15 meeting, Commissioner Diehl said: we "*cannot support going forward with the IHO as it exists now as a basis for identifying the number of sites as we see here.*"

In March, the Director of Housing, Mr. Craig Spenser, was asked "how much financial support would a developer need to build affordable housing and still make a profit?" His answer was "around \$250,000 for each unit" If one assumes that this is roughly correct, it is simple arithmetic to estimate that we need roughly \$35M per year in financial assistance to achieve our housing needs. Our County has a population of roughly 500,000 people. Distributed over the population, this is \$75 per person per year or \$6 per person per month. Obviously, there are other funding methods and algorithms that may be more equitable. In a County as large as ours, this can be done.

Objections for the lack of transparency

Our communities were not informed that there was any discussion regarding the County's site selection process, the County's proposal and how it would affect our communities. In fact, when we accidentally

learned of the activity and then reached out to the staff (in early December 2023), we were told “it is too late to provide input or for the County to change its proposal.” The staff told us that notices were posted on the County’s website. This conversation occurred nearly 6 months before the proposal was published and yet, there wasn’t enough time to hear our concerns.

We reached out to the Supervisor in February for a meeting which she arranged with the Staff four weeks later (in March). We provided the Staff with a list of questions, and it took the Staff 6 weeks after the meeting for them to reply.

The County Staff informed us that there were nine “pop-up” events but none in our community and the times and locations of these “pop-up” events were not advertised to us.

According to the proposal, the County Staff had multiple meetings with “stake holders” which are curiously absent of property tax-paying homeowners and residents of the affected areas, but developers were included. Per the proposal, the stake holders included:

- Carmel Valley Association
- Tribal Communities
- Fair Housing Providers
- Housing Advocacy and Community Organizations
- Affordable Housing Managers
- Ag-based business advocacy groups
- Hospitality community
- Market housing developers
- Affordable housing developers

There are multiple sites (61-69 along HW 68 near Olmsted Road) in the proposal that identify a parcel of land with an existing residence. In the proposal, the staff assumes that the existing houses on several of these sites will be “removed”. We understand that there are other sites in Carmel Valley that have similar designations. To our knowledge, none of these site owners have been informed of the Staff’s recommendations. Several people showed up at the Planning Commission meeting on May 15 and informed the Planning Commission that they had just learned of these proposals and their impact to their properties within the previous 72 hours.

The Staff seems to be proud that their survey of our County included 532 respondents. This represents approximately 0.1% of our population. How can one base policy and procedures with such a low turnout?

This was not a transparent effort. It seems to have been designed to hide the activities of the staff and their consultants from the community and in particular, the tax-paying property owners of the county.

Calculation and staff recommendations for the County

As mentioned earlier, the staff-reported need (according to the report) is 3764 units, but the ACTUAL need is for 886 extremely low, 210 low and 173 moderate housing units, for a total of 1269 units (see table below which is derived from the proposal) and only 1096 units are for the low and extremely low demographic. Adding the state-required 15% buffer brings the total number of housing units needed for these lower income categories is 1460. But the County is proposing to develop over 10,000 housing units.

Housing type	Identified Need	Units In Process	Actual Need
Extremely low	1070	184	886
Low	700	490	210
Moderate	420	247	173
Above Market	1136	1345	-209

The Inclusionary Housing Ordinance (IHO) is used to justify these additional units. The IHO places an unnecessary overhead of unneeded market rate units; in this case, over 8,000 unnecessary housing units to be built. This formula forces the County to approve the development of housing units **that are not needed and only amplify sprawl and negatively impact the environment**. As mentioned by Commissioners Daniels and Diehl, the IHO has been a failure for decades.

The County needs to investigate other funding mechanisms such as vouchers, low-income housing tax credits, property tax increases and grants. It is estimated that the County needs approximately \$35M per year to support the development of these units (1100 units x \$250K/unit divided by 8 years; note that moderate units do not need additional funding). This is not an insurmountable amount. The 80/20 rule (the IHO rule) simply leads to gross overbuilding of unneeded higher income housing with an accompanied monstrous environmental impact.

Errors in the recommended sites

The published guidelines for the RHNA proposal include instructions to:

- 1) Protect desirable land uses
- 2) Prevent soil erosion and enhance water quality
- 3) Minimize risks from fire

This proposal fails on all three counts. Furthermore, the proposal fails miserably on infrastructure requirements.

The Housing Element Sites Inventory Guidebook specifically states that the County is to:

Provide in the analysis a general description of any known environment or other features (floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites.....The analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities and

Determine if parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program plan

The Staff's proposal fails on both requirements. Sites with floodplains, protected wetlands, oak tree preserves, and very high fire hazard are included in the proposal. Furthermore, sites without water resources, sewers etc., are also included. These sites clearly need to be removed from the proposal.

Objections to sites 1-4 and 61-68 in the "South of Airport" vicinity

Taken together these sites have a capacity of 1835 units in the RHNA proposal. This is approximately 20% of the entire County's proposal. If this were to be completed, a fair estimate for the population of the proposed South of Airport housing would be approximately 3700 people, all located within 110 acres (according to the proposal), which is 0.17 square miles. This is a population density of over 19,000 people/sq mile. In comparison, the population density of the City of Monterey is only 3,285 people/sq mile. In fact, the proposed South of Airport housing would have a higher population density than the city of San Francisco (18,633 people/sq mile).

The negative impact on the environment cannot be overstated.

There are numerous problems with the proposal for these sites. Specifically, regarding Sites 61-68: These sites will account for 417 housing units.

The proposal is to remove existing houses to build affordable housing. The text regarding several of these seven sites says: "*The existing development (house) at this site is assumed to be removed for higher density housing development to occur.*" **Has the staff informed the homeowners and residents that the County is considering removing them from their properties?**

The entrances and exits from these properties are single lane roads (not larger than a driveway and can only accommodate a single car in one direction) directly onto HW68. **In case of an emergency, how are approximately 750 cars going to exit using a single lane driveway onto Highway 68?**

Regarding all 12 sites in the “South of Airport” area (sites 1-4 and 61-68):

All sites fail on AB 1397 “realistic sites”. The State requires that all sites proposed be “realistic sites” and these sites all fail for the following reasons:

Environmentally sensitive area: The Big Sur Land Trust (BSLT) has recently purchased a 50-acre parcel of land that is contiguous to these parcels and, together, form a wildlife corridor and essential fire break. The features of the purchased land will also be true for these parcels. These features include: Preserving the cultural importance of the land to the Ohlone/Costanoan-Esselen Nation.

The wetlands conserved on this property trap sediment, improve water quality and decrease the flood risk for the downstream communities along the Canyon Del Rey watershed. These ecosystem benefits will help reduce climate change impacts related to increased storm flows of water and sediment.

The wetlands also help to sequester carbon, and the property’s location in a wildlife corridor will allow species to move across landscapes to find food, water and shelter.

Proper management of this land will reduce wildfire risk for the surrounding wildland urban interface of Monterey and Del Rey Oaks.

By preventing potential development, the BSLT is protecting important habitats that are part of a valuable wildlife corridor. Deer, wild turkey, coyote, mountain lions and black bears have been spotted on the land.

This preservation supports the State’s 30×30 goals of protecting 30% of California lands and waters by 2030,

Water: Recently, a developer investigated the availability of water on parcels 2-4 by drilling, for the purpose of building a development using the Affordable Housing Overlay. The study concluded that there was insufficient water to proceed without additional water permits (page 3-42 in the proposal). However, no additional water permits are available in the county. **How does the County propose to build approximately 10,000 housing units without water, and specifically, over 1800 units on the South of Airport sites?** As stated in the proposal, water treatment is expensive. *A more realistic approach would be to focus on locations where water is already available.* This can be achieved by focusing on redevelopment of existing buildings and converting them into affordable housing units (as has been done in Salinas on the Rabobank project).

Traffic: Traffic on HW 68 is already congested. Bringing affordable housing closer to jobs is certainly the correct approach but doing so by gridlocking HW 68 is not reasonable. The additional units proposed for the “South of Airport” area (1835 total units) would presumably add over 3500 cars to the intersection of HW 68 with Olmsted Road and Josselyn Canyon Road. Gridlocking HW 68 at Olmsted Road would severely impact ingress and egress to and from Monterey Regional Airport, an economic lifeline to the County. One must also consider the additional airport traffic as the Monterey Airport District builds to increase the size and capacity of airport passenger traffic. Furthermore, in case of an emergency, it would be unfeasible to exit these properties.

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Finally, the Supervisors CANNOT accept an analysis and proposal that is riddled with errors. Commissioner Diehl said it succinctly when she summarized that ***“if you want something badly, that’s what you’re going to get. This is too important to get it wrong.”***

We ask that you please reconsider these proposals and find a better solution to these housing issues that will fall within the stated guidelines and above all, be transparent with your tax-paying constituents. I urge you to exercise restraint and apply reasonable thought to these requirements as you move this process forward.

Respectfully submitted,

Markus Woehler

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