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June 12, 2017

Mary Adams, Chair, and Members of the Board of Supervisors  
County of Monterey  
168 West Alisal Street  
Salinas, CA 93901

Re: Support for Planning Commission recommendation to deny PLN140089  
subdivision project, June 27, 2017 meeting

Dear Chair Adams and Supervisors Alejo, Parker, Phillips and Salinas:

We represent a group of business owners, employees, and residents who, along with the Carmel Valley Association, oppose the project and ask you to support and affirm the Planning Commission's recommendation. We raise and incorporate all issues presented by us and others to the Planning Commission, as if fully set forth herein. Many comments are included in your packet.

The proposed subdivision violates the County General Plan and there is only one result possible: denial. (Planning & Zoning Law, Gov. Code § 65000 et seq.) The project does not comply with express language in General Plan policy LU-1.19 and thus must be denied. Subdivisions which are inconsistent with the General Plan subvert the integrity of the planning process. To make matters worse, the EIR did not adequately disclose the inconsistency with the policy.

The EIR admits that the project would have significant and unavoidable impacts on traffic. On that point alone this County has absolute discretion to deny project and the County's decision to deny it on that basis will not be overturned. (See CEQA Guidelines, §§ 15042, 15002, subd. (h)(5); see Pub. Resources Code, § 21081.) To top it off, the EIR underestimates the traffic impacts because the EIR incorrectly claims that Highway One is a so-called "urban street." Highway One in the Carmel area does not meet the specific defined characteristics of an "urban street": it has no sidewalks, no bicycle lanes, no dedicated transit lanes, very few public buses, and contains the only three stop lights in an approximately 100-mile stretch.

The project is seeking to be treated preferentially and inconsistently with the site's zoning and with other properties within the same zone. The project seeks spot zoning for no good reason and approving it would be inconsistent with the law.

Request

The Board should affirm the Planning Commission recommendation to deny the project and direct staff to return to the Board on July 11 with a draft resolution identifying all of the reasons and evidence that supports denial. Thank you.

Mary Adams, Chair, and Members of the Board of Supervisors  
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Projects that are denied do not need to comply with CEQA, and thus the Board should not certify the flawed EIR.

Very truly yours,

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