

AMBAG
ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

October 13, 2008

Mr. Carl Holm
Monterey County
Planning Department
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

**RE: MCH# 20080902 – Draft Environmental Impact Report for the
Draft Environmental Impact Report for the 2007
Monterey Co. General Plan**

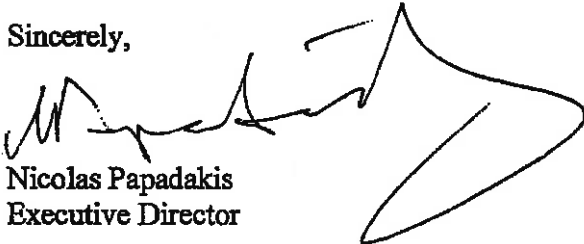
Dear Mr. Holm:

AMBAG's Regional Clearinghouse circulated a summary of notice of your environmental document to our member agencies and interested parties for review and comment.

The AMBAG Board of Directors considered the project on **October 8, 2008** and has no comments at this time.

Thank you for complying with the Clearinghouse process.

Sincerely,


Nicolas Papadakis
Executive Director



ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

Monterey County
Planning and Building
Inspection Administration

January 23, 2009

FEB 13 2009
RECEIVED

Mr. Carl Holm
County of Monterey
Planning Department
168 W. Alisal Street, 1st Floor
Salinas, CA 93901

**RE: MCH# 20081208 – Notice of Availability
2007 General Plan Draft EIR**

Dear Mr. Holm:

AMBAG's Regional Clearinghouse circulated a summary of notice of your environmental document to our member agencies and interested parties for review and comment.

The AMBAG Board of Directors considered the project on January 14, 2009 and has no comments at this time.

Thank you for complying with the Clearinghouse process.

Sincerely,

John Doughty
Executive Director

1



City of Gonzales

P.O. BOX 647
PHONE: (831) 675-5000

147 FOURTH ST.
FAX: (831) 675-2644

GONZALES, CALIFORNIA 93926
www.ci.gonzales.ca.us

Monterey County
Planning and Building
Inspection Administration

January 5, 2009

JAN 08 2009

RECEIVED

Maria Orozco
Mayor

Fernando Armenta, Chairman
Monterey County Board of Supervisors
168 W. Alisal Street, Floor 1
Salinas; CA 93901

Scott Funk
Mayor Pro Tem

Re: *City of Gonzales. Comments on 2007 Monterey County General Plan Update*

Man Gourley
Councilmember

Dear Chairman Armenta and Members of the Board of Supervisors:

René L. Mendez
City Manager

The City of Gonzales continues to follow the evolution of the County General Plan Update because our interest in the future- of the County and because of the Update's potential effects upon the City of Gonzales. At several times during the County General Plan Update process the City has offered comments, most recently by letters on November 21, 2006 and December 4, 2006.

The City appreciates that the County has made various adjustments to certain plan policies along the lines that we previously requested. However, we believe that several parts of the plan text. still warrant adjustment. Attached to this letter, and indicated by *italics*, are comments on specific policies that we recommend be modified. These are the same comments that the City made on these specific policies in the letter of November 21, 2006. The County policies of concern are included for reference.

Please accept our congratulations that the General Plan Update is nearing completion. We will appreciate *your* further considerations of our attached recommendations.

Sincerely,

Maria G co, I' ayotJ



CITY OF GONZALES
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BILL FARREL, AICP
DIRECTOR OF PLANNING & EC NOMIC
DEVELOPMENT
bfaael@ci.gonzales.ca

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Gonzales will-continue to be a safe, clean, family-friendly community, diverse in heritage, and committed to working collaboratively to preserve and retain its small town charm

CITY COUNCIL
CITY OF GONZALES
COMMENTS ON SELECTED GENERAL PLAN UPDATE POLICIES
January 5, 2008

PolicyLIT-2.15 "Work with AMBAG and, cities to direct the majority of urban growth including higher density housing development into cities and their sphere of influence with an emphasis on redevelopment and infill."

Comment: Gonzales is essentially built-out with only a handful of remaining vacant or under-utilized parcels, all of which are small and together cannot provide for more than about ten additional dwellings. These cannot make a dent in the level or residential demand projected for the area. Further, the City's ability to promote redevelopment of residential properties is almost non-existent, and has been made even more limited by recent case law. Any real response to growth pressures for residential, commercial, industrial and public uses will have to be through conversion of unincorporated agricultural properties general east of and outside the City's current boundaries.

This proposed General Plan policy has the effect of forcing higher density development into the cities that already have relatively high density, while the county General Plan Update continues, to allow low-density, upscale housing in the outlying areas. It is important to keep in mind that the cities need some areas of relatively lower density, large lot residential development in order to encourage higher-end housing and a socio-economic balance and all the benefits that can bring to the life of the city. If the County wishes to retain this policy then it should conform to the same community development standards as the cities and the Plan should be amended to make that happen so that County development is also at higher densities.

PolicyLU-2.19 The County shall critically review development proposals and general plan amendments within the cities to assure that the impacts of growth in the cities on the County's infrastructure are adequately quantified and fully mitigated."

Comment: Projects upon which the County should comment are generally defined by the inter-governmental referral process defined in the government code. These are generally new projects on the cities' edges. Mitigation requirements are typically established through CEQA compliance documents. We do not disagree that development within cities affects County infrastructure, but it is equally true that County development affects the infrastructure of the cities. The City of Gonzales is heavily impacted by traffic, especially heavy trucks that originate in the County. The City provides the affordable housing that supports agricultural workers within the County and bears the related services costs. What is needed is an overall assessment of shared infrastructure impacts and a mutually acceptable program for mitigation. Short of that, the County could find the cities demanding mitigations of all kinds for County projects. This policy should be

Gonzales will continue to be a safe, clean, family-friendly community, diverse in heritage, and committed to working collaboratively to preserve and retain its small town charm

deleted or revised to state that "The County will coordinate with the cities to evaluate development proposals both in the County and within the cities in order to discuss issues of mutual concern and to mitigate, where feasible impacts on respective infrastructure".

3

Policies AG-2.1 through 2.3

AG-2.1 "Agricultural support facilities such as coolers, cold storage, warehouses, parking lots, greenhouses, temporary and permanent worker housing and offices, processing equipment and facilities, agricultural research facilities, loading docks, workshops established to serve on-site and/or off-site farming and ranching activities shall be considered compatible and appropriate uses in the Farmlands, Permanent Grazing, and Rural Grazing land use designations. The County shall establish an ordinance that determines which uses require a discretionary permit."

AG-2.2 "The establishment and retention of a broad range of agricultural support businesses and services to enhance the full development potential of the agricultural industry in the County shall be encouraged and supported."

AG-2.3 "Agricultural processing facilities for products grown in and out of the County are compatible and appropriate land uses in the Farmlands, Permanent Grazing and Rural Grazing land use designations."

4

Comment: These policies are a major expansion of the range of uses allowed by the County in the past, and in essence allow gradual conversion of the County's best agricultural lands into an agricultural industrial park. For many years the County's policy, which worked well, was to limit uses on agriculturally zoned property to those uses supporting agriculture on that site. The current draft Plan language is a major change in the County's former protective treatment of the agricultural areas. This new language will result in conversion of significant areas into inappropriate uses, and increase rural traffic and roadway safety problems that are already significant in several areas of the Salinas Valley. These policies encourage isolated work environments instead of putting workers within cities where they can be housed and enjoy services. These policies work against creating a good jobs/housing balance within the cities and County.

Agricultural support and processing facilities are needed, but most of these facilities should be located within the designated agricultural industrial parks of the Salinas Valley cities, where infrastructure has been developed at considerable public expense. The encouragement of these uses outside the cities undermines the financial viability the established and traditional farm service centers. If the County wishes to allow a range of agricultural support uses on the farms, then these should be limited to the principal of allowing only those uses that must be located on the farm to function at all and that serve only that farm property. The City requests these policies be revised to direct future agricultural support and processing uses to established industrial parks in the incorporated cities. Uses allowed in the rural farming areas should be limited to those uses that are soils dependent or that cannot effectively function except on the farm site and which serve only that farm site.

Gonzales will continue to be a safe, clean, family-friendly community, diverse in heritage, and committed to working collaboratively to preserve and retain its small town charm



Sent Via E-mail and Certified Mail

Monterey County
Planning and Building
Inspection Administration

FEB 02 2009

RECEIVED
read CEQA comments
2/2/09 6:20pm

January 29, 2009

Carl Holm, Assistant Director
County of Monterey
Planning Department
168 West Alisal, 2nd Floor
Salinas, CA 93901

Subject: Comments on 2007 Monterey County General Plan Draft Environmental Impact Report (September 2008) - County File # PLN070525

Dear Mr. Holm,

Thank you for the opportunity to comment on the 2007 Monterey County General Plan Draft Environmental Impact Report (DEIR). The purpose of this letter is to provide comments on the adequacy of the DEIR. The City of King's primary considerations pertain to impacts on agricultural lands and City-centered growth.

The following comments provide an overview of the policy and mitigation considerations that the City of King would like the County to address in the 2007 Monterey County General Plan and DEIR.

- Impact AG-1 (Loss of Important Farmland) states that 2,571 acres of Important Farmland will be removed from the agricultural land use designation through General Plan buildout. The DEIR should describe the type, amount, and location of farmland conversion resulting directly or indirectly from both project implementation and growth inducement. Feasible mitigation measures should be considered if implementation of the project will result in any conversion of Important Farmland. Consideration should be given to the purchase of agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land, as well as for the mitigation of growth inducing and cumulative impacts on agricultural land. Conservation easements can protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guidelines §15370. 1
- Impact AG-1 (Loss of Important Farmland) evaluates policies from the General Plan Agriculture Element that are intended to minimize adverse impacts on the conversion of Important Farmland to non-agricultural uses. However, the analysis does not acknowledge the inconsistency between the city-centered growth concept supported by the General Plan and Policies AG-2.1 and AG-2.3. These policies promote the development of agricultural support and processing facilities in the unincorporated area on lands designated as Farmland, Permanent Grazing and Rural Grazing. The General Plan is overly vague in its definition of agricultural support facilities: 2

AGRICULTURAL SUPPORT FACILITY means the use of a structure, land or land and structure principally established to support on-site and/or off-site farming or

ranching activities including but not limited to coolers, cold storage, loading docks, and workshops.

While the City of King strongly supports the agricultural industry, Policies AG-2.1 and AG-2.3 could lead to the development of a more industrial character in the unincorporated areas of the County, rather than preserve the rural environment and important farmland. To be consistent with the city-centered growth concept, the County should include mitigation measures or General Plan programs to direct these industrial facilities to more appropriate areas within the incorporated cities and close to infrastructure and housing.

- Impact AG-2 (Agricultural Use Zoning and Williamson Act Contracts) discusses potential conflicts between the 2007 General Plan and agriculturally zoned land or land under a Williamson Act contract. However the discussion does not adequately address the CEQA threshold - *conflict with existing zoning for agricultural use or a Williamson Act contract*. The discussion should be expanded to address and mitigate the following issues:
 - Additional impacts the project may have on lands under Williamson Act contract such as potential contract cancellations or nonrenewals.
 - Whether the project may result in zoning precluding agricultural use in agricultural preserve areas as defined in the Williamson Act (Government Code § 51230).
 - Impacts on current and future agricultural operations, land-use conflicts, and potential increases in property values and taxes from project implementation.

Thank you again for the opportunity to comment on the DEIR. The staff contact in this office is Maricruz Aguilar, Assistant Planner. Please contact her as needed with any questions (831) 386-5916.

Sincerely,



Michael Powers
City Manager

cc: City Manager
City Council
Community Development Department
City Clerk

Calderon, Vanessa A. x5186

From: Maricruz Aguilar [maguilar@kingcity.com]
Sent: Monday, February 02, 2009 6:20 PM
To: ceqacomment
Subject: City of King Comment Letter - County GP DEIR

To Whom It May Concern:

I am attaching an electronic copy of the City of King's comments regarding the Monterey County's General Plan Draft EIR. Please feel free to contact me if you have any questions.

Original will follow.

Thank you,

Maricruz Aguilar, Assistant Planner

02/03/2009



City of Marina
 211 HILLCREST AVENUE
 MARINA, CALIFORNIA 93933
 831-884-1278 fax 831-384-9148
 www.ci.marina.ca.us

October 27, 2008

Carl Holm, Planning Manager
 Monterey County Planning Department
 168 Alisal Street, 2nd floor
 Salinas, California 93901

**RE: CITY OF MARINA COMMENTS ON THE MONTEREY COUNTY
 GENERAL PLAN DRAFT EIR**

Dear Mr. Holm,

On October 21, 2008, the City Council held a duly noticed public meeting to discuss and consider the Monterey County General Plan Draft Environmental Impact Report (Draft EIR) as it pertains to the City of Marina. At the meeting, the City Council adopted Resolution No. 2008-213 memorializing their response to the County. This letter forwards the City Council's comments.

1. County Draft General Plan, Conservation and Open Space Element

While the draft General Plan does include policy GMP-3.2 to limit the visual impact of new development on canyon edges and hilltops and while the County did add a policy to prohibit development on slopes greater than 30 percent, there is still no specific language to preserve hill tops and bluff tops as permanent open space that can be enjoyed by many future generations.

The City believes that the existing, un-developed hill tops and buff tops within the County, and in particular within the Greater Monterey Peninsula Area Plan, deserve to be protected and preserved. The City believes that any development at the top of these hills and bluffs is a significant impact and that the only acceptable mitigation is to prohibit their development. Such impact and mitigation should be addressed in the EIR.

2. County Draft General Plan and Draft EIR, Circulation Element, Intersection Level of Service

The County draft General Plan and Draft EIR continue to set a Level of Service D as the impact threshold for County intersections.

1

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The City believes that the County should set a minimum Level of Service C for major County intersections to limit impacts to local jurisdictions, since approximately 75 percent of the County's residents are located within city boundaries. A Level of Service C should be addressed in the EIR.

2

3. County Draft General Plan, Public Services Element, Fair Share of Impact Fees

The County has not added language to the draft General Plan to emphasize that new residential development located adjacent to the City of Marina should seek annexation to the City to relieve the impact on City services by paying their fair share of impact fees.

3

The City believes that new development within the County, but adjacent to local jurisdictions, will greatly impact those jurisdictions, because it is within the local jurisdiction that most of the public services are concentrated. For example, if a Marina fire station is the closest fire station to an emergency in adjacent County land, Marina will respond and likewise for police services. These types of public service impacts from new, adjacent development to local jurisdictions should be addressed in the EIR.

4. Draft EIR, Table 4.11-1, Sheriff's Station Summary

The Draft EIR includes a table that summarizes the service areas for the Central, Coastal, and South County regional stations. The City suggests listing the Royal Oaks area as a neighborhood that is also serviced by the Central sheriff's station.

4

5. Draft EIR, Page 4.11-16, Safety Element Policies

The City recommends revising the last paragraph to provide more detail regarding the types of resources needed in an emergency situation, as follows:

"As stated in Impact 1, Safety Element Policies S-6.1 through S-6.8 set forth emergency preparedness policies to ensure that the Sheriff's Office would have adequate resources to meet the demands of the 2030 population. Policies S-6.1 through S-6.8 would decrease impact on sheriff stations by ensuring that stations have the adequate resources in an emergency situation, which include emergency centers, resources, personnel, and equipment, information on the levels of emergency provided and prohibiting development in areas that cannot be reached by emergency vehicles."

5

October 27, 2008

RE: City of Marina Comments on the Monterey County General Plan Draft EIR

Page 3

6. Draft EIR, Page 4.11-17, Significance Determination

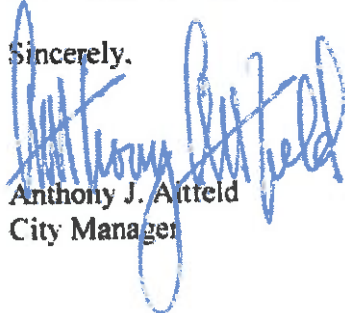
The City suggests strengthening the third to last paragraph to emphasize that there are currently unincorporated areas that are already underserved, as follows:

“There are no plans at the current time that describe the design, location, or operational characteristics of future facilities. Therefore, their environmental impacts cannot be determined with any certainty and are examined at only a general level of detail. New facilities and services would serve the Community Areas and Rural Centers (where demand is expected to be greatest) and likely would be located in those areas. Their impacts would be an indistinguishable part of the impacts of the community as a whole. These facilities are typically low-key. For example, traffic is generally insubstantial because it is spread throughout the day. Noise is similarly low because of the limited number of employees and because sirens are seldom, if ever used when vehicles leave the premises (unlike a fire station). **Regardless, these facilities must be geographically located in those unincorporated areas that historically have been underserved and have the highest concentration of population and crime.**”

6

In summary, the City of Marina appreciates the efforts by the County to address the concerns of our community as you move forward with your General Plan adoption. However, we believe that the above concerns are critical to Marina’s future. Thank you for the opportunity to comment.

Sincerely,


Anthony J. Aitfeld
City Manager



City of Salinas

OFFICE OF THE CITY MANAGER
200 Lincoln Avenue Salinas, California 93901

(831) 758-7201 Fax (831) 758-7368

January 8, 2009

Monterey County
Planning and Building
Inspection Administration

Carl Holm, Assistant Planning Director
County of Monterey RMA
Planning Department
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

RECEIVED

**SUBJECT: 2007 GENERAL PLAN AND DRAFT PROGRAM ENVIRONMENTAL
IMPACT REPORT**

Dear Mr. Holm:

The City of Salinas submits the following comments on the County of Monterey's 2007 General Plan and Draft Program Environmental Impact Report. Many of the City's comments have been previously submitted in response to the 2006, version of the General Plan Update. These concerns remain applicable where similar policies exist. Copies of the City's prior correspondence dated October 6, 2006 and September 25, 2007 are attached.

Land Use

Greater Salinas Area Plan Policies GS-1.1 through GS-1.12 identify multiple Special Treatment Areas (STAs) and Study Areas (SAs), including Butterfly Village, Spence/Potter/Encinal Road and Highway 68/Foster Road among others. These STAs and SAs are intended to establish standards to guide development at those locations. In some cases, this is accomplished quite effectively. For example, GS 1.4 stipulates that development would only be allowed under specific conditions, within the identified land use boundaries shown in the Area Plan. In other areas, discussed further below, the Greater Salinas Area Plan does not establish clear guidelines for orderly development or does so in a manner that is inconsistent with the Greater Salinas Area Memorandum of Understanding (GSA-MOU).

As you know, the Greater Salinas Area Memorandum of Understanding (GSA-MOU) was adopted at a historic joint session of the Monterey County Board of Supervisors and Salinas City Council on August 29, 2006.

Some of the key elements of the GSA-MOU (excerpted and paraphrased below) were:

- City growth to the North and East, except as provided in the agreement;
- County support for the City's Future Growth Area annexation proposal to LAFCO;

Carl Holm
 2007 Monterey County General Plan
 January 6, 2009

County support for the City's Fresh Express and Uni-Kool annexation proposals, subject to appropriate environmental review, and subject to appropriate agricultural conservation easements;

- Agricultural easements to the west and south;
- Consultation with the City in the planning process for any development in the Greater Salinas Planning Area;
- No development by County contiguous to the City limits if those proposals require either or both a General Plan amendment or a rezoning. Proposals requiring such changes shall be referred to the City for consideration and possible annexation;
- City and County support for regional transportation system (TAMC);
- County development of a County-wide Traffic Impact Fee within 18 months of the adoption of the County General Plan;
- City and County cooperation regarding the alignment of the future Westside Bypass which shall establish a development boundary for the City;
- Development in area west of Davis Road and east of the future Westside 'Bypass, excluding the Boronda Redevelopment Area, shall be limited to expansion of City's retail sales capacity and shall take place after annexation;
- City and County to work cooperatively to address impacts on the Reclamation Ditch Watershed Area, recognizing that a comprehensive financing program is needed. County to complete a nexus study and hearing process, within 36 months of adoption of the GSA-MOU [August 29, 2009].

Our review of the 2007 General Plan and Draft Program EIR has focused first and foremost on an analysis of consistency with the GSA-MOU. The City of Salinas is pleased to see that the Land Use Map for the Greater Salinas Area has been amended to restore an Agricultural land use designation to those lands previously considered in the prior versions of the Rancho San Juan Specific Plan (pre Butterfly Village). The exception being those existing developed commercial parcels adjacent Highway 101 at the northerly entrance to the City. As we have mentioned in our informal monthly City – County staff meetings, it would be appropriate to designate that area northeasterly of the City as a Special Study Area (SA) subject to specific planning requirements and its potential annexation into the City of Salinas.

The City maintains its advocacy of city-centered growth and was therefore, concerned to see an acknowledgement of the potential for the development of general commercial uses in the vicinity of the Salinas River and Highway 68.

The City appreciates the agricultural-tourism nature of *"The Farm,"* as addressed in Policy GS-

Carl Holm
 2007 Monterey County General Plan
 January 6, 2009

1.3, however, the addition of general commercial uses as contemplated by Policy GS-1.5, or any commercial uses other than row-crop agriculture along this agricultural, scenic corridor would not be appropriate.

The City of Salinas has been diligent in its adherence to maintaining a distinct urban boundary. Unfortunately, that distinction is often blurred by commercial ventures at important gateways into the City. Of particular note is the cluster of heavy commercial, storage and even a mobile home park at the northerly entrance to the City as viewed from US 101. We fear that similar conditions are evolving along Highway 68 just south of Salinas as a series of metal buildings, ostensibly "fruit stands" are being developed. The aforementioned Policy GS-1.5 affirms the City's concern in this regard.

The City also questions Policy GS-1.6 addressing the potential development of commercial uses on commercially designated parcels between Harrison Road and Highway 101 to the north of the City. It is the City's position that any commercial development along this city gateway should be limited to only the redevelopment of those properties containing existing development. Additional development is inherently in conflict with the idea of city-centered growth and in conflict with the spirit of the Greater Salinas Area Memorandum of Understanding. Absent further consultation with the City, any undeveloped properties between Harrison Road and Highway 101 should be designated and limited to agricultural farmland use.

If not limited to row crop production, as a gateway into the City of Salinas (if not annexed into the City of Salinas), at minimum the properties should be developed to a very high architectural standard.

Policy GS-1.11 establishing a study area for Espinosa Road suggests the intention of the introduction of industrial uses in this location. Consideration of a General Plan policy and the establishment of a Special Study Area would be not an appropriate solution to a code enforcement concern. The introduction of industrial uses in this location - in near proximity to the City of Salinas is in conflict with the principles of city-centered growth and again in conflict with the Greater Salinas Area Memorandum of Understanding.

The City of Salinas is also concerned regarding Policy GS-6.2 permitting the development of coolers, cold rooms, loading docks and farm equipment shops on agriculturally designated land. These are industrial activities and as such should be located in an appropriate industrially designated, city-centered location.

Circulation

The discussion regarding the public transportation services provided by Monterey-Salinas Transit fails to mention the service provided to South County.

The City is pleased to see that the Capital Improvement and Financing Plan (CIFP) are to be completed within the 18 month period established by the Greater Salinas Area Memorandum of Understanding (GSA-MOU). It is interesting that the County has determined that Level of

Carl Holm
 2007 Monterey County General Plan
 January 6, 2009

Service (LOS) D is being proposed as a County standard. LOS D is more typically an urban rather than rural standard. LOS D may be appropriate in designated Community Areas; however as an overall standard for the County, it may condone traffic congestion in rural locations where traffic problems are typically not anticipated. Regrettably, the electorate did not see the ultimate value in Measure Z (the 1/2 cent sales tax initiative to address region and local serving roads) which makes it all the more imperative that the County of Monterey along with other regional entities adopt timely transportation congestion/safety policies.

2

Conservation and Open Space

The City of Salinas questions Policy OS-1.1 encouraging the establishment *voluntary* restrictions to the development potential of property located in designated visually sensitive areas. Monterey County is visually stunning. Areas which are deemed to be visually sensitive should have development regulations and public review processes established to ensure that Policies OS-1.2 through OS-1.9 remain viable.

3

Regarding Policy OS-3.7 encouraging *the voluntary preparation of a coordinated resources management plan in watersheds of State designated impaired waterways*; the City of Salinas encourages the County of Monterey to require the preparation of stormwater management and control plans meeting the requirements as imposed on the City by the state Central Coast Regional Water Quality Control Board. This is particularly relevant to those properties within the Zone 9 watershed area as defined by the Monterey County Water Resources Agency.

Safety

Safety policy S-2.3 provides for an exemption to the guidelines established by FEMA and the National Flood Insurance Programs as well as ordinances enacted by the Monterey County Board of Supervisors for grading activities carried out in the course of routine agricultural operations. It has been the City of Salinas' experience that the greatest contributor to the siltation of the creeks and their tributaries flowing through the City is a result of upstream agricultural grading practices. The City of Salinas recommends an agricultural grading policy that would result in the detention/retention of storm and irrigation water on-site. Table PS-1 indicates that agricultural lands result in no net increase in harmful run-off. This statement is contrary to the herbicide and pesticide measurements that have been collected in the stream corridors flowing through the City as a result of upstream agricultural operations. Drainage and agricultural management and mitigation monitoring plans should be required for run-off into the regional watershed.

4

Agriculture

The 2007 General Plan update anticipates the conversion of approximately 2,571 acres of Important Farmland to non-agricultural uses. Although the Draft Environmental Impact Report (DEIR) states that no mitigation beyond the 2007 General Plan policies is feasible, the City was pleased to see the commitment to the preparation, adoption and implementation of a program to mitigate for the loss of that farmland in Policy AG-1.2. The City of Salinas recommends that the

5

Carl Holm
 2007 Monterey County General Plan
 January 6, 2009

County of Monterey consider the Agricultural Land Preservation Program established in consultation with the County of Monterey as a potential regional model [Resolution No. 19422 (NCS)] for the loss of important farmland.

5

Water Resource Management

The Water Resources section of the Draft Environmental Impact Report for the 2007 Monterey County General Plan update commendably addresses many of the hydrologic conditions throughout the County of Monterey. However, with the attention that the community has given Can Lake, and with the concerns expressed by the Monterey County Water Resources Agency, the City was surprised to note that Section 4.3 Water Resources did not address this significant natural stormwater management facility along with the accompanying 1907 Reclamation Ditch that was created to enable the cultivation of this watershed feature.

It is vital that the County implement Paragraph #13 of the GSA-MOU and work in good faith with the City and other interested parties to complete its comprehensive financing program for the Reclamation Ditch, including finalization of the nexus study and hearing process.

The City did note the reference to existing storm drain systems and the potential that they may be insufficient to accommodate future "Special Treatment Areas" outside of the city-limits. The properties within these "Special Treatment Areas" must be included in the solution to address the deficiencies identified by the Monterey County Water Resources Agency.

6

The Reclamation Ditch is a man made feature connecting the regions natural watercourses: Gabilan and Natividad Creeks and Alisal and Tembledero Sloughs. As these natural and man-made riparian and drainage features are improved the City of Salinas encourages the County to establish policies that would establish a recreation trail extending from the foothills of the Gabilan Mountains to the beach at Moss Landing for the benefit of all our respective residents.

The City of Salinas appreciates that the County of Monterey has had many challenges throughout its lengthy General Plan Update process. The City also acknowledges that the adoption of the GPU initiates the requirement to bring all of the County's land use, zoning and development policies into conformance with the General Plan. In this regard, the City of Salinas urges the County of Monterey to limit the permissive and conditionally permissive land uses and development that may be considered in Agriculturally designated lands which surround the cities of the Salinas Valley to maintain the distinct urban/rural boundaries that contribute so significantly to the beauty and bounty of this region.

Carl Holm
2007 Monterey County General Plan
January 6, 2009

The City is grateful for the progress that that been made and hopes that its comments assist in improving the document and ensuring that mitigation measures are consistent with the GSA-MOU.

Respectfully submitted,

CITY OF "SALINAS



ARTIE FIELDS
City Manager

Enclosures

Correspondence dated October 6, 2006 and September 25, 2007
Resolution No. 19422 establishing an Agricultural Land Preservation Program

cc: Mayor and Salinas City Council
Monterey County Board of Supervisors
City Attorney
Deputy City Manager / City Engineer



City of Salinas

OFFICE OF THE CITY MANAGER
200 Lincoln Avenue Salinas, California 93901

(831) 758-7201 Fax (831) 758-7368

September 25, 2007

BY HAND DELIVERY

Chairman Dave Potter
Vice-Chair Fernando Armenta and Members of the
Monterey County Board of Supervisors
168 West Alisal St., 1st Floor
Salinas, CA 93901

Re: City of Salinas Comments re Planning Commission Recommendations for GPU-5

Dear Chairman Potter and Members of the Board:

Please accept these comments on behalf of the City of Salinas concerning the recommendations by the Planning Commission and the Planning Commission Ad Hoc Subcommittee for GPU-5. The City commends the County's efforts to arrive at a comprehensive and credible compromise General Plan update document.

The City's primary considerations pertain to policies in support of City Centered Growth, and development in the Greater Salinas Area. The Greater Salinas Area Memorandum of Understanding (GSA-MOU), approved by the Monterey County Board of Supervisors and the Salinas City Council on August 29, 2006 (attached as Exhibit A) establishes a framework of guiding principles to ensure orderly and appropriate development for the Greater Salinas area.

7

This is consistent with our previous communications to the County, most recently in October 2006 (copy of letter attached as Exhibit B).

It is critical to the City of Salinas that GPU-5 be consistent with the GSA-MOU and that the GSA-MOU be distributed and reviewed as part of the regular planning and environmental review process for any project or development in the Greater Salinas Area of Monterey County. Specific comments pertaining to the Planning Commission recommendation are as follows:

- : Rancho San Juan: The City positively considers the deletion of Rancho San Juan/ Butterfly Village as a "Community Area" in GPU-5.
- : Development in the Greater Salinas Area: The City notes that under the GSA-MOU, the City and County agreed that "developments within the area designated by the County General Plan as the Greater Salinas Planning Area shall only occur after consultation with the City in the planning process." (GSA-MOU, Paragraph 6 (emphasis added))

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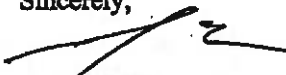
- : Community Areas generally: Community Area policies that establish designated areas for urban uses are not generally consistent with basic and widely accepted "smart growth" principles which are city-centered and take advantage of existing urban infrastructure, transit and public and emergency services. Any development within designated "Community Areas" (including redevelopment areas) should not proceed prior to the adoption of a Community Plan or Specific Plan. 10
- : Boronda: With respect to the designation of Boronda as a "Community Area", the City notes that any development in the undeveloped southern portion of the Boronda Redevelopment area must be consistent with Paragraph 14-15 of the GSA-MOU. 11
- : Affordable Housing Overlays: The City notes that under the GSA-MOU, the City and County agreed "to support each other's efforts to construct affordable housing throughout the County necessary to achieve the Fair Share Housing Allocation as approved by the Association of Monterey Bay Area Governments (AMBAG)." (GSA-MOU, Paragraph 16 (emphasis added)) The City commends the County's efforts to promote affordable housing throughout the County. 12
- : Traffic: In addition to the Planning Commission's recommendation that the Board require the adoption of a concept-level Capital Improvement Financing Plan (CIFP), the City notes that the GSA-MOU also requires the County "to develop a County-wide Traffic Impact fee program for the improvement of major County roads in accordance with the County's adopted General Plan." (GSA-MOU, Paragraph 10.) Also, please note our previous concerns with the traffic modeling assumptions prepared for the 2006 General Plan Draft Program Environmental Impact Report. 13
- : Annexations: The City and County have also agreed "to work cooperatively and expeditiously in annexation matters consistent with this agreement." (GSA-MOU, Paragraph 8.) 14

These comments are not intended to be exclusive and merely highlight some of the provisions of the GSA-MOU that have application to GPU-5.

The City is available and welcomes the opportunity meet and consult with County staff concerning any of these comments.

Thank you for your consideration.

Sincerely,



DAVE MORA
City Manager

Monterey County Board of Supervisors
September 25, 2007
Page 3

Enclosures:

Exhibit A -- City of Salinas Letter to Mike Novo dated October 6, 2006
Exhibit B -- GSA-MOU

cc: Mayor and City Council (without enclosures)
Vanessa Vallarta, City Attorney (w/ enclosures)
Robert C. Russell, PE, Deputy City Manager/City Engineer (w/o enclosures)
Jorge Rifa, Deputy City Manager (w/o enclosures)
Mike Novo, Monterey County Planning Department (w/ enclosures)
Wayne Tanda, Resource Management Agency (w/ enclosures)
Charles, McKee, County Counsel (w/ enclosures)

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

Preface

The negotiated terms of the Greater Salinas Area Memorandum of Understanding (MOU) will replace the previous Boronda Memorandum of Understanding between the City of Salinas and the County of Monterey and shall be adopted only after a joint public meeting of the Monterey County Board of Supervisors and the Salinas City Council. In the event of a successful challenge to any provision of this MOU by a third party, such provision shall be removed from the Greater Salinas Area MOU.

This Memorandum of Understanding (MOU), by and between the County of Monterey (County) and the City of Salinas (City), is to set forth certain agreements between the parties to express their intent to jointly pursue action to assure orderly and appropriate land use development in the area designated in the General Plan of Monterey County as the Greater Salinas Area Plan area and in the City of Salinas. Specific objectives to be achieved through the implementation of the land use and associated policies included in this MOU are the preservation of certain agriculture land, the provision of future growth areas, and the provision of adequate financing for the services and facilities of benefit to the residents of the Greater Salinas Area Plan area and the City. It is recognized that, with respect to some of the provisions set forth herein, numerous actions must be taken pursuant to State and local laws and regulations before such policies can be implemented. Such actions include, in some instances; the need to comply with the California Environmental Quality Act (CEQA), the need to hold public hearings and/or otherwise seek public input before reaching binding decisions, and the need to obtain approvals from other agencies such as the Local Agency Formation Commission (LAFCO). For all such provisions, this MOU shall be understood to constitute tentative policy commitments that can only become fully binding after all such legal prerequisites have been satisfied. Even so, both parties agree to make a good faith effort to follow and implement the provisions of this MOU subject to the foregoing. /

The City and County do hereby mutually agree to the following:

City Growth

1. City and County agree that the future growth direction of the City shall be to the north and east of the current City limits, except as otherwise provided for in this MOU.
2. County supports the City's 2005 Preliminary Sphere of Influence/Annexation Proposal to LAFCO to the north and east of the City's existing City Limits (Exhibit
3. County supports the City's 2005 Preliminary Sphere of Influence/Annexation Proposal to LAFCO to the south of the City's existing City Limits (Exhibit A) for the exclusive purpose of agricultural processing and processing capacity (Fresh Express). County further supports future City Sphere of Influence./ Annexation proposals to the

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

south of the City's existing City Limit for the exclusive purpose of agricultural processing and processing capacity (Unikool), subject to the establishment of appropriate agricultural conservation easements.

4. City and County agree to the creation and implementation of agricultural conservation easements in the unincorporated areas to the west and south of the City's Sphere of Influence insofar as the easements are consistent with the adopted General Plans of the two jurisdictions.
5. City and County agree to work cooperatively and in concert with the affected property owners to annex developed unincorporated areas (e.g. Bolsa Knolls) adjacent to or within the City's Sphere of Influence as shown in Exhibit A and to transfer existing County sanitation facilities (e.g. Boronda) upon future City annexation that support these areas subject to the property owners paying any required sanitation system connection fees established by MRWPCA. It is anticipated that an initial effort consistent with this annexation commitment shall be cooperation by all parties to consider and facilitate the proposed Chapin Rogge Road annexation application insofar as the annexation is consistent with the provisions of LAFCO.
6. City and County agree that developments within the City's 2005 Preliminary Sphere of Influence/Annexation Proposal shall only occur after annexation to the City and that the City shall consult with the County in the planning process. City and County also agree that the developments within the area designated by the County General Plan as the Greater Salinas Planning Area shall only occur after consultation with the City in the planning process.
7. City and County agree that the County shall not process any proposals for development in areas contiguous (immediately adjacent) to the City's City Limit /
 - if those proposals would require either or both a County General Plan amendment or a rezoning. Proposals for development requiring a General Plan amendment or a rezoning shall be referred to the City for consideration and possible annexation to the City.
8. City and County agree to work cooperatively and expeditiously in annexation matters consistent with this agreement
9. City and County agree to support fees and taxes needed to mitigate the collective impact of new and existing development on the regional transportation system to the extent that the fees and taxes reflect the overall financing program adopted by TAMC.
10. City and County agree that County will develop a County-wide Traffic Impact fee program for the improvement of major County roads in accordance with the County's adopted General Plan. The County fee program will be developed in consultation with TAMC and Monterey County cities. It is recognized that there

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

will be development within the City of Salinas related to the anticipated annexation of land to the north and east of the existing City Limits, and it is the desire of both jurisdictions that the County not rely upon the imposition of an ad hoc traffic fee on City development. Therefore the development of the Traffic Impact Fee for the Salinas Area, as shown in Exhibit R, will be a priority and a nexus study and hearing process should be completed within 18 months of adoption of the 2006 County General Plan. The County Traffic Impact Fee will be imposed on development in affected cities and unincorporated areas.

11. City and County agree to work cooperatively on establishing the alignment, phasing and financing of the regional roadway facility commonly referred to as the Westside Bypass and will expedite the completion of a Project Study Report for this future roadway. City and County agree that the ultimate alignment of the future Westside Bypass shall establish the development boundary for the City. It is the intent of both parties to minimize the impact on agricultural land in establishing the Westside Bypass alignment so that the ultimate alignment shall not result in the development of acres of agricultural land in excess of that anticipated in the Westside Bypass alignment as shown in the City of Salinas 2002 adopted General Plan (Exhibit C).
12. City and County agree that future development between the area west of Davis Road and east of the future Westside Bypass, excluding the Boronda Redevelopment Project area, shall be limited to expansion of the City's retail sales capacity and shall take place after annexation.
13. City and County agree to work cooperatively to address the collective impact of current and anticipated land uses in the Reclamation Ditch Watershed Area. There is a recognition that a comprehensive financing program is needed that includes grants, benefit assessments, appropriate development impact fees, and special uses required to address current and anticipated impacts. The County, in consultation with the City, should complete a nexus study and hearing process, assessing benefit of current and existing land uses, within 36 months of adoption of this MOU. The adopted impact fee will be imposed on current and existing land uses in both the City and unincorporated areas.

Boronda Redevelopment Project Area

14. City and County agree that in the undeveloped southern portion of the Boronda Redevelopment Project Area (Exhibit D) the County shall take the lead in the planning, review, and approval process subject to concurrent City review so that the final approved project is consistent with existing City development standards. City recognizes the County's desire and intent to assure development that is consistent with commitments made to the Boronda community regarding required amendments to the current adopted Boronda Community Plan and that the anticipated development is assumed to provide financial benefit (i.e. tax increment) to the Boronda Development Area. City and County will work

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

cooperatively to assure that those commitments will result from and through the final approvals for development and annexation to the City of Salinas. City and County further agree that there will be no final development approvals prior to the completion of all requirements (including final LAFCO approval) for annexation of the subject area to the City of Salinas.

City and County agree that infill development in the northern portion of the Boronda Redevelopment Project Area (Exhibit D) Will continue to be processed by the County subject to consultation with the City.

- 15. City and County agree that property tax generated within the Boronda Redevelopment Area shall continue to accrue to the Boronda Redevelopment Area for implementation of the current (January 1, 2006) adopted Redevelopment Area Plan. Upon completion of the aforementioned Plan, the former Redevelopment Property Tax increment shall be allocated between the City and the County on a 50/50 basis.

Affordable Housing

- 16. City and County agree to support each other's efforts to construct affordable housing throughout the County necessary to achieve the Fair Share Housing Allocation as approved by the Association of Monterey Bay Area Government (AMBAG).
- 17. City and County agree that if the 100% affordable housing project on Rogge Road approved by the County in 2006 is annexed to the City that the project shall be credited to the County's Fair Share Housing Allocation.

Other

- 18. City and County mutually agree that neither will pursue future development related litigation against the other insofar as the subject development is consistent with this agreement.

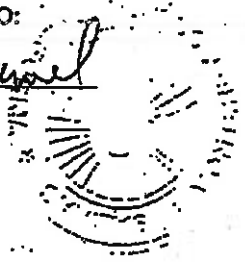
<p>CITY OF SALINAS A municipal corporation of the State of California</p> <p>By: _____ Anna Caballero, Mayor</p> <p>Dated: 9/20/2006 _____</p>	<p>COUNTY OF MONTEREY A political subdivision of the State of California</p> <p>By: _____ Jerry Smith Chairman of the Board of Supervisors</p> <p>Dated: 9/20/2006 <i>oZ** bG</i></p>
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GREATER SAUNAS AREA
MEMORANDUM OF UNDERSTANDING

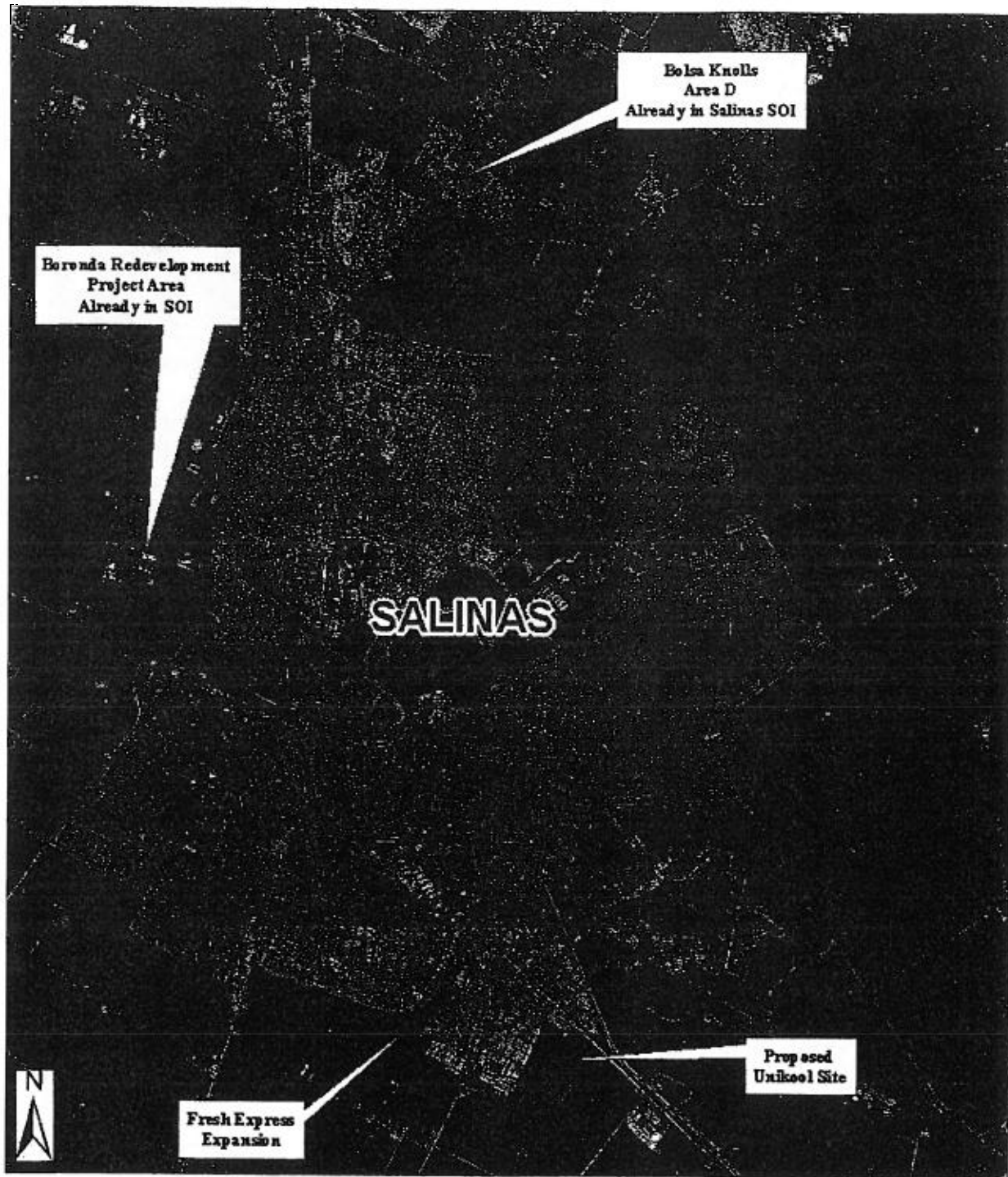
ATTESTED TO:

Amy Caspell
City Clerk



C. nimity Clerk





'EXHIBIT A

**Salinas 2005 Preliminary Sphere of Influence (SOI)
Annexation Proposal Map**



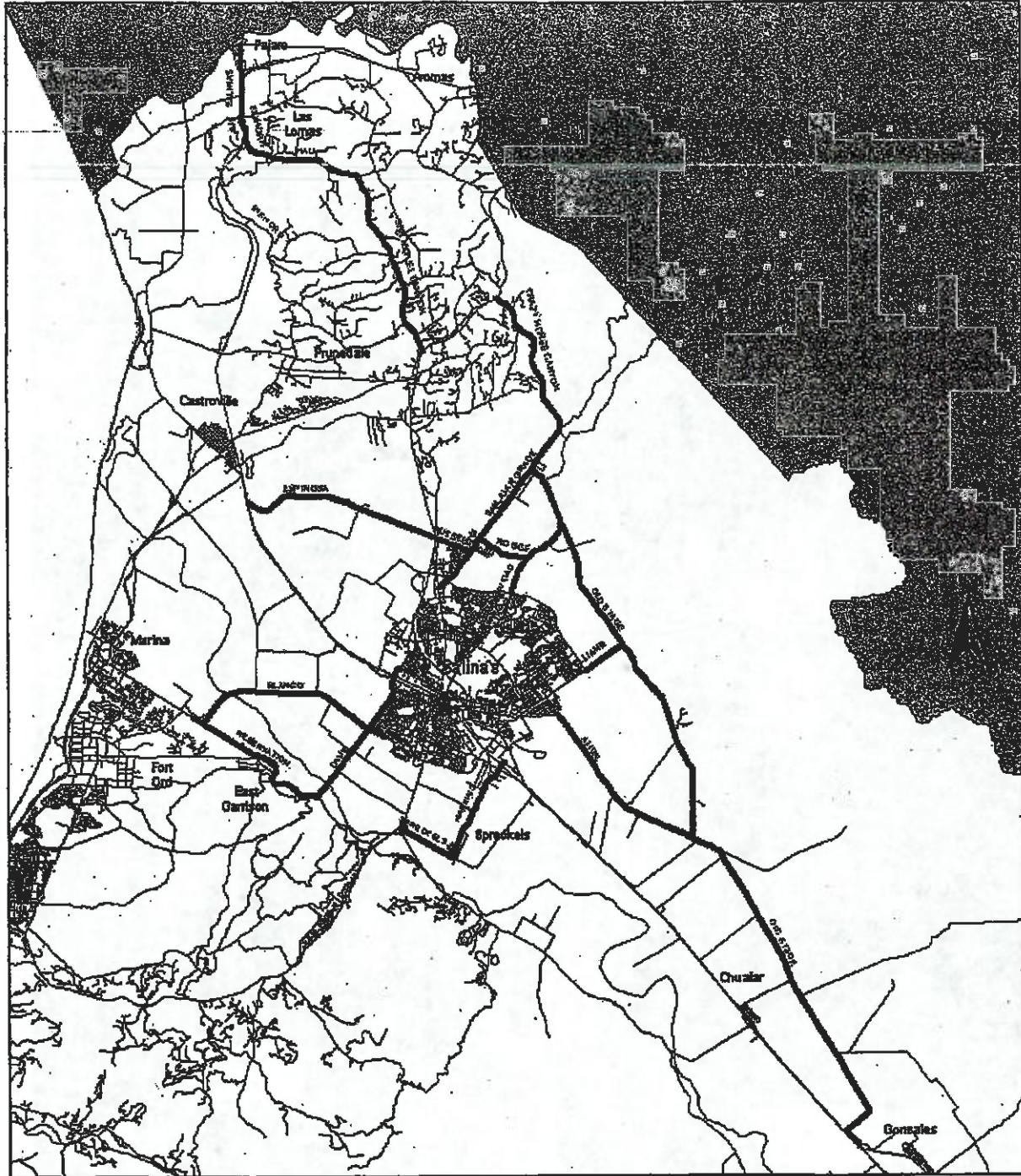


EXHIBIT B

Salinas Area Traffic Impact Fee
Affected Major County Roads



EXHIBIT C

Westside Bypass Alignment
City Salinas 2002 General Plan



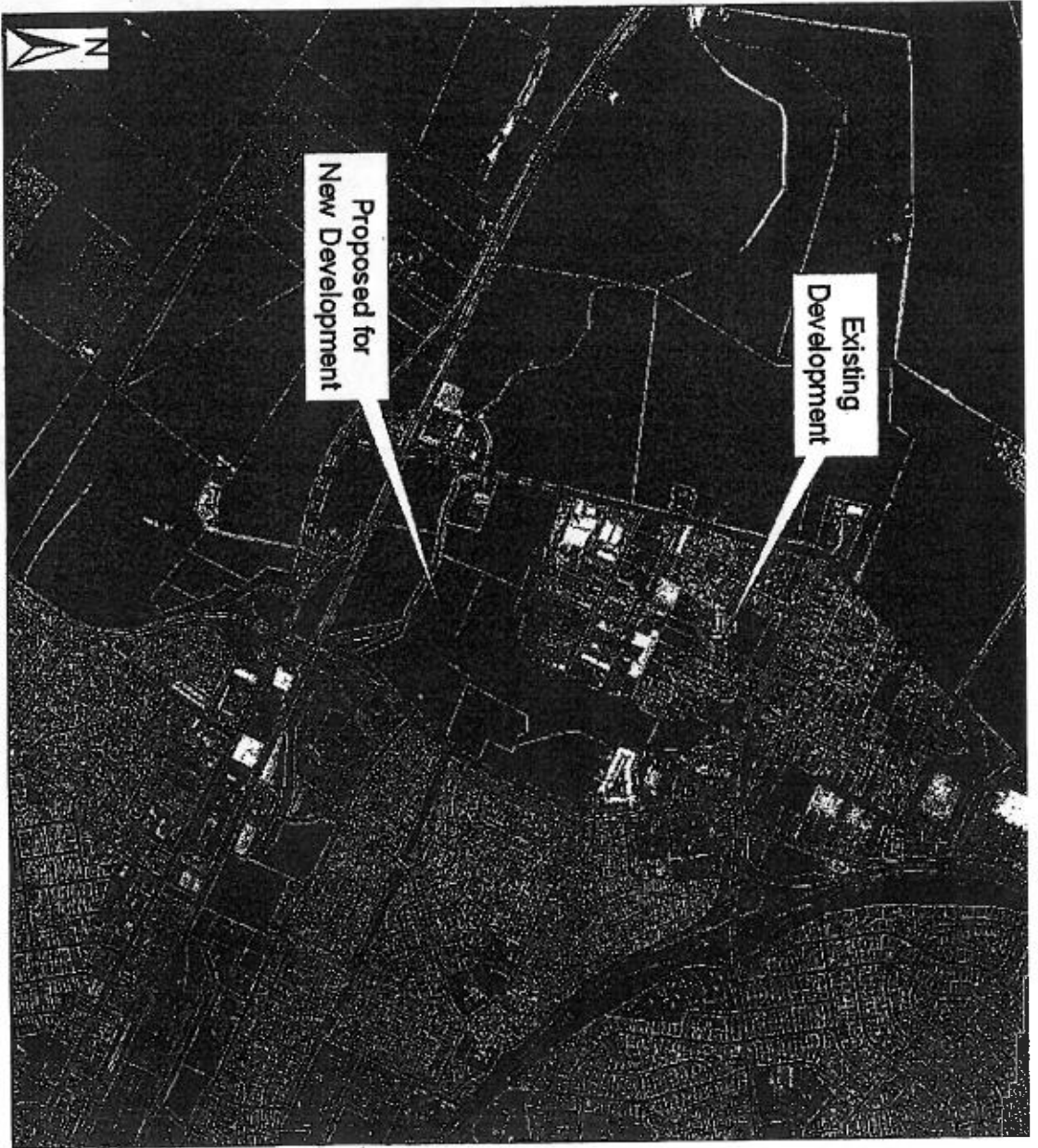


EXHIBIT D

**North Boroua Redevelopment Project Area
South Boroua Redevelopment Project Area**





City of Salinas

OFFICE OF THE CITY MANAGER
200 Lincoln Avenue Salinas, California 93901

(831) 758-7201 Fax (831) 758-7368

October 6, 2006

Mike Novo, Interim Planning Director
County of Monterey, Resource Management Agency
Planning Department
168 West Alisal Street, Second Floor
Salinas, CA 93901

SUBJECT: 2006 MONTEREY COUNTY GENERAL PLAN AND GENERAL PLAN EIR

Dear Mr. Novo:

The August 15, 2006 Monterey County staff presentation to the Salinas City Council was beneficial and assisted the City Council to identify areas of importance to the City of Salinas and its residents. The City's primary considerations pertain to policies in support of City Centered Growth and the Greater Salinas Area. It is acknowledged that the Greater Salinas Area Memorandum of Understanding (GSA-MOU), approved by the Monterey County Board of Supervisors and the Salinas City Council on August 29, 2006 (copy attached) establishes a framework of guiding principles to ensure orderly and appropriate development for the Greater Salinas area.

The following comments provide an overview of the policy considerations that the City of Salinas would like the County of Monterey to address in the 2006 Monterey County General Plan (2006 GPU). In general, the City of Salinas expects the adopted County General Plan to be consistent with the GSA-MOU.

City Centered Growth

- Policies LU-2.1—LU-2.4 should cross reference City Centered Growth policies LU-2:15-2.19.
- Policy 2.15 does not acknowledge the sovereignty of local jurisdictions and reads as if it was a policy for other jurisdictions to implement. As such, an appropriate revision to this policy would be *encourage* rather than emphasize redevelopment and infill. Development proposals that are contiguous to current or planned city limits • should be directed to the respective city for annexation and development.
- Policy LU-2.17a. should be expanded to direct, to the greatest extent possible, development to the existing incorporated cities within the Salinas Valley *in accordance with the jurisdiction's adopted General Plan*.
- Policy LU-2.17b. is overly broad. Establishing a "demonstrable benefit to the residents of the County as a whole" is quite vague and bears no relationship to the findings that LAFCO must establish for the determination of a jurisdiction's sphere of influence. The

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EXHIBI

Mike Novo
 October 6, 2006
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City recommends that this policy be deleted.

- Policy LU-2.18, *"The County shall critically review development proposals and general plan amendments within cities to assure that the impacts of growth in cities on the County's infrastructure are adequately quantified and fully mitigated"* is expressed in an overbearing manner and does not reflect the spirit of cooperation embodied in the GSAMOU. It is recommended that this policy be either deleted or restated to indicate that the County will coordinate with cities to cooperatively evaluate development proposals both in the County and within the cities to discuss issues of mutual concern, and to mitigate, when feasible, impacts on infrastructure.
- Community Area Policies LU-2.20-2.27 establishing designated areas for urban uses is contrary to the fundamental principle of City Centered Growth.
- Policy LU-2.25 should be revised to prohibit development within designated Community Areas (including redevelopment areas) prior to the adoption of a Community Plan or Specific Plan.
- Agricultural Policies AG-2.1 and AG-23 prohibit the development of agricultural support and processing facilities in the unincorporated area on lands designated as Farmland, Permanent Grazing and Rural Grazing. These policies are contrary to City Centered Growth. These policies allow for the conversion of prime agricultural lands into industrial business parks. Agricultural support and processing facilities are a critical component of the regional economy, however, these industrial facilities are most appropriately located in the incorporated cities where infrastructure has been developed and where the workforce resides.

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Circulation

The discussion regarding public transit services should be expanded to address MST's service to South County.

- Policy C-1.1 implies that Levels of Service (LOS) may be reduced through a Community Plan. This policy should be reconsidered. If LOS cannot be maintained at the appropriate standard, the approving authority may make findings of overriding consideration in conjunction with its consideration of the environmental impact report for the Community Plan.

Policy C-1.8 is similar to Policy LU-2.18 discussed above. The City recommends that the policy be revised to indicate that the County will coordinate with cities to cooperatively evaluate development proposals both in the County and within the cities to discuss issues of mutual concern and to mitigate, when feasible, impacts on the circulation system.

Mike Novo
October 6, 2006
Page 3 of 6

- Policy C-4.3 implies that agricultural uses take precedence over all other uses – the development of an efficient circulation system is a benefit for all including agricultural users. All public rights of way should include appropriate provisions for drainage and utilities; however, agricultural drainage should not be a part of the public infrastructure.
- Policies C-5.1-C-5.6 support scenic roads and highways. As such, all of the County's roads and highways should be considered scenic. Monterey County and its incorporated cities rely on the quality of the landscape to support its principal economic activities: agriculture and tourism. This also supports Policy LU-1.12 that discourages off site advertising. The City of Salinas has prohibited the erection of new billboards and off premise advertising structures for many years and recommends that Monterey County also consider such a prohibition.
- Policy C-6.5 is recommended to include a reference to City Centered Growth as urban development allows for more viable transit options.

Conservation & Open Space

- Policy OS-1.1 encouraging voluntary restrictions to the development potential of property located in a visually sensitive area is meaningless. Development in visually sensitive areas should be linked to an implementation program or mitigation measure as appropriate.

Emergency Services

- Policy S-6.5 (mislabeled as Policy P-6.5) indicates service levels for urban (Community Areas), suburban (Rural Centers) and rural areas. The response time for urban areas is established as 8 minutes or less, 90% of the time. The County may wish to consider a more aggressive response time similar to the City of Salinas. The emergency response service level adopted in the City's General Plan is 6 minutes, 90% of the time.

Public Services

- Policy PS-3.2 -" in determining whether there is a long term sustainable water supply, credit may be given for a significant reduction in the historic water use on site. Up to 50% of the average annual water use of 10 of the previous 20 years may be conserved for the proposed development." The intent of this policy is unclear. As it reads, one is led to believe that the policy is intended to contravene the doctrine of correlative rights and reasonable use which gives an overlying property owner the right to the reasonable use of the basin supply. Establishing the "reasonable use" of the water basin is typically established by creating a water balance demonstrating that the new use will use no more water than the historic use. This policy seems to imply that the "reasonable use" for a *new* use is one-half that of the historic use on the property. This policy appears inequitable.

Mike Novo
 October 6, 2006
 Page 4 of 6

- Policy PS-4.5- "New development proposed in the service area if existing wastewater collection, treatment and disposal should seek service from those facilities whenever possible." The City recommends that this policy emphasize City Centered Growth and be strengthened to require annexation into a member agency's jurisdiction.

Agricultural

- The inconsistency of policies AG-2.1 and AG-2.3, that support the conversion of farmland and grazing lands to agricultural support and processing facilities with the fundamentals of City Centered Growth is discussed above. The use of farmlands and grazing lands should be limited to raising crops and grazing livestock. The addition of industrial uses in locations outside of incorporated jurisdictions exacerbates traffic conditions on rural roads not designed to accommodate significant movements of truck traffic. Further, these policies have the potential to create isolated work environments in locations bereft of appropriate urban services and housing to serve the workforce. Additionally, the conversion of farmlands and grazing lands to support industrial processing would result in the erosion of the scenic aspects of the open lands used for row crop production and livestock grazing to the detriment of the region's attractiveness as a tourist destination.

Economic Development

- Policies AG-2.1 and AG-2.3 policies conflict with Economic Development policy ED-2.3 which states: "Work with cities to place commercial and industrial development in the most appropriate locations."
- Policy ED-2.3 should reference and reinforce City Centered Growth.

Greater Salinas Area Plan Supplemental Policies

- **FIGURE #10 Land Use Plan Greater Salinas**
 This map and inserts continue to reflect urban land uses in the area formerly designated as Ranch San Juan with significant portions of the property designated for high density residential, industrial and commercial uses. The area is designated as a "Study Area," however the City recommends that the underlying land uses be designated as **Agricultural Farmlands** until the study is completed through either a Community Plan or Specific Plan in conjunction with the annexation into the City of Salinas.

Further, the City also recommends that the lands located northeasterly of the City's Future Growth Area (the generally triangularly shaped area formed by the extension of San Juan Grade road [both sides] and Old Stage Road as it extends to Crazy Horse Canyon Road be designated as a Study Area. Development within this area should be prohibited until the adoption of the required Community Plan or Specific Plan in conjunction with the annexation into the City of Salinas. The insert map entitled

Mike Novo
October 6, 2006
Page 5 of 6

Butterfly Village and Rancho San Juan should be revised to include only the approved Butterfly Village project reflecting the Board of Supervisor's action. The inclusion of balance of the *former* Rancho San Juan area in this detail is misleading as Rancho San Juan is now limited to only Butterfly Village.

The Greater Salinas Area Land Use Map should also acknowledge the City's Future - Growth Area initially adopted by the City in 1988. and affirmed with the City's adoption of its 2002 General Plan.

- Policy GS-1.1 discusses the requirement for a special study for the area located north of Russell Road between Harrison Road and San Juan Grade Road adjacent the 671-acre Butterfly Village (a.k.a. Revised Rancho San Juan Specific Plan). Included in the discussion is a list of affected participants — the City of Salinas must be included in this discussion as should opportunities for City Centered Growth.

In addition to the above referenced General Plan policies, the City of Salinas has a potentially significant concern with the traffic modeling assumptions prepared for the 2006 General Plan Draft Program Environmental Impact Report. The basis of this concern stems from the work recently conducted by Fehr & Peers Transportation Consultants to assess the transportation implications of the Salinas Future Growth Area proposal using the AMBAG Regional Traffic Demand Forecasting Model. Seemingly, this traffic model includes a number of assumptions regarding trip distribution that appear to be flawed. The "flaws" seem to undermine the validity of the "regional model." Fehr & Peers have indicated that the model may be able to be utilized, however, it will take a significant effort in time and resources to correct the problems. Given the controversial nature of transportation related concerns, the City of Salinas would urge the comment period for the Draft Environmental Impact Report be extended until the concerns with the AMBAG Regional Traffic Demand Forecasting Model can be resolved.

Mike Novo
October 6, 2006
Page 6 of 6

Thank you for presenting these concerns and considerations to the Planning Commission and Board of Supervisors.

Sincerely,

/s/

DAVE MORA
City Manager

Cc: Mayor and City Council
Vanessa Vallarta, City Attorney
Robert C. Russell, PE, Deputy City Manager/City Engineer
Jorge Rifa, Deputy City Manager



RESOLUTION NO. 19422 (N.C.S.)

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SALINAS
APPROVING THE AGRICULTURAL LAND PRESERVATION PROGRAM**

WHEREAS, the City of Salinas has adopted and implemented various policies and mitigation measures in its 2002 General Plan and General Plan Final Program EIR relating to the conversion of agricultural lands to urban uses;

WHEREAS, these policies and measures include cooperation and agreements with the County of Monterey to confirm the general growth direction of the City to the north and east, as memorialized in the 2006 Greater Salinas Area Memorandum of Understanding (GSA-MOU);

WHEREAS, these policies and measures adopted in the 2002 General Plan also include priority to redevelopment and infill projects, as well as City-Centered growth principles; right to farm notices to ensure respect for farming rights; and buffers between agricultural and non-agricultural uses, amongst other General Plan policies and City codes that support and preserve agricultural lands;

WHEREAS, the City in the 2002 General Plan and in the 2006 GSA-MOU expressed its commitment to the development of an agricultural land conservation easement program;

NOW THEREFORE, BE IT RESOLVED that the City Council of the City of Salinas wishes to clarify and state the basic elements of the City's Agricultural Land Preservation Program.

NOW THEREFORE, BE IT FURTHER RESOLVED that the Council approves adopts the attached Agricultural Land Preservation Program attached hereto and incorporated by reference.

PASSED AND ADOPTED this 8th day of April 2008, by the following vote:

AYES: Councilmembers Barnes, Barrera, Sanchez, Villegas, and Mayor Donohue

NOES : Councilmember Lutes

ABSENT: Councilmember De La Rosa



Dennis Donohue, Mayor

ATTEST:



Ann Camel, City Clerk

CITY OF SALINAS

AGRICULTURAL LAND PRESERVATION PROGRAM

The City adopted and accordingly commits to, the following mitigation measures in 2002 General Plan Final Program.EIR relating to the conversion of agricultural lands to urban uses:

Cooperation with the County

AG-1. The City will implement Implementation Program COS-9, which requires the City to continue to cooperate with the County of Monterey to implement the Boronda Memorandum of Understanding [Greater Salinas Area-MOU], which directs that City growth occur generally to the north and east away from the most productive farmland.

Priority to Redevelopment and Infill

AG-2. The City will implement Implementation Program LU-7, which requires the City to give priority to redevelopment and *infill* projects that reduce development pressure on agricultural lands. Establish an incentive program to promote these projects, such as priority permit processing and density bonuses for such developments.

Right to Farm Notices

AG-3. The City will implement the Implementation Program COS-11, which requires the City to be consistent with the County of Monterey's "Right-to-Farm" Ordinance, and the policies with respect to farming rights found in the 2007 County of Monterey Draft General Plan, revise the City's Zoning Ordinance to require the recordation of a Right-to-Farm Notice as a condition of discretionary permit approval for residential development within 1,000 feet of an established agricultural operation. The purpose of the Notice is to acknowledge that residents in the area may experience inconveniences and discomfort associated with the normal fanning and grazing activities, such as noise and dust. The Notice shall specifically state that a variety of activities may occur that may be incompatible with the proposed development and that an established agricultural operation in full compliance with applicable laws, shall not be considered a nuisance due to changes in the surrounding area. The Notice shall also state that a person's right to recover under a nuisance claim against those activities may be restricted.

Buffers between Agricultural and Non Agricultural Uses

AG-4. The City will implement Implementation Program COS-10, which requires the City to encourage the provision and maintenance of buffers, such as roadways, topographic features, and open space, to prevent incompatibilities between agricultural and non-agricultural land uses. A number of factors shall be used to determine the appropriate buffer, including type of agricultural use, topography, and pesticide and machinery use, among others.

City of Salinas
Agricultural-Land Preservation Program

Agricultural Land Conservation Easement Program

AG-5. The City will work with the County of Monterey, and other local jurisdictions, to create and implement an agricultural land conservation easement program including such measures as securing the dedication of easements or by paying a mitigation fee that could be used to purchase easements through a mitigation bank.

200 Greater Salinas Area Memorandum of Understanding (GSA-MGU)

#4. City and County agree to the creation and implementation of agricultural conservation easements in the unincorporated areas to the west and south of the City's Sphere of Influence insofar as the easements are consistent with the adopted General Plans of the two jurisdictions. (Emphasis added)

Program will include (in addition to AG1—AG5 noted above):

- Tax Sharing Agreement that confirms the growth-direction of the City and constrains severe fiscal penalties for growth that is not consistent with the City's established 2002 adopted General Plan and/or City-County policy (i.e., GSA-MOU).
- For development to the west and south of City, the City shall require the dedication of agricultural conservation easements to provide for the permanent protection of agricultural land. For example, the proposed Salinas Ag-Industrial Business Park (UniKool property) includes agricultural conservation easements that will be established prior to final approval by the City, consistent with GSA-MOU paragraph #3. All other GSA-MOU identified growth areas to the south and west of Highway 101, including the Fresh Express annexation project area, the Westside Bypass area as generally shown on Exhibit C to the GSA-MOU and development in the Boronda Redevelopment project area shall be subject to their own separate environmental review and appropriate mitigation measures.
- For development of lands within the GSA-MOU identified growth areas to the north and east of Highway 101, no agricultural mitigation easement shall be required and a mitigation fee of \$750 p/acre shall be assessed for agricultural lands currently designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as "Prime" or "of Statewide Importance."

City of Salinas
Agricultural Land Preservation Program

- For purposes of this program, "GSA-MOLT identified growth areas" means annexations or changes in organization in the following areas: the north and east of the City limits that existed in 2005 and that are referenced in Figure LU-1 of the 2002 City General Plan, as well as the other areas identified in the GSA-MOU, including but not limited to Balsa Knolls and the Salinas Future Growth Annexation and Sphere of Influence (SOI) Area, the Chapin Rogge Road property, areas within the boundary of the final alignment of the Westside Bypass, the proposed Fresh Express expansion and the proposed Unikool Site to the south of Highway 101, and the Boronda Redevelopment Project Area, all as shown on Exhibits A and C to the GSA-MOU. A copy of the GSA-MOU is attached to this Program as Exhibit A.
- Any agricultural mitigation fees assessed by the City pursuant to this Program may, in the City's sole discretion, be applied toward the following types of activities designed to preserve and promote agriculture in the Greater Salinas Area (list is not intended to be all inclusive):
 - University level agricultural research, e.g. scientific research for solving agriculture's needs (e.g., food safety).
 - Increased agricultural educational programs in local high schools and community colleges.
 - Programs for expanding markets for local agricultural products.
 - Promoting careers in agriculture (e.g., scholarships).
 - Contributions to non-profit associations dedicated to agricultural education, promotion or preservation.
 - Contributions to USDA and the University of California Cooperative Extension.

The City of Salinas Agricultural Land Preservation Program shall apply to all lands subject to the 2002 Salinas General Plan, and the GSA-MOU identified growth areas noted above.



City of Salinas

OFFICE OF THE CITY MANAGER
200 Lincoln Avenue Salinas, California 93901

(831) 758-7201 Fax (831) 758-7368

January 8, 2009

Monterey County
Planning and Building
Inspection Administration

Carl Holm, Assistant Planning Director
County of Monterey RMA
Planning Department
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

RECEIVED

**SUBJECT: 2007 GENERAL PLAN AND DRAFT PROGRAM ENVIRONMENTAL
IMPACT REPORT**

Dear Mr. Holm:

The City of Salinas submits the following comments on the County of Monterey's 2007 General Plan and Draft Program Environmental Impact Report. Many of the City's comments have been previously submitted in response to the 2006, version of the General Plan Update. These concerns remain applicable where similar policies exist. Copies of the City's prior correspondence dated October 6, 2006 and September 25, 2007 are attached.

Land Use

Greater Salinas Area Plan Policies GS-1.1 through GS-1.12 identify multiple Special Treatment Areas (STAs) and Study Areas (SAs), including Butterfly Village, Spence/Potter/Encinal Road and Highway 68/Foster Road among others. These STAs and SAs are intended to establish standards to guide development at those locations. In some cases, this is accomplished quite effectively. For example, GS 1.4 stipulates that development would only be allowed under specific conditions, within the identified land use boundaries shown in the Area Plan. In other areas, discussed further below, the Greater Salinas Area Plan does not establish clear guidelines for orderly development or does so in a manner that is inconsistent with the Greater Salinas Area Memorandum of Understanding (GSA-MOU).

As you know, the Greater Salinas Area Memorandum of Understanding (GSA-MOU) was adopted at a historic joint session of the Monterey County Board of Supervisors and Salinas City Council on August 29, 2006.

Some of the key elements of the GSA-MOU (excerpted and paraphrased below) were:

- City growth to the North and East, except as provided in the agreement;
- County support for the City's Future Growth Area annexation proposal to LAFCO;

Carl Holm
 2007 Monterey County General Plan
 January 6, 2009

County support for the City's Fresh Express and Uni-Kool annexation proposals, subject to appropriate environmental review, and subject to appropriate agricultural conservation easements;

- Agricultural easements to the west and south;
- Consultation with the City in the planning process for any development in the Greater Salinas Planning Area;
- No development by County contiguous to the City limits if those proposals require either or both a General Plan amendment or a rezoning. Proposals requiring such changes shall be referred to the City for consideration and possible annexation;
- City and County support for regional transportation system (TAMC);
- County development of a County-wide Traffic Impact Fee within 18 months of the adoption of the County General Plan;
- City and County cooperation regarding the alignment of the future Westside Bypass which shall establish a development boundary for the City;
- Development in area west of Davis Road and east of the future Westside 'Bypass, excluding the Boronda Redevelopment Area, shall be limited to expansion of City's retail sales capacity and shall take place after annexation;
- City and County to work cooperatively to address impacts on the Reclamation Ditch Watershed Area, recognizing that a comprehensive financing program is needed. County to complete a nexus study and hearing process, within 36 months of adoption of the GSA-MOU [August 29, 2009].

Our review of the 2007 General Plan and Draft Program EIR has focused first and foremost on an analysis of consistency with the GSA-MOU. The City of Salinas is pleased to see that the Land Use Map for the Greater Salinas Area has been amended to restore an Agricultural land use designation to those lands previously considered in the prior versions of the Rancho San Juan Specific Plan (pre Butterfly Village). The exception being those existing developed commercial parcels adjacent Highway 101 at the northerly entrance to the City. As we have mentioned in our informal monthly City – County staff meetings, it would be appropriate to designate that area northeasterly of the City as a Special Study Area (SA) subject to specific planning requirements and its potential annexation into the City of Salinas.

The City maintains its advocacy of city-centered growth and was therefore, concerned to see an acknowledgement of the potential for the development of general commercial uses in the vicinity of the Salinas River and Highway 68.

The City appreciates the agricultural-tourism nature of "*The Farm*," as addressed in Policy GS-

Carl Holm
 2007 Monterey County General Plan
 January 6, 2009

1.3, however, the addition of general commercial uses as contemplated by Policy GS-1.5, or any commercial uses other than row-crop agriculture along this agricultural, scenic corridor would not be appropriate.

The City of Salinas has been diligent in its adherence to maintaining a distinct urban boundary. Unfortunately, that distinction is often blurred by commercial ventures at important gateways into the City. Of particular note is the cluster of heavy commercial, storage and even a mobile home park at the northerly entrance to the City as viewed from US 101. We fear that similar conditions are evolving along Highway 68 just south of Salinas as a series of metal buildings, ostensibly "fruit stands" are being developed. The aforementioned Policy GS-1.5 affirms the City's concern in this regard.

The City also questions Policy GS-1.6 addressing the potential development of commercial uses on commercially designated parcels between Harrison Road and Highway 101 to the north of the City. It is the City's position that any commercial development along this city gateway should be limited to only the redevelopment of those properties containing existing development. Additional development is inherently in conflict with the idea of city-centered growth and in conflict with the spirit of the Greater Salinas Area Memorandum of Understanding. Absent further consultation with the City, any undeveloped properties between Harrison Road and Highway 101 should be designated and limited to agricultural farmland use.

If not limited to row crop production, as a gateway into the City of Salinas (if not annexed into the City of Salinas), at minimum the properties should be developed to a very high architectural standard.

Policy GS-1.11 establishing a study area for Espinosa Road suggests the intention of the introduction of industrial uses in this location. Consideration of a General Plan policy and the establishment of a Special Study Area would be not an appropriate solution to a code enforcement concern. The introduction of industrial uses in this location - in near proximity to the City of Salinas is in conflict with the principles of city-centered growth and again in conflict with the Greater Salinas Area Memorandum of Understanding.

The City of Salinas is also concerned regarding Policy GS-6.2 permitting the development of coolers, cold rooms, loading docks and farm equipment shops on agriculturally designated land. These are industrial activities and as such should be located in an appropriate industrially designated, city-centered location.

Circulation

The discussion regarding the public transportation services provided by Monterey-Salinas Transit fails to mention the service provided to South County.

The City is pleased to see that the Capital Improvement and Financing Plan (CIFP) are to be completed within the 18 month period established by the Greater Salinas Area Memorandum of Understanding (GSA-MOU). It is interesting that the County has determined that Level of

Carl Holm
2007 Monterey County General Plan
January 6, 2009

Service (LOS) D is being proposed as a County standard. LOS D is more typically an urban rather than rural standard. LOS D may be appropriate in designated Community Areas; however as an overall standard for the County, it may condone traffic congestion in rural locations where traffic problems are typically not anticipated. Regrettably, the electorate did not see the ultimate value in Measure Z (the 1/2 cent sales tax initiative to address region and local serving roads) which makes it all the more imperative that the County of Monterey along with other regional entities adopt timely transportation congestion/safety policies.

2

Conservation and Open Space

The City of Salinas questions Policy OS-1.1 encouraging the establishment *voluntary* restrictions to the development potential of property located in designated visually sensitive areas. Monterey County is visually stunning. Areas which are deemed to be visually sensitive should have development regulations and public review processes established to ensure that Policies OS-1.2 through OS-1.9 remain viable.

3

Regarding Policy OS-3.7 encouraging *the voluntary preparation of a coordinated resources management plan in watersheds of State designated impaired waterways*; the City of Salinas encourages the County of Monterey to require the preparation of stormwater management and control plans meeting the requirements as imposed on the City by the state Central Coast Regional Water Quality Control Board. This is particularly relevant to those properties within the Zone 9 watershed area as defined by the Monterey County Water Resources Agency.

Safety

Safety policy S-2.3 provides for an exemption to the guidelines established by FEMA and the National Flood Insurance Programs as well as ordinances enacted by the Monterey County Board of Supervisors for grading activities carried out in the course of routine agricultural operations. It has been the City of Salinas' experience that the greatest contributor to the siltation of the creeks and their tributaries flowing through the City is a result of upstream agricultural grading practices. The City of Salinas recommends an agricultural grading policy that would result in the detention/retention of storm and irrigation water on-site. Table PS-1 indicates that agricultural lands result in no net increase in harmful run-off. This statement is contrary to the herbicide and pesticide measurements that have been collected in the stream corridors flowing through the City as a result of upstream agricultural operations. Drainage and agricultural management and mitigation monitoring plans should be required for run-off into the regional watershed.

4

Agriculture

The 2007 General Plan update anticipates the conversion of approximately 2,571 acres of Important Farmland to non-agricultural uses. Although the Draft Environmental Impact Report (DEIR) states that no mitigation beyond the 2007 General Plan policies is feasible, the City was pleased to see the commitment to the preparation, adoption and implementation of a program to mitigate for the loss of that farmland in Policy AG-1.2. The City of Salinas recommends that the

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Carl Holm
 2007 Monterey County General Plan
 January 6, 2009

County of Monterey consider the Agricultural Land Preservation Program established in consultation with the County of Monterey as a potential regional model [Resolution No. 19422 (NCS)] for the loss of important farmland.

5

Water Resource Management

The Water Resources section of the Draft Environmental Impact Report for the 2007 Monterey County General Plan update commendably addresses many of the hydrologic conditions throughout the County of Monterey. However, with the attention that the community has given Can Lake, and with the concerns expressed by the Monterey County Water Resources Agency, the City was surprised to note that Section 4.3 Water Resources did not address this significant natural stormwater management facility along with the accompanying 1907 Reclamation Ditch that was created to enable the cultivation of this watershed feature.

It is vital that the County implement Paragraph #13 of the GSA-MOU and work in good faith with the City and other interested parties to complete its comprehensive financing program for the Reclamation Ditch, including finalization of the nexus study and hearing process.

The City did note the reference to existing storm drain systems and the potential that they may be insufficient to accommodate future "Special Treatment Areas" outside of the city-limits. The properties within these "Special Treatment Areas" must be included in the solution to address the deficiencies identified by the Monterey County Water Resources Agency.

6

The Reclamation Ditch is a man made feature connecting the regions natural watercourses: Gabilan and Natividad Creeks and Alisal and Tembledero Sloughs. As these natural and man-made riparian and drainage features are improved the City of Salinas encourages the County to establish policies that would establish a recreation trail extending from the foothills of the Gabilan Mountains to the beach at Moss Landing for the benefit of all our respective residents.

The City of Salinas appreciates that the County of Monterey has had many challenges throughout its lengthy General Plan Update process. The City also acknowledges that the adoption of the GPU initiates the requirement to bring all of the County's land use, zoning and development policies into conformance with the General Plan. In this regard, the City of Salinas urges the County of Monterey to limit the permissive and conditionally permissive land uses and development that may be considered in Agriculturally designated lands which surround the cities of the Salinas Valley to maintain the distinct urban/rural boundaries that contribute so significantly to the beauty and bounty of this region.

Carl Holm
2007 Monterey County General Plan
January 6, 2009

The City is grateful for the progress that that been made and hopes that its comments assist in improving the document and ensuring that mitigation measures are consistent with the GSA-MOU.

Respectfully submitted,

CITY OF "SALINAS



ARTIE FIELDS
City Manager

Enclosures

Correspondence dated October 6, 2006 and September 25, 2007
Resolution No. 19422 establishing an Agricultural Land Preservation Program

cc: Mayor and Salinas City Council
Monterey County Board of Supervisors
City Attorney
Deputy City Manager / City Engineer



City of Salinas

OFFICE OF THE CITY MANAGER
200 Lincoln Avenue Salinas, California 93901

(831) 758-7201 Fax (831) 758-7368

September 25, 2007

BY HAND DELIVERY

Chairman Dave Potter
Vice-Chair Fernando Armenta and Members of the
Monterey County Board of Supervisors
168 West Alisal St., 1st Floor
Salinas, CA 93901

Re: City of Salinas Comments re Planning Commission Recommendations for GPU-5

Dear Chairman Potter and Members of the Board:

Please accept these comments on behalf of the City of Salinas concerning the recommendations by the Planning Commission and the Planning Commission Ad Hoc Subcommittee for GPU-5. The City commends the County's efforts to arrive at a comprehensive and credible compromise General Plan update document.

The City's primary considerations pertain to policies in support of City Centered Growth, and development in the Greater Salinas Area. The Greater Salinas Area Memorandum of Understanding (GSA-MOU), approved by the Monterey County Board of Supervisors and the Salinas City Council on August 29, 2006 (attached as Exhibit A) establishes a framework of guiding principles to ensure orderly and appropriate development for the Greater Salinas area.

7

This is consistent with our previous communications to the County, most recently in October 2006 (copy of letter attached as Exhibit B).

It is critical to the City of Salinas that GPU-5 be consistent with the GSA-MOU and that the GSA-MOU be distributed and reviewed as part of the regular planning and environmental review process for any project or development in the Greater Salinas Area of Monterey County. Specific comments pertaining to the Planning Commission recommendation are as follows:

- : Rancho San Juan: The City positively considers the deletion of Rancho San Juan/ Butterfly Village as a "Community Area" in GPU-5.
- : Development in the Greater Salinas Area: The City notes that under the GSA-MOU, the City and County agreed that "developments within the area designated by the County General Plan as the Greater Salinas Planning Area shall only occur after consultation with the City in the planning process." (GSA-MOU, Paragraph 6 (emphasis added))

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Monterey County Board of Supervisors
 September 25, 2007
 Page 2

- Community Areas generally: Community Area policies that establish designated areas for urban uses are not generally consistent with basic and widely accepted "smart growth" principles which are city-centered and take advantage of existing urban infrastructure, transit and public and emergency services. Any development within designated "Community Areas" (including redevelopment areas) should not proceed prior to the adoption of a Community Plan or Specific Plan. 10
- Boronda: With respect to the designation of Boronda as a "Community Area", the City notes that any development in the undeveloped southern portion of the Boronda Redevelopment area must be consistent with Paragraph 14-15 of the GSA-MOU. 11
- Affordable Housing Overlays: The City notes that under the GSA-MOU, the City and County agreed "to support each other's efforts to construct affordable housing throughout the County necessary to achieve the Fair Share Housing Allocation as approved by the Association of Monterey Bay Area Governments (AMBAG)." (GSA-MOU, Paragraph 16 (emphasis added)) The City commends the County's efforts to promote affordable housing throughout the County. 12
- Traffic: In addition to the Planning Commission's recommendation that the Board require the adoption of a concept-level Capital Improvement Financing Plan (CIFP), the City notes that the GSA-MOU also requires the County "to develop a County-wide Traffic Impact fee program for the improvement of major County roads in accordance with the County's adopted General Plan." (GSA-MOU, Paragraph 10.) Also, please note our previous concerns with the traffic modeling assumptions prepared for the 2006 General Plan Draft Program Environmental Impact Report. 13
- Annexations: The City and County have also agreed "to work cooperatively and expeditiously in annexation matters consistent with this agreement." (GSA-MOU, Paragraph 8.) 14

These comments are not intended to be exclusive and merely highlight some of the provisions of the GSA-MOU that have application to GPU-5.

The City is available and welcomes the opportunity meet and consult with County staff concerning any of these comments.

Thank you for your consideration.

Sincerely,



DAVE MORA
 City Manager

Monterey County Board of Supervisors
September 25, 2007
Page 3

Enclosures:

Exhibit A -- City of Salinas Letter to Mike Novo dated October 6, 2006
Exhibit B -- GSA-MOU

cc: Mayor and City Council (without enclosures)
Vanessa Vallarta, City Attorney (w/ enclosures)
Robert C. Russell, PE, Deputy City Manager/City Engineer (w/o enclosures)
Jorge Rifa, Deputy City Manager (w/o enclosures)
Mike Novo, Monterey County Planning Department (w/ enclosures)
Wayne Tanda, Resource Management Agency (w/ enclosures)
Charles, McKee, County Counsel (w/ enclosures)

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

Preface

The negotiated terms of the Greater Salinas Area Memorandum of Understanding (MOU) will replace the previous Boronda Memorandum of Understanding between the City of Salinas and the County of Monterey and shall be adopted only after a joint public meeting of the Monterey County Board of Supervisors and the Salinas City Council. In the event of a successful challenge to any provision of this MOU by a third party, such provision shall be removed from the Greater Salinas Area MOU.

This Memorandum of Understanding (MOU), by and between the County of Monterey (County) and the City of Salinas (City), is to set forth certain agreements between the parties to express their intent to jointly pursue action to assure orderly and appropriate land use development in the area designated in the General Plan of Monterey County as the Greater Salinas Area Plan area and in the City of Salinas. Specific objectives to be achieved through the implementation of the land use and associated policies included in this MOU are the preservation of certain agriculture land, the provision of future growth areas, and the provision of adequate financing for the services and facilities of benefit to the residents of the Greater Salinas Area Plan area and the City. It is recognized that, with respect to some of the provisions set forth herein, numerous actions must be taken pursuant to State and local laws and regulations before such policies can be implemented. Such actions include, in some instances; the need to comply with the California Environmental Quality Act (CEQA), the need to hold public hearings and/or otherwise seek public input before reaching binding decisions, and the need to obtain approvals from other agencies such as the Local Agency Formation Commission (LAFCO). For all such provisions, this MOU shall be understood to constitute tentative policy commitments that can only become fully binding after all such legal prerequisites have been satisfied. Even so, both parties agree to make a good faith effort to follow and implement the provisions of this MOU subject to the foregoing.

The City and County do hereby mutually agree to the following:

City Growth

1. City and County agree that the future growth direction of the City shall be to the north and east of the current City limits, except as otherwise provided for in this MOU.
2. County supports the City's 2005 Preliminary Sphere of Influence/Annexation Proposal to LAFCO to the north and east of the City's existing City Limits Exhibit
3. County supports the City's 2005 Preliminary Sphere of Influence/Annexation Proposal to LAFCO to the south of the City's existing City Limits Exhibit A for the exclusive purpose of agricultural processing and processing capacity (Fresh Express). County further supports future City Sphere of Influence/Annexation proposals to the

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

south of the City's existing City Limit for the exclusive purpose of agricultural processing and processing capacity (Unikool), subject to the establishment of appropriate agricultural conservation easements.

4. City and County agree to the creation and implementation of agricultural conservation easements in the unincorporated areas to the west and south of the City's Sphere of Influence insofar as the easements are consistent with the adopted General Plans of the two jurisdictions.
5. City and County agree to work cooperatively and in concert with the affected property owners to annex developed unincorporated areas (e.g. Bolsa Knolls) adjacent to or within the City's Sphere of Influence as shown in Exhibit A and to transfer existing County sanitation facilities (e.g. Boronda) upon future City annexation that support these areas subject to the property owners paying any required sanitation system connection fees established by MRWPCA. It is anticipated that an initial effort consistent with this annexation commitment shall be cooperation by all parties to consider and facilitate the proposed Chapin Rogge Road annexation application insofar as the annexation is consistent with the provisions of LAFCO.
6. City and County agree that developments within the City's 2005 Preliminary Sphere of Influence/Annexation Proposal shall only occur after annexation to the City and that the City shall consult with the County in the planning process. City and County also agree that the developments within the area designated by the County General Plan as the Greater Salinas Planning Area shall only occur after consultation with the City in the planning process.
7. City and County agree that the County shall not process any proposals for development in areas contiguous (immediately adjacent) to the City's City Limit / it those proposals would require either or both a County General Plan amendment or a rezoning. Proposals for development requiring a General Plan amendment or a rezoning shall be referred to the City for consideration and possible annexation to the City.
8. City and County agree to work cooperatively and expeditiously in annexation matters consistent with this agreement
9. City and County agree to support fees and taxes needed to mitigate the collective impact of new and existing development on the regional transportation system to the extent that the fees and taxes reflect the overall financing program adopted by TAMC.
10. City and County agree that County will develop a County-wide Traffic Impact fee program for the improvement of major County roads in accordance with the County's adopted General Plan. The County fee program will be developed in consultation with TAMC and Monterey County cities. It is recognized that there

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

will be development within the City of Salinas related to the anticipated annexation of land to the north and east of the existing City Limits, and it is the desire of both jurisdictions that the County not rely upon the imposition of an ad hoc traffic fee on City development. Therefore the development of the Traffic Impact Fee for the Salinas Area, as shown in Exhibit R, will be a priority and a nexus study and hearing process should be completed within 18 months of adoption of the 2006 County General Plan. The County Traffic Impact Fee will be imposed on development in affected cities and unincorporated areas.

11. City and County agree to work cooperatively on establishing the alignment, phasing and financing of the regional roadway facility commonly referred to as the Westside Bypass and will expedite the completion of a Project Study Report for this future roadway. City and County agree that the ultimate alignment of the future Westside Bypass shall establish the development boundary for the City. It is the intent of both parties to minimize the impact on agricultural land in establishing the Westside Bypass alignment so that the ultimate alignment shall not result in the development of acres of agricultural land in excess of that anticipated in the Westside Bypass alignment as shown in the City of Salinas 2002 adopted General Plan (Exhibit C).
12. City and County agree that future development between the area west of Davis Road and east of the future Westside Bypass, excluding the Boronda Redevelopment Project area, shall be limited to expansion of the City' retail sales capacity and shall take place after annexation.
13. City and County agree to work cooperatively to address the collective impact of current and anticipated land uses in the Reclamation Ditch Watershed Area. There is a recognition that a comprehensive financing program is needed that includes grants, benefit assessments, appropriate development impact fees, and special usxes required w ttdiress current and anticipated impacts. The County, in consultation with the City, should complete a nexus study and hearing process, assessing benefit of current and existing land uses, within 36 months of adoption of this MOU. The adopted impact fee will be imposed on current and existing land uses in both the City and unincorporated areas.

Boronda Redevelopment Project Area

14. City and County agree that in the undeveloped southern portion of the Boronda Redevelopment Project Area (Exhibit D) the County shall take the lead in the planning, review, and approval process subject to concurrent City review so that the final approved project is consistent with existing City development standards. City recognizes the County's desire and intent to assure development that is consistent with commitments made to the Boronda community-regarding required amendments to the current adopted Boronda Community Plan and that the anticipated development is assumed to provide financial benefit-0.e. tax increment) to the Boronda Development Area. City and County will work

GREATER SALINAS AREA
MEMORANDUM OF UNDERSTANDING

cooperatively to assure that those commitments will result from and through the final approvals for development and annexation to the City of Salinas. City and County further agree that there will be no final development approvals prior to the completion of all requirements (including final LAFCO approval) for annexation of the subject area to the City of Salinas.

City and County agree that infill development in the northern portion of the Boronda Redevelopment Project Area (Exhibit D) Will continue to be processed by the County subject to consultation with the City.

- 15. City and County agree that property tax generated within the Boronda Redevelopment Area shall continue to accrue to the Boronda Redevelopment Area for implementation of the current (January 1, 2006) adopted Redevelopment Area Plan. Upon completion of the aforementioned Plan, the former Redevelopment Property Tax increment shall be allocated between the City and the County on a 50/50 basis.

Affordable Housing

- 16. City and County agree to support each other's efforts to construct affordable housing throughout the County necessary to achieve the Fair Share Housing Allocation as approved by the Association of Monterey Bay Area Government (AMBAG).
- 17. City and County agree that if the 100% affordable housing project on Rogge Road approved by the County in 2006 is annexed to the City that the project shall be credited to the County's Fair Share Housing Allocation.

Other

- 18. City and County mutually agree that neither will pursue future development related litigation against the other insofar as the subject development is consistent with this agreement.

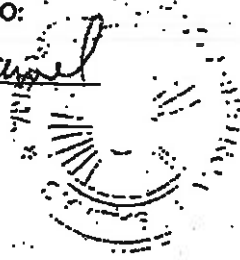
<p>CITY OF SALINAS A municipal corporation of the State of California</p> <p>By: _____ Anna Caballero, Mayor</p> <p>Dated: 2/20/06 _____</p>	<p>COUNTY OF MONTEREY A political subdivision of the State of California</p> <p>By: _____ Jerry Smith Chairman of the Board of Supervisors</p> <p>Dated: 2/20/06 _____</p>
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GREATER SAUNAS AREA
MEMORANDUM OF UNDERSTANDING

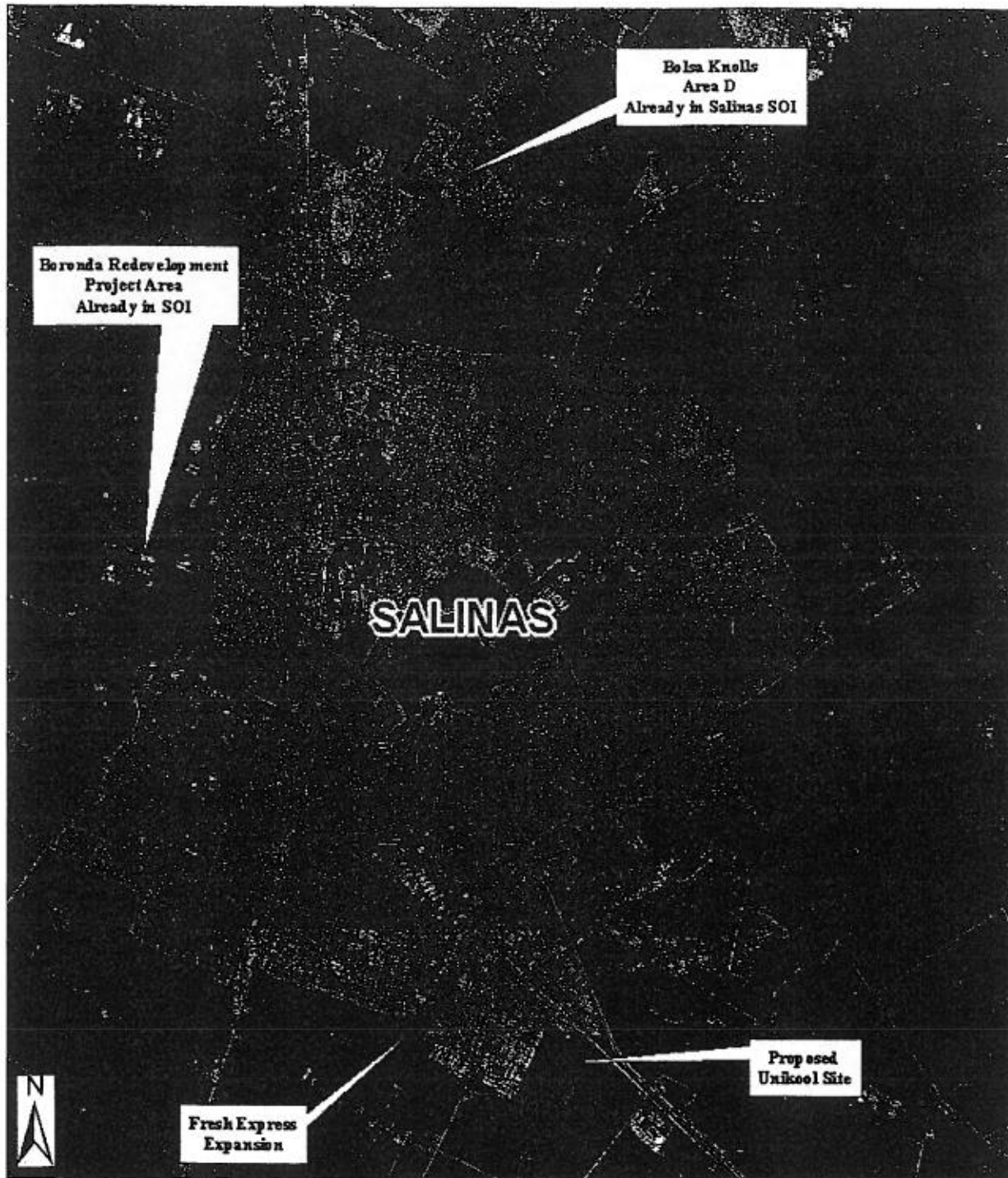
ATTESTED TO:

Ann Campbell
City Clerk



City Clerk





'EXHIBIT A

**Salinas 2005 Preliminary Sphere of Influence (SOI)
Annexation Proposal Map**



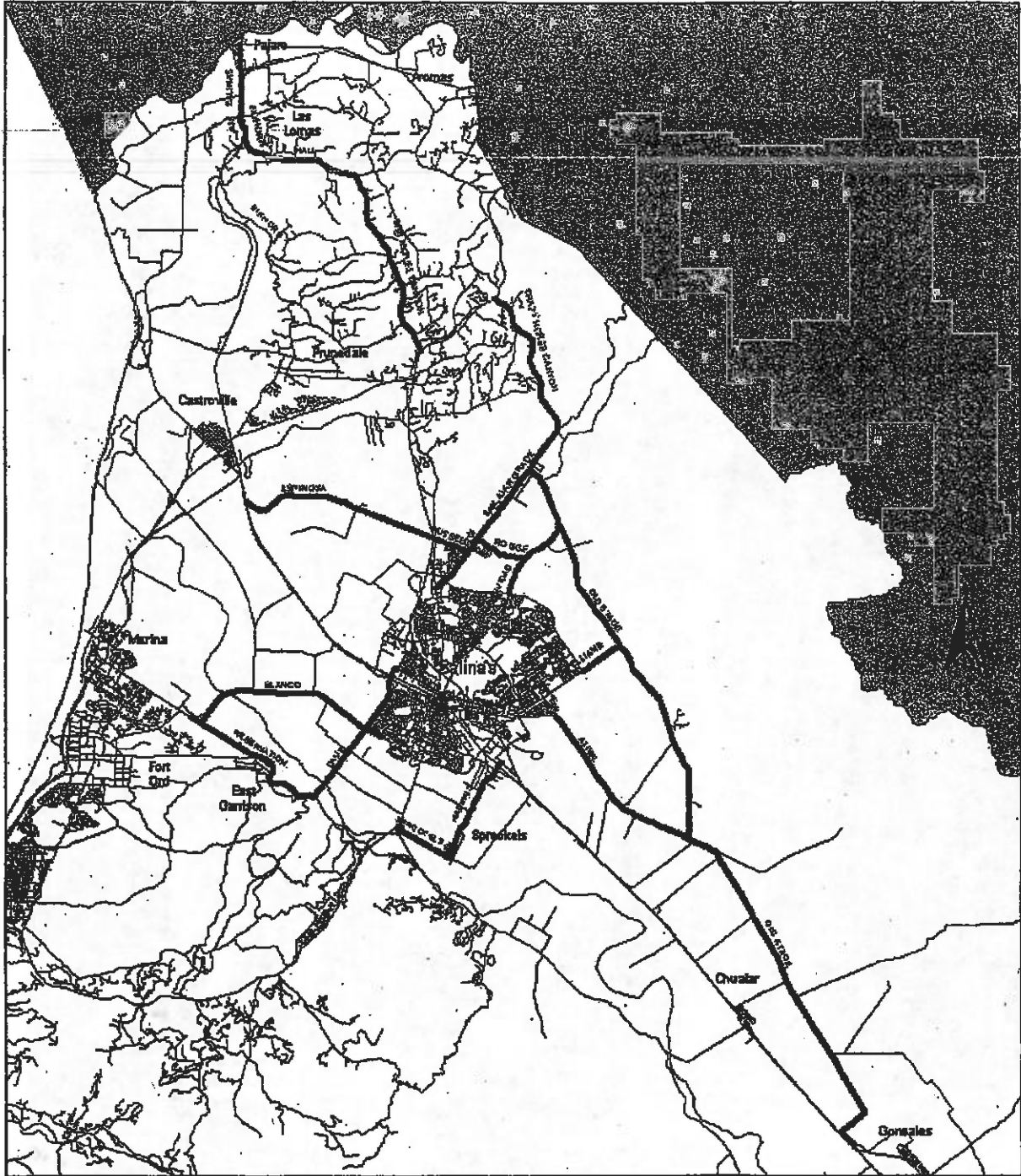


EXHIBIT B

Salinas Area Traffic Impact Fee
Affected Major County Roads

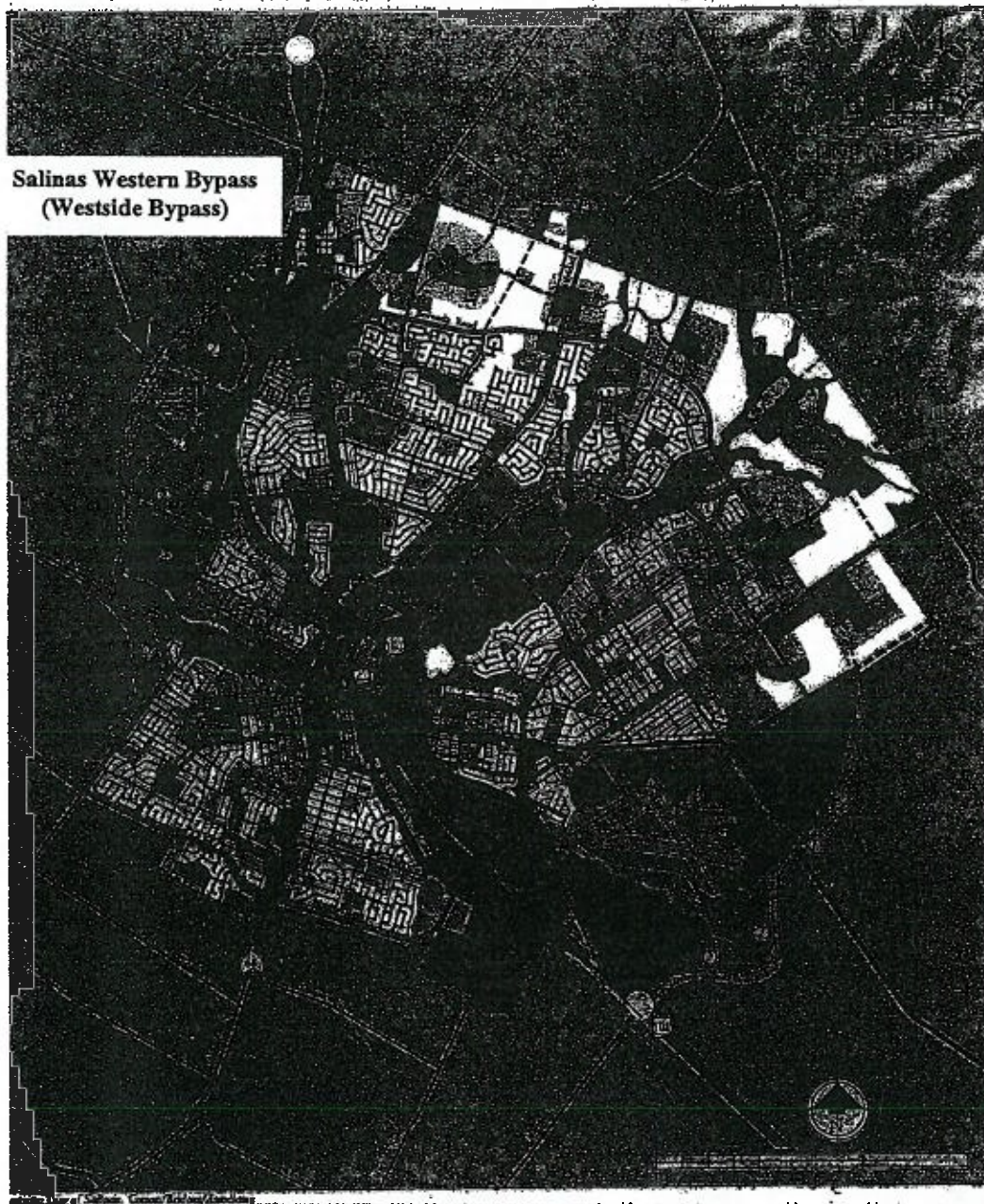


EXHIBIT C

Westside Bypass Alignment
City Salinas 2002 General Plan



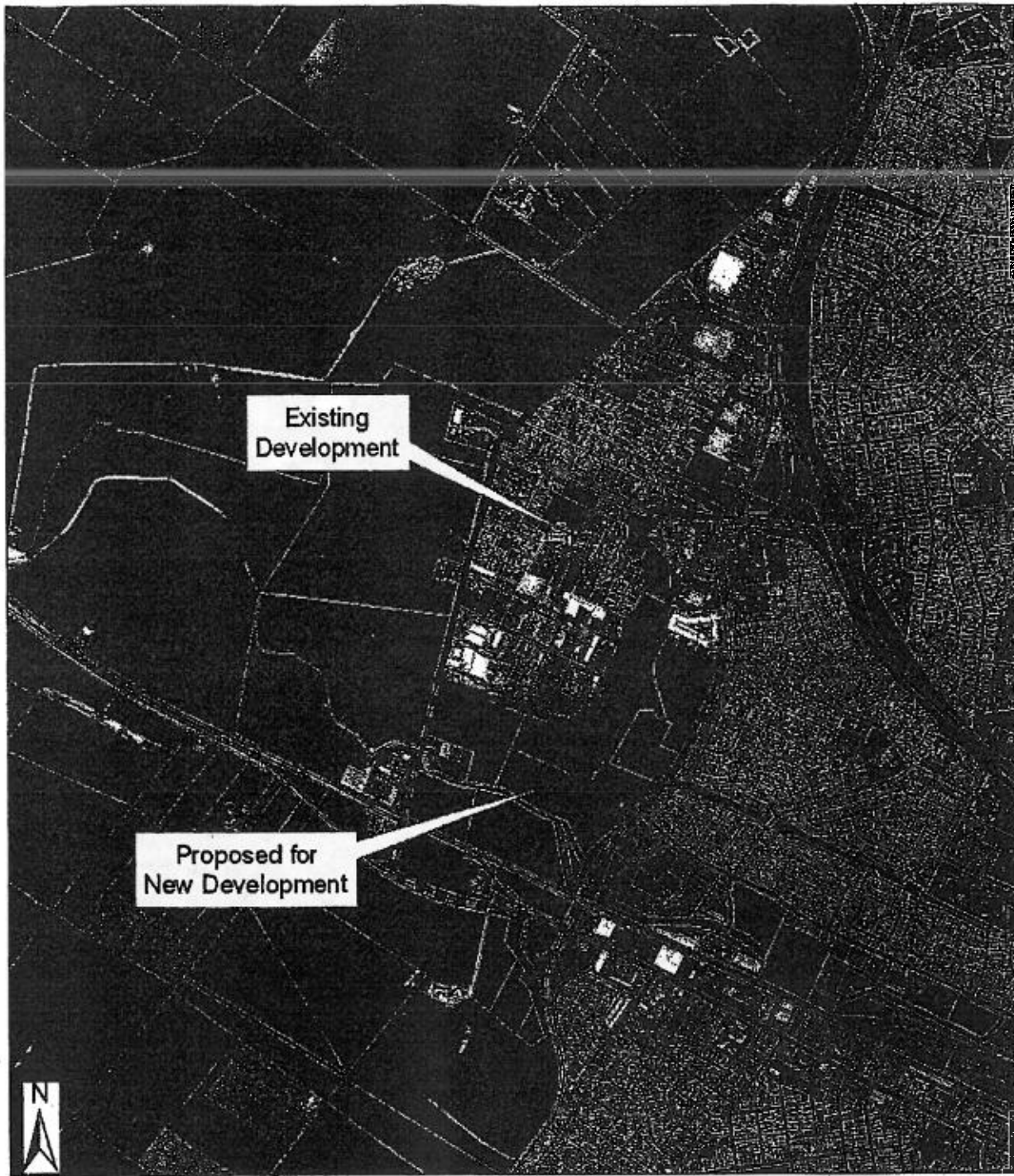


EXHIBIT D

**North Boronda Redevelopment Project Area
South Boronda Redevelopment Project Area**





City of Salinas

OFFICE OF THE CITY MANAGER
200 Lincoln Avenue Salinas, California 93901

(831) 758-7201 Fax (831) 758-7368

October 6, 2006

Mike Novo, Interim Planning Director
County of Monterey, Resource Management Agency
Planning Department
168 West Alisal Street, Second Floor
Salinas, CA 93901

SUBJECT: 2006 MONTEREY COUNTY GENERAL PLAN AND GENERAL PLAN EIR

Dear Mr. Novo:

The August 15, 2006 Monterey County staff presentation to the Salinas City Council was beneficial and assisted the City Council to identify areas of importance to the City of Salinas and its residents. The City's primary considerations pertain to policies in support of City Centered Growth and the Greater Salinas Area. It is acknowledged that the Greater Salinas Area Memorandum of Understanding (GSA-MOU), approved by the Monterey County Board of Supervisors and the Salinas City Council on August 29, 2006 (copy attached) establishes a framework of guiding principles to ensure orderly and appropriate development for the Greater Salinas area.

The following comments provide an overview of the policy considerations that the City of Salinas would like the County of Monterey to address in the 2006 Monterey County General Plan (2006 GPU). In general, the City of Salinas expects the adopted County General Plan to be consistent with the GSA-MOU.

City Centered Growth

- Policies LU-2.1—LU-2.4 should cross reference City Centered Growth policies LU-2:15-2.19.
- Policy 2.15 does not acknowledge the sovereignty of local jurisdictions and reads as if it was a policy for other jurisdictions to implement. As such, an appropriate revision to this policy would be *encourage* rather than emphasize redevelopment and infill. Development proposals that are contiguous to current or planned city limits • should be directed to the respective city for annexation and development.
- Policy LU-2.17a. should be expanded to direct, to the greatest extent possible, development to the existing incorporated cities within the Salinas Valley *in accordance with the jurisdiction's adopted General Plan*.
- Policy LU-2.17b. is overly broad. Establishing a "demonstrable benefit to the residents of the County as a whole" is quite vague and bears no relationship to the findings that LAFCO must establish for the determination of a jurisdiction's sphere of influence. The

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EXHIBI

Mike Novo
 October 6, 2006
 Page 2 of 6

City recommends that this policy be deleted.

- Policy LU-2.18, *"The County shall critically review development proposals and general plan amendments within cities to assure that the impacts of growth in cities on the County's infrastructure are adequately quantified and fully mitigated"* is expressed in an overbearing manner and does not reflect the spirit of cooperation embodied in the GSAMOU. It is recommended that this policy be either deleted or restated to indicate that the County will coordinate with cities to cooperatively evaluate development proposals both in the County and within the cities to discuss issues of mutual concern, and to mitigate, when feasible, impacts on infrastructure.
- Community Area Policies LU-2.20-2.27 establishing designated areas for urban uses is contrary to the fundamental principle of City Centered Growth.
- Policy LU-2.25 should be revised to prohibit development within designated Community Areas (including redevelopment areas) prior to the adoption of a Community Plan or Specific Plan.
- Agricultural Policies AG-2.1 and AG-23 prohibit the development of agricultural support and processing facilities in the unincorporated area on lands designated as Farmland, Permanent Grazing and Rural Grazing. These policies are contrary to City Centered Growth. These policies allow for the conversion of prime agricultural lands into industrial business parks. Agricultural support and processing facilities are a critical component of the regional economy, however, these industrial facilities are most appropriately located in the incorporated cities where infrastructure has been developed and where the workforce resides.

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Circulation

The discussion regarding public transit services should be expanded to address MST's service to South County.

- Policy C-1.1 implies that Levels of Service (LOS) may be reduced through a Community Plan. This policy should be reconsidered. If LOS cannot be maintained at the appropriate standard, the approving authority may make findings of overriding consideration in conjunction with its consideration of the environmental impact report for the Community Plan.

Policy C-1.8 is similar to Policy LU-2.18 discussed above. The City recommends that the policy be revised to indicate that the County will coordinate with cities to cooperatively evaluate development proposals both in the County and within the cities to discuss issues of mutual concern and to mitigate, when feasible, impacts on the circulation system.

Mike Novo
October 6, 2006
Page 3 of 6

- Policy C-4.3 implies that agricultural uses take precedence over all other uses – the development of an efficient circulation system is a benefit for all including agricultural users. All public rights of way should include appropriate provisions for drainage and utilities; however, agricultural drainage should not be a part of the public infrastructure.
- Policies C-5.1-C-5.6 support scenic roads and highways. As such, all of the County's roads and highways should be considered scenic. Monterey County and its incorporated cities rely on the quality of the landscape to support its principal economic activities: agriculture and tourism. This also supports Policy LU-1.12 that discourages off site advertising. The City of Salinas has prohibited the erection of new billboards and off premise advertising structures for many years and recommends that Monterey County also consider such a prohibition.
- Policy C-6.5 is recommended to include a reference to City Centered Growth as urban development allows for more viable transit options.

Conservation & Open Space

- Policy OS-1.1 encouraging voluntary restrictions to the development potential of property located in a visually sensitive area is meaningless. Development in visually sensitive areas should be linked to an implementation program or mitigation measure as appropriate.

Emergency Services

- Policy S-6.5 (mislabelled as Policy P-6.5) indicates service levels for urban (Community Areas), suburban (Rural Centers) and rural areas. The response time for urban areas is established as 8 minutes or less, 90% of the time. The County may wish to consider a more aggressive response time similar to the City of Salinas. The emergency response service level adopted in the City's General Plan is 6 minutes, 90% of the time.

Public Services

- Policy PS-3.2 -" in determining whether there is a long term sustainable water supply, credit may be given for a significant reduction in the historic water use on site. Up to 50% of the average annual water use of 10 of the previous 20 years may be conserved for the proposed development." The intent of this policy is unclear. As it reads, one is led to believe that the policy is intended to contravene the doctrine of correlative rights and reasonable use which gives an overlying property owner the right to the reasonable use of the basin supply. Establishing the "reasonable use" of the water basin is typically established by creating a water balance demonstrating that the new use will use no more water than the historic use. This policy seems to imply that the "reasonable use" for a new use is one-half that of the historic use on the property. This policy appears inequitable.

Mike Novo
 October 6, 2006
 Page 4 of 6

- Policy PS-4.5- "New development proposed in the service area if existing wastewater collection, treatment and disposal should seek service from those facilities whenever possible." The City recommends that this policy emphasize City Centered Growth and be strengthened to require annexation into a member agency's jurisdiction.

Agricultural

- The inconsistency of policies AG-2.1 and AG-2.3, that support the conversion of farmland and grazing lands to agricultural support and processing facilities with the fundamentals of City Centered Growth is discussed above. The use of farmlands and grazing lands should be limited to raising crops and grazing livestock. The addition of industrial uses in locations outside of incorporated jurisdictions exacerbates traffic conditions on rural roads not designed to accommodate significant movements of truck traffic. Further, these policies have the potential to create isolated work environments in locations bereft of appropriate urban services and housing to serve the workforce. Additionally, the conversion of farmlands and grazing lands to support industrial processing would result in the erosion of the scenic aspects of the open lands used for row crop production and livestock grazing to the detriment of the region's attractiveness as a tourist destination.

Economic Development

- Policies AG-2.1 and AG-2.3 policies conflict with Economic Development policy ED-2.3 which states: "Work with cities to place commercial and industrial development in the most appropriate locations."
- Policy ED-2.3 should reference and reinforce City Centered Growth.

Greater Salinas Area Plan Supplemental Policies

- **FIGURE #10 Land Use Plan Greater Salinas**
 This map and inserts continue to reflect urban land uses in the area formerly designated as Ranch San Juan with significant portions of the property designated for high density residential, industrial and commercial uses. The area is designated as a "Study Area," however the City recommends that the underlying land uses be designated as **Agricultural Farmlands** until the study is completed through either a Community Plan or Specific Plan in conjunction with the annexation into the City of Salinas.

Further, the City also recommends that the lands located northeasterly of the City's Future Growth Area (the generally triangularly shaped area formed by the extension of San Juan Grade road [both sides] and Old Stage Road as it extends to Crazy Horse Canyon Road be designated as a Study Area. Development within this area should be prohibited until the adoption of the required Community Plan or Specific Plan in conjunction with the annexation into the City of Salinas. The insert map entitled

Mike Novo
October 6, 2006
Page 5 of 6

Butterfly Village and Rancho San Juan should be revised to include only the approved Butterfly Village project reflecting the Board of Supervisor's action. The inclusion of balance of the *former* Rancho San Juan area in this detail is misleading as Rancho San Juan is now limited to only Butterfly Village.

The Greater Salinas Area Land Use Map should also acknowledge the City's Future - Growth Area initially adopted by the City in 1988, and affirmed with the City's adoption of its 2002 General Plan.

- Policy GS-1.1 discusses the requirement for a special study for the area located north of Russell Road between Harrison Road and San Juan Grade Road adjacent the 671-acre Butterfly Village (a.k.a. Revised Rancho San Juan Specific Plan). Included in the discussion is a list of affected participants — the City of Salinas must be included in this discussion as should opportunities for City Centered Growth.

In addition to the above referenced General Plan policies, the City of Salinas has a potentially significant concern with the traffic modeling assumptions prepared for the 2006 General Plan Draft Program Environmental Impact Report. The basis of this concern stems from the work recently conducted by Fehr & Peers Transportation Consultants to assess the transportation implications of the Salinas Future Growth Area proposal using the AMBAG Regional Traffic Demand Forecasting Model. Seemingly, this traffic model includes a number of assumptions regarding trip distribution that appear to be flawed. The "flaws" seem to undermine the validity of the "regional model." Fehr & Peers have indicated that the model may be able to be utilized, however, it will take a significant effort in time and resources to correct the problems. Given the controversial nature of transportation related concerns, the City of Salinas would urge the comment period for the Draft Environmental Impact Report be extended until the concerns with the AMBAG Regional Traffic Demand Forecasting Model can be resolved.

Mike Novo
October 6, 2006
Page 6 of 6

Thank you for presenting these concerns and considerations to the Planning Commission and Board of Supervisors.

Sincerely,

/s/

DAVE MORA
City Manager

Cc: Mayor and City Council
Vanessa Vallarta, City Attorney
Robert C. Russell, PE, Deputy City Manager/City Engineer
Jorge Rifa, Deputy City Manager



RESOLUTION NO. 19422 (N.C.S.)

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SALINAS
APPROVING THE AGRICULTURAL LAND PRESERVATION PROGRAM**

WHEREAS, the City of Salinas has adopted and implemented various policies and mitigation measures in its 2002 General Plan and General Plan Final Program EIR relating to the conversion of agricultural lands to urban uses;

WHEREAS, these policies and measures include cooperation and agreements with the County of Monterey to confirm the general growth direction of the City to the north and east, as memorialized in the 2006 Greater Salinas Area Memorandum of Understanding (GSA-MOU);

WHEREAS, these policies and measures adopted in the 2002 General Plan also include priority to redevelopment and infill projects, as well as City-Centered growth principles; right to farm notices to ensure respect for farming rights; and buffers between agricultural and non-agricultural uses, amongst other General Plan policies and City codes that support and preserve agricultural lands;

WHEREAS, the City in the 2002 General Plan and in the 2006 GSA-MOU expressed its commitment to the development of an agricultural land conservation easement program;

NOW THEREFORE, BE IT RESOLVED that the City Council of the City of Salinas wishes to clarify and state the basic elements of the City's Agricultural Land Preservation Program.

NOW THEREFORE, BE IT FURTHER RESOLVED that the Council approves adopts the attached Agricultural Land Preservation Program attached hereto and incorporated by reference.

PASSED AND ADOPTED this 8th day of April 2008, by the following vote:

AYES: Councilmembers Barnes, Barrera, Sanchez, Villegas, and Mayor Donohue

NOES : Councilmember Lutes

ABSENT: Councilmember De La Rosa



Dennis Donohue, Mayor

ATTEST:



Ann Camel, City Clerk

CITY OF SALINAS

AGRICULTURAL LAND PRESERVATION PROGRAM

The City adopted and accordingly commits to, the following mitigation measures in 2002 General Plan Final Program.EIR relating to the conversion of agricultural lands to urban uses:

Cooperation with the County

AG-1. The City will implement Implementation Program COS-9, which requires the City to continue to cooperate with the County of Monterey to implement the Boronda Memorandum of Understanding [Greater Salinas Area-MOU], which directs that City growth occur generally to the north and east away from the most productive farmland.

Priority to Redevelopment and Infill

AG-2. The City will implement Implementation Program LU-7, which requires the City to give priority to redevelopment and infill projects that reduce development pressure on agricultural lands. Establish an incentive program to promote these projects, such as priority permit processing and density bonuses for such developments.

Right to Farm Notices

AG-3. The City will implement the Implementation Program COS-11, which requires the City to be consistent with the County of Monterey's "Right-to-Farm" Ordinance, and the policies with respect to farming rights found in the 2007 County of Monterey Draft General Plan, revise the City's Zoning Ordinance to require the recordation of a Right-to-Farm Notice as a condition of discretionary permit approval for residential development within 1,000 feet of an established agricultural operation. The purpose of the Notice is to acknowledge that residents in the area may experience inconveniences and discomfort associated with the normal fanning and grazing activities, such as noise and dust. The Notice shall specifically state that a variety of activities may occur that may be incompatible with the proposed development and that an established agricultural operation in full compliance with applicable laws, shall not be considered a nuisance due to changes in the surrounding area. The Notice shall also state that a person's right to recover under a nuisance claim against those activities may be restricted.

Buffers between Agricultural and Non Agricultural Uses

AG-4. The City will implement Implementation Program COS-10, which requires the City to encourage the provision and maintenance of buffers, such as roadways, topographic features, and open space, to prevent incompatibilities between agricultural and non-agricultural land uses. A number of factors shall be used to determine the appropriate buffer, including type of agricultural use, topography, and pesticide and machinery use, among others.

City of Salinas
Agricultural-Land Preservation Program

Agricultural Land Conservation Easement Program

AG-5. The City will work with the County of Monterey, and other local jurisdictions, to create and implement an agricultural land conservation easement program including such measures as securing the dedication of easements or by paying a mitigation fee that could be used to purchase easements through a mitigation bank.

200 Greater Salinas Area Memorandum of Understanding (GSA-MGU)

#4. City and County agree to the creation and implementation of agricultural conservation easements in the unincorporated areas to the west and south of the City's Sphere of Influence insofar as the easements are consistent with the adopted General Plans of the two jurisdictions. (Emphasis added)

Program will include (in addition to AG1—AG5*noted above):

- Tax Sharing Agreement that confirms the growth-direction of the City and conra:ns severe fiscal penalties for growth that is not consistent with the City's established 2002 adopted General Plan and/or City-County policy (i.e., GSA-MOU).
- For development to the west and south of City, the City shall require the dedication of agricultural conservation easements to provide for the permanent protection of agricultural land. For example, the proposed Salinas Ag-Industrial Business Park (UniKool property) includes agricultural conservation easements that will be established prior to final approval by the City, consistent with GSA-MOU paragraph #3. All other GSA-MOU identified growth areas to the south and west of Highway 101, including the Fresh Express annexation project area, the Westside Bypass area as generally shown on Exhibit C to the GSA-MOU and development in the Boronda Redevelopment project area shall be subject to their own separate environmental review and appropriate mitigation measures.
- For development of lands within the GSA-MOU identified growth areas to the north and east of Highway 101, no agricultural mitigation easement shall be required and a mitigation fee of \$750 p/acre shall be assessed for agricultural lands currently designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as "Prime" or "of Statewide Importance."

City of Salinas
Agricultural Land Preservation Program

- For purposes of this program, "GSA-MOLT identified growth areas" means annexations or changes in organization in the following areas: the north and east of the City limits that existed in 2005 and that are referenced in Figure LU-1 of the 2002 City General Plan, as well as the other areas identified in the GSA-MOU, including but not limited to Balsa Knolls and the Salinas Future Growth Annexation and Sphere of Influence (SOI) Area, the Chapin Rogge Road property, areas within the boundary of the final alignment of the Westside Bypass, the proposed Fresh Express expansion and the proposed Unikool Site to the south of Highway 101, and the Boronda Redevelopment Project Area, all as shown on Exhibits A and C to the GSA-MOU. A copy of the GSA-MOU is attached to this Program as Exhibit A.
- Any agricultural mitigation fees assessed by the City pursuant to this Program may, in the City's sole discretion, be applied toward the following types of activities designed to preserve and promote agriculture in the Greater Salinas Area (list is not intended to be all inclusive):
 - University level agricultural research, e.g. scientific research for solving agriculture's needs (e.g., food safety).
 - Increased agricultural educational programs in local high schools and community colleges.
 - Programs for expanding markets for local agricultural products.
 - Promoting careers in agriculture (e.g., scholarships).
 - Contributions to non-profit associations dedicated to agricultural education, promotion or preservation.
 - Contributions to USDA and the University of California Cooperative Extension. .

The City of Salinas Agricultural Land Preservation Program shall apply to all lands subject to the 2002 ~~Salinas~~ General Plan, and the GSA-MOU identified growth areas noted above.

**RESOURCE MANAGEMENT SERVICES**440 Harcourt Avenue
Seaside, CA 93955Telephone (831) 899-6737
FAX (831) 899-6211
TDD (831) 899-6207

October 28, 2008

Monterey County
Attn: Carl Holm
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

RE: City of Seaside Comments on General Plan Update 5

Dear Mr. Holm:

The following comments provide an overview of the policy considerations that the City of Seaside believes should be considered by the County of Monterey in its review of the recirculation of the Environmental Impact Report for General Plan Update 5.

Water

Page 4.3-35: EIR references inter basin transfer of water for affordable housing overlay in the Seaside Basin. Under what authority would an inter basin transfer occur?

Page 4.3-91: All new projects should be required to retain all stormwater on-site per 100-year storm event.

Page 4.3-96&97: New development should be required to include on-site drainage system; same on-site drainage should apply to the Greater Monterey Peninsula

Page 4.3-115: What is footnote (4) referencing in Table 4.3-8.

Page 4.3-138: Reference to proposal by Cal-Am for the construction of injection wells should be noted and how much additional water would be diverted with the establishment of Cal-Am ASR wells.

Page 4.3-140: EIR should reference proposed development on Ft. Ord Master Plan and identify how existing infrastructure is adequate to serve projected build-out.

Page 4.3-179: Amend mitigation measure to require retention of storm water for new development per 100 year storm event.

Greater Monterey Peninsula Master Plan

The County should coordinate with Caltrans to determine what information must be submitted with the application for the designation of a Scenic Highway between the City of Seaside and the City Marina and how Monterey County and applicable jurisdictions must coordinate on the application.

Monterey County General Plan Update 5 EIR Comments
Page 2 of 3

Land Use

The City of Seaside has the following concerns related to the Fort Ord Master Plan Area:

Residential Land Use Policies

The Fort Ord Master Plan should acknowledge and discuss the City's future growth potential west of the urban boundary line. The City of Seaside is considering the following projects within its city limits:

1. Relocation of City of Seaside Corporation Yard to Polygon 18 on Figure 2; and
2. Development of a Veterans Cemetery on Polygon 20c on Figure 2; and
3. Surplus II Specific Plan on Polygon 20e on Figure 2.

Circulation Element

Of particular concern to the City of Seaside are the potential impacts that could be generated by residential and commercial development within the Fort Ord Area Master Plan and designated Affordable Housing Overlays within the Greater Monterey Peninsula. The City of Seaside recommends that the traffic study for the General Plan Update 5 include an evaluation of the cumulative impacts associated with the City of Seaside's and City of Marina's approved and planned projects in relation to the build-out of the County lands on Fort Ord and Fort Ord Business and Operations Plan (Appendix B of Reuse Plan) and study the following intersections/roadways:

Intersections

- General Jim Moore and Light Fighter Drive
- General Jim Moore and Giggling Road
- General Jim Moore and Coe Avenue
- General Jim Moore and Broadway
- Light Fighter Drive and Second Avenue
- Highway 1 and Light Fighter Drive
- Highway 1 and SR 218
- Del Monte Boulevard and SR 218 (Canyon Del Rey Blvd.)
- Del Monte Boulevard and Broadway Avenue
- Del Monte Boulevard and Playa Avenue
- Fremont Boulevard and SR 218 (Canyon Del Rey Blvd.)
- Fremont Boulevard and Broadway Avenue
- Fremont Boulevard and Ord Grove Avenue
- Fremont Boulevard and Del Monte Avenue
- Giggling Road and 8th Avenue
- Monterey Road and Fremont Boulevard
- Monterey Road and Coe Avenue

Monterey County General Plan Update 5 EIR Comments
Page 3 of 3

Roadways

- **Broadway Avenue between Del Monte Boulevard and General Jim Moore Road**
- **Del Monte Boulevard between Canyon Del Rey Boulevard and Fremont Boulevard**
- **Fremont Boulevard between Canyon Del Rey and Broadway Avenue**
- **Fremont Boulevard between Broadway Avenue and Highway 1**
- **General Jim Moore between SR 218 and Light Fighter Drive**
- **Eucalyptus Road**
- **Giggling Road between 8th Avenue and General Jim Moore Road**
- **Light Fighter Drive between General Jim Moore and Highway 1**

4

Hydrology and Water Quality

- **Update EIR to include identification of potential reservoir and water impoundment sites that would be located within the City of Seaside on the former Fort Ord and/or its sphere of influence as designated by LAFCO.**
- **The Marina Coast Water District shall be included in list of water agencies to mitigate further seawater intrusion.**

5

If you have any questions or comments regarding the City of Seaside's comments on the recirculation of the Environmental Impact Report for General Plan Update 5, you can contact me at (831) 899-6726.

Sincerely,



Rick Medina
Senior Planner

CC: Diana Ingersoll, Deputy City Manager-Resource Management Services
Barbara Nelson, Planning Services Manager



COUNTY OF SAN BENITO
PLANNING & BUILDING INSPECTION SERVICES

3224 Southside Road
Hollister, CA 95023
e-mail: sbcplan@planning.co.san-benito.ca.us

Phone: 831-637-5313
Fax: 831-637-5334

October 28, 2008

Carl Holm, Planning Manager
Monterey County Planning Department
168 W Alisal St., 2nd Floor
Salinas, CA 93901-2438

Subject: Comments regarding Monterey County's 2007 General Plan Update (5) DEIR

Dear Mr. Holm:

Thank you for the opportunity to review and comment on the 2007 Draft Environmental Impact Report for the Monterey County General Plan. Staff would like to express its support for the continued effort to complete this General Plan update. As a neighboring agency, San Benito County has a continued interest in this process. Decisions made within your jurisdictional boundaries may have significant effects on our County. Therefore, listed below are some comments submitted by staff in October of 2006, related to General Plan update number 4, and new concerns staff believes that the document should address in more detail. While past the official comment period, our Board will be reviewing this matter on November 4 and may also have some comments.

The County's previous comments regarding the 2006 General Plan update (update 4) Draft Environmental Impact Report, and subsequent comments follow.

- *We encourage Monterey County to work with San Benito County in improving locations along our shared border in areas such as near Gonzales, Soledad and King City in addition to the Aromas and Prunedale areas.*

Although this comment does not need to specifically be addressed in this EIR document, San Benito would like to emphasize the ongoing need for governmental cooperation when considering development projects or policies for development for which the effects would reach across County boundaries and potentially conflict with current San Benito County policies.

- *We are also interested in better coordinating public safety and transportation planning especially in those areas in particular along La Gloria Grade Road as some problems occur there from time to time.*

This comment relates directly to transportation corridor planning. Monterey County is in a unique position as it borders San Benito County, which has a number of recognized outdoor recreation areas. One area in particular, The Pinnacles, is working toward National Park status and as such may require increased attention from both San Benito and Monterey Counties in order to ensure access to the park is convenient, safe, and desirable.

- *We also would like to cooperate with you again in protection of the ridgeline areas that we share and in minimizing the impact of nighttime lighting in the rural areas.*

Land Use Element Policy LU-1.13 appears to appropriately address light and glare. Open Space and Conservation Element OS-1.12 appears to prohibit ridgeline development. Therefore, staff believes this 2006 comment has been adequately addressed. Thank you.

4

Staff requests the final EIR for the 2007 General Plan update address the following additional concerns:

Transportation:

Regional transportation impacts are addressed in Section 4.6. of this document. TRAN-1A, TRAN-2B, TRANS-3B describe that implementation of the 2007 General Plan would have significant impacts to roads within and external to Monterey County. In addition, TRAN-1A describes that neither the County nor TAMC projects listed as capital improvement projects, which are to be funded by regional impact fees, will fully mitigate the impacts of the 2007 plan. Staff feels that the development of policies should reach outside the established benchmarks of Monterey's policies. In addition, if regional traffic created by an authority's planning guidelines may substantially degrade neighboring jurisdiction roadways for which higher standards are in place, the governing authority has the responsibility to ensure traffic impacts are mitigated accordingly. Currently, San Benito County has established policy describing a minimum LOS of C for roadways within our County. Areas within San Benito which may be affected by Monterey County traffic impacts primarily include the Aromas area and State Highway 101. Monterey County's planning guidelines may have a significant effect on surrounding jurisdictions and should be restrictive in nature in order to provide continuity with all surrounding regional planning guideline standards. By encouraging full mitigation of any potential impacts Monterey County would not place additional burden on neighboring jurisdictions.

5

Air Quality:

Both San Benito and Monterey Counties are located within the Monterey Bay Unified Air Pollution Control District's jurisdiction. Being that we are in a common air basin, a discussion should be included in the environmental document that addresses this concern and the possible significant effects such as high levels of traffic congestion along the 101 corridor could have on attainment levels within either jurisdictions.

6

Thank you again for the opportunity to comment.

Sincerely,



Art Henriques
Director of Building and Planning

Cc: Susan Thompson, CAO
Board of Supervisors



COUNTY OF SANTA CRUZ

PLANNING DEPARTMENT

701 OCEAN STREET, 4TH FLOOR, SANTA CRUZ, CA 95060
 (831) 454-2580 FAX: (831) 454-2131 TDD: (831) 454-2123
 TOM BURNS, PLANNING DIRECTOR

February 2, 2009

Carl Holm
 RMA-Planning Salinas Permit Center
 168 W. Alisal St. 2nd Floor
 Salinas, CA 93901

Dear Mr. Holm,

Thank you for the opportunity to comment on the 2007 General Plan Update and the 2007 General Plan Draft EIR. The Planning Department has reviewed both documents. We wish to express our concerns regarding significant and unavoidable impacts to the Pajaro groundwater basin identified in the EIR, particularly as this may impact future development within Santa Cruz County.

As noted in Section 1.4 of the EIR, development consistent with the Monterey County 2007 General Plan would result in "significant and unavoidable impacts" to groundwater resources in the Pajaro basin, exacerbating existing groundwater overdraft and saltwater intrusion (Section 1, page 39 of EIR). Overdraft of the aquifer is anticipated, even with recycling and conservation measures.

To address significant and unavoidable impacts to the Pajaro groundwater basin, mitigation measure WR-1 would implement a regional group to identify and support a variety of new water projects, water management programs, and multiple agency agreements to provide additional domestic water supplies for Monterey Peninsula and Seaside basin, while continuing to protect the Salinas and Pajaro River groundwater basins from saltwater intrusion. However, even with the proposed mitigation measure, impacts to the Pajaro groundwater basin are anticipated to be "significant and unavoidable" (page 1-39).

We believe that mitigation measure WR-1 is inadequate to address the significant impacts to the Pajaro Groundwater Basin. The Santa Cruz County Planning Department is particularly concerned that the Pajaro area is proposed as one of five community areas, with development planned at an urban level. Such intensive development is likely to further exacerbate groundwater overdraft and saltwater intrusion within the Pajaro groundwater basin. Such impacts are likely to restrict future development in those portions of the Pajaro community within Santa Cruz County.

Monterey County
 Planning and Building
 Inspection Administration

FEB 02 2009

RECEIVED

Reid as CEQA
 Comments 2/2/09

11:57am

Calderon, Vanessa A. x5186

From: Annie Murphy [PLN400@co.santa-cruz.ca.us]
Sent: Monday, February 02, 2009 11:57 AM
To: ceqacomments
Subject: Comments from County of Santa Cruz Planning Department on the 2007 General Plan Update and Draft EIR



Letter to Monterey
County.doc ...

Hello Carl,

Monterey County
Planning and Building
Inspection Administration

FEB 02 2009

RECEIVED

Hope you and everyone in the Department are doing well!

Attached are the comments from the Santa Cruz County Planning Department regarding the Monterey County 2007 General Plan Update and Draft EIR.

Sincerely,

Annie Murphy
Planner, Policy Section
Santa Cruz County Planning Dept.
Phone: (831) 454-3111
Fax: (831) 454-2131
Email: pln400@co.santa-cruz.ca.us

<<Letter to Monterey County.doc>>

Holm, Carl P. x5103

From: Holm, Carl P. x5103
Sent: Thursday, October 16, 2008 8:58 AM
To: 'Hagan, Kristin A.'
Cc: 'Powers, Briana'
Subject: RE: 2007 General Plan Update

The ALUC asked for further information on a site near the Monterey Airport...it is planned to return to the ALUC on October 27. The Commission was were not concerned with the area around King City because it had not changed from what they considered and accepted in GPU4. Figure 4 in GPU4 illustrated the location of planned Community Areas. Land use designations around King City are illustrated on the South County Area Plan Land Use map (Figure LU-9). In addition, the Agricultural Winery Corridor Plan (AWCP) includes area around King City. All of this is available for review on our website at:
http://www.co.monterey.ca.us/planning/gpu/GPU_2007/gpu_2007.htm

If after reviewing this information you have questions, please feel free to contact me.

Sincerely,
Carl P. Holm, AICP
RMA - Planning Department
Assistant Director

-----Original Message-----

From: Hagan, Kristin A. [mailto:khagan@kmtg.com]
Sent: Wednesday, October 15, 2008 11:57 AM
To: Holm, Carl P. x5103
Cc: Powers, Briana
Subject: 2007 General Plan Update

Carl,

Thanks for you return call yesterday. Per your request I'm sending you an e-mail regarding my questions pertaining to the 2007 General Plan Update. As indicated in my messages, I practice airport land use planning and have a number of clients with projects near the King City Airport. I noticed that the Monterey County Airport Land Use Commission received at its last meeting on September 22, 2008, an update regarding the status of the 2007 General Plan Update. I was wondering if at that meeting the Commission voted to take any action with respect to reviewing and considering the 2007 General Plan Update.

I also noticed that in the 2006 General Plan Update (GPU4), there is a reference to a *Figure 4*, which illustrates the proposed land uses within two-miles of the King City Airport. I'm trying to confirm whether that same figure is referenced and used in the 2007 General Plan Update. If so, I would like to get a copy of this figure.

Any assistance you can provide is greatly appreciated. Thanks for your time.

Take care,
Kristin

Kristin A. Hagan
Attorney at Law

1675 Chester Avenue, Suite 320
Bakersfield, CA 93301

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MONTEREY BAY
Unified Air Pollution Control District
serving Monterey, San Benito, and Santa Cruz counties

Monterey County
Interim Air Pollution Control Officer
Planning and Building
Inspection Administration

24580 Silver Cloud Court • Monterey, California 93940 • 831/647-9411 • FAX 831/647-8501

FEB 02 2009

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Sent Electronically To: *Resid e mail*
CEOAComments@co.monterey.ca.us
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2/2/09
2/2/09
3:50 pm

February 2, 2009

Mr. Carl Holm, Assistant Planning Director
Monterey County RMA / Planning Department
168 West Alisal Street, 2nd Floor
Salinas, Ca 93901

SUBJECT: 2007 MONTEREY COUNTY GENRAL PLAN DRAFT EIR (GPU5)

Dear Mr. Holm:

The Air District submits the following comments for your consideration:

4.7.2 ENVIRONMENTAL SETTING:

P. 4.7-2. Air Pollutants

Please note the Table 4.7-1, which is referenced in this section, is missing. This table was to summarize current State and federal Ambient Air Quality Standards (AAQS). Table 4.7-1 on page 4.7-6 of the DEIR presents the distribution of statewide wine fermentation emissions by month rather than information in a format that could be compared to applicable AAQSs. Current AAQSs are summarized in the attached PDF table and can be accessed at <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>.

1

P. 4.7-3. Ozone, Natural vs. Man-Made VOC

This section blends a discussion of natural and anthropogenic (man-made) emissions. The first and second sentences on this page indicate that current NCCAB emissions of VOC are estimated to be 100 to 125 tons per day and that most of the emissions come from the oak and coastal chaparral environment. As described in the first paragraph on page 4-7 of 2008 AQMP, these figures actually refer to naturally occurring VOC emissions and not man-made or anthropogenic emissions. The 2008 AQMP focuses on man-made emissions, which is the category of emissions subject to regulation. As illustrated in Figure 4-3 in the 2008 AQMP, 2007 NCCAB anthropogenic emissions of VOC are estimated to be 70 tons per day.

2

P. 4.7-3. Ozone, Natural vs. Man-Made NOx

Similarly, the third sentence indicates that NCCAB emissions of NOx are in the 1 to 5 ton per day range and are highest during wildfire events. Again, these figures pertain to naturally occurring emissions and not regional man-made NOx emissions. Man-made emissions of NCCAB NOx are illustrated in Figure 4-7 of the 2008 AQMP and are estimated to be 81 tons per day. The District would be glad to provide additional information on this subject.

3

- DISTRICT BOARD MEMBERS
- CHAIR: Simon Salinas Monterey County
- VICE CHAIR: Sam Storey Santa Cruz County Cities
- Lou Calcagno Monterey County
- Tony Campos Santa Cruz County
- Dennis Donohue City of Salinas
- Joseph Russell Monterey Peninsula Cities
- Ellen Pritz Santa Cruz County
- Jane Parker Monterey County
- Rob Monaco San Benito County
- Richard Ortiz South Monterey County Cities

P. 4.7-3. Ozone, Discussion of Federal Standard

The first sentence of the first full paragraph on this page indicates that on June 15, 2004 the EPA replaced the 1979 one-hour standard with more stringent 8-hour standard. The EPA adopted the 0.08 ppm 8-hour standard in 1997 and on June 15, 2004 the EPA designated the NCCAB as an attainment area for the 8-hour standard. The 1979 one-hour standard was then revoked one year later on June 15, 2005. The eight-hour federal standard adopted by EPA in 1997 is 0.08 ppm. Please refer to pages 5 through 7 of the District's 2007 Federal Maintenance Plan for further discussion. This can be accessed at <http://www.mbuapcd.org/index.cfm?Doc=451>. After the Maintenance Plan was prepared, EPA adopted a more stringent eight-hour standard of 0.075 ppm on March 12, 2008.

4

P. 4.7-3. Ozone, Discussion of State Standard

The second sentence of the second full paragraph on this page indicates that the new State 8-hour standard is 0.07 ppm. It should be noted that the State standard is 0.070 ppm, with three significant figures. This is important because it reduces round-off play when averaging data. Currently, the State ozone standard is more stringent (health protective) than the corresponding federal standard.

5

P. 4.7-3. Carbon Monoxide

State and federal standards were not exceeded during 2005-2007, which is the most recent three years of data. As part of the Environmental Setting discussion, it should be mentioned that ambient CO readings in the NCCAB are low and have a history of being well within applicable standards.

6

P. 4.7-3. Nitrogen Oxides

In order to relate this section to the NCCAB, the Draft EIR should have specified that major sources of NO_x in the NCCAB include exhaust emissions from on-road motor vehicles, off-road mobile sources and industrial sources. These are illustrated in Figure 4-5 of the 2008 AQMP. There are no refineries in the NCCAB.

7

The NCCAB is designated attainment for the State NO₂ standard and Unclassified/Attainment for the federal NO₂ standard. Current NCCAB designations for all criteria pollutants are presented in Table 2-2 on page 2-5 of the 2008 AQMP.

P. 4.7-4. Particulate Matter

To relate this section to the NCCAB, please note that primary sources of particulate matter in the NCCAB include fugitive dust from unpaved roads, agricultural tilling, agricultural wind-blown fugitive dust, prescribed fires and construction dust. These are summarized in Table 4-2 of the District's 2005 Particulate Matter Plan, which is available at <http://www.mbuapcd.org/index.cfm?Doc=358>.

8

P. 4.7-4. Volatile Organic Compounds

The third sentence indicates that major sources of VOCs include oil refineries, and oil-fired power plants. There are no oil refineries or oil fired power plants in the NCCAB. Major sources of VOCs in the NCCAB include exhaust emissions from on-road motor vehicles, solvent evaporation, and exhaust emissions from off-road mobile sources (See Figure 4-3 from the 2008 AQMP). Wineries are a minor contributor to regional VOCs representing less than 1% of the NCCAB VOC inventory.

9

P. 4.7-5. Wine Fermentation Discussion

The sixth paragraph on this page ends in a comma. Please complete the sentence or make the necessary typographical correction.

10

P. 4.7-5. Discussion on Wine Making Process

The extended discussion on how wine is made, while informative, deviates from the general discussion on VOCs and would fit better in a separate section.

11

P. 4.7-6. Table 4.7-1, Statewide Wine Fermentation

The monthly distribution of wine fermentation emissions shown in the table would be more informative if they were specific to the amount of wine actually fermented in Monterey County. Also, the discussion introduces the fermentation figures as being harvest figures. Because wine grapes can be exported to other areas, the amount of wine grapes harvested in Monterey County is not relevant unless the Draft EIR specifies

12

- the amount of grapes that are grown locally
- the amount and increase of the local harvest that is fermented locally
- the amount and increase / decrease of local harvest that is shipped outside Monterey County
- and a comparison of the potential increase in emissions from Monterey County fermentation and wine aging, compared to the decrease in emissions (VMT) that would be avoided by a decrease in shipment of local grapes to out-of-County grape processors / winemakers and wine agers.

P. 4.7-7. Table 4.7-1, Toxic Air Contaminants

The first sentence in the third paragraph on this page indicates that CARB has listed particulate matter as a TAC. The sentence should be corrected to specify that this listing pertains to diesel particulate matter (diesel exhaust) and not particulate matter in general.

13

P. 4.7-7. Attainment Status

Many of the designations described in this section are dated. Please refer to Table 2-2 on page 2-5 of the 2008 AQMP for current designations. For instance, in relation to the State ozone standard, the ARB's most recent designation (July 26, 2007) shows that the NCCAB is nonattainment. The moderate nonattainment and nonattainment transitional designations are no longer applicable. The first sentence of the second paragraph under Attainment Status states that EPA has designated the NCCAB as a moderate maintenance

14

~~area for ozone. There is no such thing as a moderate maintenance area and EPA has designated the NCCAB as an attainment area for ozone.~~

14

P. 4.7-8. Air Quality Monitoring Data

Please note that Table 4.7-2 referenced in this section is missing. This table was to summarize the most recent three years of data for Monterey County. Table 4.7-2 in the DEIR (page 4.7-11) summarizes wine fermentation and aging emissions.

15

P. 4.7-8. Air Quality Monitoring Data

The third sentence in this section indicates that the Salinas station is the monitoring station for Monterey County. Please note that the Salinas site is not the only air monitoring station operated in Monterey County as there are two other air monitoring stations: one in King City and one in Carmel Valley. Including data from these sites would more accurately portray air quality in Monterey County.

16

4.7.3 REGULATORY FRAMEWORK:

P. 4.7-8. EPA

The second sentence in this section states that the NAAQS are set to the maximum ambient (background) level considered safe. The NAAQS are set according to the maximum safe level in the ambient breathable outdoor air, and according to background. Background is typically a much lower concentration than levels that include man-made emissions.

17

P. 4.7-8. CARB

It should be noted that State law vests California Air Resources Board (CARB) with direct authority to regulate pollution from motor vehicles registered in California, as well as fuels and consumer products sold in the State.

18

P. 4.7-9. MBUAPCD

The overall role of the MBUAPCD should be mentioned before introducing the specific construction mitigation measures. For reference, as required by the California Clean Air Act and Amendments (HSC Section 40910 et seq.) and the Federal Clean Air Act and Amendments (42 U.S.C. Section 7401 et seq.), the District is responsible for air monitoring, permitting, enforcement, long-range air quality planning, regulatory development, education and public information activities related to air pollution. California Health and Safety Code Sections 39002, et seq. and 40000, et seq. require local air districts to be the primary enforcement mechanism for controlling pollution from local business and industry. Air districts must have rules and regulations for the attainment and maintenance of federal and state ambient air standards.

19

P. 4.7-10. MBUAPCD

The first header indicates that the MBUAPCD has mitigation measures for heavy duty equipment. The measures listed are specific to heavy duty diesel equipment. Also, a typo in the hyphenated word "non-zone season" in the 4th bullet in this section needs to be corrected to read "non-ozone season".

20

P. 4.7-11. MBUAPCD Air Quality Management Plan

The operative Air Quality Management Plan (AQMP) was adopted by the Air Board in August 2008. It integrated the Association of Monterey Bay Area Government's "Monterey Bay Area 2008 Regional Forecast" for population, housing and employment. Before discussing the District's 2008 AQMP for ozone, it would be helpful to mention two other important air plans the District has developed for the region:

21

SB 656 Particulate Matter Plan (December 2005)

This plan outlines measures to make progress toward achieving the State PM₁₀ standard by reducing fugitive dust, especially along the ag/urban interface, as well as emissions of particulate matter from diesel exhaust through education about Best Management Practices and grant incentives.

2007 Federal Maintenance Plan

This plan describes how the federal ozone standard will be maintained in our area.

P. 4.7-11. Table 4.7-2, AQMP VOC Aging & Fermentation Emissions

A numerical artifact (16510.8257) appears in this table for the year 2030 Wine Aging category. The number from the AQMP is 0.8257 tons per day.

22

P. 4.7-12. Rules 201 and 417

In the second bullet, please correct the text following the rule name for Rule 207, which makes this sentence hard to follow. Also, in the following paragraph, wineries may be subject to prohibitory Rule 417, Storage of Organic Liquids, whether or not they are exempt from Rule 201. While Rule 417 applies primarily to storage of petroleum based liquids, it would be applicable to wineries if vapor pressure and tank size met the criteria of the rule.

23

4.7.4 PROJECT IMPACTS:P. 4.7-12. Thresholds of Significance

It should be noted that the 137 lbs/day construction related threshold for NO_x only applies to non-typical construction equipment (page 7-2 District's 2008 CEQA Guidelines). Typical equipment, which includes scrapers, tractors, dozers, graders, loaders and rollers, are accommodated in the District's emission inventory.

24

P. 4.7-13. Thresholds of Significance

Similar to the prior comment, the last paragraph under 4.7.4.1 should be modified to state that emissions of ozone precursors, including NO_x and VOC, from typical construction equipment are accommodated in the inventory.

25

P. 4.7-15. AO-1, Table 4.7-3, Population Consistency

This section concludes that the 2007 General Plan is consistent with the population

26

growth projected in the MBUAPCD's AQMP and therefore impacts associated with AQ-1 are less than significant. However, the comparisons are based on the outdated 2004 AMBAG population figures for Monterey County for 2030, which were used in the 2004 AQMP. AMBAG's 2008 population forecast for 2030 is 515,549 and is lower than the 602,790 population figure for 2030 shown in Table 4.7-3 for the 2007 General Plan. The 2007 General Plan population forecast for 2030 is 87,241 persons greater than the applicable 2008 AMBAG forecasts for 2030, and would make the General Plan Update inconsistent with the applicable AQMP and a significant impact to air quality in the region.

26

P. 4.7-15. AQ-1, Table 4.7-3, Demographic Figures

Please explain why the Population, VMT, Housing Units and Employment "With Project" figures decrease between 2000 and 2030, despite the General Plan Update's accommodating greater population, housing and VMT.

27

P. 4.7-15 & 16. AQ-1, MBUAPCD AQMP

The significance determination section uses the generic name Clean Air Plan for the District's AQMP for ozone. Please specify which plan is being referred to (2004 or 2008) and note that the actual name of the document is the Air Quality Management Plan. As already specified, herein, the operative AQMP was approved in August 2008.

28

P. 4.7-16. AQ-1, Table 4.7-4, VOC Fermentation Emissions

Please note that the fermentation emission factors for red and white wine used in Table 4.7-4 are actually from ARB (ARB Area Source Methods, Chapter 5.1, March 2005) and not EPA. The factors in the table are higher than those used in the AQMP, which were from Chapter 9.12.2 of EPA's AP-42 document. The AQMP used EPA's factors of 4.6 and 1.8 lbs/kgal for red and white respectively, rather than the 6.2 and 2.5 lb/kgal factors shown in the table. If the same factors were applied as used in the 2008 AQMP, estimated fermentation emissions associated with 10 full scale and 40 artisan wineries would be lower than the 905.3 lbs/day shown in the table.

29

P. 4.7-16. AQ-1, Table 4.7-4, VOC Aging Emissions

The calculations for the red and white aging related emission factors (0.02782 and 0.02583 lbs/kgal) given in the table appear to be off by a factor of 1,000 and do not work out as shown in the table. Please verify the units of the factors and make any necessary corrections to the table.

30

P. 4.7-17. AQ-1, Buildout Significance Conclusion

It is concluded that air quality impacts associated with buildout by 2092 would be less than significant because of the beneficial policies in the 2007 General Plan and Area Plans. However, consistency with the AQMP is determined by consistency with the population forecasts in the AQMP, not area plans. Also, the expected air quality benefits of the 2007 General Plan and local Area Plans are not quantified. Since the 2092 buildout date is beyond the forecast horizon of the 2008 AQMP and AMBAG population forecasts, the significance conclusion cannot be supported.

31

Moreover, even if the “encouragement” and “promotion” activities cited as mitigation in various policies in pages 4.7-13 et seq. were actually undertaken, encouragement and promotion do not guarantee that anything quantifiable or enforceable would result, so this text and any implied mitigation should be eliminated from the EIR.

Mobile Source Emissions Associated with Growth

The Air District does not have regulatory authority over mobile sources.

Without stable funding to ensure the availability of public transit, the air quality benefits of this alternative to single-occupancy automobiles should be constrained; this potential mitigation should be better evaluated.

What evidence exists to support an inference that employees would bike or walk to work (how many people, how often, and what amount of VMT would be reduced)?

31

Area Source Emissions Associated with Growth

A significant reduction to ozone precursors and particulate matter could be accomplished by restricting the installation and operation of wood-burning fireplaces and stoves. Many cities have adopted this strategy to reduce their project’s air quality impacts to less-than-significant levels. The following is suggested for implementation by the County as a standard condition:

“The construction, installation or operation of a wood-burning fireplace or a wood-burning stove shall be prohibited in perpetuity on all residential properties. Only EPA-certified natural gas/liquefied petroleum gas (LPG) fireplaces/ stoves shall be constructed, installed or operated. This restrictive covenant shall be recorded on the title of all parcels in the project and shall run with the land. All Building Plans and Building Permits shall include this express condition.”

P. 4.7-20. AQ-2, Significance Determination – The second paragraph is rather disjointed and should be rewritten.

32

P. 4.7-20. AQ-2, Mitigation Measure AQ-1

The disjointed sentence following OS-10.5 should also be rewritten.

33

P. 4.7-20. AQ-2, 2030 Significance Conclusion

Implementation of MBUAPCD’s mitigation measures by policy for construction activities and equipment is a very good idea. However, there is no guarantee that they would reduce emissions unless they are quantified and enforced to reduce emissions to a less-than-significant level... Consequently, the conclusion of a less than significant impact is speculative at this time. Also, the construction related mitigation measures referenced should read AQ-1 and AQ-2 rather than AQ1 though AQ-3 and the referenced planning horizon should be 2030 rather than buildout.

34

P. 4.7-21. AQ-2, Buildout Significance Conclusion

The same comments as applied to the 2030 planning horizon also apply here.

35

P. 4.7-22. AQ-3, Appendix A EMFAC Calculation

36

The third full sentence on this page indicates that the methodology and traffic data input to the EMFAC2007 on-road motor vehicle emission model are provided in Appendix A of the DEIR. However, Appendix A contains the Notice of Preparation and the referenced calculations cannot be found or reviewed. As a result, it was not possible to evaluate this information.

36

P. 4.7-22. Table 4.7-5, Entrained Paved Road Dust

The EMFAC model only estimates exhaust emissions for PM10 and PM2.5, but not entrained road dust for paved road dust. Since entrained road dust emissions increase with VMT, the entrained road dust calculations should be added to the exhaust emissions and the corresponding conclusions updated to reflect the revised totals.

37

P. 4.7-23. Table 4.7-6, Year 2000 Existing Environment

The year of the existing environment in this table is taken as the year 2000, which is no longer representative of the existing environment. The existing environment should be a year closer to the time the Notice of Preparation for GPU5 was submitted, which was 2007.

38

P. 4.7-24. Table 4.7-7, VOC Winery Emissions

The same comments as applied to Table 4.7-4 apply here. Please verify the units of the factors and make any necessary corrections to the table.

39

P. 4.7-33. MM AQ-6. Construction Contracts

As written, this mitigation measures does not ensure that emissions would be less than significant. One-size-fits-all does not work, especially in an industry that uses various models, model years and configurations of equipment on each job. IN addition, project location and meteorological conditions are factors that affect air quality; a project in a remote area that would not result in unhealthful emissions would be evaluated differently from a project in an area of dense urban development. The Air District suggests that construction equipment should comply with applicable State laws and regulations, and Air District thresholds of significance.

40

P. 4.7-33. AQ-7, Development of Sensitive New Land Uses

As written, this mitigation measures is precatory; it is not enforceable. Given the County's authority over land use decisions, if the County chooses not to implement the siting recommendations in the California Environmental Protection Agency / California Air Resources Board's "Air Quality and Land Use Handbook: A Community Health Perspective, it would be more helpful to simply notify prospective residents of the potential long-term health impacts, as in being done in Fresno County.

41

Section 4.16, Climate Change

Inasmuch as the narrative in Chapter 4.16 is based on Appendix B - Methodology, comments are focused on it.

42

Vehicular Emissions

Off-road vehicular emissions are not included. Agricultural off-road emissions are estimated but the methodology used is very limiting.

Trying to establish the "unincorporated-only" emissions (see above) all VMT on County roads and 25% of the VMT on state highways have been included. This appears to be based on a 75%/25% split in population between City and County residents. Please explain the basis for this split.

Initially, there seems to be a "source" mix-up. In the text it refers to Brusco but the table refers to Fomey. Please explain.

Please explain why they fugitive CH₄ emissions from gas transmission were not included.

Landfill Emissions

Emission factors from ICLEI/CACP Software are cited but there is not relation to the emission factor, or its derivation. ICLEI does not generate emission factors. What methodology was used?

The document states that 97% of the solid waste goes to landfills that are flared, or have landfill gas to energy technologies. It also specifies that EPA has estimated flaring efficiency to be 75%. This efficiency factor was used to estimate all of Monterey's net CH₄ emissions. This generates a couple of concerns:

It did not differentiate between the flaring and the landfill gas to energy technologies. These efficiencies are different.

The flaring efficiency states that the 75% of CH₄ is converted to CO₂. What are the resulting CO₂ emissions?

Agricultural Equipment Fuel Use

The method compares the proportion of agricultural acreage in Monterey to that in all of California and then apportions the state GHG emissions for agriculture proportionately. The use of this method should be explained. (The ARB has a model (OFFROAD) which is used to estimate criteria emissions from off-road motor vehicle sources, including agricultural equipment. It has already apportioned this usage by county and air basin and have projected the growth and controls out to the future. This model is for criteria pollutants and does not include factors for CO₂, CH₄, or N₂O like the on-road equivalent (EMFAC), but it does include estimated fuel usage. At least the CO₂ (which is the majority of the associated GHG emissions) could be estimated by using the fuels usage and the CCAR's fuel-based emission factor.)

43

The ARB method would be doubly useful in that it would also allow for the estimation of all off-road equipment, including construction, industrial, and recreational. Please explain why this method was not used.

General Comments on Forecasting Methodology

The document states that fuel efficiency and low carbon fuel standards were used in estimating future, but this did not include reduction on GHG emissions from heavy-duty vehicles. Please explain.

The document concludes that an 8% increase in renewables forecasted by PG&E would result in an equivalent 8% reduction in CO₂. . This assumes that renewables have no CO₂ emissions, which is not accurate. Renewables have reduced CO₂ emissions, not zero CO₂ emissions. Please explain.

43

Thank you for the opportunity to review the document.

Sincerely,

Jean Getchell
Supervising Planner
Planning and Air Monitoring Division

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹		Federal Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O ₃)	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)		0.075 ppm (147 µg/m ³)		
Respirable Particulate Matter (PM ₁₀)	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		—		
Fine Particulate Matter (PM _{2.5})	24 Hour	No Separate State Standard		35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	15.0 µg/m ³		
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m ³)	None	Non-Dispersive Infrared Photometry (NDIR)
	1 Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—		
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m ³)	Same as Primary Standard	Gas Phase Chemiluminescence
	1 Hour	0.18 ppm (339 µg/m ³)		—		
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	—	Ultraviolet Fluorescence	0.030 ppm (80 µg/m ³)	—	Spectrophotometry (Pararosaniline Method)
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (365 µg/m ³)	—	
	3 Hour	—		—	0.5 ppm (1300 µg/m ³)	
	1 Hour	0.25 ppm (655 µg/m ³)		—	—	
Lead ⁸	30 Day Average	1.5 µg/m ³	Atomic Absorption	—	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m ³		
	Rolling 3-Month Average ⁹	—		0.15 µg/m ³		
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No		
Sulfates	24 Hour	25 µg/m ³	Ion Chromatography	Federal Standards		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ⁸	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography			

See footnotes on next page ...

For more information please call ARB-PIO at (916) 322-2990

California Air Resources Board (11/17/08)

1. California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter—PM₁₀, PM_{2.5}, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.
8. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
9. National lead standard, rolling 3-month average: final rule signed October 15, 2008.

Monterey County
Planning and Building
Inspection Administration

FEB 06 2009

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10:41 AM

—Original Message—

From: Tim Jensen [mailto:tjensen@mprpd.org]
Sent: Friday, February 06, 2009 10:41 AM
To: Holm, Carl P. x5103
Subject: GPU5 Comments

Good Morning Carl;

I apologize for the late submission. Could you review the District's comments and reply with a short summary opinion on their validity. Thx. If I don't hear back from you these are what the District will submit.

Tim Jensen
Planning & Conservation Manager

Monterey Peninsula Regional Park District
60 Garden Court, Suite 325
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State Planning and Zoning Law (Government Code Section 65302(a)) establishes the requirements for the land use element of the general plan. The Land Use Element guides decision makers, planners and the general public as to the ultimate pattern of development within the unincorporated areas of the county. It designates the general distribution, location and extent of land uses, such as housing, business, industry, open space, agriculture, natural resources, recreation, and public/quasi-public uses. The Land Use Element also discusses the standards of residential density and non-residential intensity for the various land use designations.

The Land Use Element governs how land is to be utilized. Many of the issues and policies contained in other plan elements are linked in some degree to this element. For example, the amount, distribution, and timing of growth expressed within the Land Use Element must correlate with the anticipated road capacity and performance standards established in the Circulation Element. Similarly, the location and density of uses prescribed by this Element are integrally linked to policies for the protection of environmental resources included in the Conservation/Open Space Element. This element must establish the ability to provide adequate land use in order to meet regional housing needs. Housing Elements are mandated by State law to be updated every five years, so the General Plan must set the land use context for continued coordinated implementation of subsequent required updates to the Housing Element over the life of this Plan.

Monterey County's Land Use Element establishes policies to designate the general distribution and intensity of residential, commercial, industrial, agricultural, public facilities, and open space uses of the land in the County. The main vision of this Element is to create a general framework that encourages growth within or near developed/developing areas in order to reduce impacts to agricultural production, natural resources, or public services. Areas where development would be encouraged include incorporated cities and designated community areas where existing services are available (*Figure 4, next page*). These areas would be subject to additional levels of planning consisting of city general plans adopted by cities and community plans or specific plans to be adopted by the Board of Supervisors for the community areas. In addition, the Plan designates rural centers where development has started and that will be allowed to develop in a semi-rural character (*Figure 5, next page*).

Monterey County's General Plan consists of policies that apply countywide and policies unique to a specific region. Countywide policies are applicable to the entire unincorporated area and are included within this Land Use Element. More focused policies that address specific regional or local issues are found in Area Plans. The Land Use Maps and land use designation descriptions in this general plan cover all inland, unincorporated, areas of the county. Due to the size of the County, Land Use Maps are divided by Planning Areas and are included as part of this Land Use Element (*Policy LU-1.11*).

Approximately one percent of Monterey County has been developed with residential (0.7%), commercial (0.03%), and industrial (0.3%) uses. Most of this development is concentrated in the northern one-third of the County. Agriculture is the largest land use representing almost 60% of the total land area. The second largest land use consists of public and quasi-public uses (about 28%) such as educational, transportation, and military facilities as well as religious, recreational/cultural and community facilities.

**GOALS AND POLICIES
LAND USE**

GENERAL LAND USE

GOAL LU-1

PROMOTE APPROPRIATE AND ORDERLY GROWTH AND DEVELOPMENT WHILE PROTECTING DESIRABLE EXISTING LAND USES.

Policies

- LU-1.1 The type, location, timing, and intensity of growth in the unincorporated area shall be managed.
- LU-1.2 Premature and scattered development shall be discouraged.
- LU-1.3 Balanced development of the County shall be assured by designating adequate land for a range of future land uses.
- LU-1.4 Growth areas shall be designated only where an adequate level of services and facilities such as water, sewerage, fire and police protection, transportation, and schools exists or can be assured concurrent with growth and development. Phasing of development shall be required as necessary in growth areas in order to provide a basis for long-range services and facilities planning.
- LU-1.5 Land uses shall be designated to achieve compatibility with adjacent uses.
- LU-1.6 Standards and procedures to assure proper levels of review of development siting, design, and landscaping shall be developed.
- LU-1.7 Clustering of residential development to those portions of the property which are most suitable for development and where appropriate infrastructure to support that development exists or can be provided shall be strongly encouraged. Lot line adjustments among four lots or fewer, or the re-subdivision of more than four contiguous lots of record that do not increase the total number of lots may be allowed pursuant to this policy without requirement of a general plan amendment.

1 LU-1.8 Voluntary reduction or limitation of development potential in the rural and agricultural areas through dedication of scenic or conservation easements, Transfer of Development Rights (TDR), and other appropriate techniques shall be encouraged. The Transfer of Development Credit (TDC) in the Big Sur Land Use Plan is a separate program to address development within the critical viewshed. A TDR Program shall be established to provide a systematic, consistent, predictable, and quantitative method for decision-makers to evaluate receiver sites in areas of the unincorporated County with priority for locations within

Summary of Comments on Policy LU-9

Page: 5

Author: Tim Subject: Recharge Date: 12/29/06 11:49:25 AM -0500
 Author: Tim Subject: Hole Date: 12/29/06 11:46:59 AM -0500
 Voluntary reduction, and other appropriate techniques shall be applied and encouraged to address public and private concerns of agencies and organizations.

Author: Tim Subject: Redwings	Date: 1/2/2008 11:47:54 AM -0800
Author: Tim Subject: Note	Date: 1/2/2008 11:50:44 AM -0800
Author: Tim Subject: Redwings	Date: 1/2/2008 11:50:21 AM -0800
Author: Tim Subject: Note	Date: 1/2/2008 11:51:51 AM -0800
Author: Tim Subject: Note	Date: 1/2/2008 11:54:07 AM -0800
Author: Tim Subject: Redwings	Date: 1/2/2008 11:52:21 AM -0800
Author: Tim Subject: Note	Date: 1/2/2008 11:52:53 AM -0800

2 LUU-2.2 Residential development shall be limited in areas that are considered for more intensive development due to physical hazards and development constraints, the need to protect natural resources, or the lack of public services and facilities.

LUU-2.3 High density residential areas shall be designated closest to urban areas, in community areas, rural centers or existing unincorporated communities.

LUU-2.4 Areas designated for residential use shall be located with convenient access to employment, shopping, recreation, and transportation. Higher density residential areas should be located with convenient access to public transit.

LUU-2.5 Adequate circulation rights-of-way shall be delineated within each residential area.

3 LUU-2.6 New land use activities or changes in land use designations that may potentially be nuisances and/or hazards shall be discouraged within and in close proximity to residential areas.

4 LUU-2.7 Open space should be provided in and/or on the fringes of residential areas.

LUU-2.8 The County will designate and establish regulations for an Agricultural Buffer/conservation easement (AB) designation to protect the existing agricultural operation (see Policy AG-1.2 for buffer criteria).

5 LUU-2.9 In areas designated for agricultural uses where development of legally subdivided land would promote incompatible residential development, the County shall solicit and encourage the voluntary donation of conservation easements or other development restrictions to the County or to a qualified private nonprofit organization in order to preserve the agricultural... LUU-2.10 In areas where Adequate Public Facilities are... accessory dwelling unit shall be allowed on a residentially designated lot if it meets the following criteria:

- a. adequate water and sewer facilities exist, which may include on site wells and septic;
- b. the lot is zoned for single family or multi family use;
- c. the lot contains an existing single family dwelling;
- d. the increased floor area of an attached second unit does not exceed 30% of the existing living area of the main dwelling unit;
- e. the total area of floor area for a detached second unit does not exceed 1,200 square feet.
- f. height, setback, lot coverage and other applicable zoning regulations are met.

Author: The Subject Exchange Date: 1/22/2016 10:31:32 AM -0800

Author: The Subject Note Date: 1/22/2016 10:32:30 AM -0800

The regional meet also held in.

Author: The Subject Note Date: 1/22/2016 10:32:30 AM -0800

The regional meet also held in.

Author: The Subject Exchange Date: 1/22/2016 10:31:32 AM -0800

LU-5.9 The proximity of other compatible land uses having similar levels of utility and service requirements shall be considered when designating industrial areas.

PUBLIC/QUASI-PUBLIC

GOAL LU-6

ENCOURAGE USES ON PUBLIC LANDS THAT ARE COMPATIBLE WITH EXISTING AND PLANNED USES ON ADJACENT LANDS.

Policies

LU-6.1 The *Public Quasi-Public* (PQP) land use designation accommodates publicly or privately owned uses such as schools, parks, regional parks, public works facilities and hospitals that serve the public at large.

LU-6.2 Lands that are owned by a federal, state, or local public agency may be designated as *Public/Quasi Public* (PQP). Regulations for those lands will be established accordingly.

LU-6.3 The County's planning activities shall be coordinated with the planning efforts undertaken by other public agencies with landholdings in Monterey County.

LU-6.4 The planning for public lands adjacent to private lands should be undertaken as a joint effort between all of the affected agencies and private property owners.

LU-6.5 In determining the impact of general plan land use designation amendments for land adjacent to military bases, installations, operating training areas, or underlying designated military aviation routes and airspace, information from the military and other sources shall be considered.

WATER BODIES

GOAL LU-7

ENCOURAGE THE USE OF THE COUNTY'S MAJOR INLAND WATER BODIES FOR MULTIPLE PURPOSES SUCH AS WATER SUPPLY, FLOOD CONTROL, AND HYDROELECTRIC GENERATION.

Policies

LU-7.1 Priorities for multiple uses of the major water bodies shall be established. Recreation shall be secondary to water supply, flood control and hydroelectric generation.

LU-7.2 Compatibility between multiple uses of major water bodies and surrounding land uses shall be considered.

OPEN SPACE

GOAL LU-8

ENCOURAGE THE PROVISION OF OPEN SPACE LANDS AS PART OF ALL TYPES OF DEVELOPMENT INCLUDING RESIDENTIAL, COMMERCIAL, INDUSTRIAL, AND PUBLIC.

Policies

LU-8.1 The open space needs of the community and new development shall be reviewed and addressed through the planning process.

LU-8.2 Clustering, consistent with the other policies of this Plan, shall be considered as a means of maximizing permanent open space within new development.

LU-8.3 As part of development review and approval, on-site development density credit consistent with the underlying land use designation shall be given for developable lands placed in permanent open space as part of a development. Use of the on-site development density credit will be allowed only if environmental, health and public safety factors permit.

LU-8.4 Wherever possible, open space lands provided as part of a development should be integrated into an area-wide open space network.

LU-8.5 Development should consider use of open space buffers on the perimeter and integrated into the development.

LU-8.6 Creation of private, nonprofit land trusts and conservation organizations to receive development rights on any lands to be preserved and maintained as open space shall be supported.

GENERAL PLAN CONSISTENCY WITH ZONING

GOAL LU-9

MAINTAIN CONSISTENCY BETWEEN THE GENERAL PLAN AND ITS IMPLEMENTING REGULATIONS.

Policies

LU-9.1 Within three months after adoption of the updated General Plan, the Director of Planning shall bring to the Board of Supervisors for their approval a work

Author: Tim Subject: Recastyle Date: 1/2/2008 10:32:25 AM -0800
Author: Tim Subject: Hole Date: 1/2/2008 10:37:20 AM -0800
Author: Tim Subject: Recastyle Date: 1/2/2008 10:37:52 AM -0800
Author: Tim Subject: Hole Date: 1/2/2008 11:26:05 AM -0800

Development should consider... into the development. When development is addressed in a public and/or commission, the author shall be at least 1000 feet distance

WATER TRANSPORTATION

GOAL C-9

TO PROMOTE SAFE, CONVENIENT, AND APPROPRIATE WATER TRANSPORTATION FOR MONTEREY COUNTY.

Policies

- C-9.1 Land use activities in the immediate vicinity of harbors shall be compatible with the continued optimum commercial and recreational operations of the harbor.
- C-9.2 Plans for significant increases in harbor and adjacent activities shall address environmental and transportation impacts
- C-9.3 Any construction or operation of mooring facilities that may pose significant hazards or threats to marine or coastal resources shall be opposed.

BICYCLE TRANSPORTATION

GOAL C-10

PROMOTE A SAFE, CONVENIENT BICYCLE TRANSPORTATION SYSTEM INTEGRATED AS PART OF THE PUBLIC ROADWAY SYSTEM.

Policies

- C-10.1 An integrated system of suggested bicycle routes for Monterey County shall be established.
- C-10.2 A comprehensive bicycle plan consistent with *Policy C-10.1* shall be coordinated among all appropriate private and public interests and agencies.
- C-10.3 Construction or expansion of roadways within major transportation corridors shall consider improved bike routes.
- C-10.4 The integration of bicycle systems with other public transportation modes shall be promoted.
- C-10.5 Bicycling shall be encouraged as a viable transportation mode for visitor-serving areas.
- C-10.6 Visitor-serving facilities shall be encouraged to provide adequate and secure bicycle parking facilities.

C-10.7 New and improved multi-modal transfer facilities, such as transit centers and park-and-ride lots, shall include adequate and secure bicycle parking facilities.



Author: Tim Subject: Re:snag Date: 1/2/2008 12:22:43 PM -0800

Author: Tim Subject: Note Date: 1/2/2008 12:25:34 PM -0800
New commercial office and retail development greater than 50000 sq ft which requires bike lockers, and other facilities that will encourage bicycling of employees.

Author: Tim Subject: Redesign	Date: 11/12/2008 1:05:56 PM -0700
Author: Tim Subject: Redesign	Date: 11/12/2008 1:05:52 PM -0700
Author: Tim Subject: Redesign	Date: 11/12/2008 1:05:57 PM -0700
Author: Tim Subject: Redesign	Date: 11/12/2008 1:03:39 PM -0700
Author: Tim Subject: Redesign	Date: 11/12/2008 1:05:59 PM -0700

The Conservation and Open Space Element guides the County in the long-term conservation and preservation of open space lands and natural resources while protecting private property rights. The County's intent is not to alter existing regional, State or Federal laws and regulations, but rather to enable greater cooperation among public agencies and the public to share responsibilities in accomplishing the shared goal of conserving and protecting the resources of the region.

This Element incorporates the state-mandated requirements for the Open Space and Conservation Elements and also addresses scenic resources, cultural and historic resources, and energy and mineral resources. Policies regarding natural environmental hazards, such as flooding, are addressed in the Safety Element, and recreational policies are addressed within the Public Services Element.

Among the more prominent features within Monterey County are the Santa Lucia and Gabilan Mountain Ranges, the Salinas and Carmel Valleys, and about 100 miles of coastline. Of special note are such features as the Elkhorn Slough (North County), sandy beaches of Monterey and Carmel Bays, and the rocky shores/cliffs of the Monterey Peninsula and the Big Sur coast.

Granite and metamorphic rocks form the Gabilan and Santa Lucia mountains, characterized by steep slopes and complex drainage patterns. The Salinas Valley, although underlain by granite, contains several thousand feet of sediment that have a greater seismic hazard but are the source of productive agricultural soils. Although the County contains useful minerals, the tremendous complex geology caused by extensive faulting and deformation makes investigation difficult and inconclusive.

Plants representative of almost all parts of California (except for the highest mountains and driest deserts) are found in Monterey County. Monterey is the biological center of California; many plant species that find either their northern or southern limits can be found in Monterey County. In addition, a high number of plant species are native only to Monterey County.

The County's coast offers a wide range of habitats, including sandy beaches, rocky shoreline, kelp beds, estuaries, wetlands, and sub-marine canyons. An abundance of sea life and coastal marine life off of the Monterey County coast is directly related to the variety and quality of habitat. Although a few broad policies are provided in this General Plan, most policies addressing coastal resources are included separately as part of the Local Coastal Program.

The County has recognized the need to discover and identify places of historical and cultural significance and to preserve the physical evidence of its historic past. A countywide historic preservation ordinance is implemented by the Parks Department's Historical Coordinator and Historic Resources Review Board. Policies of this ordinance stress incentives to preserve sites which have proven historical or cultural significance as part of the County's Historic Preservation Plan.

Monterey County, along with the Counties of Santa Cruz and San Benito, lies within the North Central Coast Air Basin. Air quality within this basin is monitored by the Monterey Bay Unified Air Pollution Control District (MBUAPCD). The District maintains three air

Author: Tim Subject: Note Date: 1/1/2009 1:38:08 PM -dfror
Clear the comment

Author: Tim Subject: Reschedule Date: 1/1/2009 1:38:51 PM -dfror

Author: Tim Subject: Note Date: 1/1/2009 1:38:15 PM -dfror
Why not an incentive program to encourage voluntary transfer of development away from ...? This section should also include "common public viewing areas" as one of the "land" types.

Author: Tim Subject: Note Date: 1/2/2009 12:17:31 PM -dfror
I.E. "Incentive" Programs would be the appropriate language here.

Author: Tim Subject: Reschedule Date: 1/1/2009 1:38:45 PM -dfror
I believe this is the transition between language and some policies. The ag lands exception policy can then stand on its own as a distinct provision.

Author: Tim Subject: Reschedule Date: 1/1/2009 1:38:48 PM -dfror

Author: Tim Subject: Reschedule Date: 1/1/2009 1:38:48 PM -dfror

Author: Tim Subject: Note Date: 1/1/2009 3:40:41 PM -dfror
If public trails have a recognized value in Monterey County then why is it nearly impossible under this policy to actually provide any of any value?

(e) What is the intent of segregating motorized and non-motorized trails to the County (unless they are the primary source for motorized trails)?

If ag lands program is to leave value it is going to have to rely on private lands to connect the public lands that are the primary source of trails. This policy makes that almost impossible. It also makes it almost impossible for the County to do anything to help private landowners who are subject to the same rules and easements not on ag-lands while the rest of the county do not have the reciprocal privilege of stepping in on easements that may have an impact on subject non ag-land property general public interests, the playing field needs definition and leveling.

Support changing the word "residence" to read, "residence for cooperation between public agencies and private land owners in the creation of connector trails between public properties off the development." Encouragement is mandatory.

(c) The County has already clearly stated that new public trails on private property will be voluntary OS-1.10(a). So it follows that any public trails on private land will be by voluntary means. The County has also stated that it will not fund the construction of new trails. The language here could be less hostile and more clear by maintaining internal language consistency with "Crop production and food safety guidelines shall be developed to guide the design and location of public trails and trail easements in agriculturally zoned lands." This is in outline based on the premise that there may be a private applicant owner who voluntarily supports a public trail or easement on their ag-zoned land (OS-1.10(b)). Otherwise, if the intent of the policy is to prevent agricultural lands from being used for anything other than agriculture, then the County should be more than willing to fund the construction of public trails or that easements will not be subject to agricultural zoning laws and the County should be more than willing to fund the construction of public trails or that easements on any or that owners choose their ag-land neighbor's support for a public trail or easement than that conflict is addressed in OS-1.10(c)(4).

(d) Public and private do not need to be separated here; the issue is the trail and not whether it is on public or private land. "Prohibit new trails on public or private land subject to appropriate design..."

(e) See (f), above. "The location and design of trails shall be done..."

(f) This policy needs the unity of existing commercial and residential re-development and is too vague on the agricultural issue. Suggest: "New commercial and residential development (by whatever this includes subdivisions) and existing commercial and residential re-development shall mitigate... This policy shall not apply to... any agricultural activity or operation on zoned agricultural land."

(g) This completion should also include the California Coastal Trail, all river mile-paths associated with a County or State roadway improvement project.

Author: Tim Subject: Note Date: 1/1/2009 1:37:01 PM -dfror
Insert the comma and add "and"

OS-1.7 A voluntary transfer of development rights program to direct development away from areas with unique visual or natural features, critical habitat, or prime agricultural soils shall be established.

OS-1.8 Programs to encourage clustering development in rural and agricultural areas to maximize access to infrastructure, protect prime agricultural land, and reduce impacts to designated visually sensitive and critical habitat areas shall be established.

OS-1.9 Development that protects and enhances the County's scenic qualities shall be encouraged. All routine and ongoing agricultural activities are exempt from the viewshed policies of this plan, except as noted in Policy OS-1.12.

OS-1.10 Recognizing the value of trails in Monterey County, policies to establish a trails program, including bike paths (Class 1), walking and equestrian facilities used by the general public, shall be addressed in each Area Plan within the following parameters:

- a. Public lands shall be used as the primary source for establishing non-motorized trails. Cooperation between public agencies and the public in the creation of trails is encouraged.
- b. Dedication of public trails or trail easements on private property shall be voluntary except as may be required by State Law.
- c. Crop protection and food safety of agricultural crops shall be a primary factor in disallowing trails.
- d. Potential new trails on private land or public land are subject to appropriate design including location, screening, safety, reducing potential for trespass onto private property, protection of the public health and safety, and protection of agricultural products.
- e. The location and design of trails on public or private land shall be done in consultation with affected public agencies, landowners, and other interested parties.
- f. New commercial development and residential subdivisions shall mitigate significant adverse disruption of views from common viewing points on public trails through a variety of strategies including but not limited to the use of appropriate materials, scale, lighting and siting of development. This policy shall not apply to existing residential development or to any agricultural activity or operation.
- g. The design and development of the Monterey Bay Sanctuary/Scenic Trail is exempt from this policy.

OS-1.11 Maintain GIS mapping for all lands containing visually sensitive resources and corridors. Mapped information shall be reanalyzed and updated at least every five (5) years, as necessary.

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Author: Tim Subject: Rectangle Date: 1/12/09 3:25:08 PM -0800

Author: Tim Subject: Note Date: 1/12/09 3:29:55 PM -0800
This should be reserved for the "Visually Similarity Reservoir GIS map."

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Reserved for Figure 7
~~NO MAP AT THIS TIME~~

OS-1.1.2 The significant disruption of views from designated scenic resources shall be mitigated through use of appropriate scale, lighting and siting of development. Routine and On-going Agricultural Activities shall be exempt from this policy, except:

1. large-scale agricultural processing facilities, or
2. facilities governed by the Agricultural Winery Corridor Plan

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Author: Tim Subject: Redesign Date: 11/20/09 3:24:52 PM -0800

Author: Tim Subject: None Date: 1/22/09 10:54:58 AM -0800
 This is primarily independent and should read as, "The significant disruption of views from common public viewing areas shall be mitigated."
 The County should include criteria such as a certain duration percent of view based on a baseline view from known "common public viewing areas". Subsequent visual analysis can then easily compute a percent impact to view and measure it against whatever threshold is established for "significant". This will give the County an objective criteria to measure against.

The second sentence should be more specific: "Routine activities on agriculturally zoned land shall be exempt."
 (1) Large-scale should be defined perhaps by square footage or percent land cover or some other measurable criteria and not left so vague.

Author: Tim Subject: None Date: 11/20/09 3:25:57 PM -0800

Author: Tim Subject: None Date: 11/20/09 3:26:03 PM -0800

Author: Tim Subject: None Date: 1/22/09 10:55:03 AM -0800

Author: Tim Subject: None Date: 1/22/09 10:57:14 AM -0800

MINERAL RESOURCES

GOAL OS-2

PROVIDE FOR THE CONSERVATION, UTILIZATION, AND DEVELOPMENT OF THE COUNTY'S MINERAL RESOURCES.

Policies

- OS-2.1** Potentially significant mineral deposits and existing mining operations identified through the State Division of Mines and Geology, including idle and reserve properties, shall be protected from on-site and off-site land uses that would be incompatible with mineral extraction activities.
- OS-2.2** Mineral extraction operations shall be in keeping with sound conservation practices consistent with the Surface Mining and Reclamation Act (SMARA) and other applicable standards and adequate financial security shall be required to insure reclamation of the extraction site to a condition consistent with the surrounding natural landscape and environmental setting.
- OS-2.3** Efforts to conserve raw mineral resources through recycling shall be supported.
- OS-2.4** Lands containing known valuable mineral deposits shall be mapped in the County GIS system. Mapped information shall be updated as needed.
- OS-2.5** The County shall inventory, assess, and characterize the location and condition of identified pre-SMARA abandoned gold, mercury and coal mines and implement such measures as may be necessary to ensure that such mines do not contribute to a significant risk to public health or safety or non-compliance with water quality standards and criteria.

SOILS

GOAL OS-3

PREVENT SOIL EROSION TO CONSERVE SOILS AND ENHANCE WATER QUALITY

CARMEL VALLEY MASTER PLAN
SUPPLEMENTAL POLICIES

1.0 - Land Use

- CV-1.1 Policies relative to the Carmel Valley Area are intended to retain a rural character.
- CV-1.2 When an ownership is covered by two or more land use designations, the total allowable development should be permitted to be located on the most appropriate portion of the property.

CV-1.3 Open space uses shall be located between the development areas in order to clearly define them and maintain a distinction between the more rural and more suburban areas of the valley. Small and large open space areas should be created with preference given to those that add open space to existing open space areas.

CV-1.4 Existing higher intensity residential and recreational uses in the Valley are intended to be recognized by this Plan.

CV-1.5 In the residential areas, maximum densities are as shown on the Carmel Valley Master Plan Land Use Map. However, attainment of maximum density in these areas is dependent upon conformity of the proposed project to plan goals and policies.

CV-1.6 New residential subdivision in Carmel Valley shall be limited to creation of 266 new lots with preference to projects including at least 50% affordable housing units. The County shall develop a tracking system and shall present an annual report before the Planning Commission.

CV-1.7 Subdivision for conservation purposes which is in the public interest is exempt from any quota and allocation system where such subdivision does not create additional residential building sites. It is preferable that parcels thus created shall be owned by an appropriate public entity or a non-profit public benefit corporation.

- CV-1.8 Cluster development:
 - a. must meet the objectives of the Master Plan.
 - b. shall be used to protect visible open space in sensitive visual areas or to protect natural resources.
 - c. Clustering adjacent to vertical forms, although preferable to development in open spaces, will be considered in light of the visual sensitivity of the building site.
 - d. should be consistent with wastewater application rates of the Carmel Valley Wastewater Study that generally would require clustering of five units or less on a minimum of five acres of land.

- e. may be permitted only where it will result in the preservation of visible open space and is in compliance with other applicable policies.
- f. Open space for clustered developments shall be dedicated in perpetuity.

CV-1.9 Structures proposed in open grassland areas that would be highly visible from Carmel Valley Road and Laureles Grade shall be minimized in number and be clustered near existing natural or man-made vertical features.

CV-1.10 The Val Verde Drive area is planned for residential use at a basic density of one (1) unit per acre. With suitable clustering, up to two (2) units per acre may be allowed. However, a density of up to four (4) units per acre may be allowed provided that 25% of the units are developed for individuals of low and moderate income or for workforce housing. This policy is intended to be independent from *Policy CV-1.11*, and not counted in conjunction with the density bonus identified in that policy.

CV-1.11 Projects for low or moderate income family housing shall be exempt from any annual allocation provisions, but shall be subtracted from the 20-year buildout quota on a basis of one such unit reducing the remaining buildout by one unit. Projects for senior citizens of low or moderate income may have up to twice the number of units normally allowed on a site. Such increased density shall only be allowed where it is determined to be feasible and consistent with other plan policies. Such projects shall be subtracted from the 20-year buildout quota on a basis of two such units reducing the remaining buildout by one unit.

CV-1.12 Areas designated for commercial development in the valley shall:

- a. be placed in design control overlay districts ("D")
- b. have planted landscaping covering no less than 10% of the site, and
- c. provide adequate parking.

CV-1.13 To preserve the character of the village, commercially designated lots in Carmel Valley shall not be used for exclusive residential purposes.

CV-1.14 Provision should be made for service centers in Carmel Valley. They shall be limited to urbanized areas such as the mouth of the Valley, Carmel Valley Village or mid-Valley area. Sites shall meet the following criteria:

- a. Low visibility
- b. Safe and unobtrusive access away from pedestrian traffic areas
- c. Low noise impact on surrounding uses
- d. Conform to all other Plan requirements

Service centers shall be limited to those enterprises which provide services and facilities for persons engaged in the construction, maintenance and repair trades and not allow enterprises whose chief business is on-site retail sales.

Author: Tim Subject: Rezoning Date: 1/22/09 4:00:20 PM -0800
Author: Tim Subject: Note Date: 1/22/09 10:50:12 AM -0800
(6) not to be published on Public/Quarry-Public zoned lands.

- CV-1.15 Visitor accommodation uses shall follow the following guidelines:
 - a. Expansion of existing hotels, motels and lodges should be favored over the development of new projects.
 - b. Visitor accommodation projects must be designed so that they respect the privacy and rural residential character of adjoining properties.
 - c. Bed and breakfast facilities shall be counted as visitor accommodation units and be limited to a maximum of five (5) units clustered on five (5) acres in accord with Monterey County Code Section 15.20.060.M unless sewerred by public sewers.

- CV-1.16 Applications for service and special use facilities (including in Carmel Valley, Hidden Valley Music Seminars), as defined by the General Plan, are to be considered on their merits and shall not automatically be deemed inconsistent with the Plan. They must, however, conform to all applicable plan policies.

- CV-1.17 Publicly used buildings and areas should be encouraged to be oriented to views of the river.

- CV-1.18 Facilities classified as either Public/Quarry-Public or Special Use (such as schools, churches, hospitals, convalescent homes, rehabilitation centers, hospice facilities, emergency facilities and public facilities such as community halls) may be considered in any land use category provided that they meet the following criteria:
 - a. Low visibility
 - b. Safe and unobtrusive access away from pedestrian traffic areas.
 - c. Low noise impact on surrounding uses.
 - d. Development should follow a rural architectural theme with design review.
 - e. Conform to all other Plan requirements.

- CV-1.19 Mines or quarries shall:
 - a. be screened from public view by use of natural terrain, vegetation, or artificial screening compatible with the environment;
 - b. have safe and unobtrusive access;
 - c. minimize noise impact on surrounding areas; and
 - d. conform to all other Plan requirements except the restriction on development on slopes over 30% within the limits of quarry operations.

- CV-1.20 Design ("D") and site control ("S") overlay district designations shall be applied to the Carmel Valley area. Design review for all new development throughout the Valley, including proposals for existing lots of record, utilities, heavy commercial and visitor accommodations but excluding minor additions to existing development where those changes are not conspicuous from outside of the property shall consider the following guidelines:
 - a. Proposed development encourages and furthers the letter and spirit of the Master Plan.

Author: The Budget Note Date: 1/12/09 4:02:43 PM -0909
 Drawn by: ellg
 Author: The Subject Note Date: 1/22/09 12:28:06 PM -0909
 Drawn by: ellg

- b. Development either shall be visually compatible with the character of the valley and immediate surrounding areas or shall enhance the quality of areas that have been degraded by existing development.
- c. Materials and colors used in construction shall be selected for compatibility with the structural system of the building and with the appearance of the building's natural and man-made surroundings. Structures should be controlled in height and bulk in order to retain an appropriate scale.
- e. Development, including road cuts as well as structures, should be located in a manner that minimizes disruption of views from existing homes.
- f. Minimize erosion and/or modification of landforms.
- g. Minimize grading through the use of step and pole foundations.

CV-1.21

- Commercial projects shall meet the following guidelines:
- a. Buildings shall be limited to 35 feet in height and shall have mechanical apparatus adequately screened, especially on the roofs.
 - b. Commercial projects shall include landscaping that incorporates large-growing street trees. Parking areas shall be screened with exclusive use of native plants or compatible plant materials. Land sculpturing should be used where appropriate.

CV-1.22

Special Treatment Area: Carmel Valley Ranch – The Carmel Valley Ranch shall be designated as a "Special Treatment Area." The Amended Carmel Valley Ranch Specific Plan, dated 11/3/76, is incorporated by reference into this Plan and the provisions of this Specific Plan shall continue to apply. However, attainment of densities authorized by this Specific Plan is dependent upon conditions existing at the time each future improvement of development is sought and is further dependent upon conformity with the Specific Plan Amended Conditions of Approval as well as the goals and policies of this General Plan, whichever is most restrictive. Any amendment of the Specific Plan must be consistent with the policies and provisions of this General Plan. APNs 416-522-020-000 and 416-522-017-000.

CV-1.23

Special Treatment Area: Condom/Chugach Property – The Condom/Chugach property shall be designated as a Special Treatment Area. In recognition of the unique circumstances of the property, including the past gift conveyances of several hundred acres to Garland Park, the Condom/Chugach property shall be allowed to be subdivided into four parcels consistent with the 2004 Subdivision Ordinance Standards. (approximately 51 acres; APN's 189-111-022 and 189-111-024)

CV-1.24

The property located between the end of Center Street and north of the Carmel River within the mid-valley area shall be retained as one building site (APN: 169-131-024, 169-131-025).

- Author: Tim Subject: Note Date: 1/22/2008 12:28:25 PM -0500
CV-1.26; Rancho Treatment Area; Rancho Treatment Area; Special Treatment Area; status for General Ranch Regional Park; Monterey Peninsula Regional Park District would like to discuss "Special Treatment Area" status for General Ranch Regional Park.
- Author: Tim Subject: Re: Rancho Treatment Area; Rancho Treatment Area; Special Treatment Area; status for General Ranch Regional Park; Monterey Peninsula Regional Park District would like to discuss "Special Treatment Area" status for General Ranch Regional Park. Date: 1/22/2008 4:05:48 PM -0500
- Author: Tim Subject: Note Date: 1/22/2008 4:11:58 PM -0500
Title need to be addressed in this section.
- Author: Tim Subject: Re: Rancho Treatment Area; Rancho Treatment Area; Special Treatment Area; status for General Ranch Regional Park; Monterey Peninsula Regional Park District would like to discuss "Special Treatment Area" status for General Ranch Regional Park. Date: 1/22/2008 4:10:35 PM -0500

CV-1.25 Special Treatment Area: Rancho San Carlos - Residential development is permitted on the portions of the Santa Lucia Preserve (formerly Rancho San Carlos) within the Greater Monterey Peninsula Planning Area, and shall follow densities and policies as specified in Board of Supervisor Resolution No. 93-115, "Comprehensive Planned Use" Overlay for Rancho San Carlos and the Comprehensive Development Plan for the Santa Lucia Preserve (See also Policy GMP-1.6).

CV-1.26 Study Area: Gardiner/Tennis Club - The County shall establish a study area near the Carmel Valley Village where there is a mix of visitor serving uses. A Study will be performed to evaluate the potential for development in light of the environmental conditions of the area (traffic, water quantity, water quality, wastewater disposal). If deemed appropriate and resource constraints have been resolved, the County may establish a Special Treatment Area and adopt specific land use policies that would apply to new development. (APNs: 189-121-001-000, 189-201-003-000, 189-201-013-000, 189-251-014-000, 189-251-015-000, 189-251-016-000, 189-252-002-000, 189-261-001-000, 189-261-005-000, 189-261-006-000, 189-261-009-000, 189-261-010-000, 189-261-011-000, 189-261-012-000, 189-261-013-000, 189-261-015-000, 189-261-016-000, and 189-261-017-000).

CV-1.27 Special Treatment Area: Rancho Canada Village - Approximately 40 acres consisting of properties located generally between Val Verde Drive and the Rancho Canada Golf Course clubhouse, from the Carmel River to Carmel Valley Road, excluding portions of properties in floodplain shall be designated as a Special Treatment Area. Residential development may be allowed with a density of up to 10 units/acre in this area and shall provide a minimum of 50% Affordable/Workforce Housing. Prior to beginning new residential development (excluding the first unit on an existing lot of record), projects must address environmental resource constraints (e.g., water, traffic, flooding). (APN: 015-162-017-000, 015-162-025-000, 015-162-026-000, 015-162-039-000 and 015-162-040-000)

2.0 - Circulation

CV-2.1 Public transit should be explored as an alternative to the use of private automobiles and to help preserve air quality. Whenever feasible all new development shall include a road system adequate not only for its internally generated automobile traffic but also for bus (both transit and school), pedestrian, and bicycle traffic, which should logically pass through or be generated by the development.

CV-2.2 Consideration should be given to locating a County road and utility maintenance facility in the Carmel Valley area. Such facility would provide for storage of equipment as well as materials.


Author: Tim Subject: Redwings Date: 1/12/2009 4:13:45 PM -0800

Author: Tim Subject: Hills Date: 1/22/2009 12:31:58 PM -0800
X minimum setback of 700 feet shall be established for all properties abutting Carmel Valley Road. A minimum setback of 1000 feet shall be established for all properties abutting Carmel Valley Road. An exception may be granted for...


Author: Tim Subject: Redwings Date: 1/12/2009 4:12:57 PM -0800

Author: Tim Subject: Hills Date: 1/12/2009 4:13:20 PM -0800
Escalante

3.0 - Conservation/Open Space

CV-3.1  A minimum setback of 100 feet shall be established for all properties abutting Carmel Valley Road. An exception may be granted in cases where:
a. an existing structure permitted for construction prior to adoption of the original Carmel Valley Master Plan (December 16, 1986) would become non-conforming, or
b. implementation would render an existing lot-of-record unbuildable.

CV-3.2 Public vista areas shall be provided and improved.

CV-3.3  Development (including buildings, fences, signs and landscaping) shall not be allowed to significantly block views of the viewshed, the river or the distant hills as seen from key public viewing areas such as Garland Ranch Regional Park, along Carmel Valley Road, and along Laureles Grade Road. This policy applies to commercial and private parcels including existing lots of record. Removal of existing solid fences and rows of Monterey Pine trees which block views of the river and the mountains shall be encouraged.

CV-3.4 Alteration of hillsides and natural landforms caused by cutting, filling, grading or vegetation removal shall be minimized through sensitive siting and design of all improvements and maximum feasible restoration including botanically appropriate landscaping. Where cut and fill is unavoidable on steep slopes, disturbed areas shall be revegetated.

CV-3.5 Signs should be low-key and shall not be allowed to block views, cause visual clutter, or detract from the natural beauty. Commercial signs shall not be constructed of plastic or be internally lighted. Neon signs shall not be permitted where visible from the street.

CV-3.6 No off-site outdoor advertising is allowed in the Plan area.

CV-3.7 Areas of biological significance shall be identified and preserved as open space. These include, but are not limited to:
a. The redwood community of Robinson Canyon;
b. The riparian community and redwood community of Garzas Creek;
c. All wetlands, including marshes, seeps and springs (restricted occurrence, sensitivity, outstanding wildlife value).
d. Native bunchgrass stands and natural meadows (restricted occurrence and sensitivity)
e. Cliffs, rock outcrops and unusual geologic substrates (restricted occurrence).
f. Ridgelines and wildlife migration routes (wildlife value).
When a parcel cannot be developed because of this policy, a low-density, clustered development (but no subdivision) may be approved on those portions of

Author: Tom Subject: Rectangle Date: 1/1/2009 4:20:12 PM .dft07

Author: Tom Subject: Note Date: 1/1/2009 4:23:22 PM .dft07

Public and ... Monterey Peninsula Regional Park District... may acquire ... Biological, agricultural, land, or other...

CV-3.12 Open space areas should include a diversity of habitats with special protection given to areas where one habitat grades into another (these ecotones are ecologically important zones) and areas used by wildlife for access routes to water or feeding grounds.

CV-3.13 Historic and Archaeological Resources, including buildings and sites of historical significance, located in Carmel Valley shall:
a. be reviewed on a site by site basis.
b. be rezoned to the "HR" District as a condition of permit approval for any development impacting such sites.
c. require preservation of the integrity of historic sites and/or structures.
A committee to evaluate the current condition of each and recommend deletions, additions or other measures shall be drawn from members of local historical, architectural, and/or educational societies as determined by the Planning Commission.

CV-3.14 Wherever possible a network of shortcut trails and bike paths should interconnect neighborhoods, developments and roads. These should be closed to motor vehicles and their intent is to facilitate movement within the Valley without the use of automobiles.

CV-3.15 Public and private agencies such as the Big Sur Land Trust, the Monterey Regional Park District and others may acquire development rights and/or accept easements and dedications for significant areas of biological, agricultural or other open space land.

CV-3.16 Lighting for outdoor sports shall not be allowed where it would be visible from off-site.

CV-3.17 Street lighting shall be designed to promote traffic safety and be unobtrusive and harmonious with the local character. Such lighting must be constructed and located to illuminate only the intended area and prevent off-site glare.

CV-3.18 Except where inconsistent with sound environmental planning, new aboveground transmission facilities shall incorporate the following design guidelines:
a. follow the least visible route (e.g., canyons, tree rows, and ravines),
b. cross ridgelines at the most visually unobtrusive locations,
c. follow, not compete with, either natural features of the terrain or man-made features in developed areas,
d. Create a simple and unobtrusive in appearance,
e. minimize the bulk of structures,
f. use the minimum number of elements permitted by good engineering practice, and
g. incorporate colors and materials compatible with local surroundings.

CV-3.1.9 As development of bike paths and a coordinated, area-wide trails system are essential for circulation, safety and recreation in the Carmel Valley Planning Area, dedication of trail easements may be required as a condition of development approval, notwithstanding *Policy OS-1.10(b)*.

4.0 - Safety

- CV-4.1 In order to reduce potential erosion or rapid runoff:
 - a. The amount of land cleared at any one time shall be limited to the area that can be developed during one construction season.
 - b. Motorized vehicles shall be prohibited on the banks or in the bed of the Carmel River, except by permit from the Water Management District or Monterey County.
 - c. Native vegetative cover must be maintained on areas that have the following combination of soils and slope:
 1. Santa Lucia shaly clay loam, 30-50% slope (SIF)
 2. Santa Lucia-Reliz Association, 30-75% slope (SG)
 3. Cienega fine gravelly sandy loam, 30-70% slope (C&G)
 4. San Andreas fine sandy loam, 30-75% slope (S&G)
 5. Sheridan coarse sandy loam, 30-75% slope (SoG)
 6. Junipero-Sur complex, 50-85% slope (Je)

CV-4.2 A comprehensive drainage maintenance program should be established by either sub-basins or valley-wide watershed zones.

CV-4.3 In addition to required on-site improvements for development projects, a fee shall be imposed to help finance the improvement and maintenance of the drainage facilities identified in the Master Drainage Plan for Carmel Valley.

CV-4.4 The County shall require emergency road connections as necessary to provide controlled emergency access as determined by appropriate emergency service agencies (Fire Department, OES). The County shall coordinate with the emergency service agencies to periodically update the list of such connections.

5.0 - Public Services

CV-5.1 Pumping from the Carmel River aquifer shall be managed in a manner consistent with the Carmel River Management Program. All beneficial uses of the total water resources of the Carmel River and its tributaries shall be considered and provided for in planning decisions.

CV-5.2 Water projects designed to address future growth in the Carmel Valley may be supported.

CV-5.3 Development shall incorporate designs with water reclamation, conservation, and new source production in order to:

Author: Tim Subject: Note
 Date: 11/16/2006 4:56:02 PM .JPG*
 (R) Establish a network of policy, strategy, and working trails that interconnect the religious, educational facilities, neighborhoods, and conservation lands.

Author: Tim Subject: Rectangle
 Date: 11/16/2006 4:52:21 PM .JPG*

**COUNTY OF MONTEREY
 FORT ORD MASTER PLAN
 LAND USE ELEMENT**

The Fort Ord Land Use Element is part of the Greater Monterey Peninsula Area Plan and the Monterey County General Plan and consists of those portions of the County of Monterey Land Use Concept (Figure 1) adopted by the Fort Ord Reuse Authority (FORA) on June 13, 1997, that pertain to the areas of Fort Ord currently under the jurisdiction of the County and located east of Highway 1, and includes the following text. The Land Use Element contains land use designations specific to Fort Ord. These land use designations are consistent with the land use designations (as base designations) included in the adopted FORA Reuse Plan. For each of the Planning Districts, overlay designations are included that provide additional description and clarification of the intended land uses and additional design objectives for that specific Planning District. The Fort Ord land use designations also include the applicable land use Goals, Objectives, Policies and Programs directly from the Reuse Plan. These will constitute all the policies and programs to be applied to the Fort Ord Land Use Element. Background information, land use framework and context discussions, as they relate to the subject area are hereby incorporated by reference into the Fort Ord Land Use Element from the FORA adopted Reuse Plan. In addition, the Land Use Map contained in this plan is the County of Monterey Land Use Concept (Figure 1) adopted by FORA into the Reuse Plan.

Land Use Goal: Promote orderly, well-planned, and balanced development to ensure educational, housing and economic opportunities as well as environmental protection.

Design Principals:

1. Create a unique identity for the community around the educational institutions.
2. Reinforce the natural landscape setting consistent with the Monterey Peninsula character.
3. Establish a mixed-use development pattern with villages as focal points.
4. Establish diverse neighborhoods as the building blocks of the community.
5. Encourage sustainable practices and environmental conservation.
6. Support the adoption of Regional Urban Design Guidelines by FORA.
7. Create an appropriate range of housing types attainable to the residents and workers of Monterey County.

Author: The Subject Matter
 Date: 1/15/2008 10:45:17 AM -0800
 Title: 2007 General Plan
 Author: The Subject Matter
 Date: 1/15/2008 10:45:17 AM -0800

Business Park/Light Industrial. The Business Park/Light Industrial Base Designation allows business parks, light industrial uses, professional office, research and development uses, convenience retail, and food service establishments. Commercial recreation and visitor serving uses are allowed as designated in the overlay designations.

Visitor Serving. The Visitor Serving Base Designation allows hotels and resorts, conference centers, restaurants, commercial recreation, and retail support uses.

Open Space/Recreation. The Open Space Recreation Base Designation allows public parks and recreation activities not prohibited by overlay designations, habitat management, public amphitheaters, environmental education facilities, and commercial recreation. Convenience retail is allowed as designated in the overlay designations.

Habitat Management. The Habitat Management Base Designation allows habitat management, ecological restoration, environmental educational activities and facilities, and passive recreational activities, such as hiking, bike riding, horse riding, and picnicking in accordance with adopted habitat plans.

School/University. The School/University Base Designation allows public primary and higher educational facilities, habitat management, environmental education and support uses such as offices, sport facilities, maintenance uses, university housing, and convenience retail.

Public Facility/Institutional. The Public Facility/Institutional Base Designation allows facilities having public institutional ownership or benefit. Such uses may include habitat management, light industrial and R&D, corporation and maintenance yards, public utilities, training grounds, offices, educational facilities, and youth camps.

Military Enclave. The Military Enclave Base Designation is for lands retained by the United States armed forces for on-going military-related activities.

DESCRIPTION OF PLANNING AREAS AND OVERLAY PLANNING DISTRICTS

The following descriptions of the Planning Areas and Planning Districts are compatible with and consistent with those contained in the adopted Reuse Plan. The location and boundaries of the Planning Areas and Planning Districts are found in Figure 2. In some cases the descriptions of future development have been simplified and clarified, particularly if a Planning District is subject to a Master Plan or Habitat Plan to be adopted and implemented by another agency. In addition, General Development Character and Design Objectives from the adopted Reuse Plan have been supplemented for the East Garrison, University Corporate Center, and Parker Flats Planning Districts to provide a more refined development vision for those areas as guidance in preparing the required Specific Plans or other appropriate planned development mechanism.

**TORO AREA PLAN
SUPPLEMENTAL POLICIES**

L.0 - Land Use

- T-1.1 Development proposals on Corral de Tierra Road from "Four Corners" to Corral del Cielo shall complete safety improvements concurrently with development.
- T-1.2 Industrial land uses other than utilities shall not be permitted in the Toro area.
- T-1.3 The designated agricultural lands as shown on the Toro Area Plan Land Use Map (Figure LU1(f)) shall be conserved and, where feasible, expanded.
- T-1.4 **Special Treatment Area: Greco** - The Greco property on River Road across from the Indian Springs Ranch Subdivision shall be designated as a "special treatment" area to be zoned Heavy Commercial. Although the use of the property for the removal of sand and gravel ceased in the year 2000, use of the property for a contractor's yard, shop, and residence may continue pursuant to PLN980448 as approved August 29, 2001 or as that permit may be amended or extended. (APN: 139-021-005-000)

- T-1.5 Subdivision shall be designed so that new lots have building sites located outside of the critical viewshed.
- T-1.6 Existing legal lots of record located in the critical viewshed may transfer density from the acreage within the critical viewshed to other contiguous portions of land under the same ownership, provided the resulting development meets all other Toro Area and General Plan policies.

- T-1.7 Development on properties with residential land use designations located within the Toro Area Plan along the Highway 68 corridor shall be limited to the first single family home on a legal lot of record. The County shall conduct a comprehensive review of infrastructure constraints regarding circulation, wastewater, and water supply. Said restriction shall not apply to development within adopted Community Areas, Rural Centers, or Affordable Housing Overlays.

2.0 - Circulation

- T-2.1 Employers in surrounding areas should be encouraged to stagger employees' work hours in order to ease peak hour traffic congestion on Highway 68 and in other areas.
- T-2.2 Davis and Reservation Roads shall be encouraged as alternate routes between the Monterey Peninsula and Salinas to alleviate traffic on Highway 68.

Author: Tim Subject: Note
 Date: 1/1/2008 5:14:32 PM -0800
 Needs to address community recreational and connectivity needs here. Also, bicycle paths and side-paths, especially along the Hwy 68 corridor (and proposed new highway).
 Llamas Grada and Corral de Tierra/San Francisco need to be added here.

Author: Tim Subject: Redesign
 Date: 1/1/2008 5:08:46 PM -0800

Author: Tim Subject: Neatly Date: 1/12/2008 5:16:02 PM -0600
 Author: Tim Subject: Note Date: 1/12/2008 5:16:00 PM -0600
 Portions: Except for driveway, pedestrian walkways, and other paths...
 Author: Tim Subject: Restraints Date: 1/12/2008 5:16:24 PM -0600
 Author: Tim Subject: Note Date: 1/12/2008 5:22:59 PM -0600
 Large acreages... shall be preserved and enhanced for grazing, where grazing is found to be a viable use. *Minimum setbacks are not automatically visible but restrictions apply.*
 Restraints for combination with public easements and/or visible land combinations must be established for each parcel. *Restrictions apply for the Dept.*

T-3.2 Land use, architectural, and landscaping controls shall be applied and sensitive site design encouraged to preserve Toro's visually sensitive areas and scenic entrances:
 a. River Road/Highway 68 intersection; and
 b. Laureles Grade scenic vista overlooking the Planning Area.

T-3.3 ~~Portions of County and State designated scenic routes shall be designated as critical viewshed as shown on the Toro Visual Sensitivity Map. Except for driveways, pedestrian walkways and paths, a 100-foot building setback shall be required on all lots adjacent to these routes to provide open space and landscape buffers. This setback may be reduced for existing lots of record that have no developable area outside the setback and to accommodate additions to existing structures that become non-conforming due to this policy. New development shall dedicate open space easements over set back areas established by this policy.~~

T-3.4 Placement of existing utility lines underground shall be encouraged, particularly along Laureles Grade Road, Copal de Tierra, San Benancio, River Road, and Highway 68.

T-3.5 Exterior/Outdoor lighting shall be located, designed and enforced to minimize light sources and preserve the quality of darkness. Street lighting shall be as unobtrusive as practicable and shall be consistent in intensity throughout the Toro area.

T-3.6 Large acreages in higher elevations and on steeper slopes shall be preserved and enhanced for grazing, where grazing is found to be a viable use.

T-3.7 The preservation of oak trees within Toro Area Plan shall be promoted by discouraging removal of healthy trees with diameters in excess of 6-inches d.b.h.

4.0 - Safety

T-4.1 Land uses and practices that may contribute to significant increases of siltation, erosion, and flooding in the Toro area shall be prohibited.

5.0 - Public Services

T-5.1 To ensure cost-effective and adequate levels of wastewater treatment, the County shall promote relatively higher densities in areas where wastewater treatment facilities can be made available.

6.0 - Agriculture

No supplemental Agricultural policies at this time.

Author: Tim Subject: Reampl Date: 1/1/2009 4:28:44 PM -08'00'

Author: Tim Subject: Note Is this consistent with the intent and purpose of the original legislation? Is the double-dipping into the median? Date: 1/1/2009 4:28:43 PM -08'00'

Author: Tim Subject: Reampl Date: 1/1/2009 4:28:25 PM -08'00'

Author: Tim Subject: Note Open space, ...are not appropriate and compatible. Date: 1/1/2009 4:31:08 PM -08'00'

**GREATER MONTEREY PENINSULA AREA PLAN
SUPPLEMENTAL POLICIES**

1.0 - Land Use

The County shall overlay properties north and south of Highway 68 and west of Laures Grade with a Visually Sensitive District ("VSD") and/or other appropriate zoning designation to regulate the location, height and design of structures within this unique scenic corridor.

GMP-1.1

GMP-1.2 The undeveloped portion of *High Meadow I* (APNs: 015-451 to 045 and APNs: 015-461-001 to 017) shall receive density credit for the open space originally dedicated as part of the entire *High Meadow I* development approval not to exceed a total of 18 units.

GMP-1.3 Bed and breakfast uses may be considered in any land use category provided that such use is compatible with existing land uses in the area.

GMP-1.4

Development proposals should include compatible open space uses located between other developed areas in order to maintain a rural atmosphere and to protect scenic resources.

GMP-1.5

Open space, low intensity educational and recreational uses should be considered to be appropriate and compatible land uses in environmentally sensitive areas and areas of high visual sensitivity.

GMP-1.6

Special Treatment Area: Rancho San Carlos - Residential development is permitted on the portions of the Santa Lucia Preserve (formerly Rancho San Carlos) within the Greater Monterey Peninsula Planning Area, and shall follow densities and policies as specified in Board of Supervisor Resolution No. 93-115, "Comprehensive Planned Use" Overlay for Rancho San Carlos and the Comprehensive Development Plan for the Santa Lucia Preserve (See also *Policy CV-1.25*).

GMP-1.7

Special Treatment Area: White Rock Club - The White Rock Club shall be designated as a "Special Treatment Area." The following specific policies shall regulate uses within the White Rock Club Special Treatment Area. Development shall be subject to the policies of the Rural Grazing land use designation. (APN: 417-041-014-000)

- a. The existing recreational facilities, consisting of 100 cabin sites and one gatehouse, allows the construction and remodeling of the existing 100 cabin sites. No additional cabin sites shall be allowed.
- b. Conversion of the cabins to permanent residential units shall not be permitted. The purpose of the cabins is transient recreational use, however, no more than eight of the 100 cabin sites may be occupied year round for the maintenance and operations of White Rock Club.

Author: Tim Subject: None Date: 1/2/2008 1:51:16 AM -0800
 The Print Label used the special character 'x' which caused the printer to print garbage when the label reads.
 Author: Tim Subject: Meetings Date: 1/1/2008 4:32:51 PM -0800

c. Further expansion of accessory uses at White Rock Club may be granted upon approval of a Use Permit. The Use Permit shall conform to the policies of the Rural Grazing land use designation.

GMP-1.8

Special Treatment Area: San Clemente Ranch-- The San Clemente Ranch shall be designated as a "Special Treatment Area." The following specific policies shall regulate uses within the San Clemente Ranch Special Treatment Area. Development shall be subject to the policies for the Rural Grazing land use designation.

- a. The existing recreational facilities, consisting of 101 cabin sites, 5 permanent residents, tennis courts, swimming pool and fishing ponds are allowed/uses. No additional cabin sites shall be allowed. Cabin sites may be moved only with consent of the Hearing Officer subject to consistency with the policies of this Plan. The reconstruction, remodeling or rebuilding of approved cabins or development of new cabins on approved cabin sites shall be allowed, with appropriate Planning and Building Inspection Department and Health Department permits.
- b. Further expansion of accessory uses, not including cabins, is subject to the requirements of Rural Grazing land use designation.
- c. Conversion of the 101 cabins to permanent residential units shall not be permitted. The use of the cabins shall remain a recreational use, and occupancy shall be limited to no more than 45 consecutive days.
- d. Agricultural uses on the property shall be allowed.

GMP-1.9

Special Treatment Area: Jefferson: Residential development shall be permitted at the maximum equivalent density of 2.5 acres per unit on 40 acres (16 units total) in order to contribute to meeting the affordable housing goals on the peninsula (APN: 175-011-047-000, 175-011-029-000, 414-014-014-000). The following specific policies shall regulate uses within the Jefferson Special Treatment Area:

- a. Development shall meet minimum setback requirements and provide adequate buffers from the Marina landfill.
- b. Development shall meet all requirements of the Marina Airport Comprehensive Land Use Plan (CLUP) and letter from the Airport Land Use Commission (ALUC) to the Board of Supervisors dated December 20, 2006. Proposed development shall be considered by the ALUC prior to approval.
- c. A minimum of 50-percent (50%) of the units developed on this site shall meet Affordable/Workforce Housing criteria.
- d. Future development will address environmental constraints.
- e. Development may occur on the bluffs above the Salinas Valley floor. No new residential development may occur on prime valley farmland. (also see Policy 6.5.1.2)



Author: Tim Subject: Note Date: 1/12/2009 4:35:43 PM -0800
Title and side-paths need to be addressed here.
Author: Tim Subject: Re:znhyg Date: 1/12/2009 4:24:48 PM -0800

2.0 - Circulation

GMP-2.1 Improvement of Highway 68 intersections, construction of alternate passing lanes, public transit roadway improvements, and improved bicycle safety measures shall be given priority for funding.

GMP-2.2 Employers should stagger employee work hours in order to ease peak hour traffic congestion on Highway 68 and in other areas.

GMP-2.3 Improvements to Launelles Grade should consist of the construction of shoulder widening, spot realignments, passing lanes and/or paved turn-outs. Heavy vehicles should be discouraged from using this route.

GMP-2.4 To minimize traffic safety hazards, creation of new direct access points from single-family residences onto Highway 68 or Launelles Grade shall be prohibited, unless there is no other feasible access.

GMP-2.5 The County shall promote the use of Davis and Reservation Roads as alternate routes between the Monterey Peninsula and Salinas to alleviate traffic on Highway 68.

GMP-2.6 State Scenic Highway designation should be pursued for Highway 1 north of the Highway 68 junction, and County Scenic Route designations should be pursued for Carmel Valley Road, Robinson Canyon Road and Reservation Road.

GMP-2.7 New sites for office employment, services, and local conveniences should incorporate designs and be located to allow use of alternate modes of transportation such as public transit buses, bicycles and walking. Features to encourage the use of public transit should include a road system sufficient to allow reasonable access by transit buses and should also include provision for bus pullouts, bus stops, pedestrian access, wheel chair access, transit information signs and passenger shelters.

GMP-2.8 Development directly beneath runway approaches of the Monterey Peninsula Airport and Marina Municipal Airport shall:
a. be of low intensity,
b. not generate electrical interference to radio communication between pilots and the air traffic control tower,
c. not contain sources of glare which would blind or confuse pilots and, and
d. be required to grant aviation easements to the Monterey Peninsula Airport District or other appropriate entity as a condition of development approval.

Author: Tim Scajda; Map Date: 11/12/2009 4:12:58 PM; Jdrcv
The County shall... of Visually Impacted Scenic Resources Planning Study
Author: Tim Scajda; Recharge Date: 11/12/2009 4:37:59 PM; Jdrcv

GMP-2.9 Construction and expansion of all highways and major arterials should provide for bike paths. It is desirable that bike paths be physically separate from motorized traffic.

GMP-2.10 Work with the United States Coast Guard to assure that sea lanes for tanker traffic off the Monterey County coast are well outside the three-mile limit in order to protect the entire shoreline from possible spills or coincidental pumping of bilges.

3.0 - Conservation/Open Space

GMP-3.1 The County shall encourage creative public and private efforts to restore the scenic beauty of visually impacted areas.

GMP-3.2 Development on canyon edges and hilltops shall be designed to minimize the visual impact of the development.


GMP-3.3 The Greater Monterey Peninsula Scenic Highway Corridor and Visual Sensitivity Map (Figure 14, next page) shall be used to designate visually "sensitive" and "highly sensitive" areas generally visible from designated Scenic Highways. The following policies shall apply to areas that have one of these designations:

- a. All areas designated as "sensitive" or "highly sensitive" shall be interpreted within the meaning of this policy and are to be protected.
- b. Landowners will be encouraged to dedicate scenic easements to an appropriate agency or non-profit organization over portions of their land shown as "sensitive" or "highly sensitive" on the Map.
- c. Areas shown as "highly sensitive" on the Map should be preserved as open space to the maximum extent possible through scenic easements or, if necessary, fee acquisition.
- d. New development should not be sited on those portions of property which have been mapped as "highly sensitive." Where exceptions are appropriate to maximize the goals, objectives and policies of this plan, development shall be sited in a manner which minimizes visible effects of proposed structures and roads to the greatest extent possible and shall utilize landscape screening and other techniques to achieve maximum protection of the visual resource.
- e. New development to be located in areas mapped as "sensitive" or "highly sensitive" and which will be visible from a designated scenic route shall maintain the visual character of the area. In order to adequately mitigate the visual impacts of development in such areas, the following shall be required:

Author: Tim Subject: Reclamation Date: 1/12/2008 4:43:33 PM -0700
 Author: Tim Subject: Note Date: 1/12/2008 4:46:37 PM -0700
 Riding, Recreational, and Hiking Trails should ...
 (e) is Carmel River Parkway Trail, which are encompassing State Park property at Carmel River State Beach and Carmel Hill (Hudson Canyon) with Piedra Blanca Regional Park and
 Jacks Peak County Park and the former Carmel Park.

GMP-3.9 Critical habitat areas should be preserved as open space. When an entire parcel cannot be developed because of this policy a low intensity, clustered development may be approved. However, the development should be located on those portions of the land least biologically significant so that the development will not upset the natural function of the surrounding ecosystem.

GMP-3.10 Work with appropriate state and federal agencies to ensure that oil transport activities near the Monterey County coast include adequate procedures to protect marine bird and mammal (particularly sea otter) populations and to clean up oil spills.

GMP-3.11  Riding and hiking trails should be acquired and developed with the intent of creating a coordinated, area-wide trails system. All motorized vehicles shall be prohibited from using these trails. In supporting a coordinated area-wide trails system, the highest priority should be given to establishing the following trails systems:

- a) a permanent riding and hiking trail from Roach Canyon to Jacks Peak Park;
- b) an easterly ridgeline trail from Jacks Peak Park to Laureles Grade;
- c) a major trail link which generally traverses in a southeasterly direction from Carmel Valley and forms a trail connection with the Los Padres National Forest trail system; and
- d) a connection trail from the Jacks Peak Park/Laureles Grade ridgeline trail to the entrance of Laguna Seca Recreation Area to be used as a point of departure to Toro Regional Park along Highway 68.

GMP-3.12 The County, through the Parks Department, shall address the following fundamental elements with regard to trail acquisition, development and use as expeditiously as possible:

- a) design standards,
- b) trail location,
- c) construction standards,
- d) liability questions,
- e) patrol and enforcement,
- f) restrictions or limitations on types of use appropriate to specific trails or trail segments,
- g) maintenance and operation plan, and
- h) burden of cost.

GMP-3.13 As development of bike paths and a coordinated, area-wide trails system are essential for circulation, safety and recreation in the Greater Monterey Peninsula Planning Area, dedication of trail easements may be required as a condition of development approval, notwithstanding Policy OS-1.10(b).



MONTEREY PENINSULA WATER MANAGEMENT DISTRICT

5 HARRIS COURT, BLDG. G
POST OFFICE BOX 85
MONTEREY, CA 93942-0085 • (831) 658-5600
FAX (831) 644-9560 • <http://www.mpwmd.dst.ca.us>

February 12, 2009

Carl Holm, Project Manager
Monterey County Resource Management Agency
Planning Department
168 West Alisal Street, Second Floor
Salinas, CA 93901

SUBJECT: Comments on 2007 Monterey County General Plan Draft EIR

Dear Mr. Holm:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the 2007 Monterey County General Plan Update project (State Clearinghouse Number 2007121001/County file # PLN070525). The Monterey Peninsula Water Management District's (MPWMD or District) comments are as follows.

Specific Comments

Page 4.3-11, fourth bullet: The text indicates that MPWMD is currently evaluating the feasibility of a desalination plant in Sand City, which would take 15 million gallons per day (mgd) of saline groundwater from the coastal beachfront and produce 7.5 mgd of potable water. This text should be updated to reflect the fact that MPWMD is no longer investigating the feasibility of a desalination plant in Sand City, but is investigating the feasibility of a desalination facility in the former Fort Ord area, north of Sand City. Specifically, the District is investigating the feasibility of a feedwater system extracting water from the shallow dunes sands on Fort Ord State Park. The expected yield of a desalination facility in this location, if feasible, will be determined as part of the current investigation. 1

Page 4.3-11, second paragraph: The tributaries to Tularcitos Creek should be "Chupines and Rana Creeks", not Choppiness and Rana Creeks. 2

Page 4.3-14, third bullet: The text should be revised as suggested above. Also, in the first paragraph, the last sentence should read "In 2006, Cal-Am obtained ...", not Calm obtained. 3

Page 4.3-31, Table 4.3-4: For the Fort Ord "Community Area", the Seaside Groundwater Basin Watermaster should be included under the "Management Authority" heading, "WPWMD" should be "MPWMD", and Cal-Am should be included under the "Water Supplier" heading. Also, the text in the third paragraph regarding the District's current desalination investigations should be revised as suggested above. 4

Carl Holm, Project Manager
 Monterey County Resource Management Agency - Planning Department
 February 12, 2009
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Page 4.3-36, first paragraph: The fourth sentence should read "Total usable storage in the Coastal Subarea of the Seaside Groundwater Basin is estimated to be approximately 7,500 acre-feet".

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Page 4.3-36, second paragraph: The first sentence should read "Because of a 1995 State Water Resources Control Board Order (Order No. WR 95-10) that ruled Cal-Am did not have a legal right to roughly 70% of the surface and groundwater it was presently diverting from the Carmel River and underlying Carmel Valley Alluvial Aquifer (refer to Carmel River Conflicts) ...". The fifth sentence should read "The judgment requires a 10% decrease in operating yield for the basin every three years beginning in Water Year 2009, unless replenishment supplies are secured or groundwater levels are sufficient to prevent seawater intrusion". The last sentence should read "The watermaster adopted the *Seaside Monitoring and Management Program* in 2006, as directed by the court."; the *Monitoring and Management Program* did not implement any decreases.

6

Page 4.3-38, fifth paragraph: The last sentence should read "The primary water supplier in the Carmel River Basin is Cal-Am, an investor-owned public utility that provides water to approximately 40,000 connections within the MPWMD".

7

Page 4.3-39, fourth paragraph: The second sentence should read "As a result, Cal-Am was charged by the State Water Resources Control Board with diverting water from the Carmel River and underlying aquifer unlawfully (Order 95-10, as amended by Orders 98-04 and 2002-0002)." The third sentence should be revised to reflect the fact that Order 2001-04 was rescinded in March 2002 by Order 2002-0002 and is not in effect.

8

Page 4.3-40, second paragraph: The second sentence should be revised to read "The State Water Resources Control Board granted ten temporary permits to MPWMD to allow diversions of water from the Carmel River between December and May for the years 1998 through 2007. In November 2007, the State Water Resources Control Board issued a permanent permit to MPWMD and Cal-Am to allow diversions of up to 2,426 acre-feet of water from the Carmel River between December and May". The last sentence should be revised to read "Under the proposed operational plan, the maximum extraction would be approximately 1,500 AFY, leaving a portion of the injected water in the Seaside Basin available for recovery during extended dry periods".

9

Page 4.3-46, fourth paragraph: The third sentence should be revised to read "The order further established an interim annual production goal of no more than 11,285 AFY from Carmel River sources and directed Cal-Am to secure permits for its unauthorized water use (10,730 AFY) ...". The order recognized that Cal-Am had valid rights for its authorized diversions from the Carmel River, i.e., 3,376 AFY.

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Page 4.3-47, third bullet: The requirement that Cal-Am cease withdrawals of water from San Clemente Reservoir and reduce diversions from production wells in the Upper Carmel Valley during low-flow periods of the year, except during an emergency was specified in Order 2002-0002, not Order 98-04. See following paragraph in text. 11

Page 4.3-47, third paragraph: The first sentence should be revised to read "In addition, because of growing concerns regarding the sustainable yield of the Seaside Groundwater Basin and the threat of seawater intrusion, Cal-Am filed a lawsuit to adjudicate the pumping and storage rights of the various groundwater pumpers in the Seaside Basin". Cal-Am's lawsuit was not filed in response to a SWRCB Order. In addition, it should be noted that 5,600 AFY is the amount of recent basin pumping, and is not 500 AFY less than the recent pumping maximum. 12

The second sentence should be revised to read "In a final ruling on March 27, 2006, the Court directed that current pumping in the basin, i.e., 5,600 AFY, be reduced by 10% every three years unless replenishment supplies are secured. Under the ruling, Cal-Am, which is the major pumper in the basin, is responsible for approximately 92% of the reduction in pumping".

Page 4.3-65, last paragraph: The first sentence should be revised to read "The MPWMD began the process of preparing a long-term *Seaside Basin Groundwater Management Plan* following AB 3030 guidelines in March 2004. This effort was superseded by the Seaside Basin adjudication proceedings and decision that was issued in March 2006". 13

Page 4.3-130, first paragraph: In addressing the environmental impact on water resources in the Monterey Peninsula area during the 2030 planning horizon, the document proposes a general mitigation measure:

WR-1: Support a Regional Solution for the Monterey Peninsula in addition to the Coastal Water Project,

and indicates that the draft 2007 General Plan will be revised to include a new policy: 14

PS-3.16 The County will participate in the Water for Monterey County Coalition , or similar regional group, for the purpose of identifying and supporting a variety of new water supply projects, water management programs, and multiple agency agreements that will provide additional domestic water supplies for the Monterey Peninsula and Seaside basin, while continuing to protect the Salinas and Pajaro River groundwater basins from saltwater intrusion. The County's general objective, while recognizing that timeframes will be dependent upon the dynamics of the regional group, will be to complete the cooperative planning of these water supply alternatives within five years of the adoption of the general plan and to implement the selected alternatives within five years after that time.

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Mitigation Measure WR-1 lacks specificity and is inadequate. To be considered adequate, a mitigation measure should be a specific, feasible action that will actually improve adverse environmental conditions and should be measurable to allow monitoring of its implementation. Mitigation measures consisting only of further studies, or consultation with regulatory agencies that are not tied to a specific action should be avoided. The proposed mitigation measure should specify who is responsible for its implementation, how the measure will be implemented and when it will be implemented.

14

Section 4.9.4.3 page 52, Regulatory Framework, Local Policies and Regulations: Please include a reference to MPWMD Rule 124 concerning Carmel River Management and Regulations. This rule requires that property owners obtain a valid River Work Permit issued by MPWMD for any work within the riparian corridor, which is defined as within 25 lineal feet of the 10-year flood waterline defined by the Nolte and Associates analysis for the 1984 Flood Insurance Study for Monterey County. The following link describes MPWMD's Rules and Regulations regarding River Work Permits: http://www.mpwmd.dst.ca.us/programs/river/CARMEL_RIVER_MGT_RULES.htm.

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Other Comments:

Control of Runoff from Developed Areas In the Water Resources section of the DEIR (Section 4.3), there is a description of the alteration of drainage patterns associated with the 2030 horizon and build out. MPWMD recommends that consideration be given to collection of runoff from developments that now discharge to open river channels. These discharges are, in effect, unnatural tributaries that cause localized destabilization of streambanks and permanent loss of riparian vegetation. Collection of this type of runoff would reduce the potential for streambank erosion and loss of riparian vegetation.

16

In addition, the Water Resources section talks about water quality being impacted by runoff associated with development. All development projects should consider using pervious pavement and other techniques to promote infiltration.

Care of Riparian Vegetation

In Carmel Valley, it is the responsibility of property owners to maintain in good condition the riparian areas of their property. With increased water use and development, irrigation and maintenance of the riparian corridor will need to continue, especially during times of drought, reduced streamflow, and lowered groundwater levels. The groundwater table in normal to dry years is annually drawn down below the root zone of riparian trees. Therefore, irrigation is necessary to maintain healthy riparian vegetation as long as this condition continues.

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If you have any questions regarding these comments, you may contact Andy Bell, MPWMD District Engineer, at 658-5620 or andy@mpwmd.dst.ca.us.

Carl Holm, Project Manager
Monterey County Resource Management Agency - Planning Department
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18

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Sincerely,


Darby Fuerst
General Manager

MST

MONTEREY-SALINAS TRANSIT

JOINT POWERS AGENCY MEMBERS:

*City of Carmel-by-the-Sea • City of Del Rey Oaks • City of Marina • City of Monterey • City of Pacific Grove
City of Salinas • City of Seaside • County of Monterey • City of Gonzales (ex. officio)*

October 24, 2008

Carl Holm
Assistant Director
County of Monterey
168 W. Alisal Street, 2nd Floor
Salinas CA 93901

Dear Mr. Holm:

Thank you for the opportunity to provide comments on the GPU draft EIR. Please amend the EIR document, Sections 4.6.2.3 and 4.6.2.8, to reflect the latest changes with MST services.

4.6.2.3 Tourism Traffic

Tourism is the county's second largest industry, and the continued expansion of the tourism industry in Monterey County will further exacerbate this source of impact. Present alternatives to the automobile are not attractive to casual weekend travelers or to long-distance tourists. Although visitors comprise a high percentage of commercial airline passengers arriving at Monterey Peninsula Airport (62 percent, according to a 1996 AMBAG study), the relatively low number of airline trips in and out of the Peninsula accounts for only a very small percentage of the annual tourist volume. Monterey-Salinas Transit's popular MST Trolley service is an example of a non-impact transportation mode specifically tailored to tourist demand. Line 22 is another bus route that is tailored to tourist demand as it serves the Big Sur coastline with a limited number of daily roundtrips year around. MST's Line 24 Carmel Valley Grapevine Express also is attractive with visitors and provides a safe alternative to driving between wine tasting venues while reducing congestion on Carmel Valley Road.

4.6.2.8 Public Transit Services

The Monterey-Salinas Transit (MST) system is an inter-city and intra-city bus service. MST serves a 280 square-mile area of Monterey County, Southern Santa Cruz County, and Santa Clara County. Intercity bus service is provided between Monterey-Salinas, Watsonville-Salinas, Watsonville-Marina, Monterey-San Jose, and Salinas-King City. Intra-city service is provided by in Carmel, Gonzales, Greenfield, King City, Marina, Monterey, Pacific Grove, Salinas, Seaside and Soledad. MST offers 37 routes

that serve an estimated 352,000 people residing within three-quarters of a mile from a fixed-route bus line. Three MST bus routes connect with Santa Cruz Metropolitan Transit District buses at the Watsonville Transit Center. One MST route offers daily express service to cities in southern Santa Clara County as well as downtown San Jose and provides convenient connections to Santa Clara Valley Transportation Authority (VTA) bus and light rail transit lines. This express route serves Diridon Station in San Jose with direct connections to AMTRAK, Altamont Commuter Express (ACE), as well as CALTRAIN commuter rail service. MST's rural service is provided to Carmel Valley and to Big Sur as well as to unincorporated areas of the county such as Castroville, Prunedale and Chualar. The MST Trolley offers locals and tourists service to popular tourist destinations within the City of Monterey.

Monterey County's paratransit program, MST RIDES, provides transportation for individuals with disabilities who are unable to use MST's regular fixed route transit services. The MST RIDES program also provides RIDES Special Transportation (RIDES ST) service for persons living outside of the ADA-required service corridor (up to three-quarters mile from any MST fixed route bus line). MST RIDES serves 14 municipalities in two counties and 10 additional communities in the unincorporated area of Monterey County. Service coverage spans the Monterey Peninsula, Salinas Valley and the Watsonville Transit Center in Santa Cruz County. As of October 2008, there are 3,171 people certified as ADA Paratransit eligible within the service area. About one half of that population resides in either Monterey or Salinas. The MST RIDES ST service area includes the unincorporated areas of Prunedale, Castroville, and Aromas for North Monterey County as well as the area along River Road from State Hwy 68 to, and including, Las Palmas Ranch II. The MST RIDES ST service area extends one mile on either side of Highway 101 from Salinas to Bradley including the unincorporated communities of San Lucas and San Ardo for South Monterey County. MST RIDES ST services are provided when MST RIDES and MST's regular bus services are in operation. Table 4.6-7 lists each of MST bus route. Exhibit 4.6.3 shows MST bus routes in Monterey County.

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If you have any questions regarding these changes, please do not hesitate to contact me.

Sincerely,



Michael Gallant
Planning Manager

Calderon, Vanessa A. x5186

From: Linda G. McIntyre [mcintyre@mosslandingharbor.dst.ca.us]
Sent: Wednesday, December 31, 2008 11:59 AM
To: ceqacomments
Subject: Water Transportation

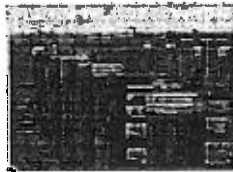
Hi Carl -- I'm not sure how critical it is to have accurate information on this one little tiny paragraph but will provide you with my info and you can decide:

Paragraph 4.6.2.11 Water Transportation. The info included in the second paragraph may apply to Monterey Harbor and may be accurate for them, but as for Moss Landing Harbor, a more accurate statement would be: "Most slip sizes are readily available with little or no waiting at Moss Landing Harbor".

Happy New Year and thanks, Carl

- Linda G.

Linda G. McIntyre, Esq.
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October 28, 2008

OCT 28 2008

RECEIVED

Carl Holm
Monterey County Planning Department
168 W. Alisal St., 2nd Floor
Salinas, CA 93901

Re: Comments Regarding the "2007 Monterey County General Plan Draft Environmental Impact Report" (Sch. No. 2007121001)

Dear Mr. Holm:

This letter provides comments on behalf of Salinas Union High School District ("District") on the 2007 Monterey County General Plan Draft Environmental Impact Report (Sch. No. 2007121001) dated September 2008 ("DEIR"), prepared by ICF Jones & Stokes.

The DEIR provides an analysis of the environmental impacts of the County of Monterey's ("County") proposed updates to its general plan ("General Plan"). While the DEIR does not analyze the environmental impacts of specific development projects, it does analyze the environmental impacts of the County's general planning document, which guides and governs all future development in the County. Furthermore, according to the DEIR, the County will experience significant population growth between now and 2030 (the General Plan's planning horizon), and continued growth until the County reaches "full buildout" in 2092. The DEIR projects the Monterey County population to grow from 432,600 in 2005 to 602,731 in 2030, and the unincorporated county population to grow from 110,083 in 2005 to 135,375 in 2030 (in spite of city annexations of county property). (DEIR pp. 3-8 – 3-10.) This anticipated population increase of nearly 200,000 residents by the year 2030 will have a major impact on District facilities, and the District hopes to work closely with the County and developers to ensure that this impact is properly mitigated.

The District notes that while the DEIR does not analyze the environmental impacts of specific development projects, the General Plan does address the proposed development of up to 1,147 residential units (along with commercial development and a community center) on approximately 671 acres in the Greater Salinas area, known as "Butterfly Village," which may require school sites and/or athletic fields. (General Plan GS-1.) Furthermore, the District understands that the City of Salinas ("City") is also planning large residential developments in the near future. Thus, the population growth

anticipated by the DEIR is well on its way, and will need to be appropriately analyzed to ensure that the District can serve the students generated by new development.

Senate Bill 50 and CEQA

The District is concerned about language in the DEIR that states that new development is fully mitigated by developer fees paid pursuant to Senate Bill ("S.B.") 50, so that all future development has a "less than significant" impact on District facilities apparently with no further analysis needed. In particular, the District notes the following language in the DEIR:

- In 1998, the California State Legislature enacted SB 50, which made significant amendments to existing State law governing school fees. SB 50 prohibited state or local agencies from imposing school impact mitigation fees, dedications, or other requirements in excess of those provided in the statute. Government Code Section 65995(e) provides that where payment has been made to a school district in accordance with the school fee program that is considered full mitigation of any school impacts. The legislation also prohibits local agencies from denying or conditioning any project (including a general plan) based on the inadequacy of school facilities. (DEIR p. 4.11-10.)
- Impact PSU-3: Development and land use activities contemplated in the 2007 General Plan may result in the need for new or expanded school facilities. (Less-Than-Significant-Impact) (DEIR p. 4.11-19.)
- As discussed above in the regulatory section, Government Code Section 65995(h) provides that payment of development impact fees in accordance with its provisions constitutes "full and complete mitigation of the impacts" of new development. (DEIR p. 4.11-20.)
- Paying school impact fees mitigates the impact of new development on schools under Government Code Section 65995(h). Therefore, the policies of the 2007 General Plan will ensure that this impact will be less-than-significant. (DEIR p. 4.11-20.)
- Development under the 2007 General Plan will result in a less-than-significant effect on schools. Paying school impact fees, as required by state law and proposed Public Services Element policy PS-7.8, mitigates the impact of new development on schools under Government Code Section 65995(h). (DEIR p. 4.11-21.)
- Development under the 2007 General Plan will result in a less-than-significant effect on schools. Paying school impact fees, as required by state law and proposed Public Services Element policy PS-7.8, mitigates the impact of new development on schools under Government Code Section 65995(h). (DEIR p. 4.11-22.)

The District objects to the concept that S.B. 50 removes the need for full analysis under the California Environmental Quality Act ("CEQA") of the impact of new development on school district facilities.

Environmental Impacts

S.B. 50 does not negate the County's responsibility under CEQA to analyze the environmental impacts of new development. Under CEQA, if a project "may" have a significant effect on the environment, a public agency must prepare an environmental impact report ("EIR"), giving a detailed analysis of all the effects on the environment by a proposed project. (Pub. Res. Code §§21061, 21080, & 21100.) One of the main purposes of the EIR is informational, to "provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment . . ." (Pub. Res. Code §21061.) This includes impacts on local agencies, including school districts. (See 14 C.C.R. §15382; 14 C.C.R. Appendices G & H.) S.B. 50 does not allow the County to bypass providing this information, regardless of whether the environmental impacts are later mitigated to a level of less-than-significant. However, even though the DEIR projects a population increase of nearly 200,000 by the year 2030, an increase that will clearly have an impact on the District, the DEIR does not analyze the impact of this population increase on the District, and arguably also concludes that no analysis will be necessary in the future.

Mitigation Measures

In addition to analyzing the project's environmental impacts, CEQA requires the EIR to analyze possible mitigation measures for all significant environmental impacts. (Pub. Res. Code §21100.) Furthermore, CEQA requires the adoption of mitigation measures necessary to reduce the impact to a level of less-than-significant, unless findings are made that "specific economic, legal, social, technological, or other considerations" makes a mitigation measure "infeasible." (14 C.C.R. §15091; see also Pub. Res. Code §§21002, 21002.1 & 21081; 14 C.C.R. §§ 15021 & 15096.) Again, the purpose of this analysis is in part informational, and the infeasibility of a particular mitigation measure does not negate CEQA's requirement that the EIR provide information about the measure and why it is infeasible. (See Pub. Res. Code §21061.)

S.B. 50 does not nullify the need for this mitigation measure analysis. In fact, since developer fees are one possible mitigation measure to address the impact of overcrowding in school districts caused by new development, the EIR should specifically analyze developer fees and determine the amount necessary to mitigate the impact of school overcrowding to a level of less-than-significant. To the extent that S.B. 50 potentially precludes collecting this amount of developer fees, higher fees would be a legally infeasible mitigation measure and the EIR should then state that it is infeasible to collect the developer fees needed to fully mitigate overcrowding, and acknowledge an unmitigated impact on school districts remains. The District notes that, as a practical matter, developer fees are generally insufficient to fully mitigate overcrowding in school district facilities.

Moreover, S.B. 50 only regulates mitigation of the impact of school overcrowding. There are many other impacts of new development that are not limited by S.B. 50, and that can and should be fully mitigated. Common examples include the need to widen roads or put in other traffic controls to accommodate the increased flow of traffic (both from students and generally), safety measures to address pedestrian travel to school, and the need to add sound-proofing to offset noise increases from nearby development and resulting traffic.

The DEIR simply states that developer fees will be collected pursuant to S.B. 50. It does not analyze the amount of fees necessary to mitigate school overcrowding. It does not determine whether fees collected pursuant to S.B. 50 are sufficient to mitigate this impact. It does not analyze additional mitigation measures to address impacts other than school facility overcrowding. Furthermore, the DEIR arguably concludes that there will be no need for such analysis in the future, when specific development projects are being analyzed. This analysis is insufficient under CEQA.

Statement of Overriding Considerations

Finally, if the County determines that significant impacts remain even after the imposition of all feasible mitigation measures, such as developer fees under S.B. 50, the County must adopt an applicable statement of overriding consideration. (Pub. Res. Code §§ 21002, 21002.1 & 21081; 14 C.C.R §§ 15021(a)(2), 15091(a) & 15096(g); see Sierra Club v. Gilroy City Council (1990) 222 Cal.App.3d 30.) Thus, the County would have to acknowledge and adopt public findings that, for example, the escalation of timing of the development in question outweighs the public's need for adequate school facilities.

The DEIR

The District requests that the County revise the DEIR so that it analyzes the various environmental impacts of new development on the District and determines their level of significance, analyzes potential mitigation measures, and either adopts mitigation measures sufficient to reduce the impacts to a level of less-than-significant or adopts a statement of overriding considerations. If the County is unable to provide detailed analyses of new development at the General Plan level, the DEIR should at least state that such analysis must be provided when environmental analyses are performed for specific projects. Furthermore, any discussion of S.B. 50 in the DEIR should clarify that the bill addresses only adequacy of facilities to accommodate new students, and not other impacts that may directly or indirectly impact schools and the populations they serve.

Alternate Measures to Mitigate Impact of New Development on the District

The District notes that S.B. 50 does not preclude the County from requiring mitigation from developers in addition to developer fees. In fact, the County can assist the District to address the impact of new development in several ways.

Land Dedication

One legally available mitigation measure would be for the County to consider adopting findings requiring any developer building residential units to dedicate land and/or funding pursuant to Government Code sections 65970 *et seq.* (all subsequent code sections refer to the Government Code unless otherwise specified), which permit the County to require a developer to dedicate land to a school district. Section 65974 specifically states that "for the purpose of establishing an interim method of providing classroom facilities where overcrowded conditions exist, . . . a city, county, or city and county may, by ordinance, require the dedication of land, or the payment of fees in lieu thereof, or a combination of both, for classroom and related facilities for elementary or high schools as a condition to the approval of a residential development."

A land dedication requirement would be good public planning benefiting all residents of the community, including future residents of new development. As development occurs, land suitable for new school sites grows scarcer. Under sections 65352 and 65352.2, the County has a duty to help plan for adequate services to their residents by ensuring that future sites are set aside for schools. Failure to do so leads to inadequate services, future controversies, and the potential need for a school district to exercise its rights under eminent domain to displace existing residents.

Land dedication under sections 65970, *et seq.*, remains a permissible mitigation measure under sections 65995, *et seq.*, which are cited by the DEIR. Section 65995, subdivision (a), specifically states that "[e]xcept for a fee, charge, dedication, or other requirement authorized under Section 17620 of the Education Code, or pursuant to Chapter 4.7 (commencing with Section 65970), a fee, charge, dedication or other requirement for the construction or reconstruction of school facilities may not be levied . . ." Section 65995 expressly excludes Chapter 4.7, inclusive of section 65974, from this limitation, thus permitting a county to address conditions of overcrowding in school facilities or inadequately sized school sites by requiring, for example, the dedication of land.

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Phasing

Another method by which the County can work cooperatively with the District within all legal constraints to ensure adequate school facilities with regard to new development is by requiring development to be phased and not permitted prior to availability of school facilities. Timing development so as to balance the availability of school facilities with new development can significantly aid the District in its attempt to provide for the additional students generated by new development. At the same time, it is not a denial of development.

Cooperative Use

The County and the District can also work together to ensure adequate school facilities to serve the residential units contemplated by new development by entering into a partnership to jointly use school and park land for recreation and educational purposes. It

is desirable for both public entities to have land set aside for both school and park use so that a single joint use facility of ten or more acres would be available to both the District and residents within new development.

Coordination with District to Mitigate Impact of New Development

The District also is concerned that the DEIR and the General Plan do not clarify the need for the County to coordinate planning of new development with the District. While the language regarding the need to reserve school sites "in consultation with the affected districts" in the General Plan policy PS-7.1 is helpful, sections 65352 and 65352.2 require local cities and counties to coordinate planning of school facilities with school districts. The Legislature also confirmed that the parties are meant to coordinate "[o]ptions for the siting of new schools and whether or not the local city or counties existing land use element appropriately reflects the demand for public school facilities, and ensures that new planned development reserves location for public schools in the most appropriate locations."

The Legislature recognized that new planned development should take into consideration and even "reserve" where schools would be located to serve the development because schools are as integral a part of planning for new development as is any other public service, such as fire, police, water and sewer. The intent behind sections 65350, et seq., supports the District's position that the County must analyze whether the current size of District schools is adequate to accommodate both its existing population and new development, particularly in light of cumulative impacts.

Specific Development Projects

The District requests that the County contact the District as early as possible in the planning process for specific new development projects. This will allow the District to take the projects into account in its facilities plans. It will also allow the District to give the County input regarding appropriate information to be included in project's environmental analyses, in order to fully analyze the project's impact on District facilities. Including such information in the project's environmental analysis will greatly facilitate the District's interaction with developers and will enable the District to better work with the County to ensure that the children residing in the area have appropriate educational facilities that may safely be accessed.

The District is prepared to provide the information necessary to assist the County in its preparation of specific environmental analyses for future development projects. For your information, we have attached the District's most recent "School Facilities Needs Analysis and Justification Report," the District's "School Facility Master Plan," and the District's demographic analysis and forecasts as examples of the type of documents that the District can provide to assist the County in its environmental analyses. District staff would be happy to provide the County with updated documents as necessary, and also provide any additional information needed for the County to fully and adequately analyze the impact of new development on the District.

We note that we are aware of other cities and counties that have sometimes taken the position that S.B. 50 precludes either or both analysis of school impacts in an environmental analysis and mitigation of those impacts. Our attorneys, the law firm of Lozano Smith, have had success in meeting with local agencies and their attorneys to address these issues. This has helped to educate public agencies on what they can still do to address and assist public schools, and has allowed for correction of misinformation regarding the effects of S.B. 50. Correcting such misinformation assists cities and counties in ensuring that they are still meeting their CEQA obligations. Materials prepared by our attorneys on this subject are attached.

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Thank you for this opportunity to provide comments regarding the DEIR. The District looks forward to working with the County to ensure that the District's needs are met and that development in the County will be served by adequate and appropriate educational facilities. Please feel free to contact me if you have any questions.

Sincerely,



Karen L. Luna
Manager of Planning and Facilities

TM/kll

Enclosures:

School Impact Fees – Options Under S.B. 50
Salinas Union High School District School Facility Master Plan w/ Demographic
Analysis and Forecasts for Salinas Union High School District
School Facilities Needs Analysis and Justification Report for the Salinas Union
High School District

cc: Thomas Manniello, Lozano Smith
Jim Earhart – Associate Supt. – CBO w/o enclosures

School Impact Fees – Options under S.B. 50

February 2008

The following summary outlines options concerning mitigating the impact of new development on school facilities in the era of Senate Bill 50 ("S.B. 50"), which became effective in 1998. The summary provided here is necessarily general, and does not constitute legal advice; legal counsel should be consulted regarding these options.

Developer Fees Under S.B. 50

Prior to S.B. 50, a series of appellate court decisions allowed cities and counties to use their legislative "police power" over land use to assist school districts by requiring developer fees, land dedications, or other measures to mitigate fully the impacts of development on school facilities, even if the mitigation measures exceeded the then-applicable statutory school impact fee. (Mira Development Corp. v. City of San Diego (1988) 205 Cal.App.3d 1201; William S. Hart Union High School v. Regional Planning Commission (1991) 226 Cal.App.3d 1612; Murrieta Valley Unified School District v. County of Riverside (1991) 228 Cal.App.3d 1212.) Central to this line of cases was the duty of cities and counties to assess and mitigate the environmental effects of development under the California Environmental Quality Act ("CEQA") (Pub. Res. Code §§ 21000, *et seq.*), including the impacts on schools.

S.B. 50 now provides for three levels of statutory fees. The first is the existing statutory fee, which we refer to as a "Level 1" fee. (Gov. Code § 65995.) That fee is adjusted for inflation every two years by the State Allocation Board ("SAB"). The most recent increase was a substantial one, with the SAB approving an increase from \$2.63 to \$2.97 per square foot of residential development for unified districts in January of 2008. For a school district to implement the increase, it must take its own separate action, based on a developer fee justification study establishing a "nexus" between the impact of new development and the fee. (Gov. Code § 66001. See also Warmington Old Town Assocs. v. Tustin Unified School District (2002) 101 Cal.App.4th 840.)

S.B. 50 also established a basis for additional fees if certain criteria are met. The second, or "Level 2" fee – referred to in the legislation as a "supplemental" fee – is the equivalent of the statutory fee plus an additional amount that, when taken together, are assumed under state standards to equal roughly 50% of a district's actual facilities needs. (Gov. Code § 65995.5.) The final "Level 3" fee, which is roughly 100% of a district's need as established under the state standards, can be imposed only if state funds are no longer available. (Gov. Code § 65995.7.) The Level 2 and Level 3 fees must be justified by a "school facilities needs analysis" ("SFNA") that, unlike a Level 1 justification study, must utilize specific state criteria.

As a tradeoff for the higher Level 2 and 3 fees, the Legislature in S.B. 50 also restricted the ability to impose still higher fees, under CEQA or otherwise. The law states that the payment of the development fees authorized by S.B. 50 constitutes "full and complete mitigation of the impacts of any legislative or adjudicative act" involving the planning, use, or development of real property "on the provision of adequate school facilities." (Gov. Code § 65995, subd. (h) (emphasis added).) The Code further provides that an agency is precluded from denying or refusing to approve a legislative or adjudicative act involving development "on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized [by S.B. 50]." (Gov. Code § 65995, subd. (i).)

This tradeoff has caused impacted school districts that do not qualify for Level 2 fees to seek additional avenues for addressing the impacts of new development on schools. Similarly, some districts find that even if they are eligible for Level 2 fees, the required state formula results in a fee lower than the district's actual need.

Additional Options Available to School Districts

In addition to adopting the maximum justifiable Level 1 fee, there remain a number of options to seek additional means of addressing a school district's needs.

1. S.B. 50 Level 2 Fees

The first option is to seek Level 2 fees under S.B. 50. Our firm has published a handbook that includes detailed information, procedures, time lines, checklists, and forms to assist school districts in enacting both Level 1 and Level 2 developer fees, which can be ordered at <http://www.lozanosmith.com/briefs/pdf/other/DFHOrderForm.pdf>.

The remaining options described below are applicable primarily to districts that determine that they are not eligible for Level 2 fees, or whose Level 2 fees will be insufficient to address the impact of development upon school facilities.

2. Hardship Funds

If the District is heavily impacted, experiences unusual circumstances beyond its control, or faces extreme financial hardship, it may qualify for state hardship funding. (Ed. Code § 17075.10.) If the District meets all of the state's qualifying criteria (which include making all reasonable efforts to impose the maximum developer fees), it may be able to obtain additional state funding for new construction or modernization. However, due to the nature of the state's complex formula for hardship funding, eligibility is not a given, even when a district appears clearly to have needs justifying the funding.

3. Rely on The Possibility of Denying Development

As noted above, S.B. 50 states that no development project may be denied on the basis of inadequate school facilities. (Gov. Code §§ 65995, subd. (i) & 65996, subd. (b).) However, cities and counties maintain a general police power to approve or disapprove whatever

development they feel is appropriate for their jurisdiction. While they may be limited in the ability to single out schools and inform a developer that his or her project is being denied on the basis of inadequate school availability or lack of adequate mitigation, cities and counties can still conclude that a project does not contribute overall to the well-being of the city, or that the developer had not shown sufficient commitment to the community, and on that basis consider denying the project.

Working with a cooperative city or county, a school district may thus be able to bring developers to the table to negotiate additional school mitigation, such as participation in a Mello-Roos Community Facilities-District. As expressed in Government Code section 65995, subdivision (g)(2), a developer may still "voluntarily elect[] to establish, or annex into, a community facilities district . . ." Another option of how to address school issues is in a development agreement between the city or county and the developer.

Some cities and counties may provide support to schools in a tacit fashion, while other cities and counties may be more overt about their continued desire to support schools. Several years ago, the City of Livermore responded to arguments by developers that S.B. 50 precluded the City from imposing any extra-statutory school mitigation obligations by threatening a complete moratorium on new development. Such a moratorium would simply be a blanket halt of new construction, rather than a denial of particular developments on the basis of inadequate school facilities. Confronted with this threat, the developers agreed to continue mitigating school impacts as they had before the passage of S.B. 50. Generally, a moratorium comes through a voter referendum, but under Government Code section 65858, a city or county can also adopt an interim ordinance to prohibit uses in conflict with a contemplated general plan, specific plan or Zoning proposal if the approval of a development would result in a threat to the public welfare. This allows a city or county to delay development approvals while it studies the school issues, for a period that can extend up to almost two years.

In the City of Pleasanton, developers, based in large part on the support of the City for schools, have agreed to continue the extra-statutory payments that they had been making prior to S.B. 50's passage (see discussion below of voluntary mitigation agreements). As a result, the District continues to receive fees in the \$8.00 range, despite otherwise being ineligible for Level 2 fees.

As another example, San Ramon Unified School District worked with both of its local cities to establish agreements with developers for multiple developer-built schools. While the District's Level 2 fee is in the range of \$4.00 per square foot, the District estimates that the agreements reached carry a value in the \$8.00 per square foot range.

4. Phasing of Development

It is an open question under S.B. 50 whether a city or county can phase development to limit the impact of new construction on schools. It is not atypical for a city or county to phase development so that the next phase can proceed only if there are adequate utilities and infrastructure available. This is an avenue worth exploring, as developers often depend on bringing a relatively large percentage of their units on line at one time, so that the start-up costs of a project can quickly be covered. Confronted with delays, a developer may be willing to

compromise so as to adequately resolve the school issue.

Many of the same considerations regarding limitations on denial of a project under S.B. 50 apply to phasing. The argument in favor of phasing, however, may be stronger, since the "denial" of projects based on inadequate school facilities is explicitly prohibited, while the legislation is silent regarding limitations on phasing. As a result, we contend that phasing is still allowed by S.B. 50.

5. Seek Revision of City/County Mitigation Program

One option is to revise the local government's mitigation program, whether through revisions to the General Plan or through changes to the school district's procedures under that plan. Some cities and counties have a system where the local government will only approve a certain amount of development within a specified time frame, largely in order to avoid uncontrolled growth. For example, a city may have a program in which development applications are approved based on a point system. For each commitment that the developer makes to the community -- such as building parks, paying for sewer extensions, or funding schools -- the developer's point total is increased. This is a way of rewarding the developers who make the greatest contribution to the community. Such a program might still be defensible on the basis that the developer's project is not being directly denied on the basis of inadequate school facilities.

6. Impose Conditions on Development Related to Issues Other Than School Overcrowding

While school districts have long focused on the need to mitigate the impact of new development because of resulting school overcrowding, there are also other impacts of new development that can and should be mitigated. S.B. 50 does not "limit or prohibit the ability of a local agency to mitigate the impact of land use approvals other than on the need for school facilities, as defined in this section." (Gov. Code § 65996, subd. (e); see also Gov. Code § 65998, subd. (b) (repeating similar language).) "School facilities," in turn, are defined as "any school-related consideration relating to a school district's ability to accommodate enrollment." (Gov. Code. § 65996, subdivision (c) (emphasis added).)

There are numerous costly impacts associated with growth that do not directly relate to the ability to accommodate new students. Common examples include the need to widen roads or put in other traffic controls to accommodate increased traffic (both from students and generally), safety measures to address pedestrian travel to school, and the need to add sound-proofing to offset noise increases from nearby development and resulting traffic. To the extent that a school district can demonstrate that it confronts these or similar impacts that are unrelated to enrollment, the district can continue to seek conditions on the approval of development under CEQA that will mitigate the impact of such expenses. These conditions can also be used as a device to open negotiations for an agreed upon mitigation arrangement. For example, school districts represented by our firm successfully sued the City of Merced to overturn an environmental impact report for procedural errors, as opposed to issues relating to school overcrowding, in a successful effort to bring the City and developers back to the table to discuss school issues.

7. Maintain that School Facilities Are Not Available

The Government Code includes a process whereby a school district can find that conditions of overcrowding exist in "one or more attendance areas" that will impair educational programs. (Gov. Code § 65971, subd. (a)(1).) Note that this provision does not require that the entire district be overcrowded. A school district's board can further find that no reasonable, sufficient methods of mitigation are available. (Gov. Code § 65971, subd. (a)(2).) At that point, the local city or county can determine that fees or other obligations in addition to the statutory fees are appropriate in certain limited circumstances. (Gov. Code §§ 65972 & 65974.) S.B. 50 explicitly affirms that this remains a valid method of mitigation. (Gov. Code § 65996, subd. (a) ("the following provisions shall be the exclusive methods of considering and mitigating impacts on school facilities . . . : (1) Section 17620 of the Education Code [developer fees]. (2) Chapter 4.7 (commencing with Section 65970) [of the Government Code]".) We note, however, that these provisions are intended to fund only "interim" facilities which would be removed after 5 years. (Gov. Code § 65974, subd. (a)(3), (a)(4).)

8. Decline to Approve "Will-Serve" or Similar Letters

Many cities and counties ask that school districts provide "will-serve" letters or similar assurances that their facilities are adequate to accommodate new growth. In some cases, districts have refused to issue such a letter, potentially stopping the development project even while not "denying" the project based on inadequate school facilities.

There are also other opportunities for a school district to spell out that it has inadequate facilities. For example, real estate agents proposing to sell property through a subdivision must obtain a statement from the local school district indicating the "location of each high school, junior high school, and elementary school serving the subdivision." (Bus. & Prof. Code § 11010, subd. (11).) A school district could argue that there is no school available to "serve" a particular subdivision. This could help bring developers' representatives to the bargaining table to address school availability.

9. Referendum Process

There has been a movement statewide, primarily used by environmentalists and anti-growth groups, to use the referendum process to overturn decisions by cities and counties to approve development. Under this process, if a sufficient number of persons sign a petition, a development approval can be put to a general election. School districts and their supporters have not often attempted to utilize this process, but this may be an option that is worthy of exploration in light of the limitations of S.B. 50. Thus, while a city or county may be limited in its ability to deny development on the basis of inadequate school facilities, voters may be able to accomplish the same result.

10. Challenge The Validity of S.B. 50

One more severe option is to make a direct legal challenge to S.B. 50. Some have suggested that to the extent it can be shown that S.B. 50 does not provide for adequate school facilities, any

provision capping fees violates the California Constitution and potentially other applicable law. One specific theory, which has been explored by the League of Cities, is whether S.B. 50, to the extent that it does not provide adequate mitigation, can legally be allowed to preempt local mitigation requirements, as it unconstitutionally infringes on a city's police powers. This approach yet may eventually succeed through litigation and the cooperation of a sympathetic city or county.

11. Seek Voluntary Mitigation Agreements/Gifts

Another option that remains open is to seek voluntary participation in a Mello-Roos or payment of additional fees under a negotiated agreement. S.B. 50 specifically leaves the option of Mello-Roos arrangements in place, so long as the developer is not being "required" to participate as a condition of project approval. (Gov. Code § 65995, subd. (f).)

S.B. 50 is silent as to whether a voluntary agreement not involving a Mello-Roos is appropriate. We maintain that such agreements can be undertaken, but there are risks involved whether the voluntary agreement involves a Mello-Roos or otherwise. In particular, there can be a potentially negative effect on the District's future qualification for state funds. We have developed various agreements that provide for a gift of funds that may help avoid the gift being tied into any future state facilities financing. At the same time, there may be tax advantages to the developer. Pleasanton Unified, Alameda Unified, Byron Union, and Huntington Beach Union High School Districts are among just a few of our clients currently utilizing this approach. We note that we continue to negotiate school impact agreements statewide despite the limitations of S.B. 50.

12. Land Dedication under the Subdivision Map Act

The Subdivision Map Act states that "a city or county may adopt an ordinance requiring any [developer who develops in a school district] to dedicate to the school district . . . such land as the local legislative body shall deem to be necessary for the purpose of constructing thereon such elementary schools as are necessary to assure the residents of the subdivision adequate public school service." (Gov. Code § 66478; emphasis added.) Thus, the Subdivision Map Act allows a city or county to require land dedication for an elementary school in order to help a school district address the educational needs of the children from a new development. Nothing in S.B. 50 expressly prohibits continued reliance on the Subdivision Map Act.

13. Additional CEQA Considerations

Despite the passage of S.B. 50, there has remained controversy regarding how an environmental impact report or other environmental analysis conducted under CEQA should treat school impacts. While S.B. 50 clarifies that a project may not be denied on the basis of inadequate school facilities, the legislation does not appear to relieve a city or county from analyzing schools and concluding that there are significant impacts. Furthermore, the environmental analysis may have to recognize that there are impacts that remain unmitigated based on the available data. While a city or county could then adopt a statement of overriding consideration, finding that the merits of the project outweigh the unmitigated impacts, this is tantamount to a

city or county having to declare that a housing development is more important to its constituents than adequate schools.

Developers and local governments may argue that they no longer need to address school impacts in any detail or at all in CEQA analysis. We maintain that S.B. 50 has not changed CEQA requirements in this fashion. When cities and counties have analyzed this issue in more detail, they have often agreed with our conclusion. For example, legal counsel for the City of Gilroy conceded that the city should "carefully review and consider all information provided... as to the adequacy of school fees," and should include such information in its environmental documents, despite the terms of S.B. 50 regarding adequate mitigation.

For assistance regarding developer fees and other forms of addressing impacts on schools from new development, please feel free to contact any of Lozano Smith's offices.

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Prepared by: Harold Freiman (San Ramon Office)

**SCHOOL FACILITY NEEDS ANALYSIS
AND JUSTIFICATION REPORT**

for the

SALINAS UNION HIGH SCHOOL DISTRICT

July 2008

Prepared by
School Facility Consultants

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Prepared for

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Executive Summary

Pursuant to Government Code Section 65995.5, the Salinas Union High School District is authorized to collect Level II fees in the amount of \$2.17 per square foot of residential development located in the District's 7-12 and 9-12 service areas. In addition, pursuant to Government Code Section 65995.7, when applicable, the District is authorized to collect Level III fees in the amount of \$4.34 per square foot of residential development located within the District's 7-12 and 9-12 service areas.

The District meets the eligibility requirements in Government Code Section 65995.5(b) regarding the collection of Level II and III fees. The dollar amounts of the fees are based on the following facts and projections:

1. The student generation rates of residential housing units projected to be built in the District, calculated in accordance with Government Code Section 65995.6(a), are 0.347 for single-family units and 0.074 for multi-family units in the District's 7-12 service area and 0.234 for single-family units and 0.055 for multi-family units in the District's 9-12 service area.
2. The number of new residential housing units projected to be built in the District over the next five years is 782 single-family and 505 multi-family units, based on information provided by the City of Salinas and the County of Monterey.
3. Multiplying the appropriate terms in (1) and (2) shows that future residential development is projected to add 309 students.
4. The District has zero excess pupil capacity at the 9-12 grade levels available for students generated by future residential development and 374 seats of excess pupil capacity at the 7-8 grade levels.
5. The total number of unhoused pupils generated by future development equals 211 pupils in grades 7-12.
6. The per-pupil allowable costs for the Level II fee equation equal \$15,721.00 and \$19,892.00 for middle and high school students, respectively. These figures are equal to the per-pupil construction grant amounts in the State School Facility Program plus allowable per-pupil site acquisition and development costs calculated pursuant to Government Code Section 65995.5(c) and 65995.6(h).
7. Total allowable costs for the Level II/III fee equation equals \$4,197,212.00 (the District's 9-12 facility cost) for both the District's 7-12 and 9-12 service areas, as the District currently has capacity available to meet the 7-8 new development facility needs quantified in this Report.
8. The total amount of residential square footage projected to be built in the District over the next five years is 1,933,575 square feet for single- and multi-family units, based on an average square footage of 1,945 square feet and 817 square feet for single-family and multi-family units projected to be built in the District, respectively.
9. The District currently has capacity available to meet the 7-8 new development facility needs quantified in this Report. The District does not have local funds available to meet the school facilities needs of 9-12 pupils necessitated by future residential development.

As shown in the body of this Report, the District meets the requirements of Government Code Section 66001 regarding the collection of developer fees (the "reasonable relationship" or "nexus" requirements).

End of Summary

Introduction

The purpose of this Report is to calculate the fee amount that the Salinas Union High School District is authorized to collect on residential development projects pursuant to Government Code Sections 65995.5 and 65995.7. *School Facility Consultants* has been retained by the District to conduct the analysis and prepare this Report.

State law gives school districts the authority to charge fees on new residential developments, if those developments generate additional students and cause a need for additional school facilities. All districts with a demonstrated need may collect fees pursuant to Government Code Section 65995 (Level I fees). Level I fees are currently capped at \$2.97 per square foot of new residential development for grades K-12; this cap is adjusted bi-annually by the State Allocation Board, with the next adjustment scheduled for January 2010. The District currently shares developer fee revenue with feeder districts in its 7-12 and 9-12 service areas. The District receives 46.15 percent of fee revenue in its 7-12 service area, and 30.77 percent of fee revenue in its 9-12 service area. As a result, the District would be entitled to a Level I fee of \$1.37 per square foot of residential development in its 7-12 service area and \$0.91 per square foot of residential development in its 9-12 service area. Government Code Sections 65995.5 and 65995.7 authorize districts to collect fees in excess of Level I fees, provided that the districts meet certain conditions (Level II and Level III fees). Government Code Section 66001 requires that a reasonable relationship exist between the amount and use of developer fees and the developments on which they are to be charged.

The Salinas Union High School District provides seventh through twelfth grade education for the territory of the District served by the Salinas City Elementary and Alisal Union Elementary School Districts (the District's 7-12 service area). The District provides ninth through twelfth grade education only for the territory of the District served by the Graves Elementary, Lagunita Elementary, Santa Rita Union Elementary, Spreckels Union Elementary and Washington Union Elementary School Districts (the District's 9-12 service area). As a result, this Report calculates separate single- and multi-family Level II and Level III fees for both the District's 7-12 and 9-12 service areas as described above.

This Report is divided into three sections. The first summarizes the specific requirements in State law regarding Level II and Level III fees and establishes the District's authority to collect them. The second calculates the dollar amounts of Level II and Level III fees that the District is authorized to collect. The third explains how the District satisfies the requirements of Government Code Section 66001 with respect to Level II and III fees, summarizes other potential funding sources for school facilities and presents recommendations regarding the collection of developer fees.

End of Section

I. Authority to Collect Level II and Level III Fees

State law establishes several requirements in order for school districts to collect Level II fees. Specifically, districts must: (1) apply to the State Allocation Board and be deemed eligible for State funding for new school construction, (2) adopt a school facility needs analysis and (3) satisfy at least two of the four criteria set forth in Government Code section 65995.5(b)(3)(A-D).

The requirements for collecting Level III fees are the same as Level II fees. Before districts can collect Level III fees, however, the State Allocation Board must certify that it has no funds available to apportion to districts for construction of new school facilities.

The District has satisfied the three criteria for Level II fees as described below. If the State Allocation Board certifies that it has no funds available for apportionment, then the District will have satisfied the criteria for Level III fees as well.

A. Eligibility for State Funding for New Construction

The District has been deemed eligible to receive State funding for construction of new school facilities as outlined in Government Code Section 65995.5(b)(1). The District's most recent eligibility approval was at the July 25, 2007, meeting of the State Allocation Board (see Appendix A).

B. Adoption of School Facility Needs Analysis

This Report meets the requirements of Government Code Section 65995.6 for a school facility needs analysis, that is, a study that shall "determine the need for new school facilities for unhoused pupils that are attributable to projected enrollment growth from the development of new residential units over the next five years." By adopting this study, the District will satisfy this requirement.

C. Criteria in Government Code Section 65995.5(b)(3)(A-D)

The District meets the criterion outlined in 65995.5(b)(3)(C)(ii), that is, the District has issued debt or incurred allocations for capital outlay in an amount equivalent to 30 percent of the District's local bonding capacity. The District has issued debt equal to 39.4 percent of the District's bonding capacity (Outstanding general obligation bond debt of \$74,253,610 divided by the District's 2007/08 Bonding Capacity of \$188,430,258 equals 39.4 percent).

The District also meets the criterion outlined in 65995.5(b)(3)(D), that is, that at least 20 percent of the teaching stations within the District are relocatable classrooms. According to the District's current Office of Public School Construction Form SAB 50-02, 36.5 percent (168 out of 460) of the total teaching stations in the District are in relocatable classrooms. The District has also added capacity through the construction of (1) La Paz Middle School (37 permanent teaching stations), (2) an addition at Alisal High School (14 permanent teaching stations), (3) an addition at North Salinas High School (14 permanent teaching stations), (4) an addition at Harden Middle School (9 permanent teaching stations) and (5) an addition at Alvarez (Everett) High School (22 permanent

teaching stations). Including these projects in the District's capacity indicates that 30.2 percent (168 out of 556) of the total teaching stations in the District are relocatable classrooms.

End of Section

II. Amount of Level II and Level III Fees

State law outlines the method by which Level II fees are calculated. The intent of the law is that the Level II fee represents half the cost, as defined in the State School Facility Program, of providing new school facilities. The methods defined in State law for calculating the Level II fee, however, underestimate the District's true cost of providing school facilities.

The Level II fee is calculated by (1) determining the allowable cost for new school facilities as outlined in the State School Facility Program, and (2) dividing that cost by the amount of new residential square footage projected to be built in the District over the next five years.

A. Allowable Cost for New School Facilities

State law prescribes the following process for calculating the allowable cost for new school facilities:

- (1) determine the number of unhoused students attributable to future residential development;
- (2) multiply the number of unhoused students by the per-pupil construction costs of new elementary, middle or high schools as outlined in Education Code section 17072.10;
- (3) determine the amount of site acquisition and development costs to be included as allowed by Government Code Section 65995.5(h); and
- (4) subtract the amount of local funds dedicated to school facilities necessitated by future residential development from the sum of (2) and (3).

(1) Number of Unhoused Students

The number of unhoused students generated by future development in the next five years equals the total number of students generated by future development minus the District's existing excess pupil capacity.

As required by Government Code Section 65995.6(a), the student generation rate used to calculate the Level II fee is based on the historical generation rates of residential units constructed during the previous five years.

This Report estimates the number of students that will be generated by a new single- and multi-family housing unit by (1) counting the number of students in the District who live in housing units that paid developer fees between March 2003 and February 2008, and (2) dividing that number by the total number of housing units that paid developer fees over the same time period (see Appendix D). This Report uses historical developer fee collection data from the Salinas Union High School District to derive the housing counts and a District-provided March 2008 student list to derive the student counts.

Addresses for units that paid developer fees from March 2008 to the present date are not used in the calculation because (1) student address files may not reflect residents' address changes for up to one year, (2) students who have moved from a nearby district may continue to attend their previous school until the end of the school year and (3) units listed may not have been completed and occupied by the time the student address list was compiled.

The student generation rates for the 7-8 grade group are based on developer fee records only for those housing units located in the District's 7-12 service area (Salinas City Elementary School District and Alisal Union Elementary School District), as homes outside this area do not generate 7-8 grade pupils that attend the Salinas Union High School District.

Table 1-1 summarizes the student generation rates for single-family and multi-family units.

**Table 1-1
Student Generation Rates**

Grade Group	Single-Family	Multi-Family
7-8	0.113	0.019
9-12	0.234	0.055

Based on information provided by the City of Salinas Development and Permit Services Department and Department of Development and Engineering Services, the Housing Authority of the County of Monterey and the Monterey County Environmental Resource Policy – Housing and Redevelopment Office and the Monterey County Planning & Building Inspection Department, this Report estimates the District's projected residential development to be 782 single-family and 505 multi-family units over the next five years. These totals do not include new units projected to be built in developments bound by alternative mitigation agreements with the District as these developments will not be subject to the developer fees quantified in this Report (i.e., the Sconberg Ranch development project).

Table 1-2 shows the total number of students projected to enter the District from housing units built over the next five years.

**Table 1-2
Students Generated by Future Development**

	7-8 Students	9-12 Students
Single-Family	$0.113 \times 782 = 88$	$0.234 \times 782 = 183$
Multi-Family	$0.019 \times 505 = 10$	$0.055 \times 505 = 28$
Total Students	98	211

In determining how many of the students in Table 1-2 are unhoused, the District must consider any existing excess capacity. State law requires districts to calculate their

total pupil capacity according to the method described in Section 17071.10 of the Education Code. As stated on the District's current Office of Public School Construction Form SAB 50-02, the District's pupil capacity as calculated pursuant to Education Code Section 17071.10 is 3,252 in grades 7-8 and 6,211 in grades 9-12. These capacities are inclusive of the Special Day Class capacity identified on the District's Office of Public School Construction Form SAB 50-02, and do not reflect a Substantial Enrollment Requirement adjustment, as the District is not required to reflect a SER adjustment pursuant to School Facility Program Regulation Section 1859.35.

In addition to the capacity reflected on the District's Office of Public School construction Form SAB 50-02, the District has also added capacity through the State School Facility Program funding and the construction of (1) La Paz Middle School (879 7-8 seats), (2) an addition at Alisal High School (345 9-12 seats), (3) an addition at North Salinas High School (339 9-12 seats), (4) an addition at Harden Middle School (254 7-8 seats) and (5) an addition at Alvarez (Everett) High School (538 9-12 seats).

As outlined in Table 1-3 the District's total existing capacity is 4,385 students in grades 7-8 and 7,433 students in grades 9-12.

At the 7-8 grade group, the District has 374 seats of existing excess capacity (7-8 capacity of 4,385 minus 2007/08 7-8 enrollment of 4,011 equals 374 available seats, see Table 1-3). As a result, none of the 98 7-8 students listed in Table 1-2 are defined as unhoused.

At the 9-12 grade group, the District's current enrollment as reported in its October 2007 CBEDS information is greater than the 9-12 pupil capacity listed above: 9,561 students are enrolled in grades 9-12. Therefore, all 9-12 students listed in Table 1-2 are defined as unhoused.

**Table 1-3
Existing Capacity**

Grade Group	Capacity	2007/08 Enrollment	Existing Capacity Available for Students from Future Development	Unhoused Students from Future Residential Development
7-8	4,385	4,011	374	0
9-12	7,433	9,561	0	211

(2) Allowable Grant Costs

Table 1-4 shows the total allowable grant costs for new facilities necessitated by pupils generated from future single- and multi-family residential development. The per-pupil grant costs are taken from Education Code section 17072.10 and include

adjustments as required by Labor Code Section 1771.7(e) and Education Code Section 17074.56(a) (see Appendix B for details regarding grant cost calculations).

Table 1-4
Allowable Grant Costs for Pupils Generated from
Future Residential Development

Grade Group	Per-pupil Grant Cost	Number of Unhoused Students	Total Grant Cost
7-8	\$9,597.00	0	\$0.00
9-12	\$12,169.50	211	\$2,567,764.50

The per-pupil grant does not include the cost of school development items that the local community may deem important to meeting the quality of facilities in the District (i.e., administration, project management, contingencies, etc.). Because the per-pupil grants do not address certain costs, the actual funding will likely not be adequate to fund school facilities to the quality and level required by the District. Therefore, the final calculation of Level II fees will likely understate the funding actually required by the District.

(3) Allowable Site Acquisition and Development Costs

Table 1-5 shows the per-pupil site acquisition and development costs for middle and high school students. The site sizes for new middle school and high school projects are consistent with the guidelines in the "School Site Analysis and Development Handbook" published by the California State Department of Education.

Site acquisition costs for the District's new middle school and new high school projects equal \$364,000 per acre, based on (1) a land purchase that the District completed in January 2007 for the price of \$350,000 per acre, (2) an increase of four percent pursuant to Section 1859.74 of Title 2 of the California Code of Regulations for appraisals, surveys, site testing, California Department of Education review/approval, preparation of the POESA and PEA. Estimated site development costs are consistent with the guidelines in Government Code Section 65995.5(h) (see Appendix C for details regarding site acquisition and development cost estimates).

Table 1-5
Calculation of Per-pupil Site Acquisition and Development Costs

Grade Group	Per-pupil Site Acquisition Costs*	Per-pupil Site Development Costs	Total Per-pupil Site Acquisition and Site Development Costs
7-8	\$7,972	\$4,276	\$12,248
9-12	\$9,457	\$5,988	\$15,445

*based on District new middle school capacity of 1,000 students and new high school capacity of 1,500 students.

Pursuant to Government Code Sections 65995.5(c) and 65995.5(h), the allowable cost for site acquisition and development is calculated by (1) multiplying the per-pupil cost by one-half and (2) multiplying that result by the number of unhoused elementary, middle and high school students. Table 1-6 shows the total allowable site acquisition and development costs for new facilities necessitated by pupils generated from future single- and multi-family residential development.

Table 1-6
Allowable Site Acquisition and Development Costs for Pupils Generated from Future Residential Development

Grade Group	One-half of per-pupil costs	Number of unhoused students	Allowable Cost
7-8	\$6,124.00	0	\$0.00
9-12	\$7,722.50	211	\$1,629,447.50

(4) Local Funds Dedicated to School Facilities Necessitated by Future Development

As outlined in Table 1-7, the District currently has 2,128 9-12 students that are unhoused.

Table 1-7
Existing Unhoused Pupils

Grade Group	Current Capacity	2007-08 Enrollment	Existing Unhoused Pupils
7-8	4,385	4,011	0
9-12	7,433	9,561	2,128
Total	11,818	13,572	2,128

Table 1-8 summarizes the cost of providing school facilities for existing unhoused students. Table 1-8 uses a per-pupil grant cost that is twice the allowable cost for the Level II fee (because the Level II fee is intended to only reflect one-half the cost of providing school facilities as defined in the State School Facility Program). Per-pupil site acquisition and development costs are the same as those used to calculate the allowable cost for Level II fees.

Table 1-8
Cost of Providing School Facilities for Existing Unhoused Pupils

Grade Group	Existing Unhoused Pupils	Per-pupil Construction Costs	Per-pupil Site Acquisition and Development Costs	Total Cost
7-8	0	\$19,194	\$12,248	\$0
9-12	2,128	\$24,339	\$15,445	\$84,660,352
Total	2,128			\$84,660,352

*See Table 1-3 and Table 1-7

The District has no funds dedicated to school facilities necessitated by future development. The District has funds available for new construction projects, through the passage of its middle school (Measure M) and high school (Measure F) Proposition 39 General Obligation Bonds passed on November 5, 2002, and March 5, 2002, respectively, as well as developer fees and special reserve funds. The District also anticipates approximately \$252,041 in commercial/industrial developer fee revenue over the next five years based on the total commercial/industrial square footage that paid developer fees between March 2007 and February 2008, projected forward five years. The District's middle school bond funds are restricted to middle school projects, as the high school bond funds are restricted to high school projects, so this Report considers the District's available funds in relation to the cost of housing its currently unhoused pupils by middle (7-8) and high (9-12) school grade groupings.

For the 7-8 grade levels, the District currently has sufficient available capacity to house 7-8 grade pupils from new residential development.

For the 9-12 grade levels, the District has approximately \$16.65 million in authorized bond funds from the passage of its high school General Obligation Bond available for future new construction projects. The District also has \$1,332,225 in Capital Projects Fund balances available for 7-12 new construction projects. In addition, based on the total commercial/industrial square footage that paid developer fees between March 2007 and February 2008, the District estimates that there will be approximately \$252,041 in commercial/industrial developer fee revenue over the next five years available for 7-12 new construction projects. Even if all of the above funds were available for the District's 9-12 projects, the District's total available funds for housing 9-12 pupils would be approximately \$18,234,266. Comparing the \$18,234,266 in available funds to the cost of providing school facilities for existing unhoused 9-12 students (\$84,660,352) demonstrates that all these available funds are required to provide facilities for existing unhoused 9-12 students, with a need remaining of \$66,426,086. This remaining need far outstrips the Level II fee, which will generate only \$4,195,858 based on the projections contained herein.

The District has no surplus property that could be used for a high school site or that is available for sale to finance school facilities.

(5) Total Allowable School Facility Cost for Level II Fees

Tables 1-9a and 1-9b show the total costs for housing 7-8 grade and 9-12 grade pupils attributable to future residential development.

(continued on next page)

Table 1-9a
Total Cost for Housing 7-8 Grade Pupils from
Future Residential Development

Category	Amount
Construction	\$0.00
Site Acquisition and Development	\$0.00
Less Local Funds Dedicated	N/A
Total	\$0.00

Table 1-9b
Total Cost for Housing 9-12 Grade Pupils from
Future Residential Development

Category	Amount
Construction	\$2,567,764.50
Site Acquisition and Development	\$1,629,447.50
Less Local Funds Dedicated	N/A
Total	\$4,197,212.00

As demonstrated in Section II.A.(4) above, the District currently has sufficient capacity to house 7-8 pupils from future residential development quantified in this Report. Therefore, the total allowable cost for purposes of calculating the District's Level II/III developer fees on future residential development does not include the cost of housing 7-8 pupils resulting from this development. Tables 1-10a and 1-10b demonstrate the total allowable cost for the Level II/III fee calculation for the District's 7-12 and 9-12 service areas.

Table 1-10a
Total Allowable Cost for Level II/III Fees for Pupils from
Future Residential Development in the 7-12 Service Area

Category	Amount
Allowable 7-8 Pupil Cost	\$0.00
Allowable 9-12 Pupil Cost	\$4,197,212.00
Districtwide Total	\$4,197,212.00

Table 1-10b
Total Allowable Cost for Level II/III Fees for Pupils from
Future Residential Development in the 9-12 Service Area

Category	Amount
Allowable 9-12 Pupil Cost	\$4,197,212.00
Districtwide Total	\$4,197,212.00

B. Amounts of Level II and Level III Fees

The Level II fee is calculated by dividing the total allowable cost by the amount of new residential square footage projected to be built in the District over the next five years. As stated in Section II.A.(1) above, over the next five years 782 single-family and 505 multi-family units are projected to be built in the District. These totals do not include units projected to be built in developments bound by alternative mitigation agreements with the District as these developments will not be subject to the developer fees quantified in this Report (i.e., the Sconberg Ranch development project). Based on information provided by the City of Salinas Development and Permit Services Department and Department of Development and Engineering Services, the Housing Authority of the County of Monterey and the Monterey County Environmental Resource Policy – Housing and Redevelopment Office and the Monterey County Planning & Building Inspection Department, this Report estimates that new housing units in the District will have an average square footage of 1,945 square feet and 817 square feet for single- and multi-family units, respectively. Multiplying average square footage by number of units (1,945 square feet times 782 single-family units, plus 817 square feet times 505 multi-family units) produces a total of 1,933,575 square feet of residential development projected to be built in the District over the next five years.

State law allows school districts to charge a fee higher than a Level II fee if: (1) the district meets the requirements for Level II fees and (2) the State Allocation Board notifies that it has no funds available to apportion to districts for construction of new school facilities. In the District's case, this higher fee, referred to as a Level III fee, is approximately twice the Level II fee.

Tables 1-11a and 1-11b show the calculations for Level II and Level III developer fees for the District's 7-12 and 9-12 service areas, based on the total projected square footage figures and the total allowable costs identified in Section II.A.5, above:

Table 1-11a
Level II and III Fees for Pupils from
Residential Development in the 7-12 Service Area

Total Allowable Cost	\$4,197,212.00
Total Projected Square Footage	1,933,575
Level II Fee	\$2.17
Level III Multiplier	2
Level III Fee	\$4.34

(continued on next page)

Table 1-11b
Level II and III Fees for Pupils from
Residential Development in the 9-12 Service Area

Total Allowable Cost	\$4,197,212.00
Total Projected Square Footage	1,933,575
Level II Fee	\$2.17
Level III Multiplier	2
Level III Fee	\$4.34

The calculation of Level II and Level III fees, in accordance with the formulas provided in the statutes, will likely be understated when measured against the actual calculation of costs due to the limited inclusion of cost categories to determine actual costs per student and the fluctuating student generation rates. The District needs to account for these issues when conducting a revenue/cost analysis utilizing the calculated Level II and Level III fees.

End of Section

III. Findings and Recommendations

This section (1) shows that the District meets the requirements of Government Code Section 66001 regarding the collection of developer fees, (2) summarizes other potential funding sources for the District's capital projects, and (3) presents recommendations regarding the collection of developer fees.

A. Findings

(1) Government Code Section 66001(a)(1)—Purpose of the Fee

The purpose of imposing and collecting Level II or Level III fees is to acquire funds to construct or reconstruct school facilities for students generated by future residential developments.

(2) Government Code Section 66001(a)(2)—Use of the Fee

The District use of the fee will involve constructing and/or reconstructing new high school campuses and/or additional permanent facilities on existing high school campuses. In addition, the District may build other school related facilities and purchase or lease relocatable classrooms to use for interim housing while permanent facilities are being constructed.

Revenue from Level II or Level III fees collected on future residential development may be used for, but not limited to, all of the following:

- (1) land (purchased or leased) for school facilities,
- (2) design of school facilities,
- (3) permit and plan checking fees,
- (4) construction or reconstruction of school facilities,
- (5) testing and inspection of school sites and school buildings, and
- (6) interim school facilities (purchased or leased) to house students generated by future development while permanent facilities are being constructed.

(3) Government Code Section 66001(a)(3)—Relationship Between Fee's Use and the Type of Project Upon Which the Fee is Imposed

All types of new residential development—including but not limited to single- and multi-family units in new subdivisions and in "in-fill" lots, single- and multi-family units in redevelopment projects, single- and multi-family units that replace demolished units (to the extent that the new units are larger than the demolished units), additions of residential space to existing single- and multi-family units, manufactured homes, mobile homes and condominiums—are projected to cause new families to move into the District and, consequently, generate additional students in the District. As shown earlier in this Report, sufficient school facilities do not exist for these students. All types of new residential development, therefore, create a need for additional school facilities. The fee's use (acquiring school facilities) is,

therefore, reasonably related to the type of projects (new residential developments) upon which it is imposed.

(4) Government Code Section 66001(a)(4)—Relationship Between the Need for the Public Facility and the Type of Project Upon Which the Fee is Imposed

The District is currently operating over capacity at the 9-12 grade levels, that is, the District has no available capacity to house additional 9-12 students. Because future residential development in the District will generate additional students, it creates a need for additional school facilities. A relationship exists, therefore, between the District's need to build additional school facilities to house additional students and the construction of future residential development projects.

(5) Government Code Section 66001(b)—Relationship Between the Fee and the Cost of the Public Facility Attributable to the Development on Which the Fee is Imposed

This study concludes that the methods prescribed by State law for estimating school facility construction costs, and for calculating Level II and Level III fees, supports the establishment of Level II and Level III fees, which when collected, will contribute to the District's cost of constructing and reconstructing school facilities to house students generated by future residential construction. The relationship between the cost of the facility and the amount of fees is set forth above, including in Tables 1-4 and 1-5 of Section II.A.(2) and Section II.A.(3), respectively.

(6) Other Funding Sources

The following is a review of potential other funding sources for constructing school facilities. Please note that pursuant to Section II.A.4, the District does not have any local funds available for the construction of school facilities for housing students from new development.

a) General Fund

The District's General Fund budget is committed to instructional and day to day operating expenses and not used for capital outlay uses, as funds are needed solely to meet the District's non-facility needs.

b) State Programs

The District is approved for eligibility for State funding for construction of new school facilities under the 1998 Leroy F. Greene School Facility Program. As outlined in Section II.A.(1), the District has applied for and received funding for La Paz Middle School, and addition projects at North Salinas High School, Alisal High School, Harden Middle School and Everett Alvarez High School. Even projects funded at 100 percent of the State allowance, however, experience a shortfall between State funding and the District's actual facility needs. State funds for deferred maintenance may not be used to pay for new facilities. State law prohibits use of lottery funds for facilities.

c) General Obligation Bonds

School districts can, with the approval of either two-thirds or 55 percent of its voters, issue general obligation bonds that are paid for out of property taxes. The District gained voter approval for a Proposition 39 General Obligation Bond in March 2002, and another General Obligation Bond in November 2002. As outlined in Section II.A.(4), these bonds are either inadequate or unavailable to cover costs for high school facilities necessitated by future residential development.

d) Alternative Mitigation Agreements

Some residential development may choose to negotiate an alternative mitigation agreement with the School District. Students generated from these developments and the revenues from these mitigation agreements are not considered in this report, as these homes are not subject to the Fee considered in this report and the funds collected from these homes are not available to reduce the impact of development that will be subject to the Fee.

e) Parcel Taxes

Approval by two-thirds of the voters is required to impose taxes that are not based on the assessed value of individual parcels. While these taxes have been occasionally used in school districts, the revenues are typically minor and are used to supplement operating budgets. The District does not currently collect parcel tax revenue.

f) Mello-Roos Community Facilities Districts

This alternative uses a tax on property owners within a defined area to pay long-term bonds issued for specific public improvements. Mello-Roos taxes require approval from two-thirds of the voters (or land owners if fewer than 12) in an election. The District currently does not have any Mello-Roos authorizations.

g) Surplus Property

The District has no surplus property that could be used as a high school site or that is available for sale to finance school facilities.

Based on the forgoing, there are no excess funds to aid new construction to accommodate students from new development.

B: Recommendations

Based on the findings outlined above, it is recommended that the Board of Trustees, as provided for in Government Code Section 65995.5, approve a resolution to levy Level II fees on future residential development in the amount of \$2.17 per square foot of residential development located within the District's 7-12 and 9-12 service areas.

In addition, it is recommended that the Board of Trustees, as provided for in Government Code Section 65995.7, approve a resolution to levy Level III fees on future residential development in the amount of \$4.34 per square foot of residential development located within the District's 7-12 and 9-12 service areas.

End of Report

Appendix A

**State Allocation Board
New Construction Eligibility Approval**

State Allocation Board Meeting, July 25, 2007

ATTACHMENT A

Agency	City	Fund	Current Baseline Eligibility	Adjustment Per This Item	Net Baseline Eligibility
Pomona Unified	Los Angeles	64907-04-00	-506	-661	-128
			363	0	451
			-363	0	-451
			0	0	0
Saddleback Valley Unified	Orange	73635-00-00	363	0	451
			-363	0	-451
			0	0	0
Salinas Union High	Monterey	66159-00-00	0	-49	2351
			0	-1231	-2291
			0	188	358
			0	-1092	418
San Bernardino City Unified	San Bernardino	67878-00-00	1436	154	2492
			-3252	-1313	-2377
			-1818	-1159	115
San Diego City Unified	San Diego	68338-01-00	-369	-1692	192
			748	17	75
			1413	421	885
			1792	-1254	1152
San Diegoito Union High	San Diego	68346-00-00	0	1036	277
			0	-180	-48
			0	876	229
San Lorenzo Valley Unified	Santa Cruz	69807-00-00	349	-28	313
			75	0	0
			424	-28	313

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02
03

Appendix B

Calculation of Allowable Per-Pupil Grant Costs

Appendix B
Calculation of Allowable Per-Pupil Grant Costs

The per-pupil grant costs, calculated per the provisions of Government Code Section 65995.5(c)(1), include the School Facility Program (SFP) grants outlined in Education Code Section 17072.10, fire alarm and sprinkler grants mandated by Education Code Section 17074.56 and outlined in Education Code Section 17074.50 and 17074.52, and Labor Compliance Program (LCP) per Labor Code Section 1771.7(a) and (b), as illustrated in the tables below:

Since the fire alarm and sprinkler grants mandated by SB 575 are per-pupil grant increases, it is simple to add them to the SFP base new construction grant amounts (see Table B-1). These figures will then be used to determine the LCP grant increases for each of the District's projects used as cost models below, and then the per-pupil grant increases for each grade grouping, to produce final per-pupil grant figures for use in calculating the District's Level II/III fees.

Table B-1
SFP Per-Pupil Grants Plus Fire Alarm/Sprinkler Funding

Grade Group	Per-Pupil Grant	Total
SFP Grant	\$9,348	\$11,893
SB 575 Fire Alarm Grant	\$14	\$24
SB 575 Sprinkler Grant	\$177	\$183
50% Double Grant	\$9,539	\$12,100
100% Double Grant	\$19,178	\$24,200

These new per-pupil base grants, added to the per-pupil site development figures calculated in Appendix C, multiplied by the pupil capacity of each project used as a cost model, equals the estimated total funding (excluding site acquisition) for each project, as illustrated in Table B-2:

Table B-2
Calculation of Total Funding for Each District Cost Model Project

Project	Per-Pupil Cost	Number of Pupils	Total Cost
New MS	\$23,354	1,000	\$23,354,000
New HS Project			
School	Per-Pupil Cost	Number of Pupils	Total Cost
New HS	\$30,188	1,500	\$45,282,000

Table B-3 calculates the per-pupil LCP grant addition by grade grouping, using the per-site totals from Table B-2 to determine the total LCP grant for each site.

**Table B-3
Total LCP Grant Additions by Grade Grouping**

Projects	Total Cost	Total LCP Grant
New MS	\$23,354,000	\$116,087
9-12 Projects	Total Cost	Total LCP Grant
New HS	\$45,282,000	\$208,184

*Calculated pursuant to SFP regulation section 1859.71.4

Table B-4 calculates the per-pupil LCP grant addition by grade grouping, using the total LCP grants from Table B-3, dividing that figure by the appropriate pupil capacity, and averaging these results by grade group as necessary.

**Table B-4
Calculation of Per-Pupil LCP Grant Additions by Grade Grouping**

School	Total LCP Grant	Total Pupil Capacity	LCP Grant per Pupil
New MS	\$116,087	1,000	\$116
		100% Grant	\$116.00
		50% Grant	\$58.00
School	Total LCP Grant	Total Pupil Capacity	LCP Grant per Pupil
New HS	\$208,184	1,500	\$139
		100% Grant	\$139.00
		50% Grant	\$69.50

Table B-5 adds the per-pupil LCP grant additions calculated in Table B-4 to the totals calculated in Table B-1 to determine the final per-pupil construction grants allowable for use in the Level II-III fee calculations.

**Table B-5
Calculation of Final Per-Pupil Grant Costs by Grade Grouping**

Grade Group	7-8	9-12
SFP Construction Grant	\$9,539.00	\$12,100.00
50% LCP Grant	\$58.00	\$69.50
50% Total Grant	\$9,597.00	\$12,169.50

Appendix C

Calculation of Allowable Per-Pupil Site Acquisition and Site Development Cost

Appendix C

Calculation of Allowable Per-Pupil Site Acquisition and Site Development Costs

Site Acquisition Costs for Middle and High School Projects

The site sizes for new middle school and high school projects are consistent with the guidelines in the "School Site Analysis and Development Handbook" published by the California State Department of Education (CDE).

Site acquisition costs for the District's new middle school and new high school projects equal \$364,000 per acre, based on (1) a land purchase that the District completed in January 2007 for the price of \$350,000 per acre, (2) an increase of four percent pursuant to Section 1859.74 of Title 2 of the California Code of Regulations for appraisals, surveys, site testing, CDE review/approval, preparation of the POESA and PEA. Estimated site development costs are consistent with the guidelines in Government Code Section 65995.5(h).

Table C-1

Site Acquisition Costs for Middle and High School Projects

Projects	Number of Acres Required	Site Acquisition Cost Per Acre	Total Site Acquisition Cost
Middle:			
New middle school	21.9	\$364,000	\$7,971,600
Middle School Subtotal			\$7,971,600
High:			
New high school	38.97	\$364,000	\$14,185,080
High School Subtotal			\$14,185,080
Total			\$22,156,680

Site Development Costs for Middle School Projects

Service site development, off-site development, and utility costs for District middle school projects are based on the service site development, off-site development, and utility costs associated with the La Paz Middle School project, which received an apportionment at the September 22, 1999, meeting of the State Allocation Board, inflated by the Class B Construction Cost Index increase from 1.34 in September 1999 to 1.98, for a total inflation rate of 47.76 percent, as approved at the July 23, 2008, meeting of the State Allocation Board. These costs are as follows:

(continued on the next page)

**Table C-2
Service Site Development, Off-Site Development and Utility Costs
for Middle School Projects**

Middle School Projects	Costs
La Paz Middle School:	
Service Site	\$985,668
Off-Site	\$142,750
Utilities	\$156,448
Subtotal	\$1,284,866
Class B Construction Cost Index Adjustment (47.76%)	\$613,652
Total	\$1,898,518
Cost per Acre	\$114,280
Total Cost for New 21.9-Acre Middle School Project	\$2,501,659
Per-Pupil Cost	\$2,502

*La Paz Middle School is on a 16.62-acre site.

**21.9 acres is consistent with the CDE "School Site Analysis and Development Handbook" for a middle school with capacity of 1,000 pupils.

***Equals total cost divided by New MS capacity of 1,000 pupils.

Estimated general site development costs for District middle school projects are based on the average allowable general site development costs, as defined in Section 1859.76 of Title 2 of the California Code of Regulations. These costs are as follows:

**Table C-3
General Site Development Costs for Middle School Projects**

Middle School Cost Model Projects	Acre	Per-Acre Cost	Pupils	Per-Pupil Cost	Totals
Per-Useable Acre General Site Cost	21.9	\$28,728	n/a	n/a	\$629,143
Per-Pupil General Site Cost	n/a	n/a	1,000	\$1,145*	\$1,145,000
Totals	21.9	n/a	1,000	n/a	\$1,774,143
Average Per-Pupil General Site Development Cost**					\$1,774

*Equals 6% of the 7-8 per-pupil base grant amount of \$19,078.

**Equals the totals of the General Site Costs, divided by the pupil capacity of the projects.

The total anticipated Site Development Costs for District middle school projects equals the per-pupil service site, off-site and utility development cost for the District's middle school projects, plus the average per-pupil general site development costs related to the District's middle school projects. The following table illustrates the total per-pupil site development costs for future District middle school projects.

**Table C-4
Total Site Development Costs for Middle School Projects**

Middle School Projects	Costs
Average Per-Pupil Service Site, Off-Site and Utility Costs	\$2,502
Average Per-Pupil General Site Development Costs	\$1,774
Total Per-Pupil Site Development Cost	\$4,276

Site Development Costs for High School Projects

Service site development, off-site development, and utility costs for District high school projects are based on a November 2002 District estimate of site development costs for a new 50 acre high school project, inflated by the increase to the Class B Construction Cost Index from 1.46 in November 2002 to 1.98, for a total inflation rate of 35.62 percent, as approved at the July 23, 2008, meeting of the State Allocation Board. These costs are as follows:

**Table C-5
Site Development Costs for High School Projects**

High School Projects	Costs
Architect High School Site Development Estimate:	
Service Site	\$4,400,000
Off-Site	\$1,500,000
Utilities	\$250,000
Subtotal	\$6,150,000
Class B Construction Cost Index Adjustment (35.62%)	\$2,190,630
Subtotal	\$8,340,630
Site Development Cost per Acre	\$166,315
Total Site Development Cost for New 38.97 Acre High School Project	\$6,500,708
Per-Pupil Site Development Cost	\$4,928

*Architect estimate is based on a 50-acre school site.

**38.97 acres is consistent with the CDE "School Site Analysis and Development Handbook" for a high school with capacity of 1,500 pupils.

***Equals total site development cost divided by New HS capacity of 1,500 pupils.

Estimated general site development costs for District high school projects are based on the average allowable general site development costs, as defined in Section 1859.76 of Title 2 of the California Code of Regulations. These costs are as follows:

**Table C-6
General Site Development Costs for High School Projects**

High School Cost Model Projects	Acres	Per Acre Cost	Pupils	Per-Pupil Cost	Cost
Per-Useable Acre General Site Cost	38.97	\$28,728	n/a	n/a	\$1,119,530
Per-Pupil General Site Cost	n/a	n/a	1,500	\$908*	\$1,362,000
Totals	38.97	n/a	1,500	n/a	\$2,481,530
Average Per-Pupil General Site Development Cost					\$1,654**

*Equals 3.75% of the 9-12 per-pupil base grant amount of \$24,200.

**Equals the totals of the General Site Costs, divided by the pupil capacity of the projects.

The total anticipated Site Development Costs for District high school projects equals the per-pupil service site, off-site and utility development cost for the District's high school projects, plus the average per-pupil general site development costs related to the District's high school projects. The following table illustrates the total per-pupil site development costs for future high school projects.

Table C-7
Total Site Development Costs for High School Projects

High School Projects	Costs
Average Per-Pupil Service Site, Off-Site and Utility Costs	\$4,334
Average Per-Pupil General Site Development Costs	\$1,654
Total Per-Pupil Site Development Cost	\$5,988

Appendix D
Student Generation Rate Study

Please note that for privacy purposes, the street number has been omitted from each record in this developer fee collection database.

**Salinas Union High School District
Calculation of 7-8 and 9-12 Student Generation Rates
for Single- and Multi-Family Housing Units**

Single-Family Units

7-8 Matches by Grade Level; 7-12 Service Area Only

		Total Housing Units	SGR
7th Grade Matches	43	785	0.055
8th Grade Matches	46	785	0.059
Totals	89	785	0.113

9-12 Matches by Grade Level; 7-12 and 9-12 Service Areas Combined

		Total Housing Units	SGR
9th Grade Matches	67	1044	0.064
10th Grade Matches	58	1044	0.054
11th Grade Matches	59	1044	0.057
12th Grade Matches	62	1044	0.059
Totals	244	1044	0.294

Multi-Family Units

7-8 Matches by Grade Level; 7-12 Service Area Only

		Total Housing Units	SGR
7th Grade Matches	1	311	0.003
8th Grade Matches	5	311	0.016
Totals	6	311	0.019

9-12 Matches by Grade Level; 7-12 and 9-12 Service Areas Combined

		Total Housing Units	SGR
9th Grade Matches	11	579	0.019
10th Grade Matches	7	579	0.012
11th Grade Matches	5	579	0.009
12th Grade Matches	9	579	0.016
Totals	32	579	0.055

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
12/17/2003		Bradbury	1	SFU	7-12						
12/17/2003		Bradbury	1	SFU	7-12						
12/17/2003		Bradbury	1	SFU	7-12					1	
12/17/2003		Bradbury	1	SFU	7-12						
12/17/2003		Bradbury	1	SFU	7-12		1				
12/17/2003		Bradbury	1	SFU	7-12						
12/17/2003		Bradbury	1	SFU	7-12						
12/17/2003		Bradbury	1	SFU	7-12						
12/17/2003		Bradbury	1	SFU	7-12						
12/17/2003		Bradbury	1	SFU	7-12						
12/19/2003		Kent Circle	1	SFU	7-12						
12/19/2003		Kent Circle	1	SFU	7-12						
12/19/2003		Kent Circle	1	SFU	7-12						1
12/19/2003		Kent Circle	1	SFU	7-12						
12/19/2003		Kent Circle	1	SFU	7-12			1			
12/19/2003		Kent Circle	1	SFU	7-12			1			
12/19/2003		Kent Circle	1	SFU	7-12						
12/23/2003		Hemingway Drive	1	SFU	7-12						
12/23/2003		Hemingway Drive	1	SFU	7-12						1
1/12/2004		Arcadia Ct	1	SFU	7-12						
1/12/2004		Arcadia Way	1	SFU	7-12						
1/12/2004		Arcadia Way	1	SFU	7-12						
1/12/2004		Arcadia Way	1	SFU	7-12						
1/12/2004		Arcadia Way	1	SFU	7-12						
1/12/2004		Arcadia Way	1	SFU	7-12				1		
1/12/2004		Arcadia Way	1	SFU	7-12						1
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12			1			
3/5/2004		Bradbury	1	SFU	7-12					1	
3/5/2004		Bradbury	1	SFU	7-12				1		
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/5/2004		Bradbury	1	SFU	7-12						
3/18/2004		Canario	1	SFU	7-12		1				
3/18/2004		Canario	1	SFU	7-12		1				1
3/18/2004		Canario	1	SFU	7-12				1		
3/18/2004		Canario	1	SFU	7-12						1
3/18/2004		Canario	1	SFU	7-12						
3/18/2004		Canario	1	SFU	7-12					1	
3/18/2004		Canario	1	SFU	7-12						
3/18/2004		Milano	1	SFU	7-12						
3/18/2004		Milano	1	SFU	7-12		1	1		1	
3/18/2004		Milano	1	SFU	7-12		1				
3/18/2004		Milano	1	SFU	7-12						
3/18/2004		Milano	1	SFU	7-12	1					
3/18/2004		Milano	1	SFU	7-12			1			
3/18/2004		Milano	1	SFU	7-12						
3/18/2004		Milano	1	SFU	7-12						1
3/18/2004		Milano	1	SFU	7-12						

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
6/30/2004		Bradbury	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12	1	1				
7/16/2004		Piazza Dr.	1	SFU	7-12				1		
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/16/2004		Piazza Dr.	1	SFU	7-12						
7/27/2004		New Hampshire Ct.	1	SFU	7-12						
7/27/2004		New Hampshire Ct.	1	SFU	7-12						
7/27/2004		New Hampshire Ct.	1	SFU	7-12	1					
7/27/2004		New Hampshire Ct.	1	SFU	7-12						
7/27/2004		New Hampshire Ct.	1	SFU	7-12						
7/27/2004		New Hampshire Ct.	1	SFU	7-12						
7/27/2004		New Hampshire Ct.	1	SFU	7-12						
7/27/2004		New Hampshire Ct.	1	SFU	7-12						
8/8/2004		Piazza Dr.	1	SFU	7-12						1
8/8/2004		Piazza Dr.	1	SFU	7-12						
8/8/2004		Piazza Dr.	1	SFU	7-12						
8/8/2004		Piazza Dr.	1	SFU	7-12						
8/8/2004		Piazza Dr.	1	SFU	7-12	1					
8/8/2004		Piazza Dr.	1	SFU	7-12	1					
8/8/2004		Piazza Dr.	1	SFU	7-12						
8/8/2004		Piazza Dr.	1	SFU	7-12			1		1	
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/18/2004		Piazza Dr.	1	SFU	7-12		1				
8/18/2004		Piazza Dr.	1	SFU	7-12	1					
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/18/2004		Piazza Dr.	1	SFU	7-12						
8/27/2004		Piazza Dr.	1	SFU	7-12	1			1		
8/27/2004		Piazza Dr.	1	SFU	7-12						
8/27/2004		Piazza Dr.	1	SFU	7-12	1		1			
8/27/2004		Piazza Dr.	1	SFU	7-12					1	
8/27/2004		Piazza Dr.	1	SFU	7-12				1		
8/27/2004		Piazza Dr.	1	SFU	7-12						
8/27/2004		Piazza Dr.	1	SFU	7-12						
8/27/2004		Piazza Dr.	1	SFU	7-12						
8/27/2004		Piazza Dr.	1	SFU	7-12						
9/8/2004		Piazza Dr.	1	SFU	7-12						1
9/8/2004		Piazza Dr.	1	SFU	7-12					1	
9/8/2004		Verona Ct.	1	SFU	7-12			1			
9/8/2004		Verona Ct.	1	SFU	7-12						
9/8/2004		Verona Ct.	1	SFU	7-12						
9/8/2004		Verona Ct.	1	SFU	7-12					1	
9/8/2004		Verona Ct.	1	SFU	7-12			1			
9/8/2004		Verona Ct.	1	SFU	7-12						
9/10/2004		Acosta St.	1	SFU	7-12			1		1	
9/15/2004		Verona Ct.	1	SFU	7-12						
9/15/2004		Verona Ct.	1	SFU	7-12						
9/15/2004		Verona Ct.	1	SFU	7-12	1	1				
9/15/2004		Verona Ct.	1	SFU	7-12						
9/15/2004		Verona Ct.	1	SFU	7-12					1	
9/15/2004		Verona Ct.	1	SFU	7-12						
9/15/2004		Verona Ct.	1	SFU	7-12						

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
9/15/2004		Verona Ct.	1	SFU	7-12						
9/18/2004		Falcon Ridge Rd.	1	SFU	7-12						
10/4/2004		Verona Ct.	1	SFU	7-12						
10/4/2004		Verona Ct.	1	SFU	7-12						1
10/4/2004		Verona Ct.	1	SFU	7-12						
10/4/2004		Verona Ct.	1	SFU	7-12						
10/4/2004		Verona Ct.	1	SFU	7-12						
10/4/2004		Verona Ct.	1	SFU	7-12						
10/4/2004		Verona Ct.	1	SFU	7-12			1			1
10/4/2004		Verona Ct.	1	SFU	7-12						
10/11/2004		Orchard Ave.	1	SFU	7-12						
10/14/2004		Verona Ct.	1	SFU	7-12		1				
10/14/2004		Verona Ct.	1	SFU	7-12			1			
10/14/2004		Verona Ct.	1	SFU	7-12				1		
10/14/2004		Verona Ct.	1	SFU	7-12						
10/14/2004		Verona Ct.	1	SFU	7-12						1
10/14/2004		Verona Ct.	1	SFU	7-12						1
10/14/2004		Verona Ct.	1	SFU	7-12						1
10/25/2004		Verona Ct.	1	SFU	7-12						
10/25/2004		Verona Ct.	1	SFU	7-12						1
10/25/2004		Verona Ct.	1	SFU	7-12						
10/25/2004		Verona Ct.	1	SFU	7-12						1
10/25/2004		Verona Ct.	1	SFU	7-12				1		
10/25/2004		Verona Ct.	1	SFU	7-12	1		1			
10/25/2004		Verona Ct.	1	SFU	7-12	1					
11/18/2004		Verona Ct.	1	SFU	7-12						
11/18/2004		Verona Ct.	1	SFU	7-12						
11/18/2004		Verona Ct.	1	SFU	7-12		1			1	
11/18/2004		Verona Ct.	1	SFU	7-12						
11/18/2004		Verona Ct.	1	SFU	7-12	1					
11/18/2004		Verona Ct.	1	SFU	7-12	1					
11/18/2004		Verona Ct.	1	SFU	7-12				1		
12/1/2004		Verona Ct.	1	SFU	7-12		1				
12/1/2004		Verona Ct.	1	SFU	7-12						
12/1/2004		Verona Ct.	1	SFU	7-12						
12/1/2004		Verona Ct.	1	SFU	7-12						
12/1/2004		Verona Ct.	1	SFU	7-12		1		1		
12/1/2004		Verona Ct.	1	SFU	7-12						
12/1/2004		Verona Ct.	1	SFU	7-12						
12/1/2004		Verona Ct.	1	SFU	7-12						
12/1/2004		Verona Ct.	1	SFU	7-12						
12/1/2004		Verona Ct.	1	SFU	7-12						
12/1/2004		Verona Ct.	1	SFU	7-12				1		
1/19/2005		Verona Ct.	1	SFU	7-12						
1/19/2005		Verona Ct.	1	SFU	7-12						
1/19/2005		Verona Ct.	1	SFU	7-12					1	1
1/19/2005		Verona Wy.	1	SFU	7-12						
1/19/2005		Verona Wy.	1	SFU	7-12						
1/19/2005		Verona Wy.	1	SFU	7-12						
2/22/2005		Piazza Dr.	1	SFU	7-12						
2/22/2005		Piazza Dr.	1	SFU	7-12						
2/22/2005		Piazza Dr.	1	SFU	7-12						
2/22/2005		Piazza Dr.	1	SFU	7-12		1		1		
2/22/2005		Verona Wy.	1	SFU	7-12						
2/25/2005		Piazza Dr.	1	SFU	7-12						
2/25/2005		Piazza Dr.	1	SFU	7-12		1				
2/25/2005		Piazza Dr.	1	SFU	7-12						
2/25/2005		Piazza Dr.	1	SFU	7-12			1			
2/25/2005		Piazza Dr.	1	SFU	7-12		1			1	1
2/26/2005		Piazza Dr.	1	SFU	7-12						
2/25/2005		Piazza Dr.	1	SFU	7-12						
2/25/2005		Piazza Dr.	1	SFU	7-12						
2/25/2005		Piazza Dr.	1	SFU	7-12						
2/25/2005		Piazza Dr.	1	SFU	7-12						
3/10/2005		Arezzo Cir.	1	SFU	7-12						
3/10/2005		Arezzo Cir.	1	SFU	7-12						

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
6/28/2005		Canelli	1	SFU	7-12						
6/28/2005		Canelli	1	SFU	7-12						
6/28/2005		Canelli	1	SFU	7-12		1			1	
6/28/2005		Canelli	1	SFU	7-12						
6/28/2005		Canelli	1	SFU	7-12			1		1	
6/28/2005		Canelli	1	SFU	7-12						1
6/28/2005		Canelli	1	SFU	7-12						
7/7/2005		Amarillo	1	SFU	7-12						
7/7/2005		Amarillo	1	SFU	7-12	1					
7/7/2005		Amarillo	1	SFU	7-12	1					
7/7/2005		Amarillo	1	SFU	7-12		1				
7/7/2005		Amarillo	1	SFU	7-12						
7/7/2005		Amarillo	1	SFU	7-12	1				1	
7/7/2005		Amarillo	1	SFU	7-12						
7/7/2005		Amarillo	1	SFU	7-12						
7/7/2005		Amarillo	1	SFU	7-12	1					
7/7/2005		Amarillo	1	SFU	7-12						
7/7/2005		Amarillo	1	SFU	7-12						
7/7/2005		Amarillo	1	SFU	7-12	1					
7/7/2005		Pacific	1	SFU	7-12	1				1	
7/7/2005		Pacific	1	SFU	7-12					1	
7/7/2005		Pacific	1	SFU	7-12						
7/8/2005		Canelli	1	SFU	7-12				1		1
7/8/2005		Canelli	1	SFU	7-12						
7/8/2005		Canelli	1	SFU	7-12						
7/8/2005		Canelli	1	SFU	7-12						
7/8/2005		Canelli	1	SFU	7-12						
7/8/2005		Canelli	1	SFU	7-12						
7/8/2005		Canelli	1	SFU	7-12						
7/8/2005		Canelli	1	SFU	7-12						
7/8/2005		Laurel	1	SFU	7-12			1			
7/8/2005		Spoletto	1	SFU	7-12						
7/8/2005		Spoletto	1	SFU	7-12	1					1
7/8/2005		Spoletto	1	SFU	7-12						
7/8/2005		Spoletto	1	SFU	7-12						
7/8/2005		Spoletto	1	SFU	7-12						
7/8/2005		Spoletto	1	SFU	7-12						1
7/8/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						1
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12			1			1
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12	1			1		
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
7/21/2005		Spoletto	1	SFU	7-12						
8/10/2005		Cassino	1	SFU	7-12						
8/10/2005		Cassino	1	SFU	7-12						
8/10/2005		Cassino	1	SFU	7-12						
8/10/2005		Cassino	1	SFU	7-12						
8/10/2005		Cassino	1	SFU	7-12						
8/10/2005		Cassino	1	SFU	7-12			1			
8/10/2005		Cassino	1	SFU	7-12						
8/10/2005		Cassino	1	SFU	7-12	1					
8/10/2005		Cassino	1	SFU	7-12						1
8/10/2005		Cassino	1	SFU	7-12						
8/10/2005		Cassino	1	SFU	7-12						
8/10/2005		Spoletto	1	SFU	7-12					1	
8/10/2005		Spoletto	1	SFU	7-12						

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
8/10/2005		Spoletto	1	SFU	7-12						
8/10/2005		Spoletto	1	SFU	7-12						
8/10/2005		Tuscany	1	SFU	7-12						
9/13/2005		Cassino	1	SFU	7-12						
9/13/2005		Cassino	1	SFU	7-12			1			1
9/13/2005		Spoletto	1	SFU	7-12						
9/13/2005		Spoletto	1	SFU	7-12						
9/13/2005		Spoletto	1	SFU	7-12			1			
9/13/2005		Spoletto	1	SFU	7-12						
9/13/2005		Spoletto	1	SFU	7-12				1	1	
9/13/2005		Spoletto	1	SFU	7-12						
9/13/2005		Spoletto	1	SFU	7-12						
9/13/2005		Spoletto	1	SFU	7-12				1		
9/13/2005		Spoletto	1	SFU	7-12	1					
9/13/2005		Spoletto	1	SFU	7-12		1				
9/13/2005		Spoletto	1	SFU	7-12			1			
9/13/2005		Spoletto	1	SFU	7-12						
9/13/2005		Spoletto	1	SFU	7-12						
9/21/2005		Cross	1	SFU	7-12		1				
10/10/2005		Cassino	1	SFU	7-12						
10/10/2005		Cassino	1	SFU	7-12						
10/10/2005		Cassino	1	SFU	7-12	1					
10/10/2005		Cassino	1	SFU	7-12						1
10/10/2005		Cassino	1	SFU	7-12			1			
10/10/2005		Cassino	1	SFU	7-12						
10/10/2005		Cassino	1	SFU	7-12						
10/10/2005		Cassino	1	SFU	7-12						
10/10/2005		Spoletto	1	SFU	7-12						
10/10/2005		Spoletto	1	SFU	7-12						
10/10/2005		Spoletto	1	SFU	7-12						1
10/10/2005		Spoletto	1	SFU	7-12						
10/10/2005		Spoletto	1	SFU	7-12						
10/10/2005		Spoletto	1	SFU	7-12						
10/25/2005		Greenwood	1	SFU	7-12						
1/6/2006		Sanborn	1	SFU	7-12			1			
3/7/2006		Fuji	1	SFU	7-12						
3/7/2006		Padova	1	SFU	7-12						
3/7/2006		Padova	1	SFU	7-12						
3/7/2006		Padova	1	SFU	7-12						
3/7/2006		Padova	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/5/2006		Palermo	1	SFU	7-12						
4/28/2006		Modena	1	SFU	7-12						
4/28/2006		Modena	1	SFU	7-12						

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
4/28/2003		Modena	1	SFU	7-12						
4/28/2003		Modena	1	SFU	7-12						
4/28/2003		Modena	1	SFU	7-12		1				
4/28/2003		Modena	1	SFU	7-12				1		
4/28/2003		Modena	1	SFU	7-12						1
4/28/2003		Modena	1	SFU	7-12			1			
4/28/2003		Modena	1	SFU	7-12					1	1
4/28/2003		Modena	1	SFU	7-12				1		
4/28/2003		Modena	1	SFU	7-12						1
5/22/2003		Bologna	1	SFU	7-12			1			
5/22/2003		Piazza	1	SFU	7-12	1					
5/22/2003		Piazza	1	SFU	7-12					1	
5/22/2003		Piazza	1	SFU	7-12						1
5/22/2003		Piazza	1	SFU	7-12					1	
5/22/2003		Piazza	1	SFU	7-12			1		1	
5/22/2003		Piazza	1	SFU	7-12						1
5/22/2003		Piazza	1	SFU	7-12	1					
5/22/2003		Piazza	1	SFU	7-12			1			
5/22/2003		Piazza	1	SFU	7-12		1				
5/22/2003		Piazza	1	SFU	7-12					1	
5/24/2003		Modena	1	SFU	7-12						
5/24/2003		Modena	1	SFU	7-12			1		1	
5/24/2003		Modena	1	SFU	7-12						1
5/24/2003		Modena	1	SFU	7-12						
5/24/2003		Modena	1	SFU	7-12	1		1			
5/24/2003		Modena	1	SFU	7-12		1			2	
5/24/2003		Modena	1	SFU	7-12			1			
5/24/2003		Modena	1	SFU	7-12						
5/24/2003		Modena	1	SFU	7-12						
5/24/2003		Modena	1	SFU	7-12						
5/24/2003		Modena	1	SFU	7-12						
5/24/2003		Modena	1	SFU	7-12						
5/24/2003		Modena	1	SFU	7-12						
5/24/2003		Modena	1	SFU	7-12						
5/24/2003		Modena	1	SFU	7-12						
6/28/2003		Bologna	1	SFU	7-12						
6/28/2003		Bologna	1	SFU	7-12	1	1				
6/28/2003		Bologna	1	SFU	7-12						
6/28/2003		Bologna	1	SFU	7-12						
6/28/2003		Capri	1	SFU	7-12						
6/28/2003		Capri	1	SFU	7-12						
6/28/2003		Capri	1	SFU	7-12						
6/28/2003		Capri	1	SFU	7-12						
6/28/2003		Capri	1	SFU	7-12	1				1	
6/28/2003		Capri	1	SFU	7-12			1			
6/28/2003		Capri	1	SFU	7-12						
6/28/2003		Capri	1	SFU	7-12	1	1		1		1
6/28/2003		Capri	1	SFU	7-12						
7/25/2003		Carbonero St.	1	SFU	7-12						
7/25/2003		Carbonero St.	1	SFU	7-12						
7/28/2003		Campania Way	1	SFU	7-12					1	
7/28/2003		Campania Way	1	SFU	7-12						
7/28/2003		Campania Way	1	SFU	7-12						
7/28/2003		Campania Way	1	SFU	7-12						
7/28/2003		Campania Way	1	SFU	7-12		1				
7/28/2003		Campania Way	1	SFU	7-12						
7/28/2003		Campania Way	1	SFU	7-12						

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
7/26/2006		Campania Way	1	SFU	7-12						
7/26/2006		Campania Way	1	SFU	7-12						
7/26/2006		Campania Way	1	SFU	7-12		1				
7/26/2006		Campania Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
7/26/2006		Trivoli Way	1	SFU	7-12						
8/22/2006		Madeira Ave. N	1	SFU	7-12	1	1	1	1		
8/23/2006		Fontes Lane	1	SFU	7-12						
8/24/2006		Carbonero St.	1	SFU	7-12						
8/24/2006		Carbonero St.	1	SFU	7-12						
8/24/2006		Carbonero St.	1	SFU	7-12						
8/24/2006		Carbonero St.	1	SFU	7-12						
8/25/2006		Tuscany	1	SFU	7-12						
9/20/2006		Bologna Ct.	1	SFU	7-12			1			
9/20/2006		Bologna Ct.	1	SFU	7-12				1		1
9/20/2006		Bologna Ct.	1	SFU	7-12						
9/20/2006		Bologna Ct.	1	SFU	7-12						
9/20/2006		Bologna Way	1	SFU	7-12						
9/20/2006		Bologna Way	1	SFU	7-12						
9/20/2006		Bologna Way	1	SFU	7-12			1		1	
9/20/2006		Bologna Way	1	SFU	7-12						1
9/29/2006		Oak St.	1	SFU	7-12						
10/16/2006		Abbott St.	1	SFU	7-12						
11/29/2006		Bologna Way	1	SFU	7-12			1			
11/29/2006		Bologna Way	1	SFU	7-12						
11/29/2006		Bologna Way	1	SFU	7-12						
11/29/2006		Bologna Way	1	SFU	7-12						
11/29/2006		Bologna Way	1	SFU	7-12						
11/29/2006		Bologna Way	1	SFU	7-12						
11/29/2006		Bologna Way	1	SFU	7-12						
11/29/2006		Bologna Way	1	SFU	7-12						
12/6/2006		Bologna Ct.	1	SFU	7-12						
12/6/2006		Bologna Ct.	1	SFU	7-12				1		
12/6/2006		Bologna Ct.	1	SFU	7-12						
12/6/2006		Bologna Ct.	1	SFU	7-12			1			
12/6/2006		Bologna Ct.	1	SFU	7-12				1		
12/6/2006		Bologna Ct.	1	SFU	7-12						
4/17/2007		Eagles Roost Rd.	1	SFU	7-12						
5/29/2007		Wren St. #A (2nd Dwelling)	1	SFU	7-12						
6/21/2007		Burke St. (2nd dwelling)	1	SFU	7-12						
7/26/2007		Saint George Dr.	1	SFU	7-12						
7/26/2007		Saint George Dr.	1	SFU	7-12						
7/26/2007		Saint George Dr.	1	SFU	7-12						
7/26/2007		Saint George Dr.	1	SFU	7-12						
8/8/2007		Addington Lane #A (Graves Dist.)	1	SFU	7-12	1	1				
8/23/2007		Bolero Ave. #A (2nd Dwelling)	1	SFU	7-12						
8/30/2007		Bologna Ct.	1	SFU	7-12						

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
9/5/2003		Klamath Dr.	1	SFU	9-12			1			
9/5/2003		Klamath Dr.	1	SFU	9-12						
9/5/2003		Klamath Dr.	1	SFU	9-12						
9/5/2003		Klamath Dr.	1	SFU	9-12						
9/5/2003		Klamath Dr.	1	SFU	9-12			1			
9/11/2003		Saddle Rd.	1	SFU	9-12						
9/18/2003		Coit Ln.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12						1
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12				1		1
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12					1	1
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12						
9/23/2003		Arcadia Ct.	1	SFU	9-12			1			1
9/25/2003		Arcadia Way	1	SFU	9-12					1	
9/25/2003		Arcadia Way	1	SFU	9-12						
9/25/2003		Arcadia Way	1	SFU	9-12						
9/25/2003		Arcadia Way	1	SFU	9-12				1		
9/25/2003		Arcadia Way	1	SFU	9-12						
9/25/2003		Arcadia Way	1	SFU	9-12				1		
9/25/2003		Arcadia Way	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/1/2003		Mirador Court	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12				1		
10/13/2003		Kent Street	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12						
10/13/2003		Kent Street	1	SFU	9-12						
10/24/2003		Arcadia Way	1	SFU	9-12					1	
10/24/2003		Arcadia Way	1	SFU	9-12			2		1	
10/24/2003		Arcadia Way	1	SFU	9-12				1		
10/24/2003		Arcadia Way	1	SFU	9-12						
10/24/2003		Arcadia Way	1	SFU	9-12						
10/28/2003		Casiano Dr.	1	SFU	9-12						
11/5/2003		EstrellaD'oro	1	SFU	9-12						
11/10/2003		LaurelesGrade	1	SFU	9-12						
11/24/2003		Pasadera Ct.	1	SFU	9-12						
12/2/2003		CuestaVerde Dr.	1	SFU	9-12						
12/8/2003		Lucie Lane	1	SFU	9-12						
1/7/2004		SanBenancio Canyon	1	SFU	9-12						
1/16/2004		Berry Rd.	1	SFU	9-12						
1/21/2004		ViaDelMiliagro	1	SFU	9-12						
1/26/2004		LaurelesGrade	1	SFU	9-12						
1/28/2004		Berry Rd.	1	SFU	9-12						
1/29/2004		SanJon Rd.	1	SFU	9-12						
2/3/2004		ConalDeTierra Rd.	1	SFU	9-12						
2/6/2004		Monterey Hwy	1	SFU	9-12						
3/9/2004		LaurelesGrade	1	SFU	9-12						
3/22/2004		CaminoEscondido	1	SFU	9-12						
4/12/2004		Reservation Rd.	1	SFU	9-12						
5/14/2004		SanBenancio Rd.	1	SFU	9-12						
5/18/2004		ValleSanJuan Dr	1	SFU	9-12						1
6/2/2004		Middlefield Rd.	1	SFU	9-12						
6/5/2004		Robley Rd.	1	SFU	9-12						

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
8/10/2004		Fiver Rd.	1	SFU	9-12			1			
8/24/2004		Spur Road	1	SFU	9-12						
8/28/2004		FolandCanyon Rd.	1	SFU	9-12						
7/8/2004		EstrellaD'oro	1	SFU	9-12						
8/16/2004		UpperFourty Dr.	1	SFU	9-12						
8/18/2004		ElCaminoDeChamisse	1	SFU	9-12						
8/19/2004		Tesoro Ct.	1	SFU	9-12						
9/21/2004		ValleSanJuan Dr	1	SFU	9-12						
10/22/2004		BoldRuler Ln.	1	SFU	9-12						
11/11/2004		CorralDeTierra	1	SFU	9-12						
11/15/2004		BoldRiverLand	1	SFU	9-12						
11/24/2004		LaTerraza Ct.	1	SFU	9-12						
1/5/2005		CastleRock Rd.	1	SFU	9-12						
2/7/2005		Tesoro Rd.	1	SFU	9-12						
2/22/2005		Belmont Circle	1	SFU	9-12						
3/22/2005		CorralDelCielo	1	SFU	9-12						
3/22/2005		CorteDiego	1	SFU	9-12						
3/29/2005		Estrella Ave.	1	SFU	9-12						
4/6/2005		Belmont Circle	1	SFU	9-12						
4/6/2005		Belmont Circle	1	SFU	9-12						
4/13/2005		Belavida Rd.	1	SFU	9-12						
4/15/2005		CorralDeTierra	1	SFU	9-12				1		
5/3/2005		SanBenancio Rd.	1	SFU	9-12			1			
5/10/2005		Belmont Circle	1	SFU	9-12					1	
5/20/2005		Riverview Ct.	1	SFU	9-12						
6/23/2005		Tesoro Rd.	1	SFU	9-12						
5/31/2005		Tesoro	1	SFU	9-12						
5/31/2005		Tesoro Ct.	1	SFU	9-12						
6/1/2005		Maravilla	1	SFU	9-12						
6/21/2005		Assisi	1	SFU	9-12						
6/21/2005		Assisi Way	1	SFU	9-12						
6/24/2005		Zdan	1	SFU	9-12						
7/1/2005		Belmont	1	SFU	9-12						
8/5/2005		ViaDelMilagro	1	SFU	9-12						
8/22/2005		ViaDelCastillo	1	SFU	9-12						
8/23/2005		FuertaDelCalon	1	SFU	9-12						
8/24/2005		Cassino	1	SFU	9-12						
8/24/2005		Cassino	1	SFU	9-12						
8/24/2005		Cassino	1	SFU	9-12						
8/24/2005		Cassino	1	SFU	9-12			2			
8/24/2005		Cassino	1	SFU	9-12			1			
8/24/2005		Cassino	1	SFU	9-12						
8/24/2005		Cassino	1	SFU	9-12				1		
8/24/2005		Cassino	1	SFU	9-12						
8/24/2005		Cassino	1	SFU	9-12						
8/24/2005		Cassino	1	SFU	9-12				1		
8/24/2005		Cassino	1	SFU	9-12						
8/24/2005		Spoletto	1	SFU	9-12					1	
8/24/2005		Spoletto	1	SFU	9-12						
8/24/2005		Spoletto	1	SFU	9-12						
8/30/2005		ViaDelMilagro	1	SFU	9-12						
9/18/2005		CaleraCanyon	1	SFU	9-12						
9/29/2005		SanBenancioCanyon	1	SFU	9-12						
9/30/2005		Riverview	1	SFU	9-12						
10/24/2005		Belmont	1	SFU	9-12						
10/28/2005		Mirador	1	SFU	9-12						
12/14/2005		Laureles	1	SFU	9-12						
1/18/2006		SanBenancioCanyon	1	SFU	9-12						
1/19/2006		Belmont	1	SFU	9-12						
2/28/2006		CorralDeTierra	1	SFU	9-12						
3/6/2006		Riverview	1	SFU	9-12						
3/8/2006		SanBenancioCanyon	1	SFU	9-12						
5/8/2006		ViaDelMilagro	1	SFU	9-12						
5/12/2006		Pasadera	1	SFU	9-12						
6/26/2006		Manzanita	1	SFU	9-12						
7/7/2006		Pasadera	1	SFU	9-12						

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
7/7/2006		Soto Pl	1	SFU	9-12			1		1	
7/10/2006		Jasmine Ct	1	SFU	9-12						
8/2/2006		Pasadera Ct	1	SFU	9-12						
8/10/2006		Pasadera Ct	1	SFU	9-12						
9/7/2006		Zabala Rd	1	SFU	9-12						
10/17/2006		Via Del Milagro	1	SFU	9-12						
10/20/2006		Hidden Valley Rd	1	SFU	9-12						
11/9/2006		Pine Canyon Rd	1	SFU	9-12						
12/4/2006		Pasadera Ct	1	SFU	9-12						
12/4/2006		Via Del Milagro	1	SFU	9-12						
12/8/2006		Crazy Horse Cyn	1	SFU	9-12						
1/2/2007		Pasadera Dr	1	SFU	9-12						
1/12/2007		San Benancio	1	SFU	9-12				1		
1/19/2007		Covey Lane	1	SFU	9-12						
1/23/2007		Riverview Ct	1	SFU	9-12						
2/20/2007		Pasadera Dr	1	SFU	9-12						
4/30/2007		Corral De Tierra Road C	1	SFU	9-12						
4/30/2007		Pine Canyon Rd	1	SFU	9-12						
5/8/2007		Via Del Milagro	1	SFU	9-12						
5/21/2007		San Benancio Rd	1	SFU	9-12						
6/1/2007		Bolsa Loop	1	SFU	9-12						
6/1/2007		Bolsa Loop	1	SFU	9-12						
6/1/2007		Bolsa Loop	1	SFU	9-12						
6/1/2007		Fremont Drive	1	SFU	9-12						
6/1/2007		Fremont Drive	1	SFU	9-12						
6/7/2007		Bolsa Loop	1	SFU	9-12						
6/7/2007		Bolsa Loop	1	SFU	9-12						
6/7/2007		Bolsa Loop	1	SFU	9-12						
6/7/2007		Bolsa Loop	1	SFU	9-12						
6/7/2007		Bolsa Loop	1	SFU	9-12						
6/7/2007		Bolsa Loop	1	SFU	9-12						
6/7/2007		Bolsa Loop	1	SFU	9-12						
6/7/2007		Bolsa Loop	1	SFU	9-12						
6/7/2007		Fremont Dr	1	SFU	9-12						
6/20/2007		Via Del Milagro	1	SFU	9-12						
6/27/2007		Belmont Circle	1	SFU	9-12						
6/28/2007		Bolsa Loop	1	SFU	9-12						
6/28/2007		Bolsa Loop	1	SFU	9-12						
6/28/2007		Bolsa Loop	1	SFU	9-12						
6/28/2007		Bolsa Loop	1	SFU	9-12						
6/28/2007		Bolsa Loop	1	SFU	9-12						
6/28/2007		Bolsa Loop	1	SFU	9-12						
6/28/2007		Bolsa Loop	1	SFU	9-12						
6/28/2007		Bolsa Loop	1	SFU	9-12						
6/28/2007		Bolsa Loop	1	SFU	9-12						
6/28/2007		Bolsa Loop	1	SFU	9-12						
7/3/2007		Nacional Ave	1	SFU	9-12						
7/3/2007		Nacional Ave	1	SFU	9-12						
7/3/2007		Nacional Ave	1	SFU	9-12						
7/3/2007		Second St	1	SFU	9-12						
7/3/2007		Second St	1	SFU	9-12						
7/3/2007		Second St	1	SFU	9-12						
7/3/2007		Second St	1	SFU	9-12						
7/3/2007		Second St	1	SFU	9-12						
7/3/2007		Second St	1	SFU	9-12						
7/3/2007		Second St	1	SFU	9-12						
7/3/2007		Second St	1	SFU	9-12						
7/3/2007		Second St	1	SFU	9-12						
7/3/2007		Second St	1	SFU	9-12						
7/3/2007		Second St	1	SFU	9-12						
7/12/2007		Oso De Court	1	SFU	9-12						
7/19/2007		Bolsa Loop	1	SFU	9-12						
7/19/2007		Bolsa Loop	1	SFU	9-12						
7/19/2007		Bolsa Loop	1	SFU	9-12						
7/20/2007		Jackson St	1	SFU	9-12			2			1
7/24/2007		Bolsa Loop	1	SFU	9-12						
7/24/2007		Bolsa Loop	1	SFU	9-12						

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12	
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/24/2007		Bolsa Loop	1	SFU	9-12							
7/30/2007		Via Del Milagro	1	SFU	9-12							
8/20/2007		Big Sky Lane	1	SFU	9-12							
8/20/2007		Big Sky Lane	1	SFU	9-12							
8/20/2007		Big Sky Lane	1	SFU	9-12							
8/22/2007		Bolsa Loop	1	SFU	9-12							
9/19/2007		Calera Canyon	1	SFU	9-12						1	
9/21/2007		Via Del Milagro	1	SFU	9-12							
9/24/2007		Big Sky Lane	1	SFU	9-12							
9/24/2007		Big Sky Lane	1	SFU	9-12							
9/24/2007		Rustic Lane	1	SFU	9-12							
9/26/2007		San Benancio Rd.	1	SFU	9-12							
11/15/2007		Pasadera Ct.	1	SFU	9-12							
11/18/2007		Perez St.	1	SFU	9-12							
11/27/2007		Pasadera Ct.	1	SFU	9-12							
12/13/2007		Pasadera Ct.	1	SFU	9-12							
12/21/2007		Ranchito Drive	1	SFU	9-12							
Sub-Total 9-12 Service Area:			258					13	10	8	9	
Combined Total 7-12 and 9-12 Service Areas:						1044	43	48	67	88	59	62

Multi-Family Housing Units and Student Matches

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12	
4/21/03		Fontas	7	MFU	7-12							
10/10/2003		Laurel Dr	4	MFU	7-12		1	2			1	
1/5/2004		Constitution	17	MFU	7-12							
1/20/2004		Estrella Ave	12	MFU	7-12							
10/1/2004		Central	3	MFU	7-12		1				1	
10/1/2004		Central	3	MFU	7-12		1	1				
12/14/2004		Canario St	4	MFU	7-12	1	2	2	3	1	2	
4/19/2007		Front St.	85	MFU	7-12							
4/19/2007		Front St.	85	MFU	7-12							
5/2/2007		Front St. (81 apartments & comm.)	81	MFU	7-12							
11/28/2007		Castro St. Bldg. A	4	MFU	7-12							
11/28/2007		Castro St. Bldg. B	5	MFU	7-12							
Sub-Total 7-12 Service Area:						311	1	5	5	3	1	4

Date	Street #	Street Name	Units	SFU/MFU	Service Area	7	8	9	10	11	12
4/16/03		Independence	13	MFU	9-12			1			
4/16/03		Independence	13	MFU	9-12				3		
4/16/03		Independence	13	MFU	9-12						1
4/16/03		Independence	13	MFU	9-12						
4/16/03		Independence	13	MFU	9-12						
4/16/03		Independence	15	MFU	9-12						
5/15/03		Independence	13	MFU	9-12					1	
5/15/03		Independence	13	MFU	9-12			1		1	1
5/15/03		Independence	13	MFU	9-12				1		
5/15/03		Independence	13	MFU	9-12					2	2
5/15/03		Independence	13	MFU	9-12						
5/15/03		Independence	13	MFU	9-12						
5/15/03		Independence	13	MFU	9-12						
5/15/03		Independence	13	MFU	9-12			1			1
5/15/03		Independence	13	MFU	9-12			2			
5/15/03		Independence	13	MFU	9-12						
5/15/03		Independence	10	MFU	9-12						
10/28/2007		Rogge Village Loop Lot D (APARTMENTS) (multiple permits)	48	MFU	9-12						
Sub-Total 9-12 Service Area:						268		6	4	4	5

Combined Total 7-12 and 9-12 Service Areas:						579	1	5	11	7	5	9
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**SALINAS UNION
HIGH SCHOOL DISTRICT**

**SCHOOL FACILITY
MASTER PLAN**

March 2008

School Facility Consultants

**SALINAS UNION HIGH SCHOOL DISTRICT
SCHOOL FACILITY MASTER PLAN**

March 2008

Prepared for

SALINAS UNION HIGH SCHOOL DISTRICT

Prepared by

SCHOOL FACILITY CONSULTANTS

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APPENDIX

Appendix: Demographic Analysis and Forecast for Salinas High School District.

Executive Summary

The Salinas Union High School District School Facility Master Plan assesses the future facility needs of the District and provides options to meet the twenty-two year facility need. The Plan considers regional demographic data and development activities that may impact the student population. The Plan also identifies the existing facilities and examines various methods to house students. The District's twenty-two year facility needs are identified by examining enrollment projections in concert with the existing facilities. The Plan presents a Facility Plan, which meets the District's twenty-two year facility needs and identifies decision points for the District. The Plan also presents additional facility options that allow the District to remove/eliminate additional portable classrooms, relieving overcrowding at existing school sites. The Plan presents funding sources that may be used to accomplish the Facility Plan.

The Plan projects that the District's enrollment will grow up to 29 percent over the twenty-two year planning period (from 13,558 to 17,496). This level of growth shows that the District will not have sufficient permanent facilities to house the anticipated enrollment over the twenty-two year planning period. The District's use of portable classrooms, while housing student population growth, has had some negative impacts such as reducing the play field areas, locker rooms, gymnasiums, kitchens and administrative/counseling areas at the school sites. All schools are on sites that are smaller than those recommended by the California Department of Education (CDE) and therefore have student densities above the CDE recommendations.

The planning effort identified a series of goals of highest interest to the District and used these to develop and evaluate potential solutions for facility issues. The goals, as identified by district administrators, are:

- Eliminate portable classrooms that have become too old to maintain and reduce student densities on school sites which exceed the CDE recommendations,
- Free up classroom space that can be used for special programs,
- Take maximum advantage of State school facility funds.

At the request of the District, the Plan presents a Facility Plan for meeting the District needs over a twenty-two year period.

The consultant recommends the following Facility Plan:

- Construction of one new middle school with a capacity of 1,000 students;
- Construction of two new high schools (High School #1 with a capacity of 1,500 students and High School #2 with a capacity of 2,000 students).

Implementation of the Facility Plan will allow the District to remove some existing portable classrooms at all middle and high school campuses. However, certain sites will still have portable classrooms that have become too old to maintain and site densities well above those recommended by the CDE. As a result, the Plan provides the District with two additional facility options that would allow the District to eliminate additional portable classrooms that are too old to maintain and further reduce their site densities.

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These facility options are as follows:

- **Option #1**
A second new middle school with a capacity of 1,000 students.
A third new high school with a capacity of 2,000 students.
- **Option #2**
Option #1 plus a fourth new high school with a capacity of 2,000 students.

The Plan includes an Implementation Plan that outlines a suggested schedule of activities to be conducted to implement the Facility Plan.

Introduction

A. Purpose

The purpose of this School Facility Master Plan (Plan) is to identify the facility needs of the Salinas High Union School District (District) over a twenty-two year planning period and examine strategies to meet those needs.

The Plan is designed to provide a “road map” to help the District meet its facility needs over the next twenty-two years. The Plan addresses the estimated number of classroom facilities that are needed, when they are needed, how much they will cost, and potential sources of funding to pay for needed facilities.

Factors that affect facility needs such as residential development rates and enrollment growth will change as economic and other conditions change in the District. As a result, the facility needs identified in this Plan should be reexamined and modified when appropriate.

B. Content/Organization

The Plan is organized according to the following four questions:

- (1) Part One, What do we have?
- (2) Part Two, What do we need?
- (3) Part Three, What can we do to meet the need? and
- (4) Part Four, How can we pay for it?

Part One analyzes the District’s current facilities, including schools’ pupil capacity, site size and use of portable classrooms. Part Two compares the District’s projected enrollment growth with its current pupil capacities to quantify the additional pupil capacity required by the District. Part Three outlines alternative facility plans to meet the needs identified in Part Two. Part Four estimates the costs of the alternatives and identifies the District’s potential sources of funding.

C. Acknowledgments

The following individuals and agencies assisted the consultants in preparing the School Facility Master Plan.

James Earhart, Associate Superintendent, CBO, Salinas Union High School District (SUHSD)
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 Jeanne Gobalet, Lapkoff & Gobalet Demographic Research, Inc.
 City of Salinas Community Planning and Development Department
 City of Salinas Redevelopment Department
 Housing Authority of the County of Monterey
 Monterey County Planning Department

Part One – What do we have?

Summary of Key Points:

- The District's operates four middle schools, four high schools and one continuation high school.
- The District has a 7-8 permanent pupil capacity of 3,979 seats. Permanent classroom capacity utilization for 2007 is 100% percent (7-8 enrollment of 3,997). The District also has a 7-8 portable classroom capacity of 1,193 seats. Capacity utilization, including portable classrooms, is 77%.
- The District has a 9-12 permanent pupil capacity of 6,377 seats. Permanent classroom capacity utilization for 2007 is 150% percent (9-12 enrollment of 9,561). The District also has a 9-12 portable classroom capacity of 3,213 seats. Capacity utilization, including portable classrooms, is 100%.
- All middle school sites are operating at site densities above the CDE recommendations. These sites will benefit from the removal of portables. However, even if all portables are removed from these sites, they will still operate at student densities above the CDE recommendations.
- If portable classrooms are removed at Alvarez High, the site would operate at a student density below the CDE recommendation. Site densities at all other high school sites will also benefit from the removal of portable classrooms. However, even if all portable classrooms are removed from these sites, they will still operate at student densities above the CDE recommendations.
- Several school sites have portable classrooms that are 20 years of age or older and are overly expensive to maintain. These sites will benefit from the removal of these portables and should be a priority of the District. The removal of these portable classrooms will also benefit the District by reducing site densities at existing campuses.

Part One is divided into two sections. The first section analyzes the District's school sites' pupil capacity and current capacity utilization. The second section analyzes the use of portable classrooms and student densities on each school site.

A. Pupil Capacity/Facility Utilization

The capacity of a school site is determined by (1) counting the number of classrooms on the site, (2) multiplying each by the appropriate loading standard (the maximum number of students placed in a room), and (3) making adjustments to account for policies that affect capacity.

Tables 1 and 2 shows the pupil capacities and current utilization of each school site, both including and excluding existing portable classrooms. The classroom inventories, loading standards, and District policies that affect capacity are documented in the following subsections.

Because the site capacities in this Plan are being used for comparative planning purposes, they include adjustments for factors that affect a site's actual capacity (e.g., room usage policies, etc). Therefore, the school site capacities listed in the following tables might conflict with current daily usage and previously recorded capacity figures.

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**Table 1
2007 Pupil Capacity/Utilization of Middle Schools**

Site	Grades	Pupil Capacity		2007/08 CBES Enrollment	Current Capacity/Utilization	
		W/Ports	W/O Ports*		W/Ports	W/O Ports*
El Sausal MS	7-8	1,269	999	893	70%	89%
Harden MS	7-8	1,371	950	1,166	83%	123%
La Paz MS	7-8	1,242	999	979	79%	98%
Washington MS	7-8	1,290	1,031	959	74%	93%
Total		5,172	3,979	3,997		100%

**Table 2
2007 Pupil Capacity/Utilization of High Schools**

Site	Grades	Pupil Capacity		2007/08 CBES Enrollment	Current Capacity/Utilization	
		W/Ports	W/O Ports		W/Ports	W/O Ports
Alisal HS	9-12	2,322	1,593	2,464	106%	155%
Alvarez HS	9-12	2,403	1,296	2,241	93%	173%
North Salinas HS	9-12	2,084	1,652	1,997	96%	121%
Salinas HS	9-12	2,484	1,620	2,549	103%	157%
Mount Toro HS	9-12	297	216	310	104%	144%
Total		9,590	6,377	9,561	100%	150%

1. Classroom Inventories

Tables 3 and 4 list the classroom inventories of each site. The inventories are based on current site utilization diagrams provided by the District and site administrators and conversations with District administrators regarding the use of classrooms for the 2007 school year.

**Table 3
Classroom Inventory, Middle School Sites**

Site	Standard Classroom	Port- Out	Special Day	Non-District Owned/Operated	Total
El Sausal Middle School	47	3	0	1	51
Harden Middle School	49	1	3	0	53
La Paz Middle School	46	3	0	0	49
Washington Middle School	46	2	3	0	51
Total	188	9	6	1	204

*Includes 49 portable classrooms.

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**Table 4
Classroom Inventory, High School Sites**

Site	Standard Classroom	Lab	ROP / ROTC	Band / Music	Drama / Theater	Special Day	Pull Out	Non-District	Total
Alisal High	70	13	1	1	1	0	4	2	92
Alvarez High	72	15	1	1	0	0	10	1	100
North Salinas High	55	19	0	1	1	2	5	3	86
Salinas High	71	17	0	3	1	0	4	0	96
Mount Toro High	5	6	0	0	0	0	1	0	12
Total	273	70	2	6	3	2	24	6	366

*Includes 140 portable classrooms.

2. Loading Standards

Table 5 lists the loading standards for 7-12 classrooms provided by the District and site administrators.

**Table 5
Loading Standards**

Grade Group (7-12)	Loading Standard
Standard Classroom (7-12)	27
Lab (9-12)	27
ROP / ROTC (9-12)	27
Band / Music / Choral (9-12)	27
Drama / Theater (9-12)	27
Special Day (7-12)	16
Physical Education (7-12)	100
Pull Out (7-12)	0
Non-District (7-12)	0

3. District Policies that Affect Capacity

The District currently operates pull-out type programs at all grade levels (i.e., students leave their regular classroom and occupy space in another classroom during the pull-out program). Examples of pull-out type programs that are in use are Detention Centers, Career Centers, Instructional Service Rooms and Leadership Rooms. The rooms used for these programs are not counted in calculating site capacities because they do not contribute to the effective capacity of the school.

B. Analysis of Portable Classroom Use, Age and School Site Student Densities

Two important issues that are relevant when evaluating the current capacity of a school district are student densities at school sites and the age of portable classrooms that have become too old to maintain. For example, a school site that has a large portion of its capacity in portable classrooms

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might have undesirably high student densities and maybe occupying portable classrooms that do not meet District standards and are overly expensive to preserve.

1. Inventory of Portable Classrooms by School Site

Table 6 identifies the use and age of portable classrooms on the District's school sites, in descending order of total portable classrooms on each site.

**Table 6
Portable Classroom Use**

School Site	Total Number of Portables	Number of Portables Over 20 Years Old	Total Number of Permanent Classrooms	Total Number of Classrooms	Percent of Total Classrooms that are Portable
Alvarez High	49	0	51	100	49%
Salinas High	32	0	64	96	33%
Alisal High	30	12	62	92	33%
North Salinas High	23	5	63	86	27%
Harden Middle	17	12	36	53	32%
El Sausal Middle	13	9	38	51	25%
Washington Middle	10	0	41	51	20%
La Paz Middle	9	0	40	49	18%
Mount Toro High	4	1	8	12	33%
Totals	203	39	403	606	32%

2. School Site Student Densities

A good measure of appropriate student density for a school site is to compare its site size with the site size recommended by the California Department of Education (CDE) for a school with equivalent enrollment. For example, the capacity of El Sausal Middle School is 1,269 students. The CDE recommends that a middle school of that capacity be on a site of 23.1 useable acres. Because El Sausal Middle School is on an 18 acre site, we can infer that it has a student density above the CDE recommended density. Conversely, schools with site sizes larger than the CDE recommended size have student densities below the CDE recommended levels.

Table 7 again lists the school sites in descending order of total portable classrooms. The table shows, for each school site, (1) its site size in acres, (2) the site size recommended by the CDE, given its planned grade configuration capacity as described in Part III of the Plan, and (3) the site size recommended by the CDE if all portable classrooms at the site were removed. Chart A shows the same information in bar graph form.

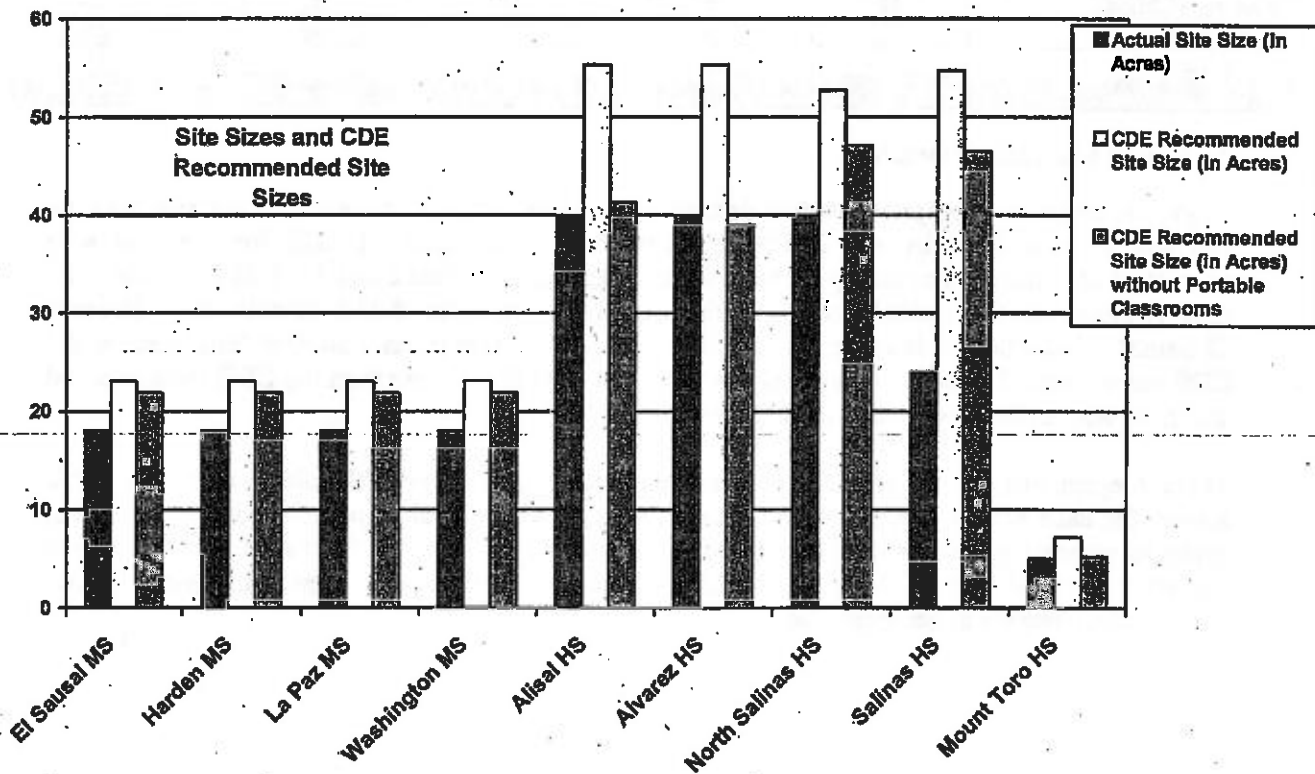
(continued on the next page)

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Table 7
School Site Size and CDE Recommended Site Size

Site	Site Size (in Useable Acres)	CDE Recommended Site Size (in Useable Acres)	CDE Recommended Site Size (in Useable Acres) without Portable Classrooms
El Sausal MS	18	23.1	21.9
Harden MS	18	23.1	21.9
La Paz MS	18	23.1	21.9
Washington MS	18	23.1	21.9
Alisal HS	40	55.3	41.3
Alvarez HS	40	55.3	39
North Salinas HS	40	52.7	47.1
Salinas HS	24	54.7	46.5
Mount Toro HS	5	7.2	5.2

Chart A
School Site Size and CDE Recommended Site Size



As Table 7 shows, all District schools are on school sites that are smaller than those recommended by the CDE and therefore, have student densities above the CDE recommendations. In addition, Table 7 shows that removing portable classrooms from Alvarez High would allow the site to be larger than the site size recommended by the CDE and therefore, have a student density below the

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CDE recommendation. Site densities at all other school sites will also benefit from the removal of portable classrooms. However, even if all portable classrooms are removed from these sites, they will still be on sites smaller than the site sizes recommended by the CDE. Alternatives for removing portable classrooms from campuses are discussed in Part Three of this Report. Table 8 identifies the minimum number of portable classrooms that would need to be removed in order to accomplish a site density consistent with the CDE recommendations.

**Table 8
Portable Classroom Removal and CDE Recommended Site Size**

Site	Site Size (in Acres)	Total Number of Portable Classrooms	Number of Standard Classroom/Portable Removed (Minimum)	Resultant CDE Recommended Site Size (in Acres)
El Sausal MS	18	10	10*	21.9
Harden MS	18	16	16*	21.9
La Paz MS	18	9	9*	21.9
Washington MS	18	10	10*	21.9
Alisal HS	40	27	27*	41.3
Alvarez HS	40	41	38	39
North Salinas HS	40	16	16*	44.5
Salinas HS	24	32	32*	44.5
Mount Toro HS	5	3	3*	5.2
Totals		16	6	

*The CDE recommended site size is still larger than the actual site size even when all portable classrooms are removed.

3. Removal of Portable Classrooms that have become too old to Maintain.

When removing portable classrooms the District should prioritize removal of classrooms that are greater than 20 years of age (See Table 6). The 20 year benchmark is an appropriate measure of age as it is the point in time that the State provides funding for major renovation and or replacement of portable classrooms.

Part Two – What do we need?

Summary of Key Points:

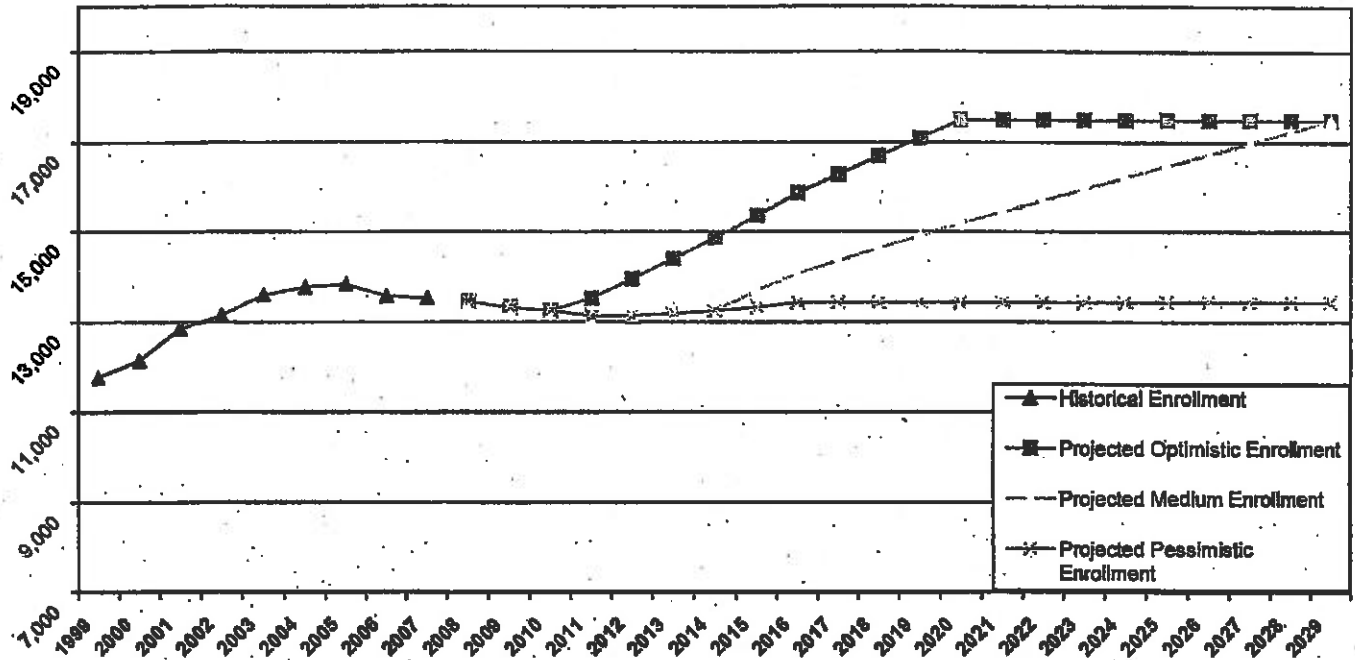
- The District's enrollment is projected to increase up to 29 percent over the twenty-two year period (from 13,558 to 17,496). Three enrollment forecasts are presented in the Plan, representing three different timing scenarios related to planned residential development in the District.
- Based on current classroom facilities and facility-use policies, the District requires additional capacity at the middle school grade level of up to 12 spaces (approximately 1 classroom) over the twenty-two year planning period should the District continue to use all portable classrooms at existing campuses. However, the District has 21 portable classrooms at middle school sites that are aging and will need to be removed, which will require the District to add up to 567 additional spaces, for a total of approximately 22 classrooms of additional capacity at the middle school grade level over the twenty-two year planning period. Additionally, as outlined in Part One, all District middle school sites are operating at densities well above those recommended by the CDE. Based on the District's permanent classroom facilities and facility-use policies, the District will require up to 1,205 spaces (approximately 45 classrooms) of additional capacity at the middle school grade level over the twenty-two year planning period.
- Based on current facilities and facility-use policies, the District will require up to 2,722 spaces (approximately 101 classrooms) of additional capacity at the high school grade level over the twenty-two year planning period. The District's high school site densities will also benefit from the removal of portable classrooms. Of the 138 portables on high school campuses, 18 portables are 20 years of age or older and should be the District's priority for removal. Based on the District's permanent classroom facilities and facility-use policies, the District will require up to 5,935 spaces (approximately 220 classrooms) of additional capacity at the high school grade level over the twenty-two year planning period.

Part Two is divided into two sections. The first section projects the District's enrollment over the next twenty-two years. The second section compares projected enrollment to current facility capacity and identifies the additional pupil capacity required over the next twenty-two years.

A. Enrollment History and Projection

The enrollment history and projection information used in the Plan was prepared by Lapkoff & Gobalet Demographic Research, Inc. (Demographers) and is included as an Appendix. The Demographers presented three different forecasts identified as "Optimistic", "Medium" and "Pessimistic". The three forecasts represent three different timing scenarios related to the planned residential development in West Boronda and the Future Growth Areas (FGAs) north and east of the City of Salinas. The "Optimistic" forecast assumes development completion by 2020, the "Medium" forecast assumes development completion by 2029 and the "Pessimistic" forecast assumes that no residential development will be completed by 2029. Chart B shows the District's projected 7-12 enrollment, and Charts C and D show the projected enrollment growth of the middle and high school grade groups.

Chart B
Historical and Projected 7-12 Enrollment, 2007 – 2029



(continued on the next page)

Table 9
Projected Optimistic Middle School Enrollment, 2007 – 2029

Year	Optimistic Enrollment Projections	Annual Percent Change	Increase or Decrease in Students
2007*	3,997	N/A	N/A
2008	3,995	(0.05%)	(2)
2009	3,965	(0.8%)	(30)
2010	3,956	(0.23%)	(9)
2011	4,014	1.47%	58
2012	4,164	3.74%	150
2013	4,382	5.24%	218
2014	4,542	3.65%	160
2015	4,667	2.75%	125
2016	4,770	2.21%	103
2017	4,874	2.18%	104
2018	4,977	2.11%	103
2019	5,080	2.07%	103
2020	5,184	2.05%	104
2021	5,184	0%	0
2022	5,184	0%	0
2023	5,184	0%	0
2024	5,184	0%	0
2025	5,184	0%	0
2026	5,184	0%	0
2027	5,184	0%	0
2028	5,184	0%	0
2029	5,184	0%	0

*Based on current CBEDS provided by District.

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Table 10
Projected Medium Middle School Enrollment, 2007– 2029

Year	Medium Enrollment Projection	Annual Percent Change	Increase or Decrease in Students
2007*	3,997	N/A	N/A
2008	3,995	(0.05%)	(2)
2009	3,965	(0.8%)	(30)
2010	3,956	(0.23%)	(9)
2011	3,911	(1.14%)	(45)
2012	3,958	1.2%	47
2013	4,072	2.88%	114
2014	4,128	1.38%	56
2015	4,252	3%	124
2016	4,323	1.68%	71
2017	4,395	1.67%	72
2018	4,466	1.62%	71
2019	4,537	1.59%	71
2020	4,609	1.59%	72
2021	4,673	1.39%	64
2022	4,736	1.35%	63
2023	4,800	1.35%	64
2024	4,864	1.33%	64
2025	4,928	1.32%	64
2026	4,992	1.3%	64
2027	5,056	1.28%	64
2028	5,120	1.27%	64
2029	5,184	1.25%	64

*Based on current CBEDS provided by District.

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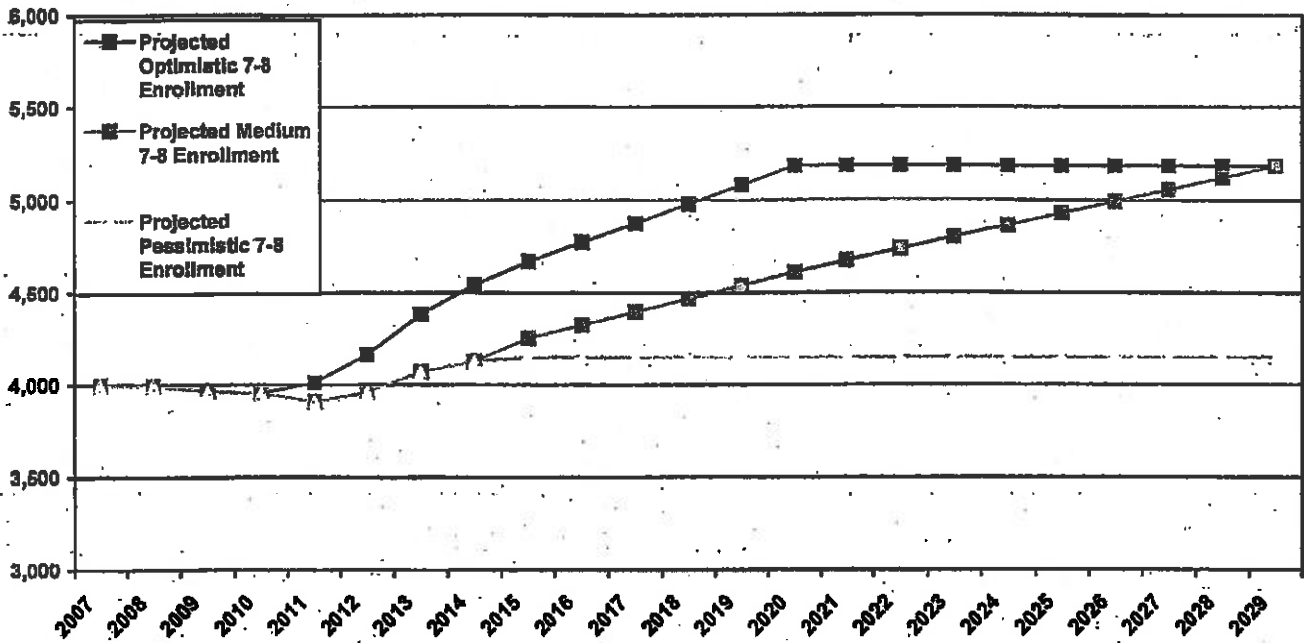
Table 11
Projected Pessimistic Middle School Enrollment, 2007 – 2029

Year	Pessimistic Enrollment Projections	Annual Percent Change	Increase or Decrease (in Students)
2007*	3,997	N/A	N/A
2008	3,995	(0.05%)	(2)
2009	3,965	(0.8%)	(30)
2010	3,956	(0.23%)	(9)
2011	3,911	(1.14%)	(45)
2012	3,958	1.2%	47
2013	4,072	2.88%	114
2014	4,128	1.38%	56
2015	4,150	0.53%	22
2016	4,150	0%	0
2017	4,150	0%	0
2018	4,150	0%	0
2019	4,150	0%	0
2020	4,150	0%	0
2021	4,150	0%	0
2022	4,150	0%	0
2023	4,150	0%	0
2024	4,150	0%	0
2025	4,150	0%	0
2026	4,150	0%	0
2027	4,150	0%	0
2028	4,150	0%	0
2029	4,150	0%	0

*Based on current CBEDS provided by District.

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Chart C
Projected Middle School Enrollment, 2007 – 2029



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Table 12
Projected Optimistic High School Enrollment, 2007 – 2029

Years	Projected Optimistic Enrollment	Annual Percent Change	Increase (or Decrease) in Students
2007*	9,561	N/A	N/A
2008	9,458	(1.08%)	(103)
2009	9,364	(0.99%)	(94)
2010	9,302	(0.66%)	(62)
2011	9,519	2.33%	217
2012	9,791	2.86%	272
2013	10,027	2.41%	236
2014	10,333	3.05%	306
2015	10,700	3.55%	367
2016	11,102	3.76%	402
2017	11,404	2.72%	302
2018	11,707	2.67%	303
2019	12,009	2.58%	302
2020	12,312	2.52%	303
2021	12,312	0%	0
2022	12,312	0%	0
2023	12,312	0%	0
2024	12,312	0%	0
2025	12,312	0%	0
2026	12,312	0%	0
2027	12,312	0%	0
2028	12,312	0%	0
2029	12,312	0%	0

*Based on current CBEDS enrollment provided by District.

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Table 13
Projected Medium High School Enrollment, 2007 – 2029

Year	Projected Medium Enrollment	Annual Percent Change	Increase or Decrease in Students
2007*	9,561	N/A	N/A
2008	9,458	(1.08%)	(103)
2009	9,364	(0.99%)	(94)
2010	9,302	(0.66%)	(62)
2011	9,216	(0.92%)	(86)
2012	9,186	(0.33%)	(30)
2013	9,119	(0.73%)	(67)
2014	9,123	0.04%	4
2015	9,454	3.63%	331
2016	9,760	3.24%	306
2017	9,967	2.12%	207
2018	10,173	2.07%	206
2019	10,380	2.03%	207
2020	10,587	2%	207
2021	10,778	1.8%	191
2022	10,970	1.78%	192
2023	11,162	1.75%	192
2024	11,353	1.71%	191
2025	11,545	1.69%	192
2026	11,737	1.66%	192
2027	11,928	1.63%	191
2028	12,120	1.61%	192
2029	12,312	1.58%	192

*Based on current CBEDS enrollment provided by District.

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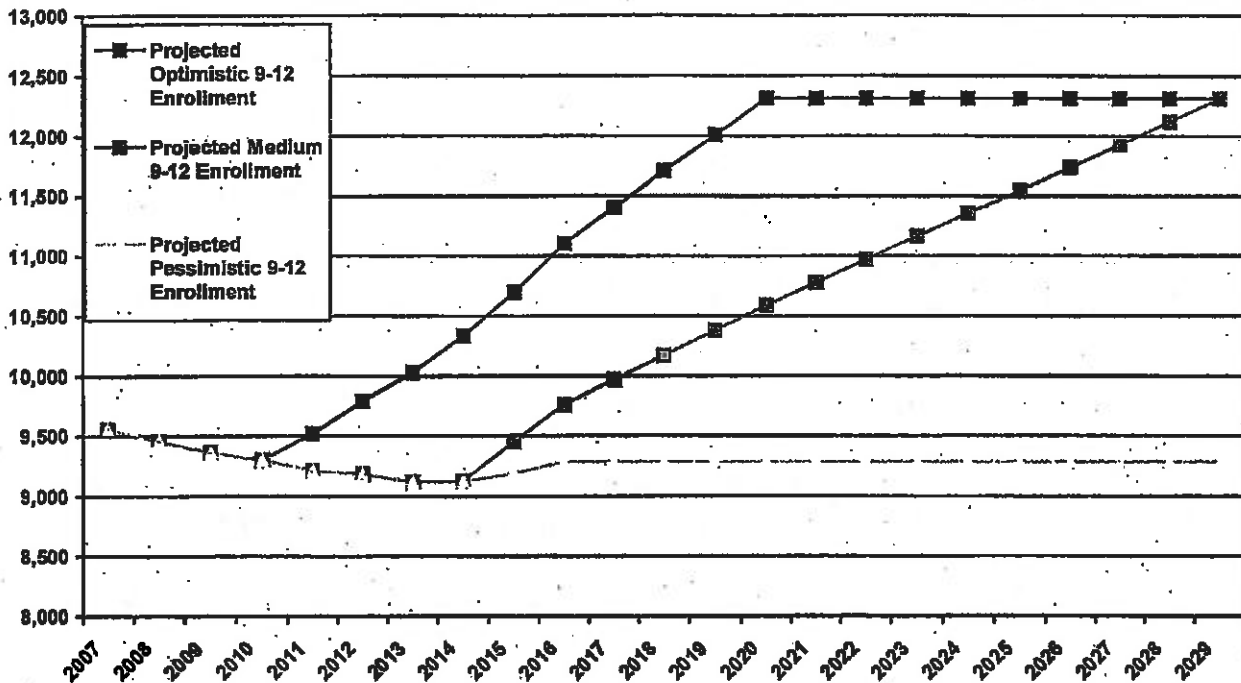
**Table 14
Projected Pessimistic High School Enrollment, 2007 – 2029**

Year	Projected Pessimistic Enrollment	Annual Percent Change	Increase (or decrease) in Students
2007*	9,561	N/A	N/A
2008	9,458	(1.08%)	(103)
2009	9,364	(0.99%)	(94)
2010	9,302	(0.66%)	(62)
2011	9,216	(0.92%)	(86)
2012	9,186	(0.33%)	(30)
2013	9,119	(0.73%)	(67)
2014	9,123	0.04%	4
2015	9,187	0.7%	64
2016	9,287	1.09%	100
2017	9,287	0%	0
2018	9,287	0%	0
2019	9,287	0%	0
2020	9,287	0%	0
2021	9,287	0%	0
2022	9,287	0%	0
2023	9,287	0%	0
2024	9,287	0%	0
2025	9,287	0%	0
2026	9,287	0%	0
2027	9,287	0%	0
2028	9,287	0%	0
2029	9,287	0%	0

*Based on current CBEDS enrollment provided by District.

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Chart D
Projected High School Enrollment, 2007–2029



B. Required New Capacity

The additional pupil capacity required by the District over the next twenty-two years is calculated by comparing the projected enrollment against the pupil capacities outlined in Part One.

The enrollment projection relies largely on projections of future residential development. If actual development rates are greater or lesser than the Plan's projection, then the District will have a greater or lesser need for additional school facilities, respectively. In addition, if other factors in the District such as, student generation rates of residential units, residential vacancy rates, private school attendance, etc., deviate from historical patterns, the enrollment projection in this Plan will need to be modified.

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The capacity figures are based on the loading standards and District policies outlined in Part One. If the District modifies its use of facilities (e.g., reduces/increases the number of portable classrooms on some sites), the District will have a greater or lesser need for additional school facilities. Some possible facility policy changes that will affect the required amount of additional capacity are identified along with the Facility Plan outlined in Part Three.

Table 15
Required (or Excess) Capacity, in Numbers of 7-8 Students/Classrooms
(Based on all classrooms within District)

Grade Level	Forecast	5 Year		10 Year		15 Year		22 Year	
		Students	CRs	Students	CRs	Students	CRs	Students	CRs
7-8	Optimistic	(1,008)	0	(298)	0	12	1	12	1
7-8	Medium	(1,214)	0	(777)	0	(436)	0	12	1
7-8	Pessimistic	(1,214)	0	(1,022)	0	(1,022)	0	(1,022)	0

Table 16
Required (or Excess) Permanent Capacity, in Numbers of 7-8 Students/Classrooms
(Based on all permanent classrooms within District)

Grade Level	Forecast	5 Year		10 Year		15 Year		22 Year	
		Students	CRs	Students	CRs	Students	CRs	Students	CRs
7-8	Optimistic	185	7	895	34	1,205	45	1,205	45
7-8	Medium	(21)	0	416	16	757	29	1,205	45
7-8	Pessimistic	(21)	0	171	7	171	7	171	7

Table 17
Required (or Excess) Capacity, in Numbers of 9-12 Students/Classrooms
(Based on all classrooms within District)

Grade Level	Forecast	5 Year		10 Year		15 Year		22 Year	
		Students	CRs	Students	CRs	Students	CRs	Students	CRs
9-12	Optimistic	201	8	1,814	68	2,722	101	2,722	101
9-12	Medium	(404)	0	377	14	1,380	52	2,722	101
9-12	Pessimistic	(404)	0	(303)	0	(303)	0	(303)	0

Table 18
Required (or Excess) Permanent Capacity, in Numbers of 9-12 Students/Classrooms
(Based on all permanent classrooms within District)

Grade Level	Forecast	5 Year		10 Year		15 Year		22 Year	
		Students	CRs	Students	CRs	Students	CRs	Students	CRs
9-12	Optimistic	3,414	127	5,027	187	5,935	220	5,935	220
9-12	Medium	2,809	105	3,590	133	4,593	171	5,935	220
9-12	Pessimistic	2,809	105	2,910	108	2,910	108	2,910	108

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At the middle school level, based on the District's total classroom facilities and facility-use policies, the District requires additional capacity at the middle school grade level of up to 12 spaces (approximately 1 classroom) over the twenty-two year planning period should the District continue to use all portable classrooms at existing campuses. However, the District has 21 portable classrooms at middle school sites that are aging and will need to be removed, which will require the District to add up to 567 additional spaces, for a total of approximately 22 classrooms of additional capacity at the middle school grade level over the twenty-two year planning period. Based on the District's permanent classroom facilities and facility-use policies, the District will require up to 1,205 spaces (approximately 45 classrooms) of additional capacity at the middle school grade level over the twenty-two year planning period.

At the high school level, based on the District's total classroom facilities and facility-use policies, the District will require up to 2,722 spaces (approximately 101 classrooms) over the twenty-two year planning period. Of the 138 portables on high school campuses, 18 portables are 20 years of age or older and should be the District's priority for removal. Based on the District's permanent classroom facilities and facility-use policies, the District will require up to 5,935 spaces (approximately 220 classrooms) over the twenty-two year planning period.

Alternative plans to provide facilities for these students are outlined in Part Three.

Part Three – What can we do to meet the need?**Summary of Key Points:**

- The District's Facility Plan for the next twenty-two years includes a new middle school and two new high schools. This plan will allow the District to house all students over a twenty-two year planning period and begin to eliminate portable classrooms that are too old to maintain and create site densities that are in excess of those recommended by the CDE. The District can eliminate up to 36 portable classrooms (including 21 portable classrooms that are too old to maintain) at middle school and up to 28 portable classrooms (including 18 portable classrooms that are too old to maintain) at high school, which will greatly reduce middle and high school site densities.
- Two additional options are also discussed that would allow the District to further reduce site densities. Under Option #1 the District would construct a second new middle and third new high school. At the middle school level, the District would be able to remove up to 9 additional portable classrooms, providing the District with 773 additional seats of capacity. At the high school level, the District would be able to remove up to 74 additional portable classrooms, providing the District with 24 additional seats of capacity.
- Under Option #2 the District would construct a fourth new high school, which would allow the District to remove up to 11 additional portable classrooms, providing the District with 1,727 additional seats of capacity.

This section presents a Facility Plan, the goal of which is to house all students over a twenty-two year planning period. The Facility Plan provides all the required new capacity at the middle and high school levels.

When possible, the Facility Plan outlines strategies for eliminating portable classrooms that are too old to maintain and portable classrooms that create site densities that are in excess of those recommended by the CDE (see Tables 6, 7 and 8 and Chart A in Part One of the Plan). Implementation of the Facility Plan will allow the District to remove some portable classrooms at existing campuses.

As outlined in Part Two of the Plan, the Demographer has outlined three potential enrollment growth scenarios (optimistic, medium and pessimistic) which differ based on the varied timing of development. The Facility Plan outlined in this section assumes the "optimistic" forecast as the District needs to plan for peak projected enrollment. If enrollment growth should occur at a different pace than the "optimistic" forecast suggests, the District can adjust its Facility Plan accordingly.

In addition to providing the capacity required to house future enrollment, the District has identified three other goals for a Facility Plan. They are:

- Eliminate portable classrooms that have become too old to maintain and reduce student densities on school sites which exceed the CDE recommendations,

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- Free up classroom space that can be used for special programs,
- Take maximum advantage of State school facility funds.

A. Facility Plan

The elements of the Facility Plan designed with the above goals in mind are:

- A new middle school with a capacity of 1,000 students,
- A new high school with a capacity of 1,500 students and a second high school with the capacity of 2,000 students.

This facility plan provides sufficient capacity to house all projected middle and high school students and takes steps towards eliminating/converting portable classrooms.

Table 19 shows how the District's Facility Plan might be implemented over the twenty-two year period.

**Table 19
Implementation of the Facility Plan**

Year	Projected Middle School Facility Need	Projected High School Facility Need	Action	Projected Middle School Seats	Projected High School Seats	Resulting Overall School Facility Need	Resulting Overall School Facility Seats
2012	(1,008)	201	No facilities needed at middle school. Open the District's new High School (1,500 seats) and remove up to 14 portables from existing high school sites, all of which are too old to maintain.	0	1,500	(1,008)	(921)
2013	(790)	(685)	No facilities needed at high school. Open the District's new middle school (1,000 seats) and remove up to 36 portables from existing middle school sites, 21 of which are too old to maintain.	1,000	0	(818)	(685)
2016	(430)	390	No facilities needed at middle school. Open additional high school (2,000 seats) and remove up to 14 portables from existing high school sites, 4 of which are too old to maintain.	0	2,000	(430)	(1,232)
2029	(16)	(22)	No facilities need.	0	0	(16)	(22)

As shown in the Table 19, the Facility Plan will house all students projected over the twenty-two year planning period.

At the middle school grade levels, if the District constructs a new middle school with a capacity of 1,000 students, it can eliminate up to 36 portables at existing middle school sites, greatly reducing middle school site densities. Of the 36 portables that can be removed from middle school campuses, 21 portables are too old to maintain and should be the District's priority for removal.

At the high school grade levels, if the District constructs two new high schools (High School #1 with a capacity of 1,500 students and High School #2 with a capacity of 2,000 students) it can eliminate up to 28 portables at existing high school sites, greatly reducing high school site densities. Of the 28 portables that can be removed from high school campuses, 18 portables are too old to maintain and should be the District's priority for removal.

B. Additional Facility Options

Although the Facility Plan outlined above houses all students anticipated over the twenty-two year planning period, additional new school facilities are needed to allow the District to eliminate/convert additional portable classrooms at existing school sites that have densities above those recommended by the CDE. The following options would allow the District to eliminate/convert additional portable classrooms at existing school sites.

- **Option #1**

- A second new middle school with a capacity of 1,000 students.

- A third new high school with a capacity of 2,000 students.

This option would allow the District to remove an additional 9 portable classrooms at middle school sites and an additional 74 portable classrooms at high school sites. This option would also provide the District with an additional 773 seats of middle school capacity and 24 seats of high school capacity beyond the twenty-two year facility need.

- **Option #2**

- Option #1 plus a fourth new high school with a capacity of 2,000 students.

This option would allow the District to remove an additional 11 portable classrooms at high school sites and would provide the District with an additional 1,727 seats of high school capacity beyond the twenty-two year facility need.

Part Four – How do we pay for it?

Summary of Key Points

- The estimated cost of the District's Facility Plan for required new capacity is \$193.8 million.
- The estimated cost of additional facilities needed to reduce District site densities to align with site densities recommended by the CDE (Option #1 and Option #2) is \$229.3 million.
- The total estimated cost of the District's Facility Plan and Option #1 and Option #2 is \$423.2 million.
- The primary sources of funds for the District's facility needs are anticipated to be (1) the State School Facility Program, (2) Developer Fees and (3) existing General Obligation Bond funds.
- Projected funding from the State School Facility Program, Developer Fees and existing General Obligation Bond funds are estimated at \$119.5 million for the District's Facility Plan and \$110.2 million for the Option #1 and Option #2, for a total of \$229.8 million.
- The District's projected funding falls short of the District's facility revenue needs. The District requires approximately \$74.3 million in additional funding for the District's Facility Plan and \$119.1 million of additional funding for Option #1 and Option #2, for a total of \$193.4 million in additional funding need. The District will need to investigate additional revenue sources such as future general obligation bonds, Mello-Roos financing, etc. to fund the District anticipated facility needs.

Part Four is divided into two sections. The first section estimates the cost to provide the school facilities presented in Part Three. The second section projects the funds available to the District for facility projects. Both funding and cost estimates are calculated in current dollars assuming that cost and funding inflation will occur at a similar rate.

A. Cost Estimates

1. Facility Plan

The information in Table 20 shows that the estimated cost of the District's Facility Plan outlined in Part Three is \$193,850,000. Cost estimates are based on District estimates to construct new middle and high school facilities.

(continued on the next page)

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**Table 20
Cost Estimate of District's Facility Plan**

Facility Plan		
Site	Project Description	Cost
New Middle School #1	New middle school with a capacity of 1,000 students.	\$30,350,000
New High School #1**	New high school with a capacity of 1,500 students.	\$64,000,000
New High School #2	New high school with a capacity of 2,000 students.	\$99,500,000
Sub Total		\$193,850,000
Option #1		
New Middle School #2	New middle school with a capacity of 1,000 students.	\$30,350,000
New High School #3	New high school with a capacity of 2,000 students.	\$99,500,000
Sub Total		\$129,850,000
Option #2		
New High School #4	New high school with a capacity of 2,000 students.	\$99,500,000
Sub Total		\$99,500,000
Total		\$25,200,000

*School facility costs are based on estimates provided by the District. Actual cost will vary based on timing of construction.

**The District owns the site for New High School #1.

2. Total Costs of Option #1 and Option #2

As the above cost estimates show, the costs of providing the additional pupil capacity outlined in Option #1 and Option #2 discussed in Part Three of the Plan are \$129,850,000 and \$99,500,000, respectively.

B. Funding Sources

1. School Facility Program

The State School Facility Program (SFP) is a likely funding source for the District's projects. This section estimates the SFP funding that will be available to the District. The estimates assume that the District has new construction eligibility and that the State will have new construction funds in the years that the District will likely apply for State funding.

The SFP calculates enrollment projections and facility capacities based on formulas in State law. The amount of SFP funding available to districts is then determined by (1) subtracting projected enrollment from capacity to determine the number of unhoused students in a district and (2) multiplying unhoused students by per pupil grant amounts. The formulas used in the SFP to determine enrollment projections and facility capacities are not appropriate to determine true local need for school facilities. The enrollment and capacity figures used in determining amounts of SFP funding should not be used for long term planning purposes.

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The SFP is governed by the State Allocation Board (SAB), which will continue to make changes to the program. Eligibility for funding should be re-examined on an annual basis, or when the program changes. Funding under the SFP is available when the District has Division of the State Architect (DSA) approved construction plans.

The amounts in Table 21 and Table 22 are estimates of the amount of funding available to the District in the years that it will apply for State funding based on the Implementation Plan and Option #1 and Option #2 outlined in Part Three. The amounts assume that the District will have new construction eligibility in the years that it will likely apply for State funding, based on the Implementation Plan outlined in Part Three.

Table 21
Facility Plan
School Facility Program Estimated New Construction Funding

Grade Group	2012/13	2013/14	2016/17	Total
7-8	\$0	\$15,273,668	\$0	\$15,273,668
9-12	\$28,977,300	\$0	\$38,636,400	\$67,613,700
Total	\$28,977,300	\$15,273,668	\$38,636,400	\$82,887,368

Table 22
Option #1 and Option #2
School Facility Program Estimated New Construction Funding

Grade Group	2020/21	2023/24	2029/30	Total
7-8	\$15,273,668	\$0	\$0	\$15,273,668
9-12	\$0	\$38,636,400	\$38,636,400	\$77,272,800
Total	\$15,273,668	\$38,636,400	\$38,636,400	\$92,546,468

The potential SFP new construction funding outlined in Table 21 and Table 22 includes 50% of new construction costs as defined by the SFP because the SFP is a match program. The table also includes estimated costs for site development and site acquisition costs relevant to the District's new construction projects. The District will be limited to project capacity when accessing State funds (i.e., maximum grant funding on a middle school with 1,000 seats is 1,000 grants)

2. Developer Fees

The District currently collects developer fees on commercial/industrial development and residential development. The District should continue to collect the maximum fee allowed by law and should re-examine development trends on an annual basis.

Projected revenue from developer fees over the twenty-two year planning period is estimated based on (1) current developer fee fund balances and (2) developer fee revenue projections based on the District's current and historical collection rates and anticipated residential development as outlined in the Demographer's "optimistic" forecast. The amounts in Table 23 and Table 24 are estimates of

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the amount of developer fee funding available to the District in the years that it will apply for State funding based on the Implementation Plan and Option #1 and Option #2 outlined in Part Three. The District anticipates using this revenue on the District's projects outlined in this Plan. The District may also use some of this revenue towards other projects not related to the growth needs outlined in this Plan. The ability of the District to access revenue from developer fees depends on development trends in the District. Should development trends deviate from the development assumptions in the District's "optimistic" forecast, the developer fee revenue estimated in this Plan will need to be modified.

**Table 23
Facility Plan
Estimated Developer Fee Revenue**

Grade Group	2012/13	2013/14	2016/17	Total
7-12	\$9,688,291	\$4,169,145	\$12,507,436	\$26,364,872

**Table 24
Option #1 and Option #2
Estimated Developer Fee Revenue**

Grade Group	2012/13	2013/14	2016/17	Total
7-12	\$16,676,581	\$344,504	\$689,008	\$17,710,093

3. General Obligation Bonds

School districts can, with the approval of either two-thirds or 55 percent of its voters, issue general obligation bonds that are paid for out of property taxes. The District gained voter approval for a Proposition 39 General Obligation Bond in March 2002, and another General Obligation Bond in November 2002. The District has \$10,346,000 available from General Obligation Bond funds to use towards future middle schools. The District may explore a future ballot measure to provide funding to allow the District to construct needed new school facilities and provide funding for other District facility needs.

4. Parcel Taxes

Approval by two-thirds of the voters is required to impose taxes that are not based on the assessed value of individual parcels. While these taxes have been occasionally used in school districts, the revenues are typically minor and are used to supplement operating budgets. The District does not currently collect parcel tax revenue, however, could investigate a parcel tax as a revenue source to allow the District to construct needed new school facilities and provide funding for other District facility needs.

5. Mello-Roos Community Facilities Districts

This alternative uses a tax on property owners within a defined area to pay long-term bonds issued for specific public improvements. Mello-Roos taxes require approval from two-thirds of the voters

Salinas Union High School District – School Facility Master Plan – March 2008

(or land owners if fewer than 12) in an election. The District currently does not have any Mello-Roos authorizations, however, could investigate a parcel tax as a revenue source to allow the District to construct needed new school facilities and provide funding for other District facility needs.

6. Other Agency Joint Participation

Other agencies that have similar needs may be willing to share the cost of providing new or modernized facilities in exchange for joint-use. The District may be able to enter into joint-use with the City of Salinas or the County of Monterey for parks and recreational facilities.

7. Asset Management

The District has not identified any unused assets that might be used to generate revenue for facility funding.

8. Debt Financing

The District has utilized Municipal Leases and Certificates of Participation (COPs) to finance some facilities. This type of debt financing should only be used as "bridge" funding until permanent funding becomes available. The District should proceed with caution when using Municipal Lease, COPs and other debt financing, as they are reliant on development growth assumptions that if not realized may impact the District's general fund.

**Table 25
Estimated Total Facility Funding**

Facility Plan	Category	Funding
	State School Facility Program	\$82,887,368
	Developer Fees	\$26,364,872
	General Obligation Bond Funds	\$10,346,000
	Subtotal	\$119,598,240
	Option #1 and Option #2	
	State School Facility Program	\$92,546,468
	Developer Fees	\$17,710,093
	Subtotal	\$110,256,561
	Total	\$229,854,801

**Table 26
Facility Cost and Facility Funding Comparison**

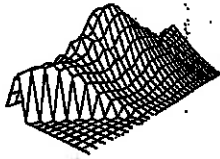
	Facility Costs	Facility Funding	Difference
Facility Plan	\$193,850,000	\$119,598,240	\$74,251,760
Option #1 and Option #2	\$229,350,000	\$110,256,561	\$119,093,439
Total	\$423,200,000	\$229,854,801	\$193,345,199

As outlined in Table 26, the District's projected funding falls short of the District's facility revenue needs. The District requires approximately \$74.3 million in additional funding for the District's Facility Plan and \$119.1 million of additional funding for Option #1 and Option #2, for a total of \$193.4 million in additional funding need. The District will need to investigate additional revenue sources such as future general obligation bonds, Mello-Roos financing, etc. to fund the District anticipated facility needs.

APPENDIX

**DEMOGRAPHIC ANALYSIS AND FORECASTS FOR
SALINAS UNION HIGH SCHOOL DISTRICT
(January, 14, 2008)**

*Prepared by
Lapkoff & Gobalet Demographic Research, Inc.*



Demographic Analysis and Forecasts for Salinas Union High School District

January 14, 2008

Executive Summary

The purpose of this report is to describe our new middle and high school enrollment forecasts for Salinas Union High School District (SUHSD, the District). It presents both the enrollment figures and the details of our forecast methodology.

If no new housing were built in West Boronda or in the Future Growth Areas (FGAs) north and east of the city of Salinas, we would expect that, by 2016, SUHSD middle school enrollments would increase by about 150 and high school enrollments would fall by about 270 (see Table 9). However, when all planned housing is built in the FGAs and West Boronda, total enrollments will increase by about 1200 middle school students and 2,800 high school students (see Table 11). The very earliest this development could be completed is 2020. The timing of housing construction in the FGAs is uncertain, so we have developed three different timing scenarios. One scenario assumes completion by 2020, another by 2029, and a third assumes that none of the housing is occupied through the end of our forecast period.

The Salinas area experienced severe enrollment declines between 2003 and 2005. This coincided with the completion of three major housing developments: CreekBridge, Harden Ranch, and Williams Ranch. The declines seem to have resulted from some community-wide changes that caused families to leave SUHSD or to shift their children out of the public schools, and there was no offsetting enrollment growth from new housing. Meanwhile, there has been another demographic shift, and most measures of enrollment change and migration have returned to more historically normal levels. We expect future enrollments to be relatively stable in the absence of housing growth. When the planned housing is built over the next decade or two, enrollments will grow, though the timing and pace of that development cannot be not known at this point.

We have identified the feeder district in which each past and current SUHSD student lived and combined their numbers with past and current enrollments (from CBEDS) in each feeder's schools. The result was hypothetical K-12 populations in each feeder.¹ Our analyses and forecasts are for these populations. In the end, we combine the populations for overall middle and high school SUHSD forecasts. There are several methodological issues associated with combining the populations, but we believe this approach produces the most accurate and informative forecasts.

¹ The elementary populations are "hypothetical" in that we assume each feeder district's enrollments represent students enrolled in its schools. The SUHSD middle and high school enrollment numbers we use reflect actual residents of the feeder districts.

An important assumption in our forecasts concerns whether the recently constructed large developments (CreekBridge, Harden Ranch, and Williams Ranch) will experience enrollment changes over time. Sometimes new developments undergo an "aging" effect, which causes high school enrollments to be low at first, to peak about 10 years after the homes are built, and then to decline. The aging effect occurs if a large share of the homebuyers has very young children. We have studied the older parts of CreekBridge, Harden Ranch, and Williams Ranch to see how SUHSD enrollments changed as the housing aged, and found inconclusive evidence of aging there. In the forecasts presented here, we have assumed that enrollments from CreekBridge, Harden Ranch, and Williams Ranch will remain constant at their current levels. Also, we assume that once housing in Monte Bella, West Boronda, and the FGAs is fully occupied, no aging effect will occur. This assumption should be monitored over time, as more data become available.

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Introduction

Forecasting SUHSD enrollments presents methodological challenges. First, a large number of housing units were built in the District in recent decades.² As a consequence, public school enrollments grew and this growth masked underlying demographic trends. We need to understand these underlying trends in order to forecast future enrollments.

Our general approach involves identifying exactly where students live in order to separate those living in recently built housing from those occupying older housing. However, we lack address data for students enrolled in each of SUHSD's seven elementary feeder districts, and cannot determine the number of these students living in recently built homes. This presents a second methodological challenge because we generally use data for students living in elementary feeders as a basis for forecasting future high school students.

A third complicating factor is that a very large number of homes is expected to be built in the Future Growth Areas (FGAs) to the north and east of Salinas. The new housing will increase SUHSD's enrollments. The timing of construction is uncertain, as are the number and type of housing units. As a result, we present three different scenarios about the timing of the projects. The most pessimistic forecast assumes no development, or at least no development during our forecast period.

This report is divided into the following sections:

1. Description of overall enrollment trends,
2. Discussion of the impact of recent housing growth on enrollments,
3. Description of future housing developments,
4. Explanation of the forecast methodology,
5. Historical analyses and forecasts by SUHSD elementary feeder district, and
6. Forecasts for SUHSD middle and high school enrollments through fall 2016.

Acknowledgments

This report was done under the direction of Karen Luna, SUHSD Manager of Planning/Facilities, and Roger C. Antón, Jr., SUHSD Superintendent, and in collaboration with Matthew A. Pettler, Planning Services Director, School Facility Consultants.

We are grateful for assistance provided by the following individuals: Charles A. Lerable, GIS Administrator, City of Salinas Information Systems; Bob Schubert, Monterey County Planning Department; Jerry Hernandez, Monterey County Housing and Redevelopment Office; Mely Lat, Supervisor, District Advisory Services, Monterey County Office of Education; and Bill Satterlee, CreekBridge Homes. Mary Johnston, Sorrento (Monte Bella) Community Sales Manager, Standard Pacific Homes; Monica Faranda, Monte Bella Sales Manager; Mimi Gitchev, Spreckels Community Sales Manager, Standard Pacific Homes; Fred, Flor de Salinas Sales; and Ana Aguillon, SUSHD Accountant, also provided needed information.

² The completion of several major projects by 2004 and 2005 has contributed to the cessation of enrollment growth.

Overall Enrollment Trends

After decades of enrollment growth, SUHSD enrollment trends have reversed. Middle school enrollments (seventh and eighth grades) peaked in 2003 at 4,472 students. By fall 2007, enrollments had fallen 11 percent, to 3,997. Meanwhile, high school enrollments peaked in 2004 and remained at that level for the next three years. See Chart 1.

In addition to looking at overall enrollment trends, we also study what demographers call "grade progressions." This measure compares the number of students in one grade with the number of students in the following grade the following year. For example, we compare the number of ninth graders in fall 2006 with the number of tenth graders in fall 2007.

Grade progressions are important for two reasons. First, assumptions about their future levels are a key element of the enrollment forecast model. In the standard forecast methodology, we start with the current number of students in each grade and advance them one grade to obtain next year's enrollments. We apply grade progression rates or ratios to adjust the number of students as they progress one year. The second reason the grade progressions are important is that they indicate demographic behavior of the population, including the population's mobility, preferences regarding private schooling, and the district's retention policies.

Chart 2 shows grade progressions between fall 2006 and fall 2007 for the combination of SUHSD students and students enrolled in all its elementary feeder districts. Later we report this information for each of the five largest feeders, which will be more informative. Note that all of the grade progressions except for K>1 are negative, meaning that more students left SUHSD and its feeders than moved in. This means that households with children are migrating out of the District, or are switching from public to private schools.

Chart 1

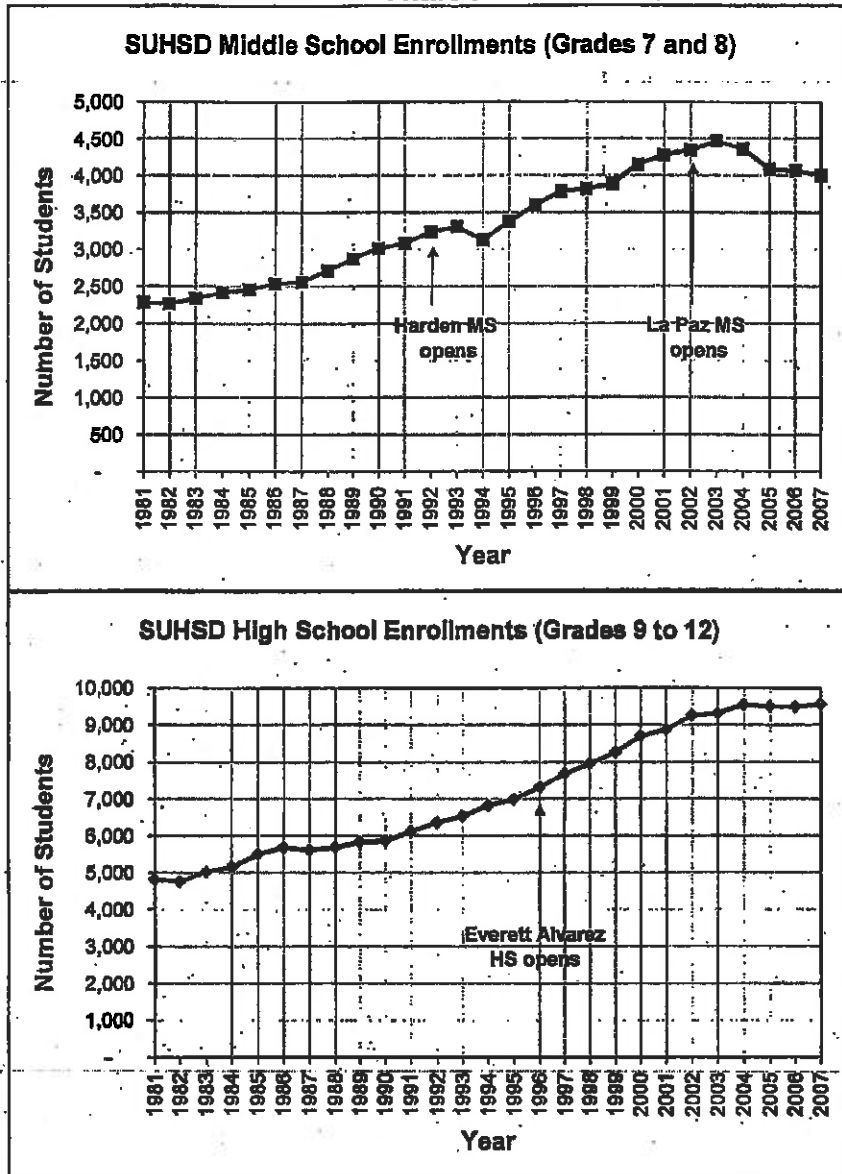


Chart 2

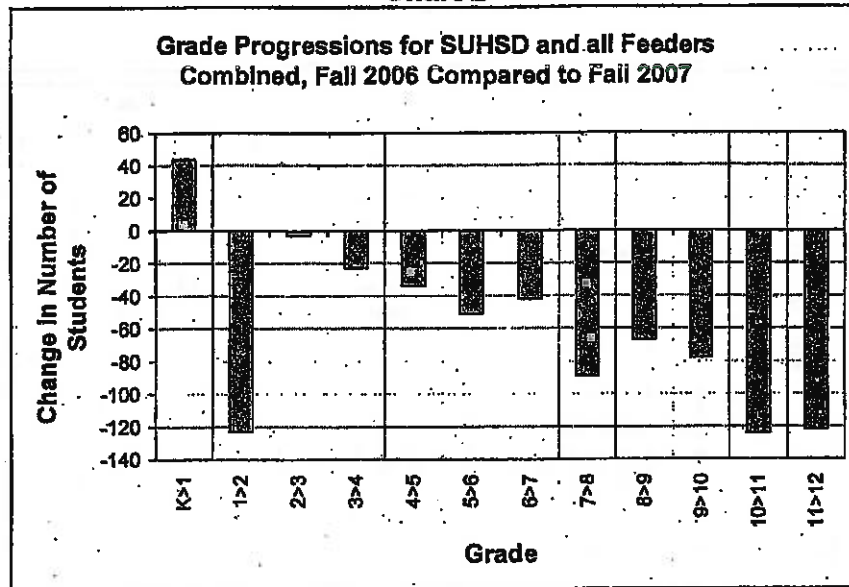


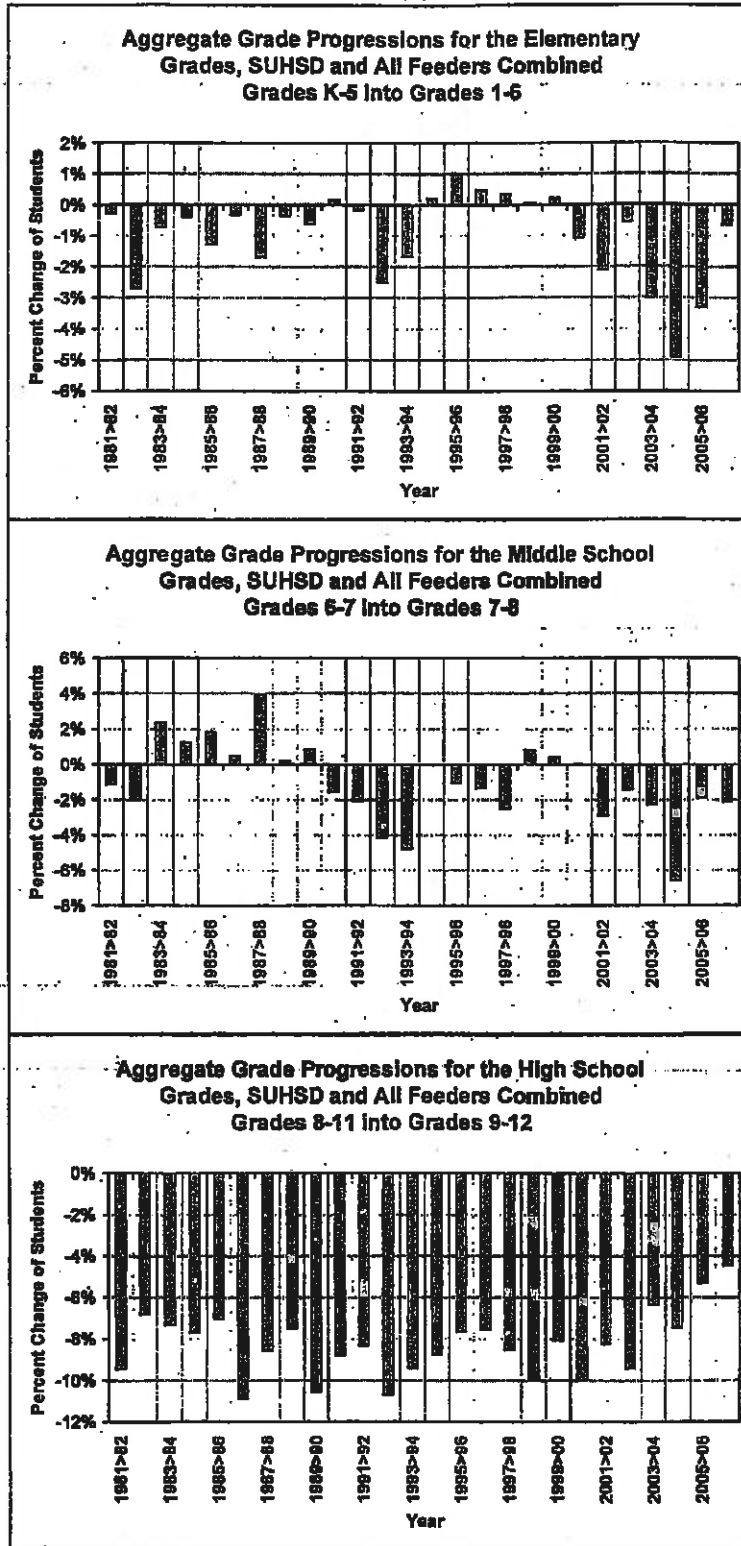
Chart 3 summarizes the grade progressions for each school level from 1981 to 2007. Grade progressions for the most recent pair of years (2006>2007) are shown in the farthest right column of each graph. We show percent changes in the number of students in each school level from one year to the next, beginning with the 1981>1982 progressions.

The most recent set of elementary and high school grade progressions show that fewer students left the public school districts than in most recent years; they now resemble the historic average. Elementary and middle school grade progressions were especially low between 2003 and 2005. At the high school level, grade progressions have been steadily improving (fewer students have left) during the last four years, possibly a result of the change in SUHSD's retention policy.³

These grade progressions are a result of many factors, one of which is housing growth. As new developments are built, if families move into the area from places outside the District, enrollments grow and the grade progressions increase. These increases can mask an underlying trend, such as the enrollment decline often associated with aging of housing. When we can, therefore, we eliminate the effect of housing growth from the grade progressions and study grade progressions in newer and older housing separately. When we subtract students from the larger new housing areas (CreekBridge, Harden Ranch, Williams Ranch, Monte Bella), we can study underlying demographic trends in the older housing areas. We have done this in our analyses of feeder district and SUHSD enrollments. But first, we discuss housing growth.

³³ Around 2003, the District began to advance students one grade for each year of enrollment, regardless of the number of credits earned.

Chart 3



Impact of Recent Housing Growth on Enrollments

As we show below, SUHSD enrollment growth in the 1990s and early 2000s largely resulted from occupancy of new housing in several large developments. In 1984, the City of Salinas annexed CreekBridge and Williams Ranch, and in 1989 it annexed Harden Ranch. Together, these three developments contain approximately 7,229 units, which is currently 17 percent of the city's housing stock. CreekBridge took the longest to build, with most units constructed between 1989 and 2004. Most of Williams Ranch was built between 1995 and 2002, and most of Harden Ranch was built from 1993 to 2004. Chart 4 shows the annual number of units built in each of these developments, and Map 1 shows their location.

Note that all three developments were completed by the mid-2000s, and at the same time SUHSD enrollment growth slowed.

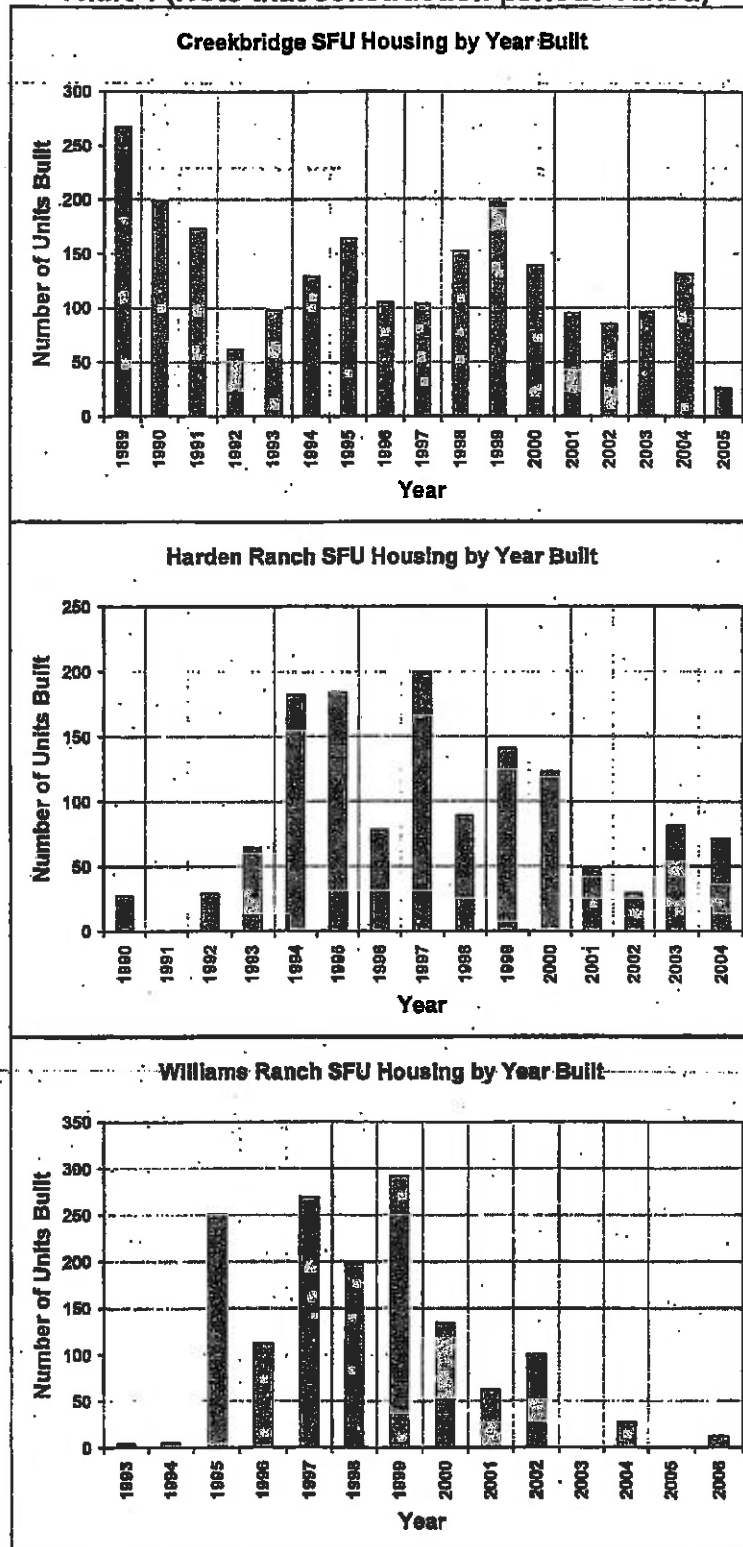
Table 1 shows the number of students generated from the three large developments built recently in Salinas, along with the student yields from each project (number of students divided by number of housing units). In fall 2007, 1,829 high school students and 623 middle school students attended SUHSD schools. Overall, the high school yield is .25, while the middle school yield is about half that for feeders with middle school students enrolled in SUHSD schools.

Table 1

Enrollments and Yields in Creekbridge, Harden Ranch, and Williams Ranch, Fall 2007

	# Units	Middle School Students		High School Students	
		# Students	Yield	# Students	Yield
Creekbridge	2,598	259	0.10	685	0.26
Harden Ranch	2,561	not applicable		452	0.18
Williams Ranch	2,070	364	0.18	692	0.33
Total	7,229	623	0.13	1,829	0.25

Chart 4 (Note that construction periods varied)



Map 1



Future Housing Developments

Under Construction

New housing continues to be built in Salinas, but at a slower pace. The main development now underway is Monte Bella, with 853 total housing units (see Map 2). About 45 percent of the project was completed by October 2007.⁴ The pace of construction has slowed, however, as a result of a poor housing economy.

Future Growth Areas

The City of Salinas has identified three "Future Growth Areas" (FGAs) to the north and east of its current boundaries. These developments were submitted to LAFCO (Local Agency Formation Commission) recently, and, if approved, will then go to the City for consideration. In due course, Salinas will annex the FGAs, and it is anticipated that construction will occur simultaneously in all three. Map 2 shows these areas.

The number of projected housing units in the three FGAs is now estimated at 11,500.⁵ Most will be single-family homes, but there will also be a significant number of apartments. The number and mix of housing types may change by the time the developments are approved.

As housing in these areas is constructed, Salinas' population and student enrollments will grow. The earliest these developments could begin to be occupied is 2011, and construction is expected to take at least 10 years to complete.⁶ Perhaps a more likely estimate for first occupancy is closer to 2015 or even 2020.

West Boronda

Plans for the West Boronda area should be finalized by the end of 2008. It is anticipated that occupancy will begin by 2011, and will take 10 years to complete. The Boronda area is within Salinas City School District, and will contribute both high school and middle school students to SUHSD.

Rancho San Juan

The proposed Rancho San Juan/Butterfly Village development is located in the county area north of Salinas, in the Santa Rita and Lagunita School Districts. Plans currently call for 1,660 homes.⁷ This development is currently in litigation, so it is unclear when and if it will be built. We do not include this development in the forecasts, but if it were built, we would expect about 415 high school students to live in the 1,660 homes. Middle school students living there would attend the Santa Rita District.

⁴ According to Mary Johnston, Sorrento (Monte Bella) Community Sales Manager, Standard Pacific Homes and Monica Faranda, Monte Bella Sales Manager.

⁵ At one time, the number of units was stated to be 15,000 or more.

⁶ Bill Satterlee, CreekBridge II representative, helped us immensely by providing information about development in the FGAs, although he cautions that timing, unit counts, and housing mix are still very uncertain.

⁷ According to Bob Schübert, Monterey County Planning Department.

Smaller Developments

It is expected that several smaller housing developments will be built within the planning horizon (the next 10 years). Table 2 shows these developments as well as the larger developments discussed above.

Map 2

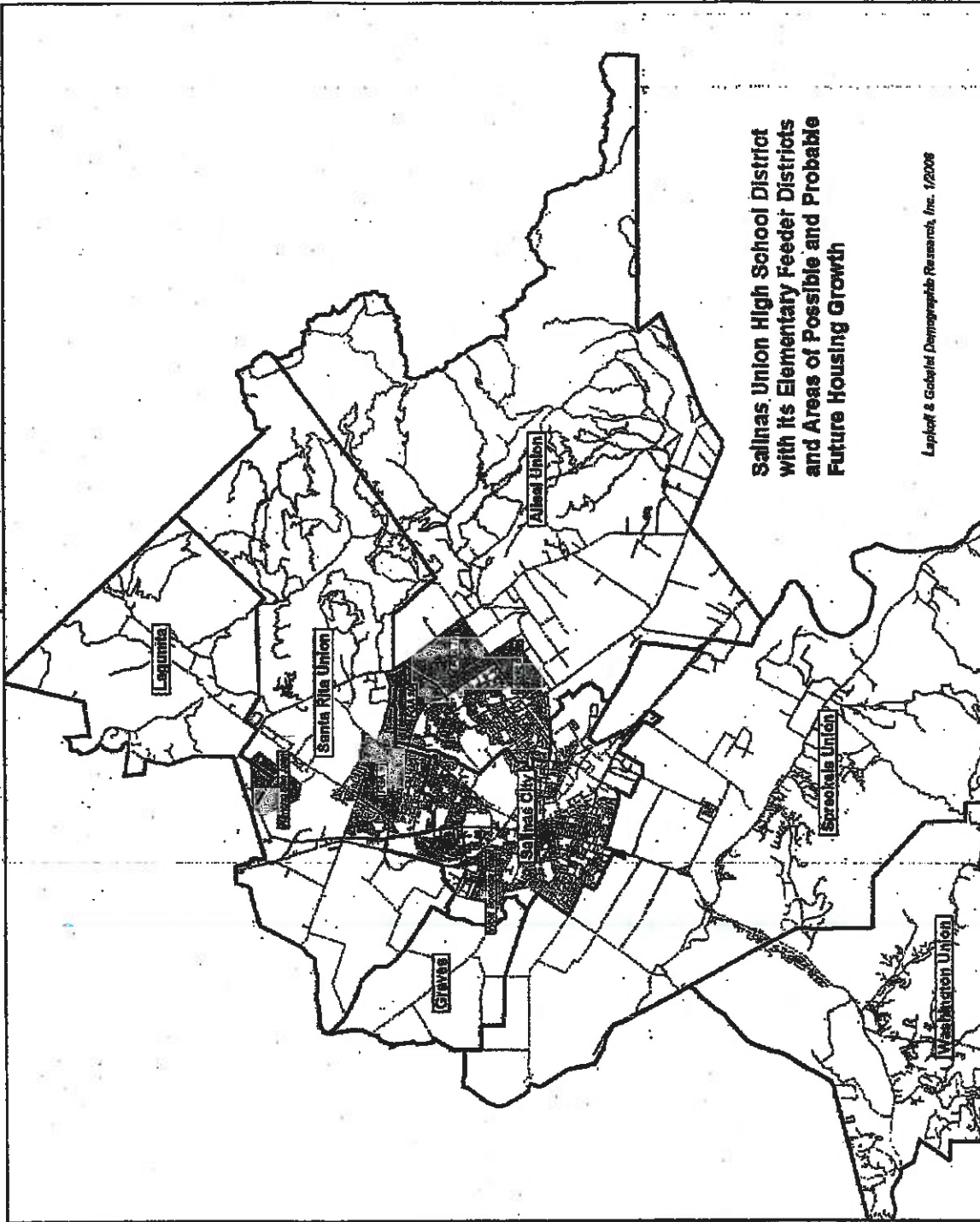


Table 2

Name of Development	Type	# Units	Feeder District	Timing	Notes
Monte Bella	SFU	853	Alisal	under construction; first occupancy 2005	380 occupied Oct 2007
Flor de Salinas	Condominiums	280	Salinas City	under construction; first occupancy 2008	108 occupied Oct 2007
Spreckels	SFU	73	Spreckels	under construction; first occupancy late 2007	0 occupied Oct 2007
Tynan Village	Apts	171	Salinas City	under construction; first occupancy late 2008	
Soledad Street	MFU	100	Salinas City		
West Boronda	mixed	600	Salinas City	first units 2010, 10 years to complete	20%+ affordable
Commons at Rogge Rd	SFU and Apts	171	Santa Rita		100% affordable
Bollenbacher & Keiton	SFU	214	Washington		
Bollenbacher & Keiton	MFU	65	Washington		
Rancho San Juan/Butterfly Village	SFU	739	Santa Rita and Lagunita	under litigation	
Rancho San Juan/Butterfly Village	MFU	408	Santa Rita and Lagunita	under litigation	
Future Growth Areas					
East (FGA 11)	mixed		Alisal	first occupancy 2010 (or later)	
Central: Creekbridge II (FGA 10)	SFU		Alisal (most) and Santa Rita (small part)	first occupancy 2010 (or later)	
Central: Creekbridge II (FGA 10)	MFU (apts) > 500 units	approx. 11,500	Alisal (most) and Santa Rita (small part)	first occupancy 2010 (or later)	
West (FGA 9)	mixed?		Santa Rita (most); Alisal and Salinas City (small parts)	first occupancy 2010 (or later)	

Forecast Methodology

The standard technique for forecasting school enrollments, called the cohort survival method, begins with the number of students in each grade and advances them one grade to estimate the following year's enrollments. As students progress to the next grade, their numbers may change if students move into or out of the community and into or out of private schools, or if some students repeat or skip grades. Typically, we measure historical "grade progressions" to determine the likely change in cohort sizes as students progress to the next grade. These historical grade progressions are then applied to forecast models to adjust our forecasts of future students.

Students from new housing inflate our measures of the District's historical grade progressions. We do not expect the past pace of housing construction to continue, so we do not want to use historical grade progressions in our forecast model. Instead, it is best to remove students from recently built housing from our historical measures. Once separated, a forecast is made for each group.

Historical grade progressions for students living in older housing reflect the migration (and other) factors that have affected the population outside the housing growth areas. With the students from housing growth eliminated, our measures of historical grade progressions are more likely to be stable.

We use a different forecast method to determine likely future numbers of students living in recently built housing areas (CreekBridge, Harden Ranch, and Williams Ranch).

Producing these enrollment forecasts for a high school district with substantial housing growth is challenging, to say the least, because we need to rely on feeder district enrollments in a cohort survival model. And because we have no elementary student address data, we cannot separate students who live in new housing from the rest of the student population. On the other hand, this separation is possible for SUHSD students because we have student address data. We have address data for SUHSD for fall 1994 through fall 2007, and have measured how neighborhood enrollments in SUHSD schools have changed over time.⁸

Unfortunately, we cannot do the same with the feeder enrollments, since address data are not available. This severely handicaps the forecaster. Without separate counts of feeder district students living in newer and older housing, we have trouble using a cohort survival method when we split the SUHSD student population into new and older housing areas. We can try to estimate the feeder populations in the older areas, but the estimation technique is not very good.

Another problem is that when students first enroll in SUHSD schools, we know where they live, but we do not know which feeder (if any) they attended. Our grade progression

⁸ We do not have Mt. Toro students in our database before 2003, so high school enrollments are slightly understated for 1994-2002.

measures may be skewed. For example, suppose that Santa Rita Union School District reduced the number of Inter-District Transfer (IDT) students it enrolled. From our perspective, the IDT students inflate Santa Rita's enrollment numbers, and when we compare SUHSD students living in Santa Rita with the enrollments in the Santa Rita School District, the elementary-to-high school grade progressions may be lower than they really should be. When the number of IDT students is substantially reduced, for example, the eighth-to-ninth grade progression measure will rise.

We suspect that Santa Rita may indeed have reduced its IDT population. This hypothesis arises from the fact that while the number SUHSD students living in Santa Rita increased substantially as Harden Ranch was constructed, elementary enrollments did not increase. How can this be? Other types of enrollments in Santa Rita must have declined, offsetting the gains from Harden Ranch. One obvious possibility is that Santa Rita reduced its IDT numbers to make room for Harden Ranch students.

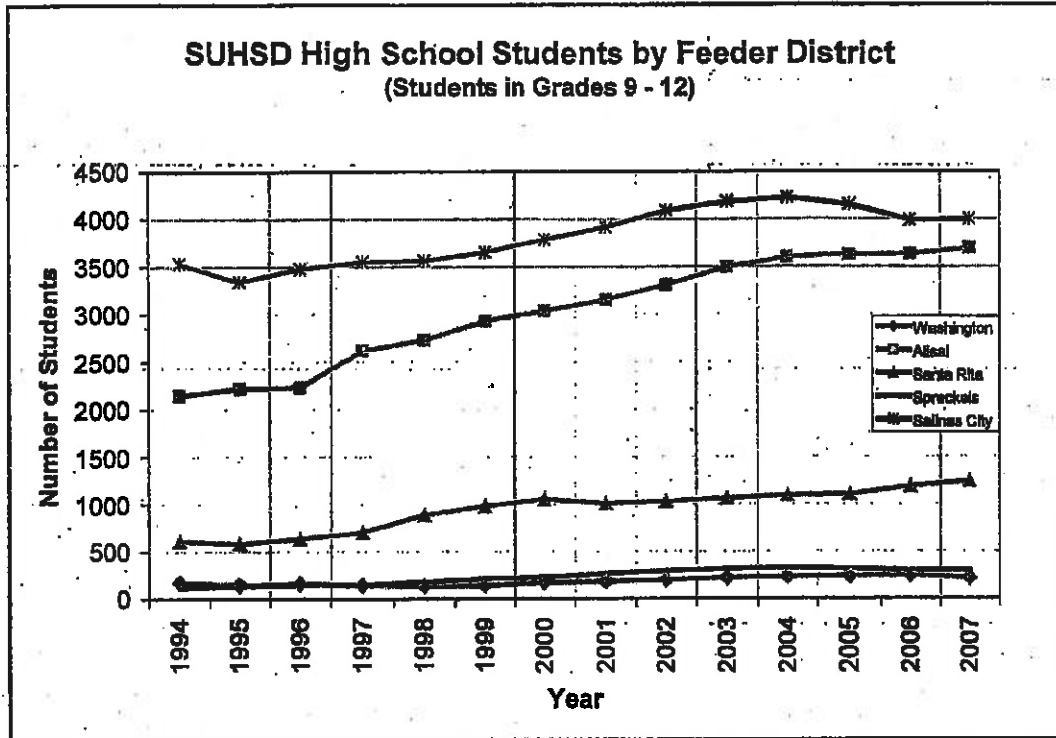
Salinas City School District might also have had changing IDT totals. As its own resident student population shrank, the District has encouraged more IDT students to attend its schools. It is possible, for example, that larger numbers of Alisal students have enrolled in Salinas City elementary schools. All of this makes our middle and high school enrollment forecasts less certain, because we cannot make the appropriate comparison of elementary and high school residents of elementary feeders.

Historical Analyses and Forecasts by Feeder District

SUHSD has seven elementary feeder districts: Salinas City, Alisal, Santa Rita, Washington, Spreckels, Lagunita, and Graves. Lagunita and Graves are so small that we do not discuss them in the text, but their residents are included in the forecast of SUHSD students. Chart 5 shows SUHSD students living in each of the five larger feeder districts. The Salinas City area contains the largest number of SUHSD students, but the Alisal area is a close second. The Santa Rita area contains a much smaller share of SUHSD students, followed by even smaller shares in Spreckels and Washington.

In the rest of this section we provide analyses and forecasts for each of the five largest feeder districts.

Chart 5



Salinas City School District

Chart 6 shows overall enrollments by school level for Salinas City School District (SCSD) students as well as SUHSD middle and high school students living in the this feeder. Elementary enrollments were fairly stable for a decade, but between 2003 and 2005, numbers fell sharply and remained at the lower level through 2007. Middle school enrollments show a pattern similar to the elementary, with the exception that there was some enrollment growth between 1994 and 2004. High school enrollments resemble the middle school pattern, except lagged a year or two. Enrollments fell modestly between 2004 and 2006, with 2007 enrollments very similar to 2006 figures.

The enrollment pattern in SCSD is somewhat unusual. Elementary enrollment trends are usually replicated a few years later by middle- and then high school enrollment trends. This is not the case with Salinas City elementary/middle/high school students, which experienced the same pattern at about the same time. The simultaneity suggests a "period effect," which is an effect that occurs during a particular time period and affects all age groups at the same time. Substantial changes in the economy or housing market could create a pattern like this.

Chart 6

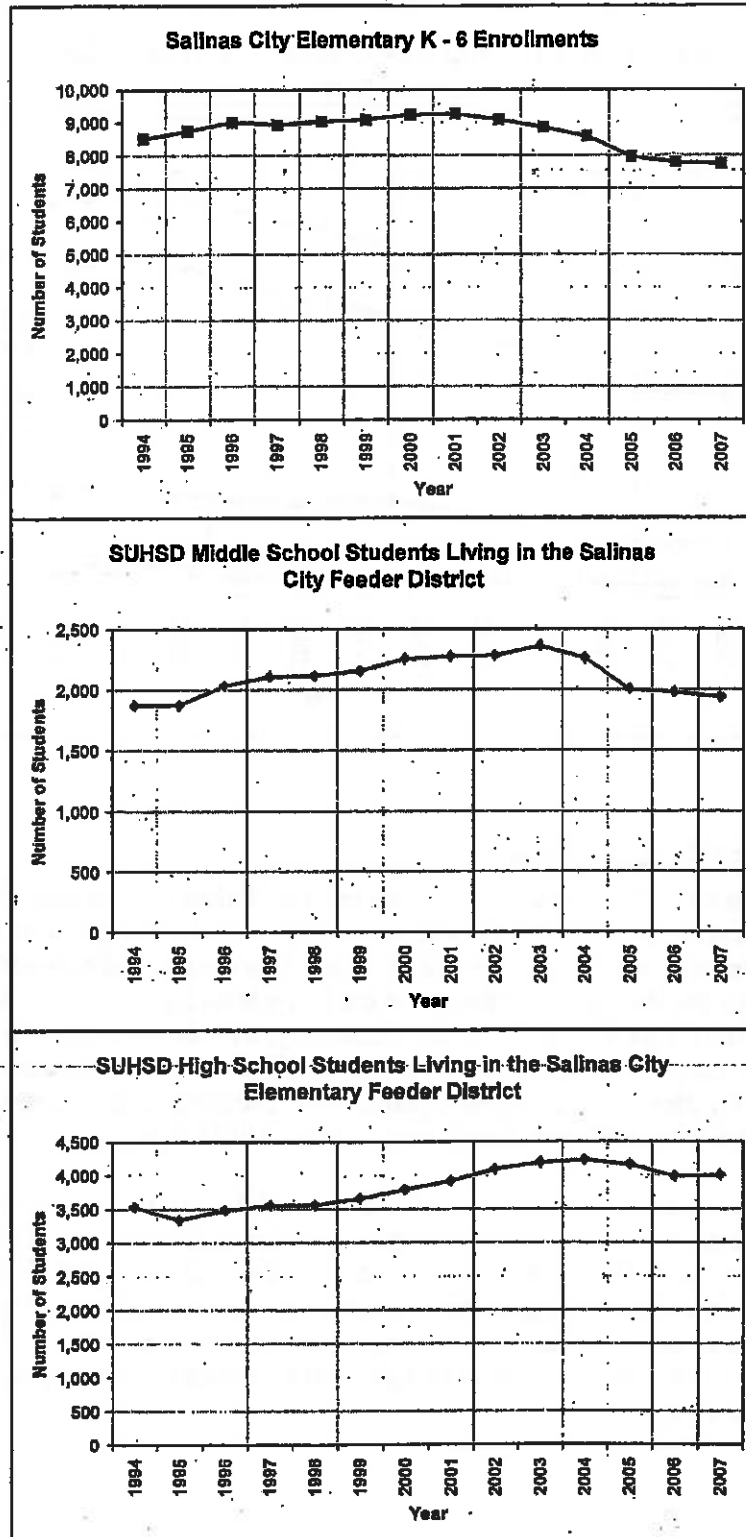


Chart 7 shows the number of SUHSD high school students living within the portions of major developments that are in Salinas City District. Only a small area of Harden Ranch is in Salinas City, and enrollments from the new housing were stable. Virtually the entire high school enrollment increase between 1995 and 2004 was *not* a result of new housing. Instead, the enrollment increase could have resulted from families moving into the older housing in the elementary district or from more families than in the past choosing public, rather than private, schools.

Chart 7

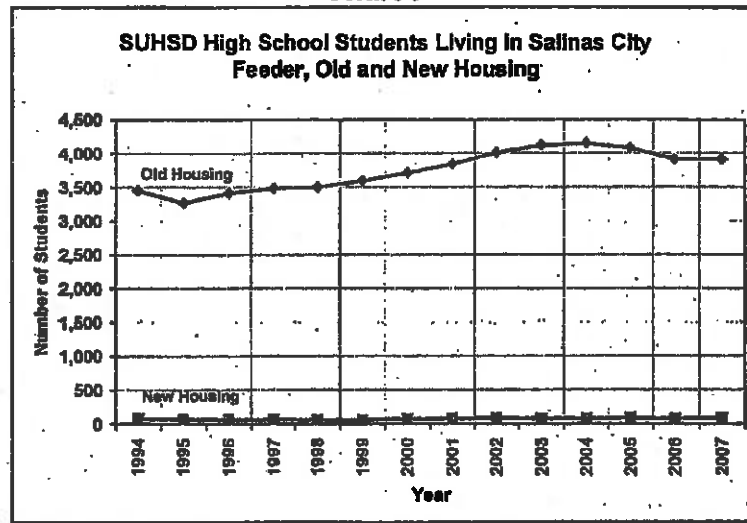


Chart 8 shows SCSD kindergarten enrollments, which peaked in 2000 and then declined. This large cohort is now in the seventh grade. Progressively smaller cohorts will follow, eventually reducing SUHSD enrollments from this area.

Chart 8

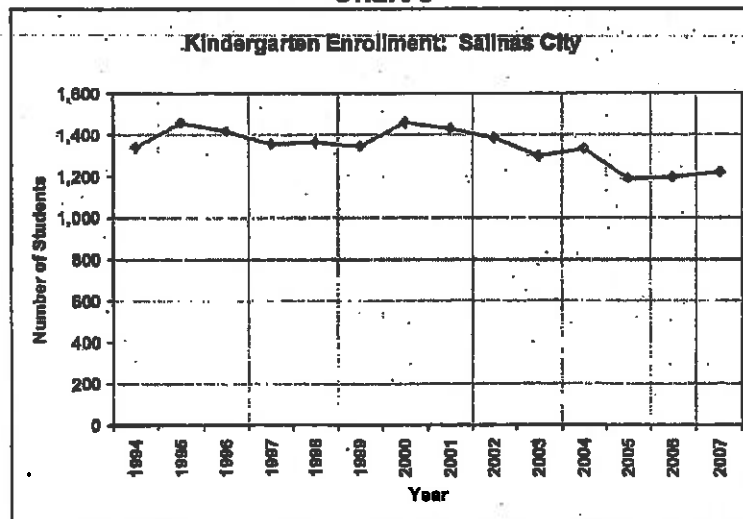


Chart 9 shows the aggregated grade progressions for Salinas City School District. The number of kindergartners through fifth graders is compared with first through sixth graders the following year. This is a measure of the change in cohort size as students progressed to the next grade. These grade progressions are usually most affected by migration into or out of the District, and by transfers between public and private schools. This graph shows that Salinas City Elementary lost many students between fall 2004 and fall 2005, and to a lesser extent the year before and after. More than eight percent of the students that were attending SCSD in fall 2004 left SCSD by fall 2005. Note that the most recent year's grade progressions resemble the historical norm.

Chart 9

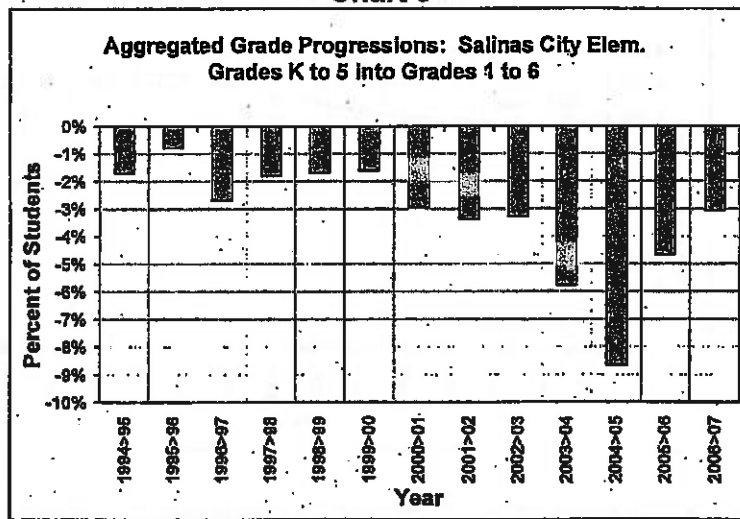
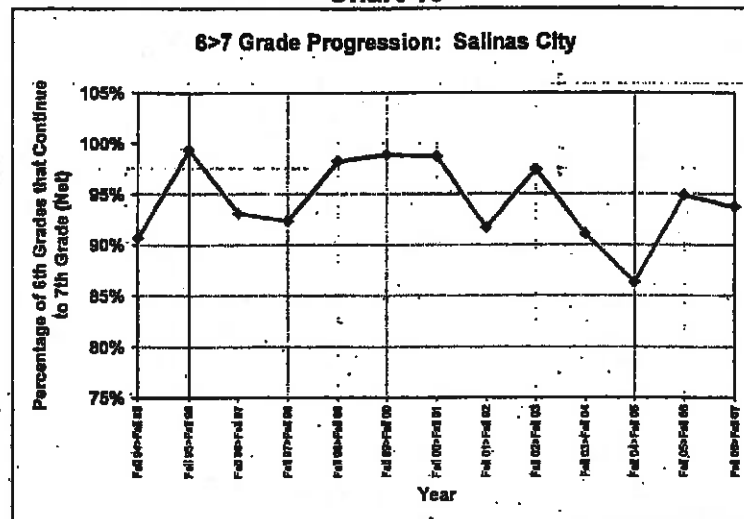


Chart 10 shows the sixth to seventh grade progression over time. This grade progression measure compares Salinas City's sixth grade class with the number of SUHSD seventh graders living in the Salinas City area the following year. In all but one year, the ratio was between 90 and 100 percent. An important assumption in the forecast model concerns what this ratio will be in the future. The fact that it has been relatively stable gives greater certainty to the forecast for SUHSD students living in SCSD.

Chart 10



Forecast of SUHSD Students Living in SCSD

Because there has been relatively little housing growth in the Salinas City district, we can make a forecast ignoring the effect of past housing growth on the grade progressions, using a typical cohort survival model. Moreover, the fact that there was some housing growth in the past means that the grade progressions were slightly higher than they otherwise would have been. Since a similar amount of housing growth is anticipated in this elementary district, the historical grade progressions are appropriate to use in our forecast model; they implicitly assume that some small amount of housing growth will continue. However, we still explicitly account for development in Tynan Village Apartments, since a relatively large number of students are likely to live in this future development.⁹ The West Boronda development would also generate students, but we account for them elsewhere.

A major assumption for the forecast model concerns the set of grade progressions. We believe that the very low grade progressions between 2003 and 2005 are unlikely to recur. Instead, for the Medium forecast, we use the most recent set of grade progressions, which is similar to the historical norm.

Table 3 shows our forecast of SUHSD students living in the Salinas City area. In the absence of the West Boronda development (shown later), middle school enrollments would decline by about 100 students between 2007 and 2012, while high school enrollments would decline by about 300 students.

⁹ We model 11 students per grade when Tynan Village is fully occupied. This development includes 171 apartments, of which 40 percent are affordable.

Table 3

Component Forecast for SUHSD Students Living in Salinas City Elementary Feeder										
Students Living Outside Major New Housing Developments										
GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7	969	958	956	940	899	817	959	981	981	981
8	929	932	921	919	903	862	880	922	944	944
9	1,023	981	984	973	971	955	914	932	974	996
10	954	972	930	933	922	920	904	863	881	823
11	1,022	902	920	878	881	870	868	852	811	829
12	910	957	847	865	823	826	815	813	797	756
7-8 Total	1,898	1,890	1,877	1859	1802	1779	1839	1903		
9-12 Total	3,909	3,822	3,681	3649	3597	3571	3501	3460	3463	3504
Students from New Housing: Harden Ranch										
GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7	19	21	21	21	21	21	21	21	21	21
8	21	21	21	21	21	21	21	21	21	21
9	24	21	21	21	21	21	21	21	21	21
10	22	22	22	22	22	22	22	22	22	22
11	24	21	21	21	21	21	21	21	21	21
12	18	18	18	18	18	18	18	18	18	18
7-8 Total	40	42	42	42	42	42	42	42	42	42
9-12 Total	88	82	82	82	82	82	82	82	82	82
Students from Future Housing: Tynan Village apartments										
GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7		5	11	11	11	11	11	11	11	11
8		5	11	11	11	11	11	11	11	11
9		5	11	11	11	11	11	11	11	11
10		5	11	11	11	11	11	11	11	11
11		5	11	11	11	11	11	11	11	11
12		5	11	11	11	11	11	11	11	11
7-8 Total	0	10	22	22	22	22	22	22	22	22
9-12 Total	0	20	44	44	44	44	44	44	44	44
Sum										
GRADE	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
7	988	984	988	972	931	949	991	1,013	1,013	1,013
8	950	958	953	951	935	894	912	954	976	976
9	1,047	1,007	1,016	1,005	1,003	987	946	964	1,006	1,028
10	976	999	963	966	955	953	937	896	914	956
11	1,046	928	952	910	913	902	900	884	843	861
12	928	990	876	894	852	855	844	842	826	785
7-8 Total	1,938	1,942	1,941	1923	1866	1843	1903	1967	1989	1989
9-12 Total	3,997	3,924	3,807	3775	3723	3697	3627	3586	3589	3630

Alisal Union School District

Chart 11 shows overall enrollments by school level for Alisal Union School District. Elementary enrollments grew from 1994 (and earlier) through 2000. After 2003, enrollments declined very slightly and remained stable after 2005. This pattern after 2003 was very similar to that experienced in SCSD, but the decline was not as great because of the construction of Monte Bella housing. Middle school enrollment patterns resemble the elementary level, but with a higher growth rate than the elementary between 1994 and 2000. There was less of an enrollment decline in the middle schools after 2003 than in the elementary grades. SUHSD high school enrollments from the Alisal area also increased after 2004, and have not yet begun to decline. As might be expected, high school enrollment trends have lagged a few years behind the middle school enrollment trends.

Charts 12 and 13 show the numbers of SUHSD middle and high school students living in the new housing of major developments located in the Alisal school district (CreekBridge, Williams Ranch, and Monte Bella) and in older housing. Once we removed students living in the large developments, we found that middle school enrollments declined slightly while high school enrollments have been stable in this area. Virtually all SUHSD enrollment growth in the Alisal area is from students living in the new developments. The fact that enrollments outside the large development areas are fairly stable is an excellent illustration of why we separate students from new housing when we do forecasts. In this case, the increasing numbers of students from new housing disguised what was going on in the older housing in this part of the District.

Also, we see that enrollments from new housing have stabilized in the middle schools but continue to increase in the high schools. This difference suggests a slight "aging" effect in the new housing: it is likely that a somewhat high proportion of families buying the new housing had young children. As the housing ages, high school enrollments increase when the young students reach the higher grades.

Chart 11

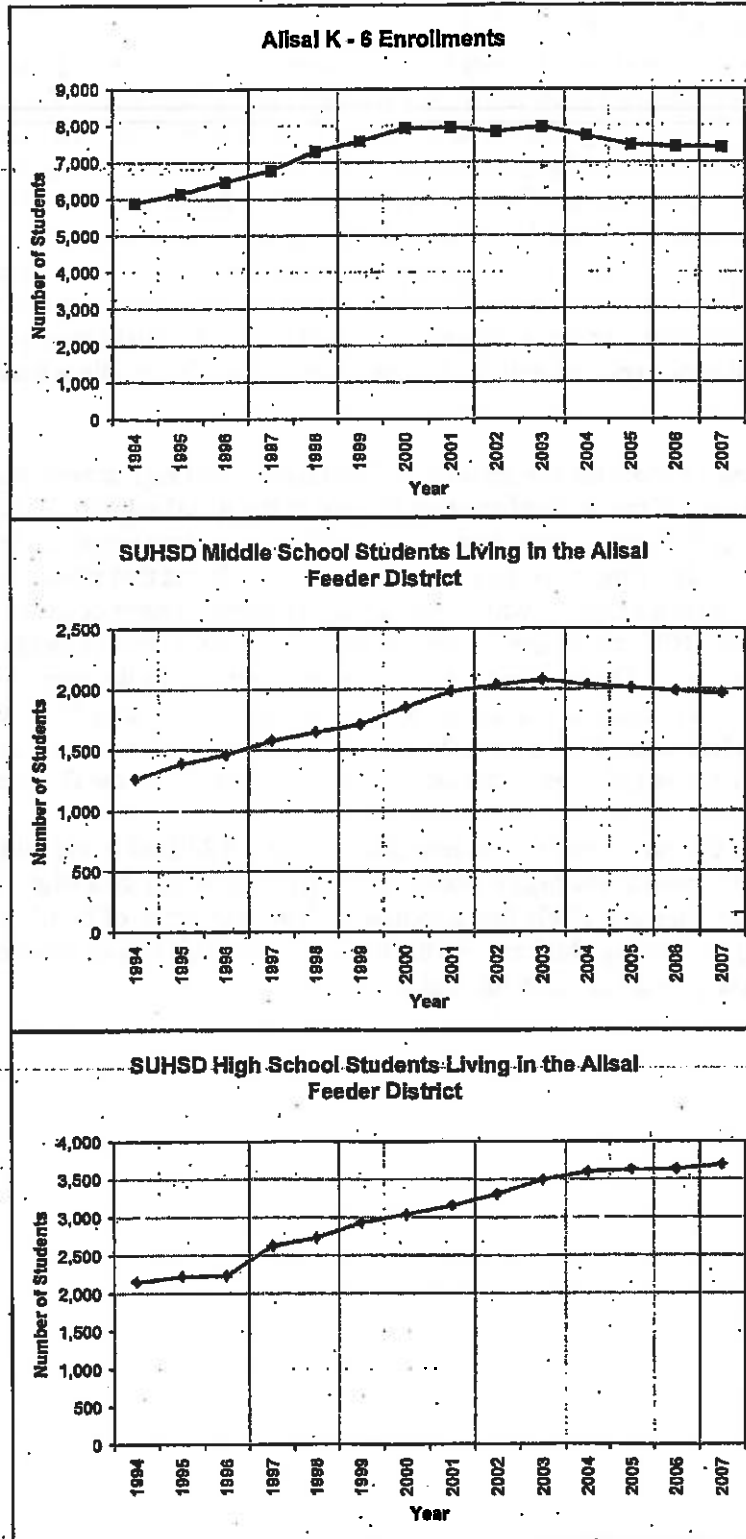


Chart 12

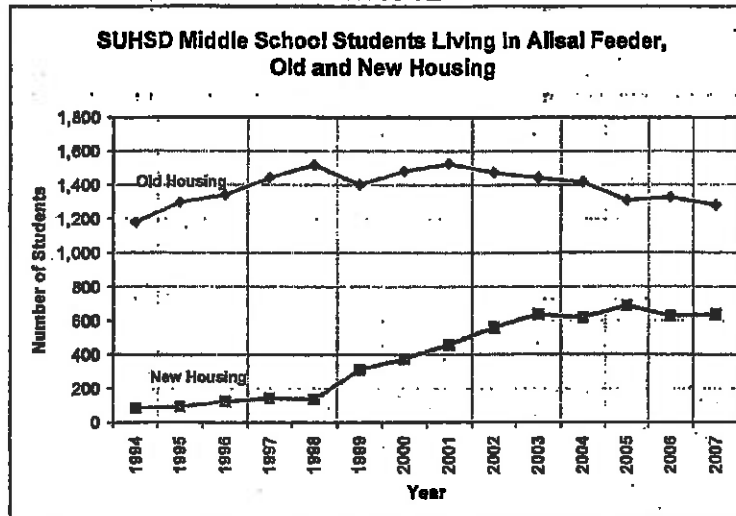


Chart 13

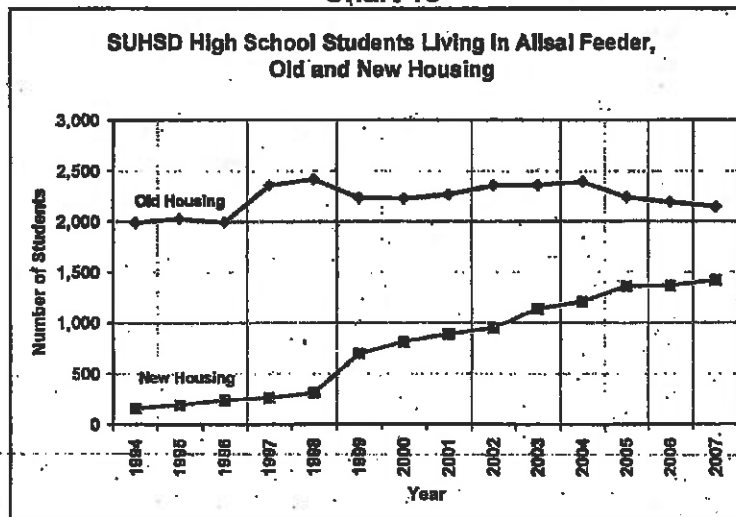


Chart 14 shows Alisal's kindergarten enrollments, which have been fairly stable. However, kindergarten enrollments have been higher than the historical norm for the last two years, which will eventually increase the number of SUHSD students from the Alisal area.

Chart 14

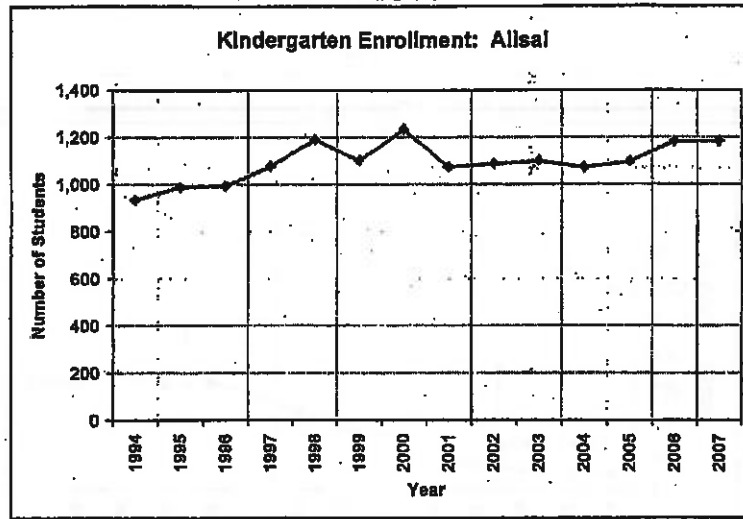


Chart 15 shows the aggregated grade progressions for Alisal Union School District. Students in kindergarten through fifth grades are compared with the number of first through sixth graders the following year. The ratios measure the change in cohort size as students progressed to the next grade. The grade progressions are usually most affected by migration into and out of the district, and by transfers between public and private schools. These data include the enrollment effects of new housing: the grade progressions are inflated by the students from new housing and should not be used to forecast future enrollments. Interestingly, despite some modest housing growth (mainly from Monte Bella), recent grade progressions are negative, meaning that more students have left the elementary district than moved in.

Chart 15

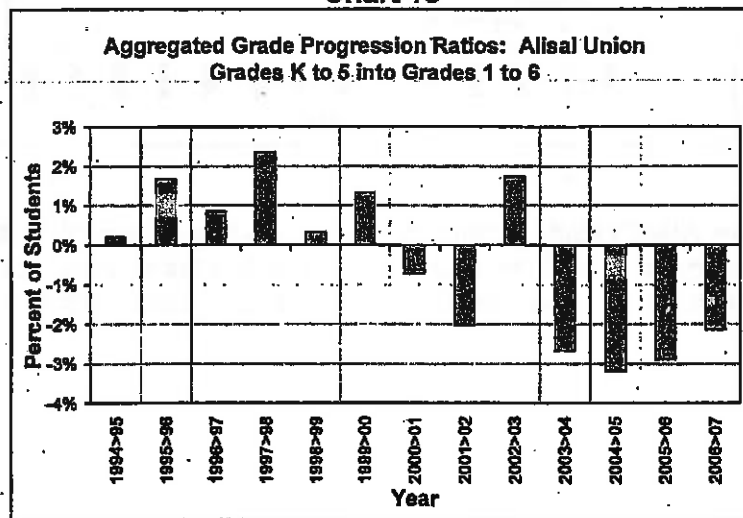
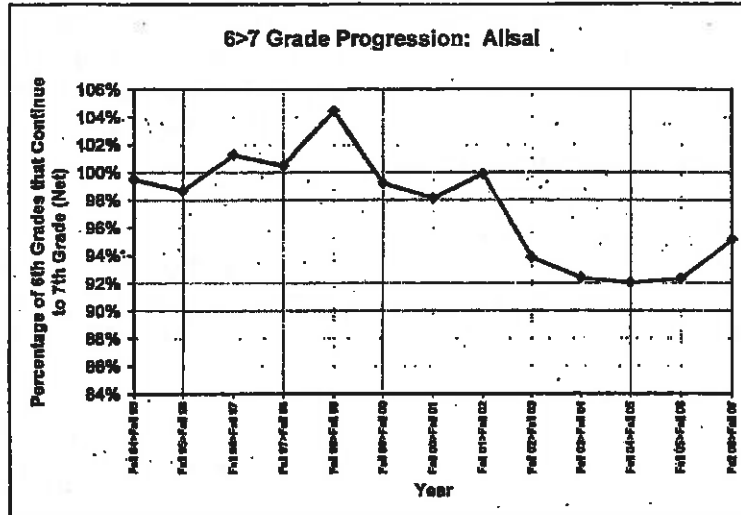


Chart 16 shows the sixth to seventh grade progression over time. This progression compares Alisal's sixth grade class one year with the number of seventh grade SUHSD residents of the Alisal area the following year. Once approximating 100 percent, the rate has been between 92 and 95 percent for a number of years. Perhaps the higher progression for the most recent pair of years results from students moving into Monte Bella homes.

Chart 16



Components of Forecast of SUHSD Students Living in AUSD

Because of the large amount of past and current housing growth in Alisal, the forecast is quite complicated. We forecasted four different groups of students in this part of the high school district:

1. Students living in the existing large developments (CreekBridge and Williams Ranch).
2. Students living in developments under construction (Monte Bella),
3. Students anticipated from future housing developments, and
4. Students in the rest of the student body.

Forecast of Students Living in CreekBridge and Williams Ranch Homes

CreekBridge I and Williams Ranch were completed around 2004. To forecast students from these developments, we used a cohort survival method, but needed some way of estimating the size of the seventh grade class. The forecast keeps the number of seventh graders from these areas at their current level of 327 students. We then forecast subsequent grades by aging (advancing students one grade for each forecast year) the seventh grade class and applying the current year's grade progressions.

Forecast of Students Living in Developments Under Construction

To forecast students from Monte Bella, we assumed that current enrollments from the area reflect 45 percent of eventual enrollments, as 45 percent of the development has been occupied. We assume the development will be completed by 2013.¹⁰

An implicit assumption made by the forecast model is that the number and age distribution of students living in Monte Bella will not change over time. Sometimes there is an aging effect in new developments, such that high school enrollments would first increase and then decrease over the neighborhood's first 10 to 20 years. We chose not to assume this aging effect after reviewing enrollments by age of housing in many of Salinas' subdivisions. While some areas showed enrollment increases over time as they aged, many areas did not experience such increases. This assumption should be monitored once the development is completed.

Forecast of Students Outside Major Housing Developments

To forecast middle and high school students in the older parts of the Alisal district (outside of CreekBridge, Williams Ranch, and Monte Bella), we used a cohort survival method but needed some way to estimate the size of the seventh grade class.

Forecasting the seventh grade class was challenging. We used current Alisal cohort sizes to do this.¹¹ The seventh grade class first shrinks for several years, and then increases. This follows the general pattern of Alisal's recent kindergarten enrollments.

Total Forecast of SUHSD Students Living in Alisal District

Table 4 shows the enrollment forecast for each housing group and the combined total forecast. Overall, SUSHD enrollments increase a bit. Middle and high school enrollments each increase by about 100 students over the 10-year period. Most of the increase is from Monte Bella. There is a slight increase in the number of students living in CreekBridge and Williams Ranch. Meanwhile, the number of students living in the area's older housing continues to be fairly stable.

¹⁰ This timing is assumed because the development is in its third year of occupancy and the housing market has slowed.

¹¹ Specifically, we applied the most recent set of Alisal grade progressions to Alisal's current students by grade and adjusted for the estimated effect of Monte Bella on the current grade progressions. This gave a forecast of students, by grade, in Alisal. We applied the forecasted percentage change in the sixth grade class and to the SUHSD seventh grade class. Implicit in this estimate is that students in the large developments are evenly distributed through the grades. Ideally, we would use student address data from the feeder district and count the number of students from outside the new developments explicitly, providing the basis for a straightforward cohort-survival forecast.