

# Attachment H

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February 4, 2025

Craig Spencer, Director of Housing and Community Development  
Monterey County Housing and Community Development (HCD)  
1441 Schilling Place, South 2nd Floor  
Salinas, CA 93901  
[spencerc@CountyofMonterey.gov](mailto:spencerc@CountyofMonterey.gov)

**Subject: Developer Letter of Intent re: Olmsted Road Residential Development – Monterey County**

Dear Mr. Spencer,

I write this letter to convey my intent to develop the site located at 1101 Olmsted Road, Monterey, CA 93940, in Monterey County, and to provide information in support of the site's inclusion in the County's sixth cycle housing element. The property is currently slated for the development of 80 market rate units and 20 affordable units under an SB 330 Builder's Remedy application. Because of the site's proximity to high resource areas, specifically the cities of Monterey, Seaside, and Del Rey Oaks, it is my goal, contingent on the site's inclusion in the housing element, to pursue a higher density development as outlined below.

The higher density proposed development would occur on 43 acres of the total 120-acre Tarpy Flats property. It would occupy a portion of two of the five existing parcels that make up the entire site, as shown in the attached exhibit. The larger parcel, APN:259-011-072, located on the Eastern side of Olmsted Road would consist of approximately 30 acres of development, while APN:259-011-064, on the Western side, would comprise approximately 13 acres.

With a projected loss of 8 acres to community infrastructure (streets, pocket parks, etc.), I am proposing the net development of 35 acres of housing, with up to 375 townhomes located on the Eastern portion of the property, on a net site of 25 acres, at a density of 15 units per acre. An additional 350 units of three-story multi-family housing would be located on the Western parcel, on 10 acres, with a density of up to 35 dwelling units per acre. Additionally, 145 of the units in the multi-family area, or 20% of the total units overall, would constitute affordable housing. The remaining units, by virtue of their design as townhomes and apartments, would provide a much needed, more affordable alternative to single-family homes.

Should the County reinsert this high resource property back into the Housing Element Sites Inventory and complete the required rezoning action to accommodate the proposed densities, I am confident that I can develop a financially feasible and viable project. This is based on the assumption that the County will also work with me to secure the necessary water to construct the project.

Our community needs a greater offering of housing options that meet the needs of varying incomes and lifestyles, i.e. we need much more than just market rate, single family homes. The proposed higher density project will go a long way in meeting this need.

Thank you for your consideration of this additional site and my interest in developing it. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Brad Slama

**From:** [Spencer, Craig](#)  
**To:** [Guthrie, Jaime S.](#); [Beretti, Melanie](#)  
**Subject:** FW: Further comments and resources on site capacities in draft Housing Element  
**Date:** Friday, January 3, 2025 2:24:35 PM  
**Attachments:** [marin.co.stvincentsschoolforboys.440 low income units.pdf](#)  
[Watsonville.Regional 100% affordable projects.pdf](#)  
[sites\\_inventory\\_memo\\_final06102020.pdf](#)  
[Stanislaus County Non-Vacant Sites.pdf](#)  
[Santa Clara City 4701 Patrick Henry Drive 9 acre Commercial.pdf](#)  
[Santa Clara City Redevelopment Trends Chart.pdf](#)  
[Sonoma City Program.Adaptive Reuse \(nonvacant commerical\).pdf](#)  
[NapaCounty.Discussion on developing portion of large site.pdf](#)

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This is a helpful letter from LandWatch.  
I suggest we share with the Harris team.

Craig Spencer  
County of Monterey  
Housing & Community Development  
(831) 755-5233

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**From:** Kristina M <kristimarkey@gmail.com>  
**Sent:** Friday, January 3, 2025 11:47 AM  
**To:** Spencer, Craig <SpencerC@countyofmonterey.gov>  
**Subject:** Fwd: Further comments and resources on site capacities in draft Housing Element

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

Hi Craig,

Based on our last email exchange regarding HCD's request for more evidence to support unit counts on sites over 10 acres, I looked at pertinent sections of the Housing Elements for the Counties of Sonoma, Santa Clara, Stanislaus, San Joaquin, Solano, Contra Costa, Napa and Merced, as well the Cities of Salinas, Watsonville, Sonoma, Santa Rosa, and Santa Clara. The following is a summary of what I found, with some attached pages from various elements.

About half of the jurisdictions included sites over 10 acres in their Housing Elements, but the vast majority of those housing units were predicted to be moderate/market rate housing. A few projects had a small percentage of affordable housing, none over 20%. In their list of pipeline projects, I did not see examples of large sites with the kinds of percentage of affordable units represented in the County Housing Element, with one exception which may be useful to the County. In Marin County, St. Vincent's School for Boys is planning to build 440 low-income units on 3 parcels totaling 315 acres; this site was successfully included in Marin County's Housing Element without specific form of proof other than a few sentences describing what is planned. (See attached excerpt from Marin County's HE) There may be additional jurisdictions that successfully included large-lot developments

by religious institutions and schools in their Housing Element and HCD did not require anything other than a statement of intent. I would add that the HCD guidelines do not specify what is required, other than "developer interest". The County's consultants may be able to track down additional examples to bring to HCD's attention in defending the County's large-lot developments per SB 4.

As for large sites that are not planned for development by an institution or agency, such as Sites 1 and 40, it does not seem viable for the County to defend projections of 53% affordable units. It does not seem likely that 242 units of VL/L on Site 1 or the 227 units on Site 40 would be developed, given that affordable housing projects in the region are in the range of 50-132 units. I have attached a chart from the City of Watsonville's HE listing affordable projects in the tri-county region. This list suggests that HCD is correct in questioning units counts in excess of this range, unless such a project is being undertaken and financed by an institution. Additionally, Site 1 is non-vacant, containing existing agricultural operations; only 45 of the 95 acres would be developed; as a non-vacant site, additional findings must be made, complicating the inclusion of this Site in the Housing Element. LandWatch continues to advocate for removal of Sites 1 and 40. (It is worth noting here that site 1, as well as sites 2 and 52, are identified as "prime farmland" on the Department of Conservation's agricultural lands map, and LandWatch will continue to raise that issue as well in requesting their removal from the Housing Element.)

The County's draft Housing Element also analyzed a number of sites as "large lots" where the actual developable area is less than 10 acres. Page 17 of the HCD guidebook states that if the defined area for development is less than 10 acres, the large-lot analysis is not required. (See page 17 attached) I also attached sample language from Napa County's Housing Element distinguishing large lots where the development is less than 10 acres.

HCD also requested more evidence from the County to support projected development of non-vacant lots smaller than 10 acres. The County may need to look regionally for examples of such projects. I attached examples from Stanislaus County, City of Santa Clara and the City of Sonoma. While not in our region, it may provide some ideas of what kinds of projects to cite as examples. And, in the event no other examples can be found, these could prove useful.

Aside from the issue of large/non-vacant sites, we encourage the County to add a program/policy to create a range of allowed densities, eg. 20-30 units per acre, to address HCD's comment that the density of 20 units without a range is too limiting. Several Supervisors also suggested this during the public hearing on the draft Housing Element.

Finally, LandWatch encourages the County to add to the Housing Element a site in Tarpy Flats that has a Builder's Remedy application - 1101 Olmstead Road.

Thank you for the opportunity to provide this input on behalf of LandWatch. Please feel free to call me if you have questions or wish to discuss our research. I hope you had a restful holiday week.

Kristi Markey, Consultant  
LandWatch

831.869.9202



Chris Steinbruner  
928 E. Blanco Rd, Ste 200  
Salinas, CA 93901  
831-277-5808  
[chris@steinhill.com](mailto:chris@steinhill.com)

November 1, 2024

Ms. Jamie S. Guthrie  
Senior Planner  
County of Monterey  
Salinas, CA 93901

Via Email: [GuthrieJS@Countyofmonterey.gov](mailto:GuthrieJS@Countyofmonterey.gov)

Dear Ms. Guthrie:

My family and I own the property located on Russell Road, north of Salinas (Site #1, 2023-2031 Housing Element 6<sup>th</sup> Cycle, Monterey County,) commonly known as the Ferrasci Ranch.

We understand that Monterey County has a lack of housing, and our property is included in RHNA housing numbers supplied to the State of California.

In that regard, we are interested in moving forward with entitlements and development on this parcel (APN 113-161-018-000.) We hope to begin this process immediately.

The attached map (page 7-72), attached herewith, states: "An estimated 45.45 acres on this 95.31 acre site (highlighted in red in the aerial image above) could be developed with housing." I understand that this statement is actually intended to indicate that the entire 95.31 acre site would be developed with an estimated density of 10 units per acre, yielding the same estimated numbers as a density of 20 units per acre on 45.45 acres.

Developing only 45 acres of this site would be unfeasible for both housing development and for existing agricultural operations. In this case, we would likely not pursue development.

Thank you for your return phone call recently. However, I respectfully request that you also respond to us in writing with the county's intentions in regard to development of our property. This will be helpful with our planning and will assist us in moving forward as quickly as possible.

Yours truly,



Chris Steinbruner

Attachment

CC: Craig Spencer (spencerc@CountyofMonterey.gov)  
Supervisor Luis Alejo (District1@countyofmonterey.gov)



# 2023–2031 Housing Element

## Chapter 7: Adequate Sites Inventory Analysis and Methodology

### Site 1: Russell Rd Farmland



<b>APN:</b>	113-161-018-000	<b>Site Description and Factors Supporting Development:</b>  Site 1 is located in the Bolsa Knolls neighborhood just north of the City of Salinas. This site has significant <u>property owner/developer interest</u> in developing housing. While the site has no improvement value, the County has identified the site as being used for row crops and is <b>not considered vacant</b> in the Housing Element Site Inventory Guidebook.  Given its proximity to existing development and the City of Salinas' city limit and Sphere of Influence, the County believes that the underutilized portion of the site could be developed with housing.  An estimated 45.45 acres on this 95.31 acre site (highlighted in red in the aerial image above) could be developed with housing. Housing projections for this site include <b>455 total units</b> , consisting of <b>146 very low-</b> , <b>96 low-</b> , and <b>59 moderate-</b> income units. The site will be rezoned as HDR/20 and the future subdivision of the site is assumed.
<b>Site Acreage:</b>	95.31	
<b>Developable Acres:</b>	45.45	
<b>Existing Zoning:</b>	F/40	
<b>Planned Rezone:</b>	HDR/20	
<b>Net Unit Potential:</b>	455	
<b>Affordable Units:</b>	146 VL, 96 L, 59 M	
<b>Proposed Density:</b>	20 du/ac	
<b>I:LV</b>	0.00	

# City of Marina



City of Marina  
211 HILLCREST AVENUE  
MARINA, CA 93933  
831- 884-1278; FAX 831- 384-9148  
www.cityofmarina.org

December 18, 2024

Chairperson, Board of Supervisors  
County of Monterey  
168 West Alisal St., 1st Floor  
Salinas CA 93901

Subject: County of Monterey Draft Sixth Cycle Housing Element

Dear Chairperson:

Thank you for providing the City of Marina with an opportunity to comment on the County's Sixth Cycle Housing Element. Having just received certification for the City's Housing Element, I know you are managing a complex long range planning document with competing stakeholders and interested parties. This letter is a follow up to our comment letter sent to the County on June 6, 2024.

## 1. Over Planning/Request to Remove Site #7

The County of Monterey's Regional Housing Needs Allocation is 3,326. In addition to the County RHNA obligation and pursuant to Senate Bill 166, the California Department of Housing and Community Development (State HCD) recommends an additional buffer that will provide the County with the capacity to address potential net loss issues over the planning period of 2023-2031. HCD recommends that each jurisdiction identify additional candidate sites to accommodate a RHNA buffer of 15 to 30 percent. Even if the County was being extremely conservative in its No Net Loss provisions, the County should only be accounting for 4,323 units not the 6,362 units listed in your draft document<sup>1</sup>. This represents a 47% increase over the necessary RHNA allotment. The City requests that you remove Site #7 from your Housing Element Site Inventory for the following reasons, which are further detailed below:

- Impact to economic development;
- Airport incompatibility;
- Availability of alternative sites/removal of viable sites; and
- Failing to implement environmental justice initiatives.

In addition to the above, as more detailed below, removal of Site #7 from the Housing Element Site Inventory will not negatively impact the No Net Loss provisions of state law.

## 2. Economic Development

Site #7 abuts the Marina Airport and development of housing near the Airport has the potential to impact the City's economic development efforts. As we have explained, the Marina Airport is the linchpin of the City's economic development efforts. This was envisioned back in the 2000 General Plan and continues

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<sup>1</sup> See Table ES-1 (County of Monterey Draft Housing Element)

to be a major focus of the City Council moving forward.<sup>2</sup> These efforts recently were demonstrated by Joby Aviation receiving a \$9.8-million-dollar CALCOMPETES grant which will assist Joby Aviation in completing construction of a 220,000 square foot building. This new building will increase aircraft production from four (4) to fifty (50) aircraft per year. Placing high-density low-income housing directly abutting the Marina Airport could severely limit the economic development potential of this facility for decades to come.

### 3. Safety

According to the Marina Airport Compatibility Plan, Site #7 is directly abutting the airport runway protection zone. Placing low-income affordable housing directly abutting this zone will create safety incompatibility that makes it infeasible for future residential development.



If the County persists with including Site #7 in its Site Inventory, the City of Marina would like to propose entering into a Memorandum of Understanding (MOU) with the County to discuss the long-

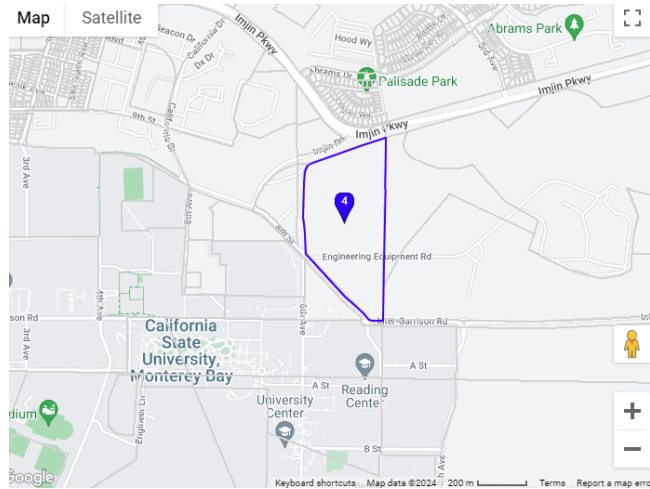
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<sup>2</sup> General Plan Policy 2.4.14- The City shall encourage economic opportunities and development at and surrounding the Marina Municipal Airport, by providing opportunities for aviation and non-aviation related uses that have the appropriate sites and environment for a broad range of commercial and industrial uses. The City shall create an attractive image for the entire Airport area, both as experienced upon entering and traveling within the area that promotes the City’s economic objectives to contribute to an overall appearance that will attract desired uses and enhance the area’s short and long-term economic viability. (2008- 224)

<sup>2</sup> [NOTE: There are 2 footnotes number “2”] General Plan Policy 2.4.15-The City shall protect the Marina Municipal Airport and related aviation facilities from encroachment by potentially incompatible land uses and shall promote the development of an Airport facility that can accommodate the future growth of aviation and air commerce while minimizing airport-related environmental and safety hazards. The City shall utilize the Airport Influence Area (AIA), or “Airport Planning Area” adopted by the Monterey County Airport Land Use Commission in the Marina Municipal Airport Comprehensive Land Use Plan, and consider all applicable FAA regulations, policies and procedures.

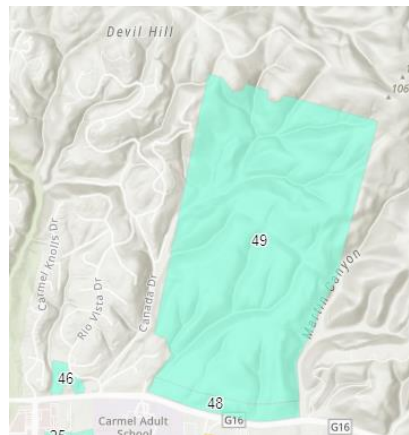
term development of the property and potential annexation of the site so Marina residents will have a voice in the development of the property.

**4. Alternative Site-**for the aforementioned reasons, the City of Marina urges the County to identify a less impactful and more sensible development site or sites to meet the County’s housing obligation. One potential site is the parcel owned by the UC Regents that is close to the CSUMB campus (APN 031-101-018)<sup>3</sup>. If the County were to operate this parcel in conjunction with the UC Regents as a housing opportunity site within the City of Marina’s limits, the County could use it to meet its RHNA allocation despite any local zoning standards that could otherwise obstruct or limit the development of affordable housing.<sup>4</sup> The parcel is 46 acres and according to the County’s Housing Element can accommodate up to 476 units.<sup>5</sup>



**5. Removal of Carmel Site-Does Not Affirm Fair Housing.**

A key mandate for the Sixth Cycle Housing Element is to implement AB 686 and to Affirmatively Further Fair Housing. A key tenet of implementing AB 686 is to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.



<sup>3</sup> Listed as Site 53 in the County Draft Housing Element: [General Plan Elements Updates | County of Monterey, CA](#)  
<sup>4</sup> See Government Code Section 53090, *Lawler v. City of Redding* (1992) 7 Cal.App.4th 778, 783; *Regents of the University of California v. City of Santa Monica* (1978) 77 Cal.App.3d 130, 138.  
<sup>5</sup> Site 53, See Table 7-5 (Opportunity Sites Inventory), County of Monterey Draft Housing Element.



Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all a public agency’s activities and programs relating to housing and community development.<sup>6</sup>

Carmel, with an average home price of 2.1 million dollars is exactly the type of high resource community that HCD would like to see develop more housing to break up historically segregated housing patterns. In earlier versions of the County’s draft Housing Element, Site 49 , located in the Carmel Valley, was considered a housing opportunity site. The most recent version sent to State HCD shows Site 49 has been removed from the housing inventory. This site could have provided up to 1,012 units for the County to meet its RHNA goals<sup>7</sup>. Additionally, by removing site 49 from the County’s Housing Element Inventory, the County of Monterey is taking actions directly contrary to the November 24, 2024 State HCD letter which mandates that the County implement Government Code 8890.50:

*“address all components of Affirming Fair Housing (AFFH), including segregation and integration, racially/ethnically concentrated areas of poverty and affluence and disparities in access to opportunity and disproportionate housing needs, including displacement risk”<sup>8</sup>*

## **6. Environmental Justice**

SB 1000, a law that went into effect in 2018, mandates that general plans identify and describe disadvantaged communities within the local jurisdiction and include environmental justice policies (“EJ Policies”) addressing eight topics. (Gov. Code, § 65302, subd. (h).) These EJ Policies must aim to reduce pollution exposures, improve air quality, promote public facilities, increase food access, provide safe and sanitary homes, promote physical activity, promote civic engagement in the public decision-making process, and prioritize improvements and programs that address the needs of the disadvantaged communities. (Ibid.) California law defines environmental justice to include “deterrence, reduction, and elimination of pollution burdens for populations and communities experiencing the adverse effects of that pollution, so that the effects of the pollution are not disproportionately borne by those populations and communities” and “at a minimum, the meaningful consideration of recommendations from communities most impacted by pollution into environmental and land use decisions.” (Gov. Code § 65040.12(e)(2).)

The California Office of Environmental Health Hazard Assessment developed CalEnviroScreen, a methodology to identify communities disproportionately burdened by multiple sources of pollution. Residents in census tracts with high CalEnviroScreen scores (shown as percentages) are more burdened by pollution and are more vulnerable to related effects.

According to the City’s adopted Housing Element, census tracts concentrated around the eastern portions of the Marina, had higher Cal Enviro scores than the rest of Marina and abutting census tracts.

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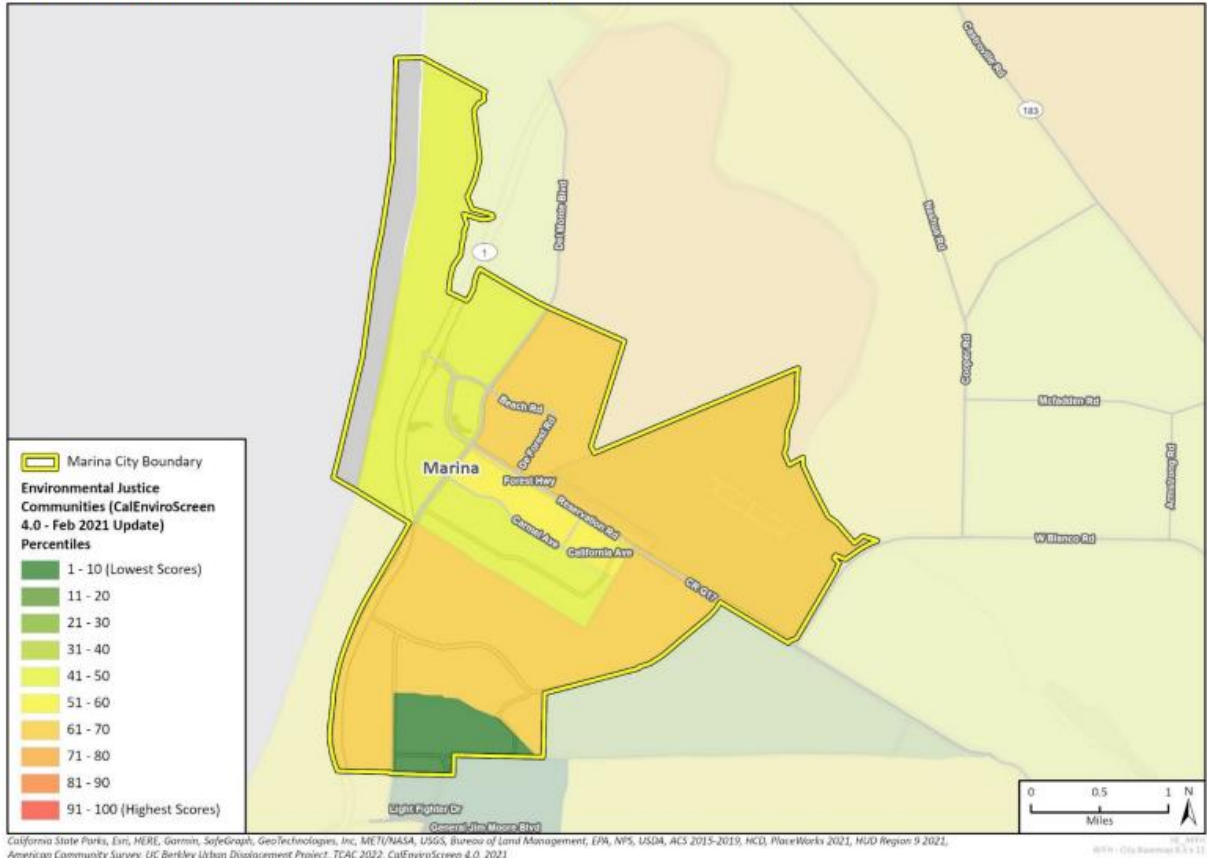
<sup>6</sup> California Department of Housing and Community Development Affirmatively Furthering Fair Housing, April 2021, [Affirmatively Furthering Fair Housing](#)

<sup>7</sup> <https://maps.co.monterey.ca.us/portal/apps/webappviewer/index.html?id=2f79227b3b1e4796898890e8dd32c00e>

<sup>8</sup> California Department of Housing and Community Development (State HCD) letter on the Draft Sixth Cycle Monterey County Housing Element, dated, November 18, 2024.

By placing housing units near the Marina airport, the County is not meeting the requirements of Senate Bill 1000 (SB 1000).

Figure A-27 CalEnviroScreen 4.0 Percentile Scores (Marina)

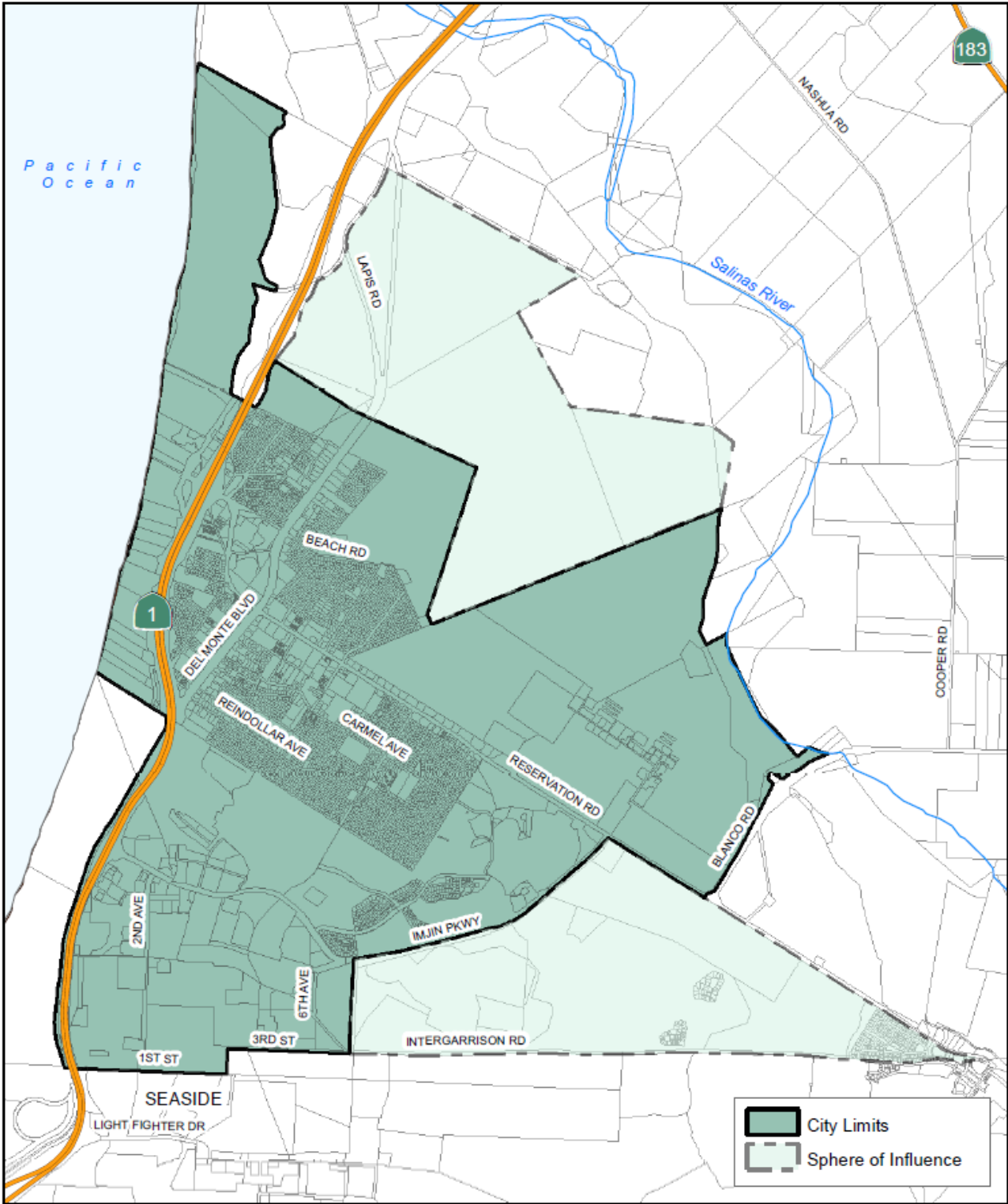


Once again, the City of Marina appreciates the opportunity to comment on the County’s Housing Element and wish you and your team success as you prepare this document. Please contact the Community Development Director, Guido F. Persicone at 831-884-1289 or by email at [gpsericone@cityofmarina.org](mailto:gpersicone@cityofmarina.org) if you have any questions.

Sincerely,

  
Bruce Delgado, Mayor  
City of Marina

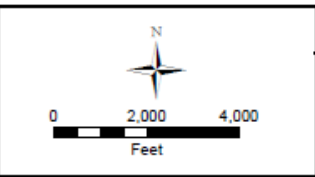
Copy: Wendy Root Askew, County of Monterey Board of Supervisors, District 4



**LAFCO of Monterey County**  
 LOCAL AGENCY FORMATION COMMISSION

P.O. Box 1369  
 Salinas, CA 99902  
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**CITIES**

**MARINA**

Last LAFCO-Approved Change: 05/28/1985  
 Sphere of Influence Affirmed: 01/24/2011  
 Map Prepared: 12/14/2012

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