

RESPONSE TO CARL HOLM APRIL 8, 2007 COMMENTARY

Carl Holm, a Monterey County land use planner and one of the primary authors of GPU4, made the following comments in a Commentary in the Herald on April 8. The League's responses follow:

1. Holm's Comment: The League released its comparison without considering an analysis offered by county planners.

Response: During our review of both plans, we called Mr. Holm to clarify issues on which we were not clear. At that time, he informed us that the County was doing a comparison/analysis. We asked that it be sent to us when it was available. We never received it and became aware recently that a County-prepared analysis has never been done.

2. Holm's Comment: Both plans allow development outside community areas. The difference is how that can occur. The Initiative allows that with a vote of the people while GPU4 would subject subdivisions to a "residential evaluation system".

Response: The Leagues' comparison states, "Allows Monterey County voters to vote on subdivisions in unincorporated areas outside Community Areas." Regarding the residential evaluation system, Mr. Holm fails to state that the system is not defined in GPU4 and is not binding on decisions makers, i.e., it is not a "pass/fail" evaluation (Policy LU-2.12).

3. Holm's Comment: The Initiative provides for no future development areas in South County except near cities.

Response: This is an objection to the Initiative, not an objective analysis of the comparison.

4. Holm's Comment: "Property Owner Requests are not areas for development but are individual properties provided a land-use designation as part of the land-use plan".

Response: After re-reviewing the Property Owner Requests, we found there are actually 22 areas rather than the 16 identified in the comparison where land use designations would be changed under GPU4 to allow more intense development (FEIR, GPU4, p. 487). For example, 439 acres in South County would be changed under GPU4 from Permanent Grazing with one unit per 40 acres to Rural Grazing - which would allow the building of clustered residential units not allowed under the existing 1982 Plan. Another request that allows intensified development would change the designation on 40 acres from "Farming" with one unit per acre to "Agricultural Industrial".

5. Holm's Comment: "...the initiative changes all land-use designations into five major categories, but the league says nothing about the initiative in this regard".

Response: The Initiative does not change all land use designations into five major categories. The Initiative (paragraph 26.3.1) states, “the (five) Major Land Use Classifications described (in the initiative) **are in addition to** (emphasis added), and do not replace, the Land Use designations described in the Countywide Land Use Plan (1982 Plan).” There is no development implication of this change.

6. Holm’s Comment: Special Treatment Areas (STAs) are land-use designations and not areas of development.

Response: The GPU4 glossary defines STAs as “an individual lot or a group of lots where unique conditions warrant special studies and policies”. An example of an STA is the Jefferson property adjacent to the City of Marina where the existing designation allows only one unit per 40 acres. GPU4 would change that designation to one unit per 2.5 acres. Another example is the 281 unit Rancho Canada in Carmel Valley that is already going through the permitting process.

7. Holm’s Comment: “About half of the ‘special treatment areas’ are in the existing (1982) general plan. The league says nothing about those being part of the Initiative”.

Response: Since the Initiative precludes subdivisions outside Community Areas, these areas would not be developed as allowed under the 1982 General Plan. One primary residential unit per legal lot of record, as well as ancillary units permitted under existing zoning, would be allowed under the Initiative and are accounted for in the total units accommodated under the Initiative.

8. Holm’s Comment: Study areas are to be reviewed for possible designation as a special treatment area requiring a general plan amendment.

Response: Study Areas are not defined anywhere in GPU4. However, a review of proposed study areas in GPU4 indicates that these are large areas intended for future development. For example, 1,493 acres in the Russell Road Study Area will be studied for future development. This is the same area that was formerly included in the Rancho San Juan Specific Plan that was rejected by 76% of the voters when it appeared on the ballot.

9. Holm’s Comment: “The league makes note of the number of new units outside community areas and specifically in the Carmel Valley relative to GPU4, but makes no effort to balance this analysis for the initiative”.

Response: There is nothing to compare. No new legal lots of record are created by the Initiative. GPU creates new legal lots, e.g., the 576 new legal lots created in Carmel Valley.

10. Holm’s Comment: “I would contend that the initiative is at best a 10-year plan and GPU4 is a 20-year plan”.

Response: Mr. Holm's contention is an opinion not supported by the language in the Initiative. The Initiative is a 25 year plan as clearly stated on p. 77 in the Initiative (See response #11).

11. Holm's Comment: "The amount of area identified for future development in GPU4 was established based on estimated future need".

Response: The number of units accommodated in GPU4 exceeds AMBAG's 2030 population and housing forecasts by 140%. In contrast, the Initiative exceeds these forecasts by 18%. The League's endorsement of the Initiative was partially based upon the fact that it will allow sufficient housing, with a margin of safety, while having significantly fewer impacts on water, traffic and public services. It is important to note that AMBAG forecasts are used by regional planning agencies such as the Air District, TAMC and MCWRA to plan for the future. The level of growth accommodated by GPU4 is not accounted for in any regional plan.

12. Holm's Comment: "Of course, housing and traffic numbers would be different when comparing a 10-year plan with a 20-year plan".

Response: We agree. However, the Initiative is for 25 years as identified above and GPU4 is for 20 years.

13. Holm's Comment: The Initiative had no quantitative analysis because a voter initiative is not required to undergo an environmental impact study. The only analysis of the initiative was done qualitatively as part of the environmental impact report for GPU4, based on a quantitative analysis on GPU4.

Response: We agree that the GPU4 EIR did not include a quantitative analysis of any alternative including the Initiative. It should have. However, even without quantification, the EIR concluded that the Initiative was the Environmentally Superior Alternative, identifying only 4 significant impacts for the Initiative. This contrasts with the 12 significant impacts identified for GPU4. This finding makes sense, since the Initiative is basically a subset of GPU4 (i.e., all development proposed for the Initiative is also included in GPU4).

14. Holm's Comment: "There are just too many references ...that echo LandWatch sound bites to be a coincidence. I simply cannot accept this as an "objective" view".

Response: Mr. Holm seems to believe that you cannot be objective and have an opinion too. The League's objective comparison provided the basis for our support of the Initiative and opposition to GPU4. The League has numerous land use positions developed over 30 years that speak directly to the general plan options. We have had these positions long before LandWatch came into existence. Is it a coincidence that LandWatch has the same positions as the League of Women Voters? Or is it more likely

that there are numerous public interest non-profit groups in Monterey County that support reasonable and responsible land use policies?