



NOTICE OF PREPARATION

DATE: October 6, 2015

TO: Responsible and Interested Agencies

FROM: City of Salinas

SUBJECT: **Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (EIR) for the proposed City of Salinas Economic Development Element.**

The City of Salinas (City) would like to know the views of your agency as to the scope and content of the environmental information that is relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering agency actions in connection with the project.

The City will be the Lead Agency and will prepare an EIR for the project described below. The City has determined that the probable environmental effects of the project include, but may not be limited to: loss of prime farmland, traffic and transportation, water supply and quality, air quality, biological resources, cultural resources, hazardous materials, aesthetics, geology and soils, storm drainage, wastewater generation and treatment, and public services. The City's final determination of environmental issues to be addressed in the EIR will consider input received in response to this NOP and to input provided at an EIR scoping meeting.

An initial study has not been prepared for the proposed project.

Due to the time limits mandated by state law, your response must be sent within thirty (30) days, or no later than December 7, 2015. All written public and agency comments should be directed to the City of Salinas Community Development Department, c/o Tara Hullinger, Planning Manager, 65 West Alisal Street, Salinas, California, 93901. Please include the name of a contact person for your agency, if applicable. A scoping meeting will also be held per Public Resources Code Section 21083.9 to solicit input from local and state agencies on the scope of the EIR. The date, time, and location for the meeting are shown below. Questions about the NOP and EDE process should be directed to Doug Yount, Project Manager, at the same address and phone number. This NOP can be found on the City of Salinas' website at: <http://www.ci.salinas.ca.us/news.cfm#EDE>, along with other information regarding the EDE.

Project Title

Economic Development Element General Plan Amendments

Project Applicant

City of Salinas
Salinas, California

Contact for Sending Responses

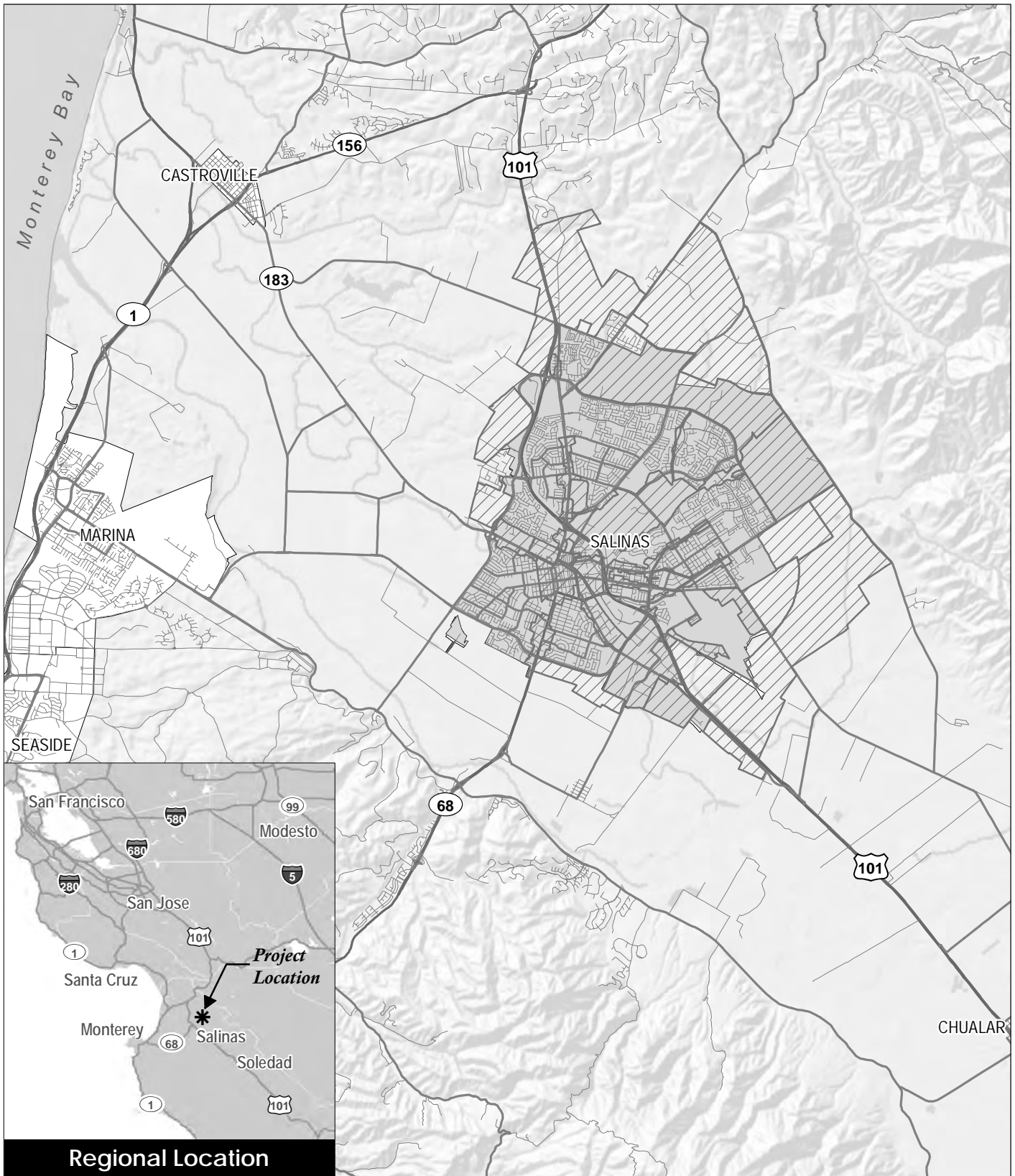
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City of Salinas
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Scoping Meeting

November 23, 2015 at 6:00 p.m.
Salinas City Hall – Rotunda
200 Lincoln Avenue
Salinas, California 93901

PROJECT PURPOSE AND BACKGROUND

The City of Salinas 2002 General Plan addresses economic development goals for the City. The location of the City is illustrated in Figure 1, Project Location. Figure 1 also shows the boundaries of economic opportunity areas, which are described in detail below. The City has since recognized that a comprehensive policy framework in the form of an economic development element be added to the General Plan as a tool to best focus and direct the City's economic development activities. The purpose of the draft Economic Development Element (EDE) is to guide future decisions of the City Council and the community in all aspects of City policy related to economic development. The City's primary interest is to raise economic development priorities to a legislative, General Plan policy level, and by doing so, ensure that economic development is considered in all City Council planning and decision making actions.



Source: Esri 2015



Figure 1

Project Location



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EDE VISION AND CONTENT

EDE Vision and Guiding Strategies and Policies

The City conducted an extensive public outreach process as part of the EDE preparation process. The purpose was to generate inputs to identify key economic development issues and priorities. As an outcome of that process, the community came together to create a vision for its economic future that is focused on enhancing prosperity through a vision of safety, jobs and health.

The fundamental components of the EDE are its goals, strategies (incorporated as “policies”) and actions that are the underpinning for realizing the economic development vision. The goals, policies and actions were directly informed by significant community input, City Council and City staff direction, the City’s broad on-going economic development efforts and programs, analysis of projected long-term market conditions, and analysis of land demand for future economic development.

The attractiveness of the City as an investment destination is contingent on a number of key factors. These include, but are not limited to: availability of land at a competitive price, availability and cost-effectiveness of infrastructure needed to support development, availability of resources for and a business environment conducive to retaining and expanding existing businesses, creation of conditions for attracting new businesses, a business environment that promotes innovation and entrepreneurship, availability of a workforce with the education and skills that match the needs of existing and new businesses, and a quality of life that attracts businesses and fosters the health and safety of residents. The EDE addresses the following broad goals, for which policies and actions are targeted at for successful economic development:

- Land Use, Circulation and Infrastructure
- Retail, Entertainment, and Tourism
- Job Opportunities
- Workforce Development
- Neighborhood and Commercial Areas
- Quality of Life

The EDE also identifies economic development action priorities through a Five-Year Action Plan. Progress towards implementing priority actions would be monitored and reported semi-annually using key economic indicators. The monitoring program and indicators are also described in the EDE.

It will take time to achieve the City's economic development vision due to the depth and breadth of aspirations embodied in that vision. For this reason, a typical 20-year general plan planning horizon will be insufficient to achieve the City's economic development. It is assumed that an implementation timeframe of 30-35 years or more will be required.

New Development Capacity

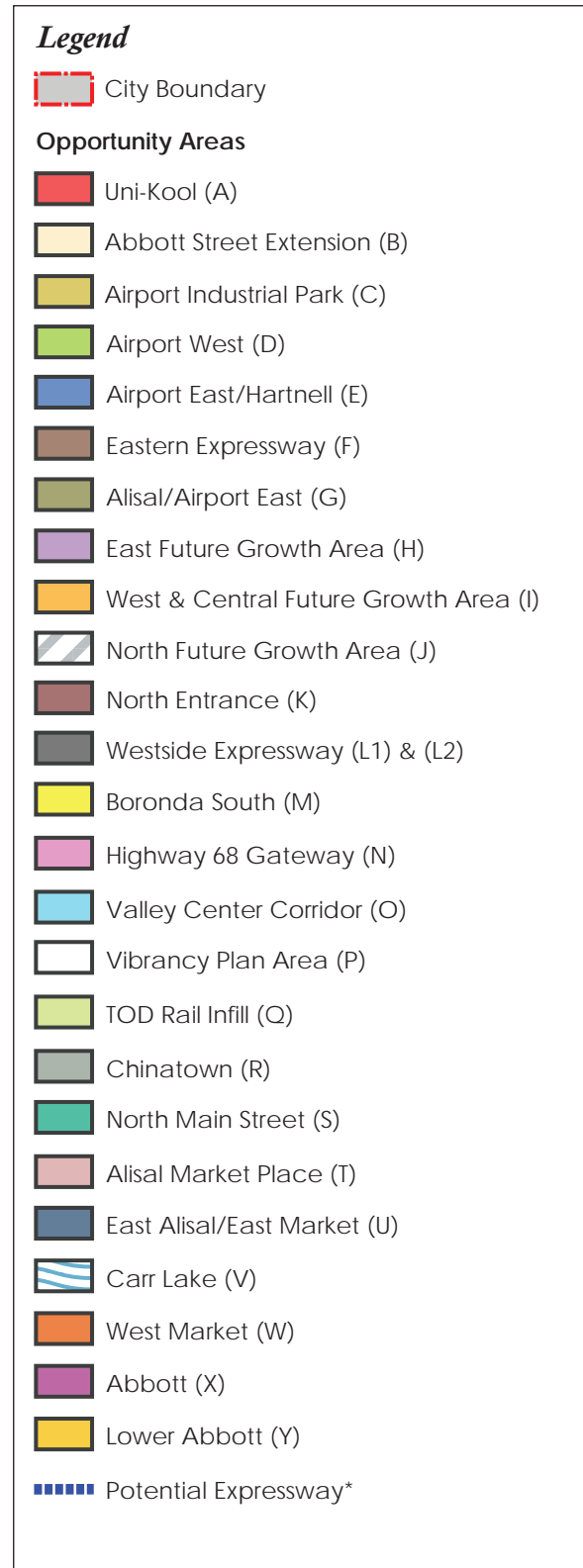
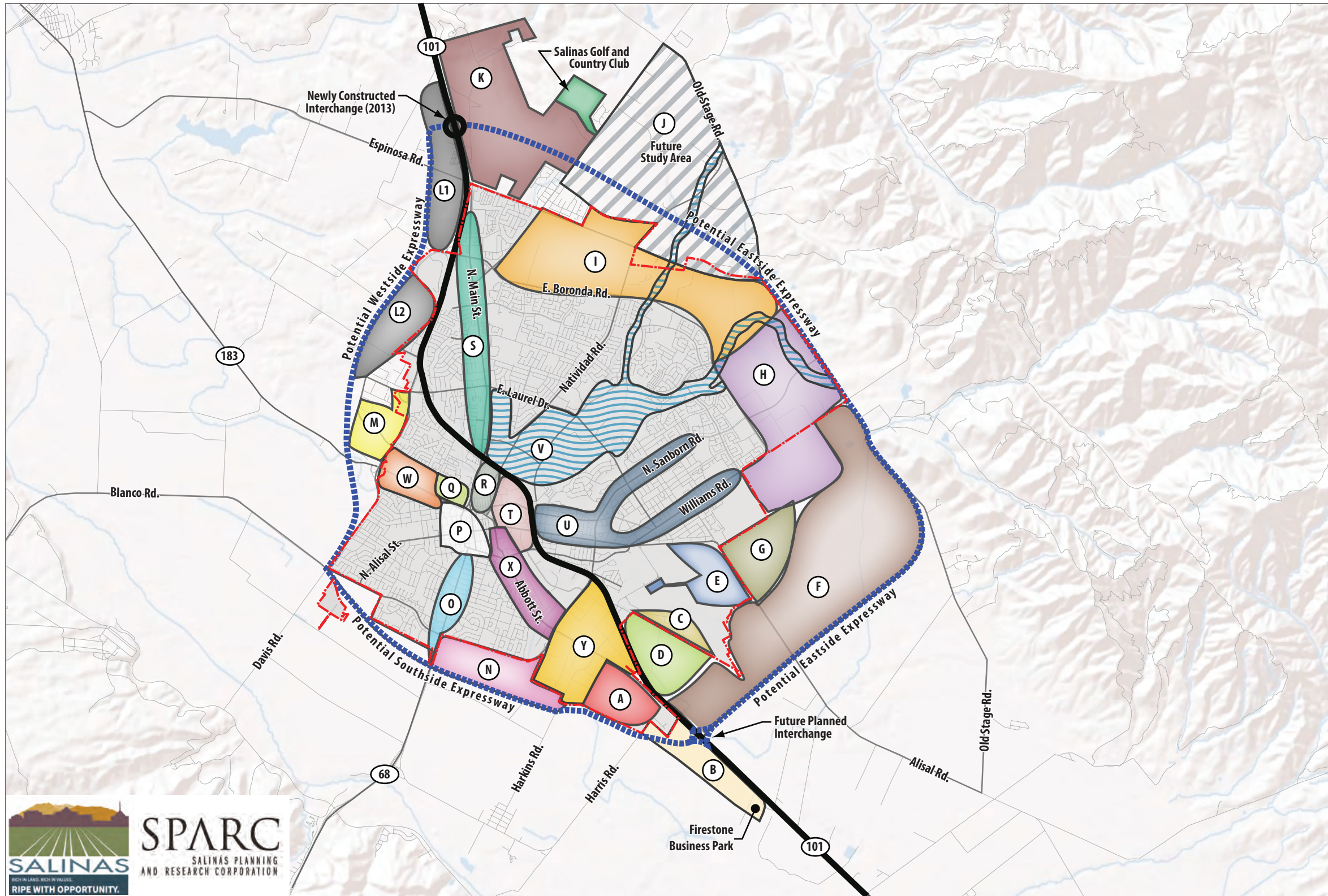
The future prosperity of Salinas is dependent on economic development both within and at the edges of the City, in the improvement of workforce skills, training, and educational opportunities, and in the enhancement of community quality of life and public services and infrastructure. Regarding land use, areas for potential future expanded economic development, referred to as Economic Opportunity Areas (EOAs), were identified and mapped through the community outreach process. A total of 25 EOAs were created and policy direction for catalyzing development opportunities in these areas was included in the EDE. Figure 2, Economic Development Areas, shows the generalized locations of the EOAs identified through the outreach process.

As part of an EDE analysis/refinement process conducted after the draft EDE was accepted by the City Council, City staff and consultants refined the Economic Development Areas map. The primary purpose was to identify and map precise boundaries for each EOA and determine acreages for each. Figure 3, Refined Economic Opportunity Area Boundaries, shows the results of this refined mapping process. Table 1, Refined Economic Development Areas List, identifies the names and acreages of each EOA as well as the location of each EOA relative to the existing city limits and the City's Sphere of Influence (SOI) boundary.

Development Capacity Assumptions for Economic Opportunity Areas within the City Limits and SOI

Nineteen of the EOAs are located within the City's SOI. Land use designations and development capacity for these EOAs are already established in the existing General Plan. Infill development on vacant land within these EOAs, especially those located within the city limits, is already assumed in existing General Plan policies. Similarly, revitalization of existing developed areas within these EOAs is also considered in the General Plan.

For several of the EOAs within the city limits, the EDE includes policies that could result in increased development capacity relative to that already defined in the existing General Plan. Representative policies call for future preparation of specific plans and/or revitalization plans for specific EOAs wherein increases in development intensity or land use changes could be proposed. However, with the exception of EOA V - Carr Lake as described below, there is no assurance that increases in development capacity for these EOAs will be proposed in the future. Therefore, no increase in development capacity for EOAs within the city limit or SOI is assumed.

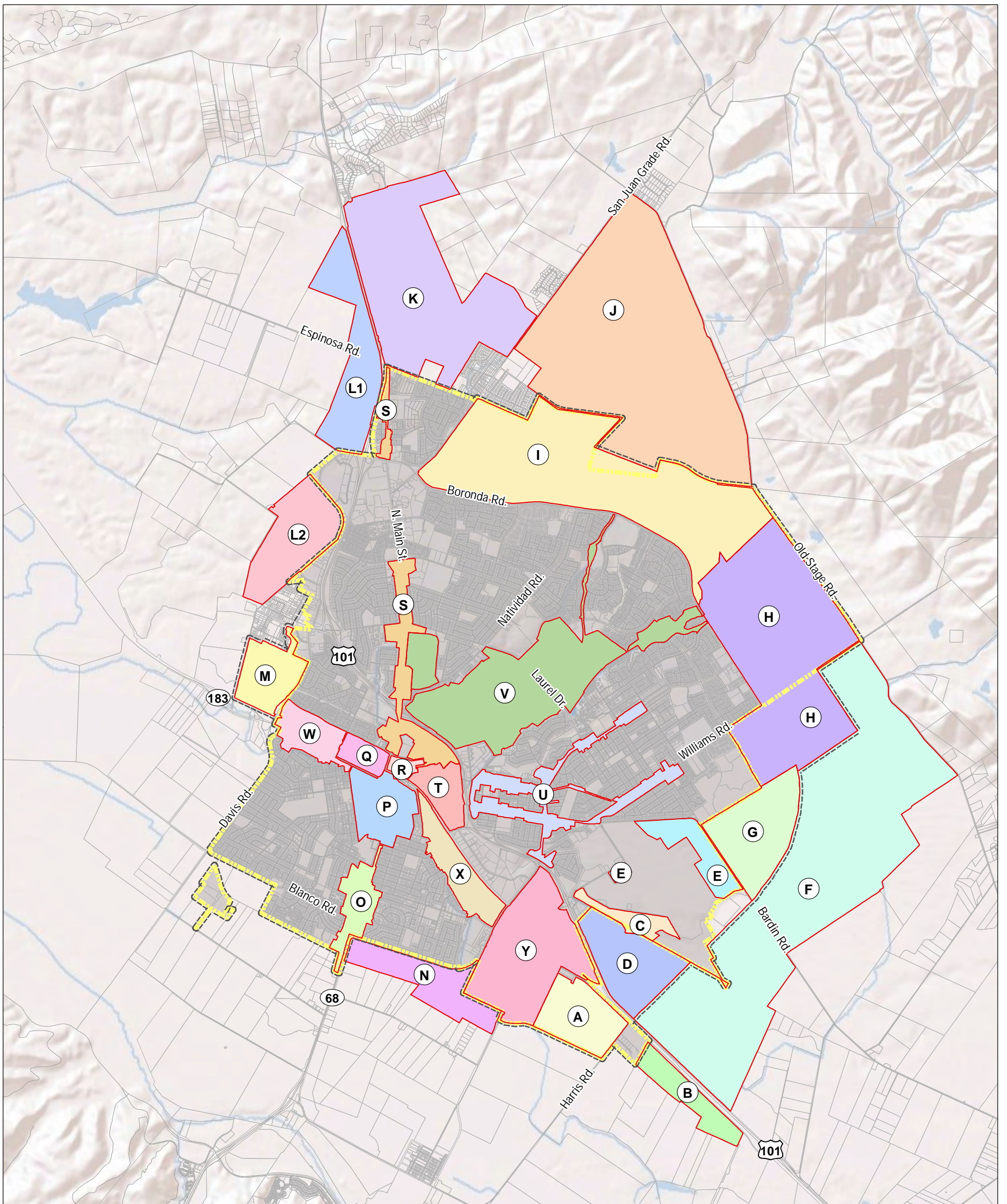


*Note: Locations of potential expressways are approximate and subject to further study
 Source: City of Salinas 2012, ESRI 2010

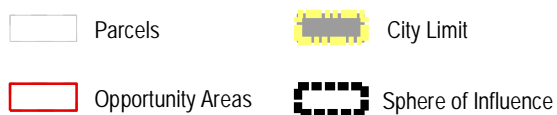
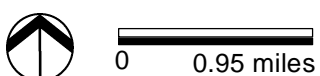


Figure 2
Economic Opportunity Areas
 Salinas Economic Development Element Program EIR NOP

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Opportunity Areas		
Uni-Kool (A)	West & Central Future Growth Area (I)	TOD Rail Infill (Q)
Abbott Street Extension (B)	North Future Growth Area (J)	Chinatown (R)
Airport Industrial Park (C)	North Entrance (K)	North Main Street (S)
Airport West (D)	Westside Expressway (L1)	Alisal Market Place (T)
Airport East/Hartnell (E)	Westside Expressway (L2)	East Alisal/East Market (U)
Eastern Expressway (F)	Boronda South (M)	Carr Lake (V)
Alisal/Airport East (G)	Highway 68 Gateway (N)	West Market (W)
East Future Growth Area (H)	Valley Center Corridor (O)	Abbott (X)
	Vibrancy Plan Area (P)	Lower Abbott (Y)



Source: City of Salinas 2014, Monterey County GIS Database 2010, Esri 2015



Figure 3
 Refined Economic Opportunity Area Boundaries
 Salinas Economic Development Element Program EIR NOP

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Table 1 Economic Opportunity Area Boundary Relationships and Acreage

Opportunity Area		Acreage	Boundary Relationships			
			City Limits		SOI	
			In	Out	In	Out
A	Uni-Kool	259.35	X			
B	Abbott Street Extension	167.65		X		X
C	Airport Industrial Park	86.16	X			
D	Airport West	343.04		X	X	
E	Airport East/Hartnell	175.98	X			
F	Eastern Expressway	2,530.04		X		X
G	Alisal/Airport East	395.63		X	X	
H	East Future Growth Area ¹	1,397.67	X	X	X	
I	West/Central Future Growth Area	1,541.43	X			
J	North Future Growth Area	2,155.76		X		X
K	North Entrance	1,190.48		X		X
L1/L2	Westside Expressway	431.05/ 378.61		X		X
M	Boronda South	208.00		X	X	
N	Highway 68 Gateway	293.23		X		X
O	Valley Center Corridor	145.49	X			
P	Vibrancy Plan Area	223.67	X			
Q	TOD Rail Infill	74.55	X			
R	Chinatown	29.17	X			
S	North Main Street	292.80	X			
T	Alisal Market Place	132.26	X			
U	East Alisal/East Market	309.82	X			
V	Carr Lake	989.89	X			
W	West Market	153.72	X			
X	Abbott	204.32	X			
Y	Lower Abbott	618.23	X			
Total		14,728.00				

Source: EMC Planning Group 2014

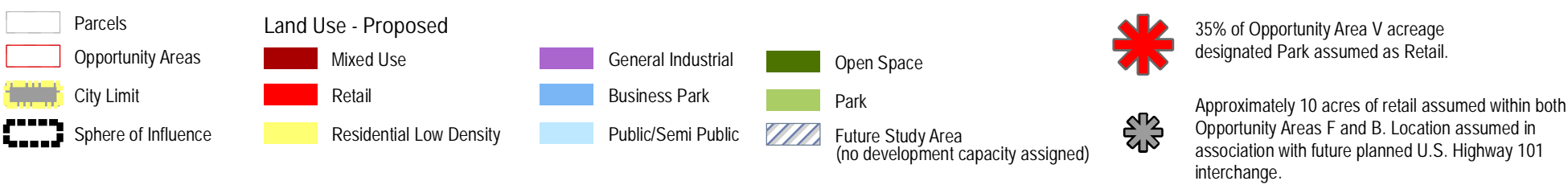
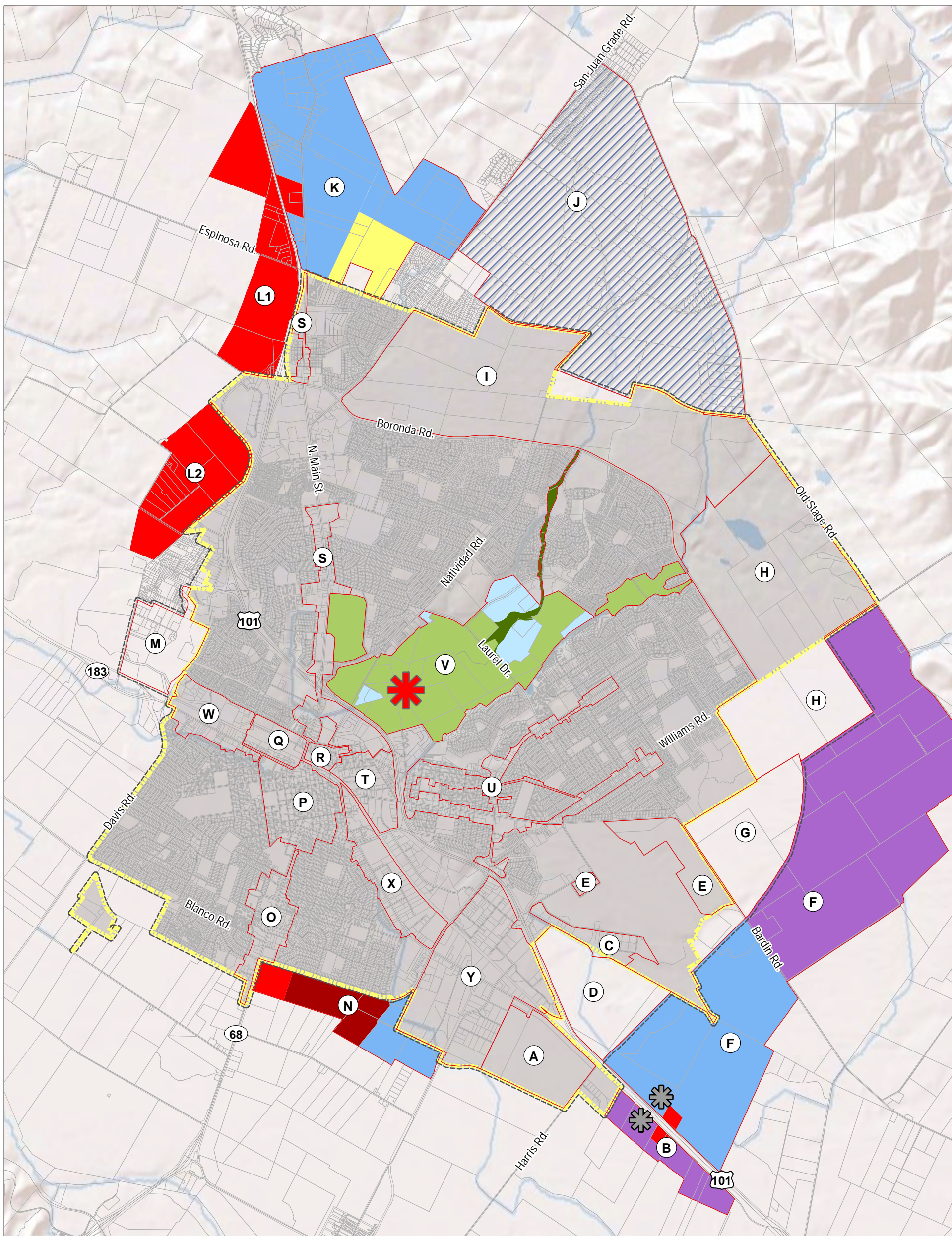
Notes: ¹The western portion of EOA H is within the City, while the eastern portion is outside the city limit, but within the SOI.

Projected New Development Capacity for Economic Opportunity Areas Outside the Existing SOI and for EOA V

Lack of available vacant land within the city limits and the existing SOI has been a constraint to the City's economic growth opportunities. Vacant, developable land is needed to accommodate expansion of existing businesses and attract new businesses to meet future employment needs, and to promote a healthy jobs to housing balance. The City has repeatedly lost desirable opportunities for private investment for this reason. A significant feature of the EDE is its policy direction for expanding the City's vacant, developable land supply to meet the City's projected employment needs. The EDE contains policies that promote job generating land uses in a manner that balances infill development and redevelopment with new development capacity on lands located contiguous to, but outside the existing SOI. The City recognizes that balancing between infill/revitalization of existing developed areas with development of vacant land at the periphery of the City is essential.

Six of the 25 EOAs identified in the EDE (EOAs B, F, J, K, L1/L2, and N) are located outside the City's existing SOI. EOA J was evaluated as a study area in the draft EDE, but was not carried forward as a potential destination for future economic development. It is illustrated only to reflect the outcome of the original EDE preparation process. In addition to the limited supply of vacant land within the existing SOI designated for job generating uses, the six EOAs are envisioned to provide additional developable land opportunities for employment generating uses. Figure 4, Refined Economic Opportunity Areas – Proposed General Plan Land Use, illustrates the locations of the five EOAs outside the SOI and the sixth EOA, EOA V – Carr Lake. Area V is the only EOA located within the SOI for which the EDE explicitly proposes an increase in development capacity relative to land uses already identified in the existing General Plan. Each of the five EOAs outside the SOI has been assigned a General Plan land use designation. The designations were identified as part of the EDE analysis process and are based on the overall EDE vision, market analyses, land use relationships, environmental/infrastructure opportunities and constraints, and other variables. Figure 4 does not show a change in land use for EOA V – Carr Lake to reflect new retail development capacity assigned to it; the new capacity is denoted with an asterisk as identified in the map legend.

EOAs located outside the SOI were identified in part to meet projected land demands for new job generating development through buildout of the General Plan. They were also identified to ensure an inventory of vacant land that is sufficient to balance land acquisition costs by promoting competition for land development opportunities, provide flexibility to respond to business location needs, and to signal the City's anticipated growth locations for economic development over a 30 to 35 year time horizon, and importantly, over a longer time horizon as envisioned by the City and EDE stakeholders.



Source: City of Salinas 2014, Monterey County GIS Database 2010, Esri 2015



Figure 4
Refined Economic Opportunity Areas - Proposed General Plan Land Use
 Salinas Economic Development Element Program EIR NOP

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New Development Capacity Analysis. Three economic development-related technical analyses were prepared to inform the EDE preparation process: 1) Salinas Retail Analysis prepared by Applied Development Economics (ADE) in 2013, Salinas Economic Development Element Target Industry Analysis prepared by ADE in 2013, and the Site Opportunities and Constraints Analysis, prepared by Economic and Planning Systems (EPS) in 2013. These reports are included in the EDE as Appendices B, C, and D, respectively. The analyses contain important data and information including, but not limited to: employment projections to meet job generation needs under General Plan buildout conditions, industry types that could be targeted to generate additional employment opportunities, land demand for accommodating employment generating uses (e.g. industrial, office, and commercial/retail uses), and capacity of vacant land located primarily within the SOI to meet projected land demand for employment generating uses. The information therein was utilized to project the employment generating capacity of vacant land within the SOI. The unmet balance of land demand for employment generating uses to be accommodated within the EOAs located outside the SOI was then evaluated.

As described in the target industry analysis, to meet the employment needs of a growing population over time and to create a healthy balance between available jobs and housing (which represents total population projected within the SOI), a total of 45,500 new jobs are needed at buildout of the existing General Plan. Job-generating Industrial uses (including agricultural related uses), Retail uses (the Retail land use designation includes a broad range of commercial development types), and Business Park uses are projected to account for about 20,843 of the total jobs. Development of institutional and visitor-serving job-generating uses is expected to account for the balance of 24,157 jobs. These projections reflect an ideal number and distribution of jobs to represent a mature city economy with a full range of services and opportunities.

Using employment density factors (number of jobs created per acre or 1,000 square feet of new retail, industrial, or business park uses), the total number of net acres of land needed for new job-generating industrial, retail, and business park land uses is shown in Table 2, Land Demand for Employment Generating Industrial, Retail, and Business Park Land Uses at General Plan Buildout. The table summarizes the total land demand in net acres and the building square feet that can be accommodated within land needed for these types of employment-generating development. Net land demand is estimated at 973 acres. Land demand for job-generating Institutional and Visitor-Serving uses is not included in Table 2. It is assumed that job-generating development within these two types of land uses can be accommodated on vacant infill lands within the city limits and/or through redevelopment/revitalization of existing developed areas within the city limits.

Table 2 Land Demand for Employment Generating Industrial, Retail, and Business Park Land Uses Land Uses at General Plan Buildout

Land Use	Jobs Needed at General Plan Buildout	Land Demand (net acres)	FAR ¹	Building Demand (square feet)
Industrial ²	10,287	591	.30	7,715,347
Retail	3,985	201	.25	2,192,157
Business Park	6,571	181	.35	2,759,526
Total	20,843	973		12,667,030

Source: Data from and revision to Table 12 in Salinas Economic Development Element Target Industry Analysis, ADE 2013.

Note: ¹FAR from Table 12 in Salinas Economic Development Element Target Industry Analysis, ADE 2013.replaced with FAR standards from City of Salinas General Plan.

²Includes both agricultural sector and industrial sector development types shown in Table 12 in Salinas Economic Development Element Target Industry Analysis, ADE 2013.

As is standard practice for determining employment generating land demand, the land demand acreage shown in Table 2 has been increased with a “market efficiency factor” of 20 percent to promote development investment. This market efficiency factor takes into account the notion that as land supply for employment generating uses tightens, land prices increase, and overall market dynamics begin to break down. The 20 percent increment of additional land capacity promotes market efficiency by promoting land sale price competition among landowners. With the 20 percent addition, total land demand for employment generating land uses increases to 1,127 acres and total building capacity increases to 14,762,005 square feet as shown in Table 3, Total Net Land Demand and Total Building Capacity Needed for New Employment Generating Uses.

Table 3 Total Net Land Demand and Total Building Capacity Needed for New Employment Generating Uses

Land Use	Land Demand (net acres)	20 Percent Buffer (net acres)	Net Land Demand (net acres)	Total Building (square feet)
Industrial	591	118	709	9,258,417
Retail	201	NA	201	2,192,157
Business Park	181	36	217	3,311,431
Total	973		1,127	14,762,005

The City’s intent is to balance development of vacant infill land within the SOI with development of vacant land outside the SOI, while meeting the total net land demand shown in

Table 3. For this purpose, the gross and net acreage of vacant land supply (and resulting building development capacity) by land use type was first calculated for EOAs A, C, D, E, F, and V located within the SOI. EOAs A, C, D, E, and G constitute the remaining, large, vacant parcels of land within the SOI that are designated for job generating land uses. EOA V is designated in the EDE as a proposed new destination for recreation supporting retail development. Table 4, Land Supply of EOAs within the Sphere of Influence, shows that 1,207 gross acres is available for development within these EOAs. Net acreage available for new building capacity is lower (781 acres) given land required for infrastructure, roads, avoiding environmental constraints, etc. Gross acreage has been reduced by 35 percent to account for the land requirement. Available building capacity is 10,306,666 square feet after application of General Plan FARs to each land use.

Table 4 Land Supply of EOAs within the Sphere of Influence

EOA	Land Use	Gross Acres ¹	Net Acres ²	FAR	Building Square Feet ³
A – Ag Industrial Park	Industrial	259	169	.30	2,202,971
C – Airport Industrial Park	Industrial	86	56	.30	731,860
D – Airport West	Industrial	172 ⁴	111	.30	1,456,883
G – Alisal/Airport East	Industrial	396	257	.30	3,358,476
Subtotal Industrial		913	593		7,752,274
V – Carr Lake	Retail	115 ⁵	74	.25	810,448
E - Airport East	Business Park	176	114	.35	1,743,944
Total		1,207	781		10,306,666

Source: Data from and revision to Table 12 in Salinas Economic Development Element Target Industry Analysis, ADE 2013.

Note: ¹Gross acreage based on Table 1 except where noted.

²Net acreage is .65 x gross acreage to reflect land deductions for infrastructure, site constraints, etc. Net acres are rounded to the nearest acre.

³Building square footages reflect net acres to two decimal places.

⁴Gross acreage reduced by 50 percent from 343 acres to 172 acres to reflect that much of the EOA is within a floodplain.

⁵Gross acreage is reduced from 990 acres to 115 acres to reflect underlying Open Space and Public/Semi-Public land use designations and to reflect the portion of EOAV for which the City is considering a General Plan land use change as part of the EDE.

Land Demand/Building Capacity for EOAs Outside the SOI. The balance of land demand/development capacity needed within EOAs located outside the SOI is equal to the total land demand/building capacity required as shown in Table 3 minus the total shown in Table 4 for EOAs located within the SOI. For EOAs located outside the SOI, a total of 442 gross acres

of land is required with a minimum building capacity of 4,455,299 square feet. Table 5, Land Demand/Building Capacity Required in EOAs Outside the Sphere of Influence, summarizes gross land demand, net land demand, and building capacity based on General Plan FARs for each land use. Approximately 147 gross acres or 1.5 million square feet of industrial building capacity, 164 gross acres or 1.4 million square feet of retail building capacity, and 132 gross acres or 1.57 million square feet of business park building capacity is needed.

Table 5 Land Demand/Building Capacity Required in EOAs Outside the Sphere of Influence¹

Land Use	Land Demand (gross acres)	Land Demand (net acres) ²	FAR	Building Capacity (square feet)
Industrial	147	115	.30	1,502,820
Retail	164	127	.25	1,383,030
Business Park	132	103	.35	1,570,338
Total	442	345		4,456,188

Source: ADE 2015, EMC Planning Group 2015

Note: ¹Data derived by subtracting land supply data in Table 4 from total land demand data in Table 3 for each respective land use type.

²Net acreage equals .65 x gross acreage to reflect land deductions for infrastructure, site constraints, etc., plus 20 percent land efficiency factor.

³Total building capacity slightly exceeds required minimum of 4,455,299 square feet due to rounding.

Distribution of Land Demand Among EOAs Located Outside the SOI. The 442 gross acres of additional land demand has been distributed to the EOAs outside the SOI as shown in Table 6, Distribution of Land Demand to EOAs Located Outside the SOI. Land demand for each land use type has been distributed to EOAs that are designated the same land use. Please refer back to Figure 4 for EOA land use designations. All industrial land demand acreage is allocated to EOA B, while the entire portion of EOA F that is designated Industrial is retained as economic development reserve. Business park land demand acreage is allocated to EOA K, with the Business Park designation portion of EOA N retained as economic development reserve. Retail land demand acreage is allocated first to EOAs B, F, K, and N, with the balance allocated to EOA L2, and EOA L1 retained as economic development reserve. The allocation of retail land demand was informed by the retail market analysis, the target industry analysis, and the site opportunities and constraints analysis.

Table 6 Distribution of Land Demand to EOAs Located Outside the SOI

EOA	Land Use	% of Total Land Use Designation	Land Demand (gross acres)	Land Demand (net acres)	Building Capacity (square feet) ¹
B	Industrial	100%	147	115	1,502,820
F	Industrial	0%	0	0	0
Subtotal Industrial			147	115	1,502,820
B	Retail	---	10	8	87,120
F	Retail	---	10	8	87,120
K	Retail	---	30	23	250,470
L1/L1	Retail	---	74	57	620,730
N	Retail	---	40	31	337,590
Retail Subtotal			164	127	1,383,030
K	Business Park	100%	132	103	1,570,338
N	Business Park	0%	0		0
Business Park Subtotal			132	103	1,570,338
Total			443		4,445,511 ²

Source: ADE 2015 and EMC Planning Group 2015

Note: ¹Building capacity based on General Plan FAR of .30 for Industrial, .25 for Retail, and .35 for Business Park.

²Total building square footage differs from Table 5 total building square footage due to rounding.

The areas within each EOA to which the land demand acreage shown in Table 6 has been allocated are illustrated in Figure 5, Distribution of Land Demand to EOAs Located Outside the SOI. These areas are hereinafter referred to as “EOA target areas”. Several variables were considered in distributing land demand and development capacity to the EOA target areas. The first was land use type - land demand for each respective land use type was assigned to EOAs with matching land use designations. Additional general variables included prioritizing sites located adjacent to existing urban development, sites to which existing utility infrastructure is assumed to be most readily extended (detailed infrastructure analysis has not been conducted to date for this purpose), and sites with proximity to transportation access. Potential environmental/hazard constraints (e.g. location of flood hazard areas) that might otherwise limit development potential were also considered as was the need to reduce conversion of the most productive agricultural lands adjacent to the City. No land demand was assigned to EOA J (as described previously) because land use demand for this area is not defined.

Note that the land demand/building development capacity shown in Table 5 for EOA V - Carr Lake, is also distributed into a target area as shown in Figure 5.

The EOA target areas generally comprise a small percentage of the land area within each of their respective EOAs. The balance of land within each EOA, as with all land within EOA J is shown in Figure 5 as “economic development reserve”. No development capacity has been assigned to the economic development reserve areas. The reserve areas illustrate locations where the City may look to expand over the very long term (beyond buildout of the current General Plan) to implement the long-term economic development vision embodied in the EDE. The City is likely to undertake an update to the General Plan within the next several years. As part of the update, the City could elect to integrate both the EOA target areas and the economic development reserve areas into a new General Plan as is, or modify one or both based on analysis conducted at that time. The General Plan update would trigger the need for an EIR in which the effects of any changes to the EOA target areas or development capacity proposed outside the SOI at that time would be evaluated.

Total New EDE Development Capacity

The EDE EIR will assess the potential environmental impacts of future development based on the total new development capacity that would be made possible with approval of the EDE general plan amendments. The total new development capacity consists of that proposed within EOA target areas located outside the SOI as summarized in Table 6 plus the new development capacity as shown in Table 5 within the target area for EOA V - Carr Lake. The total is summarized in Table 7, Total New EDE Development Capacity.

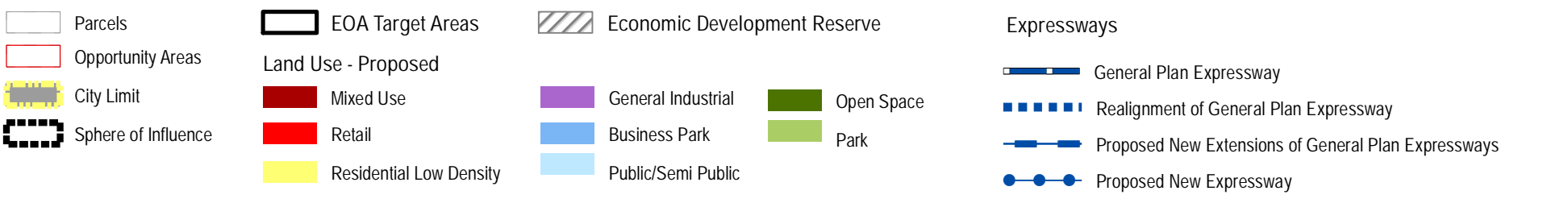
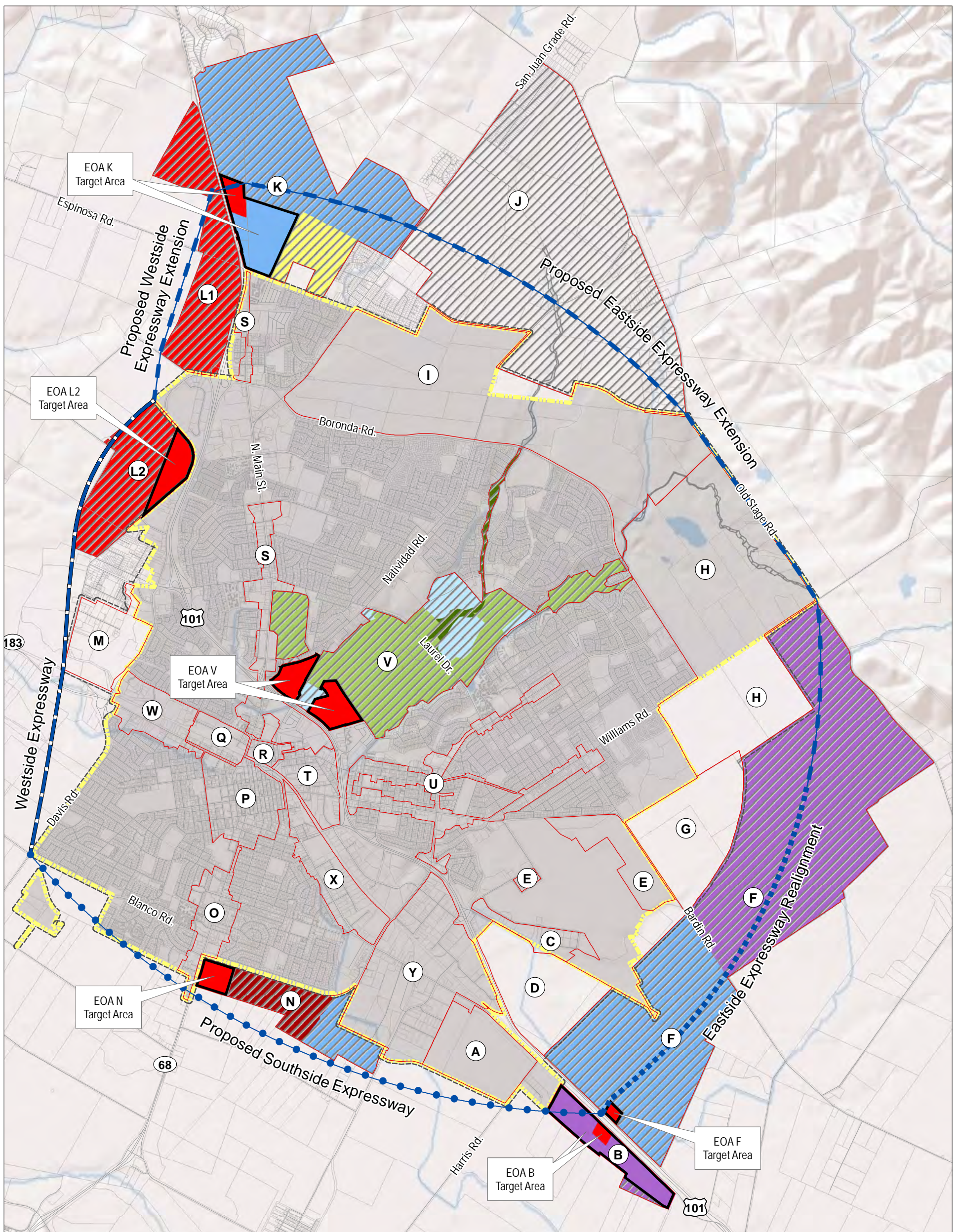
Table 7 Total New EDE Development Capacity

Location	New Land Supply (gross acres)	New Building Capacity (square feet)
EOA Target Areas Outside the SOI	443	4,445,511 ¹
EOA V - Carr Lake	74	810,448
Total	517	5,255,959

Source: ADE 2015 and EMC Planning Group 2015

Note: ¹Total building square footage differs from Table 5 total building square footage due to rounding.

As described in the Scope of Environmental Effects to be Analyzed section below, the EIR will evaluate the potential environmental impacts of future development within the 517 total acres contained within the EOA target areas within which a potential total of 5,255,959 square feet of new building potential is assumed.



Source: City of Salinas 2014, Monterey County GIS Database 2010, Esri 2015



Figure 5
EOA Target Areas and Economic Development Reserve Areas

Salinas Economic Development Element Program EIR NOP

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The locations of the EOA target areas are illustrative. Their locations are not intended to be restrictive, but rather will be used in the EIR to direct the assessment of environmental effects as needed. It is possible that future development projects could be proposed in locations within an economic development reserve area instead of within a target area. If this occurs, such projects could create significant environmental effects that are not identified in the EDE EIR, and consequently, additional CEQA documentation in the form of a project specific EIR or negative declaration may be required. Projects proposed within the EOA target areas and economic opportunity reserve areas must also be evaluated for their consistency with Monterey County Local Agency Formation Commission SOI and annexation policies, including policies related to the logical expansion of urban boundaries and logical expansion of urban services and utilities.

New Infrastructure

The EDE includes policies and programs for expanding circulation and utility infrastructure to support new economic development. Generally, the types and locations of specific infrastructure improvements that may be needed are not identified in the EDE, but would be proposed at the time specific development projects are proposed. Key exceptions include EDE policies that call for the relocation/extension of two highways identified in the General Plan, the Westside Bypass and the Eastside Bypass, and construction of a new expressway, the Southside Expressway. The impacts of constructing and operating the Westside Bypass and the Eastside Bypass as proposed in the General Plan were evaluated in the General Plan EIR. The EDE includes policy that modifies the alignment of the Eastside Bypass as it is shown in the General Plan by moving it to the east and connecting its southern terminus to a planned interchange on U.S. Highway 101. EDE policies also propose extending each of the respective expressways to the north to connect to the new Espinosa Road/U.S. Highway 101 interchange. A new Southside Expressway is proposed. It extends from the Blanco Road/Davis Road intersection to the planned U.S. Highway 101 interchange.

Figure 5 shows the locations of the existing/planned roadways. Note that the General Plan term “bypass” has been replaced with the EDE term “expressway” in Figure 5. The term bypass was used in the General Plan to denote the purpose of these roadways (to bypass congested areas of the City). The term expressway is used in the EDE to denote both the purpose of the roadways and their desired functional roadway classification. The alignments shown are conceptual. Additional EDE policies call for detailed analyses to identify expressway plan lines and funding mechanisms.

PROPOSED APPROVALS

The City plans to adopt the EDE as a general plan amendment such that the EDE becomes a new General Plan element. In addition, the City proposes to integrate the basic content of this new element into the existing General Plan by making limited additions to and modifications of text, graphics, tables, and policies. The purpose is to ensure that the EDE content is accounted for in other elements. Most of these additional ancillary amendments would occur in the Land Use Element to account for the new development capacity afforded by the EDE.

At this time, the City does not propose any other planning or land use entitlement actions. In the future, the City may consider proposals for new development within the EOAs. For EOAs located outside the SOI, the City would apply to and must receive approval from the Monterey County Local Agency Formation Commission to amend its SOI and to annex the subject land. In parallel with or subsequent to Monterey County Local Agency Formation Commission approvals, the City could consider applications for specific development projects within the EOA target areas. These actions would be subject to additional CEQA review, with CEQA documentation incorporating information from the EDE EIR as described below. Future plans or projects for EOAs within the existing SOI that intensify development relative to that identified in the existing General Plan would also be subject to additional CEQA review.

SCOPE OF ENVIRONMENTAL EFFECTS TO BE ANALYZED

The City has determined that a program EIR will be prepared to evaluate the direct and indirect physical impacts resulting from buildout of the subject EOAs for which new development capacity is assumed, including impacts of constructing/operating other related physical development including a new expressway and extensions of expressways identified in the General Plan as previously described.

CEQA Guidelines section 15146 states that, “The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.”

The EIR will evaluate the environmental impacts of developing 517 acres of land and up to 5,255,959 square feet of new building capacity located outside the SOI and within EOA V, Carr Lake, as well as impacts of realigning/extending expressways identified in the General Plan and of constructing a new expressway. Impacts will be evaluated at the level of specificity provided in the EDE and the EIR project description. Additional CEQA review will be required for individual, specific development proposed within any of the subject EOAs. CEQA documentation such as an EIR or negative declaration for future individual development projects may be “tiered” from the EDE EIR for projects that are consistent with the land use

designation and zoning for EOA target areas. “Tiering” means the coverage of general matters and environmental effects in an EIR prepared for a policy, plan, program or ordinance followed by narrower or site-specific EIRs or negative declarations that incorporate by reference the discussion in any prior EIR and which concentrate on the environmental effects that: a) are capable of being mitigated, or b) were not analyzed as significant effects on the environment in the prior EIR. Tiering can help streamline the environmental review process for future projects. Such projects may not require an EIR or negative declaration if they do not have potential to create new or more intense impacts than identified in the EDE EIR.

An EIR or a negative declaration may be required if future projects are proposed outside the EOA target areas, but within an economic development reserve area, and the projects have potential to result in significant effects that are not adequately addressed in the EDE EIR.

The types of probable environmental effects and scope of analysis associated with buildout of the subject EOAs are summarized below.

Aesthetics

The proposed project could result in an expansion of the City’s urban development footprint. This would change visual resource conditions at the boundary of the urban/agricultural fringe and at entryways to the City, especially as viewed from U.S. Highway 101 and State Route 68. New development would also result in increased night time lighting and potential for glare. This section of the EIR will address the potential for these and other visual impacts associated with implementation of the EDE.

Agricultural Resources

Development of the EOA target areas would expand urban development onto land classified by the California Department of Conservation as Prime Farmland. Prime Farmland would be converted from agricultural use to non-agricultural use. It is possible that land use conflicts between expanded urban areas and adjacent agricultural lands could be created. This section of the EIR will address impacts to agricultural resources including the conversion of Important Farmland to non-agricultural use, potential conflicts with the Williamson Act, and potential impacts associated with land use conflicts where urban development could be proposed adjacent to active agricultural uses.

Air Quality

This section of the EIR will include an air quality analysis using the Monterey Bay Unified Air Pollution Control District’s methodology, focusing on consistency with current air quality plan control measures, analysis of air emission volumes, analysis of projected vehicle miles travelled

and/or vehicle trips, and comparison of emissions volumes to significance thresholds. Potential for impacts from toxic air contaminants will also be evaluated. Criteria emissions will be modeled using the California Emissions Estimator Model.

Biological Resources

This section of the EIR will include discussion of existing biological resources within the EOA target areas, potential impacts to special-status species both within and outside of the EOA target areas, impacts to riparian habitat or other sensitive natural communities if any, impacts to federally-protected wetlands, impacts to wildlife movement, and conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Cultural Resources

Potential to cause damage to pre-historic, historic, and paleontological resources within the EOA target areas are possible to the extent that such resources are or may be present. An evaluation of existing resources and potential for resources to occur will be conducted. This section of the EIR will address the potential for impacts to pre-historic, historic, and paleontological resources associated with General Plan buildout. The evaluation will be based on a cultural resources assessment to be prepared by William Self & Associates.

Greenhouse Gas Emissions

This section of the EIR will include a greenhouse gas emissions analysis using the Monterey Bay Unified Air Pollution Control District's direction for evaluating greenhouse gas emissions impacts from implementation of a plan. The Monterey Bay Unified Air Pollution Control District has been recommending use of guidance provided by the San Luis Obispo Air Quality Management District for assessing greenhouse gas emissions impacts. Emissions will be modeled using the California Emissions Estimator Model. The analysis will include discussion of greenhouse gas emissions reductions that would accrue due to state measures being implemented consistent with AB 32 and identify program-level reduction measures for inclusion in future individual development projects proposed within EOA target areas as may be required to reduce impacts.

Geology and Soils

This section of the EIR will address potential impacts on new development related to earthquake faults, seismic ground shaking, ground failure, landslides, soil erosion, and expansive soils. The analysis will be based on existing information derived from existing geotechnical analyses and the General Plan EIR.

Hazards and Hazardous Materials

This section of the EIR will address the known hazardous materials within the EOA target areas that are included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5. This section will also address potential for new development to create risks to public health and safety from the use, storage and transport of hazardous materials; adopted emergency response plan or emergency evacuation plans; and exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildland areas are adjacent to urbanized areas.

Hydrology and Water Quality

Future development within the EOA target areas could be exposed to flood hazards, increase flood hazard potential, and contribute to water quality degradation. This section of the EIR will address flooding, drainage patterns and systems, and water quality. Storm drainage and water quality effects will be evaluated in light of the City's Stormwater Development Standards, including low impact development, with which future development within the EOA target areas will need to be consistent.

Noise

This section of the EIR will address construction noise/vibration, traffic noise, and potential stationary noise sources associated with buildout of the EOA target areas. Impacts will be evaluated in the context of General Plan noise and land use compatibility policies and standards. An acoustical analysis will be prepared by Illingworth & Rodkin for use in this analysis.

Police Protection Service

This section of the EIR will be prepared based on consultation with the City of Salinas Police Department regarding the capacity of the department to serve buildout of the EOA target areas. Need for new police facilities whose construction could have significant impacts will be identified.

Fire Protection Service

This section of the EIR will be prepared based on consultation with the Salinas Fire Department regarding the capacity of the department to serve buildout of the EOA target areas. Need for new fire protection facilities whose construction could have significant impacts will be identified.

Schools

None of the EOA target areas carry General Plan land use designations that allow residential development. Residential development is associated with “producing” school-age children that must be accommodated within local schools. Since no new school-age children will result from the proposed project, school impacts will not be evaluated.

Water Demand and Groundwater Resources

This section of the EIR will focus on the capability of the applicable water service providers (Cal Water and Alco Water Service) to provide potable and recycled water to accommodate buildout of the EOA target areas and whether any new or expanded facilities or entitlements are required. Sufficiency of water supply is a key issue for the proposed project and for all future development within the boundary of the Salinas Valley Groundwater Basin, the current single water supply source for urban development within the Salinas Valley. Net water demand will be evaluated by determining existing baseline demand (largely from agricultural production) and subtracting that demand from projected demand from new development contemplated in the EDE. Options for potential future supplemental water supply will be described as needed.

Wastewater

This section of the EIR will focus on the capability of the City to convey wastewater and the capacity of the Monterey Regional Water Pollution Control Agency to provide wastewater conveyance and treatment to accommodate buildout of the EOA target areas, and whether any new or expanded facilities are required. Net wastewater generation volume will be evaluated by determining existing baseline demand and subtracting that volume from projected generation from future developed uses within the EOA target areas.

Transportation

Development of the EOA target areas will generate a substantial increase in vehicle trips and vehicle miles traveled. This section of the EIR will address buildout impacts on multimodal transportation system including roadways/vehicle transportation, pedestrian facilities, bikeways, public transit, vehicular transportation, parking, and goods movement. A detailed traffic impact analysis will be prepared by Fehr & Peers, which will be used as the basis of the impact analysis. In collaboration with the Association of Monterey Bay Area Governments, the City is currently developing a citywide traffic model that will be used to model impacts of implementing the EDE.

Mineral Resources

This section of the EIR will address potential impacts to the availability of designated mineral resources associated with development of the EOA target areas should such minerals be present.

Solid Waste

This section of the EIR will address potential impacts to relevant landfill(s) based upon solid waste generated from new development within the EOA target areas.

Energy Demand

This section of the EIR will address anticipated energy consumption associated with demand from new development within the EOA target areas, as well as energy conservation measures to be included in future development projects.

Cumulative Impacts

The cumulative effects of buildout of the EOA target areas, combined with other relevant plans and programs, will be analyzed in this section of the EIR. Issues to be addressed in this section include mobility and transportation, air quality, greenhouse gas emissions, energy, water supply, biological resources, solid waste, and wastewater.

Growth Inducement

In accordance with CEQA Guidelines section 15126.2(d) the EIR will include a discussion of the growth-inducing impacts of buildout of the EOA target areas.

Alternatives

In accordance with CEQA Guidelines section 15126.6 the EIR will include analysis of a reasonable range of alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. An evaluation of the comparative merits of the alternatives will be presented.

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November 30, 2015

Tara Hullinger, Planning Manager
Community Development Department
City of Salinas
65 West Alisal Street
Salinas, California 93901
Email: tarah@ci.salinas.ca.us

SUBJECT: Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (EIR) for the proposed City of Salinas Economic Development Element

Dear Ms. Hullinger:

LandWatch Monterey County has the following comments regarding the referenced document:

1. Alternatives. The DEIR should address the following alternatives:
 - A. A compact growth alternative that would include re-designating for commercial or industrial use some of the vacant land that is currently designated for residential use in order to minimize or avoid impacts associated with sprawl such as the loss of agricultural land and increased vehicle miles traveled (VMT).
 - B. Adoption of policies to encourage in-fill and revitalization to minimize or avoid impacts associated with sprawl such as loss of agricultural land and increased VMT. CAPCOA's guidance for minimizing GHG emissions through compact development measures should be considered, e.g., the transportation measures in section 3.1, 3.2, 3.3, 3.5, and 3.6 of CAPCOA's Quantifying Greenhouse Gas Mitigation Measures (201 – see <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>)
2. The DEIR should include the following information about baseline conditions:
 - A. A summary table identifying the amount of vacant land and its land use designation within the City boundaries and existing Sphere of Influence. The DEIR should also identify the amount of acreage by area proposed for annexation.

B. Identification of existing vacant buildings within downtown and central city areas. Additionally, it should identify approved and unconstructed commercial and industrial projects such as the Uni-Kool Ag Industrial Center.

C. Identification of properties included in the plan for which the Ag Land Trust already maintains easements.

3. The DEIR should include a cumulative water supply impact analysis that does not assume, without evidence, that there is no impact from replacing agricultural land with urban uses as long as the on-site water use declines. It should not be assumed that the water impact analysis can be confined to the on-site effects of replacing agricultural land with urban uses. Trend analysis of urbanization of agricultural land and of conversions of habitat land to agriculture suggest that displaced farming use from urbanization causes conversion of additional habitat land to provide replacement farmland. Thus, urban sprawl could accelerate conversions of habitat land for agriculture at the margins of the Valley, with the net effect of an increase in cumulative water demand from the Salinas Valley Groundwater Basin even if the demand at the urbanized sites declines.

The DEIR should also assess the cumulative impacts on habitat from expansion of the urban boundaries that may result in conversion of habitat land at the margins of the Valley in order to replace agricultural land lost to urbanization.

Thank you for the opportunity to comment on the NOP.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. White", enclosed in a thin black rectangular border.

Amy L. White
Executive Director

From: [Doug Yount](mailto:Doug.Yount)
To: [Tara Hullinger](mailto:Tara.Hullinger)
Cc: [Ron Sissem](mailto:Ron.Sissem); [Andy Myrick](mailto:Andy.Myrick)
Subject: Re: Scoping for Draft EIR NOP for proposed City of Salinas Economic Devel. Element
Date: Tuesday, December 08, 2015 9:13:46 AM

From: mjdelpiero@aol.com [<mailto:mjdelpiero@aol.com>]

Sent: Monday, December 07, 2015 2:43 PM

To: Tara Hullinger <tarah@ci.salinas.ca.us>; mckennak@monterey.lafco.ca.gov;
sdarington@redshift.com; Tara Hullinger <tarah@ci.salinas.ca.us>

Subject: Scoping for Draft EIR NOP for proposed City of Salinas Economic Devel. Element

From: Ag Land Trust of Monterey County (Sherwood Darington, Managing Director)

To: T. Hullinger; Alan Stumpf ; Kate McKenna

RE: NOP for draft EIR

On behalf of the Ag Land Trust of Monterey County, please accept the following comments on the Notice of Preparation for the draft Program EIR for the proposed City of Salinas Economic Development Element General Plan Amendments.

1. The Ag Land Trust hereby incorporates by reference, and adopts as its' own, and hereby submits to the city (as the Trust's partial comments) the contents of the five (5) pages herewith attached to this e-mail, including the prior comments provided by Land Watch of Monterey County and the attached maps showing the existing agricultural land conservation easements and fee title parcels in the ownership of the Ag Land Trust. The Ag Land Trust currently holds over 26,000 acres of agricultural conservation easements and lands, largely funded by the federal and state governments, that are mandated by state and federal programs to be permanently preserved from urbanization/developments.

2. The Ag Land Trust believes and hereby asserts that the DEIR is required by CEQA and NEPA to reflect, as the "baseline" prior to preparation of the DEIR, the existing permanent agricultural preservation easements and fee ownership (reflected on the attached map) held by the Ag Land Trust within and immediately adjacent to any and all proposed changes or modifications to the Plan designations and to any and all expansions of developments, roads, or utilities that could irreparably damage or adversely impact the prime farmland that has been previously identified and protected by actions of the Monterey County LAFCO. We ask that each and all of our easements be fully protected for the permanent agricultural productivity and open space that was intended when they were acquired. Roads across our permanent easements that are intended for the benefit of other private developers/developments would constitute the wrongful taking of our property rights and potential conspiracy to effect inverse condemnation actions for the benefit of other private parties.

3. Ag Land Trust believes that its existing agricultural conservation easements that are/were adopted and mandated permanent mitigation measures that have resulted from prior conversions of prime farmland by the City, and which were previously mandated pursuant to CEQA by Monterey County LAFCO, and also permanently mandated by continuing and legally binding settlement agreements between the County of Monterey and the City of Salinas and LAFCO, may be significantly and adversely impacted by draft proposals in the proposed Economic Development Element. The potential unmitigated loss of prime and productive farmland that the City, the County, and LAFCO have previously recognized (as being of national importance) and affirmatively acted to permanently protect through the use of conservation

easements, is very, very great. Further, it appears that some of the City's proposals in the plan will result in or are intended to "undo" the previously mandated mitigation measures and prior governmental acts that have been mutually taken to permanently preserve the prime and productive farmlands on the south and west sides of the City.

4. The DEIR must establish and fully recognize the existing and binding contractual land use limitations/prohibitions upon the conversion of prime farmlands to which the City is contractually obligated. Any proposed changes to those existing contractual obligations related to previously protected prime farmland will necessitate a new and fully disclosed DEIR process, separate from the current process, because such changes have not been fully disclosed to the public. The existing contractual agreements between the City and the County and LAFCO, and the binding mitigation conditions to which the City has previously agreed and committed, must be fully and completely disclosed and made a part of the DEIR so as to prohibit "back-sliding" on mandated mitigation commitments to the permanent protection and preservation of prime and productive farmlands in the Salinas Valley.

Thank you for allowing the Ag Land Trust to comment on the NOP.

<comments to Salinas re NOP.pdf>

November 30, 2015

Tara Hullinger, Planning Manager
Community Development Department
City of Salinas
65 West Alisal Street
Salinas, California 93901



Email: tarah@ci.salinas.ca.us

SUBJECT: Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (EIR) for the proposed City of Salinas Economic Development Element

Dear Ms. Hullinger:

LandWatch Monterey County has the following comments regarding the referenced document:

1. Alternatives. The DEIR should address the following alternatives:

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B. Adoption of policies to encourage in-fill and revitalization to minimize or avoid impacts associated with sprawl such as loss of agricultural land and increased VMT. CAPCOA's guidance for minimizing GHG emissions through compact development measures should be considered, e.g., the transportation measures in section 3.1, 3.2, 3.3, 3.5, and 3.6 of CAPCOA's Quantifying Greenhouse Gas Mitigation Measures (201 – see <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>)

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A. A summary table identifying the amount of vacant land and its land use designation within the City boundaries and existing Sphere of Influence. The DEIR should also identify the amount of acreage by area proposed for annexation.

B. Identification of existing vacant buildings within downtown and central city areas. Additionally, it should identify approved and unconstructed commercial and industrial projects such as the Uni-Kool Ag Industrial Center.

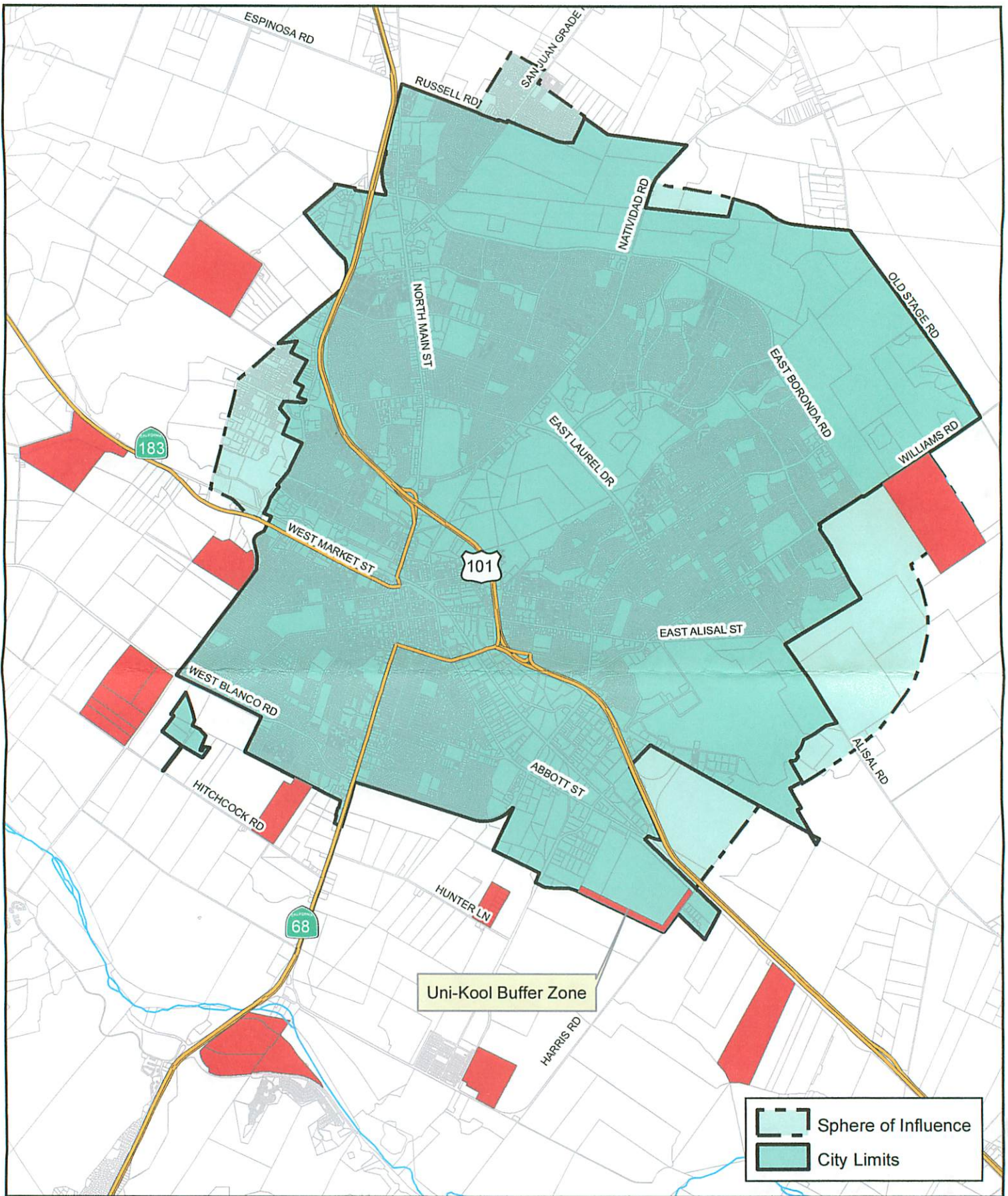
C. Identification of properties included in the plan for which the Ag Land Trust already maintains easements.

3. The DEIR should include a cumulative water supply impact analysis that does not assume, without evidence, that there is no impact from replacing agricultural land with urban uses as long as the on-site water use declines. It should not be assumed that the water impact analysis can be confined to the on-site effects of replacing agricultural land with urban uses. Trend analysis of

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The DEIR should also assess the cumulative impacts on habitat from expansion of the urban boundaries that may result in conversion of habitat land at the margins of the Valley in order to replace agricultural land lost to urbanization.

Thank you for the opportunity to comment on the NOP.



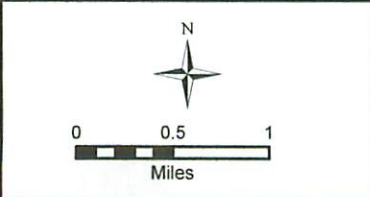
Uni-Kool Buffer Zone

	Sphere of Influence
	City Limits

LAFCO of Monterey County
 LOCAL AGENCY FORMATION COMMISSION

P.O. Box 1369
 Salinas, CA 93902
 Telephone (831) 754-5838

132 W. Gabilan St., Suite 102
 Salinas, CA 93901
 FAX (831) 754-5831



CITIES

SALINAS

Last LAFCO-Approved Change: 03/29/2010
 Sphere of Influence Affirmed: 09/27/2010
 Map Prepared: 06/21/2012

June 2, 2014

Alan Stumpf
Assistant Director
City of Salinas

SUBJECT: DRAFT GENERAL PLAN ECONOMIC DEVELOPMENT ELEMENT

Dear Mr. Stumpf:

LandWatch Monterey County reviewed the City of Salinas' proposed draft Economic Development Element, and we have the following comments:

- 1. Summary Table:** The element should include a summary table identifying the amount of vacant land and its land use designation within the City boundaries and existing Sphere of Influence. It should also identify the amount of acreage by area proposed for annexation.
- 2. Alternative to Annexation:** Lack of available land for commercial and industrial development is identified as a major constraint to economic growth throughout the document. The element should address a general plan amendment that would redesignate the 3,400 acres currently designated for residential development that have remain largely vacant for the past 12 years.
- 3. Existing Areas Designated for Commercial/Retail/Mixed Use:** The existing area within the City is designated for 3,992 million square feet of commercial/retail/mixed use and public and semi-public uses. Please explain why more is needed when so much existing space is available.
- 4. Policies to Encourage Infill and Revitalization of Existing Commercial and Industrial Areas:** It is generally accepted that new commercial development on the boundaries of a local jurisdiction discourages infill. The element should include policies that require development within existing commercial and industrial areas prior to expanding to the areas adjacent to the City. Recent opposition to County's proposed Capitol One building purchase shows there is a general desire of the community for city-centered growth. Local business leaders including the Salinas Valley Chamber, the Oldtown Salinas Association, and the Salinas United Business Association are opposing the county's proposal topurchase the old Capitol One building on the outskirts of the city limits because it violates efforts to revitalize downtown.
- 5. Vacant Buildings and Approved and Unconstructed Projects:** The element should identify existing vacant buildings within downtown and central city areas. Additionally, it should identify approved and unconstructed commercial and industrial projects such as the Uni- Kool Ag Industrial Center.
- 6. Existing Agricultural Land Easements:** The draft plan should address properties included in the plan for which the Ag Land Trust already maintains easements.

Thank you for the opportunity to review the document.

June 2, 2014

Alan Stumpf
Assistant Director
City of Salinas

SUBJECT: DRAFT GENERAL PLAN ECONOMIC DEVELOPMENT ELEMENT

Dear Mr. Stumpf,

LandWatch Monterey County reviewed the City of Salinas' proposed draft Economic Development Element, and we have the following comments:

1. Summary Table: The element should include a summary table identifying the amount of vacant land and its land use designation within the City boundaries and existing Sphere of Influence. It should also identify the amount of acreage by area proposed for annexation.
2. Alternative to Annexation: Lack of available land for commercial and industrial development is identified as a major constraint to economic growth throughout the document. The element should address a general plan amendment that would re-designate the 2,400 acres currently designated for residential development that have remain largely vacant for the past 12 years.
3. Existing Area Designated for Commercial/Residential Mixed Use: The existing area within the City is designated for 3,992 million square feet of commercial/residential mixed use and public and semi-public use. Please explain why more is needed when so much existing space is available.
4. Policies to Encourage Infill and Revitalization of Existing Commercial and Industrial Areas: It is generally accepted that new commercial development on the boundaries of a local jurisdiction discourages infill. The element should include policies that require development within existing commercial and industrial areas prior to expanding to the areas adjacent to the City. Recent opposition to County's proposed Capital One building purchase shows there is a general desire of the community for city-centered growth. Local business leaders including the Salinas Valley Chamber, the Oldown Salinas Association, and the Salinas United Business Association are opposing the county's proposal to purchase the old Capital One building on the outskirts of the city limits because it violates efforts to revitalize downtown.
5. Vacant Buildings and Unconstructed Projects: The element should identify existing vacant buildings within downtown and central city areas. Additionally, it should identify approved and unconstructed commercial and industrial projects such as the Uni-Kool Ag Industrial Center.
6. Existing Agricultural Land Elements: The draft plan should address properties included in the plan for which the Ag Land Trust already maintains easements.

Thank you for the opportunity to review the document.



Building Healthy Communities – East Salinas

December 7, 2015

TO: City of Salinas Community Development Department
FROM: Building Healthy Communities – East Salinas Land Use Action Team

RE: Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (EIR) for the Proposed City of Salinas Economic Development Element

Building Healthy Communities – East Salinas (BHC) is a collaborative of organizations, public agencies, and residents working to improve health outcomes in East Salinas. BHC was an early adherent of the City of Salinas Economic Development Element (EDE) planning process. In 2013, we convened an Economic Development (ED) Workgroup consisting of BHC partners to identify and advocate equitable and health promoting economic development practices. The BHC ED Workgroup has since invested considerable time conducting outreach and education activities to engage residents and other community stakeholders in this process. BHC is engaged in this effort because we recognize that workforce development, quality jobs, entrepreneurship, and an environment that attracts businesses while supporting healthy lifestyles for residents are all fundamental to a healthy East Salinas.

Introduction

Income is one of the strongest predictors of health outcomes worldwide. Health care access, health outcomes and life expectancy improve as income increases. When households earn incomes much lower than the average cost of living, they tend to make sacrifices in other important areas. Those lifestyle compromises can include eating less food and/or more unhealthy food, living in substandard housing, and/or delaying medical care. Additionally, lacking resources to meet basic needs causes long-term stress, which makes the body less resistant to other health risks.¹ Like race, average-household income is strongly correlated with neighborhood condition.² We believe that if implemented correctly, with community engagement, the EDE has the potential to increase the average household incomes of families living in the Alisal, thus lifting the burden off of the public and nonprofit safety net in Monterey County.

BHC is committed to the success and integrity of this Element. The ED Workgroup continues to engage with City of Salinas Economic Development staff on implementation of EDE policy. BHC also actively supports the City of Salinas in other efforts to promote active transportation, revitalization of existing

¹ Marmot, M. (2002, March/April). The Influence of Income on Health: Views of an Epidemiologist. *Health Affairs*, 21(2), pp. 31-46. URL: https://sph.uth.edu/course/occupational_envHealth/bamick/RICE%20-%20Views%20of%20an%20Epidemiologist

² Robert Wood Johnson Foundation (May 2011). Exploring the Social Determinants of Health Series. Issue Brief #8: Neighborhoods and Transportation (May 2011). Exploring the Social Determinants of Health Series Issue Brief #8: <http://www.rwjf.org/en/about-us/2011/05/11/exploring-the-social-determinants-of-health-series-issue-brief-8.html>



Building Healthy Communities - East Salinas

neighborhoods, and improved park access. We acknowledge that the Draft EDE contains some policies that run counter to the type of sustainable and city-centered land uses that we have typically supported. We commend the City Council's January 5, 2015 motion to prioritize infill development in the EDE and encourage the City to go further by addressing some of the potentially detrimental environmental impacts of the Draft EDE.

Recommendations

In accordance with CEQA Guidelines section 15126.6, the EIR must include an analysis of reasonable alternatives to the proposed project. We are proposing two alternatives aimed at reducing impacts on air quality, on greenhouse gas emissions, and on transportation.

Recommended Alternative: Eliminate the Proposed Expressways

At a time when we are supposed to be reducing our dependence on single occupancy vehicles, we believe that the EDE's proposed expressways (creating a beltway around the City) are unnecessary and counter to academic research, state mandates, and community priorities. The California Department of Transportation's (Caltrans') Mission, Vision, Goals, and Values web page lists the following five goals³. Below we have listed each of the goals in blue and the bullet points discuss the proposed expressways are at odds with that state goal, community priorities, and the research supporting these arguments.

1. **Safety and Health:** Provide a safe transportation system for workers and users, and promote health through active transportation and reduced pollution in communities.
 - Goal 1 discusses active transportation and reduced pollution in communities. Adding new expressways would be counter to both of those aspects of this goal. Highways have serious health impacts that include noise and air pollution, road dust from tire wear, as well as increased risk for serious injury and death from collisions because of the faster speeds.
 - *"Air pollutants from cars, trucks and other motor vehicles are found in higher concentrations near major roads. People who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic including higher rates of asthma onset and aggravation, cardiovascular disease, impaired lung development in children, pre-term and low-birthweight infants, childhood leukemia, and premature death."*⁴

³ California Department of Transportation. "Mission, Vision, Goals, and Values". URL: <http://www.dot.ca.gov/hq/paffairs/about/mission.htm>

⁴ U.S. Environmental Protection Agency. "Near Roadway Air Pollution and Health" URL: <http://www3.epa.gov/otaq/nearroadway.htm>



Building Healthy Communities - East Salinas

2. **Stewardship and Efficiency: Money counts.** Responsibly manage California's transportation-related assets.

- Expressways are very costly to construct and maintain. Goal 2 seeks to be responsible with California's limited financial resources. How could circulation, the economy, and quality of life improve if the money to construct these new expressways were invested in improving our public transportation system and pedestrian and bicycle facilities?⁵
- Transportation Cost and Benefit Analysis II – Roadway Costs from the Victoria Transport Policy Institute provides a helpful analysis of roadway construction costs. In discussing equity and efficiency issues, the publication states:

“Roadway costs are partly internalized through special user fees, but there are often additional external costs. In the U.S. and Canada, most major highway costs can be considered internalized through user fees, but most local roadway costs can be considered external. Nondrivers tend to subsidize drivers through local road budgets. To the degree that road user fees do not accurately reflect the roadway costs imposed by individual vehicles, they can be considered inequitable and inefficient.”

3. **Sustainability, Livability and Economy: Make long-lasting, smart mobility decisions that improve the environment, support a vibrant economy, and build communities, not sprawl.**

- There is ample research showing the connection between the environmental impacts of highways (increased air pollutants from additional vehicle miles traveled and loss of agricultural and natural lands) and the negative impact a new highway can have vibrancy and quality of life in a community (noise and air pollution, displacement, barriers to pedestrian access).
- Additionally, Caltrans recently admitted that more/new roads creates “induced demand”. Induced demand means that the creation of X% of new roadway capacity brings a similar increased % of traffic.¹ In the UC Davis policy brief “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion”⁶, Professor Susan Handy shares the following research findings:
 - *The quality of the evidence linking highway capacity expansion to increased VMT (vehicle miles traveled) is high*

⁵ Public Transport Users Association. “Myth: Freeways Are Cheap, and Public Transport Expensive”. URL: <http://www.ptua.org.au/myths/capcost/>

⁶ Handy, Susan. National Center for Sustainable Transportation. “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion” URL: http://www.dot.ca.gov/research/docs/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf



Building Healthy Communities - East Salinas

- Increased roadway capacity induces additional VMT in the short-run and even more VMT in the long-run
- Capacity expansion leads to a net increase in VMT, not simply a shifting of VMT from one road to another
- Increases in GHG emissions attributable to capacity expansion are substantial
- Capacity expansion does not increase employment or other economic activity
- Conversely, reductions in roadway capacity tend to produce social and economic benefits without worsening traffic congestion

4. **System Performance:** Utilize leadership, collaboration and strategic partnerships to develop an integrated transportation system that provides reliable and accessible mobility for travelers.
 - The Transportation Agency for Monterey County would have to be a partner in creating these new expressways. At this time, their Regional Transportation Improvement Program does not support the development of new expressways in Salinas.⁷
5. **Organizational Excellence:** Be a national leader in delivering quality service through excellent employee performance, public communication, and accountability.
 - This goal is not relevant to expressway creation.

Recommended Alternative: Require a higher minimum floor-area-ratio (FAR) for retail land uses

Floor Area Ratio is a measure of development intensity that compares the ratio of total building floor area to the total land area of a lot. For example, a one-story building that covers its entire lot would have a FAR of 1.0. The Draft EDE assumes that all target Economic Opportunity Area (EOA) retail will be developed with the City of Salinas General Plan Citywide FAR standard of 0.25. A FAR of 0.25 implies that a one-story development would only cover one fourth of its lot, potentially encouraging the development of parking on the remaining three-fourths of the lot.

A higher FAR standard will still allow the City to meet its projected Retail Building Demand, but with a smaller physical footprint. The City of Salinas General Plan provides a reasonable alternative in the Central City FAR standard of 1.5 to 3.0. Even if this FAR were applied only to the proposed 810,448 square feet of new building space in EOA V: Carr Lake, the amount of acreage needed would reduce from 74 acres to 12.4 acres, reserving significantly more acreage for parkland. Moreover, the City of Salinas has average park level of service (LOS) of 2.0 acres of parkland/1,000 residents counter the 5.0

⁷ Transportation Agency for Monterey County. "2014 Regional Transportation Improvement Program". URL: <http://www.tamcmonterey.org/programs/fund/PDF/2014-RTIP.pdf>



Building Healthy Communities – East Salinas

acres/1,000 residents recommended by the American Planning Association. Development of Carr Lake into a centerpiece park and recreational hub for the City has been an early EDE priority of BHC.

The application of a higher FAR standard to proposed EOA retail development would have multiple benefits by encouraging higher development intensity. Compact retail discourages vehicle trips by placing destinations closer together, which makes alternative transportation modes more economically feasible and attractive to users. Compact retail also encourages healthier lifestyles by encourage residents to walk or bike to retail destinations and by avoiding air quality impacts through increased vehicle use. Emerging research also shows positive correlations between compact development patterns and reductions in greenhouse gas emissions. A 2010 report by the Urban Land Institute called Land Use and Driving: The Role Compact Development Can Play in Reducing Greenhouse Gas Emissions reviewed three recent studies, which used varying methodologies to evaluate the impact of compact development on greenhouse gases. The report concluded that as compact development comprises a larger share of future development, communities could expect to see greater drops in vehicle miles traveled and greenhouse gas emissions.

The Draft Economic Development Element includes many policies supportive of New Urbanism, active transportation, and revitalization of existing neighborhoods, all of which are fundamental to a more sustainable and economically viable future for Salinas and in alignment with the state's SB 375 requirements. The City should require higher development intensity through a higher FAR in order to maintain consistency with the Elements sustainable development policies and to avoid potentially detrimental environmental impacts related to transportation, air quality, and greenhouse gas emissions.

Conclusion

BHC appreciates this opportunity to comment on the Notice of Preparation of the Draft Economic Development Element EIR and look forward to continued engagement with the City of Salinas on completion of the environmental review process and successful implementation of this Element.

Sincerely,

Jeanette Pantoja, Land Use Project Coordinator
Beth Altshuler, Urban Planning and Public Health Specialist
Building Healthy Communities – East Salinas

ⁱ Induced Demand. Wikipedia. URL: https://en.wikipedia.org/wiki/Induced_demand

LAFCO *of Monterey County*

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KATE McKENNA, AICP
Executive Officer

DATE: December 7, 2015
TO: Chair and Members of the Formation Commission
FROM: Kate McKenna, AICP, Executive Officer
SUBJECT: COMMENT LETTER – CITY OF SALINAS: NOTICE OF PREPARATION
OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (EIR)
FOR A PROPOSED ECONOMIC DEVELOPMENT GENERAL PLAN
ELEMENT

SUMMARY OF RECOMMENDATION:

It is recommended that the Commission authorize the Executive Officer to send a comment letter (Attachment 1) to the City of Salinas regarding the City's Notice of Preparation of a Draft EIR.

EXECUTIVE OFFICER'S REPORT:

Proposed Draft Economic Development Element

On November 6, the City of Salinas circulated a Notice of Preparation of a Draft Program EIR for a proposed Economic Development Element (EDE). The Notice is provided as Attachment 2. The Draft EIR is being prepared and is not yet available for public review and comment.

If approved by the Salinas City Council, the EDE, currently in draft form, will eventually become a component of the City's General Plan. As summarized in the City's notice, "The purpose of the draft [EDE] is to guide future decisions of the City Council and the community in all aspects of City policy related to economic development. The City's primary interest is to raise economic development priorities to a legislative, General Plan policy level, and by doing so, ensure that economic development is considered in all City Council planning and decision making actions."

The draft EDE identifies 25 areas for potential future development, totaling 14,728 acres (23 square miles). These areas are mapped on Figure 3 (page 9) and summarized in Table 1 (page 11) of the EDE. Proposed land uses are shown on Figure 4 (page 13) and potential building capacities are discussed in text and table form. As shown on EDE page 11, ten of these areas are on unincorporated County lands outside current city limits, and six of these areas are also outside the city's currently designated Sphere of Influence. LAFCO's current map for the city is provided as Attachment 3.

Areas of the EDE that are currently unincorporated are about 9,491 acres (14.8 square miles), comprising 64% of the EDE's total acreage. Of these 14.8 square miles of unincorporated areas, 75% (7,147 acres, or 11.2 square miles) is also outside the City's existing designated Sphere of Influence.

Development of currently unincorporated areas would be subject to LAFCO's approval of future Sphere amendments and annexation proposals at a future date. Such development would likely also require revisions to the existing City-County Memorandum of Understanding, briefly described below. Increased economic development efforts or other development of areas already within existing city limits would require no LAFCO involvement.

Related Prior Actions

In 2006, the County of Monterey and the City of Salinas entered into the Greater Salinas Memorandum of Understanding (MOU) to ensure orderly future development of lands outside existing city limits. The approved MOU set forth that:

“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 and the City.”

The MOU provided the basis for amendments to the City’s Sphere of Influence, approved by LAFCO in 2008, as reflected on the current LAFCO map.

In 2008, in accordance with the MOU, LAFCO also approved a 2,388-acre (3.75-square-mile) annexation along the northern edge of Salinas (“Future Growth Area,” represented by areas H and I on Figure 3, page 9 of the draft EDE). In 2010, LAFCO approved a 252-acre Sphere amendment and annexation (“Uni-Kool site,” represented by area A on Figure 3, page 9 of the draft EDE). These areas currently remain undeveloped. LAFCO most recently affirmed the City’s existing designated Sphere of Influence in January 2011, as part of a comprehensive periodic review of all cities countywide.

At the April 2014 LAFCO meeting, the City’s EDE project manager Doug Yount made an informal presentation about then-current status of the EDE. In October 2015, the City circulated an environmental initial study and a notice of preparation of a specific plan for western portions of the Future Growth Area, which is within existing city limits.

LAFCO’s Draft Comment Letter on the EDE Notice of Preparation

As discussed above, many of the EDE’s development sites are outside the City’s current city limits and Sphere of Influence and would therefore be subject to future LAFCO approvals in order for development to occur. California Environmental Quality Act (CEQA) clearance for future Sphere amendment and annexation proposals will rely upon either the draft EIR currently being prepared or a subsequent environmental document, potentially “tiered” from the current EIR. It will therefore be necessary for the current, or a subsequent, CEQA document to include a detailed analysis of the project’s conformance to applicable LAFCO-related state legal requirements and LAFCO’s locally adopted policies.

The attached draft comment letter to the City of Salinas requests that the draft EIR include an analysis of the EDE’s conformance to LAFCO-related State laws and locally adopted policies, to the extent such analysis is possible based on information currently available about potential long-term future development of currently unincorporated sites.

A more detailed, site-specific, and updated analysis to LAFCO laws and policies should also be anticipated as a required part of subsequent, project-level CEQA documents when future proposals are brought forward to LAFCO. Provision of this information in current and future CEQA documents will help ensure that the Commission will have adequate information to act in its role as a CEQA Responsible Agency, when future Sphere amendments or annexation proposals for areas within the EDE are submitted to LAFCO.

The letter also requests that the draft EIR include an analysis of the EDE’s conformance to the Greater Salinas MOU.

ALTERNATIVE ACTIONS:

The Commission may modify, delete, or add to the draft comment letter.

Respectfully Submitted,



Kate McKenna, AICP
Executive Officer

Attachments:

1. Draft comment letter to the City of Salinas
2. City of Salinas's Notice of Preparation
3. Map of current city limits and Sphere of Influence

CC:

Tara Hullinger, Planning Manager, City of Salinas
Doug Yount, EDE Project Manager, City of Salinas

Prepared by: Darren McBain, Senior Analyst

LAFCO *of Monterey County*

LOCAL AGENCY FORMATION COMMISSION OF MONTEREY COUNTY

2015

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Graig R. Stephens
Special District Member

Counsel

Leslie J. Girard
General Counsel

Staff

Kate McKenna, AICP
Executive Officer

132 W. Gabilan Street, #102
Salinas, CA 93901

P. O. Box 1369
Salinas, CA 93902

Voice: 831-754-5838
Fax: 831-754-5831

December 7, 2015

Tara Hullinger, Planning Manager
Community Development Department
City of Salinas
65 West Alisal Street
Salinas, California 93901

**RE: Notice of Preparation of a Draft Program Environmental Impact Report (EIR)
for the Proposed City of Salinas Economic Development Element**

Dear Ms. Hullinger:

Thank you for this opportunity to comment on the Notice of Preparation of a draft EIR for a draft Economic Development Element (EDE) to be added to the City's General Plan. The draft EDE envisions future development on approximately 23 square miles of lands. About 14.8 square miles of these lands are outside current city limits. About 75% of this currently unincorporated area is also outside the City's existing Sphere of Influence, as designated by the Local Agency Formation Commission of Monterey County (LAFCO). Development of currently unincorporated areas would be subject to LAFCO's approval of future Sphere amendments and annexation proposals at a future date.

Under the California Environmental Quality Act (CEQA), LAFCO is a Responsible Agency for this proposal, and will have regulatory authority for future applications for the proposed annexation application. It is in this role that LAFCO is commenting on the EIR.

Comments on Scope of the Draft EIR:

**I. Conformance to State LAFCO Law and Locally Adopted LAFCO Policies
(Please provide an analysis in the draft EIR).**

LAFCO's statutory authority is derived from the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code section 56000, et seq.). Among LAFCO's purposes are: Discouraging urban sprawl, preserving open space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation and development of local agencies based upon local conditions and circumstances (section 56301). The Cortese-Knox-Hertzberg Act identifies factors that must be considered, and determinations that must be made, as part of LAFCO's review of annexation proposals.

These provisions of law are the legislative basis for LAFCO's locally adopted Policies and Procedures Relating to Spheres of Influence and Changes of Organization and Reorganization ("LAFCO Policies"), most recently updated February 25, 2013, which guide LAFCO's review and consideration of requests for annexation and other boundary changes. The full text of LAFCO's adopted Policies is available on LAFCO's web site: <http://www.monterey.lafco.ca.gov/>

If the EDE is approved, LAFCO will likely be requested, at a future date, to consider approval of one or more Sphere of Influence and annexation proposals for currently unincorporated sites in the EDE, in accordance with the Cortese-Knox-Hertzberg

Act and local LAFCO policies. As a CEQA Responsible Agency, LAFCO plans to use the City's environmental document to fulfill CEQA clearance for the annexation, and to support the evaluation of the proposal's consistency with the applicable LAFCO laws and policies, including adopted "Preservation of Open-Space and Agricultural Lands" and "Housing and Jobs" policies, among others.

The City's Notice of Preparation recognizes that "Projects proposed within [economic opportunity areas] and economic opportunity reserve areas must also be evaluated for their consistency with Monterey County Local Agency Formation Commission SOI and annexation policies, including policies related to the logical expansion of urban boundaries and logical expansion of urban services and utilities" (page 23).

LAFCO requests that the draft EIR currently being prepared include an analysis of the EDE's conformance to the full range of LAFCO's adopted policies and related State laws, to the extent such analysis is possible based on information currently available about potential long-term future development of currently unincorporated sites. LAFCO staff can provide examples of similar analyses from other recent proposals.

A more detailed, site-specific, and updated analysis to LAFCO laws and policies should also be anticipated as a required part of subsequent, project-level CEQA documents when future proposals are brought forward to LAFCO. Provision of this information in current and future CEQA documents will help ensure that the Commission will have adequate information to act in its role as a CEQA Responsible Agency, when future Sphere amendments or annexation proposals for areas within the EDE are submitted to LAFCO.

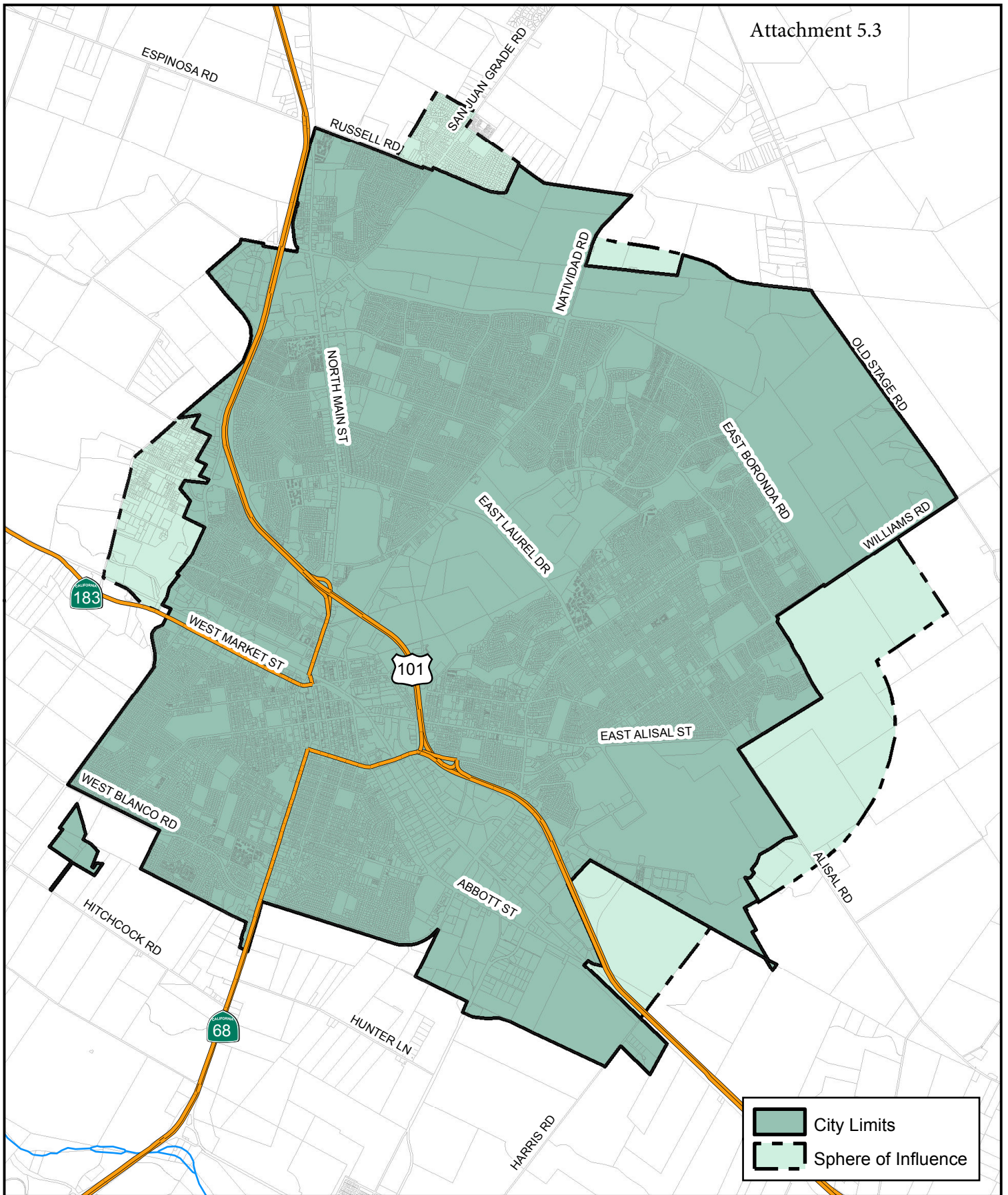
2. Conformance to the Adopted 2006 Greater Salinas Area Memorandum of Understanding (MOU)
(Please address the EDE's consistency with the MOU).

Please include in the draft EIR an analysis of the EDE's consistency with the adopted 2006 City-County MOU, which does not appear to be discussed in the Notice of Preparation. Implementation of the EDE may require revisions to the adopted MOU. Because such revisions would likely involve the potential for future Sphere of Influence and annexation proposals, and would directly pertain to LAFCO's legislative purposes, LAFCO would like to have a role in any future modifications to the adopted MOU.

Thank you again for this opportunity to comment on this proposal. Please continue to keep us informed throughout your process. I would be happy to meet with you and your consultants for more detailed discussions.

Sincerely,

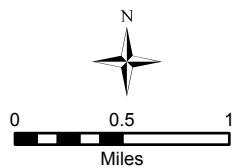
Kate McKenna, AICP
Executive Officer



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CITIES

SALINAS

Last LAFCO-Approved Change: 03/29/2010
 Sphere of Influence Affirmed: 09/27/2010
 Map Prepared: 06/21/2012

MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY

Carl P. Holm, AICP, Director
John Guertin, Acting Deputy Director

Daniel Dobrilovic, Acting Building Official
Michael Novo, AICP, Director of Planning
Robert K. Murdoch, P.E., Director of Public Works



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<http://www.co.monterey.ca.us/rma>

December 11, 2015

City of Salinas Community Development Department
c/o Tara Hullinger, Planning Manager,
65 West Alisal Street
Salinas, California, 93901.

Subject: Notice of Preparation for Draft EIR – Economic Development Element

Dear Ms. Hullinger:

Thank you for the opportunity to comment on the Notice of Preparation for a Draft Environmental Impact Report (EIR) related to the City's proposed Economic Development Element. We earlier provided a letter to the City, in July of 2014, providing comments on the proposed element. We have attached that letter. We offer the following comments on matters we would like the City to analyze in the Draft EIR. Please provide notice to the County of Monterey for all steps of the EIR and hearing process, including obtaining a copy of the Draft EIR so that we can review and provide comments to the City.

The EIR needs to analyze the impacts to county facilities, including road infrastructure, and propose mitigation measures (including analyzing the impact of those mitigation measures). Please work with County RMA-Public Works staff to identify the appropriate road segments and intersections that should be analyzed in the EIR. The Alternatives analysis should provide a comparison of road impacts and mitigation measures for the different alternatives.

The City and County have a Memorandum of Understanding, known as the Greater Salinas Area Memorandum of Understanding (MOU), which was amended in 2006 (City of Salinas Resolution No. 19059). That MOU, in part, was established to ensure orderly future development of lands outside existing city limits. Examples of what the approved MOU set forth include:

“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 and the City.”

“City and County agree that 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. 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."

As we explained in our attached July 14, 2014 letter, the proposal is not consistent with the terms of this MOU. Those inconsistencies need to be analyzed in the EIR related to direct and indirect potential physical impacts on the environment.

The project EIR must provide a detailed analysis of the loss of prime farmland, cancellation of any associated Williamson Act contracts to accommodate City expansion, and the impacts to surrounding farmland with the potential expansion of the City adjacent to prime farmland. Buffers, in the form of graduated zoning and physical buffers, must be considered for any such areas. Furthermore, agricultural conservation easements exist in portions of the "opportunity areas" in the southern part of the city boundary. These easements are in perpetuity and impacts to the long term viability of those properties must be analyzed. Infrastructure or other development is not typically allowed in these easements, so any impacts from infrastructure should also be analyzed.

The MOU provided the basis for amendments to the City's Sphere of Influence, approved by LAFCO in 2008, as reflected on the current LAFCO map. Development of currently unincorporated areas would be subject to LAFCO's approval of future Sphere amendments and annexation proposals. Such development would likely also require revisions to the existing City-County Memorandum of Understanding. County policies also advocate for urban growth that does not encourage or create sprawl, is orderly and compact, and preserves open space and prime farmland. A thorough review and analysis of Monterey County General Plan policies, which also require protection of agricultural land, should be included for all alternatives.

We would encourage the City to analyze a project alternative, as one of the "reasonable range of alternatives," that is consistent with the MOU and that would assist in reducing Greenhouse Gas emissions. We would be happy to discuss how such an alternative could be shaped to minimize county concerns related to potential impacts on the environment and to our goals and policies.

Thank you for your consideration of this information. If you have any questions please do not hesitate to contact me at novom@co.monterey.ca.us or by phone at (831) 755-5192.

Sincerely,



Mike Novo
Director of Planning

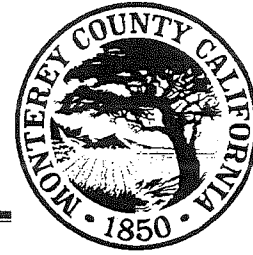
Attachment: July 14, 2014 letter from County

cc: Board of Supervisors
Agricultural Commissioner Eric Lauritzen
RMA Director Carl Holm

MONTEREY COUNTY

RESOURCE MANAGEMENT AGENCY

Benny J. Young, Director
Carl P. Holm, AICP, Deputy Director



Michael A. Rodriguez, C.B.O., Chief Building Official
Michael Novo, AICP, Director of Planning
Robert K. Murdoch, P.E., Director of Public Works

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<http://www.co.monterey.ca.us/rma>

July 14, 2014

Mr. Doug Yount
City of Salinas
65 W. Alisal Street, Suite 201
Salinas, CA 93901

Subject: Draft Economic Development Element of the City of Salinas General Plan

Dear Mr. Yount,

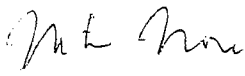
Thank you for the opportunity to comment on the Draft Economic Development Element of the General Plan. *Policy ED-LU-1.7.1* is intended to increase the supply of land outside the existing city limits for targeted economic development by expanding the City's jurisdictional limits and Sphere of Influence. *Action LU-1.7.1* is to work with LAFCO, the County, the Agricultural Land Trust and other affected agencies and stakeholders to expand the City's Sphere of Influence and Urban Service Area, as well as annex Economic Opportunity Areas B, F, K, L and N to the City. *Action LU-1.7.3* is to work with the County to revise the Greater Salinas Area Memorandum of Understanding (MOU) and other related agreements such as tax transfer agreements, to address development on these Economic Opportunity Areas that are located outside the City's Sphere of Influence.

We agree with the statement in Action LU1.7.3 that annexing Economic Opportunity Areas B, F, K, L and N will require revisions to the MOU. The MOU states that its objectives are the preservation of certain agricultural land, the provision of future growth areas and the provision of adequate financing for the services and facilities to benefit local residents. It further states that the 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 in the MOU (i.e., the Unikool and Fresh Express properties). Annexation of Economic Opportunity Areas B, F, K, L and N is a significant departure from these objectives and provisions of the MOU and County support of City expansion in these areas is uncertain.

In addition, Areas B, F, K, L and N are designated as Farmland in the Greater Salinas Area Plan. Annexation and conversion of these areas to urban uses could have significant impacts to Williamson Act lands, conversion of agricultural land, water use and traffic. These impacts would need to be addressed in an EIR and adequate mitigation would need to be proposed.

Feel free to contact me at (831) 755-5192 or at novom@co.monterey.ca.us if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Novo".

Mike Novo, AICP
Director of RMA-Planning