MONTEREY COUNTY
RESOURCE MANAGEMENT AGENCY
Carl P. Holm, AICP, Director

LAND USE & COMMUNITY DEVELOPMENT | PUBLIC WORKS & FACILITIES | PARKS
1441 Schilling Place, South 2nd Floor (831)755-4800
Salinas, California 93901-4527 www.co.monterey.ca.us/rma

October 19, 2017

Emailed & Hand Delivered

Lisa Brinton, Senior Planner
Community Development Department
CITY OF SALINAS
65 West Alisal Street
Salinas, California 93901

RE: Draft Program Economic Development Element Environment Impact Report (EIR) for the proposed City of Salinas – Economic Development Element of the General Plan

Dear Ms. Brinton :

Thank you for the opportunity to comment on the Draft Programmatic EIR for the Draft Economic Development Element of the Salinas General Plan. On August 29, 2006, after extensive negotiations, the City of Salinas and Monterey County approved a Memorandum of Understanding (MOU) regarding land use expansion for the Greater Salinas Area (GSA). This MOU identifies future growth areas and addresses mitigation for loss of agricultural land as well as financing for services and facilities (e.g. traffic fees). The intent of this MOU, at least from the County's perspective, is to protect certain agricultural lands from development pressures. The highest priority (concern) was to stop growth south of Blanco Road and west of the Westside bypass (conceptual alignment identified in City and County General Plans).

County staff finds that the Economic Development Element of the General Plan extends/proposes land uses beyond the agreed lands within the GSA MOU. City and County staff have discussed options to help frame the range of alternatives for evaluation in the DEIR. However, the City cannot adopt an alternative that conflicts with the GSA MOU because amending the GSA MOU is uncertain at this point. In accordance with the 2006 MOU, the county has diligently worked to preserve agricultural land to the west and south of the City's SOI. Over the last eleven years over 30,000 acres have been acquired under the Williamson Act and Agricultural Conservation Easements.

The EDE (project for purposes of the DEIR) identifies areas proposed as "Target" areas and "Economic Development Reserve" (EDR) south of Blanco Road. Expansion of proposed land use development into prime farmland outside the Sphere of Influence (SOI) or areas established in the GSA MOU is troublesome because it directly conflicts with the intent of the GSA MOU, especially the area south of the city limits (Blanco Road).

Because of the importance of lands having Blanco clay soils for irrigated agricultural lands, County finds that the analysis does not adequately mitigate the loss of prime Agricultural land. We concur with letters submitted by the Monterey County Agricultural Commissioner's Office and Local Agency Formation Commission (LAFCO).

County staff supports infill growth using boundaries defined by the city limits, sphere of influence, and GSA MOU. It is reasonable to consider lands between the City limit and Westside bypass as a potential infill area. In addition, the MOU has anticipated growth generally to the north of the City limits. We recommend that the City follow these criteria to provide reasonable, orderly growth and honor the agreed City growth strategy.

Sincerely,

Jacqueline R. Onciano
RMA Chief of Planning

Cc: Carl P. Holm, AICP, Director, Monterey County Resource Management Agency

LETTER #7

MONTEREY COUNTY

AGRICULTURAL COMMISSIONER/SEALER OF WEIGHTS & MEASURES
ERIC LAURITZEN, AGRICULTURAL COMMISSIONER/SEALER
1428 ABBOTT STREET - SALINAS, CALIFORNIA 93901
PHONE: (831) 759-7325 FAX: (831) 422-5003
WEBSITE: ag.co.monterey.ca.us

October 19, 2017

Lisa Brinton, Senior Planner
Community Development Department
City of Salinas
65 West Alisal Street
Salinas, CA 93901

RE: Draft Program Environmental Impact Report (EIR) for the Proposed City of Salinas Economic Development Element (EDE) of the General Plan

Dear Ms. Brinton:

Thank you for the continued opportunity to provide our comments regarding the proposed General Plan Element.

Per our previous letter to the City that addressed the agricultural impacts of the City's proposed expansion (part of the Resource Management Agency's comment letter in 2015 provided when the draft initial study was released), **we maintain the stance that the City's intent to expand into prime farmland in the proposed "Target" areas and particularly the "Economic Development Reserve" (EDR) areas outside of the existing Sphere of Influence (SOI) is not needed or warranted**. 1

These proposals are an example of unnecessary urban sprawl when there are plentiful infill options within the City boundaries, in accordance with the 3,500 acre SOI increase that was approved by LAFCO in 2008, which have not been built out. Further, the proposal violates the City's own general plan policies (LU 2.1, which reflects the terms of the MOU limiting expansion to the northeast, and COS 3.3, which discourages the conversion of agricultural land, among many others), the Memorandum of Understanding (MOU) that was signed by LAFCO, the County, and the City in 2006, numerous LAFCO State mandates, as well as several other applicable policies. We had specifically requested the following analysis be contained in our prior letter: 2 3

> *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. However, clearly the first choice will be to simply remove these areas from any further consideration.*

However, the analysis contained in the current EIR is entirely inadequate and does not address project impacts. Rather, the analysis and proposed policies/actions *support* the expansion of the SOI, and do not in any way mitigate project impacts, as evidenced in the following excerpt from the DEIR analysis: 4

The EDE contains policies and implementation actions which directly or indirectly address potential loss of agricultural land and *whose implementation may serve as mitigation for significant impacts. (emphasis added)* **4 Cont.**

Action LU-1.7.1: Work with LAFCO, the County of Monterey, the Monterey County 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 land areas to the City, for Economic Opportunity Areas B, F, K, L, and N.

Action LU-1.7.3: Work with the County of Monterey to revise the Greater Salinas Area Memorandum of Understanding and other related agreements such as tax transfer agreements, to address development on Economic Opportunity Areas located outside the City's Sphere of Influence as identified in the Economic Opportunity Areas map.

Action LU-1.7.4: Through a local Agricultural Land Preservation Program, require agricultural conservation easements, where feasible, to protect the most productive agricultural lands such as but not limited to those adjacent to Economic Opportunity Areas B, F and N.

Policy ED-LU-1.12: Work with landowners to fund and develop a plan for future retail commercial development and job growth, and other land uses, as appropriate, at the south end of the City in Economic Area N while protecting adjacent productive farmlands and prohibiting additional expansion of urban uses.

Action LU-1.12.2: Work with the County of Monterey to update the Greater Salinas Area Memorandum of Understanding in order to implement the direction of Policy ED-LU-1.12.

These actions and policies would only serve to facilitate the project and would not in any way mitigate impacts. The proposed expansion areas ignore the terms of the MOU and would expand the City's growth in all directions into prime farmland, some of the most productive in the County, if not the State. Upon review of LAFCO's letter dated October 18, 2017, regarding this matter, we wholly support the policy analysis, maps, and issues outlined therein and incorporate them by reference here. The MOU provided the basis for amendments to the City's Sphere of Influence as approved by LAFCO. **5**

The draft EIR addresses potential impacts solely from the designated "Target Areas," which would result in the conversion of 502 acres of Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) to non-agricultural use. However, the analysis does not include the EDR areas, shown on the maps in the DEIR and other City documents, which would convert nearly *7,000 additional acres of unincorporated prime farmland* into the City. It is our understanding that *approximately half of the City's growth is proposed outside of the adopted City limits and SOI.* The analysis in the DEIR must contain an assessment of the impacts of the entirety of what is displayed (e.g., 7,000 acres) in the project maps, not simply the 502 acres that are analyzed (443 of these acres are located on unincorporated County land). **6**

The impacts of the City's future proposed expansion into prime agricultural land cannot be addressed in a piecemeal fashion. It has been included in the EDE maps and must be fully analyzed. Further, the excessive amount of infill currently available to the City which has not yet been built out (more than 13,000 acres) must be taken into account when considering the need for the current expansion request. Cities by law are required to expand in an orderly fashion and infill must be the first consideration prior to requesting further expansion. The current proposal does not appear justified when the City has a plethora of land available for its future expansion into the foreseeable future. The timeframe for long-range planning documents typically spans 20 years, not the 35 years noted in the DEIR. **7** **8**

Additionally, the Target Areas that would convert agricultural land containing Williamson Act contracts and/or Agricultural Conservation Easements (ACEs) are particularly concerning. Again, the proposed mitigation for the project as it relates to the conversion of land protected with a Williamson Act contract and/or ACEs is inadequate and serves only to facilitate the City's expansion, not to mitigate impacts. Prohibiting incompatible development until a "contract is canceled or non-renewed," modifying expansion area boundaries to exclude Williamson Act acreage, or requiring future general plan amendments does not constitute mitigation. ACEs are designed to protect land "in perpetuity," and should not be negotiable or revisited. That is the sole purpose of overlaying land with these easements; they are designed to "run with the land." **9**

The proposed ratio of 1:1 mitigation for the loss of any agricultural land is also inadequate to address any conversion of prime agricultural land. None of the land displayed in the Target Areas or EDRs should be converted given the City's available infill, but if any areas are approved for expansion by LAFCO, the mitigation ratio should be increased to a 2:1 ratio at a minimum. Further, in-lieu fees would not mitigate the loss of irreplaceable prime farmland located in the expansion areas. These lands are an integral contributor to the number one economic driver in Monterey County, agriculture. **10**

The range of alternatives presented in the document must also include one that considers logical infill and redevelopment in the City's existing SOI and City limits, and one that considers expansion that would not encroach onto prime farmland. The alternatives presented violate the MOU and do not address the City's present potential for infill given current conditions. The MOU, as we understand it, was carefully negotiated and should be honored, not revised, especially without sufficient rationale. A thorough review and analysis of all Monterey County Agricultural Element policies must be included for all alternatives. The growth of the City must be done carefully, and this proposal would increase the potential for additional agricultural land to be affected by introducing urbanized uses and associated land use conflicts. Buffers should be built into the zoning by having transitional uses allowed in lands that abut unincorporated areas. **11** **12** **13**

Lastly, the expansion of the City needs to follow logical boundaries, such as major roadways, and not leap frog into areas that do not make planning sense. That was part of the purpose of the original MOU, to ensure that future development by the City is orderly and logical. **14**

We look forward to receiving a response regarding the points raised in this letter and will be participating as the process continues. This proposal would encourage and create sprawl, is not orderly and compact, and would convert, not preserve, open space and prime farmland.

Thank you again for the opportunity to comment and for considering the critically important issues raised in this letter.

Sincerely,

Robert Roach
Assistant Agricultural Commissioner

Christina McGinnis
Ag Resources and Policy Manager

LAFCO *of Monterey County*

LOCAL AGENCY FORMATION COMMISSION OF MONTEREY COUNTY

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

P. O. Box 1369
Salinas, CA 93902

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

www.monterey.lafco.ca.gov

October 18, 2017

Lisa Brinton, Senior Planner
Community Development Department
City of Salinas
65 West Alisal Street
Salinas, California 93901

RE: Draft Program Environmental Impact Report (EIR) for the Proposed City of Salinas Economic Development Element of the General Plan

Dear Ms. Brinton:

Thank you for this opportunity to comment on the Draft Program EIR for a Draft Economic Development Element (EDE) to be added to the City's General Plan. In order to comply with the deadline for commenting on the Draft EIR, I am providing the following comments in draft form. This letter is subject to review and authorization at the next regular meeting of the Local Agency Formation Commission on October 23.

LAFCO initially submitted a comment letter on the Notice of Preparation dated December 7, 2015. The following comments expand upon our previously identified remarks. By commenting on the proposed economic development program at this early stage of the City's planning process, it is LAFCO's respectful intention that the City may anticipate and address the issues prior to future submittal of any growth applications to LAFCO. Our comments pertaining to the Draft EIR are also intended to be of assistance in preparing a revised and expanded CEQA document at this time.

Overview

The Draft Economic Development Element of the Salinas General Plan is an initial step toward significant City growth in the future. Consisting of over 14,700 acres, the proposed growth areas would significantly expand the City's boundaries in all directions. Nearly 50 percent of the future growth would take place outside the existing City limits and adopted Sphere of Influence. Another ten percent is outside of the existing City limits but inside the adopted Sphere of Influence. Most of the proposed growth would take place on prime farmland or farmland of statewide importance. To put this proposal in context, a current development capacity of more than 13,000 acres is already available to the City, per the adopted Salinas General Plan. The current development capacity includes more than 3,500 acres added to the City's Sphere of Influence in 2008, and more than 2,600 acres annexed to the City in 2008 and 2010 – almost all of which is still unbuilt to date. In summary, the proposed Economic Development Element would add significantly to the City's current development capacity.

The proposed economic development expansion areas raise substantial concerns relating to conformance with LAFCO's legislative purposes (which include discouraging urban sprawl, preserving prime agricultural lands, encouraging the orderly growth and development of local agencies, and ensuring the efficient delivery of municipal services). The proposal also raises issues of inconsistency with various LAFCO-related State mandates and locally adopted policies for Sphere of Influence

amendments and annexations. One concern is the justification for major outward expansion when substantial development capacity is already available per City documents. The Draft Economic Development Element also appears to be inconsistent with several existing Salinas General Plan policies including those related to infill development, agricultural land preservation, etc. In addition, the proposal is inconsistent with key provisions of the adopted Greater Salinas Area Memorandum of Understanding between the City of Salinas and the County of Monterey.

LAFCO's concerns pertain not only to the proposed development reserve areas for which there is no development timeframe, but also to five of the identified six target areas proposed for development in the foreseeable future. The target areas represent the proposed first phase of economic development. Five of the proposed target areas, encompassing 443 acres, are currently in unincorporated County territory and outside the City's existing Sphere of Influence. All five are located on prime farmland or farmland of statewide importance. For example, Target Area N, south of Blanco Road, is on farmland that is among the most distinguished in the nation. Target Area B includes farmlands already in conservation easements and with a Williamson Act contract. While their acreage is a relatively small part of the 14,700+ acre proposed development reserve areas, all five target areas contribute to the high economic value of the local agricultural industry. As such, their development would also be inconsistent with LAFCO's state mandates, LAFCO's adopted local policies, various policies of the existing City General Plan, and with the adopted City/County Memorandum of Understanding.

The Draft Environmental Impact Report for the proposed EDE contains very limited LAFCO conformance-related information. It defers the identification and analysis of most LAFCO policies and mandates to the future. In its present draft form, the EIR contains inadequate information for use by LAFCO in our role as a Responsible Agency under CEQA. While LAFCO recognizes the inherently general nature of a program-level EIR, the City is nonetheless encouraged to revise the Draft EIR to address how the EDE does or does not conform 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 lands. The City should also anticipate that significant additional, more detailed, CEQA review will be necessary to support any future project-specific applications for LAFCO approval of actions related to the EDE.

LAFCO Authority

LAFCO's statutory authority to regulate local government boundaries and services is derived from the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 56000, et seq.). Among the purposes of the Local Agency Formation Commission are discouraging urban sprawl, preserving open space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation, growth and development of local agencies based upon local conditions and circumstances (Government Code Section 56301).

The Cortese-Knox-Hertzberg Act further provides that "In order to carry out its purposes and responsibilities for planning and shaping the logical and orderly development and coordination of local governmental agencies to advantageously provide for the present and future needs of the county and its communities, the [LAFCO] commission shall develop and determine the Sphere of Influence of each city and special district within the county and enact policies designed to promote the logical and orderly development of areas within the sphere" (Government Code Section 56425a). The Draft EDE provides a basis for future city decisions including local land use designations, transportation planning and funding, expansion of municipal service provisions and other public service infrastructure that are necessary to meet the anticipated long-term employment needs and support overall future development. Many of these city decisions will involve action by LAFCO.

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

Comments on Project Description

It is our understanding that the Draft EDE considered by the City of Salinas covers almost 15,000 acres (approximately 23 square miles). Over half of these lands are outside current city limits (8,652 acres; 13.5 square miles). Approximately 7,000 acres of unincorporated territory, representing 49% of the City's entire future development area, is outside the City's existing Sphere of Influence, as designated by the Local Agency Formation Commission of Monterey County (LAFCO). **Attachment A** provides a more detailed overview of the entire future development areas identified in the Draft EDE. Development of currently unincorporated areas would be subject to LAFCO's approval of future Sphere amendments and annexation proposals at a future date.

The following table summarizes the location of the future development areas identified in the Draft EDE.

Table A: Location of EDE's Proposed Future Development Areas

Future Development Areas	Acreage	%
Within Existing City Limits	6,075.44	41.3%
Within Adopted City Sphere of Influence (SOI)	1,505.74	10.2%
Outside Existing City Limits & Adopted SOI	7,146.82	48.5%
Total Acreage	**14,728.00**	**100%**

It is also our understanding that the City's initial phase of the EDE's future development involves six non-contiguous "Target Areas." Five of the six target areas, encompassing 443 acres, are currently unincorporated County territory and outside the City's existing Sphere of Influence. These target areas were derived from the Draft EDE's Economic Opportunity Areas (EOAs): lands identified by the City as potential future economic development within areas located adjacent to, but outside its existing sphere which total approximately 15,000 acres. **Map 1** depicting the EOAs and target areas in relation to the City's sphere is attached to this letter for further illustration. While the Draft EDE only focuses on development within the target areas at this time, the remainder of each EOA outside the City's existing sphere, which are defined as "Economic Development Reserve Areas," suggests a potential long-term intent to annex territory for the City to ultimately respond to long-term land demand requirements.

As discussed below, please expand the project description and analysis of impacts, to include all anticipated Sphere of Influence amendments, annexations, and detachments related to the Draft EDE, including long-term, Economic Opportunity Area-related actions beyond the time horizon of the initial six Target Areas.

Infill Development Capacity

The Draft EIR on page 2-5 states that only 31% of land (approximately 4,200 acres) within the city limits and sphere boundary is developed with residential uses including single-family homes, condominiums, apartments, senior housing, and mobile homes. The current City General Plan on page LU-37 further indicates that over 13,000 acres are available for development capacity: 555 acres for Focused Growth Areas, 3,525 acres for Future Growth Areas, and 9,248 in the Remaining City limits. LAFCO actions, following the review of the existing and planned capacity of City of Salinas, have contributed to the City's planned development by approving a 3,347-acre "Future Growth Area" expansion of the Salinas Sphere of Influence and an annexation of 2,388 acres to the City in 2008 and approval of another 246-acre annexation to the City's sphere and jurisdictional boundary in 2010. These annexed areas contain a wide variety of urban land uses but remain currently undeveloped as shown in **Map 2**. These undeveloped areas within the City's existing limits and sphere boundary should be used to address the City's future development needs before consideration of additional unincorporated territory, most of which is prime farmland.

The Draft EIR should further analyze a preferred city infill development scenario that relies on the existing General Plan direction and adopted Spheres of Influence. Based on the Draft EDE, the City currently has over 7,580 acres of land for potential economic development within its existing city limits and Sphere of Influence (refer to Table A on page 2 of this letter). As previously mentioned, State Law directs LAFCOs to foster a

balance between compact growth with efficient service provisions by discouraging urban sprawl and preserving prime agricultural lands. Furthermore, LAFCO is tasked to encourage the conversion of agricultural lands within the jurisdiction or Sphere of Influence of the City of Salinas before approving any future proposal that would lead to such conversion outside the existing city limits or sphere boundary [LAFCO Policies and Procedures, section E.I and Government Code Section 56337(b); 56668(d)]

It is the policy of LAFCO that, consistent with section 56300 (a) of the Act, applications or proposals for a change in organization or reorganization, or for the establishment or any change to a Sphere of Influence or urban service area, shall provide for planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open-space and agricultural lands within those patterns. To implement this policy, it is the further policy of LAFCO that:

1. A Proposal must discuss how it balances the state interest in the preservation of open space and prime agricultural lands against the need for orderly development. (Government Code section 56001.) Proposals that fail to discuss this balance, in the opinion of the executive officer, will be deemed incomplete. Proposals may be denied if they fail to demonstrate to the satisfaction of LAFCO that the need for orderly development is balanced against the preservation of open space and prime agricultural lands.

2. A Proposal must discuss its effect on maintaining the physical and economic integrity of agricultural lands. (Government Code section 56668 (a).) Proposals that fail to discuss their effect, in the opinion of the executive officer, will be deemed incomplete. Proposals may be denied if they fail to demonstrate to the satisfaction of LAFCO that the physical and economic integrity of agricultural lands is maintained.

3. A Proposal must discuss whether it could reasonably be expected to induce, facilitate, or lead to the conversion of existing open-space land to uses other than open-space uses. (Government Code section 56377.) Proposals that fail to discuss potential conversion, in the opinion of the executive officer, will be deemed incomplete. Proposals may be denied if they fail to demonstrate to the satisfaction of LAFCO that: a) they guide development or use of land for other than open-space uses away from existing prime agricultural lands in open-space use and toward areas containing nonprime agricultural lands (Government Code section 56377 (a)); and b) development of existing vacant or nonprime agricultural lands for urban uses within the existing jurisdiction of a local agency or within the Sphere of Influence of a local agency will occur prior to the development of existing open-space lands for non-open-space uses which are outside of the existing jurisdiction of the local agency or outside of the existing Sphere of Influence of the local agency (Government Code section 56377 (b)).

4. A Proposal must, if applicable, provide for pre-zoning (Government Code section 56375 (a)), and must demonstrate that it is consistent with the General Plans and Specific Plans of the existing local agency and any immediately adjacent local agency (Government Code sections 56375 (a) and 56668 (g)). Proposals may be denied if they are not consistent with such plans, or, if not pre-zoned, if the Proposal does not demonstrate to the satisfaction of LAFCO that the existing development entitlements are consistent with the local agency's plans.

Consistency with 2006 Greater Salinas Area Memorandum of Understanding (MOU)

For over 30 years, the City and County have worked collaboratively to preserve the best agricultural land located to the south and west of Salinas, and to provide certain areas for future urban growth. This future growth is to be predominantly in a northeasterly direction, between San Juan Grade Road to the northwest and Williams Road to the southeast. The City initially entered into the Boronda Memorandum of Understanding (MOU) with the County in 1986. The joint effort continued with the City and County replacing the Boronda Area MOU with the Greater Salinas Area MOU in 2006 establishing a broad policy framework to govern and facilitate land use decisions and assure orderly development in their respective

jurisdictions. The primary objective of the latest MOU has been and continues to be threefold: (1) preservation of certain agricultural lands, (2) provision of future growth areas, and (3) establishment of adequate financing for the services and facilities of benefit to the residents of the Greater Salinas Area Plan area and the City. **Map 3** illustrates the direction of future growth agreed upon by the City and County as outlined in the MOU.

Pursuant to CEQA Guidelines, the Draft EIR addressed a "range of reasonable alternatives to the project" including two alternatives involving the adopted MOU between the City of Salinas and the County of Monterey. Alternative 2 (GSA MOU Amendment) removes Target Area N (refer to Map 1) located outside of the City's sphere from the proposed project in light of the County's concern that its development would result in loss of high value agricultural land to the south of the City. Conservation of prime agricultural land south and west of the City is a topic that is addressed in the existing MOU. Alternative 3 (GSA MOU Consistency) includes further modifications to the proposed project that maximize its consistency with the MOU. This alternative would eliminate four of the five Target Areas located outside the City's SOI. These two alternatives, if considered, would reduce many LAFCO concerns outlined in this letter.

The Draft EDE, in its current form, will require revisions to the adopted MOU. Because such revisions would involve the potential for future sphere amendments and annexation proposals, and would directly pertain to LAFCO's legislative purposes, LAFCO should be consulted during the City/County negotiations process and in the course of any future modifications to the adopted MOU.

Consistency with the 2002 General Plan

As described in CEQA Guidelines section 15125(d), an EIR must discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. The Draft EIR on page 2-52 indicates that the Draft EDE contains only one inconsistency with the existing General Plan: Land Use Element Policy LU-2.1 which states "Minimize disruption of agriculture by maintaining a compact city form and directing urban expansion to the North and East, away from the most productive agricultural land." As shown in **Map 4**, proposed EOAs B, F, L1/L2, M, and N as well as Target Areas B, F, L2, and N are located to the south and west of the City and are located on productive farmland. The Draft EDE proposes to modify Policy LU-2.1 as follows:

> Policy LU-2.1: Minimize disruption of agriculture by maintaining a compact city form and directing urban expansion generally to the North and East, away from the most productive agricultural land. except for employment generating development within Target Areas identified in the EDE. The EDE Target Areas represent new Future Growth Areas.

LAFCO has concerns with this section. The City has a long history of preserving prime agricultural lands and directing development away from such areas located south and west of city limits. The existing City General Plan states "The history of Salinas, and the region as a whole, is based on the importance of agriculture….Approximately 16 percent of Salinas jobs are agriculturally-related (i.e. agricultural activities ranging from food processing and distribution to a variety of agricultural support services)…While agriculture is important to the economy of Salinas, agriculture also depends on Salinas for support." The existing General Plan recognizes the importance of agriculture to the City and clearly states that it will "continue to preserve agricultural lands to the extent possible." Page LU-46 of the General Plan also states that "The Future Growth Area has been designed to direct future growth away from the most productive agricultural areas in the south and west of the City. In addition, growth within the Future Growth Area is designed to provide compact development, minimizing the amount of agricultural land that will be needed to meet future growth within the community. Additional growth in the Focused Growth Areas within the urbanized city limits will also help reduce the pressure to convert agricultural lands."

One of the overall themes throughout the City General Plan focuses on not negatively affecting the viability of the most productive agricultural lands and minimizing conflicts on agricultural productivity. Therefore, LAFCO disagrees that the Draft EDE only has one inconsistency within the General Plan. The Draft EIR should reexamine the inconsistencies, not only Policy LU-2.1, but other General Plan policies including but

not limited to the Community Design Element, Land Use Element, Housing Element, and the Conservation/Open Space Plan.

Comments on Proposed EDE Policies

The Draft EIR on page 3-32 indicates that the implementation of certain policies and actions may serve as mitigation for significant impacts including:

> **Action LU-1.7.1:** Work with LAFCO, the County of Monterey, the Monterey County 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 land areas to the City, for Economic Opportunity Areas B, F, K, L, and N.
>
> **Action LU-1.7.3:** Work with Monterey County to revise the Greater Salinas Area Memorandum of Understanding and other related agreements such as tax transfer agreements, to address development on Economic Opportunity Areas located outside the City's Sphere of Influence as identified in the Economic Opportunity Areas map.
>
> **Action LU-1.7.4:** Through a local Agricultural Land Preservation Program, require agricultural conservation easements, where feasible, to protect the most productive agricultural lands such as but not limited to those adjacent to Economic Opportunity Areas B, F and N.
>
> **Action LU-1.12.2:** Work with the County of Monterey to update the Greater Salinas Area Memorandum of Understanding in order to implement the direction of Policy ED-LU-1.12.

LAFCO disagrees that these action items would mitigate significant impacts to prime farmland and other agricultural lands within the EOAs and Target Areas. As shown in **Map 4**, all five target areas include prime farmland and farmland of statewide importance. Specifically, Target Areas B, F, and N have historically been identified as notable prime farmland. As stated throughout this letter, the Draft EDE in its current form is inconsistent with the Cortese-Knox-Hertzberg Act, LAFCO's adopted policies, the existing City General Plan and the adopted City/County MOU. Such inconsistencies and negative impacts to agricultural lands should be addressed through conservation plans, joint efforts with the County and city infill development strategies.

Comments on Coordination of City and LAFCO Processes

Formal submittal, by the City, of applications to LAFCO for consideration of City sphere amendment and annexation actions is anticipated to occur after the City of Salinas completes its environmental review, planning, and prezoning actions. However, the City is encouraged to begin preliminary coordination steps while the Draft EIR is under preparation.

The Draft EDE's identifies annexation of other areas for development in addition to the five target areas in the foreseeable future. Action Item LU-1.7.1 discusses working with LAFCO to annex EOAs D, G, H (portion of) and M which are currently within the City's sphere boundary (refer to **Map 5**). These additional annexation areas encompass the majority of territory currently within the City's sphere. The Draft EDE does not analyze or consider the annexation of two other areas within the City's existing sphere: the Bolsa Knolls neighborhood and the Settrini property. Both areas are located north of the existing city limits. **Map 5** shows the proposed annexation areas including the two additional communities. Please note that a more detailed review of the Settrini property within the Proposed Salinas Central Area Specific Plan will be discussed during the October 23rd Commission Hearing (Agenda Item 8b). LAFCO requests that the Draft EDE include an explanation of why these areas within the City's already-designated sphere do not appear to be planned for annexation in the foreseeable future, while other significant expansions of the City's sphere are being planned.

Whether the target areas and/or the additional annexation areas are considered as part of the Draft EDE, a highly recommended early step is a pre-application meeting between City and LAFCO staff to review issues, processes and application requirements. Items to be discussed would include policy issues; the required City-County Consultation prior to submitting any Sphere of Influence applications to LAFCO (Government Code

section 56425); any plans for the phasing of annexations; information on the ability of local agencies to provide needed public services; proposed public services and public facilities financing plans; coordination with special districts; the required City-County Tax Transfer Agreement; EIR status; application processing costs for staff, counsel and other LAFCO expenses; City-LAFCO schedules; coordination with LAFCO Municipal Service Reviews as may be required; indemnification agreements, etc.

Potential Impacts on Affected Special Districts

LAFCO's future consideration of the City's proposed sphere amendment and annexation applications will necessarily include consideration of related actions for special districts. The Draft EIR does not discuss or analyze the negative impact to affected special districts regarding the proposed annexations and subsequent detachments. If a sphere amendment and annexation application is considered, these proposals will also require detachments from various special districts including but not limited to:

- County Service Area #9 (Oak Park)
- County Service Area #41 (Gabilan Acres/Boronda)
- Monterey County Regional Fire District
- Resource Conservation District of Monterey County

The analysis and any proposed action should be reflected within the project description. If the Draft EIR does not adequately analyze impacts related to future LAFCO approvals, it may be necessary for LAFCO to require supplemental environmental analysis from the City at the time of future LAFCO applications.

Comments on Potential Environmental Effects

As authorized by the Cortese-Knox-Hertzberg Act, LAFCO of Monterey County has adopted local "Policies and Procedures Relating to Spheres of Influence and Changes of Organization and Reorganization." In considering applications for local government boundaries or services, LAFCO considers both the State law and the adopted local policies and procedures. The State law and local policies are available on the LAFCO website at http://www.monterey.lafco.ca.gov/.

The Cortese-Knox-Hertzberg Act and LAFCO's Policies and Procedures are relevant to the Draft EIR. The proposed EDE will result in outcomes or recommendations whose implementation would require LAFCO consideration or approvals (such as annexations or sphere amendments) in the future.

As discussed in the Project Description comments above, the Draft EIR should analyze a preferred city infill development scenario that relies on the adopted Sphere of Influence. In addition, the EIR should evaluate the proposed project, as well as project alternatives in the Draft EIR, for consistency with all relevant sections of the Cortese-Knox-Hertzberg Act and LAFCO Policies and Procedures, to the extent such analysis is possible based on information currently available about potential long-term future development of currently unincorporated sites. Listed below are some of the local LAFCO policies that should be addressed in this consistency analysis:

1. "LAFCO intends that its Sphere of Influence determinations will serve as a master plan for the future organization of local governments within the County. The spheres shall be used to discourage urban sprawl; limit proliferation of local governmental agencies; encourage efficiency, economy and orderly changes in local government; promote compact, community centered urban development; and minimize adverse impacts on lands classified as prime agriculture." [LAFCO Policies and Procedures, section C.II.1]

   All cities, independent special districts and dependent special districts in Monterey County have an adopted Spheres of Influence. The spheres are often tied to the capability to provide public services. Generally, LAFCO requires territory to be included within a Sphere of Influence if that area will need urban services within the next 15 to 20 years. The Draft EIR considers the annexation of five target

areas which have been outside the city's sphere since the initial adoption of a sphere boundary by the Commission in 1981.

The City's long-range planning processes and the current Draft EIR should analyze not only the potential environmental effects of future urban development within the Target Areas, but also within the Economic Development Reserve Areas. If the Draft EDE encourages future urban development outside of the City's adopted Spheres of Influence, the resulting "ripple effect" of such development would adversely impact the existing prime agricultural lands.

2. "LAFCO discourages proposals which will facilitate development that is not in the public interest due to topography, isolation from existing developments, premature intrusion of urban-type developments into a predominantly agricultural area, or other pertinent economic or social reason." [LAFCO Policies and Procedures, section D.VII.6]

   State law grants LAFCO the authority to consider and provide for the preservation of open space and agricultural lands. These types of lands are rated by soil quality and irrigation status by the California Department of Conservation (DOC). The DOC defines Prime Farmland as "irrigated land with the best combination of physical and chemical features able to sustain long term production of agricultural crops." Based on the DOC's Farmland Mapping and Monitoring Program, the majority of the EOAs and Target Areas are designated as Prime Farmland[1]. **Map 4** illustrates the prime farmland surrounding the City's jurisdictional and existing Sphere of Influence. As shown in Map 4, the City of Salinas is surrounded by rich soil, with the lands to the south and west of the City being the most productive. Subsequently, the City has in place an adopted Agricultural Land Preservation Program which contains measures to preserve agricultural lands to the south and west. This conservation approach is aligned with the existing Greater Salinas Area Memorandum of Understanding.

3. "LAFCO, in furtherance of its objectives of preserving prime agricultural land, containing urban sprawl, and in providing a reasonable assurance of a city/district's ability to provide services shall consider the appropriateness of phasing annexation proposals which include territory that is not within a city/district's urban service area and has an expected build-out over a period longer than five to seven years." [LAFCO Policies and Procedures, section D.VIII.1]

4. "It is the policy of LAFCO to encourage and to seek to provide for planned, well-ordered, efficient urban development patterns while at the same time remaining cognizant of the need to give appropriate consideration to the preservation of open space and agricultural land within such patterns." [LAFCO Policies and Procedures, section D.IX.1]

5. "For annexations and Sphere of Influence applications, LAFCO shall consider as part of its decision whether the city in which the annexation or Sphere of Influence amendment is proposed has included certain goals, policies, and objectives into its General Plan that encourage mixed uses, mixed densities, and development patterns that will result in increased efficiency of land use, and that encourages and provides planned, well-ordered, efficient urban development patterns." [LAFCO Policies and Procedures, section D.XIII.1]

   A proposal may be denied if it fails to demonstrate to the satisfaction of LAFCO that it guides development or use of land for other than open-space uses away from existing prime agricultural lands in open-space use and toward areas containing nonprime agricultural lands and/or development of existing vacant or nonprime agricultural lands for urban uses within a local agency's existing jurisdiction or Sphere of Influence will occur prior to the development of existing open-space lands

[1] Data retrieved from the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) which produces maps and statistical data used for analyzing impacts on California's agricultural resources.

for non-open space uses which are outside of a local agency's existing jurisdiction or Sphere of Influence.

6. Regarding potential impacts to agricultural lands:
    a. "A Proposal must discuss how it balances the State interest in the preservation of open space and prime agricultural land against the need for orderly development." [LAFCO Policies and Procedures, section E.II.1]

    b. "A Proposal must discuss its effect on maintaining the physical and economic integrity of agricultural lands." [LAFCO Policies and Procedures, section E.II.2]

    c. "A Proposal must discuss whether it could reasonably be expected to induce, facilitate, or lead to the conversion of existing open-space land to uses other than open-space uses." [LAFCO Policies and Procedures, section E.II.3]

The Draft EDE does include an action item (Action LU-1.7.4) requiring agricultural conservation easements, where feasible, to protect the most productive agricultural lands adjacent to EOAs outside the city's limits and sphere boundary. However, the action item does not address the conversion of prime agricultural land within the EOAs or Target Areas. Pursuant to state mandates, LAFCO must consider guiding such conversion away from prime agricultural land towards non-prime lands.

Additionally, the following mitigation measures proposed in the Draft EIR should not be exclusive to the Target Areas but also the entire Future Development Areas:

- Mitigation Measure (AG-1): mitigation shall include payment of an agricultural land conservation in-lieu fee in effect at the time individual projects are proposed within the Target Areas or dedication of a permanent conservation easement to a qualified third party farmland conservation entity on off-site agricultural land of equal or better quality at a ratio of 1:1.

- Mitigation Measure (AG-2): To avoid conflict, one of the following mitigation options will be implemented by the City:

    1. Development defined as incompatible with a Williamson Act contract pursuant to Government Code Section 51201(e) will be prohibited within the portions of Target Areas B and V that are under Williamson Act contract until the applicable Williamson Act contracts are terminated through cancellation or non-renewal; or

    2. The boundaries of Target Areas B and V will be modified to exclude the acreage within a Williamson Act contract.; or

    3. The portions of Target Areas B and V located on land within a Williamson Act contract will be removed from the Target Area. The equivalent acreage of land to be removed may be relocated to a different Target Area. A general plan amendment and additional CEQA compliance may be required for such a change.

- Mitigation Measure (AG-3): To avoid potential conflicts with a permanent agricultural conservation easement resulting from future development within Target Area B, one of the following mitigation options will be implemented by the City:

    1. Development will be prohibited within parcels under permanent agricultural conservation easement; or

2. Coordinate with the Ag Land Trust to exchange the existing agricultural conservation easement with which development of Target Area B could be in conflict with one or more new conservation easements placed on agricultural land in an alternative location such that conflicts are eliminated.

7. Regarding jobs and housing:
   a. "Proposals must demonstrate through both quantitative and qualitative methods the relationship between the Proposal and the surplus or deficiency of local and county-wide housing supply and demand, and employment availability and creation." [LAFCO Policies and Procedures, section F.II]

   The existing General Plan on page H-24 states that "The City will continue to work with the Monterey County Local Agency Formation Commission, Association of Monterey Bay Area Governments, and regional service providers to ensure that sufficient land for residential development is available, agricultural land is preserved, and appropriate infrastructure and services are available to meet the City's future housing needs." As previously mentioned, the Draft EDE is inconsistent with several General Plan Elements including the Housing Element.

   b. "Additionally, the Proposal must demonstrate how its pattern of land use and transportation complements local and regional objectives and goals for the improvement of air quality and reduction of greenhouse gas (GHG) emissions and local vehicle miles traveled (VMT)." [LAFCO Policies and Procedures, section F.II]

LAFCO requests that the Draft EIR address how the EDE does or does not conform to the full range of LAFCO's adopted policies and related State laws, as discussed above, 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.

We appreciate this opportunity to provide comments on the Draft EIR, subject to Commission authorization on October 23. 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

Attachments:
A) City of Salinas Proposed Economic Development Reserve Areas

Maps:
1) Draft EDE's Proposed Future Development Areas
2) 2008 and 2010 Annexation and Sphere Expansion Areas

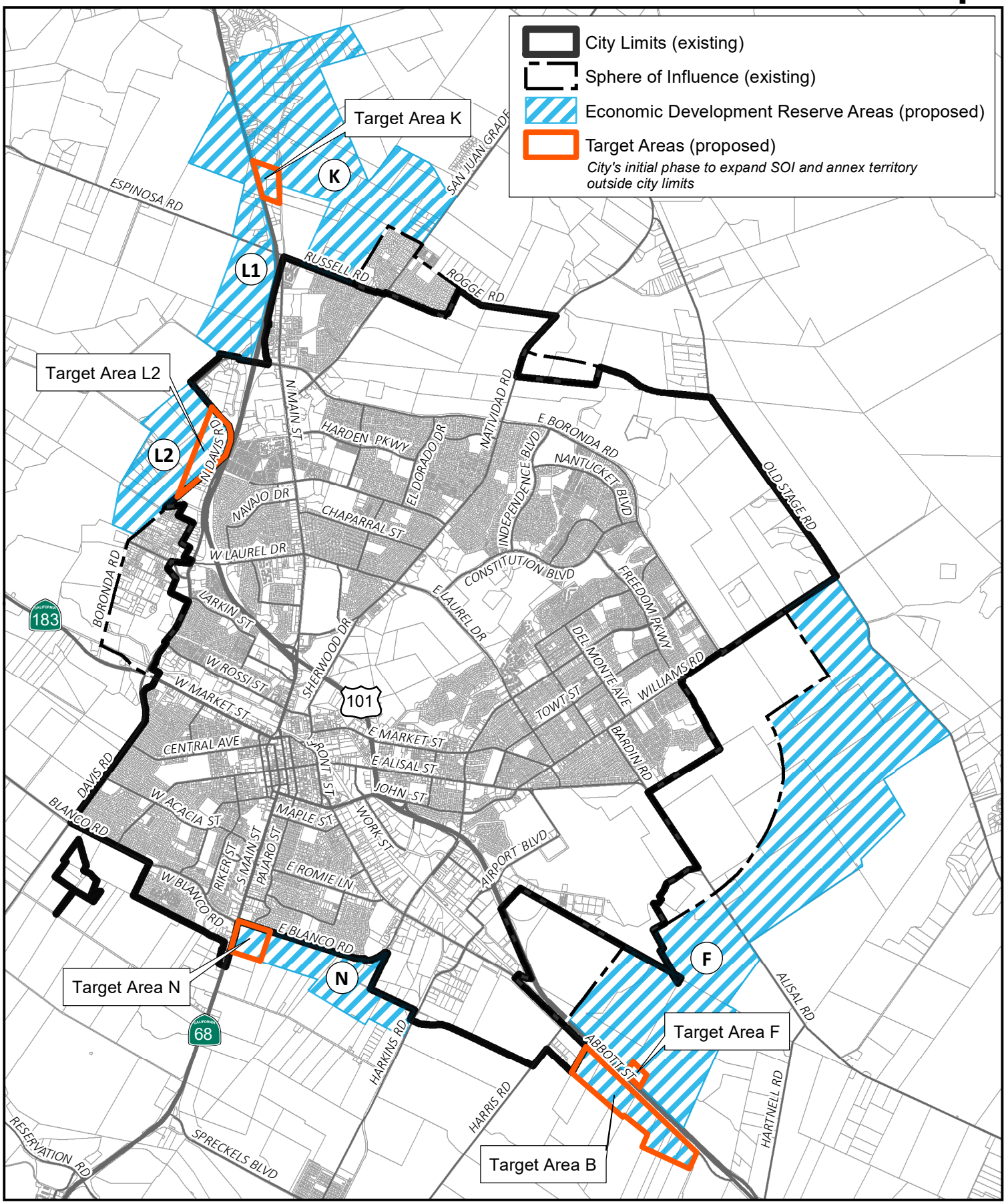
3) Direction of Future Growth Agreed Upon by the City and County per MOU
4) Prime Farmland Within Proposed Growth Areas
5) Proposed Annexation Areas Within City's Sphere of Influence

Attachment A
City of Salinas – Draft Economic Development Element
Overview of Proposed Future Development Areas

Proposed Future Development Areas Within Existing City Limits	Acres	Proposed Land Use	Includes Prime Farmland
A: Uni-Kool	259.35	Industrial	Yes
C: Airport Industrial Park	86.16	Industrial	No
E: Airport East/Hartnell	175.98	Business Park	Yes
H: East Future Growth Area*	838.60	Not Disclosed in DEIR	Yes
I: West/Central Future Growth Area	1,541.43	Not Disclosed in DEIR	Yes
O: Valley Center Corridor	145.49	Not Disclosed in DEIR	No
P: Vibrancy Plan Area	223.67	Not Disclosed in DEIR	No
Q: TOD Rail Infill	74.55	Not Disclosed in DEIR	No
R: Chinatown	29.17	Not Disclosed in DEIR	No
S: North Main Street	292.80	Not Disclosed in DEIR	No
T: Alisal Market Place	132.26	Not Disclosed in DEIR	No
U: East Alisal/East Market	309.82	Not Disclosed in DEIR	No
V: Carr Lake	989.89	Park, Retail	Yes
W: West Market	153.72	Not Disclosed in DEIR	Yes
X: Abbott	204.32	Not Disclosed in DEIR	No
Y: Lower Abbott	618.23	Not Disclosed in DEIR	No
Total Acreage	**6,075.44**	**41.3% of the entire future development areas**	
Proposed Future Development Areas Within Existing City SOI	**Acres**	**Proposed Land Use**	**Includes Prime Farmland**
D: Airport West	343.04	Industrial	Yes
G: Alisal/Airport East	395.63	Industrial	Yes
H: East Future Growth Area*	559.07	Not Disclosed in DEIR	Yes
M: Boronda South	208.00	Not Disclosed in DEIR	Yes
Total Acreage	**1,505.74**	**10.2% of the entire future development areas**	
Proposed Future Development Areas Outside Existing City Limits & SOI	**Acres**	**Proposed Land Use**	**Includes Prime Farmland**
B: Abbott Industrial Park	167.65	Industrial, Retail	Yes
F: Eastern Expressway	2,530.04	Retail	Yes
J: North Future Growth Area	2,155.76	Future Study Area	Yes
K: North Entrance	1,190.48	Business Park, Residential	Yes
L1: Westside Expressway	431.05	Retail	Yes
L2: Westside Expressway	378.61	Retail	Yes
N: Highway 68 Gateway	293.23	Business Park, Retail	Yes
Total Acreage	**7,146.82**	**48.5% of the entire future development areas**	
Total Acreage for Entire Proposed Future Development Areas	**14,728.00**		

**The western portion of EOA H is within the city limits, while the eastern portion is outside the city limits, but within the SOI*

Map 1



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

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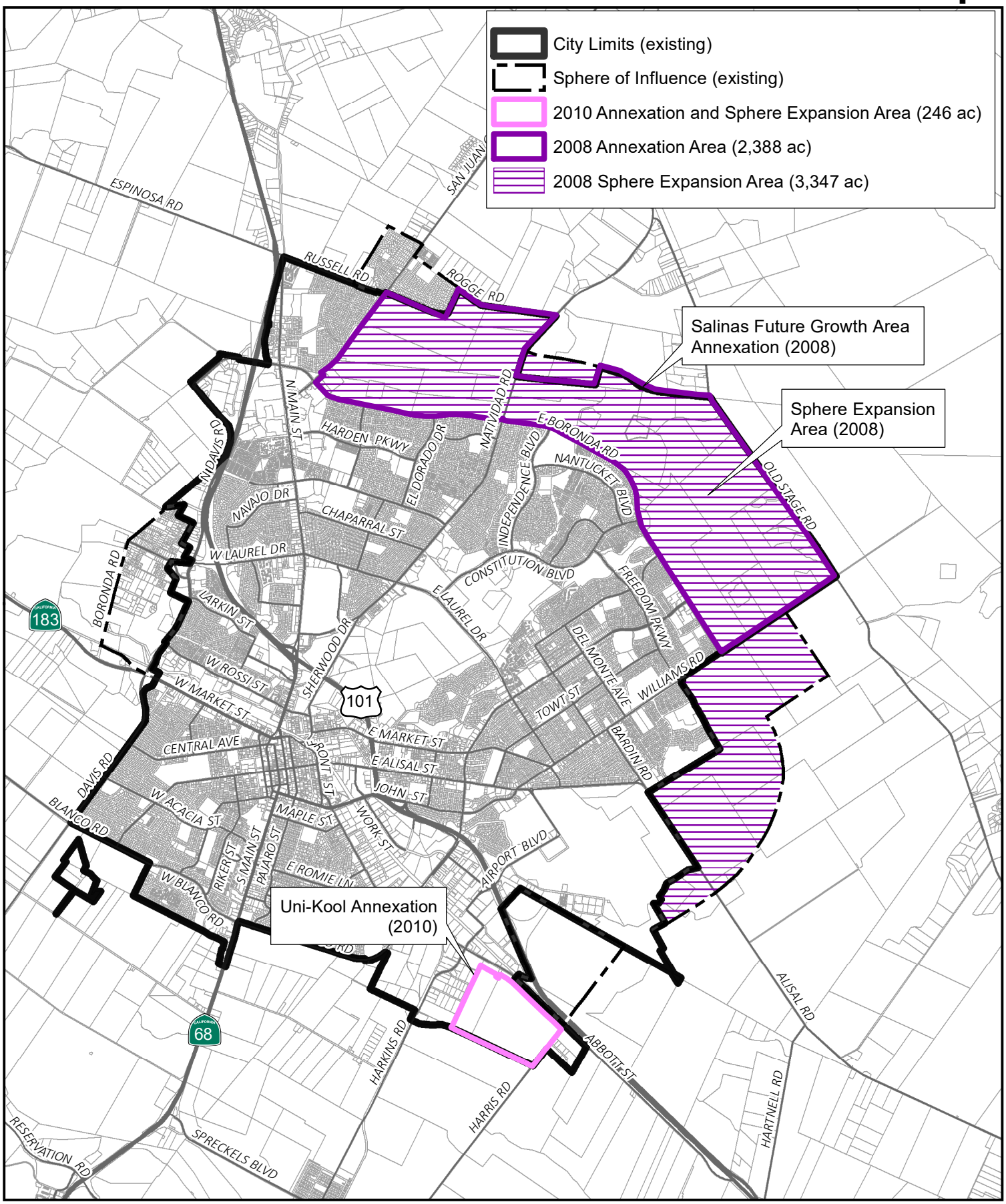
Miles

CITY OF SALINAS

Proposed Growth Areas Outside
Existing City Limits and Sphere of Influence

Map Prepared: 10/13/2017

Map 2



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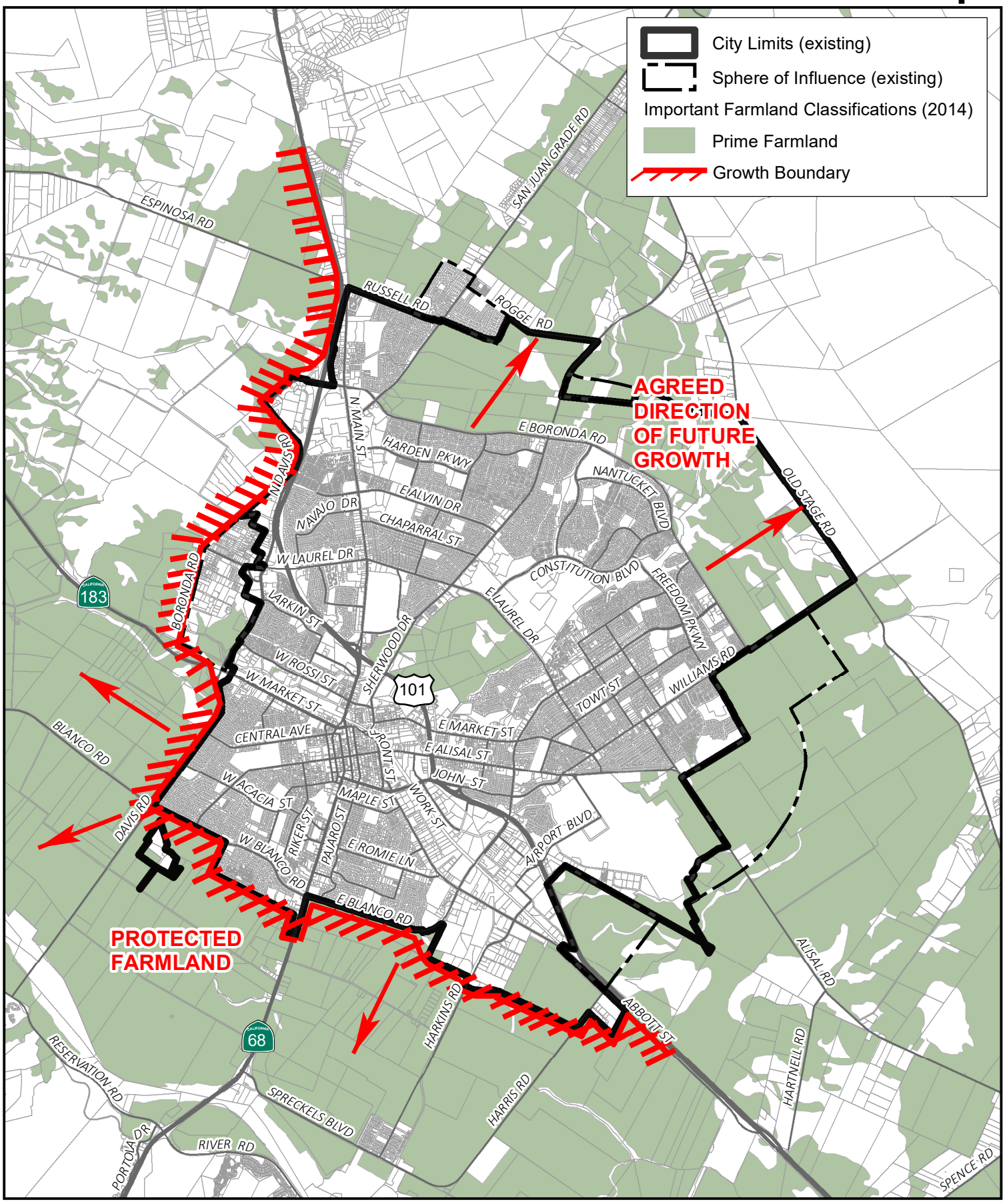
CITY OF SALINAS

2008 & 2010 Annexation and Sphere Expansion Areas

Map Prepared: 10/13/2017

Map 3



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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

N

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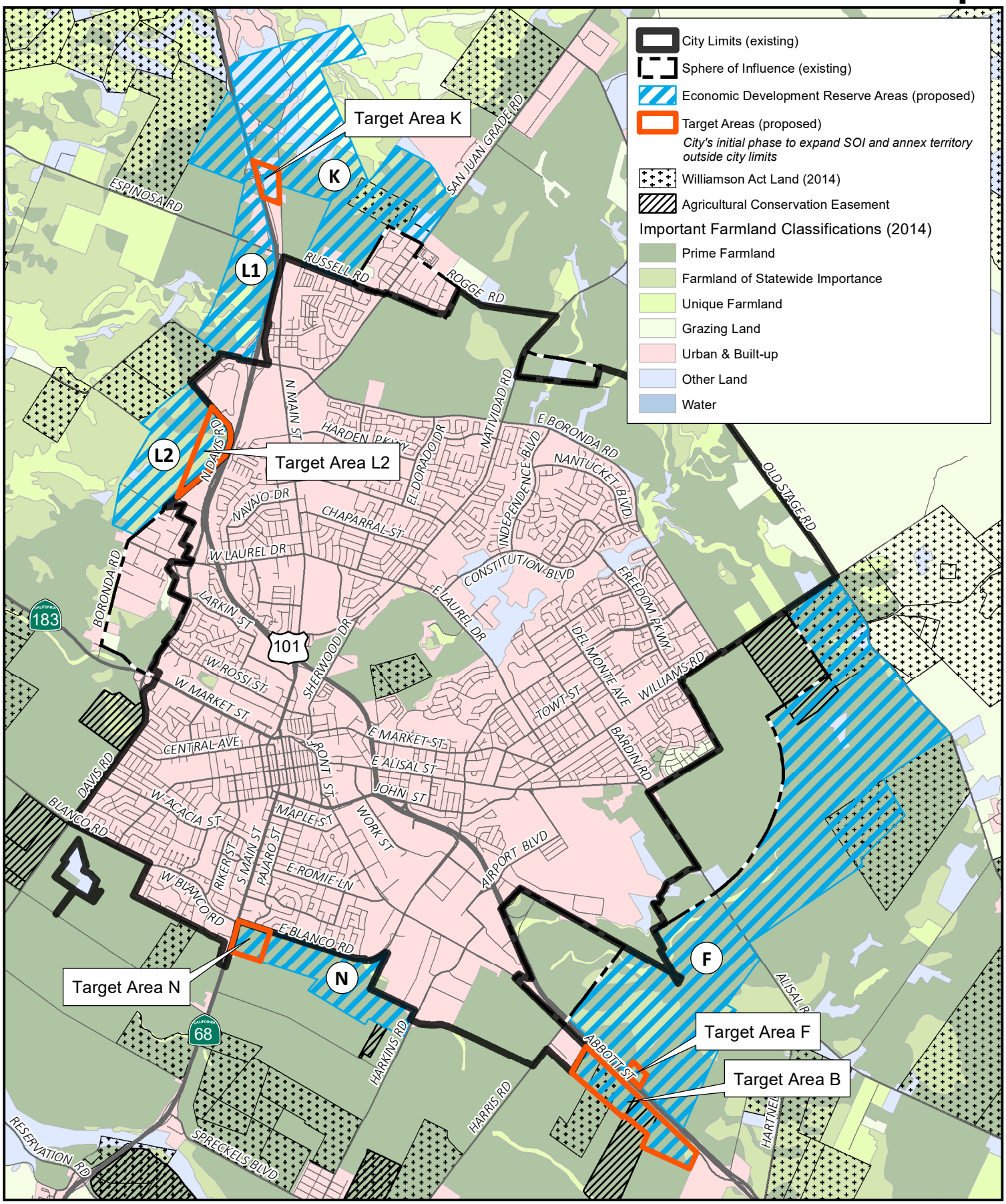
CITY OF SALINAS

Greater Salinas Area
Memorandum of Understanding
Adopted by the City and County (2006)

Map Prepared: 10/13/2017

Map 4



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

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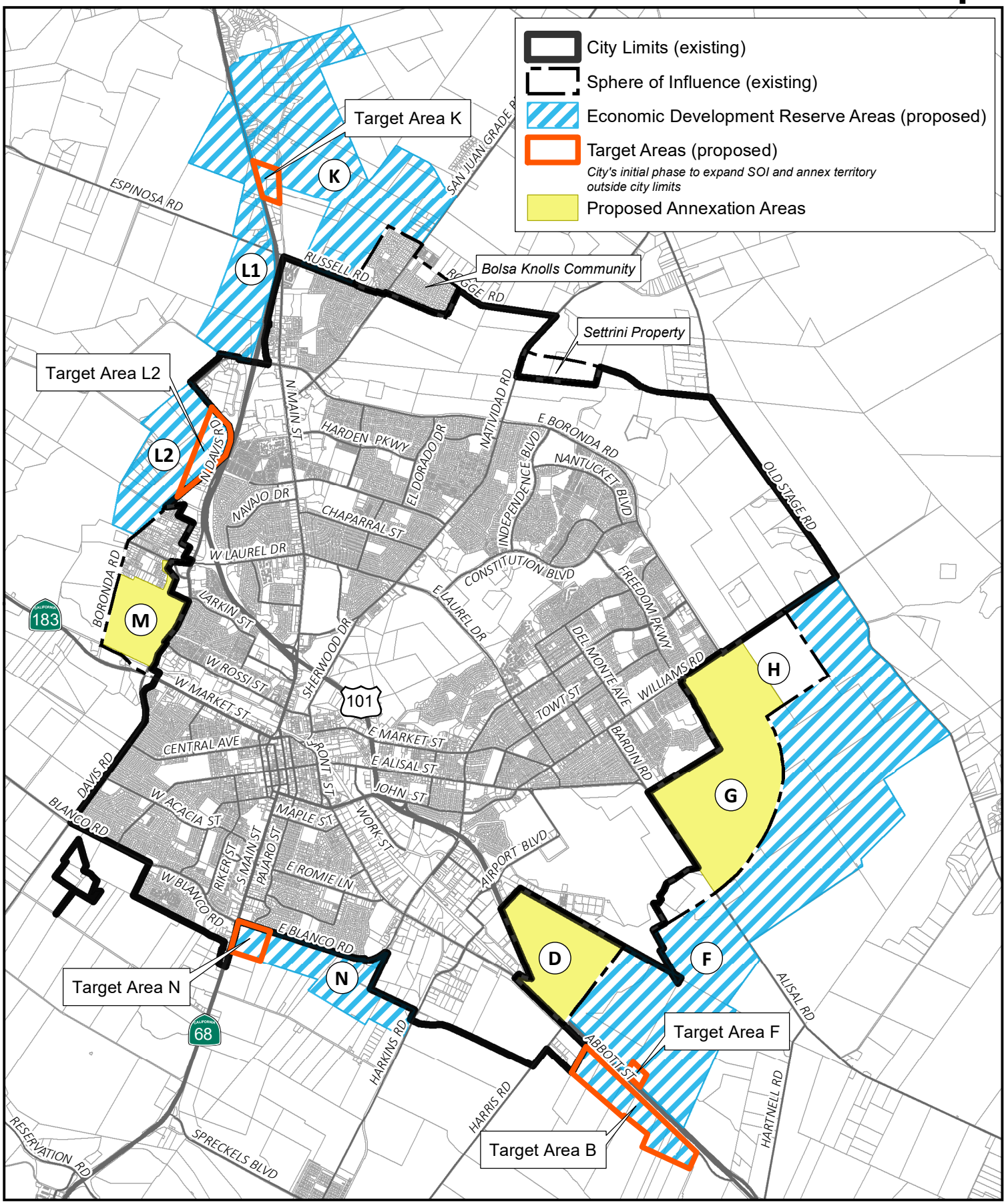
CITY OF SALINAS

Prime Farmland Within Proposed Growth Areas

Map Prepared: 10/13/2017

Map 5



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

N

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CITY OF SALINAS

Proposed Annexation Areas
Within City's Sphere of Influence

Map Prepared: 10/13/2017

LAFCO *of Monterey County*

LOCAL AGENCY FORMATION COMMISSION OF MONTEREY COUNTY

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

P. O. Box 1369
Salinas, CA 93902

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

www.monterey.lafco.ca.gov

October 24, 2017

Lisa Brinton, Senior Planner
Community Development Department
City of Salinas
65 West Alisal Street
Salinas, California 93901

RE: Draft Program Environmental Impact Report (EIR) for the Proposed City of Salinas Economic Development Element of the General Plan

Dear Ms. Brinton:

This is a follow-up to my October 18, 2017 letter to you commenting on the subject Draft Program EIR, and contains the official comments of the Local Agency Formation Commission of Monterey County (LAFCO). LAFCO is a CEQA Responsible Agency, with regulatory authority for future local government boundary and service applications in the proposed development areas outside the City's existing jurisdiction. It is in this role that the Commission is commenting on the Draft Program EIR for a Draft Economic Development Element (EDE) to be added to the City's General Plan.

On behalf of the Commission, I would like to first of all thank you for your participation at the October 23rd LAFCO meeting. Also at that meeting, the Commission authorized my initial comment letter with the inclusion of a letter from the Monterey County Regional Fire District (MCRFD) as an additional attachment. In the letter addressed to the LAFCO Executive Officer, the MCRFD expands upon LAFCO comments about the potential impacts of the proposed economic development proposals on special districts.

By commenting on the proposed economic development program at this early stage of the City's planning process, it is LAFCO's respectful intention that the City may anticipate and address the issues prior to future submittal of any growth applications to LAFCO. Our comments pertaining to the Draft EIR are also intended to be of assistance in preparing a revised and expanded CEQA document at this time.

Overview

The Draft Economic Development Element of the Salinas General Plan is an initial step toward significant City growth in the future. Consisting of over 14,700 acres, the proposed growth areas would significantly expand the City's boundaries in all directions. Nearly 50 percent of the future growth would take place outside the existing City limits and adopted Sphere of Influence. Another ten percent is outside of the existing City limits but inside the adopted Sphere of Influence. Most of the proposed growth would take place on prime farmland or farmland of statewide importance. To put this proposal in context, a current development capacity of more than 13,000 acres is already available to the City, per the adopted Salinas General Plan. The current development capacity includes more than 3,500 acres added to the City's Sphere of Influence in 2008, and more than 2,600 acres annexed to the City in 2008 and 2010 – almost all of which is still unbuilt to date. In summary, the proposed Economic Development Element would add significantly to the City's current development capacity.

The proposed economic development expansion areas raise substantial concerns relating to conformance with LAFCO's legislative purposes (which include discouraging urban sprawl, preserving prime agricultural lands, encouraging the orderly growth and development of local agencies, and ensuring the efficient delivery of municipal services). The proposal also raises issues of inconsistency with various LAFCO-related State mandates and locally adopted policies for Sphere of Influence amendments and annexations. One concern is the justification for major outward expansion when substantial development capacity is already available per City documents. The Draft Economic Development Element also appears to be inconsistent with several existing Salinas General Plan policies including those related to infill development, agricultural land preservation, etc. In addition, the proposal is inconsistent with key provisions of the adopted Greater Salinas Area Memorandum of Understanding between the City of Salinas and the County of Monterey.

LAFCO's concerns pertain not only to the proposed development reserve areas for which there is no development timeframe, but also to five of the identified six target areas proposed for development in the foreseeable future. The target areas represent the proposed first phase of economic development. Five of the proposed target areas, encompassing 443 acres, are currently in unincorporated County territory and outside the City's existing Sphere of Influence. All five are located on prime farmland or farmland of statewide importance. For example, Target Area N, south of Blanco Road, is on farmland that is among the most distinguished in the nation. Target Area B includes farmlands already in conservation easements and with a Williamson Act contract. While their acreage is a relatively small part of the 14,700+ acre proposed development reserve areas, all five target areas contribute to the high economic value of the local agricultural industry. As such, their development would also be inconsistent with LAFCO's state mandates, LAFCO's adopted local policies, various policies of the existing City General Plan, and with the adopted City/County Memorandum of Understanding.

The Draft Environmental Impact Report for the proposed EDE contains very limited LAFCO conformance-related information. It defers the identification and analysis of most LAFCO policies and mandates to the future. In its present draft form, the EIR contains inadequate information for use by LAFCO in our role as a Responsible Agency under CEQA. While LAFCO recognizes the inherently general nature of a program-level EIR, the City is nonetheless encouraged to revise the Draft EIR to address how the EDE does or does not conform 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 lands. The City should also anticipate that significant additional, more detailed, CEQA review will be necessary to support any future project-specific applications for LAFCO approval of actions related to the EDE.

LAFCO Authority

LAFCO's statutory authority to regulate local government boundaries and services is derived from the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code Section 56000, et seq.). Among the purposes of the Local Agency Formation Commission are discouraging urban sprawl, preserving open space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation, growth and development of local agencies based upon local conditions and circumstances (Government Code Section 56301).

The Cortese-Knox-Hertzberg Act further provides that "In order to carry out its purposes and responsibilities for planning and shaping the logical and orderly development and coordination of local governmental agencies to advantageously provide for the present and future needs of the county and its communities, the [LAFCO] commission shall develop and determine the Sphere of Influence of each city and special district within the county and enact policies designed to promote the logical and orderly development of areas within the sphere" (Government Code Section 56425a). The Draft EDE provides a basis for future city decisions including local land use designations, transportation planning and funding, expansion of municipal service provisions and other public service infrastructure that are necessary to meet the anticipated long-term employment needs and support overall future development. Many of these city decisions will involve action by LAFCO.

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

Comments on Project Description

It is our understanding that the Draft EDE considered by the City of Salinas covers almost 15,000 acres (approximately 23 square miles). Over half of these lands are outside current city limits (8,652 acres; 13.5 square miles). Approximately 7,000 acres of unincorporated territory, representing 49% of the City's entire future development area, is outside the City's existing Sphere of Influence, as designated by the Local Agency Formation Commission of Monterey County (LAFCO). **Attachment A** provides a more detailed overview of the entire future development areas identified in the Draft EDE. Development of currently unincorporated areas would be subject to LAFCO's approval of future Sphere amendments and annexation proposals at a future date.

The following table summarizes the location of the future development areas identified in the Draft EDE.

Table A: Location of EDE's Proposed Future Development Areas

Future Development Areas	Acreage	%
Within Existing City Limits	6,075.44	41.3%
Within Adopted City Sphere of Influence (SOI)	1,505.74	10.2%
Outside Existing City Limits & Adopted SOI	7,146.82	48.5%
Total Acreage	**14,728.00**	**100%**

It is also our understanding that the City's initial phase of the EDE's future development involves six non-contiguous "Target Areas." Five of the six target areas, encompassing 443 acres, are currently unincorporated County territory and outside the City's existing Sphere of Influence. These target areas were derived from the Draft EDE's Economic Opportunity Areas (EOAs): lands identified by the City as potential future economic development within areas located adjacent to, but outside its existing sphere which total approximately 15,000 acres. **Map 1** depicting the EOAs and target areas in relation to the City's sphere is attached to this letter for further illustration. While the Draft EDE only focuses on development within the target areas at this time, the remainder of each EOA outside the City's existing sphere, which are defined as "Economic Development Reserve Areas," suggests a potential long-term intent to annex territory for the City to ultimately respond to long-term land demand requirements.

As discussed below, please expand the project description and analysis of impacts, to include all anticipated Sphere of Influence amendments, annexations, and detachments related to the Draft EDE, including long-term, Economic Opportunity Area-related actions beyond the time horizon of the initial six Target Areas.

Infill Development Capacity

The Draft EIR on page 2-5 states that only 31% of land (approximately 4,200 acres) within the city limits and sphere boundary is developed with residential uses including single-family homes, condominiums, apartments, senior housing, and mobile homes. The current City General Plan on page LU-37 further indicates that over 13,000 acres are available for development capacity: 555 acres for Focused Growth Areas, 3,525 acres for Future Growth Areas, and 9,248 in the Remaining City limits. LAFCO actions, following the review of the existing and planned capacity of City of Salinas, have contributed to the City's planned development by approving a 3,347-acre "Future Growth Area" expansion of the Salinas Sphere of Influence and an annexation of 2,388 acres to the City in 2008 and approval of another 246-acre annexation to the City's sphere and jurisdictional boundary in 2010. These annexed areas contain a wide variety of urban land uses but remain currently undeveloped as shown in **Map 2**. These undeveloped areas within the City's existing limits and sphere boundary should be used to address the City's future development needs before consideration of additional unincorporated territory, most of which is prime farmland.

The Draft EIR should further analyze a preferred city infill development scenario that relies on the existing General Plan direction and adopted Spheres of Influence. Based on the Draft EDE, the City currently has over 7,580 acres of land for potential economic development within its existing city limits and Sphere of Influence (refer to Table A on page 2 of this letter). As previously mentioned, State Law directs LAFCOs to foster a balance between compact growth with efficient service provisions by discouraging urban sprawl and preserving prime agricultural lands. Furthermore, LAFCO is tasked to encourage the conversion of agricultural lands within the jurisdiction or Sphere of Influence of the City of Salinas before approving any future proposal that would lead to such conversion outside the existing city limits or sphere boundary [LAFCO Policies and Procedures, section E.I and Government Code Section 56337(b); 56668(d)]

It is the policy of LAFCO that, consistent with section 56300 (a) of the Act, applications or proposals for a change in organization or reorganization, or for the establishment or any change to a Sphere of Influence or urban service area, shall provide for planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open-space and agricultural lands within those patterns. To implement this policy, it is the further policy of LAFCO that:

1. A Proposal must discuss how it balances the state interest in the preservation of open space and prime agricultural lands against the need for orderly development. (Government Code section 56001.) Proposals that fail to discuss this balance, in the opinion of the executive officer, will be deemed incomplete. Proposals may be denied if they fail to demonstrate to the satisfaction of LAFCO that the need for orderly development is balanced against the preservation of open space and prime agricultural lands.

2. A Proposal must discuss its effect on maintaining the physical and economic integrity of agricultural lands. (Government Code section 56668 (a).) Proposals that fail to discuss their effect, in the opinion of the executive officer, will be deemed incomplete. Proposals may be denied if they fail to demonstrate to the satisfaction of LAFCO that the physical and economic integrity of agricultural lands is maintained.

3. A Proposal must discuss whether it could reasonably be expected to induce, facilitate, or lead to the conversion of existing open-space land to uses other than open-space uses. (Government Code section 56377.) Proposals that fail to discuss potential conversion, in the opinion of the executive officer, will be deemed incomplete. Proposals may be denied if they fail to demonstrate to the satisfaction of LAFCO that: a) they guide development or use of land for other than open-space uses away from existing prime agricultural lands in open-space use and toward areas containing nonprime agricultural lands (Government Code section 56377 (a)); and b) development of existing vacant or nonprime agricultural lands for urban uses within the existing jurisdiction of a local agency or within the Sphere of Influence of a local agency will occur prior to the development of existing open-space lands for non-open-space uses which are outside of the existing jurisdiction of the local agency or outside of the existing Sphere of Influence of the local agency (Government Code section 56377 (b)).

4. A Proposal must, if applicable, provide for pre-zoning (Government Code section 56375 (a)), and must demonstrate that it is consistent with the General Plans and Specific Plans of the existing local agency and any immediately adjacent local agency (Government Code sections 56375 (a) and 56668 (g)). Proposals may be denied if they are not consistent with such plans, or, if not pre-zoned, if the Proposal does not demonstrate to the satisfaction of LAFCO that the existing development entitlements are consistent with the local agency's plans.

Consistency with 2006 Greater Salinas Area Memorandum of Understanding (MOU)

For over 30 years, the City and County have worked collaboratively to preserve the best agricultural land located to the south and west of Salinas, and to provide certain areas for future urban growth. This future growth is to be predominantly in a northeasterly direction, between San Juan Grade Road to the northwest

and Williams Road to the southeast. The City initially entered into the Boronda Memorandum of Understanding (MOU) with the County in 1986. The joint effort continued with the City and County replacing the Boronda Area MOU with the Greater Salinas Area MOU in 2006 establishing a broad policy framework to govern and facilitate land use decisions and assure orderly development in their respective jurisdictions. The primary objective of the latest MOU has been and continues to be threefold: (1) preservation of certain agricultural lands, (2) provision of future growth areas, and (3) establishment of adequate financing for the services and facilities of benefit to the residents of the Greater Salinas Area Plan area and the City. **Map 3** illustrates the direction of future growth agreed upon by the City and County as outlined in the MOU.

Pursuant to CEQA Guidelines, the Draft EIR addressed a "range of reasonable alternatives to the project" including two alternatives involving the adopted MOU between the City of Salinas and the County of Monterey. Alternative 2 (GSA MOU Amendment) removes Target Area N (refer to Map 1) located outside of the City's sphere from the proposed project in light of the County's concern that its development would result in loss of high value agricultural land to the south of the City. Conservation of prime agricultural land south and west of the City is a topic that is addressed in the existing MOU. Alternative 3 (GSA MOU Consistency) includes further modifications to the proposed project that maximize its consistency with the MOU. This alternative would eliminate four of the five Target Areas located outside the City's SOI. These two alternatives, if considered, would reduce many LAFCO concerns outlined in this letter.

The Draft EDE, in its current form, will require revisions to the adopted MOU. Because such revisions would involve the potential for future sphere amendments and annexation proposals, and would directly pertain to LAFCO's legislative purposes, LAFCO should be consulted during the City/County negotiations process and in the course of any future modifications to the adopted MOU.

Consistency with the 2002 General Plan

As described in CEQA Guidelines section 15125(d), an EIR must discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. The Draft EIR on page 2-52 indicates that the Draft EDE contains only one inconsistency with the existing General Plan: Land Use Element Policy LU-2.1 which states "Minimize disruption of agriculture by maintaining a compact city form and directing urban expansion to the North and East, away from the most productive agricultural land." As shown in **Map 4**, proposed EOAs B, F, L1/L2, M, and N as well as Target Areas B, F, L2, and N are located to the south and west of the City and are located on productive farmland. The Draft EDE proposes to modify Policy LU-2.1 as follows:

> Policy LU-2.1: Minimize disruption of agriculture by maintaining a compact city form and directing urban expansion generally to the North and East, away from the most productive agricultural land. except for employment generating development within Target Areas identified in the EDE. The EDE Target Areas represent new Future Growth Areas.

LAFCO has concerns with this section. The City has a long history of preserving prime agricultural lands and directing development away from such areas located south and west of city limits. The existing City General Plan states "The history of Salinas, and the region as a whole, is based on the importance of agriculture….Approximately 16 percent of Salinas jobs are agriculturally-related (i.e. agricultural activities ranging from food processing and distribution to a variety of agricultural support services)…While agriculture is important to the economy of Salinas, agriculture also depends on Salinas for support." The existing General Plan recognizes the importance of agriculture to the City and clearly states that it will "continue to preserve agricultural lands to the extent possible." Page LU-46 of the General Plan also states that "The Future Growth Area has been designed to direct future growth away from the most productive agricultural areas in the south and west of the City. In addition, growth within the Future Growth Area is designed to provide compact development, minimizing the amount of agricultural land that will be needed to meet future growth within the community. Additional growth in the Focused Growth Areas within the urbanized city limits will also help reduce the pressure to convert agricultural lands."

One of the overall themes throughout the City General Plan focuses on not negatively affecting the viability of the most productive agricultural lands and minimizing conflicts on agricultural productivity. Therefore, LAFCO disagrees that the Draft EDE only has one inconsistency within the General Plan. The Draft EIR should reexamine the inconsistencies, not only Policy LU-2.1, but other General Plan policies including but not limited to the Community Design Element, Land Use Element, Housing Element, and the Conservation/Open Space Plan.

Comments on Proposed EDE Policies

The Draft EIR on page 3-32 indicates that the implementation of certain policies and actions may serve as mitigation for significant impacts including:

> **Action LU-1.7.1:** Work with LAFCO, the County of Monterey, the Monterey County 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 land areas to the City, for Economic Opportunity Areas B, F, K, L, and N.
>
> **Action LU-1.7.3:** Work with Monterey County to revise the Greater Salinas Area Memorandum of Understanding and other related agreements such as tax transfer agreements, to address development on Economic Opportunity Areas located outside the City's Sphere of Influence as identified in the Economic Opportunity Areas map.
>
> **Action LU-1.7.4:** Through a local Agricultural Land Preservation Program, require agricultural conservation easements, where feasible, to protect the most productive agricultural lands such as but not limited to those adjacent to Economic Opportunity Areas B, F and N.
>
> **Action LU-1.12.2:** Work with the County of Monterey to update the Greater Salinas Area Memorandum of Understanding in order to implement the direction of Policy ED-LU-1.12.

LAFCO disagrees that these action items would mitigate significant impacts to prime farmland and other agricultural lands within the EOAs and Target Areas. As shown in **Map 4**, all five target areas include prime farmland and farmland of statewide importance. Specifically, Target Areas B, F, and N have historically been identified as notable prime farmland. As stated throughout this letter, the Draft EDE in its current form is inconsistent with the Cortese-Knox-Hertzberg Act, LAFCO's adopted policies, the existing City General Plan and the adopted City/County MOU. Such inconsistencies and negative impacts to agricultural lands should be addressed through conservation plans, joint efforts with the County and city infill development strategies.

Comments on Coordination of City and LAFCO Processes

Formal submittal, by the City, of applications to LAFCO for consideration of City sphere amendment and annexation actions is anticipated to occur after the City of Salinas completes its environmental review, planning, and prezoning actions. However, the City is encouraged to begin preliminary coordination steps while the Draft EIR is under preparation.

The Draft EDE's identifies annexation of other areas for development in addition to the five target areas in the foreseeable future. Action Item LU-1.7.1 discusses working with LAFCO to annex EOAs D, G, H (portion of) and M which are currently within the City's sphere boundary (refer to **Map 5**). These additional annexation areas encompass the majority of territory currently within the City's sphere. The Draft EDE does not analyze or consider the annexation of two other areas within the City's existing sphere: the Bolsa Knolls neighborhood and the Settrini property. Both areas are located north of the existing city limits. **Map 5** shows the proposed annexation areas including the two additional communities. Please note that a more detailed review of the Settrini property within the Proposed Salinas Central Area Specific Plan will be discussed during the October 23rd Commission Hearing (Agenda Item 8b). LAFCO requests that the Draft EDE include an explanation of why these areas within the City's already-designated sphere do not appear to be planned for annexation in the foreseeable future, while other significant expansions of the City's sphere are being planned.

Whether the target areas and/or the additional annexation areas are considered as part of the Draft EDE, a highly recommended early step is a pre-application meeting between City and LAFCO staff to review issues, processes and application requirements. Items to be discussed would include policy issues; the required City-County Consultation prior to submitting any Sphere of Influence applications to LAFCO (Government Code section 56425); any plans for the phasing of annexations; information on the ability of local agencies to provide needed public services; proposed public services and public facilities financing plans; coordination with special districts; the required City-County Tax Transfer Agreement; EIR status; application processing costs for staff, counsel and other LAFCO expenses; City-LAFCO schedules; coordination with LAFCO Municipal Service Reviews as may be required; indemnification agreements, etc.

Potential Impacts on Affected Special Districts

LAFCO's future consideration of the City's proposed sphere amendment and annexation applications will necessarily include consideration of related actions for special districts. The Draft EIR does not discuss or analyze the negative impact to affected special districts regarding the proposed annexations and subsequent detachments. If a sphere amendment and annexation application is considered, these proposals will also require detachments from various special districts including but not limited to:

- County Service Area #9 (Oak Park)
- County Service Area #41 (Gabilan Acres/Boronda)
- Monterey County Regional Fire District
- Resource Conservation District of Monterey County

The Monterey County Regional Fire District (MCRFD) has also prepared a response to the Draft EIR (refer to **Attachment B**). The District identifies several issues pertaining to the adverse effects of any future annexations resulting in subsequent detachments from the MCRFD. These issues include potential loss or cumulative loss of property tax revenue and significant effects on anticipated service demand. The MCRFD letter also highlights upcoming deadlines regarding the "Master Tax Transfer upon Annexation" agreement between the City of Salinas and the County. This agreement remains in effect until January 1, 2023, however, the agreement requires that both parties meet and confer on possible continuation or amendments of its terms no later than January 1, 2018. The District requests to participate during negotiation of any tax transfer agreements.

This example further illustrates the need for the Draft EIR to adequately analyze such impacts to affected agencies. Therefore, the analysis and any proposed action should be reflected within the project description. If the Draft EIR does not adequately analyze impacts related to future LAFCO approvals, it may be necessary for LAFCO to require supplemental environmental analysis from the City at the time of future LAFCO applications.

Comments on Potential Environmental Effects

As authorized by the Cortese-Knox-Hertzberg Act, LAFCO of Monterey County has adopted local "Policies and Procedures Relating to Spheres of Influence and Changes of Organization and Reorganization." In considering applications for local government boundaries or services, LAFCO considers both the State law and the adopted local policies and procedures. The State law and local policies are available on the LAFCO website at http://www.monterey.lafco.ca.gov/.

The Cortese-Knox-Hertzberg Act and LAFCO's Policies and Procedures are relevant to the Draft EIR. The proposed EDE will result in outcomes or recommendations whose implementation would require LAFCO consideration or approvals (such as annexations or sphere amendments) in the future.

As discussed in the Project Description comments above, the Draft EIR should analyze a preferred city infill development scenario that relies on the adopted Sphere of Influence. In addition, the EIR should evaluate the proposed project, as well as project alternatives in the Draft EIR, for consistency with all relevant sections of

the Cortese-Knox-Hertzberg Act and LAFCO Policies and Procedures, to the extent such analysis is possible based on information currently available about potential long-term future development of currently unincorporated sites. Listed below are some of the local LAFCO policies that should be addressed in this consistency analysis:

1. "LAFCO intends that its Sphere of Influence determinations will serve as a master plan for the future organization of local governments within the County. The spheres shall be used to discourage urban sprawl; limit proliferation of local governmental agencies; encourage efficiency, economy and orderly changes in local government; promote compact, community centered urban development; and minimize adverse impacts on lands classified as prime agriculture." [LAFCO Policies and Procedures, section C.II.1]

   All cities, independent special districts and dependent special districts in Monterey County have an adopted Spheres of Influence. The spheres are often tied to the capability to provide public services. Generally, LAFCO requires territory to be included within a Sphere of Influence if that area will need urban services within the next 15 to 20 years. The Draft EIR considers the annexation of five target areas which have been outside the city's sphere since the initial adoption of a sphere boundary by the Commission in 1981.

   The City's long-range planning processes and the current Draft EIR should analyze not only the potential environmental effects of future urban development within the Target Areas, but also within the Economic Development Reserve Areas. If the Draft EDE encourages future urban development outside of the City's adopted Spheres of Influence, the resulting "ripple effect" of such development would adversely impact the existing prime agricultural lands.

2. "LAFCO discourages proposals which will facilitate development that is not in the public interest due to topography, isolation from existing developments, premature intrusion of urban-type developments into a predominantly agricultural area, or other pertinent economic or social reason." [LAFCO Policies and Procedures, section D.VII.6]

   State law grants LAFCO the authority to consider and provide for the preservation of open space and agricultural lands. These types of lands are rated by soil quality and irrigation status by the California Department of Conservation (DOC). The DOC defines Prime Farmland as "irrigated land with the best combination of physical and chemical features able to sustain long term production of agricultural crops." Based on the DOC's Farmland Mapping and Monitoring Program, the majority of the EOAs and Target Areas are designated as Prime Farmland[1]. **Map 4** illustrates the prime farmland surrounding the City's jurisdictional and existing Sphere of Influence. As shown in Map 4, the City of Salinas is surrounded by rich soil, with the lands to the south and west of the City being the most productive. Subsequently, the City has in place an adopted Agricultural Land Preservation Program which contains measures to preserve agricultural lands to the south and west. This conservation approach is aligned with the existing Greater Salinas Area Memorandum of Understanding.

3. "LAFCO, in furtherance of its objectives of preserving prime agricultural land, containing urban sprawl, and in providing a reasonable assurance of a city/district's ability to provide services shall consider the appropriateness of phasing annexation proposals which include territory that is not within a city/district's urban service area and has an expected build-out over a period longer than five to seven years." [LAFCO Policies and Procedures, section D.VIII.1]

[1] Data retrieved from the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) which produces maps and statistical data used for analyzing impacts on California's agricultural resources.

4. "It is the policy of LAFCO to encourage and to seek to provide for planned, well-ordered, efficient urban development patterns while at the same time remaining cognizant of the need to give appropriate consideration to the preservation of open space and agricultural land within such patterns." [LAFCO Policies and Procedures, section D.IX.1]

5. "For annexations and Sphere of Influence applications, LAFCO shall consider as part of its decision whether the city in which the annexation or Sphere of Influence amendment is proposed has included certain goals, policies, and objectives into its General Plan that encourage mixed uses, mixed densities, and development patterns that will result in increased efficiency of land use, and that encourages and provides planned, well-ordered, efficient urban development patterns." [LAFCO Policies and Procedures, section D.XIII.1]

   A proposal may be denied if it fails to demonstrate to the satisfaction of LAFCO that it guides development or use of land for other than open-space uses away from existing prime agricultural lands in open-space use and toward areas containing nonprime agricultural lands and/or development of existing vacant or nonprime agricultural lands for urban uses within a local agency's existing jurisdiction or Sphere of Influence will occur prior to the development of existing open-space lands for non-open space uses which are outside of a local agency's existing jurisdiction or Sphere of Influence.

6. Regarding potential impacts to agricultural lands:
   a. "A Proposal must discuss how it balances the State interest in the preservation of open space and prime agricultural land against the need for orderly development." [LAFCO Policies and Procedures, section E.II.1]

   b. "A Proposal must discuss its effect on maintaining the physical and economic integrity of agricultural lands." [LAFCO Policies and Procedures, section E.II.2]

   c. "A Proposal must discuss whether it could reasonably be expected to induce, facilitate, or lead to the conversion of existing open-space land to uses other than open-space uses." [LAFCO Policies and Procedures, section E.II.3]

   The Draft EDE does include an action item (Action LU-1.7.4) requiring agricultural conservation easements, where feasible, to protect the most productive agricultural lands adjacent to EOAs outside the city's limits and sphere boundary. However, the action item does not address the conversion of prime agricultural land within the EOAs or Target Areas. Pursuant to state mandates, LAFCO must consider guiding such conversion away from prime agricultural land towards non-prime lands.

   Additionally, the following mitigation measures proposed in the Draft EIR should not be exclusive to the Target Areas but also the entire Future Development Areas:

   - Mitigation Measure (AG-1): mitigation shall include payment of an agricultural land conservation in-lieu fee in effect at the time individual projects are proposed within the Target Areas or dedication of a permanent conservation easement to a qualified third party farmland conservation entity on off-site agricultural land of equal or better quality at a ratio of 1:1.

   - Mitigation Measure (AG-2): To avoid conflict, one of the following mitigation options will be implemented by the City:

     1. Development defined as incompatible with a Williamson Act contract pursuant to Government Code Section 51201(e) will be prohibited within the portions of Target

Areas B and V that are under Williamson Act contract until the applicable Williamson Act contracts are terminated through cancellation or non-renewal; or

2. The boundaries of Target Areas B and V will be modified to exclude the acreage within a Williamson Act contract.; or

3. The portions of Target Areas B and V located on land within a Williamson Act contract will be removed from the Target Area. The equivalent acreage of land to be removed may be relocated to a different Target Area. A general plan amendment and additional CEQA compliance may be required for such a change.

- Mitigation Measure (AG-3): To avoid potential conflicts with a permanent agricultural conservation easement resulting from future development within Target Area B, one of the following mitigation options will be implemented by the City:

1. Development will be prohibited within parcels under permanent agricultural conservation easement; or

2. Coordinate with the Ag Land Trust to exchange the existing agricultural conservation easement with which development of Target Area B could be in conflict with one or more new conservation easements placed on agricultural land in an alternative location such that conflicts are eliminated.

7. Regarding jobs and housing:
   a. "Proposals must demonstrate through both quantitative and qualitative methods the relationship between the Proposal and the surplus or deficiency of local and county-wide housing supply and demand, and employment availability and creation." [LAFCO Policies and Procedures, section F.II]

The existing General Plan on page H-24 states that "The City will continue to work with the Monterey County Local Agency Formation Commission, Association of Monterey Bay Area Governments, and regional service providers to ensure that sufficient land for residential development is available, agricultural land is preserved, and appropriate infrastructure and services are available to meet the City's future housing needs." As previously mentioned, the Draft EDE is inconsistent with several General Plan Elements including the Housing Element.

   b. "Additionally, the Proposal must demonstrate how its pattern of land use and transportation complements local and regional objectives and goals for the improvement of air quality and reduction of greenhouse gas (GHG) emissions and local vehicle miles traveled (VMT)." [LAFCO Policies and Procedures, section F.II]

LAFCO requests that the Draft EIR address how the EDE does or does not conform to the full range of LAFCO's adopted policies and related State laws, as discussed above, 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.

We appreciate this opportunity to provide comments on the Draft EIR. 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

Attachments:
A) City of Salinas Proposed Economic Development Reserve Areas
B) Monterey County Regional Fire District Comment letter dated October 23, 2017

Maps:
1) Draft EDE's Proposed Future Development Areas
2) 2008 and 2010 Annexation and Sphere Expansion Areas
3) Direction of Future Growth Agreed Upon by the City and County per MOU
4) Prime Farmland Within Proposed Growth Areas
5) Proposed Annexation Areas Within City's Sphere of Influence

Attachment A
City of Salinas – Draft Economic Development Element
Overview of Proposed Future Development Areas

Proposed Future Development Areas Within Existing City Limits	Acres	Proposed Land Use	Includes Prime Farmland
A: Uni-Kool	259.35	Industrial	Yes
C: Airport Industrial Park	86.16	Industrial	No
E: Airport East/Hartnell	175.98	Business Park	Yes
H: East Future Growth Area*	838.60	Not Disclosed in DEIR	Yes
I: West/Central Future Growth Area	1,541.43	Not Disclosed in DEIR	Yes
O: Valley Center Corridor	145.49	Not Disclosed in DEIR	No
P: Vibrancy Plan Area	223.67	Not Disclosed in DEIR	No
Q: TOD Rail Infill	74.55	Not Disclosed in DEIR	No
R: Chinatown	29.17	Not Disclosed in DEIR	No
S: North Main Street	292.80	Not Disclosed in DEIR	No
T: Alisal Market Place	132.26	Not Disclosed in DEIR	No
U: East Alisal/East Market	309.82	Not Disclosed in DEIR	No
V: Carr Lake	989.89	Park, Retail	Yes
W: West Market	153.72	Not Disclosed in DEIR	Yes
X: Abbott	204.32	Not Disclosed in DEIR	No
Y: Lower Abbott	618.23	Not Disclosed in DEIR	No
Total Acreage	**6,075.44**	**41.3% of the entire future development areas**	
Proposed Future Development Areas Within Existing City SOI	**Acres**	**Proposed Land Use**	**Includes Prime Farmland**
D: Airport West	343.04	Industrial	Yes
G: Alisal/Airport East	395.63	Industrial	Yes
H: East Future Growth Area*	559.07	Not Disclosed in DEIR	Yes
M: Boronda South	208.00	Not Disclosed in DEIR	Yes
Total Acreage	**1,505.74**	**10.2% of the entire future development areas**	
Proposed Future Development Areas Outside Existing City Limits & SOI	**Acres**	**Proposed Land Use**	**Includes Prime Farmland**
B: Abbott Industrial Park	167.65	Industrial, Retail	Yes
F: Eastern Expressway	2,530.04	Retail	Yes
J: North Future Growth Area	2,155.76	Future Study Area	Yes
K: North Entrance	1,190.48	Business Park, Residential	Yes
L1: Westside Expressway	431.05	Retail	Yes
L2: Westside Expressway	378.61	Retail	Yes
N: Highway 68 Gateway	293.23	Business Park, Retail	Yes
Total Acreage	**7,146.82**	**48.5% of the entire future development areas**	
Total Acreage for Entire Proposed Future Development Areas	**14,728.00**		

**The western portion of EOA H is within the city limits, while the eastern portion is outside the city limits, but within the SOI*

Attachment B

MONTEREY COUNTY REGIONAL FIRE DISTRICT

19900 Portola Drive Salinas, California 93908 (831) 455-1828 FAX (831) 455-0646 www.mcrfd.org

October 23, 2017

Ms. Kate McKenna, Executive Officer
LAFCO of Monterey County
P O Box 1369, Salinas, CA 93902

Re: Draft Program Environmental Impact Report (EIR) for the Proposed City of Salinas Economic Development Element of the General Plan.

Dear Ms. McKenna:

The Monterey County Regional Fire District (MCRFD) has reviewed the Draft Program Environmental Impact Report (EIR) for the Proposed City of Salinas Economic Development Element of the General Plan for the City of Salinas and respectfully offers the following:

LAFCO Monterey County has prepared a letter in response to the City of Salinas Draft EIR. This includes some well-reasoned comments pertaining to the adverse effects the proposed annexations and subsequent detachments from the MCRFD could have pointing to the fact that the Draft EIR does not adequately analyze these effects.

Our main concern is that detachments from the MCRFD inevitably result in the loss of property tax dollars. As part of its review of any proposed annexations by the City of Salinas, or any neighboring jurisdiction, MCRFD requests LAFCO determine the loss or cumulative loss of property tax revenue and its effect on the level of service provided by our District. We also request a "seat at the table" during the negotiation of any tax transfer agreements between Monterey County and the annexing jurisdiction.

In addition, LAFCO and the City of Salinas will need to evaluate the impact to the District in terms of increased service demands caused by regional area growth into our District as inevitably the acquiring entity will call upon our District for assistance with their newly-assimilated area of responsibility.

The District continues to forecast fiscal constraints with regard to annexations and detachments through issues such as: In the late 1970's and early 1980's areas were annexed into the District (Chualar Rural Fire) with no portion of the property tax base provided to the District. Currently with annexations the County will only allow a portion of growth to be shared with the District but none of the base.

It is in the interest of our constituents to ensure that the MCRFD does not continue to lose tax revenue through detachments at full value while receiving land through annexations with only growth applied and none of the existing tax base. This will continue to degrade the financial stability of the District with an inevitably deleterious effect on our ability to provide the very best fire protection to unincorporated areas of Monterey County.

We would also call to your attention Section 7 of the "Master Tax Transfer upon Annexation" agreement between the City of Salinas and Monterey County (Salinas City Council Resolution #19423, approved April 8, 2008/Monterey County Board of Supervisors Resolution #80-249, passed April 9, 2008). This agreement remains in effect until January 1, 2023. Please note the agreement requires that both entities meet and confer on possible continuation or amendment of its terms **no later than January 1, 2018**, and provide notice of such meetings to the MCRFD. Excerpt below:

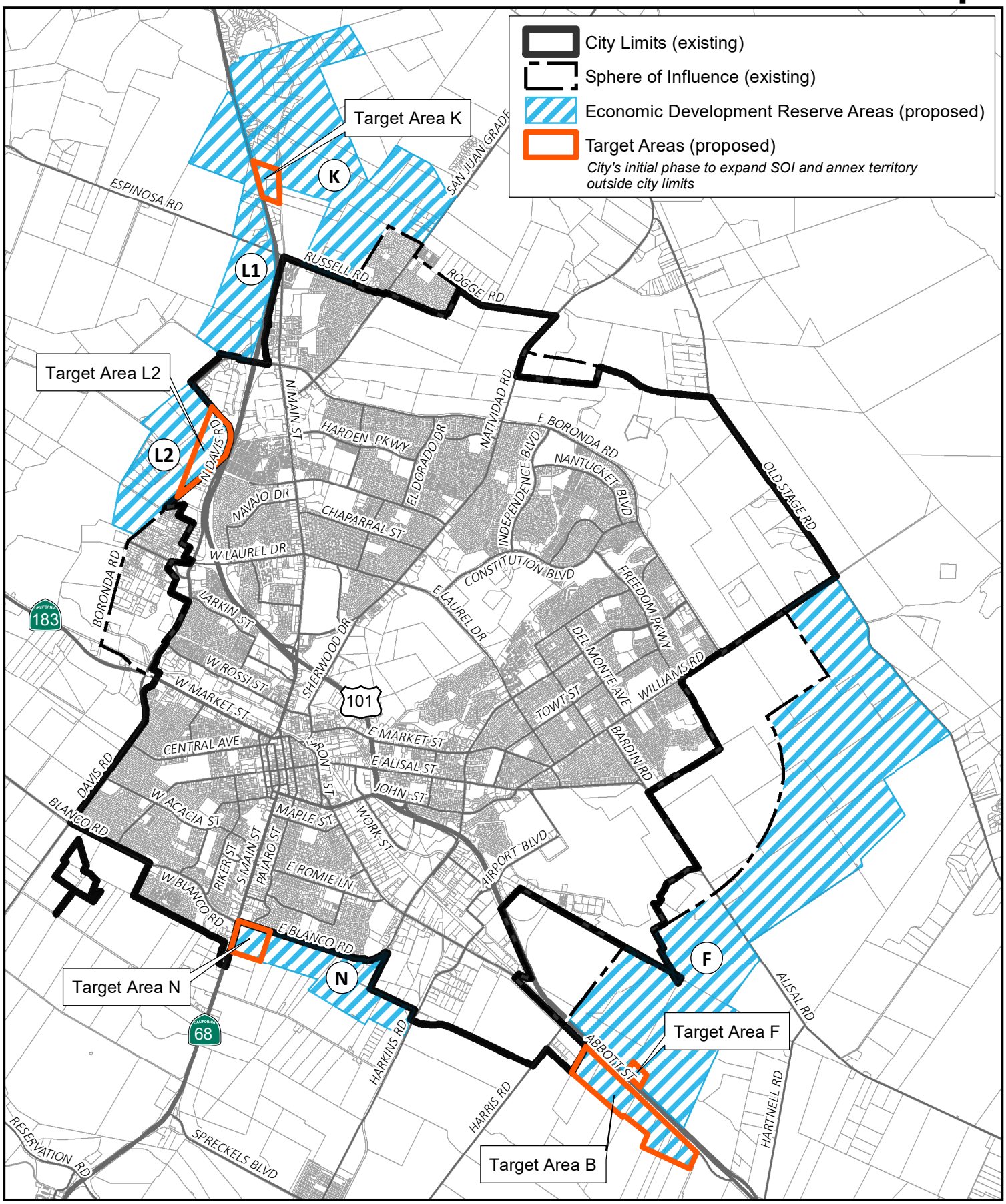
> *"No later than Jan 1, 2018, the (Salinas) City and (Monterey) County shall meet and confer on the possible continuation or amendment of the terms of this agreement. Notice of such meeting(s) shall be provided to the (MCRFD) District."*

We appreciate the opportunity to provide comment on the Draft Program EIR for the Proposed City of Salinas Economic Development Element of the General Plan, and look forward to working with LAFCO to ensure fair and equitable tax revenue sharing as well as other annexation-related issues.

Sincerely,

Warren "Pete" Poitras, Board President
Monterey County Regional Fire District

Map 1



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

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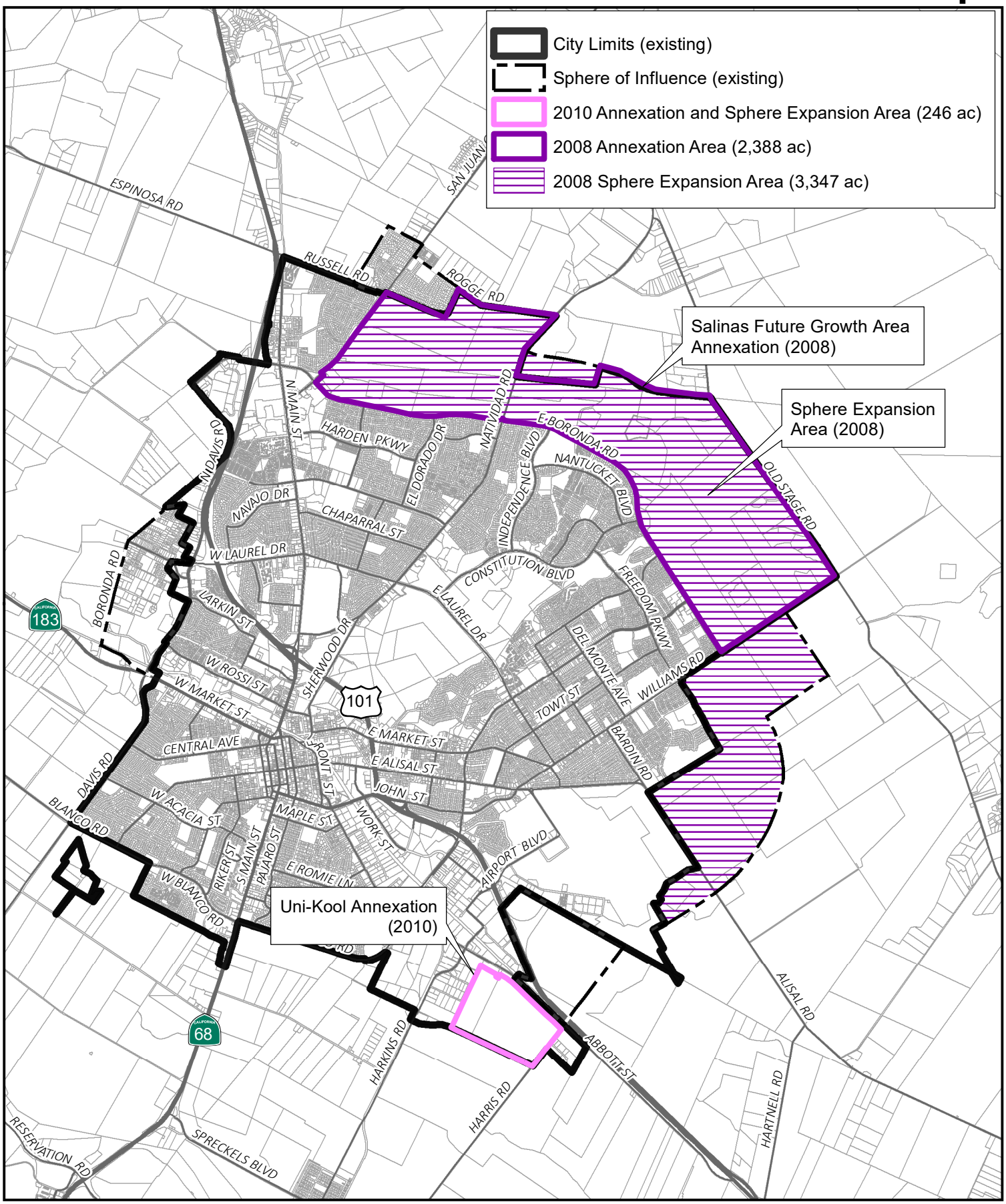
Miles

CITY OF SALINAS

Proposed Growth Areas Outside
Existing City Limits and Sphere of Influence

Map Prepared: 10/13/2017

Map 2



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Telephone (831) 754-5838

132 W. Gabilan St., Suite 102
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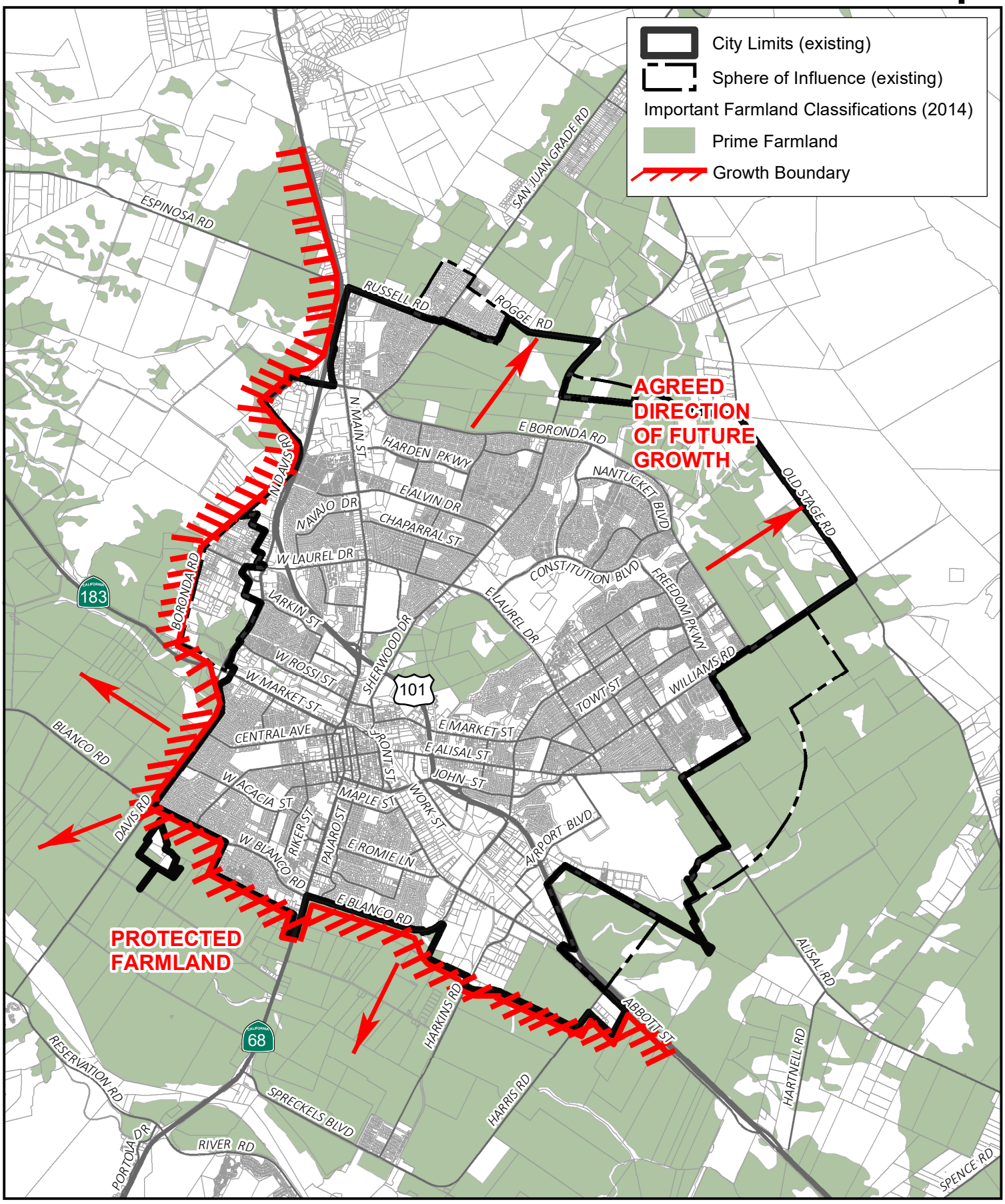
CITY OF SALINAS

2008 & 2010 Annexation and Sphere Expansion Areas

Map Prepared: 10/13/2017

Map 3



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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

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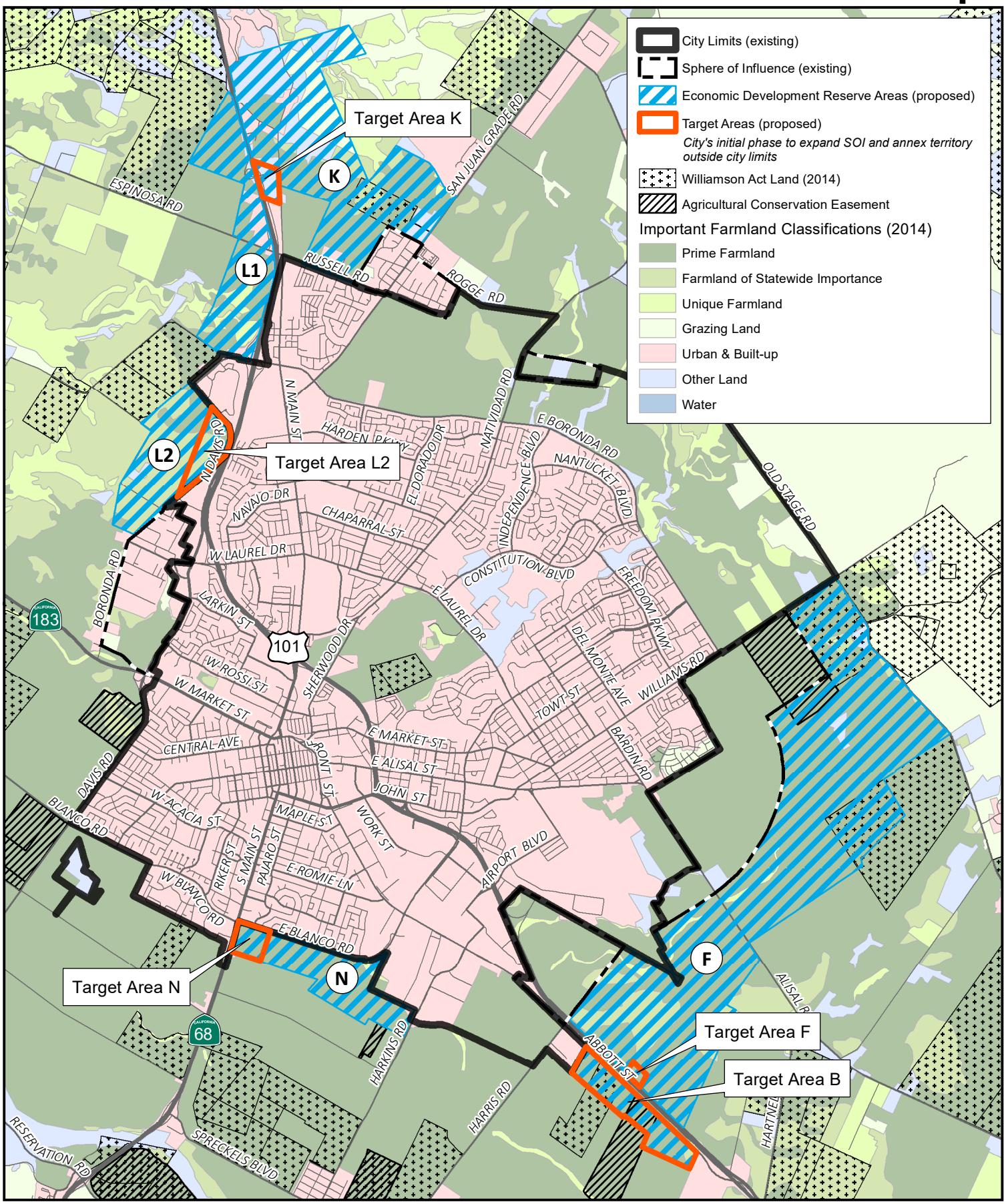
CITY OF SALINAS

Greater Salinas Area
Memorandum of Understanding
Adopted by the City and County (2006)

Map Prepared: 10/13/2017

Map 4



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

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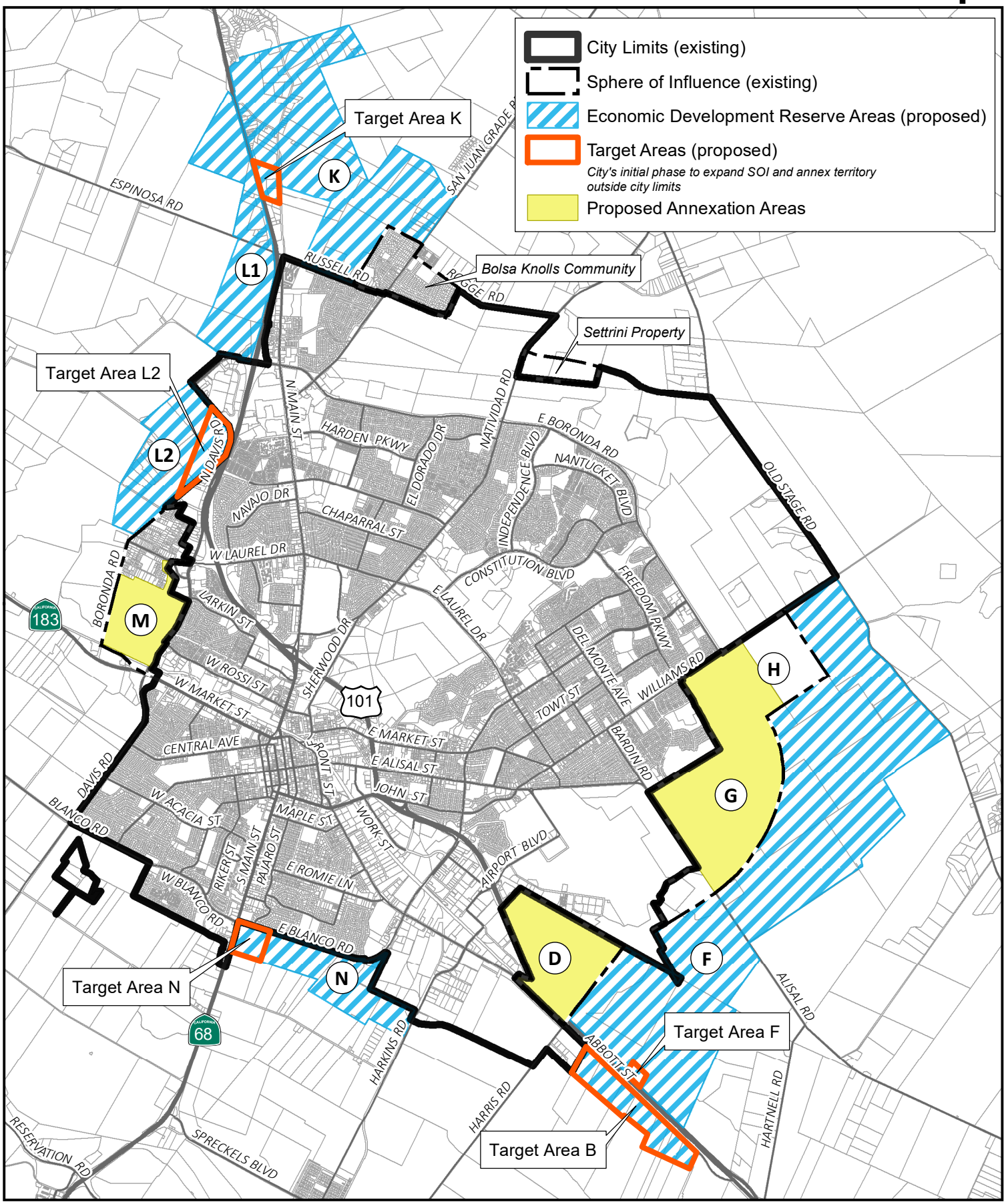
Miles

CITY OF SALINAS

Prime Farmland Within Proposed Growth Areas

Map Prepared: 10/13/2017

Map 5



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CITY OF SALINAS

Proposed Annexation Areas
Within City's Sphere of Influence

Map Prepared: 10/13/2017