

MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY

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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,

A handwritten signature in blue ink, appearing to read "Jacqueline R. Onciano", with a long horizontal flourish extending to the right.

Jacqueline R. Onciano
RMA Chief of Planning

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