



**Testimony on Final Program Environmental Impact Report of
Salinas' Proposed Economic Development Element**

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Good afternoon. My name is Michael DeLapa. I'm the Executive Director of LandWatch Monterey County. Founded in 1997, LandWatch is a nonprofit, land conservation and planning organization representing more than 1000 residents of Monterey County.

I am here today to urge you to reject the Economic Development Element because it puts Salinas on a path to paving over prime farmland all around the City, expanding far beyond what makes economic or environmental sense, and destroying the vibrancy of the city core just as you're launching efforts to revitalize it.

I also urge you to reject the Final Program Environmental Impact Report based on LandWatch's extensive comments. The deficiencies we've identified in the Draft EIR cannot be corrected in the Final EIR. To comply with CEQA, the City must revise and recirculate a Draft EIR that includes an objective analysis of an infill alternative, one that takes into account accurate job projections over a realistic planning horizon - not the 50-year horizon used in the Draft EIR. The revised EIR should also analyze the amount of urban decay and job loss that will occur as a result of sprawl. An "infill" alternative should incorporate policies that would encourage economic and residential growth within the existing Sphere of Influence.

The Salinas Economic Development Element proposes suburban sprawl on a scale that has never been seen in Monterey County. Even under the most aggressive economic scenario imaginable, the amount of land that the EDE proposes is far beyond what is reasonable or needed. As the Local Agency Formation Commission points out in its letter to the City:

Consisting of over 14,700 acres, the proposed growth areas would significantly expand the City's boundaries in all directions. Nearly 50% of the future growth would take place

outside the existing City limits and 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 [Emphasis added]**

LAFCO goes on to cite chapter and verse the state laws, LAFCO policies, general plan policies, and legal agreements that the EDE violates.

I draw your attention to two of LAFCO's maps, numbers 4 and 5, so you can get an idea of the magnitude of "future development areas" the City is proposing.

In addition to concerns with substance, LandWatch is concerned with process. The City released the final EIR less than a month after the close of the draft EIR comment period! That's not a lot of time to seriously address the hundreds of objections that LandWatch and others posed to the draft EIR. Without a comprehensive and fact-based analysis of the objections, Salinas risks lawsuits and associated costs for years to come.

I also want to bring to your attention the economic value the City creates when it changes land use. The prime farmland on the City's outskirts is currently worth \$60,000 to \$70,000 per acre. Once the farmland is rezoned "industrial" or "commercial" it's worth \$250,000 to \$400,000 per acre — 4 to 7 times more. When you rezone, the City gives that wealth to a private party and hopes that at some point it captures it as jobs and taxes. That's a terrible deal.

In sum, I ask that you:

1. Reject the Final EIR
2. Recommend to the City Council that it develop an economic element that is more reasonable in scale and consistent with local and state laws.
3. Conduct a comprehensive infill analysis, which LandWatch would be happy to assist with.
4. Consider how the City can capture some of the wealth that it gives away when it annexes and rezones farmland, if and when that becomes necessary.