November 30, 2015

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

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

Dear Ms. Hullinger:

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

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

   A. A compact growth alternative that would include re-designating for commercial or industrial use some of the vacant land that is currently designated for residential use in order to minimize or avoid impacts associated with sprawl such as the loss of agricultural land and increased vehicle miles traveled (VMT).

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

2. The DEIR should include the following information about baseline conditions:

   A. A summary table identifying the amount of vacant land and its land use designation within the City boundaries and existing Sphere of Influence. The DEIR should also identify the amount of acreage by area proposed for annexation.
B. Identification of existing vacant buildings within downtown and central city areas. Additionally, it should identify approved and unconstructed commercial and industrial projects such as the Uni-Kool Ag Industrial Center.

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

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

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

Thank you for the opportunity to comment on the NOP.

Sincerely,

Amy L. White
Executive Director