



April 11, 2019

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Subject: DEIR for Salinas' West Area Specific Plan

Dear Ms. Miller:

As currently proposed, Salinas' West Area Specific Plan is a case study in urban sprawl. The plan proposes developing approximately 797 acres of annexed farmland with up to 4,340 residential dwelling units, up to 571,500 square feet of commercial/mixed use building area, and up to 177 acres of public facilities. Average residential density is 9 units per acre, which favors large expensive single family homes over apartments and homes designed for affordability. By favoring cars rather than walking and biking, low density also generates significant greenhouse gas emissions.

LandWatch urges a more sustainable planning approach. The Draft EIR offers an improved Reduced Land Area (RLA) Project alternative. Under the RLA alternative the average residential density (units per net acre) would increase from 9.0 to approximately 11.3 units – a modest improvement that would conserve agricultural land, lower housing prices, and lead to more economically and environmentally sustainable outcomes.

With that perspective, LandWatch Monterey County offers the following comments on the Draft Environmental Impact Report for Salinas' West Area Specific Plan.

Project Description

The West Area Specific Plan establishes the land use planning and regulatory guidance for approximately 797 acres. It is anticipated the Specific Plan Area will house up to 15,928 residents at project build-out. Buildout is expected in 2040. The project area was annexed to the City of Salinas in 2008.

Data on the number and types of residential units were found in the Air Quality analysis. The Plan assumes 1,351 single family dwelling units on 441.88 acres with a population of 3,892 people; 91 apartments on 2.39 acres with a population of 260 people; and 2,888 condominium/townhouse units on 180.5 acres with a population of 8,260 people. (DEIR, Appendix B).

If these unit count and acreage data assumptions are incorrect, please identify assumptions regarding number of units by residential type per acre.

The acres reported by Appendix B for residential uses (totaling 624.77 acres) are greater than the net residential acres listed in Table 2-1 (totaling 480.55 acres). The DEIR states that "net

residential acres” are “private lands zoned for residential uses exclusive of streets, parks, and all other uses.” (DEIR, p. 2.0-11.) We note that Appendix B and DEIR Table 2-2 list 50 acres for parks separately, implying that the Appendix B residential acreage does not include parks. Please explain and provide the calculations used to determine the “net residential acres,” the “planning area net acres,” and the “net acres” in Tables 2-1 and 2-2. For example, what uses and acreage were subtracted from the acreage set out in Appendix B to obtain “net residential acres?” We seek to understand how to calculate “net developable residential acres” (DEIR, p. 2.0-9) and “net residential acres” (DEIR, pp. 2.0-14 to 2.0-15) from acres set out in the CalEEMod runs in Appendix B.

Consistency with the Salinas General Plan

The Salinas General Plan mandates that new residential development have a minimum average density of 9 dwelling units per net developable residential acre with 15% to 25% of residential units at a density of 16-24 units per acre and 34% to 45% with a density at 7-14 units per acre. (DEIR p. 2.0-9). As noted above, the project residential density averages 9 units per acre, only nominally meeting General Plan requirements. This contrasts with the Reduced Land Use Area Project Alternative, which increases density to 11.3 units per acre.

Air Quality

The DEIR finds the project would have significant and unavoidable impacts on ozone levels both at the project level and cumulatively. Impacts are mainly due to motor vehicle emissions. Proposed mitigation measures do not address increasing project density, which would mitigate air quality impacts by reducing motor vehicle emissions. For example, single family dwelling units generate 9.52 daily trips in contrast to condos which generate 5.81 daily trips, a 40% reduction in daily trips (ITE, 9th edition). Mid-rise apartments generate even fewer trips at 4.20 daily trips.

Increased density (i.e., increased residential units/acre) should be identified as a mitigation measure.

Greenhouse Gas Emissions

Because other specific mitigation measures identified in the DEIR would not reduce impacts to less than significant, Mitigation Measure 3.4-1 would require applicants to prepare Greenhouse Gas Reduction Plans (GGRPs) prior to the approval of the tentative maps and development review permits. The GGRPs would be aimed at achieving per-capita-based specific performance standards through implementation of on-site measures. Off-site measures, including purchase of offsets, would only be considered if sufficient onsite measures were unable to attain performance standards. If sufficient feasible reduction measures included in the GGRPs were unavailable to reduce GHG emissions to below the threshold of significance, the project applicant would be required to include evidence in the Plan to this effect. Implementation of Mitigation Measure 3.4-1 would not be required if the City has a qualified GHG reduction plan in place on the date a future individual project application is deemed complete. (DEIR p. 3.4-37).

Because it is possible that individual projects within the Plan Area may not achieve GHG reductions needed for their individual impacts to be less than significant, the DEIR finds that implementation of the Specific Plan would have a cumulatively considerable contribution and significant and unavoidable impact to GHGs. (DEIR p. 3.4-49)

Increasing residential unit density is a feasible on-site mitigation method that would help attain the per capita-based performance standard. As identified in comments regarding air quality, increased density should be identified as a mitigation measure.

Utilities – Water Supply

The estimated 4,320 AFY groundwater pumping for existing agricultural use in the West Area Specific Plan is 2,947 AFY more than the total buildout estimated demand for the West Area Specific Plan, which is 1,373 AFY.

The project proposes to construct three new wells, each with a minimum capacity of 1.72 million gallons per day (mgd) to meet a maximum day demand at full plan development of 2,257.6-acre feet/year (AFY). Two wells would be in operation and one well would be in reserve as a backup (this capacity greatly exceeds the projected demand of the Specific Plan of approximately 1,373 AFY, as provided in greater detail below). (DEIR p.2.0-18)

Water Impacts – Setting Description

The 2019 DEIR relies on the out-of-date 2015 West Area Specific Plan Salinas California SB610 Water Supply Assessment and the out-of-date 2015 Cal Water Salinas District Urban Water Management Plan (UWMP). The most recent groundwater reports show substantial increase in the areas subject to seawater intrusion, which the DEIR fails to acknowledge. (See MCWRA, 2017 Salinas Valley Groundwater level contours and Seawater intrusion Maps, available at <http://www.co.monterey.ca.us/home/showdocument?id=63777>.) In response to this new information, MCWRA staff issued *Recommendations to Address Expansion of Seawater Intrusion in the Salinas Valley Groundwater Basin*, Special Reports Series 17-01, dated October 2017. (Available at <https://www.co.monterey.ca.us/home/showdocument?id=57394>.) MCWRA recommended moratoria on new wells in a defined Area of Impact, an expansion of the Castroville Seawater Intrusion Project (CSIP) Service Area, termination of pumping from the Area of Impact, certain well destructions, and a moratorium on new wells in the Deep Aquifer pending a study of its viability as a groundwater source. The proposed moratoria would exempt municipal supply wells but not agricultural wells.

Please update the setting description to reflect the most recently available data and analysis for the Salinas Valley.

Please explain whether the project would draw water from wells in the Area of Impact identified in MCWRA's *Recommendations to Address Expansion of Seawater Intrusion in the Salinas Valley Groundwater Basin*.

The DEIR identifies the Salinas Valley Water Project Phase II (SVWP Phase II) as a “Current/Planned Water Project to Reduce Groundwater Overdraft.” (DEIR, pp. 3.11-27 to 3.11-28.) MCWRA issued a Notice of Preparation for an EIR for the project on June 25, 2014. (See MCWRA websites at <http://www.co.monterey.ca.us/government/government-links/water-resources-agency/projects-facilities/salinas-valley-water-project-phase-ii#wra>; <http://www.co.monterey.ca.us/government/government-links/water-resources-agency/projects-facilities/background#wra>; <http://www.co.monterey.ca.us/government/government-links/water-resources-agency/projects-facilities/salinas-valley-water-project-phase-ii/project-status#wra>; <http://www.co.monterey.ca.us/home/showdocument?id=2425>.) MCWRA has explained that a Settlement Agreement amending Water Right Permit #11043 requires MCWRA to meet “a series of milestones . . . in order to demonstrate progress toward implementation of the Salinas Valley Water Project, Phase II.” (see MCWRA website at <http://www.co.monterey.ca.us/government/government-links/water-resources-agency/projects-facilities/background#wra>; SWRCB Order WR 2013-0030-EXEC, Order Approving Settlement Agreement and Partial Revocation, August 7, 2013, available at <http://www.co.monterey.ca.us/home/showdocument?id=24248>.) In the five years since issuing the 2014 NOP, MCWRA has not issued an EIR for the SVWP Phase II; and there is no evidence that MCWRA has met any of the SWRCB's milestones since 2014. The SVWP Phase II is not funded, and MCWRA acknowledges that it does not have adequate funding.

Please correct the misleading impression that the SVWP Phase II represents a foreseeable part of the solution to Basin overdraft.

Water Impacts – Project Level

The DEIR concludes the project would have a less than significant project level impact on the Salinas Valley Basin groundwater:

Water supplies are sufficient to meet the City's existing and projected future potable water demands, including those future water demands associated with the West Area Specific Plan, to the year 2035 under all hydrologic conditions. ... Moreover, the development of the West Area Specific Plan would reduce consumption of groundwater (equivalent to increasing groundwater storage), when compared to the existing agricultural uses; this would also have the effect of reducing the potential for seawater intrusion into the groundwater basin, when compared to the existing agricultural uses. Therefore, overall, buildout of the West Area Specific Plan would result in a less than significant impact relative to this topic. (DEIR p. 3.11-41)

A project-specific Water Supply Assessment (WSA) has been prepared to evaluate the City's current and future water demands (including those of the Plan Area) against water supplies to ensure that adequate water is, or will be, available to accommodate the West Area Specific Plan. This WSA was prepared in December 2015 (see West Area Specific Plan Salinas California SB610 Water Supply Assessment). This report feeds into the update to the Cal Water Salinas District Urban Water Management Plan (UWMP), in its 2015 Update). The studies conclude that adequate water supplies are available to serve the West Area Specific Plan. However, the DEIR notes that the overdraft of the Salinas Valley Groundwater Basin is approximately 45,300 acre-feet per year in non-drought years. (DEIR 3.6-4).

While the project would use less water than current uses, it would continue to draw groundwater from a critically overdrafted groundwater basin. Because the basin continues to be severely overdrafted with no identified projects to reverse the trend, the City should find that water supplies are not sufficient to meet the projected water demand associated with the proposed project in addition to the existing and planned future uses.

The DEIR devotes two sentences to the Salinas Valley Basin Groundwater Sustainability Agency. (DEIR p. 3.11-35.) Yet it is this agency that is currently preparing plans to bring the critically overdrafted 180/400 foot sub-basin into sustainability with a plan due in 2020. While specific projects to address seawater intrusion have not been identified, broad categories of projects to reduce groundwater pumping are under consideration, including the fallowing of agricultural land. The EIR should acknowledge that, even though the proposed project would reduce groundwater pumping because it would replace agriculture with land uses with lower water demands, urban land uses cannot be followed.

The DEIR's comparison of a water supply used by agriculture and housing does not reflect the actual impact of committing a water supply to housing. Agricultural water demand is seasonal and can be discontinued if water is not available for some period or not available permanently. Unlike the use of water for agriculture, the use of water for housing requires a permanent commitment to protect the substantial capital investment for housing. Thus, for example, MCWRA has recommended exempting municipal supply wells from the proposed moratoria on pumping in the 400-foot and Deep Aquifers.

Groundwater supplies may be cut back in the future to address the currently unsustainable state of groundwater pumping in the Basin. The County, MCWRA, and the SVGBGSA all have the authority to order such cutbacks in the use of groundwater. And in fact, the County has recently ordered certain moratoriums on groundwater use. Those moratoriums have exempted water used for municipal supply purposes and have thus disproportionately targeted agricultural and

industrial uses. As part of the mandated Sustainable Groundwater Plan, SGMA would require cutbacks in groundwater use if there were no other methods available to attain a sustainable basin. **Currently, there are no funded, approved groundwater management projects that have the potential to prevent seawater intrusion and overdraft conditions, so cutbacks are the only certain means of SGMA compliance.**

Thus, the commitment of groundwater that is now used for agriculture on an interruptible basis to be used instead for housing on a non-interruptible basis will limit the options for the future groundwater management. In short, diversion of groundwater to housing may deny groundwater to agriculture. As discussed above, unlike agricultural wells, municipal supply wells may be exempted from existing and future moratoriums on groundwater pumping, as MCWRA has already recommended. Because of this likelihood, the EIR must acknowledge that the replacement of interruptible water demand with uninterruptible demand is a significant impact, even if the urban demand is less than the displaced agricultural demand.

Please evaluate the effect on competing uses, including agricultural uses and industrial uses, of committing a non-interruptible supply of water for the proposed housing.

Water Supply-Cumulative Impacts

The DEIR finds the project would not have a significant and unavoidable cumulative impact on the groundwater basin:

There would be sufficient water resources available to provide supply for buildout of the cumulative scenario, so that no significant cumulative effect on the overall water supply would result. Therefore, this would result in a less than significant cumulative impact and a less than cumulatively considerable impact on water utilities. (DEIR p. 3.11-431)

The DEIR cumulative water supply impact analysis assumes, 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 indicate that displacement of agricultural use by urbanization causes conversion of additional habitat land to provide replacement farmland. For example, the 2010 Monterey County General Plan EIR projects that 10,253 acres of farmland will be added to the SVGB by conversion of previously uncultivated land available in the SVGB. (Final EIR, Monterey County General Plan, March 2010, p. 2-36, available at <http://co.monterey.ca.us/home/showdocument?id=45384>.) That analysis assumed that 2,571 acres of farmland would be lost to urbanization within the unincorporated area of the county during the life of the County General Plan. (Draft EIR, Monterey County General Plan, September 2008, p. 4.2-12, available at <http://co.monterey.ca.us/home/showdocument?id=43988>.) The West Area Specific Plan DEIR acknowledges that for every acre of agricultural land converted to urban uses, ten acres of previously unirrigated land (e.g., range land or open space land) have been converted to agricultural use. (DEIR, p. 3.11-42.) It is clear that conversion of land for new cultivation within the Salinas Valley Groundwater Basin exceeds the loss of agricultural land to urbanization. The evidence is that there is a continuing demand for new irrigated land in the Salinas Valley.

Accordingly, the conversion of the project site to urban uses, displacing existing agricultural use, could accelerate conversions of previously uncultivated land for agriculture, with the net effect of an increase in cumulative water demand from the Salinas Valley Groundwater Basin, **even if the demand at the newly urbanized site declines. Thus, there is no basis to assume that the project's new water use will not increase overall water use in the Salinas Valley in light of**

the evidence that demand for agricultural land use is increasing and that displaced agricultural land is being replaced by conversion of other areas in the Valley to irrigated agriculture.

Please evaluate the effect on the demand for additional agricultural land conversions within the Salinas Valley Groundwater Basin caused by displacing the existing agricultural use from the project site.

Please estimate the water demand from new agricultural conversions that are attributable to this displacement.

Transportation

Under Cumulative Plus Project with Central Area Specific Plan conditions, implementation of the proposed Specific Plan may conflict with the transportation performance measures established by the City of Salinas, Monterey County, and Caltrans. Because implementation of the West Area Specific Plan under cumulative conditions would cause significant and unavoidable impacts to some facilities, implementation of the proposed project would make a cumulatively considerable contribution to significant traffic impacts. (DEIR p. 4.0-27).

The proposed project is estimated to generate a total of approximately 221,017 average daily vehicle miles travelled (Average Daily VMT) at project buildout. (DEIR 3.4-46). Under the CEQA requirements for traffic analysis to be implemented by July 1, 2020, projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. Please address the project's impact on transportation based on this criterion. Again, we note that increased residential unit density per acre would reduce VMT.

Project Alternatives

The following alternatives are evaluated in the DEIR:

- No Project (No Build) Alternative
- Reduced Land Area Project Alternative - Under this alternative, approximately 162 acres of land in the northeast corner of the Plan Area would be removed. The proposed land uses within this area identified for removal under this alternative would be incorporated into the remaining 635 acres of the Plan Area, which would increase the residential density of the Plan Area under this alternative, while retaining the same number of residences, mixed use commercial areas, schools, parks, etc. as the proposed project. Under this alternative the average residential density (units per net acre) would increase from 9.0 to approximately 11.3 units/acre. (DEIR p.5.0-6)
- Reduced Residential Intensity/Density Project Alternative - Under this alternative, the Plan Area would be developed with a reduction in the overall residential intensity/density while maintaining the approximate overall project footprint. For the purposes of discussion, this option considers a 25 percent reduction in the intensity/density of the residential components of the project while maintaining the approximately 797-acre project footprint. This would result in fewer residential lots, but larger lot sizes. This alternative would result in up to 3,255 residential units. Under this alternative, the average residential density (units per net acre) would decrease from 9.0 to approximately 6.8 units/acre. (DEIR p.5.0-6)
- Smaller-Scale Project Alternative-Under this alternative, the Plan Area would be reduced by approximately 33 percent and the proposed residential and non-residential uses would also be reduced by approximately 33 percent. The resultant Plan Area under this alternative would

be approximately 533 acres in size, and include up to 2,908 residential units, up to 382,905 square feet of commercial/mixed use building area, and up to 119 acres of public facilities (including two elementary schools, a high school, a middle school, open space (including supplemental detention/retention basins) and up to 8 parks). The number of residential units under this alternative would not meet the minimum of 3,553 residential units as provided within the City of Salinas General Plan. The residential densities under this alternative would be similar to the proposed Project. (DEIR p.5.0-7)

Reduced Land Area Project Alternative

The DEIR purports to provide conclusions regarding the Reduced Land Area Project alternative (RLA Alternative) in Table 5.0-1 (Ability of Alternatives to Meet Proposed Project Objectives) and Table 5.0-10 (Comparison of Alternative Project Impacts to the West Area Specific Plan). The Tables contain unexplained and apparently erroneous conclusions.

Public Services And Infrastructure Objective: Table 5.0-1 indicates without any explanation that the RLA Alternative would not “Provide public services and infrastructure improvements that achieve and maintain City service standards.” Please indicate in what respect the RLA Alternative would fail to meet this objective. Which service standards would not be met by the RLA Alternative and why? We note that the DEIR states that the RLA Alternative would result in development of public facilities, such as schools and parks, and would be required to pay public safety impact fees. (DEIR, p. 5.0-25.)

Table 5.0--1 does not indicate whether the West Area Specific Plan would *itself* meet this objective. Please indicate whether the West Area Specific Plan would itself meet this objective.

Table 5.0-1 does not provide any explanation as to whether the RLA Alternative would *better* meet this objective than the West Area Specific Plan. Please indicate whether the RLA Alternative or the West Area Specific Plan would better meet this objective and why. We note that the DEIR states that the RLA Alternative “would have a slightly reduced impact to public services when compared to the proposed project” (DEIR, p. 5.0-25) and “the demand for utilities would be reduced under this alternative when compared to the proposed project” (DEIR, p. 5.0-26).

Interconnected Pathway Objective: Table 5.0-1 indicates without any explanation that the RLA Alternative would not “Establish an interconnected sidewalk/pathway and open space system throughout the development which links to the greater FGA and City as a whole.” Please indicate in what respect the RLA would fail to meet this objective. Note that the discussion of the RLA Alternative states that it would provide “greater opportunities for non-motorized transportation choices (such as walking or cycling).” (DEIR, p. 5-0-18, emphasis added.)

Table 5.0--1 does not indicate whether the West Area Specific Plan would *itself* meet this objective. Please indicate whether the West Area Specific Plan would itself meet this objective. Table 5.0-1 does not provide any explanation as to whether the RLA Alternative would *better* meet this objective than the West Area Specific Plan. Please indicate whether the RLA Alternative or the West Area Specific Plan would better meet this objective and why.

Air Quality Impacts: Table 5.0-10 indicates that the RLA Alternative would have “greater” impacts with respect to AQ Impact 3.1-1, which is identified as “the potential to conflict with or obstruct implementation of the applicable air quality plan.” This determination is unexplained and inconsistent with the determination in Table 5.0-10 and in the discussion section that in all other respects the RLA Alternative would have slightly less air quality impacts due to its more compact development size and reduction in mobile source emissions, the predominant source of air quality impacts. (DEIR, pp. 5.0-16 to 5.0-18.) Please explain how the RLA Alternative could have “greater impacts” with respect to AQ Impact 3.1-1 than the West Area Specific Plan.

The DEIR identifies AQ Impact 3.1-1 as less than significant for the West Area Specific Plan. Please explain whether AQ Impact 3.1-1 would also be less than significant for the RLA Alternative.

Hydrological Impacts: Table 5.0-10 indicates that the RLA Alternative would have “slightly greater” impact with respect to HYD Impact 3.6-3, which is identified as the “potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge.” Table 5.0-10 indicates that the RLA Alternative would have a “slightly greater” impact with respect to HYD Impact 3.6-10, which is identified as “Cumulative impacts related to degradation of groundwater supply or recharge.” These determinations appear to be founded on the discussion that concludes that the areas “not to be developed would remain under agricultural production” and would “continue to require intensive groundwater pumping for the agricultural production.” (DEIR, p. 5.0-23.) This analysis is inconsistent with the impact analysis used elsewhere in the DEIR, which considers only the difference in the water use for urban and agricultural uses *in the area to be developed*. Indeed, the RLA Alternative description states that “162 acres in the northeast corner of the plan Area would be removed.” (DEIR, p. 5.0-17.) Because the 162 acres would not be part of the RLA Alternative it is improper to charge the RLA Alternative with the water that would be used in that area for purposes that are not part of the project.

Furthermore, the comparison of hydrological impacts of the RLA Alternative and the West Area Specific Plan omits any consideration of two critical differences. First, as the DEIR admits, the RLA Alternative “would have a greater chance of groundwater recharge because it would reduce the amount of impervious surfaces by 20 percent as compared to the West Area Specific Plan.” Second, the DEIR fails to assess the reduction in per-unit water use for denser residential development. Multi-family residential use and smaller single-family lots uses less water. Please estimate the reduction in per-unit and overall water use attributable to increased recharge and denser residential development in the RLA Alternative compared to the West Area Specific Plan.

Population And Housing Impacts: Table 5.0-10 indicates that the RLA Alternative would have “greater” impact with respect to POP Impact 3.8-1, which is identified as the “potential to induce substantial population growth in an area.” Table 5.0-10 indicates that the RLA Alternative would have a “greater” impact with respect to POP Impact 3.8-2, which is identified as “Cumulative impact on the potential to induce substantial population growth in an area.” These determinations are based on the erroneous statement in the discussion section that under the RLA Alternative “fewer units would be build” and the City would have to look to other undeveloped areas to accommodate the demand that would have been met by the West Area Specific Plan. (DEIR, p. 5.0-24.) This is not true. The RLA Alternative is described as increasing the residential density from 9 to 11.3 units per acre by reducing the footprint 20% “while retaining the same number of residences, mixed use commercial areas, schools, parks, etc. as the proposed project.”¹ (DEIR, p. 5.0-6, emphasis added.) Please correct the erroneous determination that the RLA Alternative would have greater population and housing impacts which is founded on a mischaracterization of the RLA Alternative.

Transportation Impacts: Table 5.0-10 indicates that the RLA Alternative would have “slightly greater” impact with respect to TC Impact 3.10-7, which is identified as “impacts related to emergency access.” There is no apparent basis for this determination. The discussion section states that the RLA Alternative would have less of an overall traffic impact than the proposed project. Please explain the basis for the determination that the RLA Alternative would have “slightly greater” impact with respect to TC Impact 3.10-7.

The DEIR identifies TC Impact 3.10-7 as less than significant for the West Area Specific Plan. Please explain whether TC Impact 3.10-7 would also be less than significant for the RLA Alternative.

¹ If the RLA Alternative does not in fact retain the same number of residential units, then a reduced area alternative that does retain the same number of units should be evaluated.

Table 5.0-10 indicates that the RLA Alternative would have a “slightly greater” impact with respect to TC Impact 3.10-8, which is identified as “conflict with adopted multi-modal circulation policies, plans, or programs” or a “decrease [in] the performance or safety of public transit, bicycle, or pedestrian facilities.” There is no apparent basis for this determination. The discussion section states that the RLA Alternative would have less of an overall traffic impact than the proposed project. Furthermore, it states that the more compact development of the RLA Alternative would provide “greater opportunities for non-motorized transportation choices (such as walking or cycling),” i.e., *greater opportunity for multi-modal circulation*. (DEIR, p. 5.0-18.) Please explain the basis for the determination that the RLA Alternative would have “slightly greater” impact with respect to TC Impact 3.10-8.

Loss of Agricultural Land: As this project’s DEIR acknowledges, the Salinas General Plan EIR acknowledges that there is a significant and unavoidable impact related to the loss of important farmland. (DEIR, p. 1.0-16.) The mitigation required by the General Plan EIR and by regulation will not render this impact less than significant for this project. However, the adoption of the RLA Alternative will serve to substantially reduce this significant impact by reducing the loss of agricultural land by 20%. This DEIR’s alternatives analysis should identify the reduction in this significant impact to agricultural land as a benefit of the RLA Alternative compared to the proposed West Area Specific Plan.

Environmentally Superior Alternatives.

The Smaller-Scale Project Alternative is identified as the Environmentally Superior Alternative even though it does not meet the number of residential units as provided in the Salinas General Plan. (DEIR 5.0-45.) However, the Reduced Land Area Alternative meets all the same project objectives as the Smaller-Scale alternative as identified in Table 5.0-1. Furthermore, as discussed above, there appears to be no basis for the determinations in Table 5.0-1 that the RLA Alternative does not meet the project objectives related to public service standards or connected pathways as well as the proposed West Area Specific Plan would meet these two objectives.

Compared to the proposed West Area Specific Plan, the RLA Alternative would increase density to 11.3 units per acre, meet the number of residential units as provided in the Salinas General Plan, and reduce the project foot print by 162 acres. As discussed above, there is no basis for the determinations in Table 5.0-10 that any specific impacts for the RLA alternative are greater, or even slightly greater, than for the West Area Specific Plan.

Please explain whether the Reduced Land Area Project Alternative is environmentally superior to the proposed West Area Specific Plan.

Thank you for the opportunity to review the DEIR.

Sincerely,



Michael DeLapa
Executive Director