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12/04/2019

Salinas Planning Commission
City of Salinas
200 Lincoln Avenue
Salinas, CA 93901

Subject: West Area Specific Plan

Dear Planning Commissioners,

The Monterey Bay Economic Partnership (MBEP) was founded in 2015 with a mission to improve the economic health and quality of life in the Monterey Bay Region. Our Housing initiative was launched the same year to support and catalyze an increase in housing, of all types and income levels, in the region. Our Housing initiative begins with a broad coalition of community members, local employers, and organizations to advocate for the construction of housing.

The West Area Specific Plan proposes a maximum of 4,430 homes with an average minimum density of nine units per residential acre. This project has the potential to ameliorate the local housing shortage and establishing a positive precedent for future developments. Every possible step should be taken to strengthen the Project's density in order to maximize the development of prime agricultural land.

In 2018, MBEP partnered with Envision Housing to publish a Housing Policy White Paper, outlining several ways local governments can easily increase the quantity of housing built and encourage housing affordability. We applaud the City for the progress it's made in adopting some of our recommendations, such as the deferral of impact fees for housing developments. However, there still remains much work to be done.

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Santa Cruz, San Benito, Monterey



The adoption of an Enhanced Density Bonus Ordinance would provide additional concessions to market-rate developments in exchange for the inclusion of additional deed-restricted housing units. The City's Density Bonus could be strengthened up to 50%, as neighboring jurisdictions have done. More certainty for long-term ADU policies, such as the City's temporary five-year impact fee holiday, should be codified as a condition of the Plan's development agreement and adoption. Additional opportunities to strengthen the plan include reducing parking requirements and zoning for higher housing densities to yield maximum land use and benefit.

We encourage the City to consider the adoption of such policies to facilitate the creation of affordable housing, mitigate unaffordability and optimize housing outcomes resulting from the West Area Specific Plan's adoption. We also encourage the City to ensure that increased housing density goals outlined in the Plan are fulfilled by developers such as maximizing mixed use opportunities and ADU development.

In summary, MBEP would like to strongly encourage:

1. Implementation of enhanced density bonus policy
2. Conversion of commercial space where feasible to maximize housing as part of mixed-use site
3. Incentives for ADU development (fee waivers, design standards, etc.)

The West Area Specific Plan is the largest housing decision put forth to the City of Salinas in a generation. The Project has great potential and should be strengthened where possible to ensure it results in the greatest positive outcome for the City of Salinas.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kate Roberts', with a stylized flourish at the end.

Kate Roberts
President & CEO
Monterey Bay Economic Partnership

December 2, 2019

Mayor Gunter, Salinas City Councilmembers and Planning Commissioners
Salinas City Hall
200 Lincoln Avenue
Salinas, CA 93901

**RE: Increase Affordable Housing and Tenant Protections to Mitigate the
West Area Specific Plan Impacts**

Dear Mayor Gunter, Councilmembers and Planning Commissioners:

We are a group of local residents and stakeholders who have come together to support increased affordable housing in Salinas. We have concerns regarding the proposed West Area Specific Plan (WASP).

Presently, the median rent for a two-bedroom apartment in Salinas is \$2,095, nearly double the national average.¹ The skyrocketing rents, combined with the city's median household income of \$54,864,² have resulted in severe overcrowding, substandard living conditions, and housing prices that are out of reach. According to the latest figures, only 9% of Salinas residents are able to afford the median home price.³ One in ten students in Monterey County is experiencing homelessness, the highest rate among all counties in the State.⁴

State legislators have recognized and responded to this larger housing crisis by enacting comprehensive policy solutions such as SB 329 and AB 1482, addressing source-of-income discrimination and establishing a statewide rentcap including just causes for eviction, respectively. Still, locally there remains much work to ensure that the protections provided by these bills are duly enforced. We applaud efforts by the Mayor, Councilmember Barrera, and Councilmember Davis who are bringing forward an ordinance to ensure that state level provisions do not result in evictions across Salinas before going into effect January 1, 2020.

We understand the critical need to increase the City's housing supply and that the WASP has the potential to be a significant step forward in addressing our inadequate housing stock by proposing 4,340 new homes. However, the Plan's large-scale, decades-long buildout and high prices will not meet the needs of existing residents. Construction of the Plan's mixed-use residential component, the most affordable component of the Plan, is projected to take place twenty years out. Based on the City's baseline economic forecast, the average home prices included in the WASP range from \$400,000 to \$600,000. We recognize the incredible investment in time and effort to assemble the WASP project area since the early 2000s. The

¹ [The Californian, March 2019](#)

² [United States Census Bureau](#)

³ National Association of Home Builders (2018). 2006 - Q42018 NAHB - Wells Fargo Housing Opportunity Index (HOI)

⁴ [Crisis on the Coast, November 2018](#)

project should proceed and be strengthened so that it better meets the needs of Salinas residents through these two provisions:

- 1) Adopt a plan that encourages more affordable housing through higher densities. The City should commit to adopting an enhanced density bonus program that allows for reductions in zoning code requirements (such as parking, setbacks, and height) in exchange for more affordable housing. City Staff should also work with the developers to maximize densities wherever possible. Increasing density will mitigate environmental impacts to levels within the existing impact parameters.
- 2) Adopt a robust Community Benefits Agreement to mitigate the significant impacts of the proposed WASP development and work with the CDBG Housing Committee's Technical Advisory Committee to reach a workable set of policies to provide adequate protections to existing residents. The Salinas Economic Development Element outlines the need to encourage the use of "community benefits agreements" between developers and community members to provide amenities and/or mitigation to the community.⁵ Likewise, the Alisal Vibrancy Plan calls for a need to "maximize community benefits" and other amenities through the adoption of a community benefits agreement.⁶ Concrete action is needed now. The CBA must include a commitment to adequately and continually fund an Anti-Displacement Fund that will support tenant and landlord education, free legal assistance and relocation assistance.

Salinas exists at the intersection of extraordinary rural, suburban, and urban housing challenges. Beyond the larger, highly-urbanized cities, other medium sized working class communities have adopted protection and stabilization policies to holistically address their housing crisis. While our City faces unique challenges, we have the opportunity to learn from and integrate similar policies other jurisdictions have adopted throughout the state.

Addressing the needs of the entire Salinas community requires creative policy and strong leadership. We strongly believe these requests are critical in ensuring that the future buildout of the City including the West Area Specific Plan be a positive step in meeting the housing needs of hard working Salinas residents and not the Silicon Valley.

Thank you for your consideration.

Sincerely,

⁵ Economic Development Element, City of Salinas, Action WF: 2.1.1, page 2:58.

⁶ Alisal Vibrancy Plan, City of Salinas, Landuse and Design: LU: 2.8, page 83.

*Al Espindola, Community Advocate,
Salinas Resident*

Alfred Diaz-Infante, Salinas Resident

Alma J. Loreda, Salinas Resident

*Ana Ambriz and Ahkahuil Ruvalcaba,
Salinas Residents*

*Ana Barrera, High School Teacher,
Salinas Renter*

*Andrew & Ruth Sandoval, Salinas
Residents*

*Anthony Rocha, Salinas Union High
School District Trustee, Salinas Renter*

Baktun 12

*Building Healthy Communities, East
Salinas*

Carissa Purnell, Educator

Center for Community Advocacy (CCA)

*Diego "Jacob" Sandoval, Santa Rita
Union School District Trustee*

Eva Silva & Jose Gil, Salinas Residents

*Jyl Lutes, Former Salinas Mayor Pro Tem
& Councilmember*

*Lorena Silva and Ruben Pizzaro, Salinas
Residents*

Luis A. Preciado, Salinas Resident

*Maricela Cruz, Business Owner, Salinas
Resident*

*Matt Huerta and Diana Huerta, Salinas
Residents*

*Monterey Bay Central Labor Council,
AFL-CIO*

*Nathalia Carrillo, Former Salinas Planning
Commissioner*

*Omar Perez, Alisal Vibrancy Plan
Steering Committee, Salinas Resident*

*Phillip Tabera, Salinas Union High School
District Trustee*

Viviendas Para Todos

*Sally Torres, COPA Leader, Sacred Heart
Parish*



Devon B. Lincoln
Attorney at Law

E-mail: dlincoln@lozanosmith.com

December 4, 2019

By E-mail: jill.miller@ci.salinas.ca.us

City of Salinas
Community Development Department
Attn: Jill Miller, Senior Planner
65 West Alisal Street
Salinas, California 93901

Re: Planning Commission Meeting for West Area Specific Plan

Dear Ms. Miller:

Our office represents the Santa Rita Union School District ("District"). This letter is in regard to the City Planning Commission's consideration this afternoon of the West Area Specific Plan ("Specific Plan"), including the Environmental Impact Report ("EIR") that was prepared for the Specific Plan. The District previously reviewed the Draft EIR, and on April 15, 2019 provided written comments to this document (through a letter from our office). We are writing you this letter to raise concerns that our client has with the Planning Commission's consideration of the Specific Plan and the EIR.

First, to my knowledge the City has not provided responses to the District's comments, and perhaps has not provided responses to other comments, including those by other governmental entities. CEQA Guidelines section 15088(b) states that "(t)he lead agency shall provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report." While the EIR would not actually be certified until it goes before the City Council, pursuant to Municipal Code section 3-01.03(b)(3) the Planning Commission is charged with the obligation of the recommending certification of the EIR because it is a necessary component to the Specific Plan. As such, we believe the Planning Commission should have a complete record to review, including the responses to the comments made by the District and others.

Another area of concern relates to the attachments for the Specific Plan and EIR approval. To my knowledge, the attachments have not been made publicly available, and are not available on the City's website. Instead, recipients who have placed themselves on the email distribution list (myself included) received this note: "Please note that due to the large page count of the attachments, only a hardcopy of the Agenda will be distributed to Planning Commissioners during the meeting." From this note it is not clear that attachments have been given to Planning Commission or the public, which would seem unusual given the City's past practice of posting

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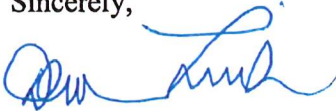
4 Lower Ragsdale Drive, Suite 200 Monterey, California 93940-5758 Tel 831-646-1501 Fax 831-646-1801

City of Salinas
Community Development Department
Attn: Jill Miller, Senior Planner
December 4, 2019
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lengthy attachments on its website simultaneously with the posting of a meeting agenda. To comply with the Brown Act, the attachments need to be made available to the public if they are going to be viewed and considered by the Planning Commissioners at the meeting. (See Gov. Code, § 54957.5.)

Based on the foregoing, it appears that the Planning Commission may not be adequately prepared to consider the Specific Plan approvals this afternoon. If indeed the comments to the EIR have not been responded to, and the public has not had an adequate opportunity to review and consider what will be before the Planning Commission this afternoon, the District believes it would be best to have this matter continued until everything has been worked out. If the public has not been provided an opportunity to review documents that have been provided to the Planning Commission, serious Brown Act concerns may be raised by proceeding today. Certainly, proceeding in this manner does not support the principles of government transparency inherent in the Brown Act and CEQA.

Sincerely,



Devon Lincoln

DBL/en

cc: Timothy Ryan, Acting Superintendent/Chief Business Officer
Santa Rita Union School District
(By Email: tryan@santaritaschoos.org)



**Testimony Before the Salinas Planning Commission on the
West Area Specific Plan and Final EIR**

December 4, 2019

**Michael DeLapa
Executive Director, LandWatch Monterey County**

Good evening. My name is Michael DeLapa. I'm the Executive Director of LandWatch Monterey County, a nonprofit, land conservation and planning organization that works closely with communities, elected officials and infill developers to create sustainable plans and projects. Our goals are stop sprawl, encourage urban in-fill and affordable housing, and promote climate-friendly development. Over the past several years, LandWatch has been proud to support workforce housing projects throughout Monterey County, including T&A's Spreckels Crossing, Casa Boronda, Avila Construction's Greenfield project, and others. These are good examples of what can come out of close collaborations and smart planning.

As we noted in our comments on the Draft EIR, the West Area Specific Plan, as hard as it tries, is not smart planning. The plan proposes to sprawl 4300 residential units over approximately 800 acres of annexed farmland. Average residential density of 9 units per acre favors large, expensive single-family homes over apartments and homes designed for affordability. By favoring cars rather than walking and biking, low density sprawl also generates significant greenhouse gas emissions and unmitigated air quality impacts.

We previously urged the City to adopt the Reduced Land Area (RLA) Project alternative. Under this alternative the average residential density would increase from 9 to 11 units per acre.

The Final EIR acknowledges that this alternative "would create a modest improvement to conserve agricultural land, lower housing prices, and lead to more economically and environmentally sustainable outcomes." So why isn't your staff recommending this alternative?

Here is what the Final EIR says:

First, it argues that the Reduced Land Area Alternative “does not fully meet the project objective to ‘Provide public services and infrastructure improvements that achieve and maintain City service standards’ because this alternative would develop fewer roadways, bicycle and pedestrian pathways, and other infrastructure improvements (such as well sites) when compared with the proposed project.” (FEIR, p. 2.0-84.) You do not need infrastructure and services for land that is not developed.

Second, the Final EIR also claims that the Reduced Land Area Alternative would have greater air quality impacts because it is inconsistent with the Air Quality Management Plan. The inconsistency? It was not modeled in that Plan, which assumed more sprawl. This is absurd. The Final EIR admits that Reduced Land Area Alternative would in fact have lower air quality emissions. (FEIR, p. 2.0-87)

Even more absurd, the Final EIR

- Admits the Reduced Land Area Alternative is environmentally superior to the proposed project. (FEIR, p. 2.0-97)
- Admits the Alternative meets the basic project objectives by providing the same number of housing units. (FEIR, p. 2.0-89 to 2.0-90, correcting false claim in DEIR that RLA Alternative would have fewer units[.])
- Claims the only project objectives the alternative does not meet are not basic objectives. And reason they say the objectives are unmet makes no sense (FEIR, p. 2.0-96).
 - The FEIR says the Alternative does not meet services and infrastructure objectives because it does not provide services and infrastructure in the undeveloped area.
 - Similarly, the FEIR says the Alternative does not establish sidewalk, pathway and open space system because it does not establish them in the undeveloped area.

If the bike and pedestrian linkage to the Central Area Specific plan is really needed, the developers can build a path without developing the 162 acres.

Your consultants had to completely revise the alternatives comparison tables in the Final EIR because the table failed to acknowledge that the Reduced Land Area Alternative had lesser or

equal impacts than the proposed sprawl project. (FEIR, pp. 2.0-85, 2.0-90)

To put the Reduced Land Area Alternative of 11 units/acre in context, the City of Monterey is currently planning to rezone a portion of its downtown to 30 residential units/acre. Why?

Because the City recognizes that land in Monterey County is extremely valuable. That higher densities mean lower housing prices and easier walking, biking, and public transit. Monterey County already has 9000 approved but unbuilt single-family residential units and doesn't need any more. What Monterey County needs is apartments that are close to public services and daily needs.

You may not remember the long, expensive legal battle over Rancho San Juan/Butterfly Village, just a few miles north of the West Area Plan. Approved in 2008, Butterfly Village has 1147 homes already entitled and ready to be built. So how many have been built? Zero.

So why would the City want to approve more low-density sprawl that doesn't meet the needs of its working residents, that tax its schools, increase air pollution and greenhouse gases, and turn farmland into concrete?

Once again, LandWatch urges you to think about public needs, not private desires. Please consider adopting the Reduced Land Area Alternative to increase the density of the West Area Specific Plan modestly from 9 to 11 acres. You'll save land, reduce air pollution, and make homes and apartments more affordable for your residents.

