

April 9, 2024

Planning Commission
Care of Andrew Myrick
Economic Development and Community Planning Manager
City of Seaside
440 Harcourt Avenue
Seaside California 93955
via email: amyrick@ci.seaside.ca.us

Re: Final Environmental Impact Report for Seaside 2040 (SCH #2017071021)

Dear Members of the Seaside Planning Commission:

The proposed Seaside 2040 General Plan Update does not require and should not include the provision calling for a specific plan in the Seaside East area. The proposed development of the 635-acre site was not required for the City's housing element, which does not include this area as part of its site inventory. Seaside East is not required for economic development since there is ample infill space for development of employment land uses. And the inevitable impacts to biological resources and the lack of a water supply render development of Seaside East infeasible.

LandWatch submitted extensive comments on the draft Environmental Impact Report (EIR) for the Seaside 2040 General Plan Update. LandWatch objected that draft EIR fails to provide adequate analysis and mitigation of the impacts of developing the Seaside East area. LandWatch also objected that the draft EIR's alternatives analysis does not adequately discuss the alternatives that would decrease development in the Seaside East area. LandWatch asked that the City address the shortcomings identified in its comments by revising and recirculating the draft EIR.

The final EIR fails to respond adequately to LandWatch's comments on the draft EIR. Because the Final EIR was released only a few days ago, LandWatch has not had sufficient time to respond to its shortcomings in any detail.

That said, it appears that the final EIR fails to resolve the inconsistent projections of development and continues to rely on unfounded growth assumptions in an effort to suggest that development

of Seaside East is needed. Thus, the Final EIR perpetuates the erroneous failure to assess an alternative that would not develop Seaside East.

The final EIR also fails to meaningfully address comments that object that the Seaside East area cannot be developed as proposed without significant unmitigated impacts to biological resources. Instead of analysis, the Final EIR continues to offer vaguely worded policies and programs without any evidence that these policies and programs could actually prevent significant impacts in the Seaside East area.

The final EIR still fails to provide an adequate assessment of water supply related impacts. The comment responses simply reiterate that the analysis is based on inconsistent and unreconciled assumptions about growth. Nor does the Final EIR acknowledge the uncertainty of future water supplies for the Seaside East area.

The final EIR is not an adequate disclosure of the impacts of developing Seaside East. Thus, the EIR must be revised and recirculated to provide meaningful analysis and mitigation.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. DeLapa". The signature is stylized and cursive, with the first name "Michael" and last name "DeLapa" clearly legible.

Michael D. DeLapa