LANDWATCH
MONTEREY COUNTY

August 10, 2026

Supervisor Wendy Root Askew, Chair
County of Monterey Board of Supervisors
168 West Alisal St., 1st Floor
Salinas CA 93901
By email: COB@countyofmonterey.gov

Subject: Agenda Item 20, Approve a Property Tax Transfer between the County of Monterey and the City of Gonzales for the proposed "Vista Lucia Reorganization"

Dear Chair Root Askew and Board of Supervisors,

Regarding Agenda Item 20, Approve a Property Tax Transfer between the County of Monterey and the City of Gonzales for the proposed "Vista Lucia Reorganization" — **LandWatch objects**. **Approving this transfer sets a dangerous precedent**: it lets the City of Gonzales disregard the 2014 Memorandum of Agreement. That MOA requires agricultural mitigation easements to be adjacent to the City. It also provides for only approving that amount of land necessary for the City's growth. Both commitments serve the MOA's central purpose: preventing premature conversion of agricultural land.

In any event, the County should not act on this agreement on August 18. LAFCO staff issued a finding that the annexation application is incomplete because the agricultural mitigation is unacceptable, and LAFCO will hear the City's appeal of that finding on August 24. It would be absurd for the County to ratify a tax sharing agreement premised on the ag mitigation being acceptable, only to have LAFCO reach the opposite conclusion six days later. There's no reason to rush: the earliest LAFCO can even consider the adequacy of the tax sharing agreement is when it takes up the application as a whole, no sooner than its next meeting in late September. The County should wait for the City's appeal of the ag mitigation issue to be resolved.

Aside from LAFCO's process, the County cannot find that the agricultural mitigation as proposed meets the terms of the MOA. The County staff report erroneously states that the developer's plan to buy an easement over 9 miles from the City satisfies the MOA's agricultural mitigation commitments (Section 6). But Sections 6.1 and 6.4 require the City to permanently secure agricultural easements immediately adjacent to its northern, western, and southern boundaries — the point is to limit and control the direction of growth, not merely to conserve acreage somewhere. A site 9.4 miles away in another community can't do that.

The proposed easement's lack of proximity to the City is the same issue that LAFCO staff raised in finding the application incomplete. LAFCO's ag mitigation policy mirrors the 2014 MOA by requiring easements to be in close proximity to the community unless, after good faith efforts, the developer cannot locate one. LAFCO staff identified three available easements in close proximity, but the developer has refused to consider them. (See LAFCO's "Map of Three Available Conservation Easement Sites Nearby Gonzales and the City's Proposed Site.")

Furthermore, the developer's agricultural mitigation proposal only covers the first phase of development; there is no proposal for the remaining phases of development, and yet the City asks the County to sign off on compliance with the MOA for the entire 800 acres.The County would have no way of enforcing its MOA if future phases were built without agricultural mitigation that meets the County's standard. Allowing the developer to ignore the MOA for the first phase would set a bad precedent for future phases.

The ag mitigation failure isn't the only problem: Vista Lucia also proposes too large an area for development and contains neighborhoods with low density. Section 2.1 requires the City "to require Specific Plans to include residential densities that ensure a compact urban form that helps protect agricultural land from premature conversion." Over 200 units are planned with an average density of 5 units per acre; that is a fifth of an acre for a house and patently not "compact urban form."

Furthermore, the City is asking LAFCO to approve nearly 800 acres for development, with 3,500 homes. This doubles the size of Gonzales, and there is no objective argument supporting demand for this level of housing development. AMBAG forecasts housing growth for Gonzales from 2020 to 2050 of only 1,200 homes, far fewer homes than proposed. At a minimum, the County should refuse a tax sharing agreement for an area larger than Phase 1 and ask the City to return with a new proposal once Phase 1 is near completion.

Thank you for your consideration. I hope you will oppose the proposed tax sharing agreement.

Sincerely,



Michael DeLapa
Executive Director