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Via email

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Re: Draft Visión Salinas 2040 General Plan, East Area Specific Plan

Dear Ms. Brinton and Mssrs. Leonard and Moore:

Thank you for your time on April 16 discussing the initial public review draft of the Visión Salinas 2040 General Plan (VS 2040 GP) and the East Area Specific Plan (EASP). Set out below are LandWatch's comments and concerns. Our primary recommendation is that the City should substantially increase the minimum densities at which vacant land may be developed in the future to incentivize housing that is more affordable to local working families.

A. Increased density is essential for affordability.

In Salinas, only 8% of households earn enough to afford an \$800,000 single-family home¹. Thus, the key objective of the City's planning should be to produce housing for lower income households and the "missing middle." Complementary key objectives include creating walkable communities with access to services and urban amenities without generating excessive VMT.

Thus, the majority of the vacant land to be designated for residential use should require at least 16 units per acre and should permit densities up to 40 units. Here's why.

There is no question that units affordable to lower and middle income households require high density zoning. The single most important variable driving housing unaffordability in Monterey County is the density at which homes are built. Lower density means more land per home, higher land cost per unit, and ultimately higher prices. Higher density means land costs are shared across

¹ U.S. Census Bureau ACS 5-Year Estimate, 2023. [8% earn above \$150,000.]

more units, and per-unit construction costs decline as well. Lower construction costs are the reason for the Mullin density requirements under RHNA – a minimum of 20 units per acre for lower income units in Monterey County.

A local developer has confirmed this dynamic concretely: construction costs for an approximately 1,200 square-foot multi-family unit (apartment, townhouse, or condo) run approximately \$375,000 per unit. The same-sized single-family home costs approximately \$480,000 per unit to build – a 28% premium before land cost is even factored in. When land cost is added, the gap widens further at low densities, where that land cost is carried by a single household rather than shared across a building.

In the Salinas Valley, the income distribution offers a potential buyer pool for moderately priced for-sale housing – but only if prices are kept below \$450,000 through density. A townhouse or condominium in a 15–20 du/ac development can potentially be priced at \$350,000–\$450,000, making it accessible to a household earning \$75,000–\$100,000 with FHA financing. A single-family home on a large lot cannot reach that price point. So for Salinas Valley cities, the strategic priority should be to zone for fewer low-density single-family lots and more medium-high and high-density parcels.

The optimum density for “missing middle” housing is generally defined by two key thresholds: the minimum density required to support local amenities and the maximum density that maintains a “house-scale” appearance within a neighborhood.² Experts such as Opticos Design and MissingMiddleHousing.com identify 16 dwelling units per acre (du/ac) as the critical threshold needed to support walkable amenities, transit, and local businesses, e.g., to develop the kinds of new urbanism neighborhoods called for by the General Plan in the City’s Future Growth Areas. Most missing middle housing types typically range from 16-35 units per acre. But in contexts where these homes are mixed side-by-side with single-family houses, densities can reach up to 40 units per acre while still blending in, provided the building forms remain “house-scale.”³

The VS 2040 GP observes that there is currently limited infill space for development in large part because most of Salinas’ land designated for housing is limited to single family housing. (VS 2040 GP, p. 42.) In areas where there is existing development, this should be rectified by increasing allowable density and permitting a wide mix of housing types in the new “place type” land use designations. In vacant land, especially in the proposed new specific plan areas, this should be

² Opticos, What is Middle Housing?, visited April 24, 2026, available at <https://www.ezview.wa.gov>; Wednesday Journal, “Oak Park works to expand ‘missing middle’ housing,” July 26, 2024, available at <https://www.oakpark.com/2024/07/26/missing-middle-affordable-housing-oak-park/>.

³ Daniel Parolek, Missing Middle Housing, Thinking Big and Building Small to Respond to Today’s Housing Crisis (Island Press, 2020); Opticos, Missing Middle Housing, Responding to the Demand for Walkable Urban Living.

<https://opticosdesign.com/blog/missing-middle-housing-responding-to-the-demand-for-walkable-urban-living-2/>; National Association of Homebuilders, Housing Density and Missing Middle Housing, March 2023, available at

<https://www.nahb.org/-/media/NAHB/advocacy/docs/industry-issues/land-use-101/state-local-affordability/missing-middle-housing-overview.pdf>.

rectified by mandating higher minimum densities in most areas – a minimum of 16 units per acre.

LandWatch supports the use of the “Blended Residential Neighborhood” place type as an alternative to the “Traditional Neighborhood” place type because it permits higher densities and a wider mix of housing types. (VS 2040 GP, pp. 53-54.) However, instead of the proposed 12 to 20 du/acre density, the Blended Residential Neighborhood density should be increased to require at least 16 du/acre and to permit as many as 35 du/acre. To provide the affordable missing middle units and to create vibrant, walkable communities that support services and transit, this Blended Residential Neighborhood place type should be the primary residential land use designation for vacant lands, including the specific plan areas.

Where it is applied at all, the Traditional Neighborhood place type should be revised to allow 8-16 du/acre instead of the proposed 6-12 du/acre. The Traditional Neighborhood place type should be applied only to existing development areas. No new vacant land areas should be designated for the Traditional Neighborhood place type, including the vacant land in the EASP area.

The proposed place types may unnecessarily segregate larger MFH units to Multifamily neighborhoods, allowing only “small” apartment buildings in Blended Residential Neighborhoods. “Small” is not defined. The VS 2040 GP should permit 4-story MFH units of appropriate scale in Blended Residential Neighborhoods.

B. East Area Specific Plan

1. Because EASP development is not needed for many years, it should be staged carefully.

The EASP site is mostly prime farmland. (VS 2040 GP, Figure COES-1, Inventory of Important Farmland.) Developing housing on this prime farmland is not actually needed to meet the City’s housing needs before 2050. Consider the supply and demand data below.

SUPPLY: Salinas’s 2023-2031 Housing Element identifies sites for 8,094 units, without the EASP. (Housing Element, Table 58.) Those 8,094 units include only 4,960 units from the West Area Specific Plan (WASP) and Central Area Specific Plan (CASP) even though these two FGA sites actually provide sites for 8,250 units. The Housing Element only counts 4,960 CASP/WASP sites toward the 2023-31 RHNA target because it conservatively counts only sites for which there is already a development agreement and near-term infrastructure. (Housing Element, Table 58 and p. 157.) Thus the Housing Element omits the 3,290 units remaining from CASP and WASP. Adding the omitted 3,290 CASP and WASP units to the 8,094-unit site inventory yields sites for 11,384 units without the EASP.

DEMAND: AMBAG’s 2026 Regional Growth Forecast (page 4) projects that Salinas will need only 7,778 additional units between 2023 and 2050 and only 8,312 units between 2020 and 2050. Thus, there are already sufficient sites for projected growth – a 46% buffer through 2040.

ADDITIONAL SUPPLY: Furthermore, this analysis does not reflect the plan in VS 2040 GP to increase allowable densities in virtually every existing infill site and to greatly increase the number

of sites permitting mixed use. (Housing Element, p. 157.) Allowable densities will increase from 25% to 50% across the board. The City is to develop a buildout projection based on this rezoning, which will demonstrate substantial capacity in excess of foreseeable demand through 2040 – much more than the 46% buffer noted above.

POLICY CONSIDERATIONS: Policy LU-1.3 – requires the City to “Maintain a compact urban form, locating growth areas in a manner that mitigates negative impacts of future growth on environmental quality and quality of life and minimizes loss of important agricultural resources, while allowing for the reasonable expansion of the City to address projected population growth.” Opening the EASP for development before it is needed will not further compact growth or preservation of agricultural land. Furthermore, opening EASP prematurely will erode absorption of residential units in the CASP and WASP areas and erode infill development in the rest of the City. Indeed, premature perimeter sprawl has the potential to cause urban decay in the downtown core.

OPTIONS: There are several options to avoid premature agricultural land conversion, sprawl, and urban decay. If the City is not going to postpone adoption of a specific plan until demand warrants it, the City should at minimum bar leapfrog development through a phasing plan that permits only contiguous development. And the City should mandate a minimum average density of 16 units per acre to minimize the development footprint while still providing housing units.

2. EASP’s minimum average density should be ensured and increased.

Low density development does not provide a base for neighborhood retail and services or a new urbanism walkable community. The EASP should ensure that a minimum average density must be attained and that this minimum average density be high enough to support the new urbanism vision.

The CASP plans a minimum density of 9 du/acre and a maximum density of 10.7 du/acre for the entire SP area based on 7 distinct land use designations with specified minimum and maximum densities. (CASP, Section 3.9.2, conformance with General Plan required density ranges.)

By contrast, the EASP proposes to use a smaller set of “place types” as the land use designations or zoning categories, and these place types permit a much wider range of densities, purportedly to ensure more flexibility. However, as illustrated in the table below, using the same analysis approach as the CASP, accounting for acreage and the minima and maxima of the density ranges for each land use designation (place type), the EASP might have an average density of only 7.65 du/acre and could not have an average density greater than 15 du/acre. This is too low to meet the objectives of affordable, walkable, well-served urban neighborhoods.

PLACE TYPE	low density	high density	middle density	acres	units at middle	units at low	units at high	
HILLSIDE	2	6	4	110	440	220	660	
TRADITIONAL	6	12	9	304	2,736	1,824	3,648	
BLENDED	12	20	16	107	1,712	1,284	2,140	
MULTIFAMILY	20	40	30	23	690	460	920	
CENTER	15	30	23	51	1,148	765	1,530	
TOTALS					<u>595</u>	<u>6,726</u>	<u>4,553</u>	<u>8,898</u>
AVG DENSITY PER NET RES ACRES					11.30	7.65	15	

A higher minimum average density than 7.65 du/acre must be ensured. The 7.65 du/acre minimum average density that would be permitted for the EASP is lower than the 9 units per acre ensured in the CASP.

A higher minimum average density could be attained by using narrow density ranges and more new general plan place types, or by using more and narrower zoning categories than general plan place types, or by requiring a minimum unit count for each parcel based on, e.g., the midpoint of the place type density range.

As explained above, that minimum average density should be at least 16 du/acre to support walkable amenities, transit, and local businesses.

3. At least 60% of the EASP should be required to attain the mid-range densities to ensure affordability, variety, and adequate density to support services and new urbanism walkability.

Attaining a minimum average density should not be based on providing only very low density areas and a few very high density areas. A range of densities should be provided. To ensure this, the current General Plan requires 15-25% of the FGA units be in the 16-24 du/acre range and 35-45% be in the 7-14 du/acre range. (2004 GP, p. LU-39.) After increasing these mid-range densities to ensure that the minimum average density does actually attain 16 du/acre, a requirement like the 2004 General Plan requirement that FGAs provide specified percentages of units in mid-range densities should be imposed in the VS 2040 GP.

4. The Hillside Neighborhood place type is not needed as a buffer and is not equitable.

The Hillside Neighborhood place type designation, unique to the EASP, and allowing a density range from 2 to 6 du/acre, should be eliminated. There is no reason to permit as few as 2 units per acre as a buffer or transition to the east since the permitted direction of future growth is to the east, and, with that growth, there will be no need for a transition or buffer. Indeed, building in a buffer makes no sense if the future direction of growth is to the east. Furthermore, it is inequitable to reserve land with views and open space adjacency for high-end market rate units and to deny it to lower and moderate income households.

5. The Stonebridge conditions for integrated, concurrent, and on-site IHO affordable units should apply.

Builder Stonebridge agreed to provisions for its developments in the CASP that would ensure integration, concurrent development, and on-site provision of affordable units. Similar conditions should be required by the City of all new developments in the EASP.

The Stonebridge conditions ensure that:

- One affordable unit is built for every 6 market rate units.
- Affordable units are integrated into market rate neighborhoods.
- All affordable units are provided within the proposed development area, preferably by the builder.

The in lieu fee alternative should not be permitted except as required by law. When in lieu fees are used, the fees must be used to fund construction of on-site affordable units by an affordable housing developer. Land dedications or off-site construction as a means of satisfying the IHO should not be permitted in EASP.

C. Development outside SOI

As part of the proposed Visión Salinas 2040 General Plan, the City is considering future amendments to its sphere of influence to include the following four Economic Opportunity Area (EOA) Target Areas identified in the City's current Economic Development Element (EDE):

- EOA B Target Area, located to the southeast of the city, south of Abbott Street
- EOA K Target Area, located to the northwest of the city, east of Highway 101
- EOA L2 Target Area, located to the west of the city, to the north of Boronda and to the west of Highway 101
- EOA N Target Area, located to the south of the city, east of SR 68 to the south of East Blanco Road

We are concerned about these proposed expansions, especially those that will consume valuable agricultural land.

1. Action LU-1.4.3 regarding annexation should be revised to more carefully limit annexation and SOI expansion.

Policy LU-1.4 and its implementing actions call for expansion of the City to provide land for development as follows:

- Policy LU-1.4: Promote economic development through focused land use planning and infrastructure improvements, and targeted resource expansion.
- Action LU-1.4.2: Complete the Ferrasci/Target Area K Specific Plan and implement by incorporating land into the city through annexation.
- Action LU-1.4.3: Selectively increase the supply of land outside of existing City limits for economic and housing development by expanding the Sphere of Influence to include Target Areas and by exploring future annexation as projects come forward.

The VS 2040 GP should clarify that increasing the supply of land must be consistent with the Greater Salinas Area MOU and the direction of growth set out in that document. Furthermore, any expansion of the SOI or annexation should be limited to specific, contiguous development proposals within the near-term Target Areas defined in the Economic Development Element and only if a specific plan is developed. To reflect these limitations, Action LU-1.4.3 should be revised as follows:

- Action LU-1.4.3: Selectively increase the supply of land outside of existing City limits for economic and housing development by expanding the Sphere of Influence and future annexations, but limit such expansions to specific, contiguous development proposals within the near-term Target Areas as defined in the Economic Development Element and consistent with the Greater Salinas Area MOU and its Addendum. Require preparation of a specific plan for all such expansions. Do not permit SOI expansion, annexation, or development in Economic Reserve Areas prior to 2045.

2. Northern Area should annex County Housing Element Sites 1, 2, and 3 and Salinas should assume the County RHNA for those sites.

The area north of Russell Road and east of 101 is now in County jurisdiction and designated for agricultural or commercial use. It is not in the City's SOI. However, the area is now identified as a "potential SOI addition." (VS 2040 GP, Fig. LU-1.) The area comprises "Target Area K" in the Salinas 2017 Economic Development Element (EDE). Target Area K is that portion of the larger Area K (aka the "North Entrance" area) that is planned for near to intermediate term development.⁴

This area is also called out as the "Northern Area" in the 2019 Addendum to the Greater Salinas Area MOU between the County and the City. The 2019 Addendum provides that the City will take the lead in approvals if annexation is planned. The Addendum provides that the County will coordinate with the City on a specific plan for the City's potential development within Target Area

⁴ The rest of Area K, north of Target Area K, is called "Opportunity Area K," and is identified as an "Economic Development Reserve." This area is planned for longer term development, after development of the FGAs, and presumably after the 2040 horizon year.

K, consistent with EDE land uses and policies. “The location of the proposed Specific Plan area is generally north of Russell Road and east of Harrison Road, as shown on a map attached to the Addendum.”⁵ The Specific Plan area is designated on Exhibit A to the 2019 Addendum.

The currently proposed specific plan would include the planned Ferrasci Business Center, a 140-acre mixed use project for which an NOP has been issued and a DEIR is expected in 2026. It would have 257 residential units and 1.5 million sf of commercial space, filling in the area north of Russell Road to the east of 101 and to the west of what is identified in the County draft Housing Element as Opportunity Site 1. We understand that the City and County may be negotiating further amendment of the MOU, but it is not clear what further amendment is sought or what land in addition to the Ferrasci project might be included.

Despite the plan in the 2019 Addendum to have the City take charge of development and to do so via specific plan and annexation, three Opportunity Sites in the pending County Housing Element are within this Target Area K, including Site 1 (95 acres, 728 units), site 2 (111 acres, 67 units), and Site 3 (8 acres, 45 units). The Addendum does not address whether a specific plan would be required for portions of Target Area K that are developed and remain within the County’s jurisdiction, e.g., the residential projects on Opportunity Sites 1, 2, and 3. Exhibit A to the 2019 Addendum appears to omit these Opportunity sites, implying that they would remain under County jurisdiction.

Planning and development of the County Housing Element Sites 1, 2, and 3 should be closely coordinated with the City’s planning for the Northern Area. The County’s residential development within or adjacent to the Northern Area should be subject to a specific plan requirement to ensure higher level planning, integration with adjacent development, and greater public participation in planning.

Accordingly, LandWatch asks that the City seek to amend the MOU to provide that the City will assume lead planning responsibility for the County Housing Element Sites 1, 2, and 3 by preparing a specific plan; that the sites would be annexed into the City before development; and that the County would transfer and the City accept the RHNA for the units assumed in the County draft Housing Element pursuant to Government Code Section 65584.07.

3. Abbott Street Extension to the south should not be permitted.

The EDE and the VS 2040 GP identify two areas of industrial expansion in south Salinas. Target Area A is the Uni-Kool site and Target Area B is the Abbott Street Extension. Both are designated as areas to be transformed (high development) through 2040. (VS 2040 GP, Figure LU-5.) The Uni-Kool site is within the City limits and is covered by the existing Salinas Ag-Industrial Center Specific Plan. (VS 2040 GP, Fig. LU-2 and p. 230.) However, the proposed Abbott Street Extension to the southeast is not within the City or its Sphere of Influence.

Neither the Greater Salinas Area MOU nor its 2019 Addendum permit further expansion of the City

⁵ County of Monterey, staff report for the Addendum, 6/18/2019.

to the south. Indeed, the Salinas Ag-Industrial Center Specific Plan created a buffer intended to protect the prime agricultural uses on adjacent lands. And litigation over the enforcement of the Salinas Ag-Industrial Center Specific Plan resulted in the Agricultural Buffer Easement Deed between Uni-Kool Partners, the Ag Land Trust, and the County of Monterey, which specifically bars extension of municipal services to serve properties to the southeast or southwest.

In light of these agreements and previous planning commitments, the VS 2040 GP should be revised to exclude the proposal to develop the Abbott Street Extension.

D. Process for VS 2040 GP, EASP, and Greater Salinas Area MOU

We understand that the City plans to release a revised VS 2040 GP, including a revised Economic Development Element (EDE); a draft of the EASP, and a CEQA review of these plans by June. Please provide notices to LandWatch in accordance with the notice request attached to this letter.

To facilitate further review, we ask that the City provide a summary and a redlined version of its revisions to the initial public review draft of the Visión Salinas 2040 General Plan.

Since the VS 2040 GP now proposes expansion of the Sphere of Influence and annexations that are inconsistent with the allowable directions of growth in the 2006 Greater Salinas Area Memorandum of Understanding (MOU) and its 2019 Addendum, we understand the City plans to seek revisions to the MOU and Addendum. We ask that any draft revisions to the MOU be available for public review at the time the City is circulating the VS 2040 GP, EASP, EDE, and associated CEQA documents.

Thank you for the opportunity to comment.

Regards,



Michael DeLapa
Executive Director

Cc: Craig Spencer
Kate McKenna

NOTICE REQUEST

Please provide notice of all actions related to the Vision 2040 General Plan Update, any revision of the Salinas General Plan Economic Development Element, the East Area Specific Plan, and the Climate Action Plan (the “Projects”), including but not limited to the following:

- Notices of preparation, public review, or intent to adopt an EIR, a negative declaration, or

any other CEQA document prepared for the Projects prepared pursuant to Public Resources Code Sections 21080.4(a) or 21092;

- Notices of approval and/or determination to carry out an action adopting or modifying the Projects prepared pursuant to Public Resources Code Section 21152(a);
- Notices of determination that an action adopting or modifying the Projects is exempt from CEQA, prepared pursuant to Public Resources Code Section 21152(b);
- Any other notice related to the Projects required to be provided to members of the public under the California Environmental Quality Act in response to written request; and
- Notices of any public hearings relating to the Projects for which notice must be given pursuant to the Planning and Zoning Law, California Government Code Sections 65000 et seq, including but not limited to Government Code Sections 65585(b)(1), 65353(a), and 65355.

This request is filed pursuant to Public Resources Code Section 21092.2 as well as Government Code Section 65092, both of which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the governing body of the agency. Please note that notices of public hearings must be mailed or delivered at least ten days prior to hearings.

We are willing to pay any reasonable costs for providing this service, including postage and photocopying charges.

Please provide notices to:

Michael Delapa
LandWatch Monterey County
P.O. Box 1876
Salinas, CA 93902

We would also appreciate receiving electronic notice at execdir@landwatch.org.