

February 9, 2026

Megan Hunter, City Manager  
City of Soledad  
248 Main Street  
Soledad, CA 93926

RE: Status of Miramonte Comprehensive Infrastructure Planning

Dear Ms. Hunter:

LandWatch continues to monitor the progress of the Miramonte project and the preparation of the studies and agreements required to complete the City's approval process. We are concerned about the transparency of the City's negotiations with the developer, in particular the apportionment of infrastructure and other costs, their impact on affordability of homes in the project, and their economic impact on existing Soledad residents. The purpose of this letter is to highlight certain requirements regarding infrastructure financing and to ask for a status report on the City and developer's infrastructure plans.

The City approved the Miramonte project without a comprehensive financing plan for the necessary infrastructure. The City made commitments regarding a plan in the Vested Tentative Map ("VTM") conditions of approval. When the City obtained LAFCO's approval for the project, LAFCO commented on the lack of infrastructure planning, which is normally required in order for LAFCO to assess the request for annexation. As a condition of approval, LAFCO required the City to complete those plans prior to entering into a development agreement.

Specifically, Miramonte Vesting Tentative Map Resolution Condition 45, entitled Finance of Public Improvements and Maintenance, states that "prior to City Council approval of the first final map and improvement plans, the developer(s) shall have prepared, at their expense, a Comprehensive Financing Plan, subject to City Staff review and City Council approval. The Comprehensive Financing Plan shall identify capital improvements necessary to serve the Plan Area and shall allocate funding between impact fees, Mello-Roos Community Facilities District (CFD) bond financing, and may include other potential financing mechanisms. ... At a minimum, the following items shall be included in the Comprehensive Financing Plan: **Project-specific development impact**

**fee study**, including an assessment of ongoing governmental administrative and public safety costs customized to the Miramonte Specific Plan area.” (emphasis added).

When LAFCO approved the City’s application for annexation, it noted that the infrastructure planning was not yet done, and included the following LAFCO policy and staff analysis of project compliance in its findings of approval:

*b) The need for organized community services; the present cost and adequacy of governmental services and controls in the area; probable future needs for those services and controls; probable effect of the proposed incorporation, formation, annexation, or exclusion and of alternative courses of action on the cost and adequacy of services and controls in the area and adjacent areas:*

LAFCO’s 2022 Municipal Service Review and Sphere of Influence Study for the City of Soledad reviewed the City’s existing and anticipated future services and facilities. As discussed in the Study, the City’s plan for providing services (a part of the sphere amendment and annexation application to LAFCO) outlined the very substantial public infrastructure upgrades and extensions that will be necessary to support anticipated future development, including buildout of the Miramonte project. Most of the costs associated with building the infrastructure outlined above are not currently known. However, they will be very significant, in the tens of millions of dollars. **The City intends to quantify the Miramonte infrastructure costs through a comprehensive infrastructure financing plan that will be a required component of one or more development agreements that the City will enter into with a future developer or developers.** The development agreement(s) will, in turn, be a prerequisite to City approval of a final subdivision map or any development permits. In the current absence of a comprehensive infrastructure financing plan, it is not possible to determine with any certainty whether, or under what assumptions, development of the proposed City expansion will be economically feasible with regard to infrastructure costs. However, **the City of Soledad has demonstrated its intention to use future finance studies and development agreements to require new development to be economically feasible without impacting existing City residents.**

Taken together, the City’s commitments and LAFCO’s requirements regarding infrastructure for Miramonte necessitate the completion of a project-specific fee impact study and a comprehensive breakdown on how construction and ongoing maintenance expenses will be paid for, prior to executing a development agreement.

Has the developer made progress in regard to these requirements? If so, we hereby request under the Public Records Act that the City make available to us all records related to the project-specific

fee impact study and the comprehensive breakdown of the means by which construction and ongoing maintenance expenses will be funded.

As we've noted in our letter of December 15, 2025, the infrastructure plan will have an impact on affordability of units if a CFD fee is imposed on those affordable units. For both rental and for sale units, the Affordable Housing Agreement must take into account the impact of Community Services Fees, Community Facilities Fees, and any other special taxation districts that the developer is proposing to create to shift the cost of infrastructure from the developer to future residents. In sum, the City has an obligation to instruct the developer in the infrastructure planning requirements so that key financial data can be prepared and made available to City staff and decision makers at the time they negotiate terms for impact fees, CFDs, and other financing mechanisms, as well as details regarding affordable housing. LandWatch looks forward to receiving a response to its inquiry about the status of the infrastructure planning.

Thank you for your work on this issue and for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael DeLapa". The signature is stylized with large, overlapping letters.

Michael DeLapa  
Executive Director