



March 20, 2018

Jill Miller, Senior Planner
City of Salinas Community Development Department
65 West Alisal Street, 2nd Floor
Salinas, CA 93901

Subject: [Salinas Travel Center Draft Environmental Impact Report](#)

Dear Ms. Miller:

LandWatch Monterey County has reviewed the Draft Environmental Impact Report for Salinas' Travel Center that includes a general plan amendment, a specific plan, pre-zoning, annexation, parcel map, and site plan reviews for two proposed development projects. The project site is currently designated "general industrial" in the City of Salinas General Plan. The proposed project includes a general plan amendment to redesignate 2.19-acres for a hotel and 13.86-acres for a gas station, convenience store, fast food restaurant and mechanics building. Specific development projects for parcels 3 and 4 totaling 17.93-acres are not proposed at this time. The project site is located within a Future Growth Area. County zoning for the site is Farmlands (F), 40-acre minimum combined with Urban Reserve (UR).

The annexation area includes approximately 30 acres within a State of California Department of Transportation (Caltrans) right-of-way for U.S. Highway 101 Ramp 326A and within rights-of-way for the adjacent local public streets. The approximately 34-acre balance of the annexation area would be available for future development.

LandWatch comments as follows:

- **General Plan Amendment and Zone Change.** The DEIR states, "The applicant is requesting that the existing land use designation for a 2.19-acre portion of the project site be amended to Retail..." (p. 4-2) and "With the exception of a 2.19-acre parcel, the remainder of the project site would be zoned Industrial General (IG) consistent with the corresponding land use designation." (p. 4-7) Table 2-1 and Table 4-7 show 13.86-acres for the gas station, etc. Please explain why the 13.86-acres do not require a general plan amendment and zone change.
- **Greenhouse Gas Emissions.** The proposed project would generate approximately 8.52 MT CO₂e per service population. This exceeds the threshold of significance identified by the lead agency of 3.51 MT CO₂e per service population rate of emissions generation for 2025. This emission reduction is needed for proposed project emissions to remain within the statewide emissions trajectory mandated by SB 32, i.e., meet the 2030 statewide emissions reduction goal of 40 percent below 1990 levels. The proposed

mitigation measure requires preparation of greenhouse gas reduction plans. The plans must include specific measures that reduce greenhouse gas emissions below the threshold of significance and are subject to review and approval by the Community Development Director prior to approval of building permits.

The greenhouse gas reduction plans would require more than a 50% reduction in greenhouse gas emissions. Because of the very significant required reduction, mitigation measures may be infeasible. The mitigation plans should be specified in the FEIR because the required greenhouse gas mitigation is not known to be feasible. (Communities for a Better Environment v. City of Richmond (“CBE v. Richmond”) (2010) 184 Cal.App.4th 70). If mitigation is infeasible, the EIR must acknowledge that the impact would be unavoidably significant and a DEIR recirculated since a new unavoidable significant impact was not identified in the current DEIR. (CEQA Guidelines 15088.5a).

- **Water Supply.** The baseline analysis assumes water demand from parcels 3 and 4 even though these parcels are not designated for development at this time. The DEIR states, “The proposed project would replace demand for groundwater from agricultural use with demand for groundwater from urban uses. The net change in water demand derived from this conversion is the difference between the existing agricultural baseline demand from existing agricultural activities on Parcels 3 and 4 and water demand from future development within the entire project site, including Parcels 1 and 2.” (p. 18-19). The DEIR analysis which calculates water demand for all 4 parcels takes credit for reduced water demand of 76.30 acre feet per year from agricultural use, resulting in a net benefit of 29.71 acre feet per year.

The water supply analysis should be revised to include an analysis of baseline conditions and net water demand for Parcels 1 and 2. Since the land has been fallow since 2012 (Table 6-1), no offsets for existing water use appear to be available for development on those parcels. Table 18.2 identifies water demand for Parcels 1 and 2 at 27.6 acre-feet per year. Assuming some water savings for outdoor water recharge and indoor water recharge/recycling, Parcels 1 and 2 would increase water demand by approximately 20 acre feet per year (Assumes the same percentages for net water demand as for the entire project).

An enforceable mitigation measure that requires parcels 3 and 4 to stop using water as soon as the project is approved is required to avoid a finding of significant and unavoidable impacts on the Salinas Valley Groundwater Basin. Seawater intrusion impacts will be aggravated in the near term by any net increase in pumping, and the impact is irreversible.

Thank you for the opportunity to review the DEIR.

Regards,



Michael DeLapa
Executive Director