



**Testimony Before the Salinas City Council on
Final Program Environmental Impact Report of
Salinas' Proposed Economic Development Element**

November 28, 2017

**Michael DeLapa
Executive Director
LandWatch Monterey County**

Good evening. My name is Michael DeLapa. I'm the Executive Director of LandWatch Monterey County. Founded in 1997, LandWatch is a nonprofit, land conservation and planning organization representing more than 1000 residents of Monterey County. We work closely with communities, elected officials and infill developers to create sustainable plans and projects. Over the past year, LandWatch has been proud to support the Tanimura and Antle and Casa Boronda farmworker housing projects – good examples of what can come out of close collaborations and sound planning.

Generally when I argue against a bad project I talk in terms of LandWatch's five principles of sustainable land use. Tonight, I'd like to try something little different. Let me start by identifying myself as a Stanford MBA, an entrepreneur and business executive who spent 30 years creating hundreds of well paid jobs in creative services, software, and other sectors. I've written and reviewed dozens of business plans, seen many businesses succeed and many more fail. In short, I know an economically compelling plan when I see one.

The City's Economic Development Element (EDE) is neither economically compelling nor environmentally reasonable. I urge you to reject it because it puts Salinas on a path to paving over prime farmland all around the City, expanding far beyond what makes economic or environmental sense, and destroying the vibrancy of the city core just as you're launching efforts to revitalize it. I also urge you to reject the Final Program Environmental Impact Report (EIR) based on LandWatch's extensive written comments and your Planning Commission's refusal to certify the Final Program EIR.

Today because of time limitations I'll give you three reasons why an MBA would toss this plan away. On Dec. 5, I'll give you more.

1. The EDE forecasts jobs and land needs through 2063. That's 46 years from now. That's ridiculous. No reasonable businessperson would ever rely on a 46-year forecast.
2. The EDE makes assumptions about economic growth that aren't based in reality. Even though the EDE uses the AMBAG population projections through 2035, *it assumes three-times the growth in jobs in Salinas that AMBAG projects from 2020 to 2035*. The EDE provides no justification for its aggressive assumptions. That's economically unrealistic, and the EIR offers no justification.

3. The EIR should acknowledge and capture externalities. It doesn't. Externalities include overcrowded homes, congested roads, farmland lost, farmworkers displaced, and other community costs. The EDE's apparent focus is the proliferation of big box retail stores on the periphery of Salinas. While there will be taxes to collect, there will also be roads to build and workers to house. The EIR also fails to undertake an analysis of the urban decay that would be caused by big box sprawl, claiming that this would be "speculative." But if the EIR can project that big box sprawl will "capture" retail business *outside* the City of Salinas, it should be able to project the inevitable capture and cannibalization of retail business *within* the City.

LandWatch believes that externalities should be accounted for in land use policies. One way to do this is through Community Benefit Programs, which establish commercial linkage fees—for example job-housing linkage fees. Developers in many communities pay these to ameliorate some of the housing impacts generated by such projects.

LandWatch isn't alone with its concerns that the Salinas EDE proposes suburban sprawl on a scale that has never been seen in Monterey County. LAFCO, Monterey County, the Monterey County Agricultural Commissioner's Office and the Ag Land Trust have all written letters in opposition to the EDE and its EIR.

In addition to concerns with substance, LandWatch is concerned with process. The City released the final EIR less than a month after the close of the draft EIR comment period, and, as a result, the final EIR fails to provide reasoned responses to comments and objections. Indeed, the deficiencies and omissions we've identified in the Draft EIR could not be corrected in a Final EIR. To comply with CEQA, the City must revise and recirculate a Draft EIR that includes an objective analysis of an infill alternative, one that takes into account accurate job projections over a realistic planning period. Without an EIR that is comprehensive and fact-based, Salinas risks lawsuits and associated costs for years to come.

In sum, I ask that you

1. Reject the Final EIR
2. Develop an economic element that is more reasonable in scale and consistent with local and state laws.
3. Conduct a comprehensive infill analysis. LandWatch would be happy to assist with that.
4. Ensure the EDE acknowledges and mitigates the externalities it will generate.