



October 19, 2017

Lisa Brinton
Project Manager - Economic Development Element
Community & Economic Development Department
City of Salinas
65 W. Alisal Street, 2nd Floor
Salinas, CA 93901

Re: Comments of Salinas City Center Improvement Association on Draft Program Environmental Impact Report for draft City of Salinas Economic Development Element

Dear Ms. Briton:

Below are Salinas City Center Improvement Association comments concerning the Draft Program Environmental Impact Report for the draft City of Salinas Economic Development Element. As noted in the report, an environmental review of the draft City of Salinas Economic Development Element is necessary under the California Environmental Quality Act (CEQA) before the element is incorporated via amendment into the City of Salinas General Plan.

The Salinas City Center Improvement Association does not have any comments - supportive or critical - to the environmental review of the six "Target Areas" evaluated in the report. It can be argued that new development in the six Target Areas may have both positive and negative impacts on downtown Salinas. The report is correct to assert that "it would be speculative to assess potential for the proposed project to result in urban decay impacts" because "no information is currently available about the future individual project types that may locate" in the six Target Areas.

Rather, our concern is that downtown Salinas and the Downtown Vibrancy Plan for Economic Opportunity Area P were essentially ignored in discussions of "the potentially feasible alternatives to the proposed project that would meet most of the basic project objectives while reducing or avoiding one or more of the significant impacts of the proposed project."

Indeed, two out of the three photographs on the front of the Draft Program Environmental Impact Report depict downtown Salinas. (See attachment.) Yet increasing funding and speeding implementation of the Downtown Vibrancy Plan as an alternative is barely mentioned. There are

no references to the potential of Economic Opportunity Area P if the city's focus on the Downtown Vibrancy Plan was intensified.

As noted in the report, "the underlying purpose of the EDE is to provide additional land supply needed to meet long-term employment generation needs through General Plan buildout and to promote availability of new sites to support business growth through focused land use planning, targeted circulation, utility infrastructure improvements, and expanded resource availability." Evaluation of the Downtown Vibrancy Plan and the potential of intensive economic development/redevelopment in Economic Opportunity Area P would seem to be an obvious alternative to "a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation."

Such intensification would transform the Downtown Vibrancy Plan and infill development within Economic Opportunity Area P into an alternative in the Draft Program Environmental Impact Report, rather than current incorporation as part of the draft Economic Development Element. The report mentions that the "Purpose of the EDE" includes "Maintain the viability of the downtown in all of its components: mixed use, residential retail, entertainment, professional and commercial services, and government center." Some specific EDE Policy/Action Items listed in the report that are related to the Downtown Vibrancy Plan:

- "Policy ED-C-2.2 - Fund and implement the Downtown Vibrancy Plan recommendations and improve broader access to and within the downtown core area."
- "Action C-2.2.1 - Improve connectivity and vehicular/non-vehicular access within the downtown core area by implementing circulation and other connectivity-focused improvements identified in the Downtown Vibrancy Plan..."
- "Action C-2.2.3 - Revitalize the streetscape within the downtown core area consistent with recommendations in the Downtown Vibrancy Plan and secure dedicated sources of funding for maintenance."

There are several other purposes, policies, and actions related to the downtown area. What if city investments in these items was increased and accelerated?

It is notable that three parties that responded to the Notice of Preparation - LandWatch Monterey County, Building Healthy Communities East Salinas Land Use Action Team, and Ag Land Trust of Monterey County - asked the city to evaluate infill as an alternative. While these groups may not necessarily support infill development in downtown Salinas, their comments to the City of Salinas asking for robust analysis of infill as an alternative are valid.

In response, the City states that "the City received a comment on the NOP with a recommendation to consider an alternative that relocates new proposed development capacity within the Target Areas to infill sites within the City. The City elected not to evaluate this

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alternative in detail” because the draft Economic Development Element “already assumes that institutional and visitor-service sector employment needs will be met through substantial infill/revitalization within the city limits and new development within the existing SOI [Sphere of Influence].” No specifics are mentioned about the potential of the Downtown Vibrancy Plan.

Why does the Salinas City Center Improvement Association seek greater attention in the Draft Program Environmental Impact Report to the alternative of infill development and development of vacant land within downtown Salinas? We understand the history of downtowns in America, including in Salinas.

The danger of the city’s excitement and emphasis on the six Target Areas is that the Downtown Vibrancy Plan will get less funding and staff support when the next recession comes to the region. As the city focuses financial resources and staff on the six fresh new Target Areas, the Downtown Vibrancy Plan for Economic Opportunity Area P may become an afterthought. Economic Opportunity Area P may become the city’s convenient place to put the problems, as so often happens with downtown areas in American cities as new outer rings of development are cultivated.

Our intention is to avoid that fate. We believe city decision makers, their constituents, and responsible and trustee agencies need to be routinely and consistently reminded that there is a plan for economic development in downtown Salinas. The City should regard the intensification and acceleration of the Downtown Vibrancy Plan as a legitimate alternative plan for economic development activities and outline such a plan in the report.

Sincerely,

Kevin Dayton
Government Affairs Director
Salinas City Center Improvement Association

DRAFT PROGRAM EIR

City of Salinas Economic Development Element

State Clearinghouse No. 2015111036



Downtown Salinas (Economic Development Area P)

City of Salinas
September 1, 2017