

February 2, 2026

Taven Kinison Brown
Community Development Director
City of Gonzales
147 Fourth Street
Gonzales, CA 93926

RE: Notice of Preparation of a Draft Environmental Impact Report State Clearinghouse Number 2020039055 - Puente del Monte

Dear Mr. Kinison Brown,

I write on behalf of LandWatch Monterey County to comment on the January 8, 2026 Notice of Preparation (“NOP”) of a Draft Environmental Impact Report for the Puente Del Monte (“Project”).

1. **Project objectives in NOP project description.** The NOP fails to identify the Project’s objectives. An NOP must include the Project description; and a statement of objectives is required as part of a project description. (14 CCR §§ 15082(a)(1)(A), 15124(b).) The objectives are critical to the formulation of alternatives. (14 CCR § 15124(b).) An important purpose of early public consultation or scoping is to identify alternatives. (14 CCR § 15083(a).) Failure to include the Project objectives in the NOP is a prejudicial error because it denies the public the opportunity to propose alternatives for evaluation in the Draft EIR that are consistent with the Project objectives. The City should reissue the NOP with the project objectives provided.
2. **Project description – project objectives in DEIR:** Without waiving objections to the failure to set forth Project objectives in the NOP, LandWatch urges the City to include the following objectives in the Project description in the draft EIR:
 - a. to provide affordable housing;
 - b. to provide housing for the existing workforce in Gonzales and vicinity;
 - c. to balance the distribution of housing sites affordable to lower and moderate income families so that it is not concentrated in a single location;
 - d. to avoid becoming a bedroom community to Salinas, the Monterey Peninsula, and Silicon Valley;
 - e. to discourage low density suburban development with separate or car-dependent commercial services;

- f. to protect agricultural land and minimize urban encroachment onto farmland;
- g. to manage VMT and GHG through compact urban form and by minimizing vehicle use;
- h. to perpetuate a competitive development environment in which the urban growth area land is owned or controlled by a variety of interests.

These objectives are intended to fulfill express policies of the City's General Plan.

3. **Project description – description of units by affordability and tenure:** The DEIR must describe the housing units by their type (e.g., detached single family residential unit (SFR), attached SFR, town home, condominium, apartment), their projected affordability level (lower income, moderate income, workforce, market rate), and their tenure (rental or purchase) in order to support an analysis of the Project's consistency with the Housing Element and regional housing needs allocation (RHNA). The ability of the project to accommodate the City's RHNA is critical because it represents a substantial portion of the City's planned future residential development over the next 25 years. If the project cannot accommodate its proportionate share of the City's RHNA over its projected buildout, then the City will need to annex additional land elsewhere, which would trigger additional impacts to agricultural land. Failure to provide sufficient affordable housing would also create a mismatch in available housing for the City's low wage workers who would be forced to commute from other areas, increasing VMT and GHG impacts.

The DEIR must also make a reasonable projection of the number of parcels zoned for single family residential use that will be developed as duplexes and/or lot-splits under SB 9.

4. **Phasing plan:** The Specific Plan or its DEIR must provide a phasing plan that is sufficiently detailed to support determinations whether buildout of the project's revenue producing units (e.g., residential units paying impact fees) will enable funding of the water supply, wastewater, transportation, and drainage infrastructure required to mitigate project impacts. This will require assessment of market absorption of new units and a phasing plan for the construction of necessary infrastructure.
5. **Alternatives:** The DEIR must assess a reasonable range of alternatives focused on avoiding or reducing significant impacts. Because it is likely that the project, as proposed, will cause or contribute considerably to significant impacts to transportation, air quality, greenhouse gas, and agricultural resources, the alternatives evaluated should address these impacts.

First, the DEIR should evaluate a reduced scale alternative that would reduce the project size by 50%, which is closer to being consistent with actual housing needs for Gonzales over the next 25 years, particularly in light of the Vista Lucia Specific Plan and approved residential development projects in Salinas and Soledad. The reduction in footprint would reduce significant impacts to agricultural land.

Second, the DEIR should evaluate an increased density alternative that would require at least 40% of the residential units to be on sites zoned for a minimum density of 20 units per acre. Currently there are no areas within the project that would require a minimum density of 20

units per acre; the highest minimum density requirement is 15 units per acre because the project proposes ranges rather than minimums. And only 18% of the units are zoned at densities that would even permit the 20 units per acre Mullin density required for affordable units in Monterey County. Requiring 40% of the sites to be zoned for a minimum of 20 units per acre will ensure that the City is in position to provide affordable housing to its low wage work force and meet its RHNA commitments without having to annex additional territory and to provide a better match of housing to available jobs. Providing affordable housing to the City's low wage workers would help mitigate VMT and GHG impacts caused by the need to commute from other areas where housing is more affordable.

Third, the DEIR should evaluate an alternative that combines a 50% reduction in scale with a requirement that 40% of units be zoned for a minimum 20 units per acre.

Fourth, the DEIR should evaluate an alternative that would require provision of at least 20% deed-restricted units affordable to low and very low income households. Again, this alternative would reduce transportation impacts by making housing available to the City's low-wage workforce that must now commute from other areas.

Each of these alternatives would reduce impacts to transportation, air quality, greenhouse gas, and agricultural resources.

LandWatch appreciates the opportunity to comment. Please contact me if you have any questions.

Regards,

A handwritten signature in black ink, appearing to read "Michael DeLapa". The signature is stylized and cursive.

Michael DeLapa
Executive Director