



March 15, 2024

Taven Kinison Brown, Community Development Director
City of Gonzales, Gonzales City Hall
147 Fourth St
Gonzales, CA 93926
TKinisonBrown@ci.gonzales.ca.us

Re: LandWatch's comments on Vista Lucia Specific Plan Draft Environmental Impact Report

Dear Mr. Kinison Brown:

Despite almost tripling the size of Gonzales, the proposed Vista Lucia Specific Plan fails to meet the housing needs of the City's working families and individuals. Gonzales' median household income is \$73,906. To meet the needs of at least half of Gonzales' households earning less than the median income, half of the Vista Lucia units should be located in areas zoned for high density housing - that is, 20 units or more per acre. In addition, more units should be multifamily apartments rather than for-sale housing. Nevertheless, only 18% of the units are zoned for high density.

The failure of the Vista Lucia Specific Plan to meet the needs of Gonzales' working families is both a social justice and an environmental issue.

This mismatch between City's residents' incomes, housing densities, and housing types will perpetuate the need for low wage workers who live elsewhere to commute into Gonzales, and it will transform Gonzales into a bedroom community for commuters who work elsewhere. The environmental consequence is unnecessary and avoidable vehicle miles traveled, and associated greenhouse gas (GHG) and air pollutants. The social justice consequence is a failure to provide housing affordable to those who live and work in Gonzales, bypassing the needs of current residents in favor of the only market that can afford \$700,000+ single family homes- commuters.

The project should be revised to provide that half of the units are on sites zoned for densities that support affordable housing and to include a larger percentage of rental housing than for-sale housing. A significant reduction in VMT, made possible by matching housing to the local workforce, would enable the project to meet post-2030 goals for reduction of GHG. However, the EIR simply fails to demonstrate that it will meet the 2050 goal for GHG reductions that was adopted in the City's Climate Action plan and in the DEIR itself. The City cannot find that the project makes no considerable contribution to GHG impacts.

The project proposes to increase households in the City from 1,987 to 5,485 units by 2045, increasing the size of the City 2.7 times. This growth is not needed to meet the growth projected by the Association of Monterey Bay Area Governments (AMBAG), which did not anticipate that Gonzales would seek to transform itself into a bedroom community. But because this growth exceeds the growth planned by the Monterey Bay Unified Air Pollution Control District (MBUAPCD), the project will have a significant impact on its Air Quality Plan. Because the EIR fails to acknowledge this significant impact, it must be revised and recirculated.

The EIR fails to consider adopting increased density as a mitigation measure to reduce VMT despite the recommendation and evidence in the California Air Pollution Control Officers (CAPCOA) guidance document, which the EIR acknowledges as the standard reference source for VMT and GHG reduction measures. Where the EIR does consider an increased density alternative, it erroneously dismisses the VMT and GHG benefits without any analysis.

The DEIR also fails to assess mitigation of VMT by matching affordability levels to the household incomes of the local workforce. Again, the project should be redesigned to provide that at least half of the units would be affordable to the local households and workers earning less than the median income.

The EIR's alternatives analysis is flawed. Not only does it fail to acknowledge the VMT and GHG benefits of increased density, but it misidentifies the environmentally superior alternative. The discussion fails to acknowledge that Alternative 3, which reduces the project footprint by 138 acres by increasing its density, substantially reduces more significant impacts than Alternative 2, which reduces the project footprint by only 52 acres by reducing the number of units but retaining its overall low density. And, despite the obvious need to assess an alternative that increases density and reduces the number of units, the EIR simply ignores comments seeking this analysis.

Our detailed comments follow.

A. The Vista Lucia Specific Plan should be revised to provide that half of the units are on sites zoned at densities that support affordable housing.

Gonzales should plan for housing that will actually meet the affordability needs of those who live and work in the City. Half of Gonzales' population qualifies as lower income, earning less than 80% of the area median income. Yet only 18% of the units in the Specific Plan would be zoned at the 20 units per acre density that supports housing affordable to lower income households. (DEIR, p. 4-14, Table 4-1.)

Household median income in Gonzales is only \$73,906.¹ These households cannot realistically expect to purchase housing and they could not likely afford rental housing without vouchers or overcrowding – if, that is, rental housing were even available.

The failure to provide housing that is actually affordable to lower and moderate income households results in overcrowding and causes households to be housing cost burdened. Over 50% of renters in Gonzales are cost burdened.² 18% of households in Gonzales are overcrowded.

8% of Gonzales' households are Extremely Low-Income; 9.5% are Very Low-Income, and 28.1% are Low-Income.³ Thus, 45.6% of Gonzales' households are classified as lower income, earning less than 80% of the area median income. Another 6% of households earn only 80% to 100% of the area median income.⁴ The area median income for a family of four is only \$90,100.⁵ A household earning that median income would be cost burdened by housing that cost more than \$270,000. Households earning less – half of the City's households – could not afford even that housing cost.

If half of Gonzales' residents need housing affordable to lower income households, then the Vista Lucia Specific Plan should ensure that half of its new development is affordable to such households.

Housing affordable to lower income households should be zoned at densities of at least 20 units per acre, the "Mullin" density for Monterey County, in order to accommodate the economies of scale needed to produce affordable housing.⁶ Despite this, only 18% of the units – 640 of the 3,498 units

¹ City of Gonzales, Housing Element Update, Sixth Housing Element Cycle, 2024-2031, Public Review Draft, ("Draft HE"), Section 1, Table 2, available at https://cityofgonzales1-my.sharepoint.com/personal/aflores_ci_gonzales_ca_us/_layouts/15/onedrive.aspx?ga=1&id=%2Fpersonal%2Faflores%5Fci%5Fgonzales%5Fca%5Fus%2FDocuments%2FCity%20of%20Gonzales%20Housing%20Element%20Update%2FPublic%20Review%20Draft%2FGonzales%20Housing%20Element%20Public%20Draft%20Sections%201%2D3%2Epdf&parent=%2Fpersonal%2Faflores%5Fci%5Fgonzales%5Fca%5Fus%2FDocuments%2FCity%20of%20Gonzales%20Housing%20Element%20Update%2FPublic%20Review%20Draft.

² Draft HE, Section 5, p. 82, available at https://cityofgonzales1-my.sharepoint.com/personal/aflores_ci_gonzales_ca_us/_layouts/15/onedrive.aspx?ga=1&id=%2Fpersonal%2Faflores%5Fci%5Fgonzales%5Fca%5Fus%2FDocuments%2FCity%20of%20Gonzales%20Housing%20Element%20Update%2FPublic%20Review%20Draft%2FGonzales%20Housing%20Element%20Public%20Draft%20Sections%204%2D5%2Epdf&parent=%2Fpersonal%2Faflores%5Fci%5Fgonzales%5Fca%5Fus%2FDocuments%2FCity%20of%20Gonzales%20Housing%20Element%20Update%2FPublic%20Review%20Draft.

³ Draft HE, Section 5, Table 36, Figure 16.

⁴ Id.

⁵ Draft HE, Section 5, p. 12.

⁶ Government Code, § 65583.2(c)(3); HCD, Default Density Standard Option – 2020 Census Update, March 21, 2022, p. 3, available at <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/defaultdensity2020censusupdate.pdf>; HCD, Site Inventory Guidebook, May 2020, p. 13, available

– are on sites that are zoned at 20 units per acre and can therefore be expected to support housing affordable to lower income households. (DEIR, p. 4-14, Table 4-1.) The site plan and map should be revised to ensure that at least half of the units are on sites zoned to accommodate 20 units per acre.

Indeed, the City has had a long-standing General Plan policy and program to require that new development in specific plan areas, such as the proposed Vista Lucia Specific Plan, be provided in the proportion set out in the City's RHNA.⁷ Honoring this proportionality requirement would require that Vista Lucia design half of its units at densities that would make the units affordable to lower and moderate income households.

Designing this project with densities that can accommodate the City's current and future RHNAs is critical because the City looks to Vista Lucia as the locus of future residential growth for the City. Vista Lucia's 3,498 units represent 31 years of growth – roughly four RHNA cycles – at the 111 units per year growth rate projected by AMBAG.⁸ Unless the Specific Plan is revised to zone enough sites at high density to support future housing element cycles, the City may not be able to meet its 7th, 8th, and 9th Cycle RHNAs without completely redesigning the Vista Lucia Specific Plan or annexing yet more farmland. This is bad planning.

And, as set out below, providing housing that is actually affordable to those who work in the City has the environmental benefit of reducing vehicle miles traveled (VMT) and associated greenhouse gasses (GHG), since the City's lower wage workers would not have to commute from other locations where housing is affordable.

B. The DEIR fails to demonstrate that the project would meet the 2050 goal for emissions reduction adopted in the City's Climate Action Plan.

The City's Climate Action Plan (CAP) adopts emission reduction targets for 2020, 2030, and 2050.⁹ The 2050 target is based on the 2005 Executive Order No. S-3-05, requiring a reduction of 80% below 1990 levels by 2050.¹⁰ The DEIR acknowledges that the CAP is based on these emission reduction targets for 2020, 2030, and 2050. (DEIR, p. 10-2.)

https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf.

⁷ Gonzales General Plan, pp. IV-53, IV-82 [Policy HE-1.1, Implementing Action HE-1.1.1], available at <https://gonzalesca.gov/sites/default/files/2018-08/General-Plan-Housing-Element.pdf>.

⁸ AMBAG, Regional Growth Forecast, available at https://www.ambag.org/sites/default/files/2022-12/REVISED_PDFAAppendix%20A_2022%20RGF.pdf.

⁹ City of Gonzales, Gonzales Climate Action Plan, 2018 Update, Aug. 20, 2018, ("CAP"), Table CAP-6, available at <https://gonzalesca.gov/sites/default/files/2018-11/Adopted%202018%20Gonzales%20CAP%20Update.pdf>.

¹⁰ CAP, p. IV-1.

The DEIR calculates project GHG emissions as of the expected 2045 buildout and then concludes that GHG emissions from the project would be less than significant “based on consistency with the CAP.” (DEIR, p. 10-6.) In particular, the DEIR finds that the project implements the “applicable” reduction measures from the CAP.

The fundamental problem with this analysis is that it does not and cannot determine whether the CAP measures are sufficient to meet the 2050 emissions reduction goal adopted by the CAP and the DEIR. This is because the CAP itself fails to document emissions reduction attributable to the CAP measures past 2030. There is simply no evidence in the CAP or in the DEIR that the emissions reduction measures adopted in the CAP would be sufficient to meet the 2050 reduction target.

For each year, 2020, 2030, and 2050, Table CAP-6 calculates baseline emissions, new emissions from projected growth, total emissions, reductions achieved by statewide reduction strategies, and the additional local reductions that are needed to meet the adopted emissions reduction targets. For example, Table CAP-6 calculates that reductions attributable to the local CAP needed to meet its 2030 reduction target would be at least 29,553 tons. Reductions needed to meet the 2050 reduction target would be 71,250 tons. The CAP graphs the needed reductions over time in Figure CAP-5 and states that the “GHG reduction measures set forth in a later chapter will be tailored to meet this reduction target.”¹¹

In that later chapter, Table CAP-8 purports to calculate emissions reductions that would be achieved by 2030 through the adoption of ten specific emissions reduction measures for residential, commercial, transportation, solid waste, and government operations. Table CAP -8 shows that the City expected 2030 reductions attributable to these ten local CAP reduction measures to total 29,956 tons, which is 403 tons more than the 29,553 ton reduction target for 2030 set out in Table CAP-6. CAP Appendices B and C document how the 2030 reductions were calculated for each of these ten measures.

However, the CAP provides no calculation for the expected 2050 emissions reductions that would be attained by Local CAP measures for 2050. Table CAP-8 documents reductions only for 2020 and 2030. It does not provide any information about expected reductions from CAP measures in 2050. Nor are 2050 reductions calculated in Appendices B and C. In short, there is simply no evidence that the adopted CAP measures will achieve the needed 71,250 ton reduction to meet the adopted 2050 emission reduction target.

The DEIR also claims that emissions would be less than significant based “on showing additional progress toward meeting the Assembly Bill 1279 emissions reduction target.” (DEIR, p. 10-6.) The DEIR explains that the 2022 AB 1279 target requires net zero GHG emissions and an 85% reduction in human-induced emissions by 2045. (DEIR, p. 10-4.) The DEIR argues that because AB 1279 is so new, agencies have not had time to implement its reduction targets in their CAPs and “[c]onsequently, the CAP is considered to remain valid as a qualified GHG reduction plan pursuant to CEQA Guidelines Section 15183.5(b).” (DEIR, p. 10-4.) However, as discussed above, neither the

¹¹ CAP, p. IV-3.

CAP nor the DEIR provide any evidence that the CAP will attain the less stringent but long-standing emission reduction target for 2050, set out 19 years ago in the 2005 Executive Order No. S-3-05.

The DEIR proposes one additional measure, Mitigation Measures 10-2, that it argues will demonstrate “progress toward” the AB 1279 emissions reduction target. (DEIR, p. 10-8 to 10-9.) However, the DEIR does not quantify the effect of this measure, and, even if it did, there is still no showing that the project would meet the older, less-stringent emissions reduction target for 2050 adopted by the CAP and EIR.

The DEIR acknowledges that it took Mitigation Measures 10-2 from the Bay Area Air Quality Management District’s (BAAQMD) GHG reduction plan guidance (DEIR, p. 10-8), but it is careful to disavow reliance on “BAAQMD’s GHG reduction plan as the basis for evaluating GHG significance.” (DEIR, p. 10-9.) The reason for this disavowal is obviously that the project is inconsistent on its face with BAAQMD’s guidance because it fails to attain the needed 15% reduction in Vehicle Miles Traveled.¹² Indeed, the DEIR’s discussion of GHG significance admits that transportation emissions would be significant and unavoidable because the project’s VMT would not meet the 15% reduction threshold of significance. (DEIR, p. 10-9.)

In sum, because there is no evidence that the compliance with the CAP measures or with the additional mitigation measure would, in fact, ensure attainment of the adopted 2050 GHG reduction goal, there is no evidence to support the finding that GHG impacts are less than significant.

C. The DEIR erroneously concludes that the project’s air quality impacts are less than significant because it fails to acknowledge that the project proposes more housing units than expected by the air quality plan.

In its analysis of Impact 6-1, Conflict with Air Quality Plan, the DEIR concludes that “[s]ince the project is within the AMBAG projections for housing units, the proposed project is consistent with the air quality plan and would have no impact from conflict with the air quality plan.” (DEIR, p. 6-6.) The DEIR reaches the same conclusion with respect to cumulative air quality impacts. (DEIR, p. 20-7.)

These conclusions are based on the analysis in Appendix B that presents the number of new housing units estimated to be constructed in each five-year increment from 2025 to buildout in 2045. (DEIR, App. B, pdf page 3, MBUAPCD Consistency Determination Procedure Ver. 4.0.) The analysis is erroneous because the line 26 data for “proposed New Project DUs,” is not cumulative; instead, it reflects only the number of units to be built in each discrete 5-year period. As a result, the line 27 row for “TOTAL, New Project + Built & Approved DUs” fails to reflect the cumulative

¹² Bay Area Air Quality Management District, Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans, April 2022, p. 18, available at <https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-thresholds-2022/justification-report-pdf.pdf?la=en>.

total number of dwelling units in the City. In fact, the total number of dwelling units will greatly exceed the AMBAG projections. For example, the sum of the project's 3,498 units estimated to be built by 2045 and the City's existing housing stock of 1,987 units is 5,487 units, well in excess of AMBAG's projection of 4,626 units in 2045.¹³ (DEIR, App. B, pdf page 3.)

And, indeed, in the VMT analysis in Appendix F, the EIR admits that to determine the project's VMT, it was necessary to update the AMBAG Travel Demand Forecasting Model with the project's assumed 3,498 units and 15,391 population. (DEIR, App. F, p. 3.) Had the project assumptions been consistent with the AMBAG model assumptions, it would not have been necessary to update the model to project VMT.

The EIR must be revised and recirculated since new information reveals that the draft EIR fails to identify this significant impact.¹⁴

Again, the fundamental problem here is that the project proposes too many housing units in the wrong place.

D. The DEIR fails to consider effective VMT mitigation from increased density and provides no evidence to ignore CAPCOA's finding that increased density substantially reduces VMT.

The EIR acknowledges VMT impacts are significant but fails to propose adequate mitigation. The only mitigation measures proposed by the DEIR's VMT study are transit rerouting, transit stops, safe and well-lit access to transit, implementation of an on-street bicycle facility, and provision of a bicycle repair station. (DEIR, App. F, pp. 4-5.) The DEIR identifies some of these measures as included in the project design or identifies them as proposed mitigation. (DEIR, pp. 6-10 to 6-15.) The DEIR also identifies some other measures that have been included in the project design or Mitigation Measure 6-3, such as a pedestrian network, traffic calming, discounted transit passes, and end-of-trip facilities.

The DEIR reports that consideration was given to the VMT mitigation measures recommended by the California Air Pollution Control Officers (CAPCOA) in its 2021 Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, identifying CAPCOA's handbook as the "common reference source for such measures." (DEIR, p. 14-9.) However, the DEIR fails to consider the number one VMT mitigation measure recommended by CAPCOA, Measure T-1, Increasing Residential Density. CAPCOA reports that increased density can reduce VMT as much as 30% and that for each 1% increase in density there is a 0.22% percent decrease in VMT.¹⁵

¹³ The AMBAG 2022 Regional Growth Forecast projects that residential units will increase from 1987 in 2025 to 4,626 in 2045. (AMBAG, 2022 Regional Growth Forecast, p. A-37, available at https://ambag.org/sites/default/files/2022-12/REVISED_PDFAAppendix%20A_2022%20RGF.pdf.)

¹⁴ CEQA Guidelines, § 15088.5.

¹⁵ CAPCOA, Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, Dec. 2021, pp. 70-71, available at https://www.caleemod.com/documents/handbook/full_handbook.pdf.

CAPCOA illustrates the VMT reduction attainable by increasing the density of a typical large residential project. Laying out the formula, CAPCOA calculates that an increase in density from 9.1 du/ac to 15 du/ac would reduce VMT by 14.2%.¹⁶

The same analysis is applicable here. This project dedicates 452 acres to 3,498 units (DEIR, Table 4-2) for an overall density of 7.7 units per acre. Alternative 3 proposes to increase densities of the low and medium density residential areas by 33%, thereby reducing the residential acreage by 138 acres. (DEIR, Table 22-1.) This 138 acre reduction would reduce the total residential acreage from 452 acres to 314 acres without reducing the number of units. Thus, the overall density would increase from 7.7 units per acre to 11.1 units per acre. Applying CAPCOA's formula, this would reduce VMT by 9.7%.¹⁷

Even though the DEIR fails to consider increased density as VMT mitigation, it does purport to assess the effect of increased density on VMT in the alternatives analysis section. However, in the alternatives discussion, without providing any analysis, the DEIR dismisses the potential reduction in VMT from increased density as “minor” and “unlikely to avoid the significant unavoidable impact identified for the proposed project.” (DEIR, p. 22-22.) Incredibly, the DEIR's discussion concludes that the VMT from Alternative 3 would be “similar to the proposed project,” effectively denying any VMT benefit from increased density. (DEIR, p. 22-22, emphasis added.) The DEIR fails to provide any quantification of the VMT reduction attributable to Alternative 3 or to explain why its conclusion is so starkly divergent from the CAPCOA guidance otherwise identified as an authoritative source for quantifying VMT and GHG reductions.

In sum, the DEIR should have identified increasing the project density as an effective mitigation measure for VMT.

Furthermore, increasing density has an affordable housing co-benefit because denser, attached housing is more likely to be affordable by design than large lot detached units. As discussed below, providing more affordable housing units for local low-wage households would avoid commute trips for some workers who would otherwise have to commute into Gonzales from affordable housing located elsewhere.

E. The DEIR fails to assess mitigation of VMT by matching affordability levels to the household incomes of the local workforce.

The DEIR's VMT projections are based on the reality that occupants of the project would “commute outside Gonzales.” (DEIR, p. 14-10.) This is borne out by the City's 2024-2031 Housing Element update, which finds that “Gonzales has a high number of workers commuting in and out of the City,

¹⁶ CAPCOA, Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, Dec. 2021, p. 72.

¹⁷ Calculated as (11.1 du/ac less 7.7 du/ac) divided by 7.1 du/ac) times 0.22 = 9.7%.

with few residents working in the City.”¹⁸ The DEIR admits that the project would not change the “travel behavior” already assumed in the VMT modeling by AMBAG. (DEIR, p. 14-8.)

The Housing Element documents an extreme mismatch in the location of housing and jobs: 2,408 workers commute into Gonzales to work every day, 2,512 workers commute out of Gonzales to work elsewhere, and only 254 workers both live and work in Gonzales.¹⁹

The EIR acknowledges that a reduction in VMT depends on provision of local jobs for those who live in Gonzales, e.g., the hoped-for jobs in agricultural processing. (DEIR, p. 14-2.) But because the DEIR does not and cannot assume that these jobs will in fact materialize in sufficient numbers to substantially reduce VMT, the DEIR concludes that the project’s transportation impacts, measured by its failure to attain the needed 15% reduction in VMT, will be significant and unavoidable. (DEIR, p. 14-2.)

If the hoped-for agricultural processing jobs do materialize, it will be critical to VMT reduction that these jobs be matched with housing these low-wage workers can actually afford. The Housing Element acknowledges that “[t]here is a particular need for more moderate- and lower income housing units to support workers in agriculture, retail, manufacturing, and other lower-wage industries.”²⁰ Unless the project provides housing affordable to these low-wage workers, it will only aggravate the pattern of high-wage workers using Gonzales as a bedroom community from which to commute to jobs elsewhere, and low-wage workers commuting into Gonzales from more affordable housing elsewhere.

In sum, a fundamental problem with the project is that it provides the wrong kind of housing in the wrong place. The project provides expensive housing for commuters who will travel to areas where the high-wage jobs needed to afford that housing are located. The project will not provide sufficient affordable housing for local workers in low-wage jobs.

To address this problem and to mitigate VMT, the DEIR should propose mitigation that would increase the number and accelerate the provision of housing units affordable to very low and low income households. Affordable units would most likely be multi-family rental units.

F. The alternatives analysis is flawed because it fails to acknowledge that Alternative 3, which reduces the project footprint by 138 acres, substantially reduces more significant impacts than Alternative 2, which reduces the project footprint by only 52 acres.

In addition to the obligatory “no project” alternative, the EIR evaluates only two substantive alternatives. Alternative 2 is a 12% reduction in the number of units, with a concomitant 52-acre reduction in the project footprint, but without any change in the assumed density of development. (DEIR, pp. 22-10 to 22-17.) Alternative 3 is a 33% increase in density of the low density and medium density neighborhoods, with a 138-acre reduction in the project footprint, but without any change in the number of units. (DEIR, pp. 22-17 to 22-23.) The stated purpose of Alternative 2 is to

¹⁸ Draft HE, Section 4-5, p. 81.

¹⁹ Draft HE, Section 4-5, p. 82, Figure 29, Inflow and Outflow of Workers in Gonzales.

²⁰ Draft HE, Section 4-5, p. 80.

reduce a single impact, VOCs, whereas the stated purpose of alternative 3 is to reduce all impacts related to the overall footprint of the project or to project density. (DEIR, pp. 22-10, 22-17.)

The alternatives analysis comparison of Alternative 2 to Alternative 3 to identify the environmentally superior alternative is flawed. The EIR claims that Alternative 2 is superior because it “avoids a significant unavoidable impact (VOC emissions) and substantially reduces the significance of a greater number of significant impacts relative to Alternative 3, the Increased Residential Density alternative.” (DEIR, p. 22-23.) This conclusion is inconsistent with the DEIR’s own analyses.

Alternative 3 reduces the footprint of the project by 138 acres whereas Alternative 2 only reduces the footprint by 52 acres. The EIR’s discussion of impacts under Alternative 3 finds that its 138-acre reduction in the development footprint substantially lessens at least seven significant impacts related to the size of that development footprint, including aesthetics, agricultural resources, construction emissions of fugitive dust and TACs, biological resources, cultural and tribal resources, hazards and hazardous materials, and on-site wastewater conveyances construction. While Alternative 2 would reduce these footprint-determined impacts somewhat, it would not do so to the same extent as Alternative 3 because it does not reduce the footprint as much.

Alternative 2 would only attain greater impact reductions for three impacts, where impacts are determined by population or dwelling units rather than by development footprint. This includes only VOC emissions, traffic noise, and water demand.

Thus, by its own analyses, the EIR demonstrates that Alternative 3, would result in the greater number of reductions to significant impacts “relative to” Alternative 2. It is simply not true that Alternative 2 “substantially reduces the significance of a greater number of significant impacts relative to Alternative 3.” (DEIR, p. 22-23.) The EIR’s own analysis shows that increasing the density of the project is more effective at reducing impacts than reducing the unit count.

G. The DEIR fails to evaluate a reasonable range of alternatives because it fails to assess an alternative that increases density and reduces the number of units.

The analysis of Alternative 2 and Alternative 3 show that some impacts are reduced by reducing the development footprint and some by reducing the unit count. As LandWatch requested in its NOP comments, the DEIR should have evaluated an alternative that reduces the unit count and increases the density, i.e., one that reduces the number of units to reflect the actual housing needs of local workers and increases the project density to provide the kind of housing that local workers could afford. (DEIR, App. A, pdf page 61.) This alternative would realize the benefits of both Alternative 2 and Alternative 3, reducing significant impacts across the board. The DEIR provides no justification for declining to evaluate this obvious alternative.

In conclusion, LandWatch requests that the City redraft and recirculate an updated EIR that addresses the failures and inconsistencies identified herein.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. DeLapa". The signature is fluid and cursive, with the first name "Michael" written in a more legible script, followed by "D." and "DeLapa" in a more stylized, connected cursive.

Michael D. DeLapa
Executive Director