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monterey county

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March 16, 2002

J.M. Romo, Mayor
City of Greenfield
Greenfield City Hall
45 El Camino Real
Post Office Box 127
Greenfield, CA 93927

[Sent By FAX: 831-674-3149]

RE: Preliminary Comments on Greenfield General Plan

Dear Mayor Romo and Council Members:

This letter is to provide some preliminary comment on the Greenfield General Plan Update process. Because the Council will soon be addressing it, I want to comment in particular on the "Study Area" map that the Council will officially consider at its meeting on March 19, 2002. I also want to provide comments stimulated by my attendance at a public workshop held in Greenfield on Thursday, March 14, 2002.

Comments on the Map To Be Considered By The City Council on March 19th

I was in attendance at the Planning Commission meeting held on Monday, March 11th, during which the Planning Commission acted to recommend a "Study Area" map to you. It seemed to me that there might have been some confusion about what the recommended map was really supposed to be used for, particularly since the Planning Commission agenda referenced a proposed "Growth Boundary Map for Use in the County of Monterey's General Plan Update." Three different map-related concepts were mentioned during the Planning Commission meeting:

1. The need for a map to delineate the General Plan "Study Area," to be used in initiating the City of Greenfield General Plan Update process.
2. The need for a map to provide the Local Agency Formation Commission (LAFCO) with an indication of what the City would see as a probable "Urban Growth Limit" during the next 15-20 year period. [LAFCO specifically asked the City to provide such a map, when the Commission recently heard a presentation by the City of Greenfield on possible future annexations].
3. The need for a map to provide to the County of Monterey, for the County's use in its own GPU process. [As you probably know, the County's draft General Plan suggests that most new growth in Monterey County should be directed to the cities. The County would

like to work with the cities to designate areas suitable for future growth, and have asked for a preliminary “map” from each city, to use as the basis for future discussion].

The map recommended to you by the Planning Commission, and that you will consider on March 19th, might be appropriate as the delineation of a “Study Area” to be used in initiating the City’s own General Plan Update. Such a “Study Area” map would not be seen as a map indicating where new growth should actually go, but would only indicate an area that should be “looked at,” to see what growth within the area is actually desirable. The area designated on a “Study Area” map would be “studied” for possible future growth, but it would be expected that some—or even most—of that “study area” would ultimately be determined to be not appropriate for new growth during the next 15-20 year planning period.

LandWatch urges the Council, if it adopts the Planning Commission map as recommended, to adopt that map only as a “Study Area” map, to indicate the areas that should be “studied” for possible future growth. As the City’s General Plan Update process moves ahead, LandWatch hopes that the Council will be prepared to reduce, significantly, the extent of the area that the Council ultimately decides is appropriate for future growth, based on the “study” that will accompany the General Plan Update process. Please see our comments in the next section of this letter as to why extensive new growth beyond the current boundaries of the city may not be either desirable or necessary.

LandWatch does not believe that the map recommended to you by the Planning Commission is appropriate to submit to LAFCO, or to the County of Monterey, in response to the requests that both LAFCO and the County have made for a “Growth Boundary” map for the City of Greenfield. Again, our comments in the next section of this letter outline the reasons we believe that extensive new growth beyond the current boundaries of the city may well not be either desirable or necessary.

LandWatch Monterey County and Common Ground Monterey County have recently issued a joint statement on conservation and development principles that we think should govern future growth within Monterey County. A full copy of our joint statement, including associated maps, has been provided to the City. A copy is also available on the LandWatch website, at www.landwatch.org.

The maps included with our joint statement outline areas that our two groups believe “include more than sufficient land to accommodate development over the next twenty years.” A copy of the LandWatch—Common Ground map for the City of Greenfield is attached to this letter. We urge you to submit a map based on the LandWatch—Common Ground map to LAFCO and the County of Monterey, in response to the requests that you have received from them. We think that this map does, indeed, indicate land that is “more than sufficient” to accommodate future development in Greenfield over the next twenty years. In fact, LandWatch is individually continuing to work on issues related to the land needed for future growth, and may well have further recommendations as your General Plan Update proceeds. At this time, however, we hope that the Council will take seriously the recommendation that Greenfield should use the LandWatch—Common Ground map as the basis for responding to LAFCO and Monterey County.

Comments on The General Plan Update Process

The City's GPU consultant urged persons in attendance at the March 14, 2002 General Plan Update workshop to submit written comments to the City, so that these comments can be considered as work on the Greenfield General Plan Update proceeds. Based on the workshop presentation, LandWatch has the following comments at this time:

1. LandWatch urges the Council to employ standard and approved planning procedures in the preparation of its General Plan Update, as generally outlined below. By following such standard procedures, the City will actually save both time and money, because the legal requirements contained in state law will more likely be achieved if such procedures are followed. If standard procedures are not used, the resulting General Plan document may be subject to legal question, which could mean the need to do a costly "reworking" of the final product.

Typically, a General Plan Update process begins with a study of existing conditions. An "Existing Conditions" report is prepared as the first step in the process. This report then provides a good basis for discussing possible changes. Both the County of Monterey and the City of Salinas have initiated their GPU processes in this way, so members of the Greenfield City Council can obtain copies of the Salinas and County reports to get an idea of what such an "Existing Conditions" report looks like. Such reports always contain a good deal of quantitative information—for instance, a definition of current population, population projections, the amount of land currently devoted to various uses, and so forth.

After an "Existing Conditions" report is prepared, and made available to all persons interested in the GPU process, it is then standard procedure to solicit ideas for what the new General Plan should look like. When the process is carried out in this manner, "new ideas" can be measured against existing conditions, so that the scope and effect of possible changes will be clear. This stage might be called the "vision" stage.

After ideas for changes are solicited from the public, the standard procedure then calls for the City Council to adopt a "Preferred Alternative," and to direct the preparation of an integrated draft General Plan Update. A draft Environmental Impact Report is also, ordinarily, prepared at this time. By preparing an integrated draft plan, with its accompanying environmental document, all interested persons are able to see, in total, what is being proposed, to compare the proposed new General Plan with the current conditions, and to review the possible environmental impacts of the draft plan.

After the draft plan and draft EIR are released, standard procedure is to request public comments on both the draft GPU and the draft EIR. The Planning Commission typically holds one or more hearings on the draft documents, and makes recommendations for changes. The City Council also holds one or more hearings. Then, based on the comments received on both the draft GPU and the draft EIR, and based on the Planning Commission recommendation, a final recommended plan, and a Final EIR are then prepared. The Planning Commission holds one or more hearings on the proposed final document, and then makes a recommendation to the City Council. The Council holds one or more hearings and takes final action to adopt the final General Plan Update.

Unfortunately, it does not appear that the Greenfield General Plan Update process is currently following standard planning procedures. The March 14th workshop was aimed at what might be called developing a new "vision" for Greenfield, but no information on existing conditions was available, and it is apparently not contemplated that any such

information will be prepared prior to proceeding to drafting the new General Plan Update. The City's GPU consultant indicated that the purpose of the workshop was to collect ideas about what the future of the City should be, and said that he intended to proceed directly from this "vision" stage to preparing draft elements of the General Plan. Further, the City's consultant indicated that he intended to prepare the draft General Plan on an "element by element" basis, rather than as in integrated whole.

LandWatch believes that the City Council should adopt a specific "workplan" and "timeline" for the General Plan Update process, conforming to standard planning procedures. Roughly, this workplan should include:

- Preparation of an "Existing Conditions" report, containing a quantitative analysis of the current conditions within the City.
 - Preparation of a range of possible alternatives for the new Greenfield General Plan (one of which could well be the kind of vision for large scale new development presented by the City's GPU consultant at the March 14th workshop), relating the various alternatives to the quantitative information documenting current conditions, so that the impact of the alternatives can actually be understood.
 - Public hearings to get comments on the "Existing Conditions" report and the proposed alternatives, to be followed by a recommendation from the Planning Commission (and then action by the City Council) to select a "Preferred Alternative" to use as the basis for preparation of the draft General Plan Update document.
 - Preparation of a draft GPU, based on the "Preferred Alternative" selected by the City Council, with that document to be prepared in an "integrated" manner.
 - Preparation of a draft EIR on the draft GPU.
 - Public hearings on the Draft GPU and Draft EIR, and City Council action directing changes to these documents, based on the comments received.
 - Preparation of a final EIR, reflecting the direction from the City Council.
 - Preparation of a final GPU, reflecting the direction from the City Council.
 - Public hearings at both the Planning Commission and City Council, followed by final adoption of a new General Plan.
2. The "vision" presented by the City's GPU consultant, consisting of a single aerial photograph, and no written analysis or text, recommends a massive expansion of the City of Greenfield. The diagram presented at the March 14th workshop suggests development in an area that appears to be about five times the size of the current city. Because no quantitative information was available, it was hard to understand all the implications of the proposed diagram, but it appeared that the consultant's proposal was for "Mixed Highway Commercial" development in an area roughly the size of the existing city. This seems unrealistic and disproportionate. Major new physical facilities were proposed, including an airport, rail lines, and a hospital, with no analysis of how such proposed uses might impact the existing city and the lands proposed for such uses. No financial analysis

was included, either. While the City's GPU consultant mentioned that existing agricultural land conservation easements are a factor in future development plans, such agricultural easements were not mapped, and it is likely that some of the proposals in the consultant's diagram conflict with such existing easements.

3. No quantitative measurements were available with respect to the diagram presented by the consultant, but it appeared that large amounts of agricultural land were proposed for conversion to non-agricultural uses. LandWatch hopes that the City Council will not pursue this "vision" for future development without a rigorous and thorough analysis. We believe that one of the City's major objectives should be to minimize, to the greatest degree possible, the conversion of agricultural land. As Council Members undoubtedly know, agricultural land in the Salinas Valley has an incredible economic value. Each acre of agricultural land generates, on the average, \$10,000 per year in gross income. Public costs are low. Without a quantitative analysis of existing conditions, proposed changes, and alternatives, it will not be possible for the City Council to make informed and appropriate decisions with respect to the possible conversion of agricultural land.
4. Agricultural land is to the agricultural industry of the Salinas Valley what business buildings and factories are to the high technology industry of the Silicon Valley. A person proposing to tear down Silicon Valley factories to put up subdivisions would not be considered to be making a very credible suggestion, because that would mean using productive land for uses that generate net public costs. The exact same analysis needs to be done whenever proposals are made to pave over agricultural land. This land only looks vacant. In fact, it is the foundation of the most important local industry, and while it may be necessary to "sacrifice" some agricultural land, to provide for other uses, a basic rule of good sense is that this conversion should be minimized. The consultant's work, so far, does not demonstrate any analysis of the economic and other impacts of the vast agricultural land conversions that his diagram proposes.
5. One way to minimize the conversion of agricultural land is to use land more efficiently. During the period from 1984 to 1996 (when Monterey County was growing relatively slowly) each 1,000 new persons moving to Monterey County resulted in the conversion of 159 acres of land (mostly agricultural land) to urban uses. This is an "inefficient" use of land. In San Benito County, during the same period, each 1,000 new residents required the conversion of only 109 acres. In Santa Cruz County, also during the same period, each 1,000 new residents required the conversion of only 40 acres. The "intensity of use," or "efficiency of use," of the land to be added to the City of Greenfield will affect how much land needs to be converted from agricultural to urban use, to accommodate the uses that the City desires to provide. The consultant's diagram proposes the conversion of vast amounts of agricultural land, and the amount proposed for conversion should be quantified, so the Council and the public can understand the scope and economic affect of what is being suggested. When the quantity of land proposed to be converted is known, the Council can then consider how similar uses might be accommodated on fewer acres, by using the land more efficiently.
6. So far, the consultant's work does not relate expected population growth to the land proposed to be converted. The City Council should demand that the General Plan Update begin with a consideration of future population—either as AMBAG or other agencies project, or as the City determines it wants to attract. Then, the land proposed to be set aside for new residential development can be matched to expected or proposed population growth. The consultant's current methodology is proposing to set aside large

amounts of land for residential development with no analysis of how much growth that land would accommodate, using different possible patterns of development. Since residential development usually ends up “costing” the community more money than it generates, it is critically important, as a matter of local economics and public finance, that the proposed land uses and the proposed population figures be quantified and analyzed together.

Thank you for considering these preliminary comments on the City of Greenfield General Plan Update process. LandWatch will continue to participate in the process as it goes forward. We hope, as indicated in this letter, that the City will take the time, at the start of the process, to make sure that the process is “done right,” according to standard planning procedures, to eliminate problems and difficulties later on. Naturally, LandWatch would be happy to help in any way we can.

Very truly yours,

A handwritten signature in black ink, appearing to read "G. Patton", with a stylized, cursive script.

Gary A Patton, Executive Director
LandWatch Monterey County

cc: Greenfield Planning Commission
Greenfield Planning Director and Building Official
Zak Gonzalez, Advanced Developments
Monterey County General Plan Update Team
Monterey County LAFCO
Common Ground Monterey County