



Post Office Box 1876, Salinas, CA 93902

Email: LandWatch@mclw.org

Website: www.landwatch.org

Telephone: 831-422-9390

FAX: 831-422-9391

September 2, 2003

John P. Huerta, Jr., Mayor
City of Greenfield, Greenfield City Hall
45 El Camino Real
Post Office Box 127
Greenfield, CA 93927

[Letter Only Sent By FAX: 831-674-3149]

Rodney Evans, Chair
Greenfield Planning Commission
Greenfield City Hall
45 El Camino Real
Post Office Box 127
Greenfield, CA 93927

RE: Comments on Land Use Element of Greenfield General Plan

Dear Members of the Greenfield City Council and Greenfield Planning Commission:

I understand that the Planning Commission will soon be considering the Public Review Draft of the Land Use Element of the City of Greenfield General Plan Update (dated July 14, 2003). I also understand that the City Council will consider this document after the Planning Commission has completed its review. This letter is to provide some preliminary comments on the Draft Land Use Element. LandWatch also wants to comment on the procedural status of the General Plan Update process, with specific reference to the requirements of the California Environmental Quality Act (CEQA).

Comments on the Status of the General Plan Update and the Requirements of CEQA

As you know, the California Environmental Quality Act requires the City Council to prepare and consider an Environmental Impact Report prior to taking any action that "might" have a significant impact on the environment. Adoption of a new General Plan is the kind of action that might have such an impact, and the preparation of an EIR is therefore legally required, before the City can adopt any significant amendment to its current General Plan.

I believe that the City Council, the City staff, and the City's consultants are all aware of this requirement, and that the current General Plan Update process is proceeding without any environmental review mainly because financing issues would make it difficult or impossible for the City to comply with CEQA at this time. While I am sympathetic with the City's financial problem, the fact that the City has limited financing does not relieve the City of the requirement to comply with CEQA.

Since the City cannot take any "action" that might affect the environment until CEQA review is completed, it is important to understand that any "approval" by the City Council of any of the text, policies, maps, or tables in the Draft Land Use Element cannot be used, in any way, with respect to future planning decisions made by the City—or by any other agency. This includes decisions relating to the proposed Sphere of Influence of the City. Unless and until a new, internally consistent General Plan Update has been adopted, after a full environmental review, all such planning decisions will have to be made on the basis of the City's current General Plan, and without reference to the Draft Land Use Element that is now being considered.

This may be very clear to the City; however, I do think the importance of this must be emphasized, since once the document on which you are working has been fully reviewed by the Planning Commission, and then given some sort of approval by the City Council, there will be a temptation to utilize the document as a kind of statement of City policy that should guide future decisions. This cannot legally be done. Because it can't, I hope the Council will reconsider its current process. The Planning Commission and the Council are spending a good deal of time, as are interested members of the public, in reviewing the Draft Land Use Element. Because, however, no environmental review is being undertaken, and because the other elements of the General Plan are not being considered simultaneously, the current process will have to be completely "redone" when all the necessary General Plan elements are available, and when it is possible to do a full environmental review of the integrated document. In a letter dated, March, 16, 2002, LandWatch urged the City to "employ standard and approved planning procedures in the preparation of its General Plan Update." That is still our recommendation, which we believe will ultimately save the City money, since it will eliminate the need to do things "twice."

As you will see from our comments, below, LandWatch believes that the Council ought to make some *fundamental* changes to what is proposed in the Draft Land Use Element. The environmental review required by CEQA would be extremely helpful to the Council in deciding whether or not to pursue the path recommended in the current Draft (which contemplates a huge amount of growth for the City of Greenfield), or whether the Council should choose another, smaller-growth alternative (as recommended by LandWatch).

Again, in order to make good decisions about these fundamental questions, the Council really does need to consider a fully-integrated document, with all the different General Plan Elements included, and it needs to undertake the environmental review required by CEQA. Failure to follow the "normal" process will result in a document that has no "status" except as part of a subsequent document that will contain a full General Plan Update, with all required elements, and upon which the legally required environmental review will be undertaken.

Specific Comments on the Draft Land Use Element

LandWatch has the following specific comments about the Public Review Draft of the Land Use Element of the City of Greenfield General Plan Update, dated July 14, 2003:

1. On Page 2-2, the draft document says that “growth projections were based on 2000 Census data, historical growth rates, and pending and proposed development projects.” Better analysis is required, and this would be done in a full EIR. How, for instance, do the projections utilized in this draft compare to the official projections done by the Association of Monterey Bay Governments? LandWatch believes that the growth projections upon which the Draft Land Use Element is based are unrealistically high, and do not conform to AMBAG’s regional forecasts. This fundamental issue should be clarified prior to any action by the City on the proposed Draft Land Use Element.
2. The text on Page 2-2 says that the Land Use Element is intended to result in an overall growth pattern of “compact development.” However, Figure 2-3 seems to indicate that the proposal is to more than double the size of the existing city. The Draft Land Use Element, in other words, is internally inconsistent. LandWatch strongly urges the City to reconfigure Figure 2-3, and change the text as necessary, to establish a proposed planning boundary that will truly result in compact growth, and that will designate lands for future growth that are consistent with official population forecasts.
3. LandWatch also suggests that the City should analyze how much land would be needed to accomplish expected growth by looking at several different “scenarios,” using different average densities for future residential development. This is the kind of analysis that would be required in a full EIR. As shown in an attachment to this letter, LandWatch has done its own analysis, based on the official AMBAG forecast, and contained in our publication, *Room Enough*. That analysis shows that Greenfield will only need to add 46 acres to accommodate the future growth called for by AMBAG. A full copy of the *Room Enough* report has previously been provided to the City, and can be found on our website at:
<http://www.landwatch.org/pages/publications02/roomenough/roomenough.pdf>.
4. The statement on Page 2-2 that “reserve” areas should “not be developed until almost all non-reserve land...has been developed” is not implemented by any appropriate policies with the Draft Land Use Element.
5. Page 2-3 indicates that there is to be a “Growth Management Element” in the updated General Plan. This comment illustrates the difficulty of evaluating the Draft Land Use Element without all other General Plan Elements being present. Perhaps, the “Growth Management Element” will address some of LandWatch’s main concerns. Until it has been prepared, and its relation to the Land Use Element made clear, it is impossible properly to evaluate the Land Use Element.
6. Apparently, the “Growth Management Element” is to address only infrastructure. LandWatch urges that it more generally examine proposed new growth, and specifically

that it address the relation between new residential growth and new housing growth, and find a way to link the two. Absent such a policy, residential demand exported from areas to the North, including the Silicon Valley, will turn Greenfield into a bedroom community, with the jobs located elsewhere. That is an extremely predictable result of the Draft Land Use Element in its current form. LandWatch thinks that Greenfield should not plan to become a bedroom community, and that it is therefore vitally important that various “growth management” measures be integrated into the new General Plan Update.

7. Figure 2-1 mislabels the red dotted line, by calling it “Sphere of Influence.” In fact, the current Sphere of Influence for the city is significantly smaller. The real Sphere of Influence should be shown on the map, the red dotted line renamed. Either “Planning Area,” or “Proposed Sphere of Influence” might be appropriate, but “Sphere of Influence” is simply inaccurate.
8. Figure 2-1 indicates that the city has plans for significant expansion to the “East” of Highway 101. Submitted to the city some time ago was a proposed schematic growth map approved jointly by LandWatch Monterey County and Common Ground Monterey County. A copy of this map can be viewed on the LandWatch website, at: <http://www.landwatch.org/pages/landwatchnews02/greenfieldmap.jpg>. The LandWatch-Common Ground diagram shows a more limited growth footprint, and indicates that growth should be limited on the East side of Highway 101, and directed, for the most part, to areas on the West side of the highway. This option should be analyzed—as would be required in a full Environmental Impact Report.
9. Acreages should be shown for the various mapped areas. While Page 2-12 says that there are approximately 1,000 acres within the existing city (and that 333 acres are undeveloped), this is not shown on the map, and it is specifically not clear how many acres are outside the current city limits, but inside the red dotted line, in the inaccurately named “Sphere of Influence.” LandWatch believes, based on an “eyeball” guess, that the proposal is to more than double the size of the current city. This seems particularly problematic if approximately 32% of the existing city is undeveloped. We believe that growth at this scale would have many adverse environmental, economic, and social impacts, and that the city should plan for less, and more compact, growth.
10. Page 2-7 says that the “City’s vision is to retain its rural community character.” LandWatch thinks that this is a good goal, but that this is incompatible with the actual text and maps contained in the Draft Land Use Element. In its current form, the Draft Land Use Element is a prescription for massive commercial and residential development that will completely change the “rural community character” of Greenfield—and that will, incidentally, probably lead to significant financing problems for the city.
11. Page 2-8 calls for “an improved jobs/housing balance.” To achieve that, the city must adopt General Plan policies that will tie new residential growth to new industrial and commercial development within the city. This *can* be done; however, the current draft does not achieve this. As presented, this is a plan to turn Greenfield into a bedroom

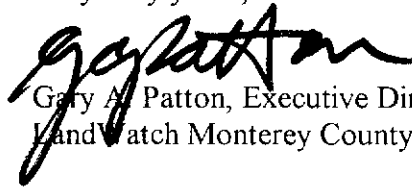
community, serving the residential needs of those with jobs to the North, who are looking for housing that is less expensive than in the communities in which they work.

12. Page 2-8 notes the need for “affordable housing.” In order to make sure that future speculative market increases don’t make new housing in Greenfield ever more unaffordable, Greenfield should place a strong inclusionary housing requirement into its General Plan. The City of Salinas is currently considering a 40% inclusionary requirement, which an independent economic study shows is feasible. Greenfield should consider a comparable requirement.
13. The statement on Page 2-9 that “Greenfield is committed to compact city growth and the goals, policies and programs in this document are intended to further this objective” is not supported by the document itself.
14. On Page 2-10, the Draft Land Use Element said that regional shopping centers should “be developed with community character in mind.” The Land Use Element should actually contain policies and programs that accomplish this objective. Further, an analysis is needed of how much acreage is actually needed for regional shopping centers (and how much is provided). It is LandWatch’s impression that the amount of land provided in the Draft Land Use Element (again, acreages are needed) is vastly disproportionate to the need, or to likely demand.
15. The city should not only establish “maximum” densities but also “minimum” densities for each of its residential categories. The City of Salinas has done this, in its recent General Plan Update. Adopting minimum densities will help preserve affordable housing opportunities, by preventing the “underutilization” of residentially-zoned lands. Salinas establishes a minimum density of 6.0 du/acre for low-density residential, 9.0 du/acre for medium-density residential, and 16.0 du/acre for high-density residential. LandWatch recommends that Greenfield include a comparable minimum density requirement.
16. The “Goals, Policies and Programs” found on Page 2-25 and following are not “specific” enough to set enforceable standards for future development. With the original of this letter, I am enclosing a copy of “Land Use and the General Plan.” This recent LandWatch publication explains how non specific General Plan language simply defers policy decisions to the “project” level. The key General Plan policies that Greenfield wants to insure are implemented should be contained in very specific policy language within the General Plan.
17. LandWatch believes that Greenfield should include a specific requirement that “Traditional Neighborhood Design” principles be employed in all new developments within Greenfield. A very good set of policies has recently been adopted by the City of Salinas. Inclusion of such policies within the Greenfield General Plan would significantly improve the design of new neighborhoods.

18. LandWatch also believes that the City of Greenfield should include in its General Plan most of the “city” policies outlined in “Land Use and the General Plan,” including a policy giving local residents the “first option” to rent or own newly constructed residential units built in Greenfield. These policies would significantly strengthen the current draft.

Thank you for considering these preliminary comments on the City of Greenfield Public Review Draft of the Land Use Element. 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 "Gary A. Patton".

Gary A. Patton, Executive Director
LandWatch Monterey County

cc: Pacific Municipal Consultants

PRIME AGRICULTURAL LAND REQUIRED – Room Enough Report

Salinas Valley Jurisdiction	DU Needed in and Beyond SOI	Total Acreage Required	SOI Prime Ag Acres Required	SOI Non-Prime Ag Acres Required	DU Required Outside SOI	Prime Ag Acres Required Outside SOI	Non-Prime Ag Acres Required Outside SOI
Gonzales	1,392	170	170	n/a 2	0	0	0
Greenfield	375	46	46	n/a 2	0	0	0
King City	2,739	334	n/a 2	298	296	0	36 1
Salinas	6,149	750	416	33	2,468	301	n/a 2
Soledad	1,456	178	179	n/a 2	0	0	0
Totals:	12,111	1,477	811	331	2,764	301	36
Total Prime Ag Land	Required:	1,112					

1 Provided property toward Pine Canyon is selected. Other property would be prime ag land.

2 n/a means "not available"