

CHAPTER

10

ENVIRONMENTAL
REVIEW

(FINAL EIR CERTIFIED MAY 31, 2005)

E

EXECUTIVE SUMMARY

This summary of the EIR is provided pursuant to CEQA Guidelines Section 15123. The summary provides an overview of the proposed action, significant effects, mitigation strategies, alternatives, and potential areas of controversy. For additional detail regarding specific issues, please refer to the appropriate section of this EIR document.

S.I Summary of the Proposed Action

The Greenfield General Plan was last updated in 1983. The existing General Plan is outdated and does not accurately reflect current conditions, growth trends, or the future vision of the community. This General Plan update provides a 20-year blueprint for the future growth of the community, providing guidance for the 2005-2025 time period.

The Land Use Element (Chapter 2.0) is the core of the General Plan and is typically the element most frequently consulted. The Land Use Diagram (General Plan Figure 2-3) designates land uses for all lands within the City and its future growth area and visually depicts the community's intended physical form and areas for growth. The Land Use Diagram is supported by text that describes building intensity, population density, and development expectations of the Greenfield community. The framework of Goals and Policies will guide the community's decision making throughout the term of the General Plan. The element also identifies implementation actions or programs that will be required to bring about the development envisioned in the Land Use Plan.

The General Plan and corresponding EIR are an integrated document. The goals, policies and programs of the General Plan, through design, are intended to serve as the project's "mitigation measures" for the purposes of CEQA review. Throughout the EIR, the mitigation section refers back to the policies and programs of the General Plan.

The General Plan would increase the size of the City by approximately 1,300 acres. The land uses proposed would support a population of 36,000 people, residing in over 10,000 households, assuming maximum allowable density. Please refer to **Figure 2-3** for the Land Use Diagram. **Table S-1** summarizes the land uses proposed.

**Table S-1
Land Use Diagram Acreages (with Overlay Designations)**

Land Use - Overlay	City Limits	Future Growth Area*	Total
Residential Estate	0.00	39.09	39.09
Residential Estate - Reserve	0.00	65.68	65.68
Low Density Residential	392.05	151.45	523.50
Low Density Residential - Reserve	0.00	42.13	42.13
Medium Density Residential	198.70	95.32	294.02
Medium Density Residential - Reserve	0.00	43.17	43.17
High Density Residential	20.10	0.00	20.10
Neighborhood Commercial Center	2.32	5.08	7.40
Downtown Commercial – Mixed Use	22.61	0.00	22.61
Downtown Commercial – Mixed Use - Gateway	10.86	0.00	10.86
Highway Commercial – Mixed Use	5.93	0.00	5.93
Highway Commercial – Mixed Use - Gateway	13.11	0.00	13.11
Highway Commercial – Regional Commercial Center Design	63.48	90.01	153.49
Professional Office – Mixed Use	22.44	0.00	22.44
Artisan Agricultural and Visitor Serving	0.00	205.38	205.38
Artisan Agricultural and Visitor Serving - Gateway	0.00	113.39	113.39
Artisan Agricultural and Visitor Serving - Reserve	0.00	107.77	107.77
Light Industrial	2.38	36.94	39.32
Light Industrial – Industrial Park	89.98	0.00	89.98
Highway Industrial	0.00	296.30	296.30
Public Quasi Public	201.34	60.00	261.34
Recreation and Open Space	8.96	49.11	58.07
TOTAL	1,054.26	1,380.82	2,435.08

* Future growth acreages include projected school acreages (60 acres) and regional park acreages (30 acres) not specifically identified on the land use diagram.

This environmental review chapter, in combination with several other elements of the General Plan document, serves as the Draft Environmental Impact Report (DEIR) for the project and provides the environmental information and analysis and primary CEQA documentation necessary to adequately consider the effects of the General Plan. The City of Greenfield, as lead agency, has approval authority and responsibility for considering the environmental effects of the whole of the project.

S.II Summary of Environmental Impacts

The Environmental Evaluation identified a number of impacts associated with the project. In most cases, significant impacts could be reduced to a less than significant level through proposed mitigation. However, the evaluation identified three significant and unavoidable impacts. These impacts are due to the alternation of scenic resources, the loss of important farmlands and air emissions. Significant and Unavoidable Impacts are summarized in Subsection S.V. All other project impacts and proposed mitigation measures that would reduce, minimize or avoid potential impacts are summarized below. For detailed discussions of all project impacts and mitigation measures, the please refer to topical environmental analysis contained in this chapter.

AESTHETIC RESOURCES

Impacts

Impact 1.2 Implementation of the proposed General Plan could result in the introduction of a substantial amount of daytime glare sources to the area.

Impact 1.3 Implementation of the proposed General Plan would increase the amount of nighttime lighting in developed portions of the City and create new sources in undeveloped areas. These increased nighttime lighting levels could have an adverse affect on adjacent areas and land uses.

Mitigation

Implementation of **Land Use Policy 2.8.8** and **Program 2.8.D**, will require buildings to minimize the use of reflective materials to minimize daytime and nighttime glare.

Agricultural Resources

Impacts

Impact 2.2 Implementation of the proposed General Plan will result in the placement of new urban uses adjacent to agricultural uses. This is considered a potentially significant impact.

Mitigation

Impacts may be reduced through a number of methods including adjacent land use designation, use of agricultural buffers and types of agriculture. These measures have been translated into a series of goals, policies and programs as contained within the **Land Use Element** and **Conservation, Recreation and Open Space Element**).

Air Quality

Impacts

Impact 3.2 Implementation of the proposed General Plan would increase air pollutant emissions from operational activities of land uses within the City along street segments and intersections that may affect sensitive receptors.

Impact 3.3 Implementation of the General Plan would include sources of criteria pollutants, toxic air contaminants or odors that may affect surrounding land uses. Sensitive land uses may also be located near existing sources of criteria pollutants, toxic air contaminants or odors.

Impact 3.4 Construction activities and certain types of land uses, (such as heavy industrial, commercial, and agricultural uses as proposed in the General Plan), may create objectionable odors.

Mitigation

These impacts are considered to be less than significant therefore no mitigation is required.

Biological Resources

Impacts

Impact 4.1 Implementation and buildout of proposed General Plan could impact populations, individuals, or habitat for special-status plant species.

Impact 4.2 Trees and plants identified by the California Native Plant Society as sensitive may be impacted as a result of future site-specific project development.

Impact 4.3 Implementation of the proposed General Plan could result in direct and indirect impacts on special-status wildlife species and their associated habitats.

Impact 4.4 Implementation of the proposed General Plan could result in the loss of sensitive habitat areas in the City.

Mitigation

Implementation of policies and programs in the General Plan (specifically **Program 7.5.A Policy 7.5.1 Policy 7.5.2 Policy 7.5.3 Policy 7.5.4** contained in the **Conservation, Recreation and Open Space Element**) would ensure that individual projects are required to analyze and mitigate for site-specific biological resources pursuant to current state and federal protocols for protected species.

Cultural and Historic Resources

Impacts

Impact 5.1 Implementation of the proposed General Plan could result in the disturbance of known and undiscovered prehistoric and historic resources in the City.

Mitigation

Through a combination of “cease and desist” requirements (for archaeology and paleontology) and requiring historic assessments of potentially historic structures as part of the project

review process and consistent with existing regulations and implementation of the General Plan policies and programs contained under **Goals 7.6 and 7.7** would effectively mitigate potential cultural and historic resource impacts.

Geology and Geologic Constraints

Impacts

Impact 6.1 Future development within the Planning Area could expose people or property to severe seismic ground shaking. This is a potentially significant impact.

Impact 6.2 The seismic hazards of the region give rise to the risk of liquefaction, ground settlement and ground failure.

Impact 6.3 Land clearing, grading, cut and fill operations, and any other site preparation activities and installation of impervious surfaces such as roads and building pads will increase the risk of soil erosion and loss of topsoil from water and wind.

Impact 6.4 Implementation of the proposed General Plan could expose buildings, pavements, and utilities to significant damage as a result of underlying expansive or unstable soil properties.

Mitigation

Goal 8.1 and its implementing policies and programs (as identified in the **Health and Safety Element**) require future development to comply with all codes and development standards addressing seismic safety, including preparation of site specific geotechnical reports and implementation of the recommendations in those reports.

Erosion resulting from the project can be successfully controlled and prevented using a variety of methods including implementation of all policies and programs of **Goal 4.10.1**, Drainage Facilities. These policies and programs require that drainage and erosion control plans be submitted for all future development proposals and shall be reviewed by the City building inspection and engineering staff.

The General Plan will reduce the potential impacts of adverse soil conditions by ensuring compliance with all State-mandated building standards, codes and engineering recommendations.

Site Hazards and Hazardous Materials

Impacts

Impact 7.1 Implementation of the proposed General Plan may result in the discovery of known and unknown hazardous material contamination in areas proposed for development under the General Plan. This is considered a potentially significant impact.

Impact 7.2 Implementation of the proposed General Plan could result in safety hazards associated with airport operations near areas proposed for development.

Mitigation

Chapter 8.0 of the General Plan, the **Health and Safety Element**, contains specific goals, policies and programs to address the identification and treatment of hazardous materials within the Greenfield Planning Area. Specifically, the implementing policies of **Goal 8.4** require compliance with all existing federal, state and local regulations regarding the use,

transport and remediation of such materials, as well as requirements for the evaluation and testing of sites that may contain such materials.

Hydrology and Water Quality

Impacts

Impact 8.1 Development within the Greenfield Planning Area may result in violation of water quality standards associated with individual development projects over time.

Impact 8.2 Development resulting from General Plan buildout would alter existing drainage patterns, increase areas of impervious surfaces, and surface water runoff thus contributing to localized drainage, flooding and erosion problems within the City.

Impact 8.3 The General Plan Planning Area and SOI are not within the recognized 100-year flood plain.

Mitigation

Goals 4.10 and 8.2 address drainage facilities and flood protection in Greenfield. Consistent with the policies and programs that implement these goals, drainage and erosion control plans must be reviewed and approved by the Public Works Director and City Engineer as part of the Tentative Map process. Best Management Practices must be identified to demonstrate control of erosion and water quality impacts during construction. Stormwater Pollution Prevention Plans are required for larger projects and all projects must demonstrate compliance with standards and regulations as required by the State Water Resources Control Board.

Land Use Planning

Impacts

Impact 9.1 The Greenfield General Plan introduces new and expanded urban land uses (together with goals, policies and programs to implement those land uses) in an area consisting primarily of low-density, rural and agricultural land uses.

Mitigation

These impacts are considered to be less than significant therefore no mitigation is required.

Noise

Impacts

Impact 10.1 Buildout of future land uses within the Planning Area and development of individual projects (large and small) will result in temporary noise impacts due to construction.

Impact 10.2 Increases in traffic generation as a result of General Plan implementation will result in elevated noise levels along local roadways and Highway 101

Impact 10.3 Buildout of the General Plan could result in noise impacts between incompatible land uses.

Mitigation

The goals, policies and programs of the **General Plan Noise Element (General Plan Chapter 9.0)** addresses construction-related noise through enforcement of the City's noise ordinance. The Ordinance specifies limitations on construction hours and other measures to reduce such noise to acceptable levels.

In addition, the Noise Element provides detailed information regarding noise compatibility, acceptable noise thresholds for interior and exterior urban areas, and guidelines regarding the submittal of acoustic analyses for future projects. The goals, policies, and programs within the Noise Element provide sufficient analysis thresholds and recommendations for attenuation, which emphasize site planning and design, rather than walls and barriers, as the preferred method for mitigation.

Population and Housing

Impacts

Impact 11.1 Implementation of the Greenfield General Plan will directly induce substantial population growth in the area in and around the existing City of Greenfield.

Mitigation

Traffic, air quality, noise and increased demand upon public services are the primary population-based environmental effects resulting from substantial increases in population growth. As discussed in **Chapters 3.0, 4.0, 8.0 and 9.0**, respectively, the General Plan provides a series of applicable policies and programs to address these population-based effects. Through logical planning (as demonstrated in the **Land Use Element**) and the implementation of ordinances, regulations, fees, system upgrades, and conservation measures described in those chapters, physical environmental effects from increased population can be effectively addressed.

Public Services and Facilities

Impacts

Impact 12.1 Implementation of the City's General Plan will result in a substantial increase in demand for potable water supplies.

Impact 12.2 Implementation of the City's General Plan will result in the need to expand water pumping, treatment, storage, and distribution facilities.

Impact 12.3 Implementation of the General Plan will result in increased demands upon the wastewater collection, treatment and disposal facilities.

Impact 12.4 Implementation of the General Plan will result in an increased demand for police and fire protection services and related physical infrastructure.

Impact 12.5 Implementation of the General Plan will result in the need for expanded electric, natural gas, cable and telephone service beyond the service capacity of existing systems.

Impact 12.6 Implementation of the General Plan will result in additional students at levels that could strain the capacity of existing school facilities.

Impact 12.7 Implementation of the General Plan would increase demand for solid waste services and generate additional volumes of solid waste for disposal.

Impact 12.8 Implementation of the General Plan will increase demand for park and recreation facilities to serve new and existing residents of Greenfield.

Mitigation

Any public facility project such as the construction of new water system infrastructure will be considered a project under CEQA, or will be constructed as part of a larger project or projects that implement the General Plan. As such, any specific proposal will undergo individual environmental review. In addition, the policies and programs of the **General Plan Chapter 4.0 (Growth Management)** encourage conservation measures to limit the need for additional infrastructure, as well as policies to place new infrastructure in existing roads and rights-of-way to minimize environmental disturbance.

Goal 4.9 and its implementing policies and programs in **Chapter 4.0** of the General Plan require coordination of development activity with monitoring capacity within the wastewater system. The policies and programs require developer financing of improvements and assurance of capacity prior to development to ensure that development does not outpace capacity. Policies are also provided to encourage use of reclaimed water in order to delay the need for future expansions of the treatment plant. These measures, together with currently permitted capacity and capacity improvements that are underway, will reduce potential impacts.

Goals 4.4 and 4.5 of the General Plan address police and fire service levels. The policies and programs outline a number of methods by which these service providers will continue to maintain acceptable service levels. As with other public services, policies call for fair share financing through new development to offset the cost of additional service needs. Implementation of the General Plan's policies and programs will maintain performance standards for police and fire facilities.

The **General Plan Chapter 4.0, Growth Management Element**, contains a series of goals, policies and programs to address future school facilities and new student generation. Implementation of these policies and programs and coordination with the districts throughout the planning and development process will mitigate facility impacts as much as possible.

Chapter 7.0 of the General Plan, the Conservation, Recreation and Open Space Element, addresses park and recreation facilities. Policies under **Goal 7.2** specify park performance standards and guidelines for park location. The detailed policies and programs of the General Plan provide a coordinated approach to planning, financing and constructing adequate park facilities.

Traffic and Circulation

Impacts

Impact 13.1 Buildout of the General Plan will require significant improvements to the roadway network to maintain acceptable levels of service.

Impact 13.2 Implementation of the General Plan will affect citywide parking, create the need for pedestrian and bicycle facilities, and increase demands upon transit systems.

Mitigation

Chapter 3.0 of the General Plan, the Circulation Element, provides extensive policies that address acceptable service standards for circulation as the City transitions from a rural community to a more compact urban center. The policies and programs call for design standards that reflect the more compact urban land use pattern anticipated by the General Plan, as well as clear bicycle and pedestrian linkages between land uses to encourage non-motorized transportation. The Circulation Element specifically calls for new roadways to accommodate public transit features, and addresses public safety in and around high-volume areas such as schools.

S.III Project Alternatives Considered

Two land use alternatives to the proposed general plan have been evaluated in the environmental review. These alternatives included a “No Project Alternative” and a “Lower Intensity Alternative.”

Based on the alternatives analysis contained within the *Alternatives Analysis* section of this chapter, the environmental review concludes that the Lower Intensity Alternative would be the “environmentally superior alternative.” CEQA requires the identification of such an alternative as a component of the alternatives analysis.

Both the Lower Density Alternative and the Proposed Project would require the unavoidable conversion of agricultural land. See the *Alternatives Section* of the Environmental Review chapter for a more detailed discussion of the project alternatives.

S.IV Summary of Cumulative Impacts

The Greenfield General Plan is discussed in the context of its cumulative effect when considered with the closely related General Plans of neighboring communities. Specifically, this analysis includes a qualitative discussion of anticipated environmental effects of the combined planning efforts of the City of Gonzales, City of Soledad and City of King.

Cumulatively significant impacts were identified in the areas of Air Quality, Biological Resources, Public Services and Facilities, and Traffic and Circulation. Of these impacts, the cumulative conversion of farmland, the regional impacts to air quality, and the irreversible loss of cumulative habitat were identified as **cumulatively significant and unavoidable** in the Environmental Review of the project. No feasible mitigation is available to reduce these impacts to a less than significant level. See the *Cumulative Impacts* section of this chapter for a detailed discussion of cumulative impacts.

S.V Summary of Significant and Unavoidable Impacts

Three impacts were found to be **significant and unavoidable** in the Environmental Review of the project. In addition, *cumulatively* the project will result in three significant and unavoidable impacts as discussed above. No feasible mitigation is available to reduce these impacts to a less than significant level. The impacts are summarized below:

AESTHETICS

Impact 1.1 Implementation of the proposed General Plan would result in the alteration of existing scenic resources.

The Conservation, Recreation and Open Space Element (**Policies 7.8.1, 7.8.2, 7.9.1 and 7.9.2** and related Programs) as well as Land Use **Policies 2.1.1, 2.1.7, 2.5.6** and related programs, address visual resources and urban design. These measures encourage the protection of scenic vistas, complementary and compact development design and require development review to ensure visual impacts are minimized.

Despite these policies and regulations, however, the amount of change, pace of change, overall character and appearance will be significantly altered with the implementation of the proposed General Plan over the next 20 years.

AGRICULTURAL RESOURCES

Impact 2.1 Implementation of the proposed General Plan would result in the loss of important farmlands (Prime Farmland, Unique Farmland, and Farmland of Statewide Importance) as designated under the Farmland Mapping and Monitoring Program as well as lands under active Williamson Act contracts.

No feasible mitigation measures are available to reduce the loss of important farmland due to the implementation of the proposed General Plan. Although the City has incorporated a series of planning measures into the General Plan itself that recognize agriculture as an important resource, this impact is considered a **significant and unavoidable** consequence of the project.

AIR QUALITY

Impact 3.1 Implementation of the proposed General Plan Update would result in exhaust emissions and fugitive dust from construction activities, as well as a long-term operational increase in air pollutant emissions from operational activities of land uses within the City. These emissions would affect the ambient air quality and exacerbate existing air quality conditions in the North Central Coast Air Basin.

Implementation of **General Plan Program 8.5B** would assist in reducing potential construction air quality impacts and the emission of fine particulate matter over the next twenty years.

Policy 8.5C would require the City to work with the MBUAPCD and AMBAG and to the extent feasible, to meet Federal and State air quality standards for all pollutants. This policy would also require the City participate in future amendments and updates of the MBUAPCD, to ensure that new measures can be practically enforced in the region. However, due to the projected population growth regional emissions would remain significant and the General Plan would likely remain inconsistent with the *MBUAPCD Air Quality Management Plan*.

S.VI Areas of Controversy

As identified in the EIR chapter, primary areas of controversy associated with the Greenfield General Plan may include the following:

- Quantity and conversion of prime and important farmland;
- Population growth and provision of public services; and
- Effects upon regional transportation.

Although the EIR has addressed each of these issues, continued discussion is anticipated.

INTRODUCTION

This chapter of the General Plan comprises the Environmental Review of the project and, combined with several other elements of the General Plan, serves as the Draft Environmental Impact Report (DEIR). Pursuant to the CEQA Guidelines Section 15166, the EIR is included as part of the General Plan and no separate EIR is required. The purpose of this section is to evaluate the potential environmental effects associated with implementation of the General Plan.

I. Background and Purpose

The City of Greenfield has prepared this EIR to provide the public, responsible agencies and trustee agencies with information about the potential environmental effects of the proposed General Plan update (project). As described in CEQA Guidelines Section 15121(a), an EIR is a public information document that assesses potential environmental effects of the proposed project and identifies mitigation measures and alternatives to the proposed project that could reduce or avoid adverse environmental impacts. Public agencies are charged with the duty to consider and minimize environmental impacts of proposed development where feasible, and have an obligation to balance a variety of public objectives, including environmental, economic and social factors.

CEQA requires the preparation of an EIR prior to approval of any “project” that may have a significant effect on the environment. For the purposes of CEQA, the term “project” refers to the whole of an action, which has the potential to result in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]).

II. Intended Uses of this EIR

This EIR provides an environmental evaluation, at a programmatic level, to predict the environmental consequences resulting from implementation of the General Plan. This document will be used by the City and other responsible agencies as a first-tier analysis when considering the environmental effects of subsequent projects within the City’s Planning Area. This first-tier document will be used as much as possible to evaluate the impacts of subsequent projects, and provides the baseline environmental information needed by responsible agencies acting on permits relative to the projects within the Planning Area. The Project Description for the General Plan is found in Chapter 2.0, Land Use Element.

III. Scope and Organization

Sections 15122 through 15132 of the CEQA Guidelines identify the content requirements for Draft and Final EIRs. An EIR must include:

- A description of the environmental setting,
- An environmental impact analysis,
- Mitigation measures,
- Alternatives,
- Cumulative impacts,
- Significant irreversible environmental changes, and
- Growth-inducing impacts.

The environmental issues addressed in the DEIR were established through the preparation of environmental documentation and supporting technical reports developed for the project. Based upon documentation, technical reports, NOP responses, agency consultation and review of the project, the City has determined the scope for this EIR.

This document is a “program EIR” as defined by CEQA Guidelines section 15168. As a programmatic EIR, the document has been prepared to contemplate a series of future actions (implementation and development of land within the City’s planning area). These actions are related: 1) geographically; and 2) in connection with the goals, policies and regulations that will continue with the General Plan.

This Draft EIR is organized in the following manner:

PROJECT DESCRIPTION

The Introduction of the General Plan (Chapter 1) provides an overview of the General Plan Community Goals and Vision, a summary of projected growth and subsequent actions to follow General Plan adoption. Chapter 2.0, the Land Use Element, provides details regarding city-wide planning boundaries, land uses, densities, projected growth and land use goals and policies. Chapters 1.0 and 2.0 provide all information necessary to serve as the Project Description for the EIR.

ENVIRONMENTAL SETTING

Each element of the General Plan contains a review of the existing conditions and current setting in the City of Greenfield. The technical reports prepared for the General Plan Update (General Plan Appendices) provide additional information. The location of setting information is summarized in the following table:

Table 10-1
Location of Setting Information

EIR Section	Setting Information
Aesthetics	<ul style="list-style-type: none"> ▪ Land Use Element ▪ Open Space Element
Agricultural Resources	<ul style="list-style-type: none"> ▪ Conservation, Recreation and Open Space
Air Quality	<ul style="list-style-type: none"> ▪ Health & Safety Element ▪ Air Quality Technical Study
Biological Resources	<ul style="list-style-type: none"> ▪ Conservation, Recreation and Open Space
Cultural and Historic Resources	<ul style="list-style-type: none"> ▪ Conservation, Recreation and Open Space ▪ Cultural Resources Technical Study
Geology and Geologic Constraints	<ul style="list-style-type: none"> ▪ Health & Safety Element
Site Hazards and Hazardous Materials	<ul style="list-style-type: none"> ▪ Health & Safety Element
Hydrology and Water Quality	<ul style="list-style-type: none"> ▪ Growth Management Element
Land Use Planning	<ul style="list-style-type: none"> ▪ Land Use Element
Noise	<ul style="list-style-type: none"> ▪ Health & Safety Element ▪ Noise Technical Study
Population and Housing	<ul style="list-style-type: none"> ▪ Housing Element
Public Services and Facilities	<ul style="list-style-type: none"> ▪ Growth Management Element ▪ Conservation, Recreation and Open Space
Traffic and Circulation	<ul style="list-style-type: none"> ▪ Circulation Element ▪ Traffic Technical Study

IMPACTS AND MITIGATION MEASURES

This section includes a summary of the regulatory environment, the potential environmental impacts of the project, and mitigation measures for the environmental impacts. Wherever possible, this EIR references specific General Plan policies and implementation programs that will serve to mitigate the impacts of General Plan buildout. The General Plan was prepared with environmental factors in mind, and is intended to be “self mitigating” to the extent possible.

The following major environmental topics are addressed in this section:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural and Historic Resources
- Geology and Geologic Constraints
- Site Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use Planning

- Noise
- Population and Housing
- Public Services and Facilities
- Traffic and Circulation

ALTERNATIVES TO THE PROJECT

CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to the project, which could feasibly attain the basic objectives of the project and avoid and/or lessen the environmental effects of the project. A comparative analysis of these alternatives is contained within this chapter. The determinations of the City of Greenfield concerning the feasibility, acceptance, or rejection of each and all alternatives considered in this EIR will be addressed in the City's findings, as required by CEQA.

CUMULATIVE IMPACT ANALYSIS

This section evaluates the potentially significant cumulative impacts generated by buildout of the general plan and regional growth.

OTHER SECTIONS REQUIRED BY CEQA

This section contains required discussions and analyses of various topical issues mandated by CEQA Guidelines Section 15126.2, including: significant and unavoidable environmental effects, irreversible environmental changes and effects found not to be significant.

REPORT PREPARERS AND REFERENCES

The purpose of this section is to provide a list of all authors and agencies that assisted in the preparation of the report by name, title, and company or agency affiliation. It also itemizes supporting and reference data used in the preparation of the Draft EIR and lists all governmental agencies, organizations and other individuals consulted in preparing the Draft EIR.

APPENDICES

The General Plan Update EIR technical appendices are bound as a separate volume and include all notices and other procedural documents pertinent to the EIR, as well as all technical reports prepared in support of the analysis.

IV. Impact Terminology

This Draft EIR uses the following terminology to describe environmental effects of the proposed project:

- **Standards of Significance:** A set of criteria used by the lead agency to determine at what level, or “threshold”, an impact would be considered significant. Significance criteria used in this EIR include the CEQA Guidelines and Statutes; factual or scientific information; regulatory performance standards of local, state, and federal agencies; and the Goals, Objectives, and Policies of the City of Greenfield General Plan.
- **Less than Significant Impact:** A less than significant impact would cause no substantial change in the environment and no mitigation is required.
- **Significant (Potentially Significant) Impact:¹** A significant or potentially significant impact may cause a substantial adverse change in the physical conditions of the environment. Significant impacts are identified by the evaluation of project effects using specified standards of significance. Mitigation measures and/or project alternatives are identified to reduce project effects to the environment.
- **Significant (Potentially Significant) Unavoidable Impact:** A significant (or potentially significant) unavoidable impact would result in a substantial change in the environment for which no feasible mitigation is available to reduce the impact to a less than significant level, although mitigation may be available to lessen the degree of the impact.
- **Cumulative Impact:** Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

¹ A "potentially significant impact" occurs when there is a possible impact that cannot be identified at this time (i.e., presence of cultural resources).

IMPACTS AND MITIGATION

1. AESTHETICS

REGULATORY SETTING

Local Regulations

Existing Monterey County General Plan

The existing (1982) Monterey County General Plan contains goals and policies relevant to this discussion, including policies to reduce impacts to scenic vistas and scenic roads and highways.

The Central Salinas Valley Area Plan (part of the Monterey County General Plan) identifies visually sensitive topography east and west of the City of Greenfield; however, there are no visually sensitive resources in the City's Planning Area.

California Scenic Highway Program

The California Scenic Highway Program was created by the State Legislature in 1963. Its purpose is to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to highways. The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been so designated. There are no designated or nominated scenic highway corridors in the Greenfield Planning Area.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

An aesthetic or visual resource impact is considered significant if implementation of the project would result in any of the following:

1. Have a substantial adverse affect on a scenic vista;
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
3. Substantially degrade the existing visual character or quality of the site and its surroundings or introduce a feature that is out of character that dominates the view;
4. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Analysis Methodology

The visual resource analysis is based on field review of the Planning Area, review of topographic conditions, and review of the proposed land use map options. In addition, staff performed a visual field study from several vantage points within the City and public view areas in the Planning Area.

10.0 – ENVIRONMENTAL REVIEW

This analysis is based on anticipated changes within the Planning Area from ongoing development activity and construction of related improvements.

Project Impacts and Mitigation Measures

Alteration of Scenic Vistas, Resources and Visual Character

Impact 1.1 Implementation of the proposed General Plan would result in the alteration of existing scenic resources. This is considered a **significant impact**.

According to the California Department of Transportation and the California Scenic Highway System, there are no designated scenic highways in the Planning Area. The County identifies Road G16 (connecting Greenfield to the coast) as a local scenic route. However, the area of development within the Planning Area will not affect this road or compromise its visual resources.

The implementation of the proposed City of Greenfield General Plan would result in alterations to the existing landscape characteristics of the City and changes in visual character. Areas of agricultural land and rural residential uses currently on the fringe of the city are still relatively close to the downtown and existing neighborhoods. This is one of the characteristics of Greenfield that give the city its identity as an agricultural community. With implementation of the General Plan, a significant change from agricultural land to urban land uses in the entire Planning Area will occur. This change will be most noticeable east of Highway 101, north of Walnut Avenue and south of Elm Avenue. Most of this land area is currently in active agriculture and, over time, will be developed with regional commercial, industrial and residential uses.

As part of the General Plan development, the City has been sensitive to this change and has addressed the city's future physical appearance through a number of policies and implementation measures. In addition, the introduction of the AAVS land use at the north end of the city will be effective toward softening the transition between agriculture and new urban land uses.

Mitigation: The Conservation, Recreation and Open Space Element (Policies 7.8.1, 7.8.2, 7.9.1 and 7.9.2 and related Programs) as well as Land Use Policies 2.1.1, 2.1.7, 2.5.6 and related programs, address visual resources and urban design. These measures encourage the protection of scenic vistas, and require development review to ensure visual impacts are minimized. Development is encouraged that will complement, not overwhelm, the existing scale and intensity of development in the City. Development is also designed to be compact, preserving larger areas of agricultural land and open space in the long term and avoiding unchecked sprawl.

Despite these policies and regulations, however, the amount of change, pace of change, overall character and appearance will be significantly altered with the implementation of the proposed General Plan over the next 20 years. Although this analysis is somewhat subjective (as it may also be argued that new development of quality design may result in many visual improvements to the community), the impact to the city's overall visual and rural character is nonetheless considered to be **significant and unavoidable** in the long term.

Daytime Glare

Impact 1.2 Implementation of the proposed General Plan could result in the introduction of a substantial amount of daytime glare sources to the area. This is considered a **potentially significant impact**.

The main sources of daytime glare are generally sunlight reflecting from structures and other reflective surfaces and windows. Implementation of the proposed City of Greenfield General Plan would introduce new sources of daytime glare into the City and increase the amount of daytime glare in existing developed areas. The proposed land uses consist of various densities of commercial, office, recreation and other public uses. Daytime glare impacts would not be substantial in developed areas due to the large amount of recent growth and construction activities. Daytime glare would result in greater adverse impacts on any undeveloped portions of the City and Planning Area.

Mitigation: Implementation of Land Use Policy 2.8.8 and Program 2.8.D, which require buildings to minimize the use of reflective materials to minimize daytime glare, will reduce this impact to a **less than significant** level.

Nighttime Lighting

Impact 1.3 Implementation of the proposed General Plan would increase the amount of nighttime lighting in developed portions of the City and create new sources in undeveloped areas. These increased nighttime lighting levels could have an adverse affect on adjacent areas and land uses. This is considered a **potentially significant** impact.

Planned development and growth proposed in the General Plan would introduce new light sources into undeveloped portions of the City. Nighttime lighting levels would increase substantially over current levels in undeveloped portions of the City and incrementally with future projects in developed areas. New light sources would include, but not be limited to, new residential developments, street lighting, parking lot lights, and security related lighting for non-residential uses. These new light sources could result in adverse affects to adjacent land uses through the “spilling over” of light into these areas and “sky glow” conditions. In addition, implementation of the proposed General Plan would result in intensified nighttime lighting levels associated with increased traffic levels and further residential and commercial development.

Mitigation: Implementation of Land Use Policy 2.8.8 and Program 2.8.D will reduce nighttime lighting impacts to a **less than significant** level.

2. AGRICULTURAL RESOURCES

REGULATORY SETTING

State Regulations

Williamson Act

The California Land Conservation Act, also known as the Williamson Act, was adopted in 1965 to encourage the preservation of the state’s agricultural lands and prevent their premature conversion to urban uses. In order to preserve these uses, the Act established an agricultural preserve contract procedure by which any county or city within the state taxes landowners at a lower rate, using a scale based on the actual use of the land for agricultural purposes, as opposed to its unrestricted market value. In return, the owners guarantee that these properties will remain under agricultural production for a ten-year period. The contract is renewed automatically on an annual basis unless the owner files a notice of non-renewal. In this manner, each agricultural preserve contract (at any

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given date) is always operable at least nine years into the future. Currently, approximately 70 percent of the state's prime agricultural land is protected under this Act. Prime farmland under the Williamson Act includes land that qualifies as Class I and II in the NRCS classification or land that qualifies for rating 80 to 100 in the Storie Index Rating.

Figure 7-3 of the General Plan illustrates the location of properties within the City of Greenfield Planning Area which currently are or have recently been under Williamson Act contracts. There are approximately 119 acres of Williamson Act land within the Planning Area, although there are no active contracts within the existing City limits.

Local Regulations

City of Greenfield Right to Farm Ordinance

The City of Greenfield does not currently have an adopted City-wide right to farm ordinance. Individual projects near active agricultural lands, however, have contained deed notices informing new residences of the presence and potential nuisances associated with nearby farming operations.

Monterey County Right-to-Farm Ordinance

The Monterey County Board of Supervisors passed the Right-to-Farm Ordinance on July 10, 1990. This ordinance was established to ensure that agricultural operations performed in a manner consistent with proper and accepted customs and standards be allowed to continue. It is also designed to allow accepted farming activities to occur twenty-four hours a day without complaints from nearby residents. Those residents that choose to reside adjacent to these uses shall be prepared to accept such inconveniences when they occur. If there is an agricultural production that does not appear to be consistent with accepted practices, then any person may file a complaint with the Agricultural Commissioner.

Monterey County General Plan

The Monterey County General Plan is considered the "blueprint" to guide future development in unincorporated portions of the County, including sections of the Planning Area that are currently outside the Greenfield city limits. Existing County policy supports contiguous urban growth, preservation of agricultural land, and protection of prime farmland adjacent to Salinas Valley cities.

LAFCO of Monterey County

The Cortese-Knox Act, LAFCO's enabling statute, requires that LAFCOs "consider the effect of maintaining the physical and economic integrity of designated agricultural preserves when determining an agency's Sphere of Influence or reviewing proposals". Although there are no designated agricultural preserves in the vicinity of Greenfield, the Government Code establishes two policies to be used by LAFCOs in reviewing, approving or disapproving proposals with respect to agricultural and open space lands:

- First, that development shall be guided away from existing prime farmland toward areas containing non-prime farmlands, unless such action would not promote the planned, orderly, efficient development of an area; and

- Second, that development within an agency's existing jurisdiction or Sphere of Influence should be encouraged before approval of any annexation of additional property that would lead to conversion of existing open space lands to uses other than open space.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

For purposes of this EIR, the following criteria were used in determining whether the implementation of the proposed General Plan would result in a significant impact:

1. Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract.
3. Changes to the existing environment that, due to their location or nature, could result in conversion of farmland to non-agricultural use.

Analysis Methodology

Evaluation of potential agricultural-related impacts of the City of Greenfield General Plan was based on an inventory and review of mapping of local farmland quality, review of the state and local policies, and a field review of the City to assess the existing type and intensity of agriculture surrounding the City. The agricultural analysis is based on information gathered from the City of Greenfield Land Use Element and Conservation, Recreation and Open Space Element, the California Department of Conservation Farmland Conversion Report 1998 – 2000, the California Department of Conservation Important Farmlands Map, the Soil Survey of Monterey County, California, and the Monterey County Agricultural Commissioner's Report (2003).

Project Impacts and Mitigation Measures

Loss of Important Agricultural Land

Impact 2.1 Implementation of the proposed General Plan would result in the loss of important farmlands (Prime Farmland, Unique Farmland, and Farmland of Statewide Importance) as designated under the Farmland Mapping and Monitoring Program as well as lands under active Williamson Act contracts. This is considered a **significant and unavoidable** impact.

Subsequent land use development and associated public improvements (e.g., roadway improvements, infrastructure facilities, parks and public schools) within proposed City limits and Sphere of Influence under the General Plan would result in the conversion of important farmland. According to the California State Department of Conservation Important Farmland Map (2002), there are approximately 1,305 acres of important farmlands within the Planning Area and proposed Sphere of Influence. Nearly all farmland within the Planning Area is considered Prime Farmland (see **Figure 7-3** of the General Plan).

In addition to the loss of important farmlands, implementation of the General Plan would also result in the conversion of farmland areas currently protected under Williamson Act contracts in the

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northeastern portion of the City. Although the majority of this acreage is within Residential Reserve areas or within the AAVS land use (and thus is not anticipated to convert to urban uses in the near future and/or would maintain artisan agriculture use), this land will most likely be removed from Williamson Act status sometime within the 20 year lifespan of the General Plan (see Figure 7-3). The areas of Williamson Act land within the City's Planning Area are smaller "islands" of property. In comparison, large tracts of Williamson Act lands surround the Planning Area in all directions and provide a more formidable long-term constraint to growth.

The City of Greenfield has proposed a land use plan that responds to projected population growth over the next 20 years, but plans for that growth based on a compact land use pattern. All growth areas are contiguous to the existing City limits, and the land use plan attempts to create logical planning boundaries that expand upon the existing land use pattern of the City. As a community surrounded by prime farmland there are few options available in terms of the preferred "direction" of growth based on the quality of farmland. The City has therefore planned a land use scenario that restricts growth beyond Second Street to the east and Thorne Road to the north.

Mitigation: With prime farmland surrounding the existing City of Greenfield, the City recognizes that any growth beyond the existing City limits will result in significant impacts relative to conversion. However, the City has attempted to minimize those impacts through the efficiency of the land use pattern proposed, as well as the Goals, Policies and Programs of the Conservation, Recreation and Open Space Element (Chapter 7) that promote the long-term viability of agricultural within and adjacent to the City. Of the estimated 1,305 acres in the Planning Area subject to future conversion, it should be noted that approximately half of that acreage is either within the less intensive and "ag friendly" AAVS designation, or is subject to the City's Residential Reserve overlay. In addition, this area includes the Yanks Air Museum property (previously approved for development by the County), as well a large industrial area in the southeast corner of the City that may take many years to market and develop.

Based on the analysis provided above, no feasible mitigation measures are available to reduce the loss of important farmland due to the implementation of the proposed General Plan. Although the City has incorporated a series of planning measures into the General Plan itself that recognize agriculture as an important resource, this impact is considered a **significant and unavoidable** consequence of the project.

Agricultural/Urban Interface

Impact 2.2 Implementation of the proposed General Plan will result in the placement of new urban uses adjacent to agricultural uses. This is considered a **potentially significant** impact.

Implementation of the proposed General Plan would result in the placement of urban uses adjacent to agricultural uses, particularly at the boundaries of the City's Planning Area and Sphere of Influence. The General Plan acknowledges that as the City grows and expands into areas historically used for intensive agriculture, urban interface conflicts may occur.

Agriculture/urban interface conflicts vary depending on the type of agricultural use, and generally include, but are not limited to, the following:

- Inconveniences or discomforts associated with dust, smoke, noise, and odor from agricultural operations;

- Restrictions on agricultural operations (such as pesticide application) along interfaces with urban uses;
- Conflicts with farm equipment and vehicles using roadways;
- Trespassing and vandalism on active farmlands; and
- Pressure to convert land to urban uses as a result of above mentioned conflicts and increases in property value.

Mitigation: There are number of ways the City has mitigated and minimized the potential for land use conflicts along the urban/agriculture interface. On the east side, polices have been proposed to require a minimum 200' land use buffer between active agriculture and new residential areas. To the south, much of the southern boundary is designated as industrial, a land use that is less sensitive to neighboring agricultural uses. To the north, the Artisan Agriculture/Visitor Serving (AAVS) land use designation is considered a "transitional", low-density land use that allows agriculture and serves as an agricultural land use buffer to higher intensity urban uses. To the west are mostly vineyards. Although vineyards can also result in compatibility conflicts, they result in only one annual harvest, utilize more manual (compared to mechanical) labor, and provide a perceived aesthetic to a community as compared to intensive row crops. As such, the west side of the City should experience fewer agricultural conflicts by the nature of the crops themselves.

These design measures have been translated into a series of goals, policies and programs as contained within the Land Use Element and Conservation, Recreation and Open Space Element (Chapter 7.0). Implementation of these policies and programs throughout the life the General Plan will mitigate potential interface impacts to a **less than significant** level.

3. Air Quality

REGULATORY FRAMEWORK

Federal Regulations

The Federal Clean Air Act (CAA) of 1970 required the Environmental Protection Agency (EPA) to set up National Ambient Air Quality Standards (NAAQS) for several air pollutants on the basis of human health and welfare criteria. The CAA also set deadlines for the attainment of these standards.

The Clean Air Act requires states to prepare an air quality control plan, also known as a State Implementation Plan (SIP). California's SIP contains the strategies and control measures that California will use to attain NAAQS. The CAA of 1990 requires states containing areas that violate the NAAQS to revise their SIPs for conformity with CAA mandates. If the EPA determines a SIP to be inadequate, it may prepare a Federal Implementation Plan (FIP) to address the non-attainment area and may impose additional controls.

State Regulations

The California Air Resources Board (CARB) is the agency with the responsibility for coordination and oversight of state and local air pollution control programs in California and for implementing the requirements of the California Clean Air Act of 1988 (CCAA).

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The California Clean Air Act (CCAA) requires that all air districts in the state endeavor to achieve and maintain California Ambient Air Quality Standards (CAAQS) for O₃, CO, SO₂, and NO₂ by the earliest date. Plans for attaining CAAQS specifies that districts focus particular attention on reducing the emissions from transportation and area-wide emission sources, and the Act provides districts with new authority to regulate indirect sources. Each district plan is to achieve a five percent annual reduction, averaged over consecutive three-year periods, in district-wide emissions of each non-attainment pollutant.

Regional Regulations

The Monterey Bay Unified Air Pollution Control District (MBUAPCD) is the agency that regulates air quality in the air basin. The MBUAPCD has adopted several plans in an attempt to achieve state and federal air quality standards.

Air Quality Management Plan

As required by the CCAA, the MBUAPCD adopted the *1991 Air Quality Management Plan* (AQMP). The AQMP addressed attainment of the State ambient air quality standard for ozone. In 1994, 1997, 2000 and 2004 the District adopted updates to the AQMP. The *2004 Air Quality Management Plan for the Monterey Bay Region* is the current regional air quality plan. The goal of the Plan is to improve air quality through tighter industry controls, cleaner cars and trucks, cleaner fuels, and increased commute alternatives. Adopted Transportation Control Measures (TCMs) are:

- Improved public transit
- Area wide Transportation Demand Management (TDM) program
- Signal synchronization
- New and improved bicycle facilities
- Alternate fuels
- Park and Ride lots
- Livable and walkable community design
- Selected intelligent transportation systems
- Traffic calming

CEQA Air Quality Guidelines

The *MBUAPCD CEQA Air Quality Guidelines* (July 2004) has established recommended thresholds of significance during construction and operation of a project, to be used to evaluate air quality impacts in environmental documents.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

An air quality impact would be considered significant if it would result in any of the following actions:

1. Conflict with or obstruct implementation of any applicable air quality plan.
2. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
3. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
4. Expose sensitive receptors to substantial pollutant concentrations.
5. Create objectionable odors affecting a substantial number of people.

The MBUAPCD CEQA Air Quality Guidelines (July 2004) has established recommended thresholds of significance during construction and operation of a project. The recommended threshold of significance for construction is PM₁₀ emissions of 82 pounds per day or greater. For operational direct and indirect emissions, the MBUPACD has developed guidelines by which air pollutant emissions from individual projects would be quantified, evaluated, and mitigated. The MBUACPD evaluates project related air pollutant emissions for purposes of significance determinations under CEQA based on the criteria in **Table 3-1**.

**Table 3-1
Threshold of Significance for Criteria Pollutants of Concern
Operational Impacts**

Pollutant	Maximum Threshold (pounds/day)
Volatile Organic Compounds (VOC)	137 lbs/day (direct + indirect)
Nitrogen Oxides (NO _x)	137 lbs/day (direct + indirect)
Particulate Matter (PM ₁₀)	82 lbs/day (direct only)
Carbon Monoxide (CO)	Level of service (LOS) at intersection/road segment degrades from LOS D or better to LOS E or F <u>or</u> the volume to capacity (V/C) ratio at intersections/road segment at LOS E or F increases by 0.05 or more <u>or</u> delay at intersection at LOS E or F increases by ten seconds or more <u>or</u> reserve capacity at unsignalized intersection at LOS E or F decreases by 50 or more.
	550 lbs/day (direct only)
Sulfur Oxides (SO _x)	150 lbs/day (direct only)

1. Projects that emit other criteria pollutant emissions would have a significant impact if emissions would cause or substantially contribute to the violation of State or national AAQS. Criteria pollutant emissions could also have a significant impact if they would alter air movement, moisture, temperature, climate, or create objectionable odors in substantial concentrations. When estimating project emissions, local or project-specific conditions should be considered.
2. District approved dispersion modeling can be used to refine (or validate) a determination of significance if modeling shows that emissions would not cause or substantially contribute to an exceedance of State and national AAQS.

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3. Modeling should be undertaken to determine if the project would cause or substantially contribute (550 lbs/day) to exceedance of CO AAQS. If not, the project would not have a significant impact.

Source: Monterey Bay Unified Air Pollution Control District 2004

Direct emissions refer to pollutants onsite from equipment or stationary engines. These types of sources typically are found at industrial or manufacturing facilities. *MBUAPCD CEQA Guidelines* provide that exceeding the above thresholds for PM₁₀, CO or SO_x is not a significant impact if district-approved air quality modeling indicates that the source would not result in a violation of the corresponding state and federal ambient air quality standards.

Indirect emissions are those related to vehicle traffic attracted or generated by a project. Indirect sources such as the emissions associated with buildout of the General Plan are to be compared to the thresholds for VOC and NO_x. District guidelines additionally identify several traffic-related thresholds related to the potential for high carbon monoxide concentrations. If any of these traffic thresholds are exceeded, carbon monoxide modeling should be undertaken to determine if indirect source emissions would cause an exceedance of state or national standards. If modeling demonstrates that the project would not cause or substantially contribute to an exceedance of CO standards, the project would not have a significant impact.

Exhaust emissions from construction equipment and vehicles emit precursors of ozone (VOC and NO_x) as well as PM₁₀, but emissions from these sources are assumed to be accommodated in the emission inventories of the State- and federally-required air plans and would not have a significant impact on the attainment and maintenance of the ozone standards.

Project Impacts and Mitigation Measures

Violate any air quality standard or contribute substantially to an existing or projected air quality violation and conflict with the Monterey Bay Unified Air Quality Management Plan (AQMP)

Impact 3.1 Implementation of the proposed General Plan Update would result in exhaust emissions and fugitive dust from construction activities, as well as a long-term operational increase in air pollutant emissions from operational activities of land uses within the City. These emissions would affect the ambient air quality and exacerbate existing air quality conditions in the North Central Coast Air Basin. This is considered a **potentially significant impact**.

Construction emissions are generally short-term or temporary in duration; however, still have the potential to significantly impact air quality. The North Central Coast Air Basin is classified as a moderate non-attainment air basin for the more stringent one-hour State ozone standard. The air basin remains on the borderline between attainment and non-attainment in part due to variable meteorological conditions occurring from year to year, transport of air pollution from the San Francisco Bay Area, and locally generated emissions. The photochemical model indicates that while the severity and extent of ozone exceedances are reduced in 2010 in comparison to 1990, some areas of the basin may still not achieve the standard with current control measures. Additional controls may be needed to avoid future exceedances, especially under adverse meteorological conditions (MBUAPCD 2004).

The air basin is also in non-attainment for the State fine particulate matter (PM₁₀) standard. The PM₁₀ violations are more widespread, but occur most frequently at Davenport and Moss Landing.

Construction Related Emissions

The main contributors during construction activities are fugitive dust emissions (PM₁₀) and ozone-forming gases. Fugitive dust emissions are generally associated with grading, movement of soil and other site preparation activities. ROG and NO_x emissions break down to form ozone and are associated primarily with gas and diesel equipment exhaust and the application of various exterior building coatings. The construction of residential dwelling units for the proposed increase to over 36,000 persons in the City of Greenfield, other non-residential uses (commercial, industrial, and office) and the supporting infrastructure would generate emissions of ROG, NO_x, and PM₁₀. Construction activities associated with build-out under the proposed General Plan would include grading, building demolition, building construction, and paving. Wind erosion and disturbance to exposed areas would also be sources of dust emissions. In addition, motor vehicle exhaust associated with construction equipment and construction personnel commuter trips, and material transport and delivery, would contribute to the generation of ROG, NO_x, and PM₁₀. Construction activities associated with infrastructure improvements and non-residential development in City of Greenfield would generate pollutants intermittently; however, individual development projects would account for the majority of development and, consequently, the majority of construction related emissions.

Emissions from individual development construction sites would be short term and temporary but would occur through build-out of the General Plan. At any given times, several construction projects may be under way, which may result in substantial construction related emissions. General Plan Program 8.5B requires that all future development control dust and particulate matter by implementing the Monterey Bay Unified Air Pollution Control District fugitive dust control measures, which include but are not limited to: restricting outdoor storage of fine particulate matter; requiring liners for truck beds and covering of loads; controlling construction activities and emissions from unpaved areas; and paving areas for vehicle maneuvering. These measures would be required for the operation of construction vehicles on major land development and roadway construction projects and would assist in reducing the emission of future dust during construction activities.

Mitigation: Implementation of General Plan Program 8.5B would assist in reducing potential construction air quality impacts and the emission of fine particulate matter over the next twenty years. Implementation of this policy would ensure that construction emissions associated with build-out of the General Plan would be less than significant.

Regional Emissions

Implementation of the proposed General Plan would result in increased vehicle trips, employment growth, and an increase in population. These increases would introduce additional mobile and stationary sources of emissions, which would adversely affect regional air quality. Implementation of the proposed General Plan would result in regional emissions of ROG, NO_x, PM₁₀, and CO due to increased vehicle trips, the use of natural gas, burning activities, the use of maintenance equipment, and the use of various consumer products.

Individual development projects typically have emissions attributed to the project that are evaluated against operational phase emissions presented in Table 3-1, Threshold of Significance for Criteria Pollutants of Concern. General Plans however establish the development for a City over an extended period of time and are used directly in development of the Air Quality Management Plan

(AQMP), which provides the framework by which the region can meet the state ambient air quality standard for ozone. The emission inventory forecasts developed for the AQMP are based on emissions from motor vehicle exhaust; stationary sources such as industrial processes and stationary fuel combustion; and areawide sources such as solvent evaporation from architectural coatings, consumer products, and prescribed burns. The AQMP forecasted emissions inventory assumed a population size based on the AMBAG population projections. Emission sources related to population size include those from motor vehicle usage, energy consumption, consumer products, as well as industrial and commercial activities. The AQMP, through its emission inventory, provides a framework for the region to meet the State Implementation Plan (SIP) goals of meeting state and federal AAQS.

As recommended by the MBUAPCD, the evaluation of whether or not General Plan implementation would lead to significant air quality emissions should be based on whether the population forecasts described in the General Plan are consistent with the population forecasts used in the AQMP. If the population forecasts described in the General Plan are above the population forecasts described in the AQMP, then the General Plan is considered inconsistent with the AQMP and would result in significant cumulative air pollutant emissions. The consistency analysis is performed by the Association of Monterey Bay Area Governments (AMBAG), because AMBAG develops population forecasts that are used in the AQMP.

The AMBAG 2004 Population, Housing Unit, and Employment Forecasts project population growth in five-year increments to the year 2030. The 2025 population forecast for the City of Greenfield by AMBAG is 27,183 people. Since the General Plan enables population growth in excess of the amount forecasted for the City of Greenfield in the year 2025, the General Plan would be inconsistent with the AQMP. This inconsistency in population forecasts is considered to result in a significant air quality impact.

Mitigation: Policy 8.5C would require the City to work with the MBUAPCD and AMBAG and to the extent feasible, to meet Federal and State air quality standards for all pollutants. This policy would also require the City participate in future amendments and updates of the MBUAPCD, to ensure that new measures can be practically enforced in the region. However, due to the projected population growth regional emissions would remain significant and the General Plan would likely remain inconsistent with the *MBUAPCD Air Quality Management Plan*. Therefore this impact would remain **significant and unavoidable**.

Expose Sensitive Receptors to Substantial Pollutant Concentrations

Impact 3.2 Implementation of the proposed General Plan would increase air pollutant emissions from operational activities of land uses within the City along street segments and intersections that may affect sensitive receptors. This is considered a **less than significant** impact.

Identifying local-scale emissions involves assessing pollutant concentrations in proximity to projects where sensitive receptors may be located. As per MBUAPCD *CEQA Air Quality Guidelines*, potential local-scale impacts to sensitive receptors can be determined by either computer modeling of pollutant sources or by identifying those intersections or roadway segments that experience a deterioration of level of service. Auto traffic generated by land use development and cumulative development would affect local air quality along the local and regional street system. On the local

scale the pollutant of greatest concern is CO. Concentrations of this pollutant are related to the levels of traffic and congestion along street segments and at intersections.

The existing roadway network in the City of Greenfield would not support the range and intensity of land uses proposed by the General Plan Update. Based on the trip generation from new land uses as analyzed by Higgins Associates, the roadway network under General Plan buildout conditions will require improvements to a number of existing roadways, as well as major improvements such as a new north/south arterial, improved Highway 101 interchanges (including the Thorne Road interchange), a new bridge over Highway 101 at Pine Street and the widening of Walnut Avenue.

The Circulation Element of the General Plan analyzes impacts to all affected intersections and roadway segments, and specifies the needed improvements (widening, new construction, or signalization) to mitigate the impact. According to the *Traffic Impact Analysis* prepared by Higgins Associates, all of the affected intersections can be mitigated to LOS D, which would ensure that the General Plan would have a less than significant impact on future CO levels at these intersections. In addition General Plan policies 8.5.1 through 8.5.4 would reduce potential operational air quality impacts. Therefore, long-term emissions of carbon monoxide emissions would be considered **less than significant**.

Impact 3.3 Implementation of the General Plan would include sources of criteria pollutants, toxic air contaminants or odors that may affect surrounding land uses. Sensitive land uses may also be located near existing sources of criteria pollutants, toxic air contaminants or odors. This impact is considered a **less than significant** impact.

Implementation of the proposed General Plan would include land uses that are potential sources of Toxic Air Contaminants (TACs). These land uses include, but are not limited to, commercial, professional office, industrial park, light industrial, and heavy industrial uses. The type and level of TACs are dependent on the nature of the land use, individual facilities, and the methods and operations of particular facilities. Potential TAC emissions for various land uses that may be proposed with implementation of the General Plan include: benzene, toluene, xylene, asbestos, ethylene, dichloride, perchloroethylene, etc. Diesel exhaust particulate was added to the California Air Resources Board (CARB) list of TACs in 1998. Activities involving long-term use of diesel-powered equipment at these facilities and operation of heavy-duty trucks contribute significantly to TAC levels.

Direct emissions are released from stationary sources, usually industrial in nature. Because of the great variation in emissions types and amounts from different industrial uses, it is not possible to predict direct emissions. The MBUAPCD has statutory authority over stationary sources of emissions. The MBUAPCD issues permits to ensure that all equipment and processes comply with federal and state laws and regulations, and MBUACD rules. Before a stationary source is built, erected or operated, a permit to do so must be obtained from the MBUAPCD. Air Quality permits are, in effect, a contract between the MBUAPCD and stationary sources that sets limits on emissions and requires compliance with all MBUAPCD, state and federal regulations in order to protect public health. The MBUAPCD's rules and regulations impose limits on emissions. These regulations include the identification and quantification of emissions of Toxic Air Contaminants and, if warranted, estimation of cancer and non-cancer risk associated with any source.

General Plan Policy 8.5.4 would ensure the location and design of development projects so as to conserve air quality and minimize direct and indirect emissions of air contaminants. In addition, the issuance of MBUAPCD Air Quality permits, compliance with all MBUAPCD, state and federal regulations regarding stationary and TACs, and the use of Best Available Control Technology (BACT) would reduce potential stationary and mobile sources toxic air emissions. Therefore, the General Plan's potential TAC impacts are considered **less than significant**.

Create Objectionable Odors Affecting a Substantial Number of People

Impact 3.4 Construction activities and certain types of land uses, (such as heavy industrial, commercial, and agricultural uses as proposed in the General Plan), may create objectionable odors. This is considered a **less than significant** impact.

Construction activities and certain types of land uses, such as heavy industrial, commercial, and agricultural uses may create objectionable odors. MBUAPCD District Rule 402 prohibits any mobile or stationary source to generate an objectionable odor, with the exception of odors emanating from agricultural operations necessary for the growing of crops or raising of fowl or animals. Currently, the MBUAPCD receives approximately 400 air pollution complaints every year from the public. Once reported, an MBUAPCD inspector determines whether or not the source is in violation of a district rule or "permit to operate" condition. If the source is found in violation, enforcement action is taken by the MBUAPCD.

On occasion, the MBUAPCD receives multiple complaints alleging the same impact or nuisance. This may result in a determination that a business, government agency operation (local, State, or federal), or person(s) is creating a public nuisance. The California Health and Safety Code sec. 41700 and MBUAPCD Rule 402 prohibit emissions of air contaminants from any source that cause nuisance or annoyance to a considerable number of people or that presents a threat to public health or causes property damage. As such, compliance with these rules would preclude land uses proposed under the General Plan from emitting objectionable odors and would, therefore, not result in significant air quality impacts from objectionable odors.

4. Biological Resources

REGULATORY SETTING

Federal Regulations (United States Fish and Wildlife Service)

Federal Endangered Species Act

Pursuant to the requirements of the Federal Endangered Species Act (FESA), a governmental agency reviewing a proposed project within its jurisdiction must determine whether any federally listed threatened or endangered species may be present in the project area, and determine whether the proposed project will have a potentially significant impact on such species. In addition, the agency is required to determine whether the project is likely to jeopardize the continued existence of any species proposed to be listed under FESA or result in the destruction or adverse modification of critical habitat propose to be designated for such species (16 USC 1536[3], [4]).

USFWS Candidate Species List

The United States Fish and Wildlife Service (USFWS) also publishes a list of candidate species. Species on this list receive “special attention” from the federal agencies during environmental review, although they are not protected otherwise under the FESA. The candidate species are taxa for which the USFWS has sufficient biological information to support a proposal to list the species as endangered or threatened.

State Regulations (California Department of Fish and Game)

California Endangered Species Act

Sensitive, endangered, and threatened plants and animals of California are listed pursuant to Section 1904 (Native Plant Protection Act of 1977) and Section 2074.2 and 2077.5 (California Endangered Species Act of 1984) of the California Fish and Game Code (CF&GC). Under the California Endangered Species Act (CESA), the California Department of Fish and Game (CDFG) has the responsibility for maintaining a list of threatened and endangered species. The CDFG also maintains lists of “species of special concern” which serve as “watch lists.” Pursuant to the requirements of CESA, an agency reviewing a proposed project within its jurisdiction must determine whether any State listed endangered or threatened species may be present in the project area and determine whether the proposed project will have a potentially significant impact on such species. In addition, the CDFG encourages informal consultation on any proposed project, which may impact a candidate species.

In addition, it is prohibited to “take” (CF&GC Section 86) species listed as threatened or endangered under CESA (CF&GC 2080) or as fully protected (CF&GC 3511, 4700, and 5050), which is defined by the following:

- Direct mortality;
- Permanent or temporary loss of occupied habitat that would result in mortality to or disruption of reproduction of at least one individual of the species; or
- Avoidance by individuals of biologically important habitat for substantial periods that would result in the mortality or disruption of reproduction to at least one individual of the species.

Determination of Jurisdictional Streambeds

Activities that result in the diversion or obstruction of the natural flow of a stream, or substantially change its bed, channel or bank, or utilize any materials (including vegetation) from the streambed require that the project applicant enter into a Streambed Alteration Agreement with CDFG, under sections 1600-1603 of the California Fish and Game Code. The CDFG potentially extends the definition of stream to include “intermittent and ephemeral streams, rivers, creeks, dry washes, sloughs, blue-line streams mapped on U.S. Geological Survey quad maps, and watercourses with subsurface flows. Canals, aqueducts, irrigation ditches and other means of water conveyance can also be considered streams if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife” (CDFG 1994).

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) implements various treaties and conventions between the U.S. and Canada, Japan, Mexico and the former Soviet Union for the protection of migratory birds. Unless permitted by regulations, the Act provides that it is unlawful to pursue, hunt, take, capture or kill any migratory bird, part, nest, egg or product, manufactured or not. The Act makes it unlawful to ship, transport or carry from one state, territory or district to another, or through a foreign country, any bird, part, nest or egg that was captured, killed, taken, shipped, transported or carried contrary to the laws from where it was obtained. The Act also makes it unlawful to import from Canada any bird, part, nest or egg obtained contrary to the laws of the province from which it was obtained.

Federal Clean Water Act

Areas meeting the regulatory definition of “waters of the U.S.” (jurisdictional waters) are subject to the jurisdiction of the U.S. Army Corps of Engineers (USACE) under provisions of Section 404 of the Clean Water Act (1972) and Section 10 of the Rivers and Harbors Act (1899). These waters may include all waters used, or potentially used, for interstate commerce, including all waters subject to the ebb and flow of the tide, all interstate waters, all other waters (intrastate lakes, rivers, streams, mudflats, sandflats, playa lakes, natural ponds, etc.), all impoundments of waters otherwise defined as “Waters of the U.S.,” tributaries of waters otherwise defined as “Waters of the U. S.,” the territorial seas, and wetlands (termed Special Aquatic Sites) adjacent to “Waters of the U.S.” (Code of Federal Regulations, Title 33, Part 328, Section 328.3). Wetlands on non-agricultural lands are identified using the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory 1987).

Areas not considered to be jurisdictional waters include non-tidal drainage and irrigation ditches excavated on dry land, artificially-irrigated areas, artificial lakes or ponds used for irrigation or stock watering, small artificial water bodies such as swimming pools, and water-filled depressions (Code of Federal Regulations, Title 33, Part 328).

Construction activities within jurisdictional waters are regulated by the USACE. The placement of fill into such waters must be in compliance with permit requirements of the USACE. No USACE permit will be effective in the absence of state water quality certification pursuant to Section 401 of the Clean Water Act. The State Water Resources Control Board and the Regional Water Quality Control Boards are charged with implementing water quality certification in California.

California Native Plant Society

The California Native Plant Society (CNPS) is a statewide non-profit, non-governmental organization with common interest in California’s native plants. It has no governmental decision-making authority. CNPS seeks to protect California native flora and to increase awareness in the general population. CNPS Plant Science Programs focus on plant conservation and emphasize data-driven advocacy through gathering and dissemination of science-based information about California plant communities. CNPS programs seek to promote the use of best-available science by public agencies, local jurisdictions and others involved in the land use decision-making process.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

Section 15064.7 of the CEQA Guidelines encourages local agencies to develop and publish the thresholds that the agency uses in determining the significance of environmental effects caused by projects under its review. However, agencies may also rely upon the guidance provided by the expanded Initial Study checklist contained in Appendix G of the CEQA Guidelines. Appendix G provides examples of impacts that would normally be considered significant. A biological resource impact is considered significant if implementation of the project would result in any of the following:

1. Result in the take of a federally or state listed threatened or endangered species.
2. Have an adverse impact on a substantial portion of a special status species population that is not listed as a federally or state listed threatened or endangered species.
3. Have a substantial adverse effect on any natural communities identified as sensitive in local or regional plans, policies or regulations or by the California Department of Fish and Game and the U.S. Fish and Wildlife Service.
4. Have a substantial adverse effect on significant ecological resources including:
 - a. Cause fish or wildlife populations to drop below self-sustaining levels;
 - b. Threaten to eliminate a plant or animal community;
 - c. Wetland areas including vernal pools;
 - d. Stream environment zones;
 - e. Obstruct wildlife movement zones;
5. Conflict with applicable local, state and/or federal policies and standards associated with biological resources that would result in a physical effect on the environment.
6. Substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of an endangered, rare or threatened species (CEQA Guidelines 15065(a)).

An evaluation of whether or not an impact on biological resources would be substantial must consider both the resource itself and how that resource fits into a regional or local context. Substantial impacts would be those that would diminish, or result in the loss of, an important biological resource, or those that would obviously conflict with local, state, or federal resource conservation plans, goals or regulations.

Analysis Methodology

A number of environmental documents have been prepared for projects in and around Greenfield over the past several years. The combined database resulting from these publicly available documents provides a sufficient representation of the habitat types and biological resources present in the Greenfield area. As a programmatic document, this EIR summarizes those potential resources and provides recommendations for more detailed environmental review for specific proposals.

Project Impacts and Mitigation Measures

Potential Disturbance to Special-Status Plant Species

Impact 4.1 Implementation and buildout of proposed General Plan could impact populations, individuals, or habitat for special-status plant species. This is considered a **potentially significant impact**.

Special Status Plants

Of the 43 special status species identified in a recent CNDDDB query for Greenfield, only Congdon's tarplant (*Centromadia parryi ssp. congdonii*), could potentially occur within the Planning Area. None of the remaining species considered would be expected to occur within the Greenfield Planning Area for the following reasons: the absence of suitable microhabitats (i.e., heavy clay, alkaline and/or serpentine soils, in particular) absence of associate species, such species have either been regarded as extirpated from Monterey County, the most recent occurrences are historic, or the species is considered extinct. However, as a 20-year plan for the City, it is recognized that both the environmental conditions and the regulatory environment may change over time. The General Plan must be able to respond to these changing conditions and establish a process for consistent surveys and mitigation in the event that such plants are found.

Special-Status Plant Species – California Natives

Impact 4.2 Trees and plants identified by the California Native Plant Society as sensitive may be impacted as a result of future site-specific project development. This is a **potentially significant impact**.

California tree-mallow and Monterey pine trees have been identified within the City of Greenfield's Planning Area. These two species (native to California) are considered sensitive by the California Native Plant Society. Although identified specimens observed have been located in the domestic landscapes of residences and are ornamental in origin, the Planning Area could contain additional specimens (or additional native species) during the process of future development project review.

Special-Status Wildlife

Impact 4.3 Implementation of the proposed General Plan could result in direct and indirect impacts on special-status wildlife species and their associated habitats. This is considered a **potentially significant impact**.

Individual project sites within and around Greenfield have been the subject of specific environmental studies that have included site-specific biological resource surveys. The findings of these surveys and the results of the various data base searches have been consistent with regard to the potential occurrence of special-status wildlife species in the Greenfield Planning Area.

Special status species that could reside or forage in the area include San Joaquin kit fox, burrowing owl, nesting and foraging raptor species (including Cooper's hawk, white-tailed kite, golden eagle and prairie falcon), nesting and foraging migratory birds, and pallid bat. Subsequent development under the proposed General Plan could result in direct loss of habitat areas associated with the special-status plant and animal species identified in this chapter.

Mitigation: Program 7.5.A requires that development areas with potential wildlife habitat are surveyed for special status plant and/or animal species. This program requires that if any special status plant or animal species are found in areas proposed for development, the appropriate resource agencies shall be contacted and species-specific management strategies are established to ensure the protection of the particular species. Policy 7.5.1 requires the City to use land use planning to reduce the impact of development on important ecological and biological resources identified during application review and analysis; Policy 7.5.2 encourages preservation of portions of important wildlife habitats that would be disturbed by major development; Policy 7.5.3 requires that open space is developed in an ecologically sensitive manner; Policy 7.5.4 requires that development in sensitive habitat areas should be avoided or mitigated to the maximum extent feasible.

Implementation of these policies and programs in the General Plan would ensure that individual projects are required to analyze and mitigate for site-specific biological resources pursuant to current state and federal protocols for protected species. Implementation of these policies and programs will mitigate impacts to these resources to a **less than significant** level.

Sensitive Habitats and Locally Important Resources

Impact 4.4 Implementation of the proposed General Plan could result in the loss of sensitive habitat areas in the City. This is considered a **potentially significant** impact.

Sensitive habitats and locally important resources in the City's Planning Area consist of isolated wetland areas (including jurisdictional waters of the U.S.), riparian habitat and other natural communities. Although these resources are not common within the proposed Planning Area (due to an absence of significant water features and the extensive amount of agriculture around the City), these resources are nonetheless considered important by the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, California Department of Fish and Game and the City of Greenfield. Subsequent development under the proposed General Plan could result in direct loss of these habitat types and resources in conjunction with individual development projects. In addition to direct impacts associated with habitat loss, indirect effects of future development under the proposed General Plan could impact habitat communities with respect to water quality impacts, introduction of non-native species that disrupt habitat conditions, and associated disturbance from an increased presence of humans and domestic pets.

Mitigation: Policy 7.5.1 requires the City to use land use planning to reduce the impact of development on important ecological and biological resources identified during application review and analysis; Policy 7.5.2 encourages preservation of portions of important wildlife habitats that would be disturbed by major development; Policy 7.5.3 requires that open space is developed in an ecologically sensitive manner; Policy 7.5.4 requires that development in sensitive habitat areas should be avoided or mitigated to the maximum extent feasible.

Implementation of these policies and programs will effectively mitigate habitat impacts to a **less than significant** level.

5. Cultural and Historic Resources

REGULATORY SETTING

Federal Regulations

The National Historic Preservation Act (NHPA), enacted in 1966, was an attempt to preserve the historical and cultural foundations of the American people. Congress found that historic properties significant to the Nation's heritage were being lost or substantially altered, often inadvertently. The preservation of this irreplaceable heritage was in the public interest so that its vital legacy of cultural, educational, aesthetic, and inspirational benefits would be maintained and enriched for future generations of Americans.

Federal regulations for cultural resources are governed primarily by Section 106 of the NHPA. Section 106 requires federal agencies to take into account the effects of their undertakings on historic properties and affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The Council's implementing regulations, "Protection of Historic Properties" can be found in 36 Code of Federal Regulations (CFR) Part 800. The goal of the Section 106 review process is to offer a measure of protection to sites, which are determined eligible for listing on the National Register of Historic Places. The criteria for determining National Register eligibility are found in 36 CFR Part 60. Amendments to the Act (1986 and 1992) and subsequent revisions to the implementation regulations have strengthened the provisions for Native American consultation and participation in the Section 106 review process. While federal agencies must follow federal regulations, most projects by private developers and landowners do not require this level of compliance. Federal regulations only come into play in the private sector if the project requires a federal permit or if it uses federal money.

State Regulations

The California Register of Historic Places serves as the authoritative guide to resources that are considered historic under the California Environmental Quality Act (CEQA). However, simply because a resource is not currently listed in the California Register of Historic Places does not mean that it is not a historical resource. State historic preservation regulations affecting the City of Greenfield General Plan include statutes and guidelines contained in the CEQA: Public Resources Code (PRC) Sections 21083.2 and 21084.1 and Section 15064.5 of the CEQA Guidelines. CEQA requires lead agencies to carefully consider the potential effects of a project on historical resources. A "historical resource" includes, but is not limited to, any object, building, structure, site, area, place, record or manuscript, which is historically or archaeologically significant (PRC Section 5020.1). Section 15064.5 of the CEQA Guidelines specifies criteria for evaluating the importance of cultural resources. Native American concerns and the concerns of other interested persons and corporate entities, including but not limited to, museums, historical commissions, associations and societies be solicited as part of the process of cultural resources inventory. In addition, California law protects Native American burials, skeletal remains and associated grave goods regardless of their antiquity and provides for the sensitive treatment and disposition of those remains (California Health and Safety Code Section 7050.5, PRC Sections 5097.94 *et seq.*).

Any object, building, structure, site, area, place, record or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported

by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852) including the following:

- a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- b. Is associated with the lives of persons important in our past;
- c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- d. Has yielded, or may be likely to yield, information important in prehistory or history.

CEQA emphasizes avoidance of archaeological and historical resources as the preferred means of reducing potential significant effects. If avoidance is not feasible, an excavation program or some other form of mitigation must be developed to mitigate the impacts.

Local Regulations

Monterey County General Plan

The Monterey County General Plan is used as the "blueprint" to guide future development in unincorporated portions of the County, including sections of the Planning Area that are outside the Greenfield city limits. The General Plan contains a series of cultural resource policies that are applicable to the entire Planning Area outside the existing city limits of Greenfield. Those policies address archaeological and historic resources, and provide guidance to property owners for designating, avoiding and mitigating important resources that may be encountered on any given project site.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

Cultural Resources

CEQA establishes statutory requirements for determining the significance of archaeological resources (prehistoric-era) in Section 21083.2 and historical resources (historic-era) in Section 21084.1. Section 21083.2 defines a "unique archaeological resource" as "...an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event."

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Section 21084.1 defines historical resources as those listed on or eligible for listing on the California Register of Historic Places. The two sections operate independently to ensure that significant potential effects on archaeological and historical resources are considered as part of a project's environmental analysis.

The California Register of Historic Places establishes a third set of criteria for determining the significance of historical resources that by definition includes prehistoric-era and historic-era resources (the California State Register Bill, PRC 5020 et seq.). The Register establishes 50 years as the period in which sufficient time has passed to allow a scholarly perspective in understanding the historic importance of a resource. An historical resource must be significant at the local, State or national level under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or,
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

An historical resource must also retain the integrity of its physical identity that existed during the resource's period of significance. It is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

All three sets of criteria must be addressed when evaluating the significance of archaeological and historical resources under CEQA. Resources that are not deemed significant through formal evaluation need not be considered further in the CEQA process. In practice, however, ascertaining that a resource is not "unique," not "important," and does not meet California Register criteria may involve more research, analysis, and testing than if the resource could be avoided or standard mitigation measures adopted for project impacts.

Paleontological Resources

Development of land areas within certain paleoenvironments represented by rocks and geologic fossils would be considered a potentially significant impact given the potential of these geologic units to contain paleontological resources.

Based upon all the above criteria, development under the Greenfield General Plan may result in an impact to cultural or paleontological resources if the implementation of the project results in the following:

1. Causes a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
3. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4. Disturb any human remains, including those interred outside of formal cemeteries.

Analysis Methodology

A series of records searches have been conducted at the Northwest Regional Information Center of the California Archaeological Inventory at Sonoma State University for recent projects within the Planning Area. These searches have been augmented by an examination of in-house files and maps for a series of individual project sites. The records and literature searches have been used to determine the presence of any previously recorded archaeological resources within the vicinity. In addition, a search of the California Inventory of Historical Resources, California Historical Landmarks, and the National Register of Historic Places did not reveal the presence of historic resources in the project area.

Impacts and Mitigation Measures

Prehistoric and Historic Resources

Impact 5.1 Implementation of the proposed General Plan could result in the disturbance of known and undiscovered prehistoric and historic resources in the City. This is considered a **potentially significant** impact.

Development under the proposed City of Greenfield General Plan could conflict with existing known cultural and paleontological resources. In addition to known or assumed resource areas, there is the potential that future development could result in impacts to undiscovered prehistoric and historic resources identified during construction activity. Due to major land disturbance from intensive agricultural activity and distance to major water courses, the archaeological sensitivity of the area is generally low. However, subsurface archaeological resources or artifacts, including Native American artifacts, could be present in any given location due to the history and prehistory of the area.

The City also contains buildings and structures that may be considered historic on a local or state level. Where such structures are located within a proposed development area, the removal, alteration or destruction of that resource may cause a direct impact. Indirect impacts could occur when a resource's context or surroundings are impacted.

Mitigation: Implementation of the General Plan policies and programs contained under Goals 7.6 and 7.7 would effectively mitigate potential cultural and historic resource impacts. Through a combination of "cease and desist" requirements (for archaeology and paleontology) and requiring historic assessments of potentially historic structures as part of the project review process, consistent with existing regulations, impacts for any particular site or structure can be mitigated to a **less than significant** level.

6. Geology and Geologic Constraints

REGULATORY SETTING

State Regulations

California and Uniform Building Codes

The California Building Code and the Uniform Building Code (incorporated by reference within the California Building Code) provide standards for testing and building construction, erosion control, as well as safety measures for development within earthquake prone areas.

Local Regulations

Monterey County Zoning Ordinance

Monterey County planning and zoning documents regulate development within unincorporated areas of the County, including the proposed Greenfield Planning Area outside of the existing city limits. Section 21.66.040 of the Monterey County Zoning Ordinance establishes that development projects located in areas of known geologic hazards are required to submit a geologic report, prepared by a registered geologist, for approval by the Department of Planning and Building Inspection. The report must be consistent with "Guidelines for Geologic/Seismic Reports" of the California Division of Mines and Geology and must include a detailed analysis of the setting and specific development standards to be incorporated into the project's design.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

The CEQA Guidelines (Appendix G) indicate that a proposed project may have potentially significant geologic impacts if it results in any of the following:

1. Destruction or modification of unique geologic features or extensive landform alteration;
2. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving:
3. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;
 - Strong seismic ground shaking;
 - Seismic-related ground failure, including liquefaction; or
 - Landslides.
4. Result in substantial soil erosion or the loss of topsoil;
5. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;
6. Be located on expansive soil, as defined in the California Building Code, creating substantial risks to life or property; or

7. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Analysis Methodology

The evaluation of geology, soils and geologic hazards located within the proposed Planning Area was based on a review of regional reports prepared by Monterey County, the State of California, and various consultants for individual projects in Greenfield.

Impacts and Mitigation Measures

Unique Geologic Features/Landform Alteration

Landform alteration impacts that may result from future development within the Planning Area include land clearing for the construction of roads, building pads, parking areas and other permanent improvements. These improvements will result in grading and compaction from physical development and construction equipment. The Planning Area, located on the floor of the Salinas Valley, is mostly flat and level agricultural land with no hilly areas that would require significant landform alteration. There are no known areas of significant topography or known unique geologic features such as rock outcroppings. Implementation of the General Plan will therefore have a **less than significant** effect on such features.

Ground Rupture

There are no faults mapped across the Planning Area, and the potential for surface fault rupture to impact the proposed development is considered very low. Based upon U.S. Geological Survey maps and information provided by the County of Monterey, the nearest fault line is determined to be the Reliez/Rinconada Fault system approximately five miles to the west. Therefore, development of land uses within the Planning Area would not expose people or property to ground rupture and **no impact** is expected. No mitigation is required.

Seismic Ground Shaking

Impact 6.1 Future development within the Planning Area could expose people or property to severe seismic ground shaking. This is a **potentially significant** impact.

The closest active fault to the Planning Area is the Reliez/Rinconada Fault, approximately five miles west. The San Andreas Fault is located approximately 14 miles to the northeast. No known historical earthquakes have occurred on the Reliez/Rinconada fault; however it is considered an “active” fault. Severe damage can result from ground rupture along a fault trace or from severe ground shaking for any sustained amount of time. In addition, thick, loose materials, such as those found in the project area tend to amplify and prolong the ground shaking during a seismic event. The alluvial materials located in the Salinas Valley area are more susceptible to prolonged and amplified ground shaking during a seismic event than the bedrock in the uplands. All development will be subject to compliance with the latest version of the California Building Code.

Mitigation: Goal 8.1 and its implementing policies and programs (as identified in the Health and Safety Element Chapter 8.0) require that future development comply with all codes and development standards addressing seismic safety, including preparation of site specific geotechnical

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reports and implementation of the recommendations in those reports. The General Plan will therefore reduce the potential impacts of seismic ground shaking to a **less than significant level** by ensuring compliance with all building standards and engineering recommendations.

Seismic Ground Failure/Liquefaction

Impact 6.2 The seismic hazards of the region give rise to the risk of liquefaction, ground settlement and ground failure. This is a **potentially significant** impact.

The Soils Engineering Reports for a number of development projects in Greenfield indicate that subsurface soil conditions in some locations could be susceptible to liquefaction hazards.

Mitigation: Goal 8.1 and its implementing policies and programs (as identified in the Health and Safety Element Chapter 8.0) require future development to comply with all codes and development standards addressing seismic safety, including preparation of site specific geotechnical reports and implementation of the recommendations in those reports. The General Plan will therefore reduce the potential impacts of seismic ground shaking to a **less than significant level**, by ensuring compliance with all State-mandated building standards and engineering recommendations.

Landslides

The Planning Area and its surroundings are generally flat with slopes ranging between zero and two percent. There are no slopes or mapped landslides in the vicinity that possess significant landslide potential either as a result of strong seismic activity or individual site construction. There is very low potential for landsliding or slope stability problems. **No impact** is expected.

Soil Erosion/Loss of Topsoil

Impact 6.3 Land clearing, grading, cut and fill operations, and any other site preparation activities and installation of impervious surfaces such as roads and building pads will increase the risk of soil erosion and loss of topsoil from water and wind. This impact is considered **potentially significant**.

Soil erosion and loss of topsoil may occur with the construction of improvements such as buildings, roads, drainage swales and other permanent improvements that would result from the long-term buildout of the City. Heavy earth moving equipment is used for site grading and compaction, and earth moving during the winter months can increase risks of erosion. In general, grading activities create the potential for increased ground exposure and instability. All disturbed soil is subject to erosion with the amount of erosion dependent on soil type, vegetation cover, slope length and gradient. Some erosion of cuts, fills, roadside drains and downstream areas could occur in association with individual development projects over time.

Mitigation: Erosion resulting from the project can be successfully controlled and prevented using a variety of methods including implementation of all policies and programs of Goal 4.10.1, Drainage Facilities. These policies and programs require that drainage and erosion control plans be submitted for all future development proposals and shall be reviewed by the City building inspection and engineering staff for compliance with all State-mandated codes and laws, implementation of all recommendations of engineering reports and implementation of best management practices by future construction contractors on the site. Specifically, all development must comply with Section

3316 of the California Building Code and Greenfield Municipal Code, which specifies a series of specific measures to avoid impacts from erosion, runoff, loss of topsoil, winter operations, revegetation and maintenance. Implementation of these programmatic measures will reduce potential impacts relative to soil erosion and loss of topsoil to a **less than significant** level.

Mineral Resources

Mineral resource impacts are considered significant if the project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. The Planning Area is not located within any designated Mineral Resource Zones. The project would not result in the loss of access to, or availability of, a known mineral resource that would be of value to the city, region, or state. **No impact** is expected to occur.

Expansive and Unstable Soils

Impact 6.4 Implementation of the proposed General Plan could expose buildings, pavements, and utilities to significant damage as a result of underlying expansive or unstable soil properties. This is considered a **potentially significant** impact.

Implementation of the proposed General Plan could result in construction activities overlying expansive or unstable soils. Newly constructed buildings, pavements, and utilities could be damaged by differential settlement due to soil expansion and contraction. When structures are located on expansive soils, foundations have the tendency to rise during the wet season and shrink during the dry season. Movements can vary under the structures, which in turn create new stresses on various sections of the foundation and connected utilities. These variations in ground settlement can lead to structural failure and damage to infrastructure.

As previously noted, the soil types found in the City of Greenfield are variable and may contain a high shrink-swell potential depending on project location.

Mitigation: Goal 8.1 and its implementing policies and programs (as identified in the Health and Safety Element Chapter 8.0) require future development to comply with all State-mandated codes and development standards addressing geology and soils engineering, to prepare site specific geotechnical reports, and to implement the recommendations in those reports. The General Plan will therefore reduce the potential impacts of adverse soil conditions to a **less than significant level**, by ensuring compliance with all State-mandated building standards, codes and engineering recommendations.

7. Site Hazards and Hazardous Materials

REGULATORY SETTING

Definition of Hazardous Materials

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined in Title 22 of the California Code of Regulations (CCR) as:

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“...a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed (California Code of Regulations, Title 22, Section 66260.10).”

Chemical and physical properties cause a substance to be considered hazardous, including the properties of toxicity, ignitability, corrosivity, and reactivity. These terms are defined in the CCR, Title 22, Sections 66261.20-66261.24. Factors that influence the health effects of exposure to hazardous material include the dose to which the person is exposed, the frequency of exposure, the exposure pathway, and individual susceptibility.

Federal Regulations

Federal Toxic Substances Control Act

Congress enacted the Toxic Substances Control Act (TSCA) in 1976, to become effective January 1, 1977. The act authorizes EPA to secure information on all new and existing chemical substances and to control any of these substances determined to cause an unreasonable risk to public health or the environment. TSCA also includes requirements for the storage, use, and disposal of PCB-containing materials.

State Regulations

California Health and Safety Code

Monterey County is currently responsible for implementing Chapter 6.95 of Division 20 of the California Health and Safety Code (Section 25500 et seq.), relating to hazardous materials release response plans and inventory.

California Water Code

California Water Code Section 231 requires the California Department of Water Resources (DWR) to develop well standards to protect California’s ground water quality. DWR Bulletin 74-90 (Supplement to Bulletin 74-81), California Well Standards, Water Wells, Monitoring Wells, Cathodic Protection Wells, June 1991, contains the minimum requirements for constructing, altering, maintaining, and destroying these types of wells. The standards apply to all water well drillers in California and the local agencies that enforce the standards.

Local Regulations

Monterey County Hazardous Materials Program

The Monterey County Health Department Environmental Health Division manages and regulates the storage, use and disposal of hazardous wastes through the Hazardous Materials Program. This Program provides measures for hazardous waste on-site treatment, spill prevention control and countermeasures for aboveground and underground storage tanks, site mitigation and risk management and prevention.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

For purposes of this EIR, the following criteria were used in determining whether implementation of the proposed City of Greenfield General Plan would result in a significant impact:

1. Subsequent land uses under the proposed General Plan may involve the use, production, or disposal of materials that pose a hazard to people, or to plant or animal populations in the area affected;
2. Expose populated areas to significant hazards through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
3. Expose workers or residences to hazardous materials and health risks during construction or maintenance activities; or,
4. Place land uses in designated hazardous areas inconsistent with applicable plans and policies of federal, state and local agencies.

Analysis Methodology

This analysis of hazards, human health and risk of upset included the review of existing documentation, field review of the Planning Area and consultation with applicable local, state, and federal agencies.

Impacts and Mitigation Measures

Known and Unknown Hazardous Materials in the Planning Area

Impact 7.1 Implementation of the proposed General Plan may result in the discovery of known and unknown hazardous material contamination in areas proposed for development under the General Plan. This is considered a **potentially significant** impact.

Implementation of the General Plan may result in known and unknown hazardous materials being discovered or encountered at specific project sites. Historically, much of the land outside the city limits but within the Planning Area has been used for agriculture and other farming related activities. In addition, urban land uses (e.g., commercial and industrial uses) also can result in hazardous materials contamination. It is common on rural residential and industrial parcels to find sheds and vehicle repair areas with evidence of stored or spilled fluids, pesticides/herbicides and other chemicals.

There are a number of electrical transformers throughout the Planning Area that may contain polychlorinated biphenyls (PCBs). PCB transformers may be located within the existing city limits and outlying areas. There are no known leaking PCB transformers in the existing city limits that pose a threat to human health or safety. However, the City and PG&E must comply with federal and state EPA regulations regarding the maintenance, storage, operation, or disposal of PCB-containing equipment.

Until 1980, numerous types of building materials, such as roofing paper, shingles, drywall, drywall texturing, linoleum, and mastic, contained considerable amounts of asbestos. Many of the existing structures in the Planning Area were built prior to 1980, and therefore may have friable asbestos

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containing materials (ACMs). Many of these buildings may be demolished and/or removed due to development associated with the proposed General Plan. Based on the age of the structures, removal or disturbance of these structures may result in the airborne release of asbestos from ACMs.

Local soils may also contain naturally occurring asbestos. Although such soils have not posed a problem in Greenfield, such soils are found 10 miles to the south in King City. Since the source of naturally occurring asbestos in soil is from the erosion of asbestos-containing rock formations in the adjacent uplands, it is possible that such soils could be present in the Greenfield area.

In 1978, EPA regulations were adopted prohibiting the use of lead in paints and other construction materials. There are several buildings and structures located in the Planning Area that were constructed prior to 1978. Therefore, it is likely that many of the older structures contain lead based paint materials. Implementation of the proposed General Plan may include the demolition and removal of some of these structures.

Mitigation: Chapter 8.0 of the General Plan, the Health and Safety Element, contains specific goals, policies and programs to address the identification and treatment of hazardous materials within the Greenfield Planning Area. Specifically, the implementing policies of Goal 8.4 require compliance with all existing federal, state and local regulations regarding the use, transport and remediation of such materials, as well as requirements for the evaluation and testing of sites that may contain such materials. With implementation of these policies and programs, impacts can be mitigated to a less than significant level.

Airport Operations

Impact 7.2 Implementation of the proposed General Plan could result in safety hazards associated with airport operations near areas proposed for development. This is considered a **less than significant** impact.

Planning boundaries are established for height, noise and safety around each airport and active airfield. Airport planning activities also establish policies that determine the compatibility of new land uses proposed within each planning area boundary. State Airport Land Use Commission (ALUC) law requires a jurisdiction to either amend its General Plan and other land use regulations to achieve consistency with airport Comprehensive Land Use Plans (CLUPs) adopted by the ALUC.

Additionally, the Federal Aviation Regulations (FAR) Part 77 defines a series of imaginary surfaces surrounding all public use airports. Any proposed object or structure that would penetrate any of these imaginary surfaces as they apply to the affected airport facilities is considered by the Federal Aviation Administration (FAA) to be an obstruction to air navigation. An obstruction to air navigation may not be a hazard to air navigation, however, the FAA presumes it to be a hazard and treats it as such until an FAA aeronautical study had determined that it does not have a substantial adverse effect on the safe use of the navigable airspace by aircraft. The imaginary surfaces the FAA uses to determine whether or not a structure or an object would be an obstruction to air navigation includes the primary surface, approach surface, horizontal surface, conical surface, and transitional surfaces. The CLUP determines compatibility of surrounding land uses based upon height restrictions, noise levels associated with the airport operations, and exposure of persons to crash hazards.

The Yanks Air Museum project will be located at the north end of the City. The project will contain an active airstrip; however, the airfield and museum are not proposed as a public general aviation facility. As such, flights into and out of the facility are expected to be infrequent. To anticipate flight patterns and to acknowledge the location of this airfield, the General Plan has designated Artisan Agriculture/Visitor Serving (AAVS) land uses in the northeast portion of the Planning Area from the northern boundary of the Planning Area south to Pine Avenue. This low-intensity, low-population land use is compatible with the airfield and flight patterns anticipated and therefore will not conflict with FAA regulations. Hazards from the Yanks Air Museum are therefore considered **less than significant**. No mitigation is required.

8. Hydrology and Water Quality

REGULATORY SETTING

Federal Regulations

Federal Clean Water Act

Water quality objectives for all waters in the State are established under applicable provisions of Section 303 of the Federal Clean Water Act (CWA) and the State Porter-Cologne Water Quality Control Act. The State Water Resources Control Board (SWRCB) and the Central Coast Regional Water Quality Control Board (CCRWQCB) are responsible for assuring implementation and compliance with the provisions of the CWA and the Porter-Cologne Water Quality Act.

Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. Section 304(a) requires the Environmental Protection Agency (EPA) to publish water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in the water. Water quality standards are typically numeric, although narrative criteria passed upon biomonitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards. Section 303(c)(2)(b) of the CWA requires states to adopt numerical water quality standards for toxic pollutants for which the EPA has published water quality criteria and which reasonably could be expected to interfere with designated uses in a water body.

National Pollutant Discharge Elimination System

Pursuant to the 1987 Amendments to the Clean Water Act and 1991 regulations promulgated by the EPA, the SWRCB has adopted the National Pollutant Discharge Elimination System (NPDES) with two general permits for stormwater dischargers. One permit applies to industrial dischargers and the other permit relates to construction activities.

NPDES was established by the CWA to regulate municipal and industrial discharges to surface waters of the United States. Each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. Sections 401 and 402 of the CWA contain general requirements regarding NPDES permits. Section 307 of the CWA describes the factors that EPA must consider in setting effluent limits for priority pollutants.

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The purpose of the NPDES program is to establish a comprehensive stormwater quality program to manage urban storm water and minimize pollution of the environment to the maximum extent practicable. The NPDES program consists of: 1) characterizing receiving water quality, 2) identifying harmful constituents, 3) targeting potential sources of pollutants, and 4) implementing a Comprehensive Stormwater Management Program (CSWMP).

State Regulations

Central Coast Regional Water Quality Control Board

CCWQCB is the local agency of SWRCB and is responsible for the issuance of NPDES permits under the CWA and on behalf of the SWRCB and the EPA for activities that could cause water quality impacts to surface waters and groundwater, including construction activities. Since development subsequent to the General Plan would result in the disturbance of five or more acres, an NPDES construction activities permit would be required. The permit requires that the following general measures be implemented during construction activity:

- Eliminate or reduce non-storm water discharges to stormwater systems and other waters of the U.S.;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP); and,
- Perform inspections of stormwater control structures and pollution prevention measures.

California Water Code

California Water Code Section 231 requires the California Department of Water Resources (DWR) to develop well standards to protect California's ground water quality. DWR Bulletin 74-90 (Supplement to Bulletin 74-81), *California Well Standards, Water wells, Monitoring wells, Cathodic protection wells, June 1991*, contains the minimum requirements for constructing, altering, maintaining, and destroying these types of wells. The standards apply to all water well drillers in California and the local agencies that enforce them.

Local Regulations

City of Greenfield Ordinances

New development projects in Greenfield are required to store and percolate 100 percent of the stormwater runoff from a 25-year storm event. Runoff that exceeds the quantity of a 25-year event is allowed to back into the street to a depth not deeper than the curb, which is approximately eight inches. Projects typically involve the use of detention ponds to store and percolate runoff.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

The following thresholds for measuring a project's environmental impacts are based on CEQA Guidelines and generally accepted standards for environmental documents prepared pursuant to CEQA and the City's environmental checklist. An impact to surface hydrology and water quality is considered significant if implementation of the proposed project will result in any of the following:

1. Violate any water quality standards or waste discharge requirements;
2. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in, or contribute to, flooding on- or off-site;
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site;
4. Significantly degrade surface water quality due to erosion, urban runoff, on-site sewage treatment and disposal system, or other factors, as a result of either construction activities or daily operation;
5. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
6. Expose people or structures to flood hazards as a result of development within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map or place within a 100-year flood hazard area structures which would impede or redirect flood flows;
7. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam;
8. Inundation by seiche, tsunami, or mudflow; and
9. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

Analysis Methodology

The programmatic hydrology and water quality analysis is based on review of the City of Greenfield General Plan and Zoning Code; published information and technical reports regarding local and regional hydrology, climate, and geology; consultation with agency representatives and letters received from Responsible Agencies during the Notice of Preparation review period.

Project Impacts and Mitigation Measures

Water Quality Standards

Impact 8.1 Development within the Greenfield Planning Area may result in violation of water quality standards associated with individual development projects over time. This is a **potentially significant** impact.

Buildout of the General Plan will result in the planning and construction of residential, industrial, commercial and public land uses over approximately 1,300 acres of land beyond the existing City limits. There is potential for these uses to discharge non-point source automobile-related waste products from driveways and streets and point source pollution from industrial uses into the storm water system. Such discharge could violate Federal Clean Water Act standards if not appropriately

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mitigated. Water quality could also be affected by construction activity, particularly by site preparation and grading during the rainy season.

Drainage Pattern / Localized Flooding and Erosion

Impact 8.2 Development resulting from General Plan buildout would alter existing drainage patterns, increase areas of impervious surfaces, and increase surface water runoff thus contributing to localized drainage, flooding and erosion problems within the City. This is a **potentially significant** impact.

Buildout of the General Plan will involve grading activities typical of development on relatively flat terrain. Implementation of the Plan over time will result in the eventual conversion of hundreds of acres of vacant and agricultural land to residential, industrial, commercial and public uses. The conversion of this land would increase the amount of surface area impervious to water, such as pavement, roofing and walkways, and would therefore increase stormwater runoff and alter existing drainage patterns. Grading activities may alter existing drainage patterns and lead to erosion and siltation. In accordance with City standards, the design criteria for drainage basins is to control runoff in excess of a 25-year storm event. However the General Plan contains additional policies and programs to address City-wide storm drainage.

Mitigation: Goals 4.10 and 8.2 address drainage facilities and flood protection in Greenfield. Consistent with the policies and programs that implement these goals, drainage and erosion control plans must be reviewed and approved by the Public Works Director and City Engineer as part of the Tentative Map process. Best Management Practices must be identified to demonstrate control of erosion and water quality impacts during construction. Stormwater Pollution Prevention Plans are required for larger projects and all projects must demonstrate compliance with standards and regulations as required by the State Water Resources Control Board. Implementation of these standards and regulations over time will mitigate drainage, runoff, and water quality impacts to a **less than significant** level.

Flood / Inundation Hazards

Impact 8.3 The General Plan Planning Area and SOI are not within the recognized 100-year flood plain. Therefore, the impact is considered **less than significant**.

According to FEMA Flood Insurance Rate Map Community Panel No. 060195 0375 D (General Plan **Figure 8-3**), the Planning Area is not located within a 100-year flood zone. The Planning Area may be affected to a small degree by inundation resulting from the failure of either the Nacimiento or San Antonio Reservoir Dams as identified in the *Greenfield General Plan*; however, according to the *Monterey County Central Salinas Valley Area Plan*, the area is not subject to dam failure inundation. The Planning Area is not located in a coastal area or near a large inland body of water and is therefore not subject to tsunami or seiche and it is relatively flat and is not subject to mudflow. Therefore, floodplain hazards and impacts from potential inundation are **less than significant**. No mitigation is required.

9. Land Use and Planning

REGULATORY SETTING

The purpose of this section is to evaluate the proposed project for land use consistency with relevant adopted plans and policies. These include the Cortese-Knox Government Reorganization Act, policies of the Local Agency Formation Commission (LAFCO), City of Greenfield and Monterey County.

Local Regulations

Local Agency Formation Commission

Monterey County LAFCO is responsible for coordinating logical and timely changes in local governmental boundaries (reorganizations), including annexations, incorporations of new cities, Sphere of Influence amendments and boundary changes in special districts such as school and utility districts.

LAFCO has adopted policies to guide the agency in its decision-making process, as identified in its *Standards for the Evaluation of Proposals*. According to this document, the underlying purpose of Monterey County LAFCO is to discourage urban sprawl, preserve important farmland, and encourage the orderly formation and development of local agencies. Monterey County LAFCO is currently engaged in the process of preparing Municipal Service Reviews (MSRs) for various geographic areas of the County, including South and Central Monterey County, where Greenfield is located. It is LAFCO's intent to complete the MSR for this area in order to evaluate the City's proposed Planning Area and requested Sphere of Influence Amendment in the context of future development within the entire Salinas Valley.

City of Greenfield Permitting Process

The City of Greenfield regulates land development within the City through the permitting process. All projects proposed subsequent to adoption of the new General Plan will undergo review by the Planning Commission and City Council as appropriate, consistent with current process.

Monterey County Land Use Policy

The County of Monterey regulates land use in the unincorporated areas adjacent to the City of Greenfield. Relevant policies and programs are contained in the *County of Monterey General Plan*, and the *Central Salinas Valley Area Plan*. The County will be a reviewing agency with the opportunity to comment on the City's proposed planning documents. County policies will remain in effect within the City's new Sphere of Influence; however, upon approval of the new boundary by LAFCO, the City, County and LAFCO will recognize the Sphere and Planning Area as the future city limits of the City of Greenfield.

Standards of Significance

The following thresholds for measuring a project's environmental impacts are based on CEQA Guidelines and other performance standards recognized by the City of Greenfield. For the purposes

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of this programmatic EIR, impacts are considered significant if the following would result from implementation of the proposed General Plan:

1. Conflict with the adopted goals and policies of any relevant planning program adopted for the purpose of avoiding or mitigating environmental effects;
2. Conflict with any applicable habitat conservation plan or natural community conservation plan;
3. Physically divide an established community; or
4. Involve land uses that are found to be incompatible with surrounding uses, or internally incompatible.

Analysis Methodology

The evaluation of potential land use impacts is based on field reconnaissance of the City's Planning Area, review of several policy documents including the City of Greenfield General Plan and Municipal Code, Monterey County General Plan and Central Salinas Valley Land Use Plan, and letters received during the Notice of Preparation review period.

Project Impacts and Mitigation Measures

Conflict with Adopted Goals and Policies

Impact 9.1 The Greenfield General Plan introduces new and expanded urban land uses (together with goals, policies and programs to implement those land uses) in an area consisting primarily of low-density, rural and agricultural land uses. Implementation of the General Plan will result in a **less than significant** impact with respect to other relevant planning programs.

The primary planning policies in effect to avoid environmental impact are those policies used by Monterey County LAFCO to evaluate boundary reorganizations by local agencies and districts. With respect to agricultural land conversion and the project's relationship to agricultural policy, please see Section 2, Agricultural Resources.

Other related LAFCO policies address urban sprawl and the ability of a city to provide adequate public service. These factors have been considered by the City of Greenfield General Plan. The land use pattern increases the city's physical size by approximately 1,300 acres; however, this land area surrounds the existing city limits in a concentric pattern, and only responds to the anticipated population growth over time that is occurring in Greenfield and other Salinas Valley communities. The land use pattern does not "leap-frog" into other County land areas and does not stretch north or south along the Highway 101 corridor. The City's physical land plan maintains the downtown area as the city's nucleus, and represents a "compact" urban design while planning for more than a doubling of the population over 20 years.

Proposed uses in the City's Planning Area will increase the density of development in an area predominated by agricultural land use with a County density of 1 unit per 40 acres. The City has shown an ability to serve the planning area with adequate water, sewer and public services and utilities (See Section 13, Public Services and Facilities) through infrastructure planning and the assessment of fees to fund the expansion of services.

Although the more intensive land use pattern proposed by the General Plan will change land use densities, this change represents a planned response to housing and population growth in the area and will not directly conflict with County plans and land use policies on adjacent lands beyond the Planning Area. The City has considered County policies within the Greenfield General Plan, and has proposed numerous policies and programs that are consistent with the County's plans (see General Plan Chapter 1, Land Use Element). The General Plan also responds to LAFCO policy with respect to discouraging sprawl and providing land use buffers between new urban uses and existing agricultural operations. The City has planned a future boundary that reflects natural constraints and presents logical planning boundaries with a compact development pattern. The Plan incorporates significant areas of high density, medium density and mixed-use development to discourage low-density sprawl. For these reasons, and because the City can adequately serve the Planning Area with public services, potential conflicts with other relevant plans and policies are considered **less than significant** in terms of environmental effect.

Other Land Use Issues

The Greenfield General Plan will not conflict with any habitat conservation plan or natural community conservation plan, as no such plans have been adopted in the area. The Plan will build upon the existing land use pattern and will not disrupt or divide any established community or neighborhood. For these reasons, there are **no impacts** associated with these issues. Compatibility with surrounding land uses, primarily with agricultural land uses, is analyzed in Section 2, Agricultural Resources.

10. Noise

REGULATORY SETTING

State Regulations

Government Code 65302(f) establishes the requirement for a Noise Element to “identify and appraise noise problems in a community” and to “analyze and quantify, to the extent practicable, . . . current and projected noise levels.” This Noise Element must identify these sources of noise and provide noise contours – distances at which a predicted noise level will occur. The intent of the Noise Element is to provide useful information and policies to prevent development in areas that are unsuitable due to excessive noise. A complete Noise Element and future conditions noise analysis was conducted by Bollard & Brennan, Inc. in support of the Greenfield General Plan. The report's findings have been included within the General Plan and this program EIR. The original Bollard & Brennan report is included in its entirety within the Appendices to the General Plan.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

CEQA Guidelines suggest that implementation of a project would result in significant noise impacts if the project would result in any of the following:

1. Exposure of persons to, or generation of, noise levels in excess of standards established in the local plans or ordinances.
2. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

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3. A substantial permanent increase in ambient noise levels in the project vicinity above levels without the project.
4. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, where the project would expose people residing or working in the area to excessive noise levels.
6. For a project within the vicinity of a private airstrip, where the project would expose people residing or working in the project area to excessive noise levels.

Analysis Methodology

The noise impact analysis is based on the Noise Element prepared by Bollard & Brennan, Inc. The analysis consisted of a community noise survey at various locations within the City, measurements of existing noise levels along area roadways, and noise prediction modeling to estimate future noise levels with implementation of the General Plan.

Project Impacts and Mitigation Measures

Construction Noise Impacts

Impact 10.1 Buildout of future land uses within the Planning Area and development of individual projects (large and small) will result in temporary noise impacts due to construction. This is a **potentially significant impact** and predictable consequence of future development resulting from General Plan implementation.

The City of Greenfield anticipates that development of future projects will, on a case-by-case basis, result in construction noise that could pose a nuisance to adjacent properties. Activities associated with construction will result in elevated noise levels, with maximum noise levels ranging from 85-88 dB at 50 feet.

Mitigation: The goals, policies and programs of the General Plan Noise Element (General Plan Chapter 9.0) addresses construction-related noise through enforcement of the City's noise ordinance. The Ordinance specifies limitations on construction hours and other measures to reduce such noise to acceptable levels. Continued implementation of General Plan policy and enforcement of the ordinance will reduce impacts to a **less than significant** level.

Traffic Noise Impacts

Impact 10.2 Increases in traffic generation as a result of General Plan implementation will result in elevated noise levels along local roadways and Highway 101. This is a **potentially significant** impact of General Plan implementation.

Implementation of the proposed General Plan would result in increased traffic noise levels from roadway improvements, generated by additional vehicle traffic. **Table 9-7** in the Noise Element compares existing traffic noise levels with noise levels after General Plan implementation, and shows a significant increase along key roadway segments. Noise levels are expressed in Table 9-7

in terms of distance to the 60 and 65 dB Ldn noise contours. The contour distance provides an estimate of how far away from a given roadway segment the critical noise threshold will be reached. These distances provide an indication where noise attenuation measures may be required in the future to reduce noise levels at sensitive land uses, such as residential areas, hospitals and schools.

Mitigation: Chapter 9.0 of the General Plan, the Noise Element, provides detailed information regarding noise compatibility, acceptable noise thresholds for interior and exterior urban areas, and provides guidelines regarding the submittal of acoustic analyses for future projects. The goals, policies and programs within the Noise Element provide sufficient analysis thresholds and provide recommendations for attenuation, which emphasize site planning and design, rather than walls and barriers, as a preferred method for mitigation. Compliance with the Noise Element will mitigate increases in noise generation to a **less-than-significant** level.

Noise Caused by Stationary and Agricultural Land Uses

Impact 10.3 Buildout of the General Plan could result in noise impacts between incompatible land uses. This is a **potentially significant** impact.

The General Plan designates significant industrial acreage while the City is virtually surrounded by agricultural land. Both of these uses can generate noise levels that exceed adopted standards. When a noise generating land use interfaces with a more sensitive use (such as neighborhoods, hospitals and schools) measures must be taken to avoid significant effects.

Mitigation: Chapter 9 of the General Plan, the Noise Element, provides detailed information regarding noise compatibility, acceptable noise thresholds for interior and exterior urban areas, and guidelines regarding the submittal of acoustic analyses for future projects. The goals, policies, and programs within the Noise Element provide sufficient analysis thresholds and recommendations for attenuation, which emphasize site planning and design, rather than walls and barriers, as the preferred method for mitigation. Compliance with the Noise Element will mitigate increases in noise generation to a **less than significant** level.

Other Noise Issues

The north end of the Planning Area contains the Yanks Air Museum project, which will include a private airstrip. In response to both noise and land use concerns, the northern portion of the project area contains AAVS land uses, a very low density and agricultural use that will be compatible with the airstrip. With regard to ground vibration, the Planning Area does not contain railroads or other typical sources of ground vibration. For these reasons, noise impacts beyond traffic and construction noise will be **less than significant**.

11. Population and Housing

REGULATORY SETTING

Local Regulations

Association of Monterey Bay Area Governments (AMBAG)

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AMBAG is a regional planning association whose function is primarily planning related rather than regulatory. The association is a forum for planning, discussion, and study of regional problems of mutual interest and concern to the counties and cities in Monterey, San Benito and Santa Cruz Counties. AMBAG regularly prepares studies, plans and policy recommendation to address regional issues, including issues directly related to population and housing growth. The City of Greenfield is a member of AMBAG.

County Regulations

County of Monterey

Monterey County monitors regional growth, including the growth of incorporated cities, in order to track county-wide land use issues, population trends and housing conditions. As Greenfield's proposed Sphere of Influence will expand into lands currently under County jurisdiction, the County will serve as a reviewing and commenting agency. County planning policy has traditionally supported population growth within incorporated cities instead of within rural areas that are more difficult to serve with public services and infrastructure.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

An impact is considered significant if it will:

1. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);
2. Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere; or
3. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Analysis Methodology

This section relies upon the data of the General Plan to assess projected population and housing impacts within the Planning Area. Chapter 2.0 of the General Plan, the Land Use Element, contains all relevant existing setting information and population projections. Chapter 6.0, the Housing Element, provides data on existing and projected housing conditions and needs.

Impacts and Mitigation Measures

Population Growth

Impact 11.1 Implementation of the Greenfield General Plan will directly induce substantial population growth in the area in and around the existing City of Greenfield. This is a **potentially significant** impact.

Based upon the standards of significance, the General Plan will induce population growth, as the population of Greenfield is projected to increase during a 20 year period from approximately

15,000 to over 36,000 if all proposed land uses build out to maximum density. This information is contained within Chapter 2.0 of the General Plan, the Land Use Element, Table 2-6.

As a General Plan and blueprint for the City's next 20 years of growth and planning, most foreseeable environmental impacts are population based. Traffic and circulation, air quality, increases in noise, and demands upon public services are the primary population-based effects. As such, the reader is directed to discussions of those topic areas to understand the direct and indirect effects of the City's anticipated population growth.

The General Plan is not anticipated to result in significant indirect effects, such as through the extension of roads or infrastructure. As those systems are incorporated as part of the General Plan process, the analysis assumes that the Planning Area boundaries will contain projected growth, and policies exist to discourage sprawl and additional growth beyond those boundaries.

Mitigation: As discussed above, traffic, air quality, noise and increased demand upon public services are the primary population-based environmental effects resulting from substantial increases in population growth. As discussed in Chapters 3.0, 4.0, 8.0 and 9.0, respectively, the General Plan provides a series of applicable policies and programs to address these population-based effects. Through logical planning (as demonstrated in the Land Use Element) and the implementation of ordinances, regulations, fees, system upgrades, and conservation measures described in those chapters, physical environmental effects from increased population can be effectively reduced to a **less than significant** level.

12. Public Services and Facilities

REGULATORY SETTING

Please see Chapter 4.0 of the General Plan, Growth Management Element, for a comprehensive discussion of existing fire and police service, schools, water and wastewater systems, drainage facilities, utilities and civic facilities. Information regarding Parks and Recreation is included in Chapter 7.0 of the General Plan, the Conservation, Recreation, and Open Space Element.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

The following thresholds for measuring a project's environmental impacts are based on CEQA Guidelines and previous standards used by the City. For the purposes of this programmatic EIR, impacts are considered significant if the following could result from implementation of the General Plan:

- 1) A substantial increase in demand for an adequate water supply over the existing condition;
- 2) An inability to provide an adequate water supply, including facilities for treatment, storage and distribution;
- 3) Require substantial expansion or alteration of the City's wastewater treatment or collection facilities;
- 4) Result in a substantial increase in wastewater flows over current conditions and capacities;

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- 5) A need for a new or physically altered government facility, the construction of which could cause significant physical or environmental impacts, in order to maintain acceptable law enforcement or fire service levels;
- 6) Substantial increases in demand necessitating new or extended electric, natural gas, telephone or cable services in excess of the ability to provide service, in a manner that would create physical environmental effects;
- 7) Result in additional students in numbers great enough to create physical overcrowding or other physical strain on existing school facilities;
- 8) Create a demand for solid waste services and generate solid waste in an amount greater than the ability of landfill facilities to accommodate such waste; and/or
- 9) Increase demand for park and recreational services such that substantial physical deterioration of the parks or recreational facilities would occur or be accelerated.

Analysis Methodology

The analysis of potential public service and utility impacts is based upon review of the City of Greenfield facility master plans, discussions with City staff, environmental documents for recently approved projects, information gathered through LAFCO's MSR process, and information updates supplied by City service providers throughout the General Plan update process. Additional analysis is based upon letters received from Responsible Agencies during the Notice of Preparation review period.

Project Impacts and Mitigation Measures

Water Demand

Impact 12.1 Implementation of the City's General Plan will result in a substantial increase in demand for potable water supplies. This is a **less than significant** impact.

As described in the Growth Management Element (Chapter 4.0), buildout of the General Plan and resulting residential and non-residential growth may increase annual water demand from 1,811 acre feet annually (AFY, 2003) to 5,937 AFY. However, according to the City's water master plan, the City has the capacity to provide 6,500 AFY with expansion of its system. With this available supply, the increase in demand will be less than significant. Please see also Cumulative Impacts later in this section for additional discussion on water supply. In addition, the General Plan Chapter 4.0 contains a series of policies (Goal 4.8 and related policies) intended to promote water conservation and management to further reduce demands upon groundwater extraction.

Water Infrastructure

Impact 12.2 Implementation of the City's General Plan will result in the need to expand water pumping, treatment, storage, and distribution facilities. Construction of these facilities is considered a **potentially significant** environmental impact.

The City's water master plan identifies the need for up to three additional municipal wells, 2.75 million gallons in storage, and a series of pumps and distribution lines to serve new land uses beyond the exiting service boundaries. The physical construction of these facilities can be expected

to result in site-specific environmental issues related to ground disturbance, biological resources, possible traffic disruption, noise and other localized effects.

Mitigation: Any public facility project such as the construction of new water system infrastructure will be considered a project under CEQA, or will be constructed as part of an individual environmental review. In addition, the policies and programs of the General Plan Chapter 4.0 (Growth Management) encourage conservation measures to limit the need for additional infrastructure, as well as policies to place new infrastructure in existing roads and rights-of-way to minimize environmental disturbance as much as possible. These policies and measures will result in **less than significant** impacts when the City expands its infrastructure.

Increased Wastewater Flows

Impact 12.3 Implementation of the General Plan will result in increased demands upon the wastewater collection, treatment and disposal facilities. This increase is considered a **potentially significant** impact.

Daily flow through the City's wastewater system is approximately 0.88 million gallons per day (MGD). Until recently, the permitted capacity was 1.0 MGD. The City has recently received approval to treat and dispose 2.0 MGD, and is in the process of implementing a series of treatment plant improvements toward that goal. Although this increased capacity will accommodate the City's growth well into the future, wastewater generation may exceed capacity at buildout if all land uses are maximized.

Mitigation: Goal 4.9 and its implementing policies and programs in Chapter 4.0 of the General Plan require coordination of development activity with monitoring capacity within the wastewater system. The policies and programs require developer financing of improvements and assurance of capacity prior to development to ensure that development does not outpace capacity. Policies are also provided to encourage use of reclaimed water in order to delay the need for future expansions of the treatment plant. These measures, together with currently permitted capacity and capacity improvements that are underway, will reduce potential impacts to a **less than significant** level.

Fire and Police Services and Related Infrastructure

Impact 12.4 Implementation of the General Plan will result in an increased demand for police and fire protection services and related physical infrastructure. This increased demand is a **potentially significant** impact of the project.

With an estimated doubling of population over the next 20-year period, demand upon fire and police resources will accordingly increase. In addition, new facilities and stations to support a growing public protection system will also need to be constructed. The Greenfield Police Department, for example, may require up to 23 additional officers, support staff and additional patrol cars. Compared to existing resources, this increase is **potentially significant**.

Mitigation: Goals 4.4 and 4.5 of the General Plan address police and fire service levels. The implementing policies and programs outline a number of methods by which these service providers will continue to maintain acceptable service levels. As with other public services, policies call for fair share financing through new development to offset the cost of additional service needs. The City has already considered and reviewed a new police station facility at Elm Street and 5th Street,

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which will accommodate the police department into the near future. Implementation of the General Plan's policies and programs will maintain performance standards for police and fire facilities, and therefore will mitigate related impacts to a **less than significant** level.

Utility Services

Impact 12.5 Implementation of the General Plan will result in the need for expanded electric, natural gas, cable and telephone service beyond the service capacity of existing systems. This is a **less than significant** impact.

All utility systems provided in the City of Greenfield are through private service providers. All providers have indicated that they can continue to expand their networks to provide service within the Greenfield Planning Area, as development patterns are contiguous and there are no unique constraints to providing service. All expanded systems will also be coordinated with the construction and permitting of new development. As such, the extension of those systems will result in **less than significant** impacts.

Schools and Student Generation

Impact 12.6 Implementation of the General Plan will result in additional students at levels that could strain the capacity of existing school facilities. This is a **potentially significant** impact.

As identified in the Growth Management Element, with full buildout of all residential land uses at maximum density, the General Plan could generate almost 5,000 new K-12 students. Although this is a maximum estimate, it is clear that existing facilities could not accommodate this level of student generation.

Mitigation: The General Plan Chapter 4.0, Growth Management Element, contains a series of goals, policies and programs to address future school facilities and new student generation. The key to these policies is an increased level of coordination with the affected districts to maximize financial resources and involve the districts within the planning process to ensure that District Master Plans and residential building permits issued by the City are coordinated to meet demand as facilities are needed. Implementation of these policies and programs and coordination with the districts throughout the planning and development process will mitigate facility impacts to a **less than significant** level.

Solid Waste Service and Disposal

Impact 12.7 Implementation of the General Plan would increase demand for solid waste services and generate additional volumes of solid waste for disposal. This is a **less than significant** impact.

According to the General Plan, the Johnson Canyon Landfill has available capacity through the year 2042. Other regional disposal facilities, such as the Marina landfill, have indicated excess capacity due to recent successes in mandated recycling goals. Goal 4.7 of the General Plan and its implementing policies and programs address solid waste and recycling programs in Greenfield. Policies that promote the reduction in solid waste generation such as solid waste resource recovery,

composting, recycling, together with available land fill capacity, will ensure that solid waste impacts remain **less than significant**.

Parks and Recreation Facilities

Impact 12.8 Implementation of the General Plan will increase demand for park and recreation facilities to serve new and existing residents of Greenfield. This is a **potentially significant** impact.

Providing new parks and maintaining existing facilities in Greenfield has been challenging in recent years as the City's park fees struggle to keep pace with land values and other costs. A number of new residential development projects have contributed park fees rather than build parks into project design, meaning that the City is now in a position to utilize those fees to maintain levels of service. With additional residential uses foreseeable in the near future, it will be critical for the City to approach park planning, including joint-use facilities with school districts, in a coordinated manner in order to ensure adequate parks and recreation facilities. Existing facilities will not serve the growing population.

Mitigation: Chapter 7.0 of the General Plan, the Conservation, Recreation and Open Space Element, addresses park and recreation facilities. Policies under Goal 7.2 specify park performance standards and guidelines for park location. These policies also encourage incorporating parks into project design as opposed to simply contributing fees. The detailed policies and programs of the General Plan provide a coordinated approach to planning, financing and constructing adequate park facilities. As such, the General Plan will mitigate this impact to a **less than significant** level.

13. Traffic and Circulation

REGULATORY SETTING

County Regulations

Monterey County Public Works Department

The intersection operation level of service (LOS) standard utilized by Monterey County is "C". Based on the County's *Criteria for Significant Impacts at Intersections* (County Public Works Department report first adopted in 1980 and revised in 1996), a significant impact will occur if an intersection operating at LOS "A", "B" or "C" degrades to "D", "E" or "F." For intersections already operating at unacceptable levels of "D" and "E", a significant impact will occur if a project adds 0.010 or more to the critical movements volume to capacity ratio. If the intersections are already operating at LOS "F", any increase (one vehicle) in critical movements is considered significant (see also Standards of Significance criteria below).

Local Regulations

City of Greenfield Codes and Ordinances

Construction, maintenance and use of the City roadway system is enabled and regulated by the City of Greenfield Municipal Code and General Plan.

Regional Regulations

Regional Transportation Plan

As the Regional Transportation Planning Agency, the Transportation Agency for Monterey County (TAMC) is responsible for developing a plan that reflects the needs, concerns, and actions of all the agencies involved in the region and of the public. In consultation with its Technical and Citizens Advisory Committees, TAMC staff prepares and updates the Regional Transportation Plan. The original Monterey County Regional Transportation Plan (RTP) was adopted in 1975 and the most recent plan update was adopted in 1994. The purpose of the RTP is to provide policy guidance, plans, and programs for the next twenty years to attain a balanced, comprehensive, multimodal transportation system. The RTP proposes solutions, considers all modes of travel, and identifies anticipated funding for projects and programs. The RTP addresses special factors affecting the transportation system, such as air quality, land use, special transportation needs and multimodal integration.

Congestion Management Program

The primary objective of the Congestion Management Program (CMP) is to reduce traffic congestion and improve mobility for persons and freight. The policies and objectives of the CMP are intended to insure that traffic circulation improves, or is at least maintained, as population increases in Monterey County. The CMP encourages each city and the County to address the regional transportation issues related to land use decisions with the goal to mitigate the traffic impacts associated with proposed development. For the CMP to be a success, the cities and the County must work together to find cooperative solutions to multi-jurisdictional transportation problems. In addition, the CMP must be consistent with the Regional Transportation Plan and its goals. The current CMP was adopted in 1994 and staff is in the process of completing an update.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

The following thresholds for measuring a project's environmental impacts are based on CEQA Guidelines and accepted standards used by the City of Greenfield. For the purposes of this EIR, impacts are considered significant if the following could result from implementation of the proposed project:

1. Increase traffic and degrade the level of service of roadways or intersections below LOS "C", except in specific locations of higher urban density, where the standard shall be "D";
2. Exacerbate existing traffic conditions that are currently experiencing an unacceptable LOS;
3. Cause the need for a signal at an unsignalized location;
4. Result in insufficient parking capacity onsite or offsite as calculated by City standards;
5. Result in roadway design inconsistent with engineering or safety standards or cause unsafe conditions for pedestrians or bicyclists;
6. Impact existing transit systems; or

7. Result in a disruption of the operations of existing uses, such as schools.

Analysis Methodology

The Greenfield General Plan traffic impact analysis was conducted as part of the Circulation Element prepared by Higgins Associates, January 2005. That report is included in its entirety within the Appendices to the General Plan.

Project Impacts and Mitigation Measures

Increased Traffic and Levels of Service

Impact 13.1 Buildout of the General Plan will require significant improvements to the roadway network to maintain acceptable levels of service. The need for these facilities and improvements, as well as the environmental consequences of their construction, represent a **potentially significant** impact of General Plan implementation.

The existing roadway network would not support the range and intensity of land uses proposed by the General Plan. Based on the trip generation from new land uses as analyzed by Higgins Associates, the roadway network under General Plan Buildout will require improvements to a number of existing roadways, as well as major improvements such as a new north/south arterial, improved Highway 101 interchanges (including the Thorne Road interchange), a new bridge at Pine Street and the widening of Walnut Avenue.

The Circulation Element analyzes impacts to all affected intersections and roadway segments, and specifies the needed improvements (widening, new construction, or signalization) to mitigate the impact. Please see the Appendices to the General Plan for all calculations and detailed analysis.

In addition to facility needs, the City recognizes that the construction of new facilities may result in secondary environmental effects such as traffic disruption, land use conflict and acquisition, air quality, and noise.

Mitigation: The General Plan Circulation Element specifies LOS C as the acceptable service standard for intersections and roadways during peak periods, but accepts an LOS D at specific locations. These locations include segments of 3rd Street and Walnut Avenue, based upon the maximum allowable development in the vicinity of these roadways. The City of Greenfield recognizes that areas of greater urbanization will necessitate a more realistic standard of acceptability in these specific locations as the City transitions from a rural community to a more compact urban center. Implementation of the Circulation Element will result in a roadway network that mitigates project impacts to a **less than significant** level through planning and design.

Other Traffic-Related Issues

Impact 13.2 Implementation of the General Plan will affect city-wide parking, create the need for pedestrian and bicycle facilities, and increase demands upon transit systems. These effects are considered **potentially significant**.

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The Circulation Element provides a programmatic, city-wide level of analysis. As such no specific parking impacts will occur. However, all projects that generate parking demand will be reviewed for consistency with City standards in order to meet continuing and growing parking needs, particularly with respect to new commercial projects.

As the roadway network expands, it is imperative that new development and new roadways are planned for adequate bicycle and pedestrian facilities. A lack of facilities could result in safety issues and would be contrary to the overarching goals of the General Plan to provide a safe and walkable community.

As Greenfield's population grows, it is assumed that the demand for an expanded public transit system or expansion of existing systems will grow accordingly. The City will not only need to coordinate with transit providers, but also plan for transit facilities (transit centers, bus turnouts, etc.) during the site planning process.

Mitigation: Chapter 3.0 of the General Plan, the Circulation Element, provides extensive policies that address the issues listed above. The policies and programs call for design standards that reflect the more compact urban land use pattern anticipated by the General Plan, as well as clear bicycle and pedestrian linkages between land uses to encourage non-motorized transportation. The Circulation Element specifically calls for new roadways to accommodate public transit features, and addresses public safety in and around high-volume areas such as schools. Implementation of these policies and programs over time will mitigate potential impacts to a **less than significant** level.

A LTERNATIVES

REQUIREMENT FOR ALTERNATIVES ANALYSIS

CEQA requires that a reasonable range of alternatives to the proposed project be described and considered within an EIR. The alternatives considered should represent scenarios that could feasibly attain most of the basic objectives of the project, but will avoid or substantially lessen any of the significant environmental effects. The purpose of this process is to provide decision makers and the public with a discussion of viable development options, and to document that other options to the proposal were considered during the planning process (CEQA Guidelines, §15126.6).

RELATIONSHIP TO THE PROJECT OBJECTIVES

The objectives of any project provide an important benchmark in conducting the comparative alternatives analysis and the feasibility of each. As discussed previously, an alternative is only meaningful for consideration if it can meet the basic objectives of the project as proposed.

For the Greenfield General Plan, a programmatic planning document, the “project objectives” are comprised of the Goals contained within each element of the General Plan.

RANGE OF ALTERNATIVES CONSIDERED

The City of Greenfield has considered numerous General Plan alternatives and land use scenarios since the process began in earnest in early 2002. The City had originally considered a plan that was approximately 1,800 acres larger than the currently proposed Sphere of Influence (SOI) and Planning Area, and consisted of 3,200 acres of additional land beyond the existing city limits.

After additional study, numerous workshops and presentations before LAFCO, the City settled on a combined SOI/Planning Area that adds approximately 1,380 acres to the 1,054 acres within the existing City limits, for a combined area of 2,435 acres. The size and location of the Planning Area considers natural constraints, and reflects the acreage estimated to be necessary to accommodate the City’s economic development goals, as well as sufficient land area to accommodate new housing and residents.

Once the land area needs were established (based on projected population and economic development goals), the City considered a number of land use alternatives within the general “footprint” of the currently proposed Planning Area. These alternatives, presented at a workshop on June 26, 2003, included:

- “Industrial Alternative”, that included approximately 100 acres of additional light industrial use;
- “Visitor Serving Alternative”, that included approximately 100 acres of additional AAVS land uses; and
- “Low Growth Alternative”, that reduced residential acreage by approximately 150 acres, and placed an agricultural reserve overlay on certain residential lands.

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All three of these alternatives represent subtle variations on the currently proposed General Plan concept and, in terms of comparative environmental impact, would be very similar. Although “swapping” approximately 100 acres of land uses between commercial, residential and AAVS would result in slight differences in vehicle trip generation and traffic distribution, when viewed in the context of the entire Planning Area, these differences would be so small that a detailed comparative analysis is not warranted for this section of the EIR.

In November 2004, the City Council directed staff to review another set of subtle land use alternatives in order to help the Council provide final direction for the General Plan. The changes considered addressed land use options for the northern sector of the City. In response to City Council direction, staff analyzed four additional scenarios:

- “AAVS North of Pine Avenue”;
- “All Low Density Scenario”;
- “AAVS North of Cypress Avenue”; and
- “Yanks Change Scenario”

Again, these alternatives were subtle variations on the basic land use concept being considered. A traffic analysis conducted for all four options (Higgins Associates, December 2004) confirmed that the traffic impacts from these scenarios are very similar, and that the basic roadway network and major improvements would still be required under all options. The City Council, after a series of hearings and extensive public input from the community, chose the “AAVS North of Pine Avenue” as the preferred land use option upon which to base the draft General Plan.

As the City of Greenfield has considered a number of land use scenarios as a by-product of the General Plan process, the merits of comparative discussions of those scenarios are part of the public record for the General Plan. In addition to those options, this programmatic EIR evaluates the following additional alternatives solely for the purpose of the environmental analysis pursuant to CEQA. The Alternatives considered below have been chosen for their ability to reduce one or more environmental impact as compared to the Preferred Land Use Plan.

Alternative 1 – No Project: CEQA Guidelines Section 15126.6(e)(3) requires that a “no-project” alternative be evaluated as part of an EIR, proceeding under one of two scenarios: the project site remaining in its current state or, development of the project site under its current zoning designation. Alternative 1 considers the environmental effects of not approving the proposed General Plan. In effect, this alternative would maintain the existing plan and its land uses for the next 20 years.

Comparative Analysis to the Proposed General Plan: This EIR concludes that the primary environmental impacts resulting from General Plan implementation are agricultural land conversion, traffic, increased noise levels, and increased demands upon public services.

If the City were to maintain the existing General Plan as its primary land use and policy document, all opportunities for planned and coordinated growth would be compromised. The pressure for growth would still exist, resulting in applications for annexations and Sphere of Influence Amendments in a haphazard manner. As land use patterns would be influenced by individual projects rather than the General Plan, it would be difficult for the City to foresee development patterns and establish appropriate development impact fees and plan for services accordingly.

Agricultural land would still be subject to conversion, and traffic trips (and noise) would still be generated over time. From a processing standpoint, such a piecemeal approach to city-wide planning and development would unnecessarily burden City staff and LAFCO with a series of SOI, annexation and individual development requests. Each such request outside the City's sphere would require an EIR to address agricultural land conversion and other issues. There would be no benefit from comprehensive planning.

Conversely, if the City chose to limit development to those areas within its existing SOI (a worst-case "no project" scenario), nearly all the City's economic development goals would be in jeopardy as the land area needed for new jobs and revenue-generating uses would not be available. If land was available, additional commercial uses may not be viable since population growth would be static. In addition, land values that are now steadily increasing would be artificially raised even further by the high demand and limited availability of developable property. Such a scenario would jeopardize the City's affordable housing goals as residential land becomes unattainable for affordable housing developers, as well as for the modest income levels of the average citizen of Greenfield.

Given these potential scenarios, the No Project (No General Plan Update) Alternative could result in greater environmental impact through unplanned development, and would not attain the City's stated goals and objectives as identified throughout the General Plan Update.

Alternative 2 – Lower Intensity Alternative: The intent of this alternative is to protect agricultural land by proposing a smaller Planning Area and SOI. The resulting land use plan would have the following characteristics:

- Elimination of AAVS use in the northwest sector;
- Elimination of Residential Overlay and AAVS lands west of 2nd Street and north of Walnut;
- Reduction in heavy industrial acreage in the southwest sector; and
- Replace approximately 200 acres of proposed medium-density and commercial uses to low-density residential.

A sketch of Alternative 2 is shown as **Figure 10-1**.

Comparative Analysis to the General Plan: As discussed previously, this EIR concludes that the primary environmental impacts resulting from General Plan implementation are agricultural land conversion, traffic, increased noise levels and additional demands upon public services.

In terms of agricultural land conversion, Alternative 2 would retain approximately 350 to 400 acres of important farmland by reducing the overall footprint of the Planning Area. Although agricultural land conversion would be reduced under Alternative 2, significant conversion would still be required for the remaining acreage, and the impact would remain significant and unavoidable.

In terms of traffic generation and the need for new and expanded facilities, Alternative 2 would significantly reduce traffic trip generation. As a result, some major facilities may not be needed, and Greenfield's cumulative contribution to volumes on Highway 101 would be reduced accordingly. As identified in the Circulation Element, however, all traffic impacts of the General plan can be mitigated to a less than significant level. As such, Alternative 2 would reduce traffic volumes incrementally, but would not avoid any unmitigable effects of the General Plan.

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Similarly, increased demand upon public service and utility systems would be incrementally reduced under Alternative 2. Specifically, a lower intensity general plan would anticipate a population of approximately 25,000 (rather than 36,000). Such a reduction would result in a reduced demand for water, wastewater treatment and public services such as police and fire protection. However, as all of these effects were either found to have no significant impact or could be readily mitigated to a less than significant level, both the Preferred Project and Alternative 2 would result in less than significant public service impacts.

In terms of socioeconomic effect, Alternative 2 would have difficulty meeting the economic development and jobs/housing goals of the General Plan. Both residential and nonresidential land uses are required in sufficient quantity to support a more self sufficient community and economy.

CONCLUSION

Through the General Plan process, a number of land use alternatives were explored and studied by the City of Greenfield. Most of those alternatives are variations on the preferred land use concept, and as such, would only result in modest environmental differences as compared to the proposed Planning Area. These subtle alternatives do not warrant a more detailed comparison, as it is predicted that their environmental impacts would be essentially the same as the project.

As Greenfield is a relatively small community dominated by agriculture with few other physical or natural resource constraints, there are a limited number of “alternatives”, other than those discussed here, that would effectively reduce or otherwise avoid the significant environmental impacts as compared to the proposed General Plan. For example, the community does not have hillsides or landslides to avoid, does not support significant wetlands, riparian areas or waterways, is not visually sensitive, is not served directly by rail, and is outside of the 100-year flood plain.

The Lower Intensity Alternative would reduce traffic volumes, reduce noise, reduce vehicle emissions, and create fewer demands on public services and utilities, including water demand and wastewater treatment. For these reasons, the Lower Intensity Alternative is considered the “environmentally superior alternative”. CEQA requires the identification of such an alternative as a component of the alternatives analysis.

Although the Lower Density Alternative may meet some of the basic objectives of the project while reducing the degree of some environmental impacts, this alternative has critical drawbacks. First, the land area proposed by the City is a projection of anticipated need, based on population and housing forecasts. Reducing the land area proposed would constrain the City’s ability to meet housing, affordable housing, and economic development goals of the community. Secondly, reducing the land area available for growth will artificially constrain the housing market in Greenfield, and could reverse the current positive trend of existing Greenfield residents having the ability to buy new “move up” homes or become first-time homeowners.

Both the Lower Density Alternative and the Proposed Project would require the unavoidable conversion of agricultural land.

LOWER DENSITY ALTERNATIVE.CDR (FROM LAND USE.APR) 03/04/05



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FIGURE 10-1
LOWER DENSITY ALTERNATIVE

CUMULATIVE IMPACTS

CEQA GUIDELINES

CEQA requires that an EIR contain an assessment of the cumulative impacts that could be associated with the proposed project. According to CEQA Guidelines Section 15130(a), “an EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” “Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in relation with the effects of past projects, the effects of other current projects, and the effects of probable future projects. As defined in CEQA Guidelines Section 15355, cumulative impacts refer to two or more individual effects which, when considered together, are substantial or which compound or increase other environmental impacts. A cumulative impact occurs from:

...the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

In addition, Section 15130(b) identifies that the following three elements are necessary for an adequate cumulative analysis:

- (1) Either:
 - (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
 - (B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency;
- (2) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available, and
- (3) A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project’s contribution to any significant cumulative effects.

CUMULATIVE ANALYSIS APPROACH FOR THE GREENFIELD GENERAL PLAN

In the case of a General Plan, the plan’s cumulative effects are more challenging to assess since the scale of a General Plan does not meet the standard “project” description as envisioned by CEQA. Some agencies take the approach that the General Plan’s environmental analysis is one and the same with the cumulative analysis, since the General Plan anticipates full buildout of the Planning Area and represents the ultimate “list of projects”.

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However, such an approach circumvents the primary purpose of the requirement of analyzing the combined effect of “closely related” projects. For this reason, the Greenfield General Plan is discussed in the context of its cumulative effect when considered with the closely related General Plans of neighboring communities. Specifically, this analysis includes a qualitative discussion of anticipated environmental effects of the combined planning efforts of the City of Gonzales, City of Soledad, and City of King. Using the general plans of other communities provides a more regional perspective on cumulative development impacts within the Salinas Valley.

CUMULATIVE EFFECTS

Based on the General Plans of the cities of Gonzales, Soledad, King City and Greenfield, the population of Salinas Valley south of Salinas is estimated to double during the next 20 years. Although the currently rapid growth rate of these communities (6% to 8% annually) can be expected to fluctuate and probably slow to some degree, it can be assumed, based on planning documents, that the population of the Salinas Valley has the potential to grow from approximately 65,000 to over 130,000.

Within this geographic area along the Highway 101 corridor, the following generalized cumulative impacts can be predicted. Cumulative impacts must be discussed when they are significant. Only significant cumulative effects are analyzed here.

Agricultural Resources. Growth and development within the four subject cities will lead to the irreversible conversion of important farmland, on a scale of thousands of acres. Greenfield’s General Plan will contribute to the cumulative conversion of farmland when analyzed as a regional issue. The EIR concludes that this is a significant and unavoidable consequence of future growth. The impact is considered **significant** in a cumulative context as well, when combined with the conversion rates of neighboring cities.

Air Quality. The EIR identifies a significant and unavoidable regional contribution from the General Plan to non-attainment pollutants. As a regional impact, this is also considered a **significant and unavoidable** cumulative effect, when projected Greenfield emissions are combined with the emissions of neighboring cities and agricultural activities that contribute to regional pollutants.

Biological Resources. Farmland surrounding the cities of the Salinas Valley provide foraging habitat for a number of protected species. Greenfield’s contribution to the conversion of thousands of acres of farmland will result in a secondary significant cumulative effect on a regional scale. The irreversible loss of this habitat area is also a **significant and unavoidable** consequence of regional planning and development.

Public Services and Facilities. Groundwater is the common natural resource shared by the four subject cities. The Salinas Valley aquifer is currently experiencing overdraft conditions. Although estimates of overdraft vary, increasing demand for water in the Salinas Valley is expected to exacerbate this problem. The cumulative impact to the overall groundwater supply is therefore **potentially significant**. Groundwater overdraft is considered a region-wide cumulative impact and, therefore, represents a more difficult impact to mitigate than a cumulative impact resulting from a list of specifically proposed projects. CEQA Guidelines Section 15130(c) states that, with some projects, the only feasible mitigation for cumulative impacts involves the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis. The Monterey County Water Resources Agency is currently working to implement the Salinas Valley Water

Project, which is expected to create a long-term plan for the restoration of the Salinas Valley groundwater basin. With regard to Section 15130(c), adherence to this plan by the City of Greenfield constitutes the most effective measure to address the region-wide groundwater overdraft problem. Support for this plan is reflected in the policies of the Growth Management Element of the Greenfield General Plan.

Traffic and Circulation. The General Plan Traffic and Circulation analysis appropriately analyzes General Plan buildout conditions for the Greenfield General Plan, in support of the Circulation Element. A number of improvements to bridges and interchanges within the city limits are identified as part of the General Plan's circulation system.

In a regional context, including the four subject cities and other incremental growth within Monterey County, it can be assumed that vehicle trips along the Highway 101 corridor will increase at a rate corresponding with population and housing growth, as many Salinas Valley residents commute to the workplace. Although the cumulative effect of this growth upon the Highway 101 corridor has not been quantified as part of the General Plan process, this regional issue (and Greenfield's contribution to this issue) is nonetheless identified here as **cumulative and potentially significant** for the purposes of CEQA review.

As discussed above, CEQA Guidelines Section 15130(c) states that, with some projects, the only feasible mitigation for cumulative impacts involves the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis. To that end, the goals, policies and programs contained within the Circulation Element call for regional planning, representation within regional forums, coordination with the County's transportation agencies and Caltrans, and remaining eligible for regional improvements and funding that link Greenfield with the region.

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OTHER SECTIONS REQUIRED BY CEQA

IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Requirement

Public Resources Code Section 21100(b)(2)(B) requires an Environmental Impact Report to include a statement setting forth any significant effects on the environment that would be irreversible if a project is implemented. Examples of irreversible environmental changes, as set forth in CEQA Guidelines Section 15126.2(c), include the following:

- The project would involve a large commitment of non-renewable resources such that removal or non-use thereafter is unlikely;
- The primary and secondary impacts of a project would generally commit future generations to similar uses (e.g. a highway providing access to a previously inaccessible area);
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The phasing of the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

A proposed project would result in significant irreversible effects if it is determined that key resources would be degraded or destroyed to the extent that there is little possibility of restoring them. Irreversible environmental changes should be evaluated to assure that such current consumption is justified (CEQA Guidelines Section 15126.2(c)).

ANALYSIS

The Greenfield General Plan update and resulting subsequent development would result in an increased intensity of urbanization, with the conversion of currently vacant land and agricultural land to urban use. A variety of non-renewable and limited resources would be irretrievably committed for project construction and maintenance, including, but not limited to, oil, natural gas, gasoline, lumber, sand and gravel, asphalt, steel, water, land, energy, construction materials and human resources. In addition, the project would result in an increase in demand on public services and utilities, including groundwater.

An increase in the intensity of land uses within the City's Planning Area would result in an increase in regional electric energy consumption to satisfy additional electricity demands from the project. These energy resource demands relate to initial project construction, transport of people and goods, and lighting, heating and cooling of buildings.

Development of the site to support urban uses may be regarded as a permanent and irreversible change. The site was historically used for agriculture. General Plan development would essentially eliminate agricultural production on hundreds of acres. Grading, utility extensions, drainage improvements, new and improved roadways, and construction of buildings would permanently alter the character of the site to one that is more urbanized. The project would generally commit future generations to similar urban uses on the site, since it is unlikely that the land would be reclaimed for non-urban uses once development occurs.

Please see the discussion of Significant and Unavoidable Effects and Cumulative Impacts regarding farmland conversion and cumulative water use.

GROWTH INDUCING IMPACTS

CEQA Requirement

Public Resources Code Section 21100(a)(5) requires that the growth-inducing impacts of a project be addressed in the EIR. A project may be growth-inducing if it directly or indirectly fosters economic or population growth or additional housing, removes obstacles to growth, taxes community services facilities, or encourages or facilitates other activities that cause significant environmental effects (CEQA Guidelines Section 15126.2(d)). Direct growth-inducing impacts result when the development associated with a project directly induces population growth or the construction of additional developments within the same geographic area. These impacts may impose burdens on a community or encourage new local development, thereby triggering subsequent growth-related impacts.

The analysis of potential growth-inducing impacts includes a determination of whether a project would remove physical obstacles to population growth. This often occurs with the extension of infrastructure facilities that can provide services to new development. Indirect growth-inducing impacts result from projects that serve as catalysts for future unrelated development in an area. Development of public institutions, such as colleges, and the introduction of employment opportunities within an area are examples of projects that may result in direct growth-inducing impacts.

CEQA provides no criteria for determining if induced growth is detrimental or beneficial. Induced growth is considered a significant impact only if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth could significantly affect the environment in some other way.

Analysis

As a General Plan, the project will obviously induce new growth. This is one of the objectives of the General Plan, but to do so in a planned, efficient and compact manner. General Plan implementation, based on General Plan goals, policies and programs, will result in the logical extension of utilities and services within the Planning Area boundaries. As the Planning Area establishes a firm growth area surrounded by additional important farmland, it is unlikely that development consistent with the General Plan would cause, or remove barriers to, additional direct or indirect growth outside the Planning Area. Although the General Plan does envision economic development and employment catalysts (such as business park, commercial and industrial use), it is assumed that the residential components of the plan will balance and absorb the job-based growth-inducing tendencies of these uses. As such, the growth-inducing effect of the General Plan beyond its planned growth area is predicted to be less than significant by CEQA standards.

SIGNIFICANT AND UNAVOIDABLE EFFECTS

Effects found to be significant and unavoidable as a result of General Plan implementation have been identified throughout this EIR and are listed below:

- Alteration of existing scenic resources.
- Conversion and loss of important farmland;
- Regional air quality emissions; and
- Cumulative loss of biological resource habitat.

Please see the respective sections of the EIR for more detailed discussion of these issues. Should the City Council certify the EIR and adopt the General Plan, specific findings and a Statement of Overriding Considerations would be required to weigh the relative merits of the proposal against the environmental consequences that may result.

EIR PREPARERS AND REFERENCES

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EIR REFERENCES AND SOURCE MATERIAL

<http://www.co.monterey.ca.us/court/locations.html>. Superior Court of California, County of Monterey web site. Accessed July 2004.

Ruyle, Lee-Ann. Administrative Assistant, City Manager's Department, City of Greenfield, personal communication, July 2004.

Alves, John. Deputy City Manager/Public Works Director, City of Greenfield, personal communication July 2004.

Sims, John. Fire Chief, Greenfield Fire Protection District, personal communication, July 2004.

<http://www.ci.greenfield.ca.us>. City website. Accessed July 2004.

<http://www.co.monterey.ca.us>. County website. Accessed July 2004.

<http://www.svswwa.org/report.html>. Salinas Valley Solid Waste Authority web site. Accessed July 2004.

10.0 – ENVIRONMENTAL REVIEW

City of Greenfield, *Water System Capital Improvement Plan Update*, Final Draft, December 2004

City of Greenfield, *Wastewater System Capital Improvement Plan Update*, Final Draft, December 2004

Creegan + D'Angelo, *City of Greenfield Wastewater System Capital Improvement Plan Update*, March 2000

Creegan + D'Angelo, *City of Greenfield Water System Capital Improvement Plan Update*, March 2000

City of Greenfield, *Thorp Annexation Final EIR*, September 2002

City of Greenfield, *Rava Annexation Final EIR*, June 2002

City of Greenfield, *Arroyo Seco (Creekbridge) GPA Expanded Initial Study*, October 2003

City of Gonzales, *General Plan*, 2004

City of Soledad, *General Plan*, 2004

City of King, *General Plan*, 1998

City of King, *Meyers Ranch (Arboleda) Specific Plan Final EIR*, July 2004

City of King, *Mills Ranch Specific Plan Final EIR*, February 2005

California Department of Conservation, Farmland Mapping and Monitoring Program. July 2002. *Farmland Conversion Reports 1992 to 1994, and 1996 to 1998, 1998 to 2000*. Sacramento, CA.

California Department of Conservation, Farmland Mapping and Monitoring Program. November 1994. *A Guide to the Farmland Mapping and Monitoring Program*. Sacramento, CA.

California Department of Conservation, Farmland Mapping and Monitoring Program. November 1994. *Farmland of Local Importance Definitions*. Sacramento, CA.

California Department of Conservation, Farmland Mapping and Monitoring Program. April 1993. *Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance, Monterey County*. Sacramento, CA.

Monterey County Planning Department, *County of Monterey General Plan (South and Central County Area Plan and Amendments)*

U.S. Department of Agriculture, Soil Conservation Service. April 1993. *Soil Survey of Monterey County, California*.

U.S. Department of Agriculture, Natural Resources Conservation Service. October 2001. *Storie Index for Monterey County, California*.

Final EIR
Response to Comments

Greenfield General Plan 2005-2025

Response to Comments and Final EIR

Introduction

This Final Environmental Impact Report (FEIR) is an informational document prepared by the City of Greenfield to evaluate the environmental impacts of the City's 2005-2025 General Plan Update. The primary objectives of the EIR process under the California Environmental Quality Act (CEQA) are to inform decision makers and the public about a project's potential significant environmental effects, identify possible ways to minimize significant effects and consider reasonable alternatives to the project. This EIR has been prepared in accordance with Public Resources Code (PRC) Sections 21000-21177 and the State CEQA Guidelines.

The purpose of an EIR is to identify a project's significant effects on the environment, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (PRC sec. 21002.1[a]). The Draft EIR for this project (Chapter 10 of the Draft General Plan) satisfies those requirements.

As prescribed by the State CEQA Guidelines Sections 15088 and 15132, the Lead Agency (City of Greenfield) is required to evaluate comments on environmental issues received from persons who have reviewed the Draft EIR and prepare written responses to these comments. This document, together with the Draft EIR (General Plan Chapter 10.0 as incorporated by reference in accordance with State CEQA Guidelines Section 15150) will comprise the Final Environmental Impact Report (FEIR) for this project. Pursuant to the requirements of CEQA, the City of Greenfield must certify the FEIR as complete and adequate prior to approval of the project.

This FEIR contains individual responses to each written and verbal comment received during the public review period for the DEIR. In accordance with State CEQA Guidelines Section 15088(b), the written responses describe the disposition of significant environmental issues raised.

Once the EIR is certified and all information considered, using its independent judgment, the City can take action to go forward with the preferred Project, make changes, or select an alternative to the project. While the information in the EIR does not control the City's ultimate decision, the agency must respond to each significant effect and mitigation measure identified in the EIR by making findings supporting its decision.

List of Letters Received

1. California Department of Fish and Game
2. Monterey Bay Unified Air Pollution Control District
3. LandWatch Monterey County
4. Christine Gianascol Kemp, Noland Hamerly Etienne Hoss
5. Nancy Isakson, N. Isakson Consultant, Inc.

Response to Comments

A number of responses contained in this section have resulted in minor text changes to the General Plan document. The text changes shown here will be incorporated into the final version of the General Plan once adopted.

Letter 1 – California Department of Fish and Game

DFG has reviewed the EIR and recognizes that the City of Greenfield has included habitat and wildlife goals, policies and implementation measures into the long range planning process. DFG also recommends that a “planning-area wide development approach” be taken toward protecting natural resource values. The City generally agrees with this concept, as expressed in Implementation Program 7.5D, which explores the feasibility of a city-wide habitat mitigation fee to address impacts that occur in the Planning Area over time.

The City of Greenfield appreciates DFG’s comments on the General Plan and EIR, including information regarding DFG notification pursuant to Section 1602 of the Fish and Game Code.

Letter 2 – Monterey Bay Unified Air Pollution Control District

Comment 1 – Page 10-31. The comment clarifies that population forecasts included in general plans, and not the plans and development thresholds themselves, are used to develop Air Quality Management Plans. This clarification is noted for the record.

Comment 2 – Program 8.5C. The program does reference amendments to the AQMP. Nonetheless, the text of the implementation program is amended as follows for clarification:

Program 8.5.C

Work with the Monterey Bay Unified Air Pollution Control District, and the Association of Monterey Bay Area Governments (AMBAG) and, to the extent feasible, meet federal and State air quality standards for all pollutants. To

ensure that new measures can be practically enforced in the region, participate in future amendments and updates of the ~~Monterey Bay~~ Air Quality Management Plan (AQMP) **for the Monterey Bay Region**.

Comment 3 – Diesel Exhaust. In response to this comment, Policy 8.5.4 is amended as follows:

Policy 8.5.4

New development shall be located and designed to conserve air quality and minimize direct and indirect emissions of air contaminants, **including diesel emissions**.

In addition, the end of Program 8.5.B is expanded as follows:

Program 8.5.B

Control dust and particulate matter by implementing....

In addition, the City shall address construction and operational diesel exhaust impacts in consultation with the Air District, and the need for risk assessments, when conditions warrant.

Comment 4 – Policy 8.5.3. This comment refers to a policy that demonstrates the City's desire to remain consistent with the AQMP. The EIR is conservative to conclude that buildout of the General Plan may exceed the population forecasts of the AQMP, and therefore may be significant and unavoidable. It is not the City's intent to phase development specifically based on AQMP population forecasts. However, because of the conservative "worst case maximum" buildout and population projections of the General Plan, the City will probably find, over time, that actual population growth associated with individual projects remains consistent with the projections of AMBAG and the AQMP. In addition, Policy 8.5.3 supports consistency with all other aspects of the AQMP, not just the population forecasts.

With respect to text language, the policy has been amended as follows:

Policy 8.5.3

~~Interpret and implement~~ **Implement** the General Plan to be consistent with the ~~regional Monterey Bay Unified~~ **pollution reduction goals of the** Air Quality Management Plan (AQMP) **for the Monterey Bay Region**, as periodically updated.

Comment 5 – Policy 8.5.4. Please see response to Comment 3 above.

Letter 3 – LandWatch Monterey County

(Note: Letter 3 contains a number of comments that are not comments on environmental issues, but instead relate to planning and other policy issues. CEQA requires the City only to respond to comments on the EIR and environmental issues. However, the City recognizes the relationship between the General Plan and the EIR and has responded in good faith to all comments received, including non-environmental issues).

Comment 1 – Population increase and rate of growth. The comment critiques the buildout population projected by the General Plan, as well as the rate of growth it represents. In response, it should be understood that the maximum residential buildout potential (Table 2-7, page 2-43 of the General Plan) represents a worst case, maximum buildout scenario where every acre of residential land yields maximum density and maximum household size. Based on current development patterns and unit yields in the City, this maximum scenario is unlikely to occur. For example, two recent residential projects with a maximum allowable density of 6 units per acre have developed at a density of 4 units per acre once roads, parks, open space, and/or agricultural and other easements are incorporated into the site plan. The maximum scenario does not account for these factors. As another example, the 200-foot land use buffer on the east side of the Planning Area represents approximately 24 acres of residential area that cannot be developed. This area alone would reduce the potential population figure by over 670 people. Roads, schools, local parks, regional parks, easements and landscaping are all factors that will affect the net developable acreage of the residential land use designations. Although the exact reduction net developable acreage is not and cannot be known at this time, recent projects in the City indicate that maximum residential yields (and therefore population) may be reduced by as much as 20 to 30 percent.

In terms of the rate of growth, the General Plan appropriately plans for a 20-year horizon. The City acknowledges that if full buildout would occur in this time frame, the rate would be considered “fast” and would probably outpace any State average. Such a pace would challenge the city to balance economic development and provide timely infrastructure and public services. However, the pace of growth is not inconsistent with current trends in the Salinas Valley, and may be viewed as yet another indicator that Monterey County has an unmet demand for more affordable housing and more housing choices, such as those being planned by the City of Greenfield. The letter offers no evidence that the rate of growth would itself cause any greater environmental effect beyond those effects analyzed in the EIR for full buildout of the General Plan.

Comment 2 – Agricultural Land Conversion. The City of Greenfield carefully considered the land area required to support the General Plan land uses proposed. It should be noted that large portions of the residential acreage proposed contain a

"Reserve" overlay that limits conversion until at least 80% of the non-reserve acreage is developed and permits conversion only when conversion would create a logical boundary adjustment. In addition, the hundreds of acres of the Artisan Agriculture/Visitor Serving land use serve to preserve agricultural land use in the City based on the ag-oriented allowable uses and are subject to considerable development restrictions. The City has considered the impacts of agricultural land conversion within the environmental review and through general plan policy.

Comment 3 – Density of converted lands. The comment argues that most of the land to be converted from agricultural production would be relatively "low" density residential targeted for upper income residents, thus resulting in few housing opportunities for existing residents of Greenfield.

On the contrary, of the 416 acres of residential use with the Future Growth Area, 138 acres or 33% is designated as Medium Density allowing up to 15 units per acre. Compared to other general plans in the region the City has reviewed, this is a relatively high proportion of medium density residential use. This ratio is comparable to the City of Salinas' Future Growth Area, within which 39% of new residential acreage is designated as medium or high density residential (City of Salinas General Plan, June 2002, Table LU 3).

With regard to new homeowners, the City is finding that an unexpectedly large number of new homebuyers in Greenfield are existing residents. Although not quantified at this time, there is anecdotal evidence that additional housing being constructed is providing some relief to overall household size in Greenfield, which has historically been high even by Monterey County standards, and where it is not uncommon for one residence to house more than one family (personal communication with April Wooden, Community Development Director, March 2005). The Housing Element also identifies a 20% affordable housing requirement which will further increase the availability of housing in Greenfield.

Response to Comment 4 – Fiscal Analysis. Chapter 4.0 of the General Plan, Growth Management Element, contains numerous goals, policies and programs to require new development to finance and/or construct new infrastructure facilities to keep pace with urban development. The City will also update cost recovery procedures and update fees every two years. In addition, the City's capital improvement programs for major infrastructure have recently been updated, as have transportation impact fee formulas to reflect the needs for major infrastructure such as new bridge crossings over Highway 101. Residential and non-residential impact fees in combination with policies to stimulate job growth in the City are both reflected in the General Plan. These policies will ensure that the City will be able to support future growth.

Response to Comment 5 – General Plan policies. The comment recommends additional policies to address affordable housing, infrastructure, alternative transportation and urban design. The commentor is directed to Chapters 2.0, 3.0, 4.0 and 6.0 of the General Plan, which address all the issues listed. The City of Greenfield has provided extensive design guidance in its General Plan policies, and is a local leader in the planning and implementation of affordable housing.

Response to Comment 6 – Scope of the project. The comment argues that the Draft EIR does not consider the full project or evaluation of all issues related to the proposed Sphere of Influence expansion. On the contrary, the “project” is defined by the Land Use Element, Chapter 2.0, which clearly defines the ultimate Planning Area of the City. The Draft EIR, Chapter 10.0, clearly references the Land Use Element and uses full buildout of the Planning Area within the analysis assumptions. Pages 10-55 through 10-57 include a detailed evaluation of the project relative to LAFCO policy.

Response to Comment 7 – AMBAG forecasts. The comment asks the City to consider if an ultimate population projection that conforms to AMBAG projections would eliminate potentially adverse environmental effects. In response, the City acknowledges that the maximum density calculation is higher than the AMBAG forecasts. To determine land use needs, the City also made assumptions and forecasts of their own. In doing so, the City considered the AMBAG forecasts and other available data. Please see also response to comment 1, which discusses the potential for actual net dwelling unit yield. Using a realistic factor of 25% reduction in unit yield based on recent projects in the City, the population forecast would be about 27,000, or almost identical to AMBAG forecasts. As stated previously, the General Plan and EIR take a conservative approach toward planning and analysis. Using an alternative forecast could potentially reduce the degree, but not eliminate, environmental impacts. For this reason, the Alternatives Analysis contains a Lower Intensity Alternative, which essentially accomplishes the same goal for analysis purposes.

Response to Comment 8 – Density and acreage. The comment argues that fewer acres are needed in the plan. The comment makes a gross generalization that all residential development should be medium density. A blanket density of 11.1 units per acre for the future planning area of the City would be extraordinarily high, and does not reflect a variation in residential density and housing types consistent with the City’s goals and vision. The comment also does not recognize that the General Plan contains 427 acres of AAVS use, a use intended to preserve and encourage agriculture and agriculture-related uses with minimum urban development.

Response to Comment 9 – Location and affordability of various densities. Please see response to comment 3 regarding issues of density and affordability. As indicated in Figure 2-3, the City’s core of high density residential is around the downtown area,

a planning decision to stimulate and preserve the downtown and to promote mixed-use development.

Response to Comment 10 – Circulation policies. The information on page 2-9 provides a discussion comparing traffic flows of a grid pattern versus cul-de-sacs. Page 2-9 is consistent with the comment, and states that gridded street patterns encourage pedestrian and bicycle travel. This development pattern is consistent with the City's growing trend toward traditional neighborhood design (TND) and associated street patterns.

Response to Comment 11 – Funding recommendations. The comment recommends that Greenfield allocate Local Transportation Funds (LTF) funds to Monterey Salinas Transit (MST). The policy recommendation is noted for the record.

Response to Comment 12 – Regional traffic impact fees. The comment supports the development of regional transportation impact fees. Goal 3.6 and related policies and programs call for participation in regional solutions and coordination with TAMC and Caltrans toward that end. The City will continue to review regional solutions to assess their relationship and nexus to Greenfield.

Response to Comment 13 – Population and AMBAG forecasts. Please see response to comment 7, as well as responses to Letter 2 from the Air District. With regard to the discrepancy on page 10-61, the following text is provided to clarify the EIR's conclusions:

Page 10-61, third paragraph:

...implementation of ordinances, regulations, fees, system upgrades, and conservation measures described in those chapters, physical environmental effects from increased population can be effectively reduced to a less than significant level. ***The exception is air quality where, as concluded on page 10-32, population growth and resulting air emissions may remain significant and unavoidable.***

Response to Comment 14 – Public Services and Facilities. The Public Services and Facilities section of the EIR analyzes water supply, water infrastructure, wastewater systems, police and fire infrastructure, schools, solid waste disposal and parks and recreation at a programmatic level. The impact analysis appropriately focuses on the physical environmental effects of providing additional services and infrastructure. Each subsection is analyzed independently; however, reference to Chapter 4.0 of the General Plan, Growth Management, is cited in many cases as that chapter contains specific policies regarding the funding of infrastructure, including developer financing and construction of facilities (not simply the payment of impact fees).

Response to Comment 15 – Roadway service levels and impacts. The standards of significance for LOS impacts are defined on page 10-66. An LOS standard of C except in specific locations of higher urban density is an accepted standard and approach to assess traffic impacts in a community transitioning from a rural to higher density urban setting. The City of Greenfield has the responsibility to review appropriate significance standards and performance criteria for its circulation system, and has done so in the update to the Circulation Element.

In terms of construction impacts of new facilities, page 10-67 of the EIR appropriately discloses the potential for secondary impacts. As a programmatic EIR, the City recognizes roadway projects, similar to other capital projects, public projects, or private development projects, will result in construction impacts. For that reason, construction impacts are discussed in the noise and air quality sections of the EIR. As with other future projects, the City will require more specific environmental review for specific project proposals.

Response to Comment 16 – Alternatives. The comment is correct that the comparative analysis of the alternatives would benefit from the inclusion of aesthetics and air quality, two issues that were identified as significant and unavoidable. This comparative discussion is provided below.

In terms of aesthetics, the No Project alternative would have similar or potentially worse environmental consequences compared to the proposed General Plan if piecemeal development occurred over time. This is because the No Project scenario would not benefit from planned, orderly development (which can be assumed to be aesthetically beneficial), nor would such a scenario benefit from the design guidance as contained within the General Plan. If the no project scenario maintained the existing Sphere of Influence (SOI) only, the aesthetic impact of a changing community character would not be as severe. However, as discussed on page 10-71, such a scenario is not realistic, nor would it meet any of the City's economic development and housing objectives.

Compared to the Lower Intensity alternative, aesthetic impacts would be similar. The City would still experience a level of development under this scenario sufficient to assume that the character of the community would permanently change.

In terms of air quality, the No Project alternative would have similar impacts if the SOI expanded outward on a project-by-project basis. If the plan were restricted to the existing SOI, air emissions would be decreased compared to the project, as the overall development threshold (and therefore traffic trips) would be reduced proportionately.

Compared to the project as proposed, the Lower Intensity alternative would also result in fewer emissions due to lower overall traffic volumes on the roadway system. The reduction would be proportionate to the reduction in developed acreage.

Regarding the range of alternatives considered, please see page 10-69. Page 10-72 provides a discussion of the environmentally superior alternative and the ability of the alternatives to meet the City's primary project objectives.

Response to Comment 17 – Cumulative Impact. The comment recommends quantification of cumulative transportation impacts and again recommends a regional transportation impact fee. The traffic analysis for the General Plan and EIR estimates cumulative traffic volumes for Highway 101, the main regional facility, in the vicinity of Greenfield. The analysis is based on General Plan buildout conditions, which is an appropriate basis for the cumulative impact analysis. Impacts of the project, including a series of ramp improvements to Highway 101, are included as mitigation.

For the cumulative discussion, the EIR also identifies the "four-city" area along the Highway 101 corridor in the Salinas Valley as a larger geographic scope to frame a more general impact discussion. A more expansive quantitative study of regional facility impacts and county-wide needs is the responsibility of TAMC and/or Caltrans. Nonetheless, the City recognizes, and appropriately discloses, that cumulative growth along the Highway 101 corridor is a long-term issue and represents a potential impact.

The EIR cites CEQA Guidelines Section 15130(c), which states that, with some projects, the only feasible mitigation for cumulative impacts involves the adoption of ordinances or regulations, rather than imposition of conditions on a project-by-project basis. The Greenfield General Plan is such a project, and for that reason the Circulation Element includes policies that call for regional planning, representation within regional forums, and coordination with other agencies to address regional issues and solutions.

Response to Comment 18 – Attachments. The comment letter contains copies of a number of general plan policies from one or more other communities. The City of Greenfield's General Plan was developed with the input and visioning of the community over a series of workshops and public meetings, and reflects the individuality and priorities of the City and its residents. Many of the policies and programs developed for Greenfield are similar in nature to the attachments provided in terms of new urbanism, trip reduction, and new development funding infrastructure facilities. The Housing Element was also prepared with the benefit of public input, including the input of affordable housing developers that are active in the City.

Letter 4 – Noland, Hamerly, Etienne, Hoss

Comment 1 – Yanks Air Museum Project. The comment acknowledges text drafted by the City to be incorporated into the General Plan. Regarding the location of this information in the document, it will be included in the “Special Planning Areas” section. Its inclusion under the Gateway Planning Areas subheading is appropriate since the Yanks property has been considered one of the city “gateway” locations throughout the General Plan process. The text is provided below for the benefit of the public.

Text to be added to Page 2-36:

Yanks Air Museum Project

Within the Gateway Overlay area north of Thorne Road is the planned Yanks Air Museum project. This 111-acre area has been planned for a combination of uses including an air museum, runway and hanger facilities, hotel/motel, winery with tasting room, and commercial uses including restaurants and gasoline service stations. An EIR was prepared in 1997 and the County of Monterey subsequently approved the project. The City of Greenfield applied for and Monterey County LAFCO approved a Sphere of Influence Amendment to bring the project area within the City’s SOI. This action was completed to facilitate the extension of City services (sewer and water) to the site, and to set the stage for eventual annexation of the Yanks Air Museum project into the City of Greenfield. A Memorandum of Understanding between the County of Monterey and the City of Greenfield documents the future use, vision and annexation procedures for this property.

The Yanks Air Museum project is anticipated as the primary use within this Gateway Overlay area north of Thorne Road. The General Plan (and EIR) has assumed the Yanks project within the General Plan’s development assumptions. As such, any application to construct the site as originally proposed and to annex the site into the City as originally intended would be considered consistent with the General Plan Land Use Element.

This recognition of the Yanks project is part of the City’s land use program, despite the fact that the uses proposed assume more development than would normally be allowed by the underlying AAVS land use designation.

As a Gateway Planning Area, any proposal for this location (Yanks Air Museum or other) would be subject to specific design guidelines that

require attention to aesthetics, landscaping and signage to recognize the location as an important point of entry into the City of Greenfield.

The comment letter also discusses development limitations associated with the Artisan Agriculture/Visitor Serving (AAVS) land use designation in this location. Throughout the General Plan process the City has anticipated the Yanks Air Museum project on the property north of Thorne Road. In the event the Yanks project is not implemented, the City needs to have a general plan designation for this area to set baseline land use parameters. The AAVS designation was identified as the most appropriate base land use for this area. If an alternative project and/or land use were proposed in this location (or any other location, for that matter) the project applicant would need to argue the merits of the project, the benefits to the community and how the project and/or change in land use would further other goals of the General Plan.

Letter 5 – N. Isakson Consultant, Inc.

Comment 1 – Lands between Pine Avenue and Thorne Road. A number of comments are made regarding the continued viability of existing agricultural lands in this location, and the annexation process in general.

In response, the City recognizes location of the subject property between the pending Yanks project and planned regional commercial use. The General Plan was drafted to ensure that existing agricultural operations on this land (other locations) can continue if it is the desire of the owner to do so. Commercial uses, compared to residential, are less sensitive to the effects of neighboring agricultural operations. The City does not intend to limit or impact existing agriculture, and has drafted policies to that effect. Program 7.1.D requires the City to draft and implement a right to farm ordinance to protect the continuation of agriculture, and setbacks from agriculture are the planning responsibility of the urban user, not the farm. Any specific ordinances or other land use regulations that affect property in the area will be done in the public forum, where input from the agricultural community and the public at large is welcome.

With respect to the annexation process, LAFCO has indicated a preference to review larger contiguous boundary adjustments rather than smaller, piecemealed annexations. It should be clarified, however, that annexation of property requires consent of the participating landowners in most cases.

Regarding the AAVS base land use designation, please see responses to Letter 4.



Arnold
Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

May 17, 2005

Mark McClain
City of Greenfield
45 El Camino Real
Greenfield, CA 93927

Subject: City of Greenfield General Plan EIR
SCH#: 2004061138

Dear Mark McClain:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 16, 2005, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

CITY OF GREENFIELD

MAY 20 2005

RECEIVED

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2004061138
Project Title City of Greenfield General Plan EIR
Lead Agency Greenfield, City of

Type EIR Draft EIR
Description The General Plan update provides a 20-year blueprint for the future growth of the community, providing guidance for the 2005-2025 time period.

Lead Agency Contact

Name Mark McClain
Agency City of Greenfield
Phone (831) 674-5591
email
Address 45 El Camir.o Real
City Greenfield State CA Zip 93927

Project Location

County Monterey
City Greenfield
Region
Cross Streets Entire City
Parcel No. Entire City
Township

Range

Section

Base

Proximity to:

Highways 101
Airports Yanks Air Museum
Railways
Waterways Salinas River
Schools Greenfield Union School District, King City Joint Unified SD
Land Use The current General Plan allows for a variety of land uses in the City including residential, industrial, commercial, agricultural, etc.

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wildlife

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 3; Department of Parks and Recreation; Native American Heritage Commission; Department of Health Services; Department of Housing and Community Development; Office of Emergency Services; Department of Fish and Game, Region 3; Department of Water Resources; Department of Conservation; California Highway Patrol; Caltrans, District 5; Caltrans, Division of Aeronautics

Date Received 04/01/2005 Start of Review 04/01/2005 End of Review 05/16/2005

Note: Blanks in data fields result from insufficient information provided by lead agency.



DEPARTMENT OF FISH AND GAME

http://www.dfg.ca.gov
POST OFFICE BOX 47
YOUNTVILLE, CALIFORNIA 94589
(707) 944-5500



May 4, 2005

Mr. Mark McClain
City of Greenfield
45 El Camino Real
Greenfield, CA 93927

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Dear Mr. McClain:

City of Greenfield
Draft General Plan 2005-2025 and
Environmental Impact Report
Monterey County
SCH# 2004061138

Department of Fish and Game (DFG) personnel have reviewed the City of Greenfield's Draft General Plan 2005-2025 and Draft Environmental Impact Report (DGPDEIR). Greenfield is located in Monterey County approximately 35 miles south of Salinas along the Highway 101 corridor. The predominant land use in the area is for agriculture. The Planning Area for this General Plan includes land already within City Limits, plus additional land to the east and west of the City. The incorporated City Limits include approximately 1,054 acres, while the Planning Area includes 1,380 additional acres.

Our last letter on the project in July of 2004 indicated that an analysis of potential threatened and endangered species occurrence as well as sensitive plants, animals and habitats should be included in the DEIR. For the most part, the City has addressed appropriate species likely to occur through query of the California Natural Diversity Data Base (CNDDB) and previous project correspondence with DFG and the U. S. Fish and Wildlife Service (USFWS).

Standard language has been provided in the document detailing that the City plans to address species issues on a case by case basis. The City of Greenfield is growing at a rate far in excess of the balance of Monterey County as stated in the



Mr. Mark McClain
May 4, 2005
Page 2

document. For this reason DFG recommends that the City carry out a Planning Area-wide development approach to protecting natural resource values. In this way the City or the project proponent will be less likely to be caught needing to mitigate for potential resource impacts and not having a place for such mitigation.

The California Environmental Quality Act (CEQA) requires that project impacts be mitigated to a less-than-significant level. To achieve this, avoidance is the preferred strategy. Next would be local or on-site mitigation. Last would be off-site mitigation. The City is in a position now to help project proponents plan appropriately to avoid species impacts. The DGPDEIR recognizes this fact in Section 7.0 - Conservation, Recreation, Open Space Element. On Page 7-11, Section V. Biological Resources, Goal 7.5 B states that the City will "Participate with regional, state and federal agencies and organizations to establish and preserve open space that provides habitat for local wildlife."

This is extremely important for highly mobile forms of wildlife. It becomes more difficult for animals to traverse the Salinas Valley as it becomes more developed. Page 7-13, Section VIII Open Space Resources, Goal 7.8.C expresses the desire to incorporate open space that includes wildlife habitat and provides passive recreational opportunities. This shows that the City recognizes the value and benefits of protecting our natural resources.

Finally, Section 1602 of the Fish and Game Code requires any person who proposes a project that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake or use materials from a streambed, to notify DFG before beginning the project. A Streambed Alteration Agreement (SAA) from DFG may be needed for projects within Planning Area boundaries. Project proponents can contact DFG at (707) 944-5520 for an SAA package. They may also visit the DFG website at: <http://www.dfg.ca.gov/1600> for the Notification package.

Mr. Mark McClain
May 4, 2005
Page 3

To summarize our comments: The City has provided the minimum guidance necessary in the DGPDEIR to protect natural resource concerns. Applying some extra effort now will help the City effectively deal with future mitigation needs. The City is not required to formulate such a strategy under CEQA, but DFG recommends the development of such a plan to facilitate future development goals, while protecting natural resource values.

Thank you for the opportunity to comment on this project. If you have questions, please contact Mr. Jeff Cann, Associate Wildlife Biologist, at (831) 649-7194; or Mr. Scott Wilson, Habitat Conservation Supervisor, at (707) 944-5584.

Sincerely,



Robert W. Floerke
Regional Manager
Central Coast Region

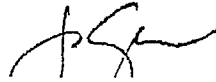
cc: State Clearinghouse

updated." The reference should be to the Air Quality Management Plan for the Monterey Bay Region. Additionally, we are not sure what this policy means. If it means that development accommodated by the General Plan would be phased to be consistent with the population forecasts in the AQMP, then the findings in the DEIR that the project would have significant and unavoidable impacts on regional air quality (ozone levels) could be changed to having less than significant project level and cumulative impacts. This, in fact, must occur based on the District's Rule 216, Wastewater Treatment Plants, which requires that such facilities serve populations consistent with the forecasts in the AQMP.

5. Policy 8.5.4. See comments in item 3 above.

Thank you for the opportunity to review the documents. Please do not hesitate to call if you have any questions.

Sincerely,



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MBUAPCD

PAGE 02/03



MONTEREY BAY

Unified Air Pollution Control District
serving Monterey, San Benito, and Santa Cruz counties

AIR POLLUTION CONTROL OFFICER
Douglas Quinn

24580 Silver Cloud Court • Monterey, California 93940 • 831/647-9411 • FAX 831/647-8501

May 16, 2005

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Santa Cruz County

Jerry Smith
Monterey County

Mark McClain
Planning Manager
City of Greenfield
P.O. Box 127
Greenfield, CA 93927

SUBJECT: DEIR FOR CITY OF GREENFIELD DRAFT GENERAL PLAN - 2005 TO 2025

Dear Mr. McClain:

Staff has reviewed the Draft General Plan which would increase the size of the City by about 1,300 acres and accommodate a population of about 36,000 persons and the DEIR has the following comments:

Draft Environmental Impact Report

1. Page 10-31. The DEIR states, "General Plans however establish the development for a City over an extended period of time and are used directly in development of the Air Quality Management Plan (AQMP), which provides the framework by which the region can meet the state ambient air quality standard for ozone." This statement should be clarified to state that the population forecasts included in general plans are used to develop the AQMP, not general plans themselves.
2. Mitigation: Policy 8.5.C. Reference is made to require the City participate in future amendments and updates of the MBUAPCD. The amendments and updates are to the AQMP, not the MBUAPCD.
3. Impact 3.3. Diesel exhaust is identified as having a potential significant impact but found less than significant because of District Rules and Regulations and General Plan Policy 8.5.4. This policy does not specifically address potential health effects of diesel exhaust from mobile source equipment during construction or operation. Since the District does not have regulatory authority over these activities, it is possible that depending on the location, time frame and amount of equipment to be used, diesel exhaust impacts could not be mitigated to less than significant. We recommend that the policy be expanded to require that the City work with the District to determine if diesel risk assessments are needed for construction activities and projects which generate operational diesel exhaust emissions and to adopt mitigation measures as needed.

Draft General Plan

4. Policy 8.5.3 states, "Interpret and implement the General Plan to be consistent with the regional Monterey Bay Unified Air Quality Management Plan (AQMP), as periodically updated." The reference should be to the Air Quality Management Plan for the Monterey Bay Region. Additionally, we are not sure what this policy means. If it means that development accommodated by the General Plan would be phased to be consistent with the population forecasts in the AQMP, then the findings in the DEIR that the project would have significant and unavoidable impacts on regional air quality (ozone levels) could be changed to having less than significant project level and cumulative impacts. This, in fact, must occur based on the District's Rule 216, Wastewater Treatment Plants, which requires that such facilities serve populations consistent with the forecasts in the AQMP.
5. Policy 8.5.4. See comments in item 3 above.

Thank you for the opportunity to review the documents. Please do not hesitate to call if you have any questions.

Sincerely,



Jean Getchell
Supervising Planner



Post Office Box 1876, Salinas, CA 93902

Email: LandWatch@mcclw.org

Website: www.landwatch.org

Telephone: 831-422-9390

FAX: 831-422-9391

May 12, 2005

The Honorable John P. Huerta, Jr., Mayor
Greenfield City Council
City of Greenfield
P.O. Box 127
Greenfield, CA 93927

[Sent By FAX To: 831-674-3149]

RE: City of Greenfield General Plan and DEIR

Dear Mayor Huerta and Council Members:

LandWatch Monterey County has reviewed the Public Review Draft of the proposed City of Greenfield General Plan 2005-2025, and the Draft Environmental Impact Report (EIR) that has been prepared on the proposed General Plan. We have the following comments:

1. The proposed General Plan indicates that the City's population at full buildout, in 2025, would be 36,000 persons. The City's current population is approximately 13,000 persons. Therefore, the proposed General Plan would increase the City's population by 23,000, an increase of 177% over the next twenty years. The result would be a City with almost *triple* the City's current population. Growth and development at this speed (a population growth rate of about 8.9% per year, on the average), would radically change the character of the community, and would have massive environmental and other effects. That projected rate of growth would make Greenfield one of the fastest growing communities in the State of California. None of the potential impacts associated with such a stupendous rate of growth are adequately explored or reviewed in the proposed General Plan, or in the accompanying Draft EIR. LandWatch believes that this kind of "big and fast growth" scenario for the City is not the best choice for Greenfield, or for the County as a whole.
2. The proposed Greenfield General Plan would unnecessarily consume large amounts of commercially productive farmland, undermining the viability of the Monterey County economy, which is based on agricultural production. LandWatch believes that this is the wrong choice for Greenfield, and for the County as a whole.
3. The proposed Greenfield General Plan would devote most of the land converted from agricultural production to relatively "low density" residential uses, providing new

housing opportunities for upper income commuters, but very few housing opportunities for persons currently living or working in Greenfield. Again, LandWatch believes that this is the wrong choice for Greenfield, and for the County as a whole.

4. The City Council should not adopt the proposed General Plan without first undertaking a fiscal analysis, showing that the City will be able to sustain, financially, the increased services that will be required to support the rapid and massive residential population growth that is the most prominent feature of that proposed General Plan. The City of Salinas, which has just ended about fifteen years of the kind of growth that would be permitted under the proposed Greenfield General Plan, has suffered extreme fiscal distress, in large part because of its failure to balance new housing construction with industrial and commercial developments. While the proposed Greenfield General Plan contains a "Growth Management Element," this Element does not include an adequate phasing or timing mechanism that would ensure that the outcome of the proposed General Plan would be any different in Greenfield. The City should look at model policies, like provisions found in the City of Marina General Plan, that phase new residential developments so that residential growth does not outpace new job growth within the City.
5. In general, the City Council should consider policies that better address the issues of affordable housing, infrastructure concurrency, alternative transportation, and urban design. Attached to this letter are examples of such policies which should be evaluated by the Council, and which must be reviewed, under CEQA, as alternatives that might better eliminate the negative environmental impacts that would be caused by adoption and implementation of the proposed Greenfield General Plan.
6. As the Council may remember, we previously commented, in a letter dated July 24, 2004, addressing the City's "Notice of Preparation," that the "project" contemplated by the City includes more than a City General Plan, it also includes a very significant expansion of the City's Sphere of Influence, and the annexation of lands to the current City limits. The Draft EIR prepared on the proposed Greenfield General Plan does not adequately address the full "project," and must consider the factors specified in the state law administered by the Local Agency Formation Commission. The Final EIR should include a full evaluation of all issues related to the proposed Sphere of Influence expansion and the proposed annexations to the City.
7. The proposed Greenfield General Plan would accommodate a population of 36,000 persons by the year 2025, approximately 8,817 persons in excess of AMBAG's 2025 population of 27,183 (extrapolated), and as indicated above, would add 22,850 persons to the current population. At buildout, the Draft General Plan would include 10,737 dwelling units.

Table 1

Existing Pop. (DOF 1/1/04)	AMBAG Forecast - 2025	GP Buildout- 2025	Existing DUs (2004 pop. estimate/4.6 2 pers/du)	Pipeline DUs (page 6-19)	New DUs needed to meet AMBAG forecasts	New DUs needed to meet GP Buildout
13,150	27,183 persons or 8,657 DUs at 3.14 pers/DU	36,000 persons or 10,737 DUs	2,846	1,250	4,561 DUs	6,641

Using Table 1 data, the proposed General Plan would allow 2,080 more dwelling units than needed to meet AMBAG's forecasts. We think that the proposed General Plan should be revised to plan for a number of dwelling units that is consistent with AMBAG's forecasts. These forecasts are used in all regional planning analyses, e.g., the Air Quality Management Plan and regional transportation plans. The Final EIR must consider whether a plan that conforms to the AMBAG projections would better eliminate potentially adverse environmental impacts.

8. The incorporated City limits currently include about 1,054 acres. The proposed Greenfield General Plan proposes annexation of about 1,380 additional acres, including the Yanks Air Museum after it has been developed. These acres are all prime agricultural land. Using an overall density of 11.1 dwelling units/acre (assumes a residential density of 11.75 DUs/acre plus 30% for roads, commercial, industrial, etc.), 410 acres would be needed to meet the AMBAG forecasts. This is almost 1,000 acres less than proposed under the proposed Greenfield General Plan. The Final EIR must analyze and examine the environmental impacts of a plan that would require an overall density of 11.1 dwelling units/acre, coupled with provisions that would conform the plan to the AMBAG projections, instead of providing for growth far in excess of those projections.
9. Table 6-41 shows that about 67% of the added acreage for new residential units would be for residential estates and low density residential (41% of new units). About 33% of added acreage would be used for medium density (1 to 15 units/acre) residential (59% of new units). No new acreage would be used for high density residential or mixed use. In 2000 (page 6-21), Greenfield's household median income was 78% of the County's household median income (\$37,606 v \$48,305). Developing 67% of new acreage to residential units that cannot be purchased by existing residents will not meet the needs of the community and will encourage new growth from people outside the region bringing with it increased inter-region commuting and its related problems.
10. The Circulation Element includes many policies which encourage bicycle, pedestrian and transit use. However, the Land Use Element (p. 2-9) states, "Neighborhoods surrounding this area, however, have a more "suburban" pattern, using cul-de-sacs and other patterns

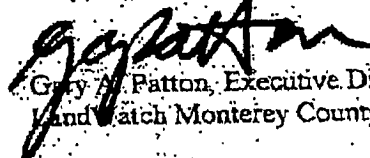
that limit "through" streets. Although cul-de-sacs diminish traffic levels in residential neighborhoods, they may discourage pedestrian and bicycle travel unless provisions are made for convenient access..." Studies show that gridded street patterns are more conducive to pedestrian and bicycle usage than streets with cul-de-sacs which tend to cut off ready access to adjacent land uses. The Final EIR must analyze an alternative street design requirement that could significantly reduce transportation impacts generated by the current proposal. In addition, LandWatch recommends that the Circulation Element address this matter more specifically, and that it identify specific ways that access could be enhanced in neighborhoods where cul-de-sacs are in fact used. A number of suggested policies are attached, for consideration by the Council, and for analysis in the Final EIR.

11. Policy 3.4.C of the Circulation Element requires the development of a strategic approach to pursue funding opportunities for public transit service. We recommend that part of this strategy include allocating Greenfield's LTF funds to transit use, similar to the City of Salinas and Monterey Peninsula cities which allocate 100% of their funds to MST.
12. Programs 4.1.A and B of the Growth Management Element provides for funding mechanisms to address traffic impacts from proposed development. We recommend that the programs support the development of regional impact fees to address impacts on regional transportation networks.
13. Page 10-60. The discussion of population growth in the Draft EIR does not address inconsistency of the Draft Plan with AMBAG's population forecasts, which are the basis of the Air Quality Management Plan for the Monterey Bay Region, the Regional Transportation Plan and the Metropolitan Transportation Plan. This section further concludes that impacts on air quality are reduced to less than significant even though the DEIR Air Quality Section finds that the impact would remain significant and unavoidable because of the inconsistency. This discrepancy must be eliminated. The implications of the inconsistency for transportation planning should be evaluated in this section as well.
14. Page 10-61. This section of the Draft EIR indicates that increased demand for public services and facilities will be paid for through development mitigation fees. Mitigation fees typically do not provide for long-term financing of operational costs, e.g., the General Plan includes policies for funding school facilities but not operational costs. The EIR/General Plan should address the impact of population growth in relationship to future city revenues and expenditures.
15. Page 10-67. The DEIR finds that the General Plan will require significant roadway improvements to maintain acceptable levels of service and that the need for these facilities as well as the environmental consequences of their construction represent a potentially significant impact. The proposed mitigation is to lower the level of service to LOS D at specific locations. This is not a mitigation measure; rather it is a change to the criteria for determining significance. Further, lowering the LOS does not address construction impacts as noted above.

16. Alternatives. Three impacts were found to be significant and unavoidable at the project level (p. 10-12): aesthetics, agricultural resources and air quality. Significant cumulative impacts (p. 10-76) were identified for agricultural resources, air quality, biological resources, public services and facilities, and traffic circulation. Two alternatives were evaluated, a "No Project Alternative" and a "Lower Intensity Alternative." In addressing the comparison of these alternatives with the proposed General Plan, the DEIR states (p. 10-70): "This EIR concludes that the primary environmental impacts resulting from General Plan implementation are agricultural land conversion, traffic, increased noise levels and increased demands upon public services [i.e., groundwater overdraft]." These findings do not include impacts on aesthetics, air quality and biological resources as identified above and include increased noise which was not identified as a significant and unavoidable impact. Thus, the Alternatives analysis does not address the relationship of each alternative to all the significant and unavoidable impacts identified in the Draft EIR. CEQA requires that alternatives addressing all significant and unavoidable impacts be identified and evaluated. We also recommend that an alternative as outlined in item 2 above be included as an alternative in a revised analysis since such an alternative would address significant air quality impacts, significantly reduce the development on farmland, encourage a more compact community and reduce traffic and decrease the demand for public services. Also, the Final EIR should address why the proposed General Plan was selected over alternatives which would reduce or eliminate impacts.
17. While the cumulative impacts analysis (page 1-77) does not quantify the impact of the General Plan on the Highway 101 corridor, the Draft EIR nevertheless finds the cumulative impact potentially significant. Moreover, it finds that mitigation measures should be undertaken on a regional level. The project's impact should be quantified, and the DEIR should include a mitigation measure requiring the City of Greenfield participate in a regional impact fee program through the Transportation Agency for Monterey County.
18. The policies contained in the attachments should be evaluated, in the Final EIR. LandWatch believes that inclusion of these policies in the Final Greenfield General Plan will significantly reduce the adverse impacts that would otherwise occur, and CEQA requires that the possible benefits of these policies be fully analyzed and evaluated.

Thank you for taking seriously these comments on the Draft EIR and the proposed Greenfield General Plan.

Very truly yours,


Gray A. Patton, Executive Director
Land Watch Monterey County

cc: Mark McClain, Planning Manager
Local Agency Formation Commission
Other Interested Persons

Attachment: Design Standards From City of Salinas General Plan

The following design standards should be considered (and analyzed in the Final EIR). These provisions are part of the currently-adopted City of Salinas General Plan. They apply to "future growth areas," like the areas proposed for annexation and development in the proposed Greenfield General Plan. Adoption and implementation of these policies by the City of Greenfield could reduce significantly the amount of land that would need to be converted, and could use the land converted more efficiently.

In connection with the environmental analysis of these provisions in the Final EIR, the Final EIR should also analyze the use of minimum density standards, to ensure the efficient use of land. This is also a technique adopted by the City of Salinas. The entire City of Salinas General Plan is available at: <http://www.ci.salinas.ca.us/CommDev/GenPlan/GenPlanFinal/GPindex.html>

Development in Future Growth Areas

Development in Future Growth Areas will be based on the principles of *New Urbanism*. This Element provides the following essential guidance for preparing Specific Plans for these areas:

- Charrettes are strongly encouraged in the early part of the process in drafting a Specific Plan to ensure effective public participation in the planning process and to insure that *New Urbanism* principles are properly employed. Charrettes will be the responsibility of the project proponent.
- New development within each future growth area shall be made up of one or more "neighborhoods." Each neighborhood shall transition from an urban neighborhood center to the edge of a collector roadway.
- Each neighborhood or group of neighborhoods within each future growth area shall provide for a mix of housing, workplaces, retail, commercial services and public/semi-public uses including schools, and shall include land designated for public parks/recreation.
- In order to preserve agricultural land, and to achieve the other benefits of compact urban design, new neighborhoods shall be required to achieve a minimum average density of 9 units per net residential developable acre, exclusive of open space, parks, schools, streets and other non-developable areas.
- New residential developments shall not achieve the required average density of 9 units per net residential developable acre through an exclusive mix of low-density and high-density units. From 35%-45% of the housing units in new residential developments shall be of housing types that fall within the range of 7-14 units per net residential developable acre.

- Residential developers shall be encouraged to design new residential developments with as many discreet lot sizes and housing types as is feasible, in the interest of offering a greater number of choices across the broad range of housing prices. Several lot sizes and housing types within each block shall be encouraged, to provide variety and texture within the block, as well as throughout each neighborhood. Clustering a large group of any single housing type in several large blocks shall be avoided.
- The street network within each Future Growth Area shall have the following characteristics:
 - a. Traffic shall be channeled from major arterials around groups of neighborhoods on collector roadways.
 - b. Collector roadways may be used to channel traffic from major arterials and collector roadways to, but not through, neighborhood commercial centers. The front setbacks shall progressively decrease as residential areas approach the neighborhood center.
 - c. Each neighborhood shall be connected in as many locations as possible to collector roadways to disburse and calm the traffic as it leaves and enters the residential neighborhood.
 - d. Open spaces, schools and parks shall be fronted by streets or public spaces, and shall not be privatized behind backyards.
 - e. "Gated" single-family home communities shall not be permitted.
 - f. Individual blocks should generally average less than 600 feet in length and less than 1,800 feet in perimeter, measured at the right-of-way line.
 - g. Cul-de-sacs shall be avoided unless natural terrain demands them.
 - h. The street network shall be thoroughly interconnected.
 - i. Streets in the neighborhood commercial center shall have parking on both sides. Head in and angle parking is preferred in the commercial center.
 - j. In order to slow traffic, standard residential streets shall be no more than 34 feet wide with parking on both sides.
 - k. Rear alleys will be considered. Rear alleys must be paved and landscaped and must be maintained by a landscape and lighting district, or comparable, permanent financing mechanism.

Attachment: Proposed Alternative Transportation Policies From The "Community General Plan"

The following policies should be reviewed in the Final EIR, since their inclusion in the Greenfield General Plan would help promote transportation alternatives, and would reduce environmental impacts. These policies are part of the "Community General Plan" now being considered by the Monterey County Board of Supervisors, as it proceeds with an update to its General Plan. The whole document is available online at the following website address:
<http://www.8of10monterey.com/pages/community/gpu/communitygpu.html>

Infrastructure – Policy #1

Alternative Transportation Strategies in Project Design – The County shall compile and maintain a list of Alternative Transportation Strategies (Strategies). This list shall include project and community design standards and techniques that have been demonstrated to be effective in achieving any of the following objectives:

- Reducing automobile use, especially single vehicle automobile trips
- Encouraging and supporting the use of transit
- Encouraging the use of bicycles and walking as an alternative mode of transportation

The list of Strategies shall be updated and revised on an annual basis. All development projects within the unincorporated areas of the County shall, to the maximum extent possible, utilize and incorporate all applicable techniques from the list of Strategies. The incorporation of these strategies into the project shall be a condition of project approval. If the County Planning Commission or the Board of Supervisors finds that a strategy on the list is not applicable to a particular project, that finding must be supported by one or more facts found in the administrative record.

Infrastructure – Policy #2

Project Review by Transit Agencies – When an application is filed for any development project within the unincorporated area, the County shall promptly provide the Transportation Agency for Monterey County (TAMC) and Monterey Salinas Transit (MST) with a copy of the plans and specifications, and shall request that these agencies recommend changes or conditions that can achieve one or more of the following objectives:

- Reduce automobile use, especially single vehicle automobile trips
- Encourage and support the use of transit
- Encouraging the use of bicycles and walking as an alternative mode of transportation

Recommendations from TAMC and MST shall be incorporated into the project, and shall be made conditions of project approval, unless, based upon substantial evidence, the County determines that the recommendations would be ineffective in achieving one or more of the above objectives, or that the benefits provided by imposing the requirement would be disproportionately small, compared to the cost or difficulty of implementing or carrying out the requirement.

Attachment: Proposed Policies That Provide For Infrastructure Concurrency From The "Community General Plan"

The policies contained in the proposed City of Greenfield General Plan do not actually require necessary transportation and other infrastructure to be in place, prior to development approval. See, for instance, Program 4.1.A on page 4.3 of the General Plan "Growth Management Element. All that is required is that "a funding mechanism and timeline has been established which will provide the infrastructure to meet the standards." In other words, promises on paper can be sufficient to justify an approval which will put real cars on the streets, and that will impose other impacts on the community.

The Final EIR should evaluate the following language from the "Community General Plan," which ties development approval to the actual provision of necessary infrastructure improvements:

Infrastructure – Policy #17

New Development Mitigation – New development projects shall mitigate any transportation impacts caused by the project. If a proposed development would cause any road segment or intersection identified in the Infrastructure Element of the General Plan to experience an unacceptable level of service, or if the development would cause additional traffic or safety impacts on any such road segment or intersection already experiencing an unacceptable level of service, the project shall not be approved. The project may be approved, despite the above, if all of the following are true:

A transportation or traffic mitigation measure is identified that will eliminate the unacceptable level of service on all affected road segments and intersections;

The installation or construction, of the transportation or traffic mitigation measure is made a condition of project approval; and

The identified transportation or mitigation measure is actually constructed prior to or concurrently with the construction of the project.

In addition, new development projects shall pay into any applicable regional or local road impact fee program.

Attachment: Proposed Policies That Provide For More Affordable Housing Opportunities From The "Community General Plan"

The following policies are contained in the "Community General Plan," and the inclusion of policies like this in the City of Greenfield General Plan would significantly increase affordable housing opportunities for local families and workers. The Final EIR should examine whether the inclusion of policies like this would help reduce or eliminate environmental impacts associated with overcrowding and the lack of adequate housing opportunities for local workers.

Housing – Policy #1

Commitment To Affordable Housing – The lack of adequate affordable housing in Monterey County has caused, and will continue to cause serious economic, public safety, social, and environmental problems. These problems constitute a community crisis, and without the policies established within this General Plan, new commercial, industrial, and residential developments will make these problems worse. The public health, safety, and welfare require that new developments within Monterey County help provide increased housing opportunities for persons who live and work in Monterey County, and particularly for those persons with very low, low, or moderate incomes.

Housing – Policy #2

Inclusionary Housing Program - The County shall adopt and implement an Inclusionary Housing Program, which will require that at least 25% of the units in any new housing project (or 25% of the new lots in any new residential subdivision) will be affordable to very low, low and moderate income households in perpetuity. The Inclusionary Housing Program shall require all new housing projects of four units or more, and all residential subdivisions of four or more new parcels, to provide affordable units or lots as part of the project. New housing projects of fewer than four units, or residential subdivisions that create fewer than four new parcels, shall be required to pay an in-lieu fee, which shall be in an amount sufficient to pay for one-fourth of the cost of creating a new housing unit, including the cost of land and construction, in the Planning Area in which the new housing unit or residential subdivision is located. This 25% Inclusionary requirement will be achieved as follows:

Very Low Income Category – 5% [Usually Rental Units]

Low Income Category – 5% [For Sale or Rental Units]

Moderate Income Category – 15% [For Sale Units]

Housing – Policy #4

Affordable Housing Defined – "Affordable housing" means those residential projects, for rent or sale, which are intended for and permanently restricted to households of very low, low, and moderate income, which meet the following qualifications:

- 1) A rental project for very low income households (income up to 50% of Housing and Urban Development (HUD) median household income for Monterey County) where the unit has a monthly contract rent less than or equal to 30% of 50% of the HUD median household income adjusted for household size; or

- 2) A rental project for low income households (income between 50% and 80% of Housing and Urban Development (HUD) median household income for Monterey County) where the unit has a monthly contract rent less than or equal to 30% of 70% of the HUD median household income adjusted for household size; or
- 3) A project for sale to low income households (income between 50% and 80% of Housing and Urban Development (HUD) median household income for Monterey County) where the units are for sale to households with incomes not more than 80% of the HUD median income for Monterey County. The average price of the unit will be based on the affordability of such a unit to a four person household earning 70% of the Monterey County median income as defined by HUD; or
- 4) A project for sale to moderate income households (income between 80% and 120% of Housing and Urban Development (HUD) median household income for Monterey County) where the units are for sale to households with incomes not more than 120% of the HUD median income for Monterey County. The average price of the unit will be based on the affordability of such a unit to a four person household earning 100% of the Monterey County median income as defined by HUD; or
- 5) Any combination of the above.

Housing – Policy #5

Equity Sharing – In order to allow very low, low, and moderate income families to achieve the greatest possible benefit from the economic advantages of homeownership, any increased equity in a for-sale affordable housing unit produced as part of the County's Inclusionary Housing Program shall be shared, upon the resale of the unit, with the very low, low, or moderate income homeowner selling the unit, so long as the unit remains permanently affordable in the same category in which it was originally sold (e.g. sale at the very low, low or moderate income level).

Housing – Policy #11

"Mixed Use" Developments To Increase Housing Opportunities – New commercial and professional office developments shall incorporate residential housing opportunities on site in a mixed use complex wherever feasible. Existing commercial and professional office developments shall be encouraged to redevelop and reconfigure uses to incorporate new residential housing opportunities. Notwithstanding this policy, the approving authority may make a finding, with respect to any specific proposed new commercial or professional office development, that it would be infeasible or inappropriate to require on site residential housing, because of the unsuitability of the area or the development for residential use; in that case, the approving authority may require equivalent residential housing to be constructed at an offsite location, or may impose an appropriate in-lieu fee.

Housing – Policy #12

New Jobs And New Housing Go Together – When newly constructed professional *office, industrial, or commercial* facilities creates 50 or more new jobs, the employers utilizing these new facilities shall be required to help provide, directly or indirectly, new, permanently affordable living quarters, sufficient to help meet the housing demand generated by the new jobs.

Housing – Policy #13

First Right To Rent or Purchase – Monterey County shall establish, maintain, and either directly administer or cause to be administered a list of persons who live in or who work in Monterey County, and who may wish to rent or purchase new housing to be constructed in the County. The County shall give written notice to persons on this list who may be eligible for such housing whenever a new housing development of five or more units is proposed, and is set for public hearing. When residential housing developments are approved within Monterey County, it shall be a condition of approval that the new residential units constructed shall first be offered for rental or sale to individuals who currently live in or work in Monterey County, and who have indicated their interest in renting or purchasing new housing constructed in the community by having their names placed upon the list maintained by the County for that purpose.

NOLAND
HAMERLY
ETIENNE
HOSS

Mark

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MAY - 6 2005
CITY OF GREENFIELD
WWW.CITYOFGREENFIELD.COM
E-MAIL CKEMP@NHEH.COM
831-424-1414 EXT. 271
OUR FILE NO. 14998.000

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May 5, 2005

VIA FACSIMILE

Mr. Mark McClain
Planning Manager
City of Greenfield
P. O. Box 127
Greenfield, CA 93927

Re: Comments on the City's General Plan/ EIR re Yanks Air Museum

Dear Mr. McClain

I am writing as a follow up to my previous testimony before the City Council regarding inclusion of the Yanks Air Museum project in the City's new General Plan.

Last evening (May 3rd), you provided me with a copy of the attached language which you indicated the City had intended, since last fall, to include in the City's General Plan. You also acknowledged that the General Plan EIR analysis includes consideration of the Yanks Air Museum Project.

I believe the proposed language is adequate to include the Yanks Air Museum in the City's General Plan. I would suggest, however, that the language be added as a Special Planning Area (at page 2-34) rather than a Gateway Overlay District as the uses allowed with the Yanks project are beyond the types of issues that would be addressed in the gateway overlay area.

My other comment relates to proposed Artisan Agricultural/Visitor Serving designation proposed for this site if the Yanks project is not built.

As I testified, the 5% site coverage and two-story - 30 foot height limitations are too restrictive. Under this designation, only 5 acres of the 100 acre Yanks site could be developed. Moreover, as you may know, Mr. Nichols has already placed three-quarters of his 400 acre property in a permanent agricultural easement, which with the 5% site coverage would effectively reduce use of the site to just 1% of the overall site.

Mr. Mark McClain
May 5, 2005
Page 2

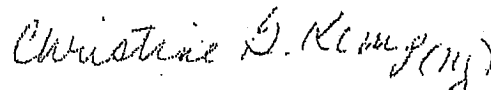
Additionally, the two story - 30 foot height limitation seems unnecessarily restrictive in that a winery, a bed and breakfast, or many other uses could well entail buildings higher than two stories and 30 feet in height.

We ask that the City Council reconsider the Artisan Ag criteria before adopting the City's General Plan.

Thank you in advance for your consideration of this matter and for including the Yanks Air Museum Project in your General Plan.

Sincerely,

NOLAND, HAMERLY, ETIENNE & HOSS
A Professional Corporation



Christine Gianascol Kemp

CGK:ng

cc: Ms. Anna Vega, City Manager
Ms. April Wooden, Community Development Director
Greenfield City Council Members
Mr. Charles Nichols
Mr. David Meyer



N. ISAKSON CONSULTANT, INC.

TRANSMITTED VIA FACSIMILE

City of Greenfield
Mr. Mark McClain, Planning Manager
P. O. Box 127
Greenfield, Ca 93927

17 May, 2005

Re: Comments on the City's General Plan

Dear Mr. McClain;

These comments are submitted in behalf of Francioni and Griva Corporation (Francioni and Griva). Francioni and Griva family are owners of agricultural lands outside the City of Greenfield west of 14th Street along the Arroyo Seco, and have farmed these lands since 1905. They also own and farm agricultural lands within the City's sphere of influence just east of highway 101 between Pine Avenue and Thorne Road (Pine/Thorne Rd. lands). These comments center on these latter referenced lands.

The City's Draft General Plan identifies the Francioni and Griva Pine/Thorne Rd lands as being within the City's sphere of influence. The City is proposing to designate these lands as Artisan Agriculture and Visitor Serving (AAVS). Francioni and Griva's Pine/Thorne Rd lands are bordered by lands to the south that will be designated Highway Commercial with an Overlay District and to the north by the Yanks Air Museum property which will be developed for commercial and visitor serving uses.

Protection of existing agricultural lands: Francioni and Griva are concerned about the impacts the above referenced developments may have on their ability to continue their agricultural operations in a manner they have historically. **They are not opposed to the proposed land use designation or the developments.** They are concerned about their ability to operate their agriculture business in a productive and efficient manner. They are concerned about the potential liability to their agricultural business from the proposed developments. Their ag lands will be sandwiched in between two commercial operations, both of which will serve large numbers of people. What impacts will be created to Francioni and Griva's agriculture business because of this type of adjacent use? How will it affect their ability to crop dust their lands and apply appropriate pesticides?

Francioni and Griva are concerned about the proposed AAVS designation, its limitations and how it is being applied. They support the comments made by Ms. Christine Kemp in her letter of May 5, 2005 regarding the AAVS criteria.

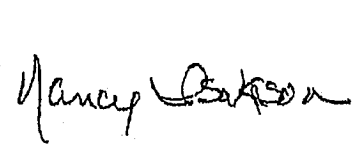
At the December 20, 2004 City Council meeting, the City's consultant stated that the City wants to annex everything within its sphere of influence as designated in the Draft General Plan, all at once. What is the impact to the landowners of the proposed annexation and what is their role in the process? Do they have a choice to be part of this annexation? What additional costs will the landowner incur because of the annexation into City boundaries?

Franscioni and Griva requests the following:

- That the City ensure appropriate buffers will be provided by the landowners of the adjacent lands and proposed new uses that will protect their agricultural lands and their ability to continue to operate as they historically have. They request they be included in the discussions and the decision-making regarding the establishment of the appropriate buffers adjacent to their lands.
- That the City work with the ag community in developing a 'Right to Farm' Ordinance that protects agricultural lands avoiding potential conflicts with adjacent development.
- That the City reconsider the Artisan Ag criteria before adopting the City's General Plan.

Franscioni and Griva thanks you in advance for your consideration of their concerns. They understand and support the City's proposed land use designation for the lands adjacent to their property. Nevertheless, they are concerned about maintaining their ability to continue to farm in a productive and efficient manner because of these proposed land use designations. In the end, another land use designation for their property may be the best use of the land because of the proposed adjacent land use designations and developments.

Sincerely,



Nancy Isakson, Consultant
For Franscioni and Griva Corporation

Cc: Ms. Anna Vega, City Manager
Ms. April Wooden, Community Development Director
Franscioni and Griva Corporation



California
Department of
Health Services

SANDRA SHEWRY
Director

State of California—Health and Human Services Agency
Department of Health Services
Northern California Drinking Water Field Operations Branch
Monterey District



ARNOLD SCHWARZENEGGER
Governor

May 24, 2005

System No. 2710008

Mark McClain
City of Greenfield
45 El Camino Real
Greenfield, CA 93927

CITY OF GREENFIELD

MAY 26 2005

RECEIVED

Draft City of Greenfield General Plan 2005-2025 EIR
State Clearinghouse No. 2004061138

Dear Mr. McClain:

The Department of Health Services, Drinking Water Field Operations Branch (Department), Monterey District office, has received and reviewed the above-cited document. Although formal comments on the EIR were due May 16, 2005, the Department offers the following comments in context with the planned water supply elements:

1. The Department concurs with evaluation of needed source and storage capacity to meet 2020 demand.
2. The plans for construction of the new well and 1.0 MG storage reservoir should be submitted to the Department for review prior to construction. A permit application must be submitted to the Department for the use of the well in the water system.
3. It is recommended that Well 2, which has been capped off due to high nitrate, be physically destroyed to prevent contamination of other aquifers.
4. Page 4-28 identifies that groundwater recharge is being considered as a means to augment the City's groundwater resources. The source of water to be recharged should be specified and an evaluation of the impacts to groundwater quality should be evaluated prior to implementation of such a plan.

Thank you for the opportunity to comment on the City's draft General Plan. If you have any questions regarding these comments, please contact me at (831) 655-6933.

Sincerely,

Betsy S. Lichti, P.E.
District Engineer, Monterey District
DRINKING WATER FIELD OPERATIONS BRANCH

DEPARTMENT OF TRANSPORTATION

50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
FAX (805) 549-3077
TDD (805) 549-3259
<http://www.dot.ca.gov/dist05/>



*Flex your power!
Be energy efficient!*

May 16, 2005

MON-101-PM 52.66/54.78
SCH# 2004061138

Mark McClain
City of Greenfield
45 El Camino Real
Greenfield, CA 93927

CITY OF GREENFIELD

MAY 20 2005

RECEIVED

Dear Mr. McClain:

COMMENTS TO: CITY OF GREENFIELD GENERAL PLAN/ENVIRONMENTAL IMPACT
REPORT

The California Department of Transportation (Department), District 5, Development Review, has reviewed the above-referenced project and offers the following comments in response to your summary of impacts on transportation facilities:

- The words "public transportation" should be included along with vehicles, bicycles and pedestrians in the text under Goal 3.1, page3-3.
- As a point of interest, under Road Classifications, El Camino Real, the city's main street is continuing to be designated as a truck route. Is the diversion of heavy trucks for goods movement along the city's main street in the best interest of the city and/or Caltrans?
- There is also no provision within the document for inter-city or inter-farm/intra-farm movement of heavy agricultural equipment. Having these machines on Route 101 impedes inter-city and inter-regional traffic. These items should be addressed in the Circulation Element.
- Under Hazardous Materials- Goal 8.4 and Air Quality – Goal 8.5, the document states that steps will be taken to keep from transporting hazardous substances and to minimize air pollutants in the City of Greenfield. Again, neither of these situations is mitigated by the designation of El Camino Real as a truck route.
- Any impacts that affect through-put of inter-regional commute and goods movement traffic on US101 must be mitigated. The Caltrans Route Concept Report for this area recommends upgrading from expressway to freeway in this portion of Segment 7.
- The natural drainage pattern for the city is from west to east. Route 101 is below the natural grade and separates the west and east sides of town. Flows from the west side of town cross over the highway in pipes on the overcrossing structures. The development resulting from the plan will increase drainage flows and could potentially impact those pipes and consequently the highway. If the pipes are overtopped, flow could be diverted from its natural course and flood both the highway and part of the southwest section of town. This situation needs to be addressed in the plan.
- Impact 8.2 (p. 10-54) recognizes the potential to increase runoff as a potentially significant impact. The mitigation for this impact refers to Goals 4.10 (p. 4-10) and 8.2 (p. 8-4). Goal

"Caltrans improves mobility across California"

Subject - Addressee

Date

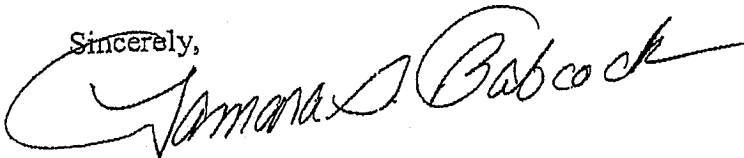
Page 2

4.10 discusses only water quality and supply, not storm flows and drainage systems. Goal 8.2 specifies that potential flooding impacts should be addressed, but it's a bit vague. The body of the mitigation text states that drainage plans must be reviewed by the City and be consistent with their policies, but this is also pretty vague. There is a discussion of drainage facilities on p. 4-33, which states that new projects are required to provide drainage infrastructure and that these facilities usually comprise on-site retention basins. This is starting to sound better, but it's still vague and it isn't actually referred to in the mitigation statement for Impact 8.2. Since the impacts will be assessed only by the City, what are the current drainage standards for the City of Greenfield? Caltrans standard is that pipes crossing our highways are designed for the 100-year flow.

- There should be a discussion in the plan of the critical nature of the drainage over Route 101. Also, the mitigation for Impact 8.2 should state that the City will ensure that increases in the 100-year flow from future development will not impact Route 101.
- Regional Cumulative Impact Fees should be consistent with the TAMC Nexus Study.

If you have any questions, or need further clarification on items discussed above, please don't hesitate to call me at (805) 549-3615.

Sincerely,



Tamara S. Babcock
District 5 Development Review Coordinator

cc: Roger Barnes (D5)
David M. Murray (D5)
John Olejnick (D5)
Lyn Wickham (D5)
Carl Hilbrants (D5)
Tim Rochte (D5)
Mark McCumsey (D5)
Andy Cook (TAMC)
File