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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 medium 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

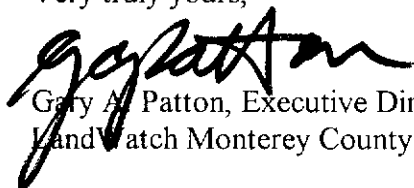
that limit “through” streets. .Although cul-de-sacs diminish traffic levels in residential neighborhoods, they may discourage pedestrian and bicycle travel unless provisions are made for convenient access...” Studies show that gridded street patterns are more conducive to pedestrian and bicycle usage 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,



Gary A. Patton, Executive Director
LandWatch 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 access 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.