



October 1, 2021

Matthew Sundt
Community Development Director
City of Gonzales
P.O. Box 647
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msundt@ci.gonzales.ca.us

Re: Vista Lucia Revised NOP; SCN 2020039056

Dear Matthew:

I write on behalf of LandWatch Monterey County to comment on the September 13, 2021 Notice of Preparation (“NOP”) of a Draft Environmental Impact Report for the Vista Lucia Project (“Project”).

LandWatch remains committed to supporting a diverse range of housing options for local working families – apartments, condominiums, townhouses, and small-lot single family homes. A broad range of options make it possible for people in the Gonzales community and greater Salinas Valley to live and work in the same community, start as renters and move up the economic ladder, and also to reduce greenhouse gas emissions and mitigate climate impacts. To be affordable to Gonzales’ local working families, which according to census data make ~ \$65,000, most of the housing will need to be multifamily and compact.

The Vista Lucia Project is one of two specific plans the City is current considering. Together, the plans are vastly oversized – twice the housing needs that AMBAG has forecast for the next 30 years. The Vista Lucia Project proposes to convert 768 acres of prime farmland to 3,500 dwelling units. It will be followed by the Puente Del Monte project that proposes to convert another 550 acres of prime farmland to 2,600 more dwelling units.

Together, the projects would convert 1,318 acres of prime farmland into 6,100 dwelling units, quadrupling the size of the City.

In this context, LandWatch has the following comments on the NOP for the Draft Environmental Impact Report for the Vista Lucia Project.

1. **Public scoping meeting.** The NOP states that there will be no public meetings to gather comments, citing COVID-19. This violates CEQA, which requires such a meeting for any project that includes more than 500 housing units. (14 CCR § 15206(b), 15082(c)(1).) The Governor’s State of Emergency Proclamation and Executive Order N25-20 did not relieve the City of public meeting obligations, but merely permitted such meetings to be held via teleconferencing, requiring the agency to make such “public meetings accessible telephonically or otherwise electronically to all members of the public seeking to attend and to address the local legislative body or state body.” (EO N-25-20, ¶ 11.) Furthermore, even that provision was suspended June 30, 2021. (EO N-08-21, ¶ 1.) LandWatch repeats its previous request for notice of this mandatory scoping meeting. (14 CCR § 15081(c)(2).)

2. **Project objectives in NOP project description.** The NOP fails to identify the Project's objectives. An NOP must include the Project description; and a statement of objectives is required as part of a project description. (14 CCR §§ 15082(a)(1)(A), 15124(b).) The objectives are critical to the formulation of alternatives. (14 CCR § 15124(b).) An important purpose of early public consultation or scoping is to identify alternatives. (14 CCR § 15083(a).) Failure to include the Project objectives in the NOP is a prejudicial error because it denies the public the opportunity to propose alternatives for evaluation in the Draft EIR that are consistent with the Project objectives. The City should reissue the NOP with the project objectives provided.
3. **Project description – project objectives in DEIR:** Without waiving objections to the failure to set forth Project objectives in the NOP, LandWatch urges the City to include the following objectives in the Project description in the draft EIR:
 - a. to provide affordable housing;
 - b. to provide housing for the existing workforce in Gonzales and vicinity;
 - c. to balance the distribution of housing sites affordable to lower and moderate income families so that it is not concentrated in a single location;
 - d. to provide housing suited for all income levels in proportion to the AMBAG Regional Housing Needs Allocation;
 - e. to avoid becoming a bedroom community to Salinas, the Monterey Peninsula, and Silicon Valley;
 - f. to discourage low density suburban development with separate or car-dependent commercial services;
 - g. to protect agricultural land and minimize urban encroachment onto farmland;
 - h. to manage GHG through compact urban form and by minimizing vehicle use;
 - i. to perpetuate a competitive development environment in which the urban growth area land is owned or controlled by a variety of interests.

These objectives are intended to fulfill express policies of the City's General Plan.

4. **Project description – description of units by affordability and tenure:** The DEIR must describe the housing units by their type (e.g., detached single family residential unit (SFR), attached SFR, town home, condominium, apartment), their projected affordability level (lower income, moderate income, workforce, market rate), and their tenure (rental or purchase) in order to support an analysis of the Project's consistency with the Housing Element and regional housing needs allocation (RHNA). The ability of the project to accommodate the City's RHNA is critical because it represents more than half of the City's planned future residential development over the next 25 years. If the project cannot accommodate its proportionate share of the City's RHNA over its projected buildout, then the City will need to annex additional land elsewhere.

The DEIR must also make a reasonable projection of the number of parcels zoned for single family residential use that will be developed as duplexes and/or lot-splits under SB 9.

5. **Phasing plan:** The Specific Plan or its DEIR must provide a phasing plan that is sufficiently detailed to support determinations whether buildout of the project's revenue producing units (e.g., residential units paying impact fees) will be enable funding of the water supply, wastewater, transportation, and drainage infrastructure required to mitigate project impacts. This will require assessment of market absorption of new units and a phasing plan for the construction of necessary infrastructure.

6. **Alternatives:** The DEIR must assess a reasonable range of alternatives focused on avoiding or reducing significant impacts. Because it is likely that the project as proposed will cause or contribute considerably to significant impacts to transportation, air quality, greenhouse gas, and agricultural resources, the alternatives evaluated should address these impacts.

First, the DEIR should evaluate a reduced scale alternative that would reduce the project size by 50%, which is closer to being consistent with actual housing needs for Gonzales over the next 25 years, particularly in light of the expected Puente Del Monte Specific Plan and approved residential development projects in Salinas and Soledad.

Second, the DEIR should evaluate an increased density alternative that would require at least 40% of the residential units to be on sites zoned for a minimum density of 20 units per acre. This will ensure that the City is in position to meet its RHNA commitments without having to annex additional territory and provide a better match of housing to available jobs.

Third, the DEIR should evaluate an alternative that combines a 50% reduction in scale with a requirement that 40% of units be zoned for a minimum 20 units per acre.

Each of these alternatives would reduce impacts to transportation, air quality, greenhouse gas, and agricultural resources.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. DeLapa". The signature is stylized with a large initial "M" and a long horizontal stroke at the end.

Michael D. DeLapa
Executive Director