FINAL EIR

Walnut Avenue Specific Plan

SCH #2012101064

PREPARED FOR

City of Greenfield

July 7, 2014

Walnut Avenue Specific Plan

Final EIR

SCH #2012101064

PREPARED FOR
City of Greenfield
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July 7, 2014

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1.0
INTRODUCTION

The City of Greenfield ("city"), acting as the lead agency, determined that the proposed Walnut Avenue Specific Plan (EMC Planning Group 2013) (hereinafter "proposed project" or "specific plan") may result in significant adverse environmental effects, as defined by the California Environmental Quality Act (CEQA) Guidelines section 15064. Therefore, the city had a draft environmental impact report (Draft EIR) prepared to evaluate the potentially significant adverse environmental impacts of the project.

The Draft EIR was circulated for public review from January 29, 2014 to March 14, 2014 and public comment was received. CEQA Guidelines section 15200 indicates that the purposes of the public review process include sharing expertise, disclosing agency analysis, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counter proposals.

This final environmental impact report (Final EIR) has been prepared to respond to public comments received during the Draft EIR public review period and to identify changes to the Draft EIR, if any, that are being made in response to public comments.

ORGANIZATION OF THE FINAL EIR

The Final EIR is organized into the following sections:

- Section 1 contains an introduction to the Final EIR.
- Section 2 contains written public comments on the Draft EIR and responses to the public comments.
- Section 3 contains changes to the Draft EIR resulting from the public comments.
- Section 4 contains administrative changes to the Draft EIR.

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2.0
COMMENTS ON THE DRAFT EIR AND RESPONSES TO COMMENTS

CEQA REQUIREMENTS

CEQA Guidelines section 15132(c) requires that the Final EIR contain a list of persons, organizations, and public agencies that have commented on the Draft EIR. A list of the correspondence received during the public review period is presented below.

CEQA Guidelines sections 15132(b) and 15132(d) require that the Final EIR contain the comments that raise significant environmental points in the review and consultation process, and written response to those comments. A copy of each correspondence received during the public review period for the Draft EIR is presented on the following pages. Numbers along the margin of each comment letter identify individual comments to which a response is provided. Responses are presented immediately following each letter. Where required, revisions have been made to the text of the Draft EIR based on the responses to comments. These revisions are included in Section 3.0, Changes to the Draft EIR.

COMMENTS ON THE DRAFT EIR AND RESPONSES TO COMMENTS

The following correspondence was received during the 45-day public review period on the Draft EIR:

1. Greenfield Fire Protection District (GFD) (February 3, 2014)
2. California Department of Conservation (DOC) (March 10, 2014)

3. Monterey County Resource Management Agency (Monterey County RMA) (March 12, 2014)

4. California Department of Transportation (Caltrans) (March 12, 2014)

5. Monterey Bay Unified Air Pollution Control District (MBUAPCD) (March 14, 2014)

The table below summarizes the topics of significant environmental points raised in each comment letter.

Table 1 Comments Submitted and Environmental Issues

	Aesthetics	**Agriculture/Forest Resources**	**Air Quality**	**Biological Resources**	**Cultural Resources**	**Geology/Soils**	**Greenhouse Gas Emissions**	**Hazards/Hazardous Materials**	**Hydrology/Water Quality**	**Mineral Resources**	**Noise**	**Public Services**	**Traffic/Circulation**	**Utilities/Service Systems**	**Cumulative Impacts**
GFD												X			
DOC		X													
MCRMA		X							X						
Caltrans													X		
MBUAPCD			X												

Source: EMC Planning Group 2014

Greenfield Fire Protection District

380 Oak Avenue Greenfield, California 93927

RECEIVED
FEB 10 2014
CITY OF GREENFIELD

Date: February 3, 2014

To: Michael Steinmann

From: Chief Foster

Subject: Draft EIR Plan for Walnut Avenue Specific Plan

The below information in the draft EIR is incorrect, I have updated and corrected.

The District currently operates one station located near the corner of Oak Avenue and 4th Street, approximately one-quarter of a mile south of the project site. The station was acquired in 1998 and according to a recent audit is listed in "good" condition (Monterey County Local Agency Formation Commission 2012). The District has two Type I engines, ~~one~~ two Type III engines, one command vehicle ~~and one patrol vehicle~~ and is staffed by three full-time ~~engineers,~~ Captains one full-time ~~firefighter~~ Engineer, ~~14 paid per-call firefighters~~, and ~~nine~~ seventeen additional volunteer firefighters. The average response time within the city is under ~~six~~ five minutes, outside the city it is seven minutes, 40 seconds. The District has recently received a fedral grant which will allow the District to hire two additional full time fire engineers. The grant will fund the positions for two years. 1

In section 7.1, fire chief name misspelled, should be Rich Foster.

1. Responses to Comments from Greenfield Fire Protection District

1-1. The GFD provided corrections to the text of Section 3.11, Public Services, of the Draft EIR. The corrections modify the GFD's current staffing levels relative to those reported in the Draft EIR.

Please see Section 3.0, Changes to the Draft EIR, for the changes. The changes do not affect conclusions reach in the Draft EIR regarding public services impacts related to fire protection services.

DEPARTMENT OF CONSERVATION

Managing California's Working Lands

DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 18-01 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-0850 • **FAX** 916 / 327-3430 • **TDD** 916 / 324-2555 • **WEBSITE** conservation.ca.gov

March 10, 2014

Via email msteinmann@ci.greenfield.ca.us
Mr. Michael A. Steinmann, Sustainability Resources Director
City of Greenfield
PO Box 127
Greenfield, CA 93927

WALNUT AVENUE SPECIFIC PLAN DRAFT EIR- SCH# 2012101064

Dear Mr. Steinman:

The Department of Conservation's (Department) Division of Land Resource Protection (Division) monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural conservation programs. The Division has reviewed the Walnut Avenue Specific Plan Draft Environmental Impact Report (EIR) and offers the following comments and recommendation with respect to the proposed project's potential impacts on agricultural land and resources.

PROJECT DESCRIPTION

The Walnut Avenue Specific Plan will guide development of up to 445,000 square feet of commercial use, 220 high-density dwelling units, and usable recreation and open space of up to approximately two acres. The Specific Plan includes land use guidance, development standards, design guidelines, a circulation plan, a public facilities and services plan, and a plan for development implementation. The location of uses and conditions under which development would proceed is intended to be flexible. A mix of commercial and residential uses is proposed to reduce vehicle trips, air emissions, and greenhouse gases. Development is anticipated to occur over a 20 year or more time horizon as future local and regional demand for commercial uses grows.

The project site is located within the City Limits of Greenfield, between Highway 101 and 3rd Street. The project site has historically been and is currently being utilized for agricultural row crop production.

DIVISION COMMENTS

Per the 2010 Important Farmland Map for Monterey County, produced by the Farmland Mapping and Monitoring Program (FMMP), the entire planning area is designated as Prime Farmland. The conversion of Prime Farmland is a material consideration for the California Environmental Quality Act (CEQA). Therefore, the Department recommends the Final EIR address the following items to provide a comprehensive discussion of potential impacts of the project on agricultural land and activities:

IMPACTS ON AGRICULTURAL LAND

Land use conversion statistics from the Important Farmland Data Availability webpage[1] document a net loss of more than 10,000 acres of Prime Farmland in Monterey County between 1984 and 2010, an annual average loss of just over 400 acres. Between 2008 and 2010 a total of 635 acres of Prime Farmland were committed to non-agricultural uses in Monterey County.

In 2010 approximately $4.01 billion in farm sales were generated in Monterey County[2], which demonstrates the productivity of available agricultural land in the region. The City of Greenfield proposes conversion of farmland that continues to be actively farmed. The loss of agricultural land represents a permanent reduction in the State's agricultural land resources-- resources which should be protected whenever feasible.

Under California Code of Regulations §15064.7, environmental impacts may quantified and qualified by use of established thresholds of significance. As such, the Division has developed the California version of the USDA Land Evaluation and Site Assessment (LESA) Model to provide lead agencies with an optional methodology for evaluating impacts on farmland. The LESA Model is available on the Division's website at:

http://www.conservation.ca.gov/dlrp/Pages/qh_lesa.aspx

MITIGATION MEASURES

Although direct conversion of agricultural land may be an unavoidable impact under CEQA analysis, mitigation measures, including compensatory mitigation, must be considered and adopted if feasible. The document declares that this impact is significant and unavoidable, a threshold that would result in a mitigation assessment. 1

The DEIR states:

> *"Future development of the project site will result in the conversion of 62.6 acres of Prime Farmland to a non-agricultural use. This is a significant and unavoidable impact of the proposed project.*

[1] http://redirect.conservation.ca.gov/dlrp/fmmp/product/page.asp
[2] California Agricultural Statistics Review 2011-2012

> *Impacts from converting Prime Farmland to non-agricultural use resulting from general plan buildout were studied in the general plan EIR...The City Council adopted a Statement of Overriding Considerations for this impact when it adopted the general plan.*
>
> *Although the city has already adopted findings and made a Statement of Overriding Considerations for the impact, a similar finding should be made for the proposed project to disclose its project-specific impact. The EIR disclosed the impact. The Statement of Overriding Considerations is a decision made by the City Council."*[3]

This implies that mitigation could not reduce the impacts to below the level of significance based on the analysis conducted for the general plan EIR. However, reduction to a level below significance is not a criterion for mitigation. Rather, the criterion is feasible mitigation that lessens a project's impacts. Pursuant to CEQA Guideline §15370, mitigation includes measures that "avoid, minimize, rectify, reduce or eliminate, or compensate" for the impact.

Therefore, all potentially feasible mitigation measures which could lessen a project's impacts should be included in the Final EIR for the Walnut Avenue Specific Plan project. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

The Department understands that various factors can affect the feasibility of potential mitigation measures. Because agricultural conservation easements have become more commonly accepted by jurisdictions at the local and state level, they are an available mitigation tool that should be considered. The Department highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA. As such, the Division recommends that the County examine whether permanent agricultural easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline §15370. **1 cont.**

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The California Council of Land Trusts (CCLT) and the California Farmland Conservancy Program (CFCP) are two sources of information on the mechanisms and fees associated with conservation easements as well as their use in mitigating for agricultural land conversion. Their web site addresses are:

http://www.calandtrusts.org
http://www.conservation.ca.gov/DLRP/CFCP/Pages/Index.aspx

The conversion of agricultural land should be deemed and impact of at least regional significance. Hence, the search for replacement lands need not be limited strictly to

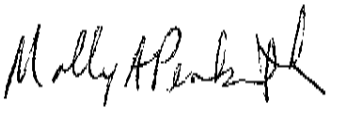
[3] Page 3-14 of the Walnut Avenue Specific Plan Draft EIR, January 13, 2014

lands within the surrounding area, but should be roughly equivalent in proximity, acreage, and agricultural characteristics to the affected property. **1 cont.**

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered. **2**

Thank you for giving us the opportunity to comment on the Draft EIR for the City of Greenfield's Walnut Avenue Specific Plan project. Please provide this Department with the date of any hearings for this particular action, and any staff reports pertaining to it. If you have questions regarding our comments, or require technical assistance or information on agricultural land conservation, please contact Heather Anderson, Environmental Planner by phone at (916)324-0869 or via email at Heather.Anderson@conservation.ca.gov.

Sincerely,



Molly A. Penberth, Manager
Division of Land Resource Protection
Conservation Program Support Unit

cc: State Clearinghouse

2. Responses to Comments from the California Department of Conservation

2-1. The commenter acknowledges the Draft EIR conclusion that conversion of agricultural land to a non-agricultural uses is a significant and unavoidable impact. The DOC states that despite this conclusion, feasible mitigation measures to lessen the impact should be considered in the Draft EIR. Conservation easements are then identified as an "available" tool that should be considered as mitigation on lands within the surrounding area.

The *City of Greenfield General Plan Environmental Impact Report* (general plan Final EIR) addresses conversion of agricultural land through policies that promote compact City form, thereby reducing the need for growth onto agricultural lands that surround the City. Neither the general plan, nor the general plan Final EIR identifies agricultural conservation easements as a mechanism to reduce impacts from conversion of agricultural land. No comments or guidance was received from DOC as part of the general plan CEQA process regarding agricultural conservation easements or other agricultural land conversion mitigation measures the DOC deemed feasible.

The project site was within the city limits at the time the general plan Final EIR was certified and the general plan adopted. The land uses identified in the general plan, including the Highway Commercial designation that applies to the project site, were planned in part to reduce impacts on agricultural land through compact growth. The proposed project is consistent with the general plan in that it implements urban development planned for the project site. Further, there are no unique agricultural resource impacts from developing the project site as proposed in the specific plan that were not already addressed in the general plan Final EIR. Therefore, the City has determined that no new mitigation from conversion of the project site to non-agricultural use is required.

The city recognizes that mitigation of agricultural land conversion impacts will be a consideration for future projects proposed on agricultural land outside the city limits which the city intends to annex in the future. This recognition is embodied in the city's "Greater Greenfield Area Memorandum of Agreement" with the Monterey County Local Agency Formation Commission, signed by the city on June 24, 2013. As part of the agreement, the city is obligated to consider preparing and adopting an agricultural land mitigation program whose provisions would apply to lands proposed for annexation by the city. The program would include agricultural conservation easements, payment of a mitigation fee for purchase of easements, and/or other mitigation mechanisms. Implementation of the program would be contingent on Monterey County and other cities in south Monterey

County adopting and implementing a similar program. The project site is already within the city and, therefore, would not be subject to the agricultural land mitigation program requirements to be identified in the Greater Greenfield Area Memorandum of Agreement.

2-2. The commenter states that other forms mitigation other than conservation easements should also be considered.

The specific plan includes policy to minimize potential land use conflicts with on-going commercial agricultural operations on properties located adjacent to the site on the north and northeast by providing buffers within the project site. Please also refer to response 2-1 above.

MONTEREY COUNTY
RESOURCE MANAGEMENT AGENCY
Benny J. Young, Director
Carl P. Holm, AICP, Deputy Director

Michael A. Rodriguez, C.B.O., Chief Building Official
Michael Novo, AICP, Director of Planning
Robert K. Murdoch, P.E., Director of Public Works

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March 12, 2014

City of Greenfield
c/o Michael A. Steinmann, Sustainable Resources Director
P.O. Box 127
Greenfield, CA 93927

Subject: Comments on Walnut Avenue Specific Plan Draft EIR (REF140018)

Dear Mr. Steinmann:

The Monterey County land use departments have reviewed the subject Draft EIR and have the following comments:

Water Resources Agency

Hydrology and Water Quality:

Groundwater Supply Conditions
The last paragraph on page 3-113 erroneously states that the Castroville Seawater Intrusion Project (CSIP) "injects recycled water into the aquifer to establish a hydraulic barrier to further seawater intrusion." CSIP does not involve aquifer injection. Rather, it treats and distributes urban wastewater and diverted Salinas River water for agricultural users in the northern Salinas Valley, thereby relieving groundwater pumping near the coast. **1**

Groundwater Quality Conditions
Page 3-114, 2nd Paragraph: Agency data indicate that nitrate concentrations are highest *not* in the Pressure 180-foot Aquifer but rather in the aquifers of the Forebay and Upper Valley. Also, in the same paragraph: Nitrate exceeds 45mg/L drinking water in nearly 40% of wells sampled throughout the Salinas Valley. The Consultant's number (30%) is not accurate. **2**

The 3rd Paragraph states that layers of clay separate upper and lower aquifer zones near the city of Greenfield. We note that while lithologic logs in the Greenfield area do record the occurrence of localized clay stringers, the aquifers of the Forebay are generally best characterized as unconfined.

Impacts, Analysis, and Mitigation Measures
Page 3-124: Existing baseline demand numbers for lettuce and broccoli/cauliflower presented in the text do not match numbers for same in Table 20. Report must contain consistent numbers for accurate evaluation of potential impacts. 3

If you have any questions regarding the comments from the Water Resouces Agency, please feel free to contact Robert Johnson at (831) 755-4860.

Agricultural Commissioner's Office

The comments below have been prepared by the Monterey County Agricultural Commissioner's Office to address the analysis for identified Agricultural Impacts in the DEIR. Overall, we agree with the analysis contained in the DEIR and offer an additional project design component that could be incorporated into the Specific Plan layout to further reduce potential impacts. The DEIR states that:

> "To promote the ability to respond to market demand for commercial and residential use, ***the specific plan is designed to be flexible in terms of the location of uses and conditions*** under which development would proceed, the siting layout for the Project is flexible (emphasis added)."

Retaining the current proposed Specific Plan layout is a critical component that directly influences the level of potential agricultural impacts created by the project. Thus, we are basing our recommendations on the current site plan layout. If the proposed layout of the Specific Plan should change in the future (e.g., if any of the residential uses are moved directly adjacent or closer to the agricultural land on or near the site), additional environmental analysis for agricultural impacts must be undertaken.

In particular, since portions of the project site are directly adjacent to active agricultural land and in fact contain fields currently in production, impacts to agricultural lands must be carefully addressed in accordance with project phasing and buildout. The specific plan defines land uses for the project site as Commercial, Residential, and Recreation and Open Space. *The residential component of the project (220 high-density dwelling units) has the most potential to create conflicts with the existing agricultural operations on and near the site. Thus, the proper siting of residential uses within the Specific Plan is critical to reducing potential project impacts to agriculture.* 4

In general, land uses as sited in the current conceptual Specific Plan layout make sense, and would reduce impacts to agriculture. A portion of the high-density residential housing would be located on the southwest side of the project site, across the street from existing housing, next to the open space/park site, and bordered by US Highway 101. However, the eastern portion of the proposed high-density housing would be located across the street from farmland and low density residential use on 3rd Street. This housing must be buffered as much as possible from this area in order to avoid land use conflicts. A landscaped buffer, such as what is shown for the proposed Highway Commercial area to the north of the residential area, would help to reduce conflicts. Mitigation should include a buffer on the eastern portion of the housing area adjacent to 3rd Street such that when combined with the built-in buffer of the road, housing is set back at least

100 feet from the land uses to the east. It also appears that this portion of the project would remove an existing stormwater detention basin that currently serves the agricultural uses on the property directly north of the proposed housing area. Depending on how the project development is phased (e.g., if the residential use is built prior to the highway commercial use), mitigation should be included that addresses stormwater runoff from the ag site if the detention basin is removed and the ag use to the north still exists. 5

If you have any questions regarding the comments from the Agricultural Commission's Office, please feel free to contact Eric Lauritzen at (831) 759-7302.

Thank you for the opportunity to review the DEIR. Monterey County has no further comments on this document.

Sincerely,

Bob Schubert

Bob Schubert, AICP
Senior Planner

3. Responses to Comments from the Monterey County Resource Management Agency

3-1. The commenter provided a correction to information on page 3-113 of the Draft EIR regarding the function of the Castroville Seawater Intrusion Project.

Please refer to Section 3.0, Changes to the Draft EIR, for corrections to the noted reference. The change does not affect the analysis included in the Draft EIR.

3-2. The commenter provided slightly different data regarding groundwater nitrate concentrations, the percentage of wells affected by nitrate contamination, and the confined/unconfined nature of local aquifers as referenced on page 3-114 of the Draft EIR.

No references to the sources of the differing data are included in the comment. The differing data is acknowledged. The new information does not affect the analysis included in the Draft EIR.

3.3. The commenter notes an inconsistency in data for baseline water demand for agricultural crops on page 3-124 of the Draft EIR.

The baseline water demand noted in Table 20 is correct. The text data noted above the table is incorrect. The data in Table 20 was used in the analysis of baseline water demand. The inconsistency does not affect the conclusions in the Draft EIR. The text data has been corrected as shown in Section 3.0, Changes to the Draft EIR.

3.4. The commenter suggests an additional on-site buffer along the 3rd Street to separate proposed on-site residential uses from existing agricultural uses on the east side of 3rd Street.

The areas on the east side of 3rd Street which the Monterey County RMA suggests are in agricultural use consist of small portions of parcels on which single-family homes that front on 3rd Street are also located. Commercial-scale agricultural production has not recently been practiced on the portions of the subject parcels that face 3rd Street. The parcels are small relative to those on which commercial-scale agriculture that can generate nuisances for residential uses (e.g. noise, dust, aerial chemical spraying, etc.) is typically practiced and is economically viable. The subject parcels are within the city limits and are designated for medium-density residential development in the general plan. The 3rd Street right-of-way is currently 60 feet wide, so the roadway currently buffers the project site from the subject parcels. For these reasons, buffers within the project site along segment of 3rd Street were not specifically designed into Figure 4, Conceptual Land Use Plan and are not deemed to be necessary. However, specific plan policy LU-9.1 does identify the need to

provide temporary buffers from agricultural uses located to the north and eastern borders of the site. The "eastern" border refers to the eastern border of the site located north of Walnut Avenue. Large scale commercial agricultural production is currently active to the north and northeastern borders of the site.

3.5. The commenter suggests that mitigation should be provided if removal of a portion of the existing on-site stormwater detention facility results in drainage impacts on existing adjacent agricultural uses.

The existing stormwater detention facility does not serve the active agricultural land uses that border the site to the north and northeast. It was originally designed to accommodate increased stormwater runoff from Walnut Avenue and 3rd Street resulting from the recent improvements to those roadways. The facility is being reduced in size due to the city's accepted change in prior assumptions about percolation rates at the project site. The city acknowledges that a higher percolation rate is acceptable. This enables a reduced facility size, even with accommodation of additional runoff from a portion of the specific plan area as proposed. Mitigation is not required.

DEPARTMENT OF TRANSPORTATION
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Flex your power!
Be energy efficient!

March 12, 2014

MON-101-53.86
SCH# 2012101064

Michael Steinmann
City of Greenfield
599 El Camino Real
Greenfield, CA 93927

Dear Mr. Steinmann:

COMMENTS TO WALNUT AVENUE SPECIFIC PLAN DRAFT EIR

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the above referenced project and offers the following comments.

1. The traffic study did not include pertinent data necessary to accurately analyze impacts and related mitigation. Caltrans requests Level of Service worksheets for the intersections, mainlines, and merge/diverge areas. This information is needed to ensure variables applied were done according to current state of practice. **1**

2. The traffic study makes use of pass-by trips, but deducts them directly from the net trip generation. This is a concern since vehicles traveling along Highway 101 will still create new trips at the interchange when their path of travel diverts to the proposed project location. In this scenario, they are not pass-by trips but rather diverted link trips. These trips can be removed from the impact analysis of Highway 101 mainline, but should be included in the interchange analyses (i.e., intersections, and merge/diverge analyses). **2**

3. Preservation of right-of-way is critical for a future interchange. Since currently the level of detail is not available for what a future Walnut interchange may look like, the 'largest scenario' footprint should be preserved. **3**

4. Because of information missing (Item #1), it was not possible to analyze pedestrian and bicycle movements across the current Walnut interchange. When provided, we will be able to determine if appropriate measures are being proposed that ensure the safe movement of these modes. This is particularly of concern with the high volume of pedestrian and bicycle traffic from the school on the West side crossing to reach a new retail attraction. **4**

5. Caltrans is encouraged by preliminary site plans that show improvements to internal circulation on the East side. It is important that the 4th Street connection to the specific plan remains a predominant feature of the development. **5**

6. It is our understanding that an interim improvement (not necessarily related to this development) is being proposed to install Stop signs on the current Walnut Interchange. The traffic analysis should clearly state that these do not create mainline issues for the north- and southbound off ramp movements. **6**

7. Regarding hydrology, on page 3-112, second paragraph under Surface Water Hydrology, there is a statement that reads: "There are no watercourses or drainage channels on the project site." Actually, there are drainage channels that currently boarder the farm fields of the project site. These channels accept cross drainage from culverts that pass under Highway 101 flowing from West to East. The development designer should be aware of this and will need to consider this drainage. No new water flow will be allowed in the State system; existing drainage patterns are to be maintained. **7**

We look forward to receiving the missing information and providing comment when received. If you have any questions, or need further clarification on items discussed above, please don't hesitate to call me at (805) 542-4751.

Sincerely,

JOHN J. OLEJNIK
Associate Transportation Planner
District 5 Development Review Coordinator

cc: Dave Rasmussen (D5 PDT)
Ben Erchul (D5 HYDRO)
Frank Boyle (D5 TRAFFIC)

4. Responses to Comments from Caltrans

4-1. The commenter requests that Level of Service worksheets be provided to enable additional Caltrans review of the traffic analysis.

As requested, the Level of Service worksheets were forwarded to Caltrans in mid-March 2014.

4-2. The commenter questions how pass-by trips were deducted from net trip generation.

The Traffic Impact Study (TIS) did use a minor trip reduction for "pass-by" trips attracted from the Walnut Avenue roadway corridor only (see Table 17 on page 26 of the TIS included as Appendix G of the Draft EIR). Trips attracted from the U.S. Highway 101 mainline were regarded as "diverted-linked" trips, and were not deducted from the net trip generation, as the comment appears to suggest. The last paragraph on page 26 of the TIS includes the following text:

> …as a regional commercial use, the proposed SP will attract pre-existing trips from the US 101 mainline corridor that would be considered "diverted-linked" trips attracted by the project site. However, such trips would still technically be considered "new" (or incremental) trips on the City's local circulation system, including Walnut Avenue ramps and overcrossing, and therefore conservatively this TIS uses no reduction for diverted-linked trips attracted from US 101 mainline corridor.

4-3. Regarding preservation of right-of-way for the future U.S. Highway 101/Walnut Avenue interchange, the commenter notes that sufficient right-of-way must be preserved.

The city completed an independent Caltrans oversight process (PSR) to study ultimate footprint needs for the U.S. Highway 101/Walnut Avenue interchange. The PSR was approved by Caltrans in February 2010. A PA&ED (PR) process was then initiated by the city that has been more recently put on-hold. The need to reserve right-of-way was clearly identified in the specific plan and right-of-way has been reserved based on the information that was available through the PSR process.

4-4. The commenter notes that analysis of movement of pedestrian/bicyclists across the current Walnut Avenue interchange cannot be completed without further Level of Service information.

The needed information has been provided to Caltrans. See response 4-1 above.

4-5. The commenter notes that Caltrans is encourage by the preliminary site plan circulation plan for its connection with 4th Street and that this feature should be maintained.

Comment noted.

4-6. The commenter asked for verification that proposed interim improvements at the U.S. Highway 101/Walnut Avenue interchange would not cause impacts on the highway mainline.

In mid-2011, the city began discussions about the scope and schedule/timeline for implementation of "interim" improvements at the Walnut Avenue interchange. This was done concurrently with the U.S. Highway 101/Walnut Avenue interchange PR process and concurrent with preparation of the TIS for the specific plan. The city's traffic engineer, Wood Rodgers, submitted a technical memorandum to Caltrans dated July 21, 2011 that documented traffic operational findings related to the interim improvements, which included all-way-stop-signs at the ramp terminal intersections. The general finding and conclusion from that analysis is that the interim improvements will not have a significant impact on U.S. Highway 101 mainline operations.

4-7. The commenter notes that there are two drainage channels on the site that boarder the farm fields that accept drainage from culverts under U.S. Highway 101, and that no new water flow will be allowed in this system.

Comment noted. The preliminary storm water collection and disposal plan for the project site does not assume use of this system to accommodate the proposed project.

MBUAPCD
Monterey Bay Unified Air Pollution Control District
Serving Monterey, San Benito, and Santa Cruz Counties

24580 Silver Cloud Court
Monterey, CA 93940
PHONE: (831) 647-9411 • FAX: (831) 647-8501

March 14, 2014

Michael A, Steinmann
Sustainability Resources Director
City of Greenfield
P.O. Box 127
Greenfield, CA 93927

SUBJECT: Walnut Avenue Specific Plan Draft Environmental Impact Report (DEIR)

Dear Mr. Steinmann:

Thank you for providing the Monterey Bay Unified Air Pollution Control District (Air District) the opportunity to comment on the above-referenced document. The Air District has reviewed the document and has the following comments.

Mobile Emissions

A significant contribution to the project's greenhouse gas emissions and fugitive PM10 emissions are mobile sources. The Air District recommends reviewing the average daily trip rate for the regional shopping center. The trip rate seems high when considered in reference to the populations of Greenfield, Gonzales, and Soledad that would be served by the project. **1**

Criteria Pollutants

The Air District reviewed the CalEEMod output in Appendix C and found that 116.03 lbs/day of ROG emissions result from hearth emissions (see page 32 of CalEEMod daily emissions output). The Air District recommends including a mitigation measure to prohibit the construction of wood-burning fireplaces or woodstoves in the proposed residential land uses to reduce this source of ROG emissions below the significance level of 137 lbs/day. **2**

Best regards,

Amy Clymo
Supervising Air Quality Planner
(831) 647-9418 ext. 227 or aclymo@mbuapcd.org

cc: David Craft, MBUAPCD Air Quality Engineer

5. Responses to Comments from the Monterey Bay Unified Air Pollution Control District

5-1. The commenter notes that the daily trip rate used to assess traffic impacts of the proposed project seems high.

The traffic generations rates used in the TIS for the project on which the traffic analysis in the Draft EIR was based were derived from the Institute of Traffic Engineers' ITE Trip Generation (8th Edition) publication. This is a common source for trip generation rates used in traffic analyses for new land use projects. The trip rate is not directly tied to the populations of local cities, but is instead tied to the project type. The project type and development capacity is based on a market study that identifies existing and future demand for retail commercial uses based on existing and future population growth in the project market area, which includes Greenfield, Gonzales, and Soledad, as well as other areas.

5-2. The recommendation is made that a mitigation measure be added to prohibit construction of wood-burning fireplaces.

The commenter notes that the CalEEMod results in Appendix C of the Draft EIR show that projected hearth-source ROG levels (from wood-burning stoves) would be about 116 pounds/day. The MBUAPCD threshold of significance is 137 pounds/per day. Because the project is not projected to exceed the threshold, mitigation in the form of policy in the specific plan or mitigation in the Draft EIR was not included. However, Implementation Measure 1 under Policy LU-11.2 in the specific plan requires that wood stoves meet or exceed Environmental Protection Agency emissions standards to ensure that ROG emission levels are minimized.

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3.0
CHANGES TO THE DRAFT EIR

This section contains text, tables, and graphics from the Draft EIR with changes indicated. Additions to the text are shown with underlines and deletions are shown with ~~strikethroughs~~.

The text on pp. 3-113 of the Draft EIR is revised as follows:

MCWRA and its co-operators, including the Monterey Regional Water Pollution Control Agency, have several major capital projects to better manage groundwater quality and reverse the long-term trend of seawater intrusion and groundwater declines in the Salinas Valley Groundwater Basin. The Castroville Seawater Intrusion Project was completed in 1998. This project treats and distributes urban wastewater and diverted Salinas River water for agricultural use in the northern Salinas Valley, thereby relieving groundwater pumping near the coast. ~~injects recycled water into the aquifer to establish a hydraulic barrier to further seawater intrusion.~~

The text on pp. 3-124 of the Draft EIR is revised as follows:

…and that two crops per year are planted and harvested. These are common row crops grown throughout the Salinas Valley. Lettuce demands approximately 1.5 ~~2.1~~ acre-feet of water per crop per acre and cauliflower/broccoli demand approximately 2.0 ~~4.0~~ acre-feet of water per crop per acre. If it assumed that half of the site is used for lettuce production and half is used for a combination of cauliflower and broccoli production, at two crops per year each (a common production cycle for such crops), total agricultural water demand would be approximately 219.2 acre-feet per year. Table 20, Existing Baseline Agricultural Water Use, presents the existing baseline water use information, consistent with the information in Table 16, Existing Agricultural Water Use.

The text on pp. 3-143 of the Draft EIR is revised as follows:

The District currently operates one station located near the corner of Oak Avenue and 4th Street, approximately one-quarter of a mile south of the project site. The station was acquired in 1998 and according to a recent audit is listed in "good" condition (Monterey County Local Agency Formation Commission 2012). The District has two Type I engines, ~~one~~ two Type II engines, one command vehicle ~~and one patrol vehicle~~ and is staffed by three full-time Captains ~~engineers~~, one full-time Engineer ~~firefighter, 14 paid per call firefighters~~, and 17 ~~nine~~ additional volunteer firefighters. The average response time within the city is under five ~~six~~ minutes, outside the city it is seven minutes, 40 seconds. The District has recently received a federal grant which will allow it to hire two additional full-time Engineers. The grant will fund the positions for two years.

4.0
ADMINISTRATIVE CHANGES TO THE DRAFT EIR

During review of the Draft EIR, the need for a correction to a mitigation measure was identified.

Mitigation measure TRANS-1 on page 3-168 of the Draft EIR requires installation of interim traffic improvements at the U.S. Highway 101/Walnut Avenue interchange that include all-way stop controls and ramp widening. Widening of the ramp approaches along with all-way stop controls would mitigate impacts of up to 220,000 square feet of commercial use within the specific plan area. However, the traffic consultant found that ramp widening was not feasible given limited turning radii (Email communication with Ravi Narayanan, Wood Rogers, October 23, 2012). As stated in the mitigation, up to 190,000 square feet of commercial development can be accommodated and mitigated solely with the all-way stop control improvements. Therefore, mitigation measure TRANS-1 has been modified to delete reference to requirements for infeasible ramp widening as shown below. Additions to the text are shown with underlines and deletions are shown with ~~strikethroughs~~.

TRANS-1. Prior to the issuance of the first building permit for development within the specific plan area, the city shall install interim all-way stop controls at the U.S. Highway 101/Walnut Avenue southbound and northbound ramps. ~~and the ramp approaches shall be widened as described in the city's TIFP.~~ The improvements will mitigate impacts of traffic volumes generated by up to 190,000 square feet of commercial use within the specific plan area, or an equivalent traffic volume resulting from a combination of commercial and/or high-density residential use. Additional development within the specific plan area is prohibited until such time as the full programmed improvements to the interchange are complete or until such time as additional traffic analysis is provided which demonstrates to the satisfaction of the city that additional development can be accommodated without exceeding city and Caltrans traffic network performance standards for this facility.

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