



January 11, 2016

Mic Steinmann
Community Services Director
City of Greenfield
599 El Camino
Greenfield, CA 93927

SUBJECT: Comments on the Notice of Preparation of a Supplemental Environmental Impact Report for the Greenfield South End Annexation Project

Mic
Dear Mr. Steinmann:

The Transportation Agency for Monterey County is the Regional Transportation Planning Agency and Congestion Management Agency for Monterey County. Transportation Agency for Monterey County (TAMC) staff has reviewed the Notice of Preparation (NOP) for the proposed Greenfield South End Annexation Project.

The project will accommodate development of 149 new low-density residential units, approximately 950,000 square feet of Highway Commercial space, and 1,659,640 square feet of Heavy Industrial space, with 50 acres of Agricultural land persevered through easement.

With respect to the changes in the project, and the ten years since the first environmental review, TAMC staff supports and appreciates the City of Greenfield's efforts in conducting a supplemental Environmental Review.

TAMC acknowledges and reaffirms the comments made in previous letters, and staff offers the following additional comments for your consideration:

Regional Road and Highway Impacts

1. To ensure the traffic study in the Draft EIR includes the information needed to analyze the impacts (both cumulative and project-specific) of this effort, it is recommended that the analysis be prepared in accordance with Caltrans' *"Guide for the Preparation of Traffic Impact Studies."* An alternative methodology that produces technically comparable results can also be used.

2. The traffic analysis should use the Association of Monterey Bay Area Governments' (AMBAG) travel demand model.
3. The traffic study should include information on existing traffic volumes within the study area, and on regional roadways, including the Highway 101. The study should be based on recent traffic volumes less than two years old. Counts older than two years cannot be used as a baseline.
4. The methodologies used to calculate the LOS should be consistent with the methods in the current version of the Highway Capacity Manual. All LOS calculations should also be included in the Draft EIR as an appendix made available for review.
5. In addition to LOS, the traffic study should consider the impacts of vehicle miles traveled (VMT) from the project. With respect to the recent passage of SB 743 and the draft updated guidelines for transportation impacts under CEQA, the project analysis should contain an analysis of what impacts the project will have on VMT.

Smart Growth Concepts

6. The SEIR should consider the project through Caltrans' Smart Mobility Framework. Since the project was first analyzed in 2006, statewide planning efforts have increasingly focused on sustainability and smart growth, including in Monterey County. TAMC's 2014 Regional Transportation Plan derives its policy guidance from the Smart Mobility Framework, and reflects the County's desire for a more sustainable transportation network. Published in 2010, the Smart Mobility Framework provides a blueprint for communities to develop efficiently and sustainably that was not available during the project's first EIR.
7. As part of the alternative analysis, the SEIR should consider a compact, in-fill alternative for the residential units. As proposed, the 149 housing units continue the "Leapfrog" development pattern seen in Greenfield, which inhibits walkability and biking, while creating bifurcated, auto-dependent neighborhoods that increase the long-term infrastructure maintenance cost for the city. With the revisiting of this project ten years after its first review, the city has a new opportunity to compare the project's long-term impacts to those of a smarter growth alternative.

Thank you for the opportunity to review this document. If you have any questions, please contact Grant Leonard of my staff at (831) 775-0903.

Sincerely,



Debra L. Hale
Executive Director

CC: John J. Olejnik, California Department of Transportation (Caltrans) District 5