

MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY



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January 11, 2016

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

Subject: NOP of a Supplemental EIR (SEIR) for the South End Annexation Project (REF150112)

Dear Mr. Steinmann,

Thank you for the opportunity to review the NOP for the South End Annexation Project SEIR. Monterey County land use departments have reviewed the NOP and have the following comments:

RMA-Planning

1. The Memorandum of Agreement (MOA) between LAFCO, the City of Greenfield and Monterey County states that "The MOA will serve as the baseline by which the City, County and LAFCO can evaluate future annexation proposals for properties included in the March 2007 Sphere of Influence amendment or in future amendments to the Greenfield Sphere of Influence." The SEIR shall address all provisions of the MOA applicable to the County including and not limited to the following:
 - **Agricultural Land Mitigation:** The Francioni parcel is under a Williamson Act contract. The MOA (p. 4) states that conservation easements have been voluntarily offered as part of the approval of the Francioni application upon cancellation [of the existing Williamson Act] through the Williamson Act Exchange Program. The cancellation/exchange of the existing contract is a "project" under CEQA and therefore the must be analyzed in the SEIR as part of the "whole of the action". Specifically, the SEIR must:
 - i. Discuss whether the lands currently under contract and those proposed as replacement are classified as Prime Farmland, Unique Farmland or Farmland of Statewide importance; the SEIR must include and analyze soils reports for the lands within the proposed easements and determine their feasibility for equivalent agricultural production;
 - ii. Analyze the impacts from the loss/conversion of agricultural lands and determine the feasibility of the proposed easements as mitigation.

- iii. Include a map of contracted Williamson Act lands in the proximity of the project site and a map with the location of the lands proposed as conservation easements;
 - iv. Address all the findings required for cancellation of the Williamson Act contract per Section 51282 of the California Government Code.
 - v. Address all other requirements of applicable State law as determined by the California Department of Conservation.
 - Agricultural Buffers: The MOA (p. 4) states that agricultural buffers will be provided where development of land within the City limits results in residential, public uses, or areas of active public congregation lying within 200 feet of land designated for agricultural use and within the unincorporated area. The MOA further states that “Areas of active public congregation” shall not include industrial uses and that buffers shall be provided as described in Exhibit E of the MOA. The SEIR must:
 - i. Describe the land uses proposed in the 121-acre parcel (Parcel 1) of the Francioni Subdivision and determine the applicability of the Interim Agricultural Buffer Policies contained in Exhibit E of the MOA.
 - ii. If an agricultural buffer is required for the Francioni Subdivision, consultation shall be required with the City and County to determine the width of the buffer consistent with the factors listed in the MOA and any other applicable policies of the Agricultural Element of the County’s General Plan.
 - iii. Describe the buffer proposed for the area of the Scheid West residential subdivision and determine consistency with the Interim Agricultural Buffer Policies contained in Exhibit E of the MOA
 - Truck Routes: The MOA (p. 5) states that the City and the County agree to mitigate truck traffic on the City through development of a truck route system as shown on Exhibit F of the MOA. The truck route appears to be an extension of Third Street aligned on the boundary between the two parcels proposed in the Francioni subdivision. The SEIR must discuss whether the subdivision of the Francioni property would be subject to any potential requirements, i.e. right-of-way dedication, for the future development of the truck route.
2. The subject project includes a minor subdivision to subdivide the Francioni parcel –which is currently located under County jurisdiction– into two parcels of 121 and 50 acres respectively. The minor subdivision will be processed by the County prior to annexation of the 121-acre parcel. The minor subdivision is subject to environmental review under CEQA and its approval would require pertaining findings. As it has been discussed, the County will use the SEIR as the basis to support the CEQA findings required for approval of the minor subdivision. As such, the SEIR must address the following:
- The SEIR must include a complete description of the subdivision including required and proposed agricultural buffer easements and road rights-of-way, water provision, septic/sewer disposal, etc.;
 - Consistency of the subdivision with applicable policies of the County’s General Plan and with the standards of the Zoning Ordinance (Title 21) and Subdivision Ordinance (Title 19), including the public road standards in Section 19.10.060.
 - Description of the source of water for the 50-acre parcel (Parcel 2) of the subdivision and consistency with any applicable requirements from the Bureau of Environmental Health.

Sheriff's Office

With this project to include construction of the following types of businesses: Travel Center, Hotel/Motel, Storage Facility; Heavy Industrial; and Highway commercial the temporary population of this area will increase.

With these types of businesses, there is the potential for increased Calls for Service (CFS) as well as other crimes and criminal activity in this area.

This based on crimes investigated in the Greenfield area by the South Monterey County Violence Suppression Collaboration, since its inception in 2015.

(This collaboration is comprised of law enforcement officers from the Monterey County Sheriff's Office, the Police Departments of Soledad, Gonzales, Greenfield; the California Department of Corrections (CDC), California State Parole, the California Highway Patrol (CHP), and the District Attorney's Office.)

In addition, the construction of Low Density Residential housing will increase the permanent population of this area. Again, with the potential for an increase in CFS and crime in the area.

The population increase, both permanent and temporary, has the potential for increased Calls for Service, reports of property crimes committed, as well as other criminal activity occurring.

There are also lower staffing levels out of the Sheriff's Office South County Station at this time.

Currently there is only a day shift working out of the substation. During day shift,(7am-5pm) there is one deputy who is assigned to cover the unincorporated areas of Greenfield (Beat 10B). That deputy is also responsible for covering the unincorporated areas of Gonzales, and Soledad.

The Swing Shift (4pm-2am) consists of one patrol unit with two deputies. That unit comes out of the Central Station in Salinas at the start of the shift. This one unit covers ALL areas of responsibility (patrolling Beats 10A, 10B, 11 and 12) for the South County Station. This includes the unincorporated areas north of Chualar to the San Luis Obispo and Fresno county lines.

The Midnight Shift (9pm-7am) does not have an assigned unit to patrol the South County area. A two- deputy unit from the Central Station in Salinas (Which stays centralized for response) is dispatched as needed to any Calls for Service that come in.

Based on all these factors, this project would have a **Potentially Significant impact** on Public Safety.

Thank you again for the opportunity to comment on the NOP.

Sincerely,



Robert Schubert, AICP
Senior Planner

