

# Appendix B

## *DRAFT Conformance with LAFCO Policy*

### **Conformance with the 2013 Greater Greenfield Area Memorandum of Agreement (MOA)**

The following information demonstrates the project’s conformance with LAFCO Resolution No. 13-13, establishing the City/County/LAFCO MOA:

Policy Summary	Project Conformance Analysis
Long Term Direction of City Growth	The project is located within the adopted SOI, consistent with MOA Exhibits “A”, “B”, and “C”.
Agricultural Land Mitigation	<p>The City has not yet adopted an agricultural land mitigation program, and therefore the project is subject to the mitigation requirements of the MOA. This requirement is reflected in MM 3.2-3 of the SEIR, which requires that the applicant comply with the requirements set forth in the Department of Conservation Williamson Act Easement Exchange Program (WAEPP) agreement, as well as the acquisition of an additional permanent agricultural easement at a minimum 1:1 ratio of acres converted to compensate for the additional Scheid Lands. This requirement conforms to the MOA. The project has identified specific properties to mitigate for both the conversion of agricultural land under CEQA, <u>and</u> to mitigate for the exchange of land under Williamson Act protection. The ratio of mitigated agricultural land to converted agricultural land is more than 2:1 for the Franscioni property, and a minimum of 1:1 for other (non-WA contract) land.</p>
Agricultural Buffers	<p>Neither a permanent or interim County-wide program providing guidance for buffers currently exists. The project is therefore subject to the remaining Interim Agricultural Buffer Policies (Exhibit E) of the MOA. The City of Greenfield has prepared a draft Interim Ag Buffer Program that requires consultation with the Monterey County Agricultural Commissioner’s Office on a case by case basis.</p> <p>As stated in Exhibit E, in all areas outside of permanent buffer areas proposed for urban growth, the urban/agricultural interface will be governed by the City’s General Plan Policy 2.1.12, which states that “<i>Where differing land uses abut one another, [the City shall] promote land use compatibility with buffering techniques such as landscaping, setbacks, screening and, where necessary construction of soundwalls.</i>”</p> <p>The project has the following adjacent uses:</p> <p><u>South</u>: Active agriculture.</p> <p><u>East</u>: Active agriculture.</p> <p><u>West</u>: Active agriculture, Highway right-of-way, and existing residential.</p> <p><u>North</u>: Existing Middle school, High School, commercial and industrial uses.</p> <p>The proposed Scheid West residential site plan includes a 70-foot temporary Agriculture Buffer along the western portion of the property. Along the southern property line is proposed a 200-foot long term agricultural buffer. This buffer includes a 40-foot building setback from the roadway, a 90-foot right-of-way, 50-feet of storm water detention and 20 feet of agricultural road. These treatments comply with City policy 2.1.12 and therefore the MOA.</p> <p>The Scheid East Industrial, Scheid East, Franscioni and L.A. Hearne properties are designated for Highway Commercial and Heavy Industrial uses and are adjacent to agricultural properties. Highway Commercial and Industrial uses are compatible</p>

Policy Summary	Project Conformance Analysis
	with agricultural uses and do not require buffering. However, the project description includes a voluntary 70 foot easement along these property boundaries that will be recorded with annexation.
Efficient Urban Development Patterns	The City's General Plan includes the goals, policies and objectives that LAFCO is required to consider. These goals, policies and objectives include the following: Policy 2.1.6, Policy 2.1.9, Policy 2.1.14, Policy 2.2.3, Policy 2.2.4, Policy 2.3.6, and Program 2.8.A. These policies promote efficient urban development patterns, and the project's location is consistent with the development pattern envisioned in the General Plan. The land use plan considered the location and direction of growth to concentrate most development near the city center.
Regional Traffic Needs	The City's General Plan includes goals, policies and objectives that LAFCO is required to consider. These goals, policies and objectives include the following: Policy 3.6.2, Policy 3.6.3, and Program 3.6.B. The project applicant is required to pay the City's traffic impact fee, as well as any applicable regional (TAMC) transportation impact fees that are in effect. Payment of fees is consistent with the MOA's mitigation strategy for roadway impacts.
Truck Routes	<p>The City and County have agreed to mitigate the impact of truck traffic on the City of Greenfield through the development of a truck route system (Exhibit F of the MOA). The City's General Plan includes goals, policies and objectives that LAFCO is required to consider, and Policy 3.2.5 addresses truck routes for large capacity trucking.</p> <p>Espinosa Road, located along the south side of the L.A Hearne parcel and the Franscioni parcel, is identified by the MOA as Potential Alternative Route. The land uses of the South End Annexation would primarily use Espinosa Road as the highway access point. The Scheid East and Scheid East Industrial parcels could access Third Street via Espinosa Road, consistent with the planned and alternative routes identified in the MOA.</p>
Regional Housing Needs	<p>The City and the County agree to support each other's efforts to meet the jurisdiction's Fair Share Housing Allocation as approved by the Association of Monterey Bay Area Governments.</p> <p>Per the City's municipal code, the Scheid West parcel (Vines Subdivision) will be required to have 10% of the units as Moderate-Income units and 10% of the units as Low-Income units. Any fraction of units will either be required to be constructed as a Very-Low Income unit or pay the difference in the form of an affordable housing fee.</p>
Public Services and Facilities	The City's General Plan contains numerous policies to ensure that adequate public services and facilities exist to serve new developments and that new development does not adversely impact the provision of public services and facilities to the existing city. These policies include: Program 2.1.C, Program 2.1.D, Program 2.1.E, Program 2.1.F, Policy 3.2.2, Policy 3.2.3, Policy 3.2.4, Policy 3.2.5 Program 3.2.C, Program 3.2.D, Program 3.2.F and Program 3.2.G. The project is subject to the City's development impact fees and required to provide adequate services and infrastructure.
City/County Relations	The MOA is an example of City/County cooperation and relations. At this time a formal committee has not yet been formed.
Intergovernmental Cooperation	The MOA is an example of intergovernmental cooperation and relations. At this time a formal committee and management council has not yet been formed.

## Conformance with LAFCO Policies and Procedures Document, February 2013

A summary of LAFCO policy relevant to CEQA and an analysis of the proposed project vis-à-vis this policy is presented in the table below.

### LAFCO POLICY AND PROCEDURES ANALYSIS

Policy Summary	Discussion
<b><i>Determination of Boundaries</i></b>	
Definite and certain maps must be files as part of an application for boundary change.	The proposed project incorporates maps and written and legal descriptions as part of the application. The maps will be finalized prior to the official application to LAFCO.
Boundaries should follow existing political boundaries and natural or man-made features.	The proposed project will expand the existing political boundary of the City of Greenfield. The project will expand the municipal boundary south over the existing man-made feature of Elm Avenue. The expansion of the municipal boundary was anticipated in the 2007 Urban Services Area and Sphere of Influence
Boundaries should not be drawn so as to create an island, corridor or strip either within the proposed territory or immediately adjacent to it.	The proposed project would create a logical expansion of the city south along both sides of Highway 101. The properties were included in the 2007 expansion of the Urban Service Area and Sphere of Influence No islands are created by the proposed action.
Boundary lines of an area proposed to be annexed to cities and/or districts shall be located so that all streets and rights-of-way will be placed within the same jurisdiction as the properties which abut thereon.	The proposed project will locate all streets and right-of-ways within the jurisdiction of the City of Greenfield, including US 101, Espinosa Road and local streets.
The creation of boundaries that divide assessment parcels should be avoided whenever possible.	The Francioni property will undergo a minor subdivision so that the 50 acres that will remain in agricultural use, under an Agricultural Conservation Easement, as a stand-alone parcel. This subdivision will occur for the sole purpose of implementing agricultural protection and mitigation.
Boundaries should avoid dividing an existing identifiable community, commercial district, or any other area having social or economic homogeneity.	The project will not divide any communities or commercial districts. The surrounding agriculture uses while economically homogeneous would not be divided or significantly impacted by this development.
Guidelines relating to road right-of-way.	<p>The proposed project will required the annexation of that portion of Camino Real that runs parallel to Highway 101, until it reaches the intersection with Susan Lane.</p> <p>The proposed project will also require the annexation of Espinosa Road along the southern boundary of adjacent to the Francioni and L.A Hearne properties.</p> <p>The Scheid West and NH3 parcels will be accessed from El Camino Real. Interior roads on the Scheid West parcel will be stubbed to surrounding properties.</p> <p>The Scheid East Industrial, Scheid East, Francioni,</p>

Policy Summary	Discussion
	and L.A. Hearne parcels will be accessed from Third Street on the north, Highway 101 on the west and Espinosa Road on the south. Interior roads will direct traffic internal to the parcels.
City and related district boundaries should occur concurrently to avoid irregular to avoid an irregular pattern of boundaries.	All City and District boundaries remain intact and no irregular boundaries are created.
<b><i>Duplication of Authority to Perform Similar Functions</i></b>	
Proposal should minimize the number of local agencies and promote the use of multi-purpose agencies.	The proposed project will not necessitate the formation of any new local agencies or districts.
The effect of the approval of a proposal which would result in two or more districts or a city and a district possessing any common territory, the authority to perform the same or similar functions shall be considered by LAFCO.	The proposed project would not result in the overlap of municipal and district services, services that were being provided by the County would discontinue upon annexation of the property to the City. The City would provide services to the project site after annexation.
<b><i>Conformance with City or County General and Specific Plans</i></b>	
The proposal should be consistent with the appropriate city or county general and specific plans.	The proposed project, with incorporation of mitigation measures included in this document, would be consistent with the <i>Greenfield General Plan (2005)</i> . The project is also consistent with the County's General Plan land use map.
<b><i>Conformance with Spheres of Influence</i></b>	
The proposal shall be consistent with the Sphere of Influence (SOI) for the local agencies.	The project site is located entirely within the City's SOI and is consistent with the Urban Service Area designation. The Urban Service Area consists of existing developed and undeveloped land within the SOI that is currently served by existing urban facilities, utilities and services or is proposed to be served within five years.
With the exception of city incorporations LAFCO shall adopt a sphere for affected agencies prior to consideration of related boundary changes.	The project is consistent with the City's Sphere of Influence as approved by LAFCO.
When a proposal is inconsistent with the adopted SOI the applicant shall justify reasons for amending the SOI	The proposed project is consistent with the 2007 expansion of the Urban Services Area and SOI.
Proposals involving changes of organization or reorganization affecting city boundaries shall comply with the Urban Service Area and Urban Transition Area designations.	The proposed project is consistent with the 2007 expansion of the Urban Services Area and SOI.
<b><i>Environmental Impact Assessment</i></b>	
LAFCOs are subject to the terms of the CEQA and the regulations of the California Resource Agency, which establishes the guidelines for its implementation.	As part of the proposed project approval a Supplemental EIR has been prepared and submitted to augment the original EIR.
The potential environmental impacts of proposals involving changes of organization or reorganization shall be reviewed by LAFCO environmental staff and the appropriate environmental determination shall be	As part of the proposed project approval a Supplemental EIR has been prepared and submitted to augment the original EIR. LAFCO is an active participant with the City and will

<b>Policy Summary</b>	<b>Discussion</b>
considered by LAFCO in accordance with state law and the State's "Guidelines for implementation of the California Environmental Quality Act."	be commenting on the Draft environmental document. Preliminary comments have been responded to by the City of Greenfield.
<b><i>Economics, Service Delivery and Development Patterns</i></b>	
LAFCO shall discourage proposals that would have adverse financial impacts on the provisions of governmental services or would create a relatively low revenue base in relationship to the cost of affected services.	The City's General Plan contains numerous policies to ensure that adequate public services and facilities exist to serve new developments and that new development does not adversely impact the provision of public services and facilities to the existing city. These policies include: Program 2.1.C, Program 2.1.D, Program 2.1.E, Program 2.1.F, Policy 3.2.2, Policy 3.2.3, Policy 3.2.4, Program 3.2.C, Program 3.2.D and Program 3.2.F.
Applications must address current and ultimate needs for governmental services and facilities as established by the appropriate land use plans and rezoning.	The project would ultimately need the provision of municipal water and sewer services to reach the required densities called for in the City of Greenfield's General Plan and Zoning Ordinance. The proposed project would receive all of its required governmental services from the City of Greenfield.
Applications must indicate that the affected agencies have the capabilities to provide service.	The original EIR and SEIR for the project discusses waste water treatment, stormwater drainage facilities, water supply, and solid waste disposal; and found that there was and is adequate capacity to serve the proposed project.
The local agency must submit a resolution of application for change of organization or reorganization.	Resolution 2016-XXX will be incorporated into the LAFCO applications. The resolution incorporates the LAFCO requirements for services to be extended into the project and the level of service.
LAFCO discourages proposals which will facilitate development that is not in the public interest due to the topography, isolated from existing developments, premature intrusion of urban-type developments into a predominantly agricultural area, or other pertinent economic or social reason.	The proposed project had no significant topographical features. The project is adjacent to existing municipal residential, commercial and industrial developments; and was planned for in the 2007 expansion of the Urban Services Area.
LAFCO shall consider the testimony from all potentially affected agencies or individuals in reviewing boundary change proposals.	<b>Pending public review.</b>
<b><i>Phasing</i></b>	
LAFCO shall consider the appropriateness of phasing annexation proposals which include territory that is not within a city/district's urban services area and has an expected build-out over a period longer than five to seven years.	The proposed project is expected to have a build-out of 10-20 years but is contained entirely within the City's adopted urban service area. Since the territory is entirely within the city's urban services area phasing of the annexation would not be appropriate for this project.
Changes of organization and reorganization proposals which are totally within a city or district's adopted urban service area shall not be appropriate for phasing.	The proposed project is contained entirely within the City's adopted urban services area.
Proposals which contain territory which is not within a	The proposed project is expected to have a build-out of

<b>Policy Summary</b>	<b>Discussion</b>
city or district's adopted urban services area and have an expected build-out extending beyond a five to seven year period may be considered appropriate for phasing.	10-20 years but is contained entirely within the City's adopted urban service area. Since the territory is entirely within the city's urban services area phasing of the annexation would not be appropriate for this project.
<b><i>Open Space and Agricultural Land</i></b>	
LAFCO encourages and seeks to provide for planned, well-ordered, efficient urban development pattern while at the same time remaining cognizant of the need to give appropriate consideration to the preservation of open space and agricultural land within such patterns.	LAFCO has been a partner with the City of Greenfield on the city's development patterns and direction for several years, culminating in the city's SOI boundary. For this current annexation project, LAFCO has been a participant with the City and state DOC to develop specific mitigation and conservation strategies which fit within the city's well-planned land use pattern.
<b><i>Groundwater Standards</i></b>	
LAFCO shall review the following information: a) The projected water demand of the proposed project based in guidelines provided by the appropriate water agency; b) the existing water use and historical water use over the past five years; c) a description of the existing water system including system capacity serving the site; d) a description of proposed water system improvements; e) a description of water conservation or reclamation improvements that are to be incorporated into the project; f) an analysis of the impact that proposed water usage will have on the groundwater basin with respect to water quality and quantity, including cumulative impacts; g) evidence of consultation with the appropriate water agency; h) a description of water conservation measures currently in use and planned for use on the site; i) a description of how the proposed project complies with adopted water allocation plans; j) a description of those proposals where the agency has achieved water savings or where new water sources have been developed that will off-set increases in water use on the project; k) a description of how the proposal would contribute to and cumulative adverse impact on the ground water basin; l) a description of those boundary change proposals that, when considered individually and after taking into account all mitigation measures to be implemented with the project, still cause a significant adverse impact on the groundwater basin.	<ul style="list-style-type: none"> <li>a) Water demand is based on City master plan documents and the Urban Water Management Plan, as summarized in the CEQA documents.</li> <li>b) There is minimal existing urban water usage on the site. Agricultural water usage is more intensive than the proposed uses.</li> <li>c) The City of Greenfield operates a water supply and delivery system that will serve the site.</li> <li>d) The tentative map includes water system improvement plans. Other uses are defined to the same level.</li> <li>e) The project is subject to conservation measures as conditions of approval.</li> <li>f) The environmental documents conclude that quantities are sufficient to supply the project without depleting groundwater supplies.</li> <li>g) The City of Greenfield is the local water agency.</li> <li>h) The proposed project is subject to the City of Greenfield's water conversation goals, policies, and programs as stated in the General Plan.</li> <li>i) There is no adopted water allocation plan in the City of Greenfield. Groundwater resources are of sufficient quantity and quality to serve the project, as well as the City's larger planning area.</li> <li>j) The City of Greenfield uses a progressive pricing structure for water to encourage water savings.</li> <li>k) The groundwater conditions in the southern sub-basin of the Salinas Valley aquifer are sufficient in quantity and quality to serve the proposed project. Although the General Plan EIR identifies a potentially significant impact associated with cumulative development within the Salinas Valley, the City's policies support water conservation and other long-term measures (such</li> </ul>

Policy Summary	Discussion
	<p>as the Salinas Valley Water Project) to address this issue at a regional level.</p> <p>1) The proposed project will not result in a significant and unavoidable adverse impact on the groundwater basin.</p>
<b><i>Regional Traffic Impacts</i></b>	
<p>LAFCO shall consider as part of its decision whether the proposal mitigates its regional traffic impacts by, for example, monetary contribution to a regional transportation improvement fund as established by the Transportation Agency of Monterey County or otherwise.</p>	<p>There is currently no fee collection mechanism in place by the City, TAMC or Caltrans for funding U.S. Highway 101 widening within or outside the City of Greenfield, and no cost estimates have been developed by TAMC for such a project in order to assess a meaningful fee. As freeway segment level of service is the primary cumulative impact forecasted by the City of Greenfield, any logical fee program for the City would be expected to include mainline improvements such as additional freeway lanes and financial assistance with interchange improvements. At this time, such improvements or direct assistance are not included in the program.</p> <p>The City of Greenfield’s Traffic Impact Fee (TIF) program has identified \$90 million of new local improvements, including major interchanges and freeway ramp improvements. The City’s new TIF is approximately \$9,000 per dwelling unit to provide this comprehensive menu of improvements, many of which include “regional” improvements because they improve access and operations along Highway 101 within the City.</p> <p>The City of Greenfield supports the concept of shared responsibility for regional and cumulative impacts, as evidenced by the adopted General Plan policies that support such an approach. The City of Greenfield adopted a Notice of Intent (NOI) to establish a regional development impact fee (Resolution Number 2006-82) and to condition all new development projects with payment of the regional impact fee on a project-by-project basis, pending approval of the fee program by the TAMC Board and Joint Powers Agreement.</p> <p>If a regional impact fee has been established at the time building permits are pulled for the proposed project, then they may be subject to such a fee at that time.</p>
<b><i>Efficient Urban Development Patterns</i></b>	
<p>For annexations and Sphere of Influence applications, Monterey County LAFCO shall consider as part of its decision whether the city in which the annexation or Sphere of Influence amendment is proposed has included certain goals, policies, and objectives, into its general plan that encourage mixed uses, mixed densities, and development patterns that will result in increased efficiency of land use, and that encourages and provides planned, well-ordered, efficient urban development</p>	<p>The City of Greenfield has adopted goals and policies, which encourages compact city growth. Policies 2.1.9, 2.1.14, 2.2.3, 2.2.4, 2.3.3, 2.3.9, 2.3.10 2.6.1, 2.6.2, and 2.8.2 establish compact and efficient growth patterns by encouraging infill and intensification of land uses through the reuse or redevelopment of vacant or underutilized land; by encouraging Traditional Neighborhood Development (TND) and New Urbanist design principles; by preserving the areas planned for</p>

Policy Summary	Discussion
patterns.	<p>multi-family residential development; by enhancing the City's downtown by concentrating business services and public buildings and spaces in a functional and efficient manner; and by promoting compact city growth and phased extension of urban services to discourage sprawl.</p> <p>The proposed project includes low density residential on the Scheid West parcel; however, city envisions a broader mix of housing types, lot sizes, and compact design City wide. The densities in this location are appropriate for this location at the south end of town. The project in this context is also consistent with the land use density for the site as determined by the <i>Greenfield General Plan</i>.</p>
<b><i>Disadvantaged Unincorporated Communities</i></b>	
<p>Except as otherwise allowed pursuant to Section 56375 (a) (8), LAFCO shall not approve an annexation to a city of any territory greater than 10 acres, or as determined by Commission policy, where there exists a disadvantaged unincorporated community that is contiguous to the area of proposed annexation unless an application to annex the disadvantaged unincorporated community to the subject city has been filed with the Executive Officer</p>	<p>There are no Disadvantaged Unincorporated Communities contiguous to the proposed project.</p>

- Cortese-Knox-Hertzberg Act Policies:*** The following table presents the relevant sections of the Cortese-Knox- Hertzberg Local Government Reorganization Act of 2000 as amended, codified in the California Government Code, which reflect the duties and powers of LAFCO regarding the South End annexation, and describes the project's consistency with such requirements.

**Cortese-Knox-Hertzberg Local Government Reorganization Act Consistency**

Gov't Code	Criteria	Analysis
56375	<p>The commission shall have all of the following powers and duties subject to any limitations upon its jurisdiction set forth in this part:</p> <p>(a) To review and approve or disapprove with or without amendment, wholly, partially, or conditionally, proposals for changes of organization or reorganization, consistent with written policies, procedures, and guidelines adopted by the commission.</p> <p>(b) ...to determine if the territory is inhabited or uninhabited.</p> <p>....</p> <p>(g) To adopt written procedures for the evaluation of proposals. The commission may adopt standards for any of the factors enumerated in Section 56668, Any standards adopted by the commission shall be written.</p>	<p><b>Consistent.</b> The City of Greenfield proposes to seek LAFCO approval to annex territory into the City limits to allow for a mix of highway commercial, residential and industrial uses.</p> <p>Pursuant to 56425(h), the Proposed annexation area is uninhabited, and proposed and planned for more intensive development to increase the use of the area. LAFCO of Monterey County adopted "Policies and Procedures Relating to Sphere of Influence and Changes of Organization and Reorganization" on April 25, 2011 (per 56375 (g)) and it adopted the City's Sphere of Influence boundary in 2007. On June 24, 2013 LAFCO adopted Resolution No. 13-13 which established a Memorandum of Agreement between the City of Greenfield, County of Monterey and LAFCO Monterey County. That document established written procedures for the review and evaluation of proposals.</p>
56425	<p>(a) In order to carry out its purposes and responsibilities for planning and shaping the logical and orderly development and coordination of local governmental agencies to advantageously provide for the present and future needs of the county and its communities, the commission shall develop and determine the sphere of influence of each local governmental agency within the county and enact policies designed to promote the logical and orderly development of areas within the sphere.</p> <p>(h) When adopting, amending, or updating a sphere of influence for a special district, the commission shall do all of the following:</p> <p>(1) Require existing districts to file written statements with the commission specifying the functions or classes of services provided by those districts.</p> <p>(2) Establish the nature, location, and extent of any functions or classes of services provided by existing districts.</p> <p>Determine that, except as otherwise authorized by the regulations, no new or different function or class of service shall be provided by any existing district, except upon approval by the commission.</p>	
56668	<p>Factors to be considered in the review of a proposal shall include, but not be limited to, all of the following: Population, population density; land area and land use; per capita assessed valuation; topography, natural boundaries, and</p>	<p><b>Consistent.</b> In reviewing the proposed annexation, LAFCO would consider the items required to be reviewed by the government code, including evaluation of the financial and physical ability of the City to provide services</p>

***Cortese-Knox-Hertzberg Local Government Reorganization Act Consistency***

<b>Gov't Code</b>	<b>Criteria</b>	<b>Analysis</b>
	<p>drainage basins; proximity to other populated areas; the likelihood of significant growth in the area, and in adjacent incorporated and unincorporated areas, during the next 10 years.</p> <p>(b) Need for organized community services; the present cost and adequacy of governmental services and controls in the area; probable future needs for those services and controls; probable effect of the proposed incorporation, formation, annexation, or exclusion and of alternative courses of action on the cost and adequacy of services and controls in the area and adjacent areas.</p> <p>“Services,” as used in this subdivision, refers to governmental services whether or not the services are services which would be provided by local agencies subject to this division, and includes the public facilities necessary to provide those services.</p> <p>(c) The effect of the proposed action and of alternative actions, on adjacent areas, on mutual social and economic interests, and on the local governmental structure of the county.</p> <p>(d) The conformity of both the proposal and its anticipated effects with both the adopted commission policies on providing planned, orderly, efficient patterns of urban development, and the policies and priorities set forth in Section 56377.</p> <p>(e) The effect of the proposal on maintaining the physical and economic integrity of agricultural lands, as defined by Section 56016.</p> <p>(f) The definiteness and certainty of the boundaries of the territory, the nonconformance of proposed boundaries with lines of assessment or ownership, the creation of islands or corridors of unincorporated territory, and other similar matters affecting the proposed boundaries.</p> <p>(g) Consistency with city or county general and specific plans.</p> <p>(h) The sphere of influence of any local agency which may be applicable to the proposal being reviewed.</p> <p>(i) The comments of any affected local agency.</p> <p>(j) The ability of the newly formed or receiving entity to provide the services which are the subject of the application to the area, including the sufficiency of revenues for those services following the proposed boundary change.</p> <p>(k) Timely availability of wastewater/water supplies adequate for projected needs as specified</p>	<p>to the proposed annexation areas proposed. The changes to City boundaries are consistent with the City’s General Plan, Monterey County General Plan, associated land use designations and policies, in addition to environmental impact reports for prior proposals within the project area. Future planned development of the annexation area has been assumed and accounted for in the area planning and project EIRs.</p> <p>Additionally, the project will maintain the physical and economic integrity of agricultural lands through the implementation of the WAEEP and establishment of permanent conservation easements.</p>

**Cortese-Knox-Hertzberg Local Government Reorganization Act Consistency**

Gov't Code	Criteria	Analysis
	<p>in Section 65352.5.</p> <p>(l) The extent to which the proposal will assist the receiving entity in achieving its fair share of the regional housing needs as determined by the appropriate council of governments.</p> <p>(m) Any information or comments from the landowner or owners.</p> <p>Any information relating to existing land use designations.</p>	
<b>56668.3</b>	<p>District annexation; factors to consider and adoption of resolution.</p> <p>(a) If the proposed change of organization or reorganization includes a city detachment or district annexation, except a special reorganization, and the proceeding has not been terminated based upon receipt of a resolution requesting termination pursuant to either Section 56751 or Section 56857, factors to be considered by the commission shall include all of the following:</p> <p>(1) In the case of district annexation, whether the proposed annexation will be for the interest of landowners or present or future inhabitants within the district and within the territory proposed to be annexed to the district.</p> <p>(2) In the case of a city detachment, whether the proposed detachment will be for the interest of the landowners or present or future inhabitants within the city and within the territory proposed to be detached from the city.</p> <p>(3) Any factors which may be considered by the commission as provided in Section 56668.</p> <p>(4) Any resolution raising objections to the action that may be filed by an affected agency.</p> <p>(5) Any other matters which the commission deems material.</p> <p>(b) The commission shall give great weight to any resolution raising objections to the action that is filed by a city or a district. The commission's consideration shall be based only on financial or service related concerns expressed in the protest. Except for findings regarding the value of written protests, the commission is not required to make any express findings concerning.</p>	
<b>56377</b>	<p>In reviewing and approving or disapproving proposals that could reasonably be expected to induce, facilitate, or lead to the conversion of existing open-space lands to uses other than open-space uses, the commission shall consider all of</p>	<p><b>Consistent.</b> All lands in and around Greenfield, with limited exceptions, are prime agricultural lands. There are no opportunities to direct development away from prime agricultural lands under any land use scenario. The impacts of the</p>

**Cortese-Knox-Hertzberg Local Government Reorganization Act Consistency**

Gov't Code	Criteria	Analysis
	<p>the following policies and priorities:</p> <p>(a) Development or use of land for other than open-space uses shall be guided away from existing prime agricultural lands in open-space use toward areas containing nonprime agricultural lands, unless that action would not promote the planned, orderly, efficient development of an area.</p> <p>(b) Development of existing vacant or nonprime agricultural lands for urban uses within the existing jurisdiction of a local agency or within the sphere of influence of a local agency should be encouraged before any proposal is approved which would allow for or lead to the development of existing open-space lands for non- open-space uses which are outside of the existing jurisdiction of the local agency or outside of the existing sphere of influence of the local agency.</p>	<p>proposal have been fully disclosed in the environmental documents, and the land use pattern has been developed in consultation with LAFCO.</p>
<p><b>56064</b></p>	<p>“Prime agricultural land” means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:</p> <p>(a) Land that qualifies, if irrigated, for rating as class I or class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.</p> <p>(b) Land that qualifies for rating 80 through 100 Stories Index Rating.</p> <p>(c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Handbook on Range and Related Grazing Lands, July, 1967, developed pursuant to Public Law 46, December 1935.</p> <p>Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars (\$400) per acre.(e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars (\$400) per acre for three of the previous five calendar years.</p>	<p><i>Consistent.</i> See above.</p>