CITY OF GREENFIELD

"SOUTH END" ANNEXATION PROJECT

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

SCH No. 2005121035

VOLUME I OF II

Prepared for:

CITY OF GREENFIELD
599 EL CAMINO
GREENFIELD, CA 93927

Prepared by:

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60 GARDEN COURT, SUITE 230
MONTEREY, CA 93940

JULY 2016

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1.0 Introduction

This section provides the background and context for the South End Annexation (proposed project), summarizes the purpose of the Supplemental Environmental Impact Report (SEIR), describes the environmental procedures that are to be followed according to state law, discusses the intended uses of this SEIR, provides contact information for the lead agency, and describes impact terminology.

1.1 BACKGROUND AND PURPOSE

On August 8, 2006, the City of Greenfield City Council approved the South End Sphere of Influence Amendment project and related amendments to the City of Greenfield General Plan. The City prepared the South End Sphere of Influence Amendment Project Final EIR (EIR) to analyze the environmental effects of the Sphere of Influence (SOI) and General Plan amendments; the EIR was certified by the City Council on August 8, 2006. The City subsequently filed a resolution of application with the Monterey County Local Agency Formation Commission (LAFCO) to expand the SOI boundary. On March 26, 2007, LAFCO approved a comprehensive, although scaled down, amendment to the City's SOI, which included the South End territories. This approval was conditioned upon a future agreement to address the impacts of planned future growth. That agreement, the Greater Greenfield Area Memorandum of Agreement (MOA), was adopted in June 2013.

The SOI amendment expanded the City's SOI by 217 acres to the south, along the east and west sides of US Highway 101. The accompanying General Plan amendments designated the areas on the west side of the highway as Low Density Residential and areas on the east side of the highway as Highway Commercial and Heavy Industrial, as shown on the current General Plan Land Use Map.

With the MOA in place, in 2015 the project applicant, representing the South End property owners, approached the City of Greenfield with a request to move forward with annexation of several parcels. City staff determined that the annexation and related actions requested require appropriate review under the California Environmental Quality Act (CEQA) to determine the potential environmental effects of those actions.

REASONING FOR PREPARING AN SEIR

Since the certification of the 2006 South End SOI EIR and LAFCO approval of the City's SOI boundary, certain circumstances have changed that warrant additional review. Most notably, the execution of the MOA outlines specific mitigation requirements and other policies directly related to annexation proposals that were not previously in place. In addition, the applicant's current request for entitlements is slightly different in size and configuration compared to the 2006 project description. For these reasons, the current proposal requires an updated review.

The City of Greenfield, acting as the lead agency, has prepared this Draft SEIR (also referred to as a DSEIR) to provide the public and responsible and trustee agencies with information about the potential environmental effects of the proposed project. As described in the provisions of CEQA and in CEQA Guidelines Section 15121(a), an EIR is a public information document that assesses the potential environmental effects of a proposed project as well as identifies mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. Public agencies are charged with the duty to consider and minimize environmental impacts of proposed development where feasible, and are obligated to balance a variety of public objectives including economic, environmental, and social factors.

CEQA requires the preparation of an EIR prior to approving any "project" that may have a significant effect on the environment. For the purposes of CEQA, the term "project" refers to the whole of an action which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]). With respect to the proposed project, the annexation and reorganization of territory is a project within the definition of CEQA and has the potential to result in significant environmental effects. As such, the physical effects of the annexation and related actions warrant additional review and documentation.

1.2 TYPE OF DOCUMENT

SUPPLEMENTAL EIR

The CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR has been prepared as a Supplemental EIR pursuant to CEQA Guidelines Section 15163.

CEQA provides that where there are changes to an already approved project for which an EIR was previously certified, a new environmental review shall be performed only where there is significant new information or changes to the project or in the circumstances surrounding the project that would result in new adverse environmental impacts that were not analyzed previously or impacts that are more severe than previously determined (Public Resources Code [PRC] Section 21166 and State CEQA Guidelines Section 15162). PRC Section 21166 applies to environmental review of any aspect of the South End Annexation because a prior EIR was certified for the proposed project in its entirety. CEQA provides several options regarding the form of supplemental analysis performed under PRC Section 21166. To broadly summarize the applicable law, after an EIR has been certified for a project, the EIR is conclusively presumed to comply with CEQA unless one of two circumstances occurs:

1. The EIR is timely and successfully challenged in a legal proceeding and is finally adjudged not to comply with the requirements of CEQA; or

2. A subsequent or supplemental EIR is required under the mandates of PRC Section 21166 and CEQA Guidelines Section 15162 (PRC Section 21167.2; CEQA Guidelines Section 15231).

Under these standards, an agency may not presume that an EIR is "stale" because of its age alone. The agency must review and follow the two tests set forth above to determine if supplemental review is, in fact, required.

As explained above, a programmatic EIR was certified for South End SOI project in 2006. This document has not been legally challenged; for this reason, the first circumstance detailed above is not met. As such, the South End SOI EIR must be presumed valid unless a subsequent or supplemental EIR is required under the mandates of PRC Section 21166 and CEQA Guidelines Section 15162.

CEQA Guidelines Section 15162, subdivision (a), sets forth a two-step test for supplemental review, which reads in full as follows:

(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environmental, but the project proponents decline to adopt the mitigation measure or alternative.

Thus, under PRC Section 21166 and CEQA Guidelines Section 15162, once an EIR has been certified for a project, no subsequent EIR shall be prepared for the project unless the lead agency determines, based on substantial evidence, that there will be a significant increase in environmental impacts caused by the project, from changes in the circumstances surrounding the project, or from newly discovered information.

In this case, the City has determined that there are changes to the project which could result in different or more severe impacts, new or additional mitigation may be required, and changes in circumstances have occurred, specifically the adoption of the MOA. Therefore, it has been determined that supplemental environmental review is required for the proposed project.

There are three types of documents that may be used to perform supplemental review: an Addendum, a Supplemental or Subsequent Negative Declaration, or a Supplemental or Subsequent EIR (see CEQA Guidelines Sections 15162–15164). Based on substantial evidence presented in the project submittal, NOP, and comments received on the NOP (see **Appendix G**),

it was determined that there was potential for significant impacts to result from implementation of the proposed project and a Supplemental EIR would be required.

1.3 INTENDED USES OF THE SEIR

The SEIR is intended to evaluate the environmental impacts of the proposed project to the greatest extend feasible. This SEIR and the 2006 South End SOI Final EIR, in accordance with CEQA Guidelines Section 15126, should be used as the primary environmental documents to evaluate all planning and permitting actions associated with the proposed project. Please refer to Section 2.0, Project Description, for a detailed discussion of the proposed project.

CITY OF GREENFIELD

The SEIR is intended to be used by the City of Greenfield as a tool in evaluating the proposed project's environmental impacts and can be further used to modify, approve, or deny approval of the proposed project based on the analysis provided in the SEIR. A description of requested permits and subsequent approvals associated with approval and implementation of the proposed project is included in Section 2.0 Project Description, of this SEIR.

KNOWN RESPONSIBLE AND TRUSTEE AGENCIES

For the purpose of CEQA, the term "responsible agency" includes all public agencies other than the lead agency that have discretionary approval power over a project or an aspect of a project. The term "trustee agency" means a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of California. The following agencies are identified as potential responsible or trustee agencies, and may use this document in the processing and approval of subsequent actions and/or permits.

- County of Monterey, Resource Management Agency (RMA)
- Monterey County Local Agency Formation Commission (LAFCO)
- California Department of Conservation (DOC)
- California Department of Transportation (Caltrans)

1.4 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the SEIR will involve the following procedural steps:

NOTICE OF PREPARATION AND INITIAL STUDY

In accordance with Section 15082 of the CEQA Guidelines, the City published a Notice of Preparation (NOP) of an SEIR on December 10, 2015. The City was identified as the lead agency for the proposed project. This notice was circulated to the public, local, state, and federal agencies, and other interested parties for 30 days to solicit comments on the proposed project. The NOP and responses to the NOP are presented in **Appendix G**.

DRAFT SUPPLEMENTAL EIR (DSEIR)

This document constitutes the Draft SEIR for the proposed project. This DSEIR contains a description of the project, description of the environmental setting, and identification of project impacts and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives. Upon completion of the SEIR, the City will file the Notice of Completion (NOC) with the California Office of Planning and Research to begin the public review period (PRC Section 21161).

PUBLIC NOTICE/PUBLIC REVIEW

Concurrent with the Notice of Completion, the City will provide public notice of the availability of the SEIR for public review and invite comment from the general public, agencies, organizations, and other interested parties. This public notice of availability is issued to comply with the CEQA Guidelines, which state that circulation of an EIR requires notice pursuant to CEQA Guidelines Section 15087. CEQA Guidelines Section 15086 also states that circulation requires consultation with other agencies. The review period is 45 days. Public comment on the SEIR will be accepted in written form. All comments or questions regarding the SEIR should be addressed to:

Mic Steinmann, Community Services Director
City of Greenfield
599 El Camino
Greenfield, CA 93927
Phone: (831) 674-5591
E-mail: msteinmann@ci.greenfield.ca.us

RESPONSE TO COMMENTS/FINAL SEIR

Following the public review period, a Final SEIR will be prepared. The Final SEIR will respond to all comments regarding the adequacy and completeness of the Draft SEIR received during the public review period and to oral comments made at the public meeting held during the public review period.

CERTIFICATION OF THE SEIR

The Greenfield Planning Commission and City Council will review and consider the Final SEIR. If the City Council finds that the Final SEIR is an "adequate and complete" analysis of the environmental impacts associated with the proposed project, the Council may certify the Final SEIR at a public hearing. The rule of adequacy generally holds that the SEIR can be certified if: (1) it shows a good faith effort at full disclosure of environmental information; and (2) it provides sufficient analysis to allow decisions to be made regarding the project in contemplation of its environmental consequences. Consideration of the Final SEIR will occur independent of consideration to approve the project. Responsible and trustee agencies may be required to independently certify the document prior to approval of subsequent actions and permits.

PROJECT CONSIDERATION

Following review and consideration of the Final SEIR, the City may take action to approve, approve with conditions, revise, or reject the project. A decision to approve the project would be accompanied by specific conditions of approval, imposing all feasible mitigation measures recommended in the SEIR as adopted, by written findings in accordance with CEQA Guidelines

Section 15091 and, if applicable, a statement of overriding considerations pursuant to CEQA Guidelines Section 15093.

MITIGATION MONITORING PROGRAM

Public Resources Code Section 21081.6(a) requires lead agencies to adopt a reporting or monitoring program to describe mitigation measures that have been adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. The specific reporting or monitoring program required by CEQA is not required to be included in the SEIR; however, the program will be presented to the City Council for adoption. Throughout this Draft SEIR, mitigation measures have been clearly identified and presented in language that will facilitate establishment of a monitoring and reporting program.

1.5 COMMENTS RECEIVED ON THE NOTICE OF PREPARATION

The City received four comment letters on the NOP for the proposed project. A copy of each letter is provided in **Appendix G**. The City received letters from the following agencies and interested parties. The City has addressed these comments within the SEIR and previously certified EIR, as information is available (with respect to project plan details) and as appropriate under California planning law.

1. **Monterey County Resource Management Agency (RMA)**. Comments focused on agricultural land mitigation, agricultural buffers, truck routes, and the required minor subdivision. The Sheriff's Office also noted a potential increase for calls for service.

2. **California Department of Conservation (DOC)**. Comments focused on the requirements for Williamson Act contract cancellation.

3. **Transportation Agency for Monterey County (TAMC)**. TAMC's comments reaffirm previous comments from the certified EIR, provide guidance on developing updated analysis, and comment on Smart Growth concepts.

4. **California Department of Toxic Substances Control (DTSC).** Comments note the DTSC's responsibilities and request that the findings of project-related Phase I or Phase II Environmental Site Assessments be disclosed given the existing agricultural use of the parcels.

1.6 IMPACT TERMINOLOGY

This Draft SEIR uses the following terminology to describe environmental effects of the proposed project:

Standards of Significance: A set of criteria used by the lead agency to determine at what level or "threshold" an impact would be considered significant. Significance criteria used in this SEIR include the CEQA Guidelines; factual or scientific information; regulatory performance standards of local, state, and federal agencies; and adopted City policies and ordinances.

Less Than Significant Impact: A less than significant impact would cause no substantial change in the physical conditions of the environment (no mitigation required).

Significant Impact: A significant impact would cause (or would potentially cause) a substantial adverse change in the physical conditions of the environment. Significant impacts are identified by the evaluation of project effects using specified standards of significance. Mitigation measures and/or project alternatives are identified to reduce project effects to the environment.

Significant Unavoidable Impact: A significant and unavoidable impact would result in a substantial change in the environment that cannot be avoided or mitigated to a less than significant level if the project is implemented.

Less Than Cumulatively Considerable Impact: The project's contribution to a cumulative impact is less than significant when evaluated in the context of reasonably foreseeable development in the surrounding area.

Cumulative Significant Impact: A cumulative significant impact would result in a new substantial change in the environment from effects of the project when evaluated in the context of reasonably foreseeable development in the surrounding area.

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2.0 Project Description

2.1 PROJECT LOCATION

REGIONAL LOCATION

The South End ~~SOI Amendment~~Annexation project site is located in the southern portion of and immediately south of Greenfield, situated in the southern Salinas Valley in central Monterey County. US Highway 101 (US 101) is the main regional highway in this area, running north and south through the Salinas Valley. The city is located along US 101, approximately 40 miles southeast of Monterey Bay, 35 miles south of Salinas, and 60 miles north of Paso Robles. Neighboring communities within 25 miles include the cities of Gonzales and Soledad to the north, and King City to the south. The project's regional location is illustrated in **Figure 2-1.**

Project Vicinity and General Site Conditions

The approximately 290~~267~~-acre project area is located at the City of Greenfield's southern edge, immediately south of the city's incorporated boundaries. US 101 bisects the project site into eastern and western sections. On the east side of the highway, the site is bounded by agricultural uses to the south and east, Espinosa Road to the south, and agriculture and light industrial uses to the north. On the west side of US 101, the project site is bounded by Greenfield High School and Vista Verde Middle School to the north, and agricultural uses to the south and west. The St. Charles Place mixed use development sits between the project's eastern and western sections, between El Camino Real and the highway.

The parcels that comprise the project area total approximately ~~267~~ 290 acres, most of which is irrigated farmland currently used to grow row crops and vineyards. Three acres are used for agricultural equipment storage. The acreage also includes approximately 25 acres of County and Caltrans rights~~-~~-of~~-~~-way. The topography of the project site and relative vicinity is generally flat, typical of the Salinas Valley region. The site lies at an elevation of approximately 280 feet above mean sea level with the ground surface sloping gently to the south. The project vicinity is illustrated in **Figure 2-2.**

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Figure 2-1
Regional Location

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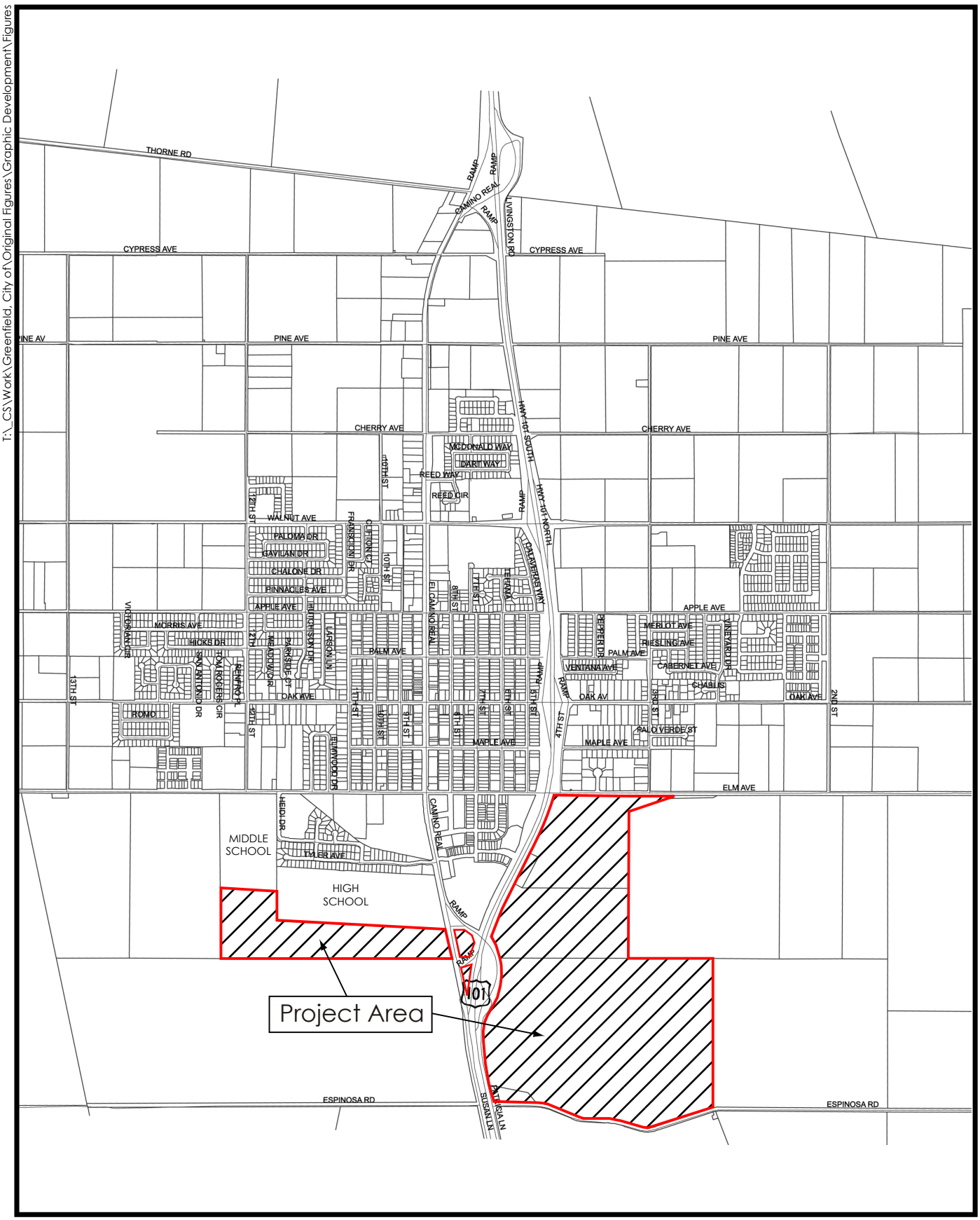

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Figure 2-2

Project Vicinity

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2.2 CURRENT OWNERSHIP AND PARCELIZATION

The South End ~~SOI~~ Annexation project site is comprised of ~~four~~ seven parcels under the ownership of ~~three~~ separate entities. The property owners include Scheid Vineyards, the Franscioni family (TMV Lands), NH3, and the L.A. Hearne Company. TMV Lands has real interest in 173~~1~~ acres (APN 221-011-017) located north of Espinosa Road on the east side of Highway 101. Scheid Vineyards has real interest in ~~93~~ 138 acres (APN 221-011-07~~1~~0, -071 and 221-011-068) located east and west of the highway. LA Hearne Company owns APN 221-011-018, which consists of approximately three acres, located at the southwest corner of US Highway 101 and Espinosa Road. APNs 221-011-041 and -045 are owned by NH3, consisting of approximately 3 additional acres. **Table 2-1** summarizes the ownership, size, current uses, and proposed future use of each parcel.

TABLE 2-1
CURRENT AND FUTURE USES BY PARCEL OWNERSHIP

APN	Owner	Size (acres)	Current Use	Proposed Future Use
221-011-017	Ray Franscioni (TMV Lands)	173~~1~~	Farming/ Agriculture	Highway Commercial, Heavy Industrial/Warehouse, and Agricultural Easement (51.6–acre ag easement will not be annexed)
221-011-071	Scheid Vineyards	45~~6~~	Farming/ Agriculture	Highway Commercial and Heavy Industrial/Warehouse
221-011-070	Scheid Vineyards	46	Farming/ Agriculture	Heavy Industrial/Warehouse
221-011-068	Scheid Vineyards	47	Farming/ Agriculture	Low Density Residential
221-011-018	L.A. Hearne Company	3	Agricultural Equipment Storage	Highway Commercial (agriculture sales)
221-011-041 and -045	NH3	3	Fertilizing operation	Fertilizing operation
n/a	County of Monterey/ Caltrans	25	Roadway rights–of–way	Roadway rights–of–way

2.3 ~~PLANNING REQUIREMENTS FOR EACH PARCEL~~PARCELS PROPOSED FOR ANNEXATION

The South End ~~SOI~~ Annexation project involves a series of complex land use actions and boundary changes that ultimately relate to the City of Greenfield's General Plan and ~~proposed~~ adopted Sphere of Influence boundaries. The project as described within this SEIR represents the "whole of the action", made up of several components and related entitlements.~~However, because the four parcels comprising the project involve slightly different land use actions specific to each parcel, the disposition of each is described in more detail below.~~ Each of the parcels proposed for annexation and future development ~~are~~is identified below.~~:~~

APN 221-011-017 – "Franscioni" Parcel". This 173–-acre parcel was included within the City's General Plan and proposed SOI boundaries in 2005, and is designated as Highway Commercial and Heavy Industrial within the General Plan. The 2007 LAFCO-approved SOI boundary, however, excluded the easternmost 51.6 acres of this parcel. For this reason, 121.4 acres are currently proposed for annexation into the city, with General Plan designations of Highway Commercial and Heavy Industrial. The remaining 51.6 acres will be placed into a permanent agricultural conservation easement and will remain within unincorporated Monterey County. It will require a minor subdivision to parcel out the 51.6-acre conservation easement area. This action is described in detail later in this Project Description.

APN 221-011-017 – "Franscioni Parcel". This 171-acre parcel is not currently part of the City's General Plan area. As with all four parcels, it is also outside the existing City SOI. As such, this parcel will require a General Plan Amendment to bring the area into the General Plan and proposed SOI boundaries. The underlying land uses would be changed from Agriculture (Monterey County) to Highway Commercial and Heavy Industrial. The eastern portion of this parcel also contains an agriculture easement of approximately 50 acres. This agricultural easement is the result of a Williamson Act exchange agreement that is being prepared as part of this project. Under the exchange agreement (described in detail in Section 3.2), this 50-acre area would remain in agriculture. As such, 121 acres are considered "developable" for planning and descriptive purposes. As the Franscioni parcel is proposing both Highway Commercial and Heavy Industrial land uses, the City is also recommending subdivision of the parcel so that the various land use boundaries clearly match legal parcel lines. APN 221-0101-071 – APN 221-011-071 - "Scheid East" Parcel. This 456-acre parcel immediately north of Franscioni is currently within the City's General Plan and SOI boundaries, and is designated as Highway Commercial and Heavy Industrial. Because approximately half of the parcel is proposed for Highway Commercial, this parcel will require a General Plan land use change to allow the Highway Commercial use, as well as inclusion in the City's proposed SOI. Like the Franscioni parcel, the City is recommending subdivision of the parcel so that the two land use boundaries match legal parcel lines.

APN 221-011-070 – "Scheid East Industrial" Parcel. This 46-acre parcel north of the "Scheid East" parcel is currently in the City's General Plan and SOI boundaries, and has a designation of Heavy Industrial. This parcel was included and analyzed as part of the City's 2005 General Plan Uupdate, and most of the parcel was included in the City's pre-2007 SOI boundary.

APN 221-0101-018 – "L.A. Hearne" Parcel. This three-acre parcel at Highway 101 and Espinosa Road is currently used for agricultural equipment storage and sales. This parcel has been included in the project boundaries primarily to create a more uniform SOI boundary and to allow better planning opportunities at the intersection of primary roadways. Agricultural-related storage and sales uses will continue at this location. This parcel requires a General Plan land use change from Agriculture (County) to Highway Commercial (City), as well as inclusion within the City's proposed SOI boundary.

APNs 221-011-041 and -045 – NH3 Parcels. These small parcels totaling approximately three3 acres are bounded by HighwayUS 101 and El Camino Real. These parcels were included in the LAFCO-approved 2007 SOI update to create a more logical boundary and to avoid land use islands. They carry a General Plan designation of P-QP (Public, Quasi Public (P-QP), as they are surrounded by roadways. Existing fertilizer operations are planned to continue into the future.

APN 221-01~~0~~1-068 – "Scheid West" Parcel. This 47-acre "L" shaped parcel west of the highway ~~requires a General Plan amendment to bring the property from Agriculture (County) to Low Density Residential (City)~~was included in the approved SOI boundary and has a General Plan designation of Low Density Residential. In addition to annexation, the application is seeking to process a Tentative Subdivision Map that would allow 149 single-family residential units and associated improvements.

All parcels (including ~~a constrained 3-acre parcel lodged between Highway 101 and El Camino Real and~~county- and state-owned incidental right of way area included within the proposed SOI) ~~are~~ were part of a single General Plan Amendment adopted by the City to accommodate the land uses described above. ~~All parcels will also be part of the City of Greenfield's larger city-wide Sphere of Influence amendment, described below. The applicants have requested annexation of the four parcels into the City of Greenfield, although annexation may be part of an application to LAFCO apart from and subsequent to the application to amend the SOI.~~

Parcels are illustrated in **Figure 2-3.** Proposed land uses are shown in **Figure 2-4.**

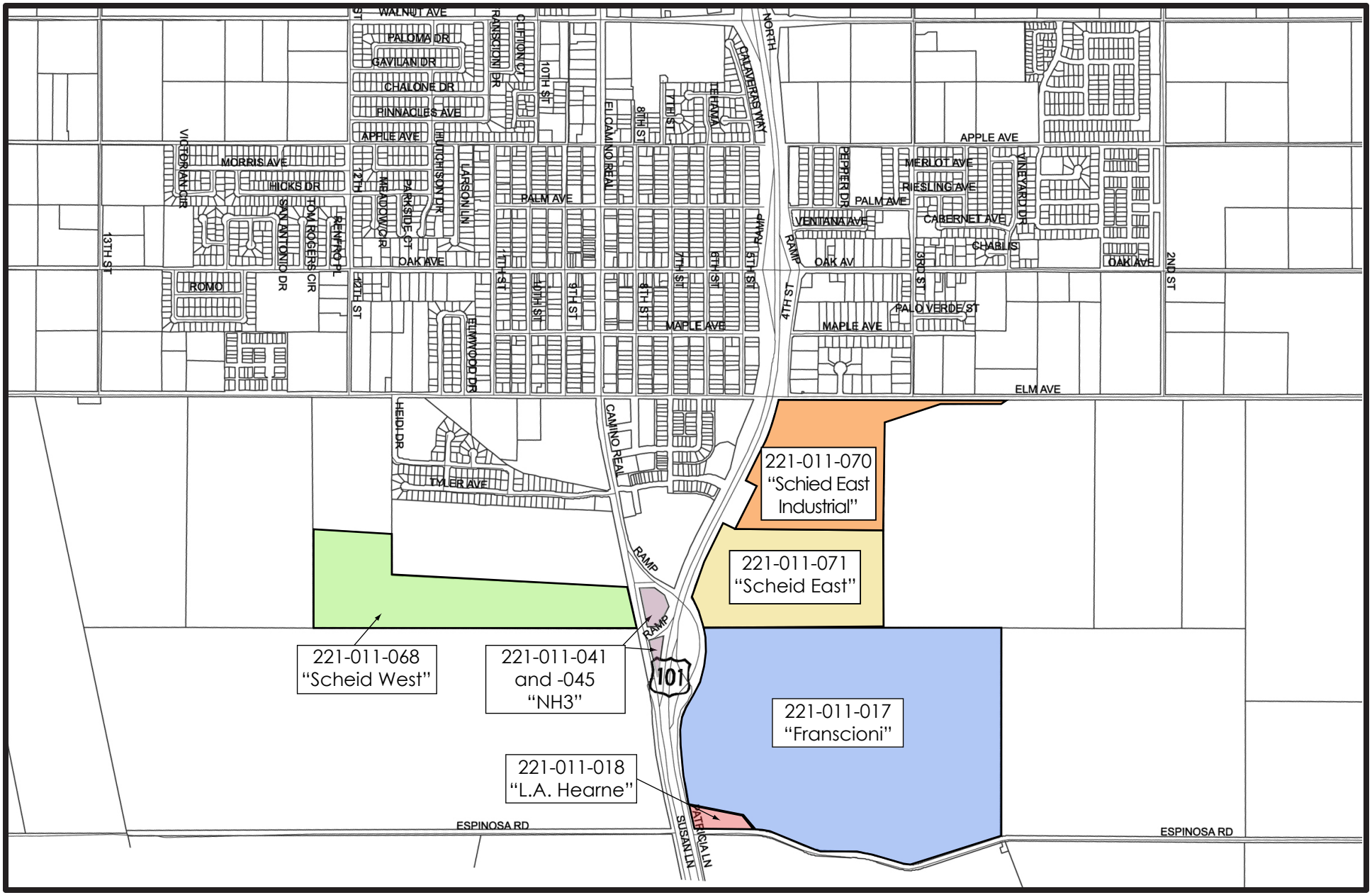

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Figure 2-3
Subject Parcels

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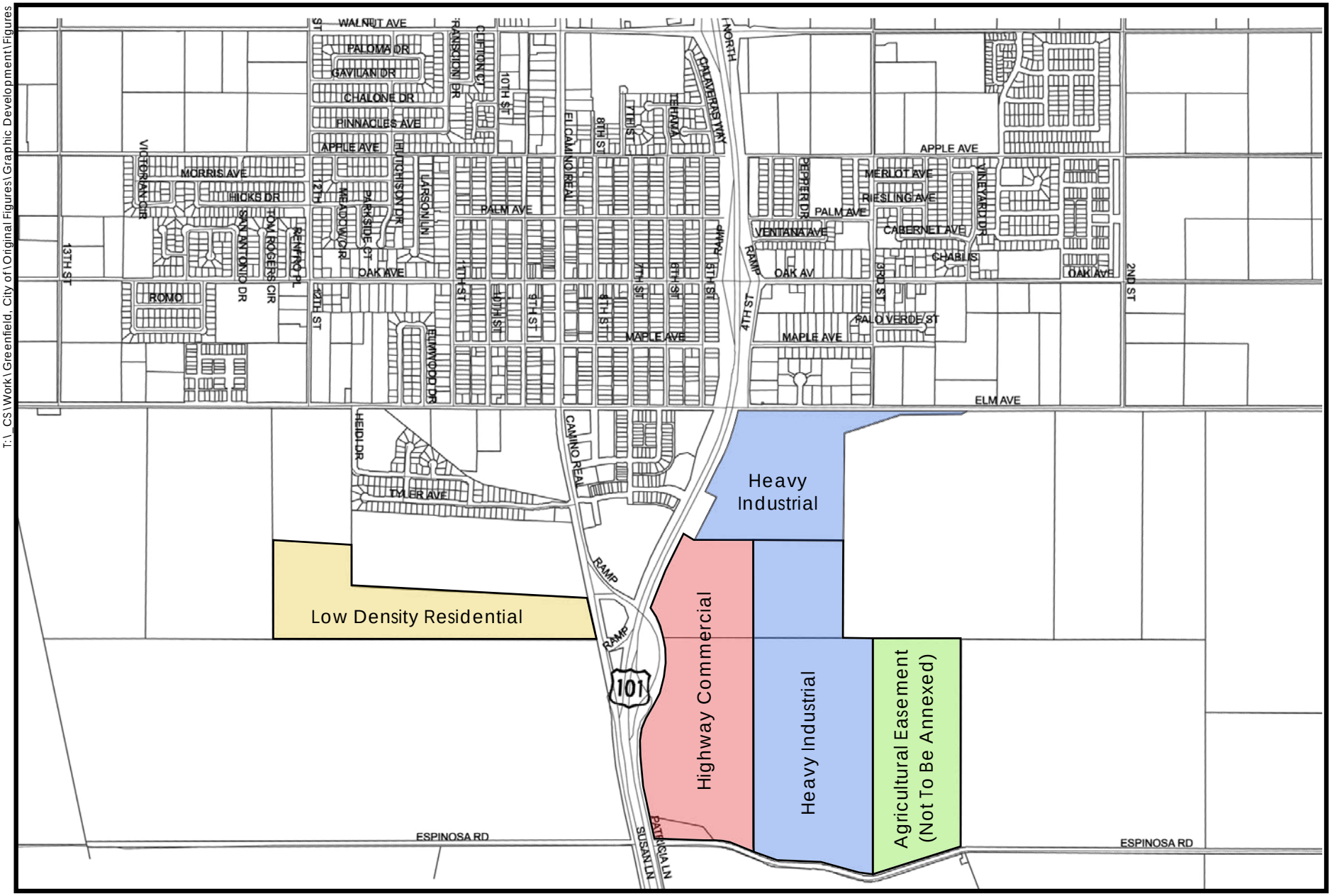

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Figure 2-4
Proposed Land Use

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T:_CS\Work\Greenfield, City of\Original Figures\Graphic Development\Figures

~~2.4 Project Relationship to the Greenfield City-Wide SOI Amendment~~

~~The City of Greenfield adopted a comprehensive General Plan Update in May 2005. Following adoption, the City began preparing an application to LAFCO Monterey County to amend its city-wide SOI boundary to match its new General Plan planning boundaries.~~

~~Based on continued public input and meetings with LAFCO staff, the City is considering changes (amendments) to its adopted General Plan and proposed SOI. The amendments are focused on removing areas of extremely high quality farmland on the east, and making a more logical boundary adjustment on the west. Those amendments are in process at this time, and are anticipated to be complete by the time the City submits an application to LAFCO to amend its SOI boundary. This issue is also discussed in Section 3.9, Land Use.~~

~~The South End SOI Project was proposed to city officials near the end of the General Plan process. At that time, the City decided to analyze the South End proposal, but to do so in a way that would not jeopardize the work already completed on the General Plan. As such, the South End SOI project is being considered and analyzed on its "own merits", as a separate and distinct project. Should the City decide to approve the South End SOI Project, the project boundaries will be included in the City's SOI Amendment application to LAFCO. The city-wide boundary will be considered by LAFCO as a whole. The environmental documents for the City's General Plan, together with this EIR for the South End SOI, will constitute the environmental record for LAFCO's consideration of the entire city-wide SOI boundary. Should the City deny the South End SOI project, the City's application to LAFCO would show the South End project removed from the SOI.~~

2.4~~5~~ PROJECT LAND USE AND DEVELOPMENT CHARACTERISTICS

The project site consists of approximately ~~267~~ 290 acres of land south of the City of Greenfield incorporated limits. The current application requests multiple entitlements for ~~a General Plan Amendment, Sphere of Influence Amendment,~~ prezoning of property, and annexation of property. The applicant~~s~~ ~~are~~is also seeking approval of a Tentative Parcel Map (minor subdivision) of the Franscioni parcel~~,~~ and a vesting tentative map/major subdivision of the Scheid West parcel. ~~No subdivision maps or detailed site plans are proposed as part application.~~Specific development applications for specific uses and site planning will require additional processing and environmental review by the City of Greenfield.

A summary of proposed land uses and acreage ~~are~~ is shown in **Table 2-2** below.~~:~~

TABLE 2-2
LAND USE SUMMARY AND DEVELOPMENT POTENTIAL

Parcel	Total Acreage	Proposed Land Use	Development Potential
221-011-017 Franscioni	~~171~~173 (121.4 acres to be annexed)	Highway Commercial (61 acres), including: ~~Truck Stop~~Travel Center (25 acres) -Hotel/Motel (50 rooms) -Storage Facility (10 acres)	~~664,922~~ 137,840 sf
		~~Heavy I~~industrial/Warehouse (approx. 60 acres)	~~784,083~~ 501,500 sf

		Agricultural Easement (51.6~~50~~ acres~~-~~ not part of annexation)	None
221-011-068 Scheid West	47	Low Density Residential (47 acres)	~~329~~ 149 du (maximum)
221-011-071 Scheid East	4~~6~~5	Highway Commercial (23 acres)	~~250,471~~ 84,360 sf
		~~Heavy~~ Industrial/Warehouse (2~~3~~2 acres)	~~300,565~~ 198,000 sf
221-011-070 Scheid East Industrial	46	Industrial/Warehouse	375,500 sf
221-011-018 LA Hearne Company	3	Highway Commercial (3 acres)	32,670 sf (existing condition)
221-011-041 and -045 NH3	3	Public/Quasi-Public (existing fertilizer operation)	No change/existing condition
County and State Rights~~-~~of~~-~~Way	25	Roadways	No change/existing condition
Totals	~~267~~290	~~267~~ 290	~~915,393~~ 222,200 sf ~~–~~ new Highway Commercial ~~1,084,648~~ 1,074,000 sf – ~~Heavy~~ new Industrial/Warehouse ~~329~~ 149 du – new Low Density Residential

Notes and Assumptions:

1. *Development Potential is based on conceptual land use and planning estimates provided by the applicant reflecting anticipated market conditions and development yield~~site coverage (25% for Highway Commercial; 30% for Heavy Industrial)~~.*
2. *Specific Uses (~~truck stop~~travel center, motel, storage facility) are conceptual at this time. Exact uses and locations are estimated for analysis purposes only.*
3. *~~329~~ 149 residential units represents ~~maximum possible yield. Net yield is estimated at 293 units~~net yield as per the applicant's tentative map.*

Proposed Land Uses

Highway Commercial Development

If approved and implemented, highway commercial use would be developed along the eastside of Highway 101 on approximately 87 acres. The highway commercial portion of the project would be developed on the western portion of the Franscioni, Scheid East, and L.A. Hearne parcels. At this time, the applicant~~s~~ is ~~are~~ considering a range of uses, including a travel center that would accommodate visitors to Monterey County, ~~truck parking,~~ restaurants, and other visitor serving uses consistent with the City's Highway Commercial designation. No specific development plans have been proposed, the location of specific uses are not known, and the three-acre L.A. Hearne parcel will ~~probably~~ remain as an equipment storage and agriculture-related retail facility in the near term. ~~However, this~~This EIR assumes a development scenario and mix of uses not to exceed 222,200 square feet, based on preliminary planning estimates provided by the applicant~~buildout of all parcels at maximum allowable site coverage in order to provide a through and conservative analysis. Site coverage for highway commercial uses is assumed at 25 percent~~.

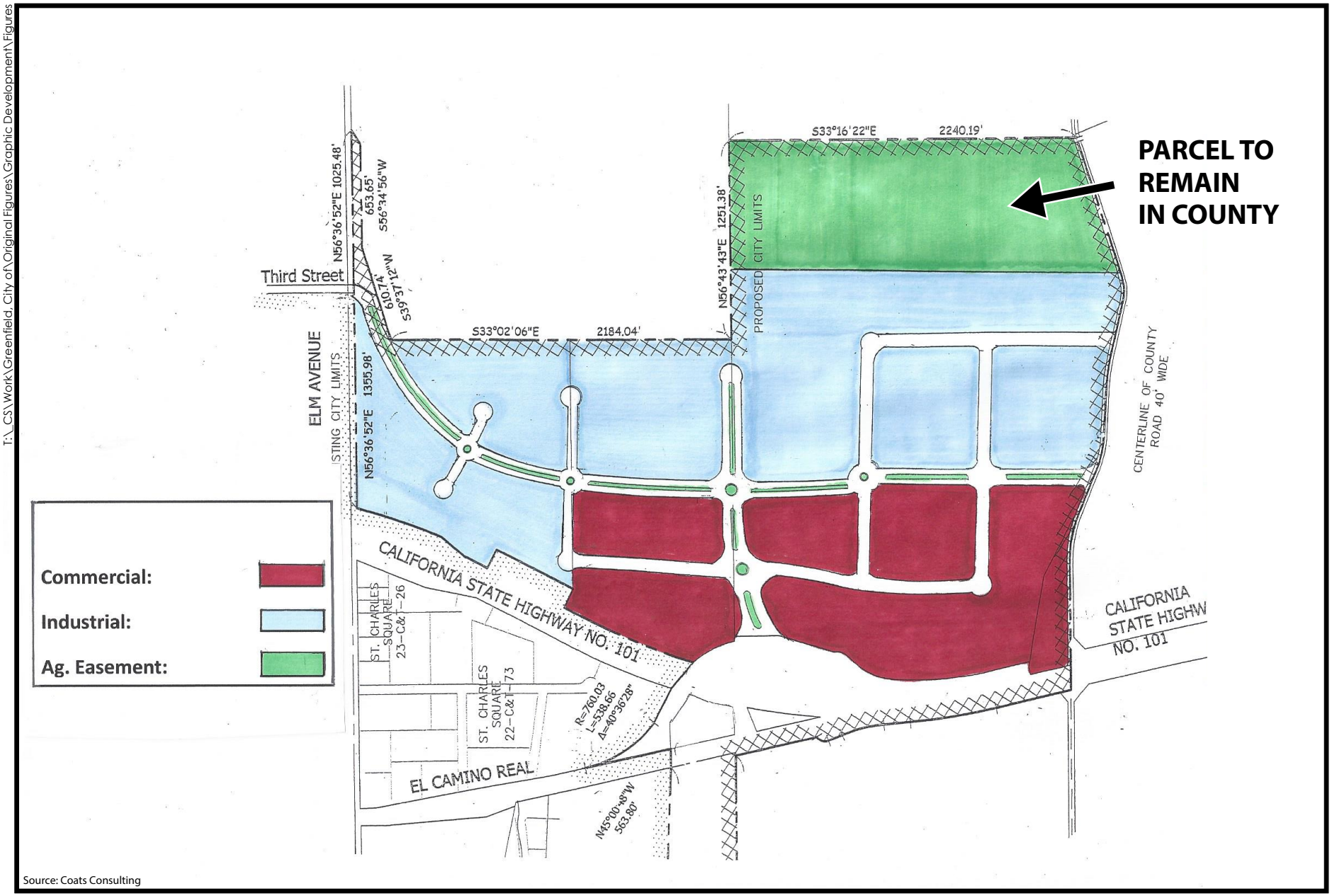
Heavy Industrial/Warehouse Development

The heavy industrial uses would be developed on the eastern portion of the Scheid East and Franscioni parcels, totaling 127 acres. Typical uses anticipated for development within the City's Heavy Industrial designation include processing of agricultural products, major wineries, agricultural support facilities, manufacturing, and similar. For analysis purposes, the EIR (and traffic study) assumes ~~site coverage of 30 percent~~a maximum of 1,074,000 square feet. This also includes an assumption of 24,000 square feet of light industrial use within the industrial mix.

While specific development plans have not yet been proposed, a conceptual roadway network serving the Highway Commercial and Heavy Industrial areas is shown on the Pinnacles Plaza conceptual plan, submitted as part of the annexation request. This roadway network connects to the existing street network at Elm Avenue and Espinosa Road, and connects to ~~Highway~~US 101 at the El Camino Real ramps. The conceptual roadway network is shown ~~as~~in **Figure 2-5,** consistent with the City's Circulation Element.

Low Density Residential Development-Major Subdivision

Low density residential uses are proposed on the Scheid West parcel on the west side of US 101, along the southern boundary of Greenfield High School and Vista Verde School. This designation would allow single-family residential units at up to seven units per acre. Assuming full buildout of the 47-acre parcel at maximum density, the project could conceptually yield up to 329 dwelling units. ~~Actual dwelling unit yield will probably be lower once maps account for roads, detention basins, and easements. For that reason, the traffic study assumes development of 293 units~~ However, as a component of this annexation, the applicant is requesting approval of a tentative subdivision map for 149 single--family dwelling units. The subdivision design includes a 200--foot--wide agricultural buffer easement on its southern boundary, as well as a 70-foot temporary agricultural buffer on the western edge.



Source: Coats Consulting

T:_CS\Work\Greenfield, City of\Original Figures\Graphic Development\Figures

Not To Scale

Figure 2-5

Conceptual Highway Commercial Roadway Network

Michael Baker INTERNATIONAL

Primary roadway access to the subdivision would be via a two-lane road connecting to El Camino Real, running along the south boundary of the Scheid West parcel. Lots range in size from 6,000 square feet to approximately 12,000 square feet~~,~~ and are served by an internal looped street system. The agricultural buffer to the south will serve a dual function as a landscaped drainage swale for stormwater control. Roadway improvements necessary to accommodate project traffic will be constructed with the subdivision.

The Vines tentative subdivision layout is illustrated in **Figure 2-6**.

Traffic and Circulation Improvements

Primary access to the project area would be from Highway 101. East of the highway, access to the project site would be made available via Espinosa Road. The proposed circulation system for the project would include the extension of Third Street through the project area to Espinosa Road (consistent with the Circulation Element), and it is assumed that Espinosa Road would be improved along the southern boundary of the project area. West of the highway, access to the project site would be via El Camino Real/Patricia Lane. Intersection improvements at the south end of the city would also be required, and internal streets for all development areas would also be provided. Parking for employees and customers of the commercial and industrial facilities would be required onsite. Circulation plans for the project are conceptual at this time (with the exception of the residential subdivision, which includes a specific street layout)~~,~~ and ~~All circulation plans for the proposed project~~ would be defined as part of subsequent development proposals, ~~and will be~~ subject to review and approval by the City of Greenfield.

Truck traffic related to industrial and commercial use will have direct access to and from U~~.~~S~~.~~ 101 via Espinosa Road. Alternative truck routes are available around the perimeter of the city consistent with the General Plan and the MOA.

Public Services and Infrastructure

Public service and utilities, including water, wastewater services, gas, electricity, police and fire protection, etc., would be extended from the City to the project site as part of the proposed project. **Section 3.13** of the EIR describes the potential impacts associated with the extension of services to the project area.

Gateway Overlay

Commercial and visitor serving areas that are located at the northern and southern entrances to the community serve as "gateways" to Greenfield. These areas should be aesthetically attractive since they provide an influential visual statement regarding the character of the community. Such areas should be designed to provide visual amenities that are not required for uses designed to serve more local needs. The purpose of the Gateway Overlay is to require the provision of attractive signage, additional landscaping, and greater attention to building design. The gateway overlay is intended to accomplish these purposes. The entire ~~proposed 267-acre project site~~annexation area would be subject to the City's gateway overlay.

Williamson Act Easement Exchange Program and Creation of Permanent Agriculture Easements

To provide direct mitigation for the annexation and development of land currently under Williamson Act contract, the project applicant is~~s are~~ establishing permanent agriculture conservation easements on the 51.6 acre parcel and on other properties to meet California Department of Conservation (DOC) and Monterey County LAFCO requirements consistent with

the MOA. The applicant is pursuing a Williamson Act Easement Exchange Program (WAEEP) pursuant to California Government Code Section 51200 et~~.~~ seq. and the Public Resources Code 10250 et~~.~~ seq.

Lands of Franscioni: The entire 173~~-~~-acre Franscioni (Vanoli Ranch) parcel is currently registered under Williamson Act contract. The owners filed a Notice of Non-Renewal for the entire parcel, which has approximately 10 years remaining on a 20-year non-renewal timeline. Distinct and separate from the non-renewal process, the owners are now also in the process of petitioning for a partial contract cancellation on 121.4 acres of the property, consistent with Government Code Section 51282(a). Of the 173 acres, the 121.4 acres petitioned for cancellation will be annexed. The remaining 51.6 acres will remain in Monterey County. The non-renewal timeline will continue on the 51.6 acres for approximately 10 more years. To mitigate direct impacts of the proposal, the applicant is pursuing the following process steps as part of the project:

- Complete a Williamson Act petition for partial contract cancellation to split off the 51.6 acres to remain in Monterey County. The 51.6 acres will remain under Williamson Act contract during the ongoing non-renewal period and ultimately be placed in a permanent agricultural~~e~~ conservation easement. This process requires that the County of Monterey and the City of Greenfield ~~to~~ complete CEQA review, make certain findings, and accept the petition application as complete.

- Dedicate a permanent agricultural conservation easement on other lands of equal or higher agricultural quality held by the owner. The owner has identified other lands including the Somavia Ranch (66 acres) and Redding Ranch (318 acres) totaling 384 acres for this purpose.

- Complete the WAEEP process including all easements and agreements with the Department of Conservation, County of Monterey, and Monterey County Ag Land Trust (formerly the Monterey County Agricultural and Historical Land Conservancy) to formally establish such easements and amend status of Williamson Act contracts. The process of partially cancelling the Williamson Act contract and establishing mitigation easements is being accomplished by the petitioner with the guidance and direction of the California Department of Conservation and the County of Monterey.

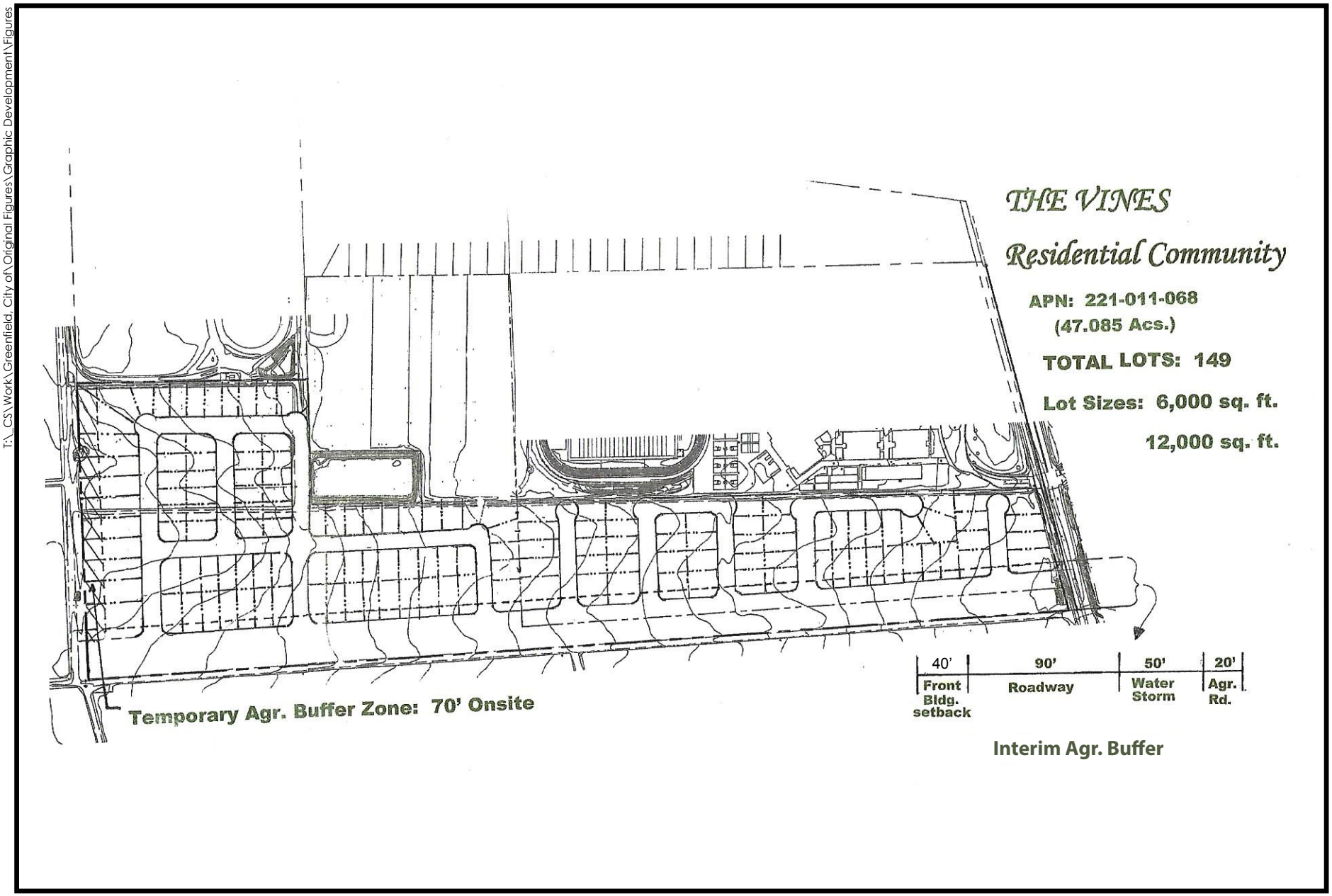
The applicant has proposed two possible scenarios in lieu of paying a contract cancellation fee and to mitigate for the loss of farmland, consistent with the WAEEP process: ~~:~~

Proposal #1: Under this proposal, of the 435.48 acres of land that ~~is~~are to be placed in agricultural conservation easements, a total of 129.6 acres, including Parcel 2 on Vanoli Ranch (51.6 acres) and a 78~~-~~-acre portion of Redding Ranch, would be counted in lieu of paying the cancellation fee. The value of this acreage is approximately $300,000 (Vanoli) and $250,000 (Redding) for a total of approximately $550,000, which is greater than the $450,000 cancellation fee. The remaining 305.88 acres would serve as mitigation to directly offset the loss and conversion of 121.4 acres of agricultural land.

Proposal #2: Under this proposal, of the 435.48 acres of land that ~~is~~are to be placed in agricultural conservation easements, a 159~~-~~-acre portion of Redding Ranch (about half of the parcel)~~,~~ would be counted in lieu of paying the cancellation fee. The value of this acreage is approximately $500,000, which is greater than the $450,000 cancellation fee. The remaining approximately 276.48 acres would serve as mitigation to directly offset the loss and conversion of 121.4 acres of agricultural land.

The DOC, not the City of Greenfield, Monterey County, or LAFCO, will ultimately determine which scenario or combination of measures best satisfies state program requirements.

T:_CS\Work\Greenfield, City of\Original Figures\Graphic Development\Figures



Not To Scale

Figure 2-6
"The Vines" Tentative Subdivision Map

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Lands of Scheid: The Scheid parcels to be annexed (138 acres) are also located on prime farmland. To provide direct mitigation for conversion, the owner will establish a permanent agricultural conservation easement (or easements) on lands of similar or higher agricultural quality and characteristics, consistent with the mitigation requirements of the MOA. The ~~applicant~~owner (Scheid) has identified parcel 221-061-002, located south of the city, as the mitigation parcel. This land (totaling 230 acres) has been placed voluntarily under conservation easement contract for permanent conservation. This parcel, shown in **Figure 2-7**, is not under Williamson Act contract.

County of Monterey Minor Subdivision

As identified previously, the easternmost 51.6 acres of the Franscioni parcel will not be annexed and will remain in ~~the~~Monterey County. In order to provide a legal parcel line and jurisdictional boundaries, the applicant has requested that the County process a minor subdivision to create a separate parcel for the 51.6 acres. This parcel will continue to gain access from Espinosa Road and will remain in active agriculture under County ~~g~~General P~~p~~lan and zoning designations. To ensure that this acreage remains independently viable, a new irrigation well will be constructed on the parcel. No other improvements are proposed. The subdivision map is included as **Figure 2-8**.

Permanent and Interim Agricultural Land Use Buffers

Consistent with the Greater Greenfield Area Memorandum of Agreement (MOA), the annexation area will require permanent and interim buffers to ensure adequate distance between active agriculture and urban land uses. Interim buffers of 70 feet will be provided along the western edge of the Scheid West parcel, on The Vines subdivision. The Scheid West parcel also includes a 200 foot interim buffer on its southern edge. Interim buffers will remain until such time that urban uses are extended and the buffer is no longer needed.

~~the~~ The eastern edge of the annexation area (both Scheid East and Franscioni parcels) ~~are~~is proposed for heavy industrial use. Such use does not involve "areas of active public congregation" or residential use~~,~~ and ~~are~~is therefore considered compatible with adjacent agricultural uses and does not require a buffer. Nonetheless, a voluntary 70-foot no-build buffer will be provided along this eastern side of the annexation area. A permanent buffer of 10 feet along Espinosa Road, involving a permanent conservation easement, is required along the southern boundary of the remaining Franscioni parcel. Existing non-residential structures (such as the L.A. Hearne building) will be buffered by Espinosa Road, which is appropriate considering existing conditions and agriculture-related uses at this location. A 1-foot utility easement will be included along the L.A. Hearne parcel.

2.~~6~~5 PROJECT PHASING

The proposed project has been analyzed for potential development in two primary phases. The purpose of the phasing concept is to determine the thresholds for key traffic and infrastructure improvements, rather than to establish a development sequence. The project applicants have also indicated that future development phasing may be broken down further based upon market demand and uses proposed. The phasing concept to does not preclude or constrain the timing of the development of any of the subject parcels.

PHASE I "INTERIM" DEVELOPMENT

Phase I of the proposed project involves the development of up to a maximum of ~~329~~ 149 single-family residential units on the western side of the project and would also include the development of the entire Highway Commercial area on the east side of the project. Although the uses for the highway commercial portion of Phase I have not been confirmed, the project applicant has conceptually proposed travel-oriented uses including ~~a truck stop and~~ multiple pads suited for commercial/freeway oriented service providers (fast food, restaurant, service station and hotel/motel). Phase I also assumes development of approximately 10 acres of "mini storage," or general industrial warehouse storage.

PHASE II - "BUILDOUT"

Phase II involves the balance (approximately ~~83~~ 127 acres) of the heavy industrial/warehouse land uses on the east side of Highway 101. At this time, the project applicant has~~s have~~ not determined what type of industrial uses would be included within Phase II. For analysis purposes, the EIR assumes maximum site coverage of heavy industrial use.

It is assumed that the proposed project site area would be fully developed within approximately 10~~-20~~ years, with planning and processing occurring within five years. The longer time horizon associated with Phase II reflects the mutual goal of the city and the applicant to provide coordinated planning for the only large industrial parcels in the General Plan. Annexation of the entire territory at this time will allow for cohesive planning on several parcels in different ownership. As stated previously, the purpose of the phasing was to identify the need for key infrastructure improvements, and does not necessarily dictate the development sequence of the parcels. The surveyed annexation map is shown as **Figure 2-9**.

2.~~7~~6 PROJECT OBJECTIVES

Consistent with CEQA Guidelines Section 15124(b), a clear statement of objectives and the underlying purpose of the project shall be discussed. The following description of the project objectives is based on information provided by the project applicant and the City of Greenfield.

The principal objectives of the South End ~~Sphere of Influence and General Plan Amendment~~Annexation project are as follows:

1) ~~Sphere of Influence Amendment, General Plan Amendment and subsequent~~ A~~a~~nnexation and prezoning of approximately ~~267~~ 290 acres, and extension of necessary services in accordance with LAFCO policy.~~;~~

2) ~~To e~~Establish the land use, environmental, and processing framework for the planned development of residential uses, highway commercial uses, and heavy industrial uses consistent with the Greenfield General Plan.~~;~~

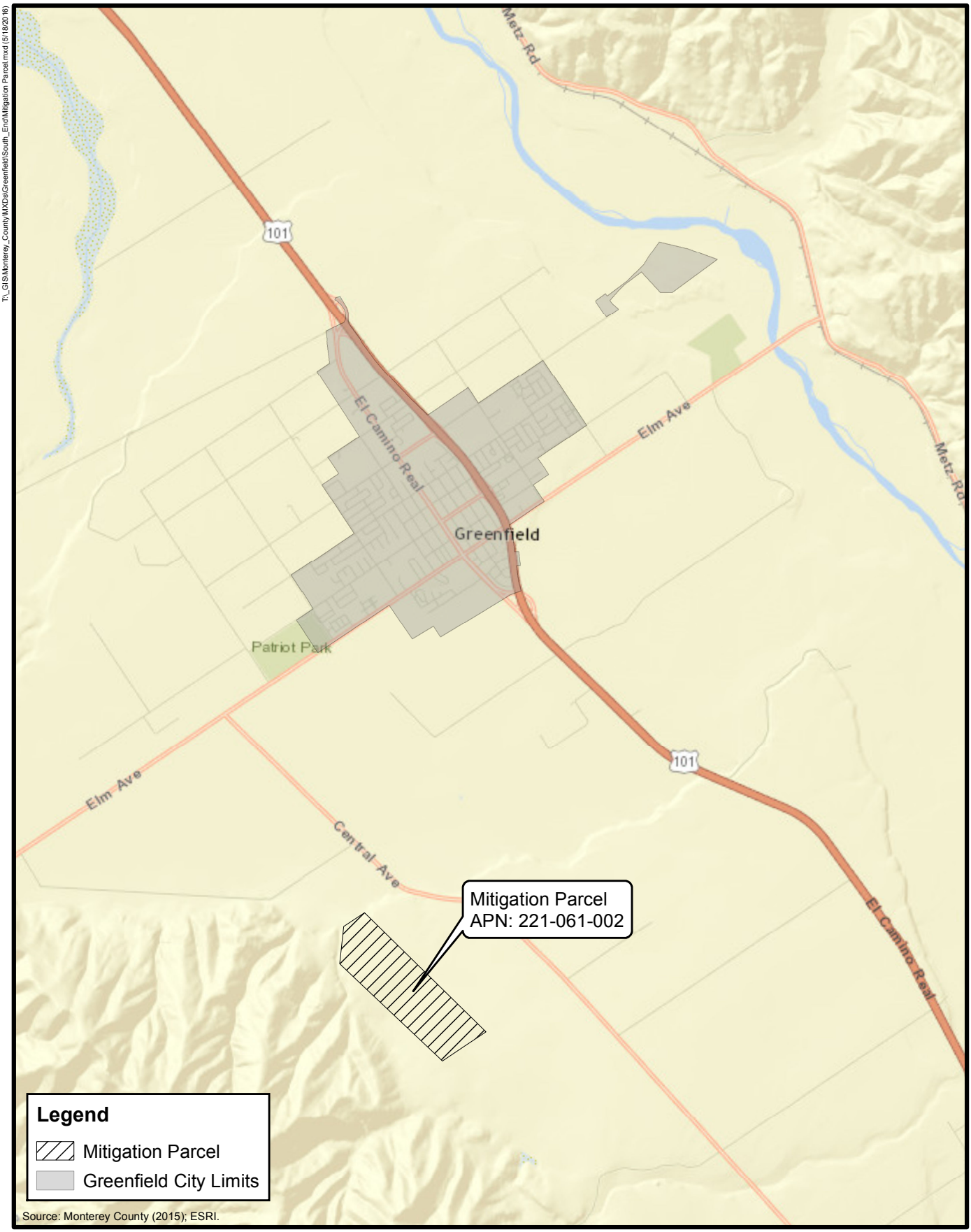
3) Contribute to the enhancement of the southern gateway entrance into the City of Greenfield. Enhance the character of the southern portion of the city by providing a transition between the surrounding fields and vineyards and the city.

4) Establish an industrial based job market in the southern portion of the city, an identified desire of the City.

5) ~~To c~~Create a "move--up" single-family residential neighborhood that would buffer the existing schools in the southern portion of the city from agricultural uses.

6) Create a well-designed, functional revenue generating highway commercial travel center. The travel center would accommodate truck parking, restaurants, and highway commercial type of uses.

T:_GIS\Monterey_County\MXDs\Greenfield\South_End\Mitigation Parcel.mxd (5/18/2016)



Source: Monterey County (2015); ESRI.

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Figure 2-7

Scheid Agricultural Mitigation Parcel

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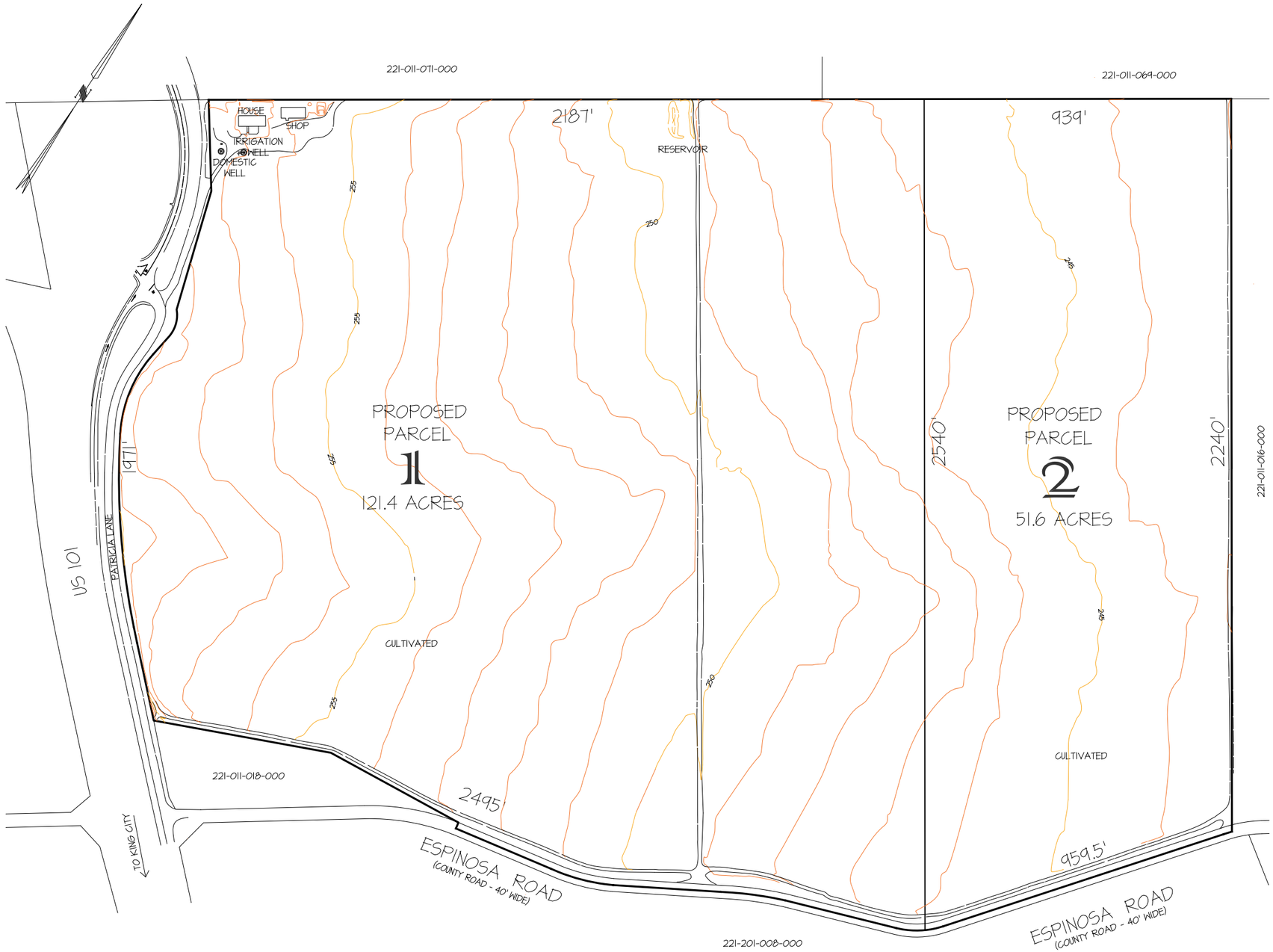

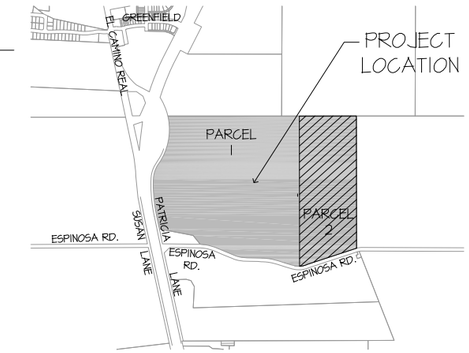

GRAPHIC SCALE

0 300' 700'

150' 450'

OWNER/APPLICANT: TMV LAND COMPANY, LP
86 MONTEREY SALINAS HIGHWAY
SALINAS, CA 93908

ENGINEERS: HD PETERS COMPANY, INC.
119 CENTRAL AVENUE
SALINAS, CA 93901

APN: 221-011-017-000

PRESENT ZONING: F/40

FEMA FLOOD ZONE: ZONE X (LESS THAN 0.2% ANNUAL CHANCE OF FLOOD) PER FIRM MAP No. 06053C0850G
EFFECTIVIE DATE: APRIL 2, 2009

PRESENT LAND USE: FARMLAND 40-160 ACRES MINIMUM

PARCEL 1 NO CHANGE IN USE, F/40 ZONING

WATER: WELL (EXISTING)
SEWER: SEPTIC TANK (EXISTING)
ELECTRIC SERVICE: PACIFIC GAS & ELECTRIC COMPANY, INC .(EXISTING)
TELEPHONE: AT&T COMMUNICATIONS (EXISTING)
GARBAGE SERVICE: TRI-CITIES

PARCEL 2 NO CHANGE IN USE, (100% AGRICULTURAL)
F/40 ZONING AND UNDER WILLIAMSON ACT
AGRICULTURAL EASEMENT DESIGNATION.

ELECTRIC PACIFIC GAS & ELECTRIC COMPANY, INC (EXISTING)

Source: H.D. Peters Co.

FIGURE 2-8
Vanoli Ranch Tentative Subdivision Map

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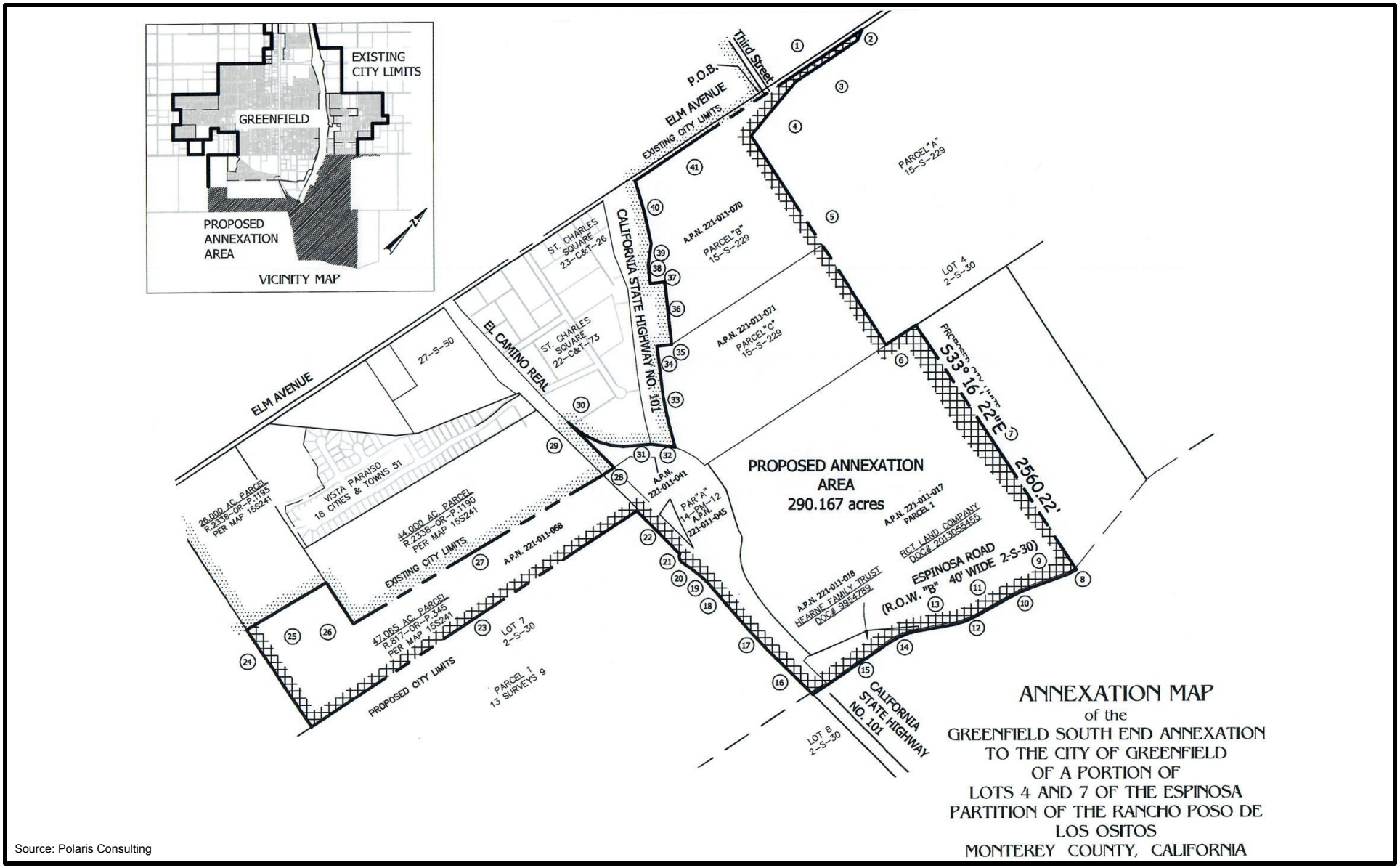

Source: Polaris Consulting

Not To Scale

FIGURE 2-9
Annexation Map

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2.~~8~~7 REQUESTED ACTIONS, ENTITLEMENTS, AND REQUIRED APPROVALS

This Supplemental EIR provides the environmental information, analysis, and primary CEQA documentation necessary for the City, Monterey County, California Department of ~~and~~Conservation and Monterey County LAFCO to adequately consider the environmental effects of the project.

- The City of Greenfield, as lead agency, will consider the project at the local level. The primary approvals sought at the local level include ~~the SOI Amendment, General Plan amendment,~~prezoning and annexation into the City and approval of the residential subdivision map (vesting tentative map). LAFCO, with approval authority for the ~~SOI amendment and~~ annexation (reorganization), is a responsible agency and would take action on the annexation proposal after the City. ~~on those items~~ The City will need to submit a complete annexation application to LAFCO for review and consideration. Monterey County and the Department of Conservation are responsible agencies with approval authority of the minor subdivision and Williamson Act Exchange proposal, respectively.

Future approvals within the project area, if approved, would require additional site planning and related permits by several agencies, additional CEQA compliance, and other processing steps as necessary. Those steps may include, but are not limited to, the following:

- ~~Residential~~ Subdivision Maps (including Monterey County minor subdivision of the Franscioni parcel);
- Tentative Cancellation Resolution (Monterey County, for Williamson Act contract cancellation);
- City/County Tax Sharing Agreement;
- Parcel Maps;
- Site Development Plans;
- Circulation Plans;
- All Final Improvement Plans;
- Utility Plans;
- Construction Phasing and Duration;
- Architectural and Site Plan Review;
- Landscaping and Lighting Plans;
- Development Agreements;
- Williamson Act Easement Exchange Program and Recordation of Permanent Agricultural Conservation Easements (California DOC and Ag Land Trust);
- Caltrans approvals and permits for encroachment and improvements relative to US Highway 101;

- Conditional Use Permits;
- Grading and Building Permits; and/or
- Other related subsequent actions to further project implementation.

REFERENCES/DOCUMENTATION

City of Greenfield. City of Greenfield General Plan and EIR. 2005.

City of Greenfield. *City of Greenfield Zoning Ordinance.* 1981 as updated.

City of Greenfield. South End SOI Final EIR. August 2006.

City of Greenfield. Notice of Preparation for a Draft Environmental Impact Report. October 2005.

Coats Consulting, and the Law Offices of Aaron P. Johnson. Project description, information and plans.

County of Monterey. Central Salinas Valley Area Plan. 1987.

County of Monterey. Monterey County General Plan. 1982

H.D. Peters and Co. Tentative Parcel Map for proposed minor subdivision of the TMV Land Company, LP. May 2016.

Monterey County LAFCO. Resolution No. 13-13, Greater Greenfield Area Memorandum of Agreement. June 24, 2013.

3.0 ANALYSIS

3.1 ANALYSIS APPROACH

This document is a Supplemental EIR (SEIR). As such, it provides supplemental information to the South End Sphere of Influence (SOI) Amendment Project Final EIR certified by the City of Greenfield in August 2006, consistent with CEQA Guidelines Section 15163 (see Section 1.0). Based on a series of minor changes to the original project description (see Section 2.0) and changes in local circumstances surrounding the proposal, this document provides a comparative analysis of the current application against the prior project. This SEIR provides a section-by-section comparison of the adequacy and relevance of the findings of the certified CEQA document against the current proposal and the physical and policy setting in place today.

This document is not nor is it intended to provide a wholesale re-evaluation of the previously certified EIR. Rather, it makes supportable findings as to the adequacy of the prior analysis and provides additional analysis, findings, and/or mitigation measures as warranted that are applicable to the current proposal. A master of list of all applicable mitigation measures from the prior EIR and this SEIR is included as **Appendix A**.

For purposes of discussion and analysis, the South End SOI Final EIR certified in August 2006 is referred to as the "previously certified EIR" or the "prior EIR." The prior EIR is incorporated by reference in its entirety and is included as **Appendix F**.

3.1 AESTHETICS AND VISUAL RESOURCES

Current Environmental Setting

The environmental setting of the project area has not significantly changed, based on field review by the EIR preparers familiar with current conditions and conditions in 2006. The subject parcels remain in active agriculture, and no major improvements to the area have been introduced. The characterization of the setting and dominant visual features as documented in 2006 remains essentially unchanged. Uses on the Scheid East Industrial parcel also remain in agricultural use. This parcel does not introduce any new or unique visual features to the environmental setting. Open views and vistas across existing farmland remain.

Comparative Analysis

The previously certified EIR identified the following environmental effects and their relative significance:

- Impact 3.1-1 Aesthetic and Visual Character (less than significant)
- Impact 3.1-2 Existing Views and Scenic Vistas (less than significant)
- Impact 3.1-3 Light and Glare (potentially significant)
- Impact 3.1-4 Visual Appearance of the Built Environment (potentially significant)
- Impact 3.1-5 Cumulative Impact to Scenic Resources and Visual Character (significant and unavoidable)

Regarding the project's less than significant impacts, no components of the current project description would change those conclusions from the prior EIR. The visual environmental setting remains similar, and changes to visual character, views, and vistas—at the project level—would

occur in the same manner but would not exceed established thresholds for the reasons previously documented.

With respect to light and glare, a mitigation measure was included requiring lighting plans to be submitted to the City for review at the time detailed development plans were proposed, showing lighting features intended to minimize glare and off-site light spillage. This measure remains applicable to all parcels, including the proposed residential subdivision on the Scheid West parcel.

With respect to visual appearance of the built environment, the prior EIR also identified proposed residential and commercial areas within the annexation area that would be in City-designated Gateway Overlay areas. The Greenfield General Plan states that proposed development within these areas should visually complement the surrounding agricultural area. The aesthetics analysis stated that development within these areas, without design controls, could result in aesthetic impacts that would be inconsistent with the surrounding agricultural area. Mitigation measures were included requiring detailed project and landscape plans to be submitted for review by the City to determine consistency with the Gateway Overlay areas, as well as requiring undergrounding of utilities in these areas. These measures remain applicable and relevant to the current proposal.

Conclusion

Based on the proposed land uses and an inspection of current site conditions and resources, there are no changes to the project that would alter the analysis and conclusions of this section of the prior EIR, and the mitigation measures remain adequate. Cumulative effects would also remain significant and unavoidable as documented in the prior EIR. The minor subdivision component of the project would have no impact on the environment, as the 51.6 acres of Vanoli Ranch previously proposed for annexation will now remain in agricultural use.

3.2 AGRICULTURAL RESOURCES

Current Environmental Setting

The physical conditions and quality of farmland in the project area remain unchanged from 2006 conditions. As with most of Greenfield and with few exceptions, the subject parcels and the surrounding area consist of Prime Farmland with excellent agricultural characteristics that have traditionally supported row and truck crops such as lettuce, broccoli, celery, and cauliflower. Rockier soils have successfully supported vineyards and orchards.

Based on the current project description, however, there are key differences in the proposed project that relate to agricultural resources. These include:

> **Total Acreage**. The prior EIR analyzed a project size of 267 acres that had the potential to be converted to urban use. The current proposal involves 340 acres with the inclusion of the Scheid East Industrial parcel. However, because 51.6 acres of the Franscioni parcel will remain in Monterey County under a permanent agricultural easement, the net acreage of affected property is 290 acres (see Section 2.0 for details). Approximately 32 acres of this net area consists of existing roadways, existing businesses, and other nonproductive lands, resulting in 258 acres of farmed land that could be impacted.
>
> **Greater Greenfield Area Memorandum of Agreement (MOA)**. As described in Section 1.0, this MOA, executed in June 2013, provides specific guidance and expectations regarding the long-term direction of growth for the city, mitigation strategies for the conversion of

agricultural land, performance standards for agricultural buffers, and other policy considerations. While the MOA did not exist at the time of certification of the prior EIR, the current proposal must demonstrate consistency with the document and with other current LAFCO policies.

Treatment of Franscioni Parcel/Proposed WAEEP. Based on the current proposal, the 173-acre Franscioni parcel includes a tentative parcel map (minor subdivision), to be processed by the County of Monterey. The purpose of this subdivision is to allow the easternmost 51.6 acres of the property to remain under County jurisdiction, with a Farmlands land use designation and permanent protection as part of a larger mitigation strategy. As described in Section 2.0, Project Description, the property owners are pursuing a Williamson Act contract cancellation for 121.4 acres of the parcel through the Williamson Act Easement Exchange Program (WAEEP). The owners propose to mitigate for the partial cancellation of the existing contract, and annex the 121.4 acres for future development. The remaining 51.6 acres will remain under contract and in the non-renewal process for approximately 10 more years. The treatment of this parcel—Vanoli Ranch—represents a deviation from the 2006 project description, which anticipated annexation of the remaining 51.6 acres into the City of Greenfield. Annexation of this property is no longer proposed. The WAEEP process was not anticipated in 2006 and must be addressed in this SEIR.

Comparative Analysis

The previously certified EIR identified the following impacts related to agricultural resources:

- Impact 3.2-1 Conversion of Prime Farmland (significant and unavoidable)
- Impact 3.2-2 Agricultural-Urban Land Use Conflicts (potentially significant)
- Impact 3.2.3 Agricultural Zoning and Williamson Act Contracts (significant)
- Impact 3.2-4 Cumulative Loss of Farmland (significant and unavoidable)

Each of these impacts, as related to the current proposal, is addressed below.

<u>Conversion of Prime Farmland</u>

With the execution and implementation of the City/County/LAFCO MOA, mitigation strategies for the conversion of farmland now exist for the South End Annexation that did not exist in 2006. Specifically, as set forth in the MOA [paraphrased here], the City agrees to consider adoption of an agricultural land mitigation program if the County adopts such a program, but only if the Cities of Gonzales, King City, Salinas, and Soledad also adopt such a program. Until such time as the program has been established [and at this time, no program has been established by the County or any of the other South County communities], the City will mitigate the loss of agricultural land on an individual basis, to the extent feasible as determined through a CEQA review and assessment process. Appropriate mitigation measures include measures that secure the voluntary dedication of easements, payment of a mitigation fee to be used to purchase easements through a mitigation bank, or other equally effective mechanisms that mitigate for the loss of Important Farmland. In the case of easements, the developer is required to obtain a permanent conservation easement on a 1:1 basis per acre converted. The MOA also identifies site-specific mitigation requirements for annexation and development of the Franscioni property, including

establishment of a permanent conservation easement on the easternmost 51.6 acres and off-site easements, discussed further below.

For the Franscioni property, the parcel is also in the process of a Williamson Act contract cancellation (consistent with 2006 conditions), while the owners are working with the California Department of Conservation, Monterey County, and the Monterey County Agricultural and Historical Land Conservancy (now known as the Ag Land Trust) to establish permanent agricultural easements on approximately 435 acres. This is occurring as part of a Williamson Act Easement Exchange Program being pursued independently by the applicant. These easements are described as part of the project description (see Section 2.0) and discussed in detail elsewhere in this section of the SEIR.

The South End Annexation project as a whole will result in the conversion of 259 acres of prime or important farmland to urban uses, as shown in **Table 3.2-1**.

TABLE 3.2-1
AGRICULTURAL LAND TO BE CONVERTED TO NONAGRICULTURAL USE (ACREAGES ROUNDED)

Parcel	Acreage
Vanoli Ranch (Franscioni)	121
Scheid West	47
Scheid East	45
Scheid East Industrial	46
Total	**259**

TABLE 3.2-2
AGRICULTURAL LAND TO BE PLACED IN PERMANENT CONSERVATION EASEMENTS (ACREAGE ROUNDED)

Parcel	Acreage
Somavia Ranch	66
Redding Ranch	318
Scheid Mitigation Parcel	230
Total	**614**

As shown in Tables 3.2-1 and 3.2-2, the project as a whole will result in 614 acres of farmland placed in permanent agricultural conservation easements versus 259 acres to be converted following annexation, which represents a ratio of 2.38 to 1. These figures do not include the 51.6 acres of Vanoli Ranch, which will remain in Monterey County and are not factored into the calculation. In addition, conservation easements to be used as mitigation under CEQA, versus easements used to offset in-lieu contract cancellation fees, are further analyzed and differentiated later in this section.

From the perspective of CEQA compliance and consistent with the provisions of the MOA (which requires farmland conversion mitigation at a 1:1 ratio), the quantity of land to be converted is fully mitigated by the quantity of land to be placed into conservation easements. This impact is **less**

than significant as mitigated by the proposed easements and with implementation of the mitigation measures of this section.

Agricultural/Urban Land Use Conflicts

With respect to permanent and interim agricultural buffers, the prior EIR required a 100-foot setback between urban and agricultural land uses, and a 200-foot setback along the city's eastern edge at 2nd Street.

The MOA, which now provides more specific guidance on agricultural buffers, is now applicable to the South End Annexation. The MOA seeks to establish a City/County interim buffer program, in consultation with the Monterey County Agricultural Commissioner's office, for areas in transition from agricultural to urban uses. As of the date of this SEIR, the City of Greenfield has drafted an Interim Agricultural Buffer Program and has done so in consultation with the agencies mentioned above. The program requires the City to consult with the Agricultural Commissioner's Office on a case-by-case basis when establishing interim buffers associated with future annexations. This approach is consistent with the MOA.

For parcels to be annexed east of US Highway 101 (US 101), the commercial and industrial uses proposed do not include "residential, public uses, or areas of active public congregation" within 200 feet of agricultural land. Areas of active public congregation per the MOA specifically do not include industrial uses, which are deemed compatible with agricultural uses. For this reason, no specific buffer widths are required of the project along the city's eastern or southern edges east of the highway. Nonetheless, the applicant has agreed to place a 70-foot no-build buffer along the eastern edge of the project.

West of US 101, the Scheid West parcel proposed for residential subdivision is subject to the interim and permanent agricultural buffer policies of the City and the MOA. In response to the MOA, the subdivision site plan has established a permanent 200-foot buffer on the project's southern edge and a temporary 70-foot buffer along the project's western edge (see Section 2.0, Project Description). The 70-foot buffer temporary buffer is on the applicant's property and intended to provide separation to new residential areas in the near term, while allowing potential development to occur in the future consistent with the General Plan. If and when areas to the west convert from agriculture to urban uses, the temporary buffer will no longer be necessary. The 70-foot setback buffer, together with the adjacent roadway, provides a buffer of over 110 feet.

With implementation of the proposed permanent and interim buffers and the mitigation measures identified in this section, agricultural/urban conflicts will be mitigated to a **less than significant** level.

Agricultural Zoning and Williamson Act Contracts

As discussed previously in this section and as identified in the Project Description, the 173-acre Franscioni Parcel (Vanoli Ranch) is the only parcel in the South End Annexation project encumbered by a Williamson Act Agricultural Preserve Land Conservation Contract (Ag P LCC No. 73-9). The applicant filed an owner-initialed Notice of Nonrenewal of this contract in 2004 (recorded in 2006). Per the Notice of Nonrenewal, the existing contract would expire on December 31, 2026. Distinct and separate from the non-renewal process, the owners are now also in the process of petitioning for a partial contract cancellation on the 121.6 acres to be annexed, to make it possible for planning and development on this parcel to occur prior to the expiration date.

The applicant has submitted a Tentative Parcel Map and a Petition to Cancel a Williamson Act Contract. The Tentative Parcel Map (a minor subdivision to be processed by Monterey County) would divide the Franscioni Parcel into a 121.4-acre parcel (Parcel 1) that would be annexed to the City of Greenfield and a 51.6-acre parcel (Parcel 2) that would remain under Williamson Act contract and would have an agricultural easement placed on it (see Section 2.0, Project Description). The non-renewal timeline would continue to run on the 51.6 acres.

The Petition to Cancel a Williamson Act Contract is for Parcel 1, the territory that would be annexed into the City of Greenfield. The cancellation is being proposed as a step toward placing Parcel 2 (as well as two other properties) under permanent agricultural conservation easements. These easements would be established through the Williamson Act Easement Exchange Program (WAEEP) administered by the California Department of Conservation (DOC). The easements would be managed by the Agricultural Land Trust of Monterey County (Land Trust). In addition to the 51.6-acre Parcel 2, the other two properties proposed for easements include:

Somavia Ranch (APN 137-151-009). This property consists of 66.09 acres located northeast of the intersection of Somavia Road and US 101 between Salinas and Chualar. This property is actively farmed in row crops.

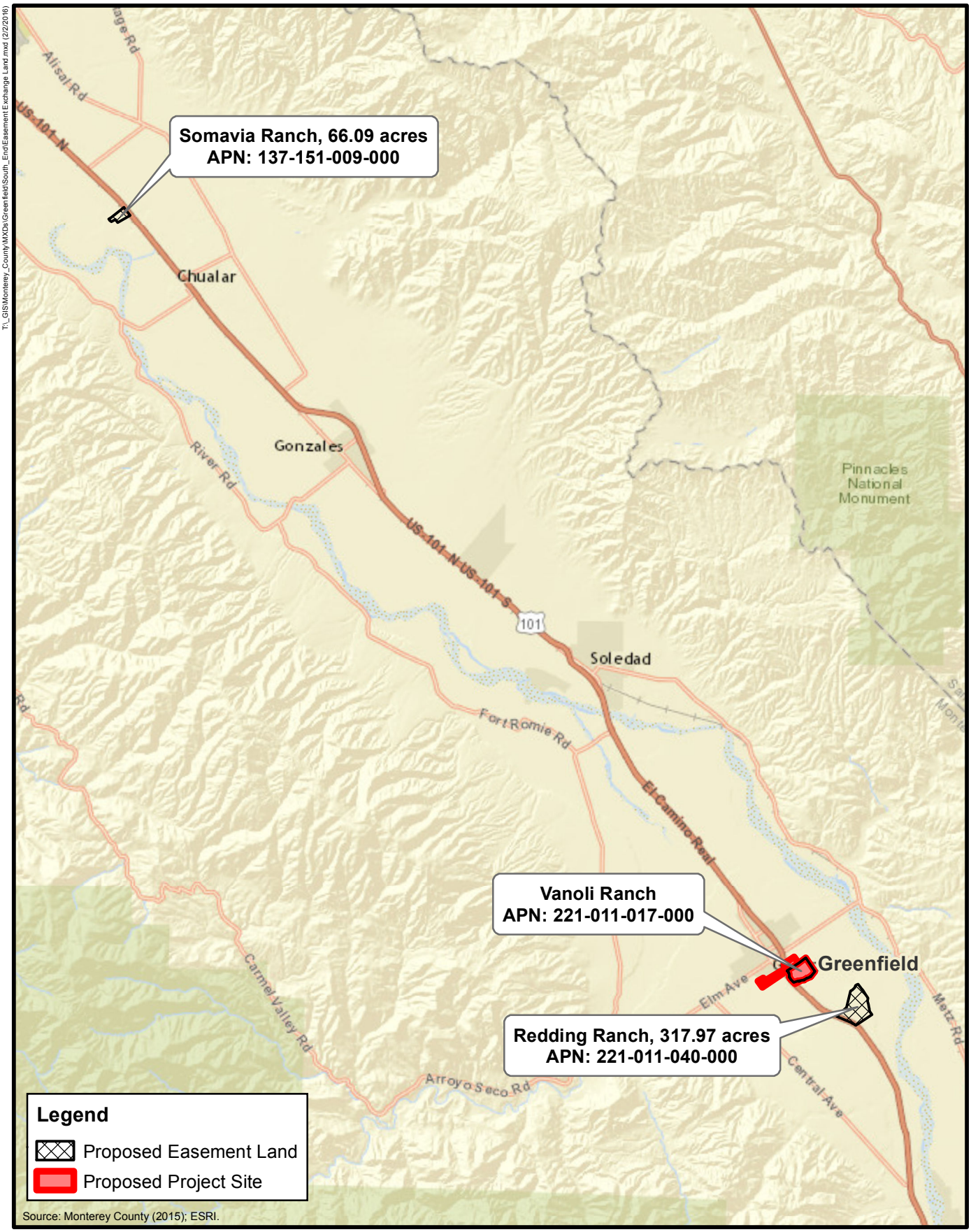
Redding Ranch (APN 221-011-040). This property consists of 317.97 acres located southeast of the intersection of Underwood Road and US 101, south of Greenfield. This property is also currently actively farmed with row crops.

Table 3.2-3 provides a summary of the properties involved in the WAEEP.

TABLE 3.2-3
PROPERTIES INVOLVED IN THE PROPOSED WAEEP

	Somavia Ranch	Vanoli Ranch	Redding Ranch	Totals
Contract No.	n/a	Ag P LLC No. 73-9	n/a	
APN(s)	137-151-009	221-011-017	221-001-040	
FMMP Classification	Farmland of Statewide Importance	Prime Farmland	Prime Farmland	
Existing Zoning	HI/B-5 60 AC	F/40	F/40	
Total Acreage	66.09	173	317.97	557.06
Acres to be removed from contract through cancellation	0	121.4	0	121.4
Acres to be annexed/value	0	121.4/$3.6M	0	121.4
Acres to be entered into a permanent ag easement/value	66.09 acres/ $0.2M	51.6 acres/ $0.3M	317.79 acres/ $1.0 M	435.48 acres

Figure 3.2-1 illustrates the relative location of the all parcels that are subject to the WAEEP.



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0 1 2
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Figure 3.2-1

Lands Proposed for Williamson Act Easement Exchange

Michael Baker
INTERNATIONAL

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Under the WAEEP, a Williamson Act contract being cancelled is exchanged for a permanent agricultural easement in lieu of monetary payment of the cancellation fee. The easement must have a monetary value equal to or more than the amount of the cancellation fee. In addition, the easement land must be of the same size or larger than the land under contract. The cancellation fee is 125 percent of the value of the 121.4 acres proposed for cancellation, or approximately $450,000. The lands placed under easement through the WAEEP process are in lieu of paying a cancellation fee to the State only, and cannot be considered as mitigation for the physical conversion of farmland. As described in Section 2.0, a portion of the 434.26 acres to be placed in permanent agricultural easements would be used in lieu of paying the approximately $450,000 cancellation fee, and the remaining acreage would be used as mitigation for the physical loss of farmland. To accomplish these goals, the applicant has proposed two alternative scenarios:

> **Proposal #1**: Under this proposal, of the 435.48 acres of land that are to be placed in agricultural conservation easements, a total of 129.6 acres, including Parcel 2 on Vanoli Ranch (51.6 acres) and a 78-acre portion of Redding Ranch, would be counted in lieu of paying the cancellation fee. The value of this acreage is approximately $300,000 (Vanoli) and $250,000 (Redding) for a total of approximately $550,000, which is greater than the $450,000 cancellation fee. The remaining 305.88 acres would serve as mitigation to directly offset the loss and conversion of 121.4 acres of agricultural land.
>
> **Proposal #2**: Under this proposal, of the 435.48 acres of land that are to be placed in agricultural conservation easements, a 159-acre portion of Redding Ranch (about half of the parcel) would be counted in lieu of paying the cancellation fee. The value of this acreage is approximately $500,000, which is greater than the $450,000 cancellation fee. The remaining approximately 276.48 acres would serve as mitigation to directly offset the loss and conversion of 121.4 acres of agricultural land.

The City of Greenfield recognizes that successful completion of the WAEEP addresses the direct conversion impacts associated with cancellation of the contract on the 121.4 acres and offsets the cancellation fees that would normally be required. The applicant's draft petition and supporting documentation is included as **Appendix C** to this SEIR.

The qualified easement lands proposed are required to meet certain criteria. Specifically, according to the Government Code Section 51256, the applicant must find easement areas that:

- Are the same size or larger than the Williamson Act contracted area proposed for cancellation;
- Have the same dollar value or greater than the cancellation fee required to cancel Williamson Act contract;
- Substantially meet the easement elements required in Public Resources Code Sections 10251 and 10252;
- Appear to be without title impediments; and
- Are demonstrated in a preliminary manner to not have boundary or other disputes.

According to the Department of Conservation's guidance documents (*Navigating the Williamson Act Easement Exchange Program Process, A Step by Step Guide*, November 2014), the City must make a CEQA determination for all Williamson Act contract cancellations. Contract cancellations of 100 acres or more are deemed to be projects of statewide, regional, or area-wide importance. This SEIR treats the issue consistent with these requirements by documenting the WAEEP process and analyzing the physical environmental impacts of contract cancellation and ultimately conversion of farmland.

The City of Greenfield, County of Monterey, and WAEEP applicant make the following findings pursuant to Government Code Section 51282 for the cancellation process:

Finding 1. The cancellation is for land on which a notice of nonrenewal has been served pursuant to Section 51245 of the Government Code.

Evidence:

See Appendix C, Exhibit 4, Petition to Cancel – Vanoli Ranch. An owner-initiated Notice of Nonrenewal for AgP LCC No. 73-9 was recorded with the Monterey County Recorder's Office on September 14, 2006, as Document No. 2006080679. This Notice of Nonrenewal is for the 173 acres (sometimes referred to as "subject property") which are the subject of the Franscioni (sometimes referred to as "Owner' or "applicant") petition for cancellation (Planning File No. PLN150619). The date of partial expiration of AgP LCC No. 73-9 as applicable to the subject 173 acres is December 31, 2026.

Based on the facts stated above, Finding 1 can be made.

Finding 2. The cancellation is not likely to result in the removal of adjacent lands from agricultural use.

Evidence:

See Appendix C, Exhibits 2, 5, and 6 (Memorandum of Agreement, City of Greenfield Annexation Map, Annexation Map with Ag Land Easement). The applicant proposes to cancel a 121.4-acre portion of the property to establish commercial and industrial land uses, while the remaining 51.6 acres would continue to be farmed and subject to AgP LCC No. 73-9. The subject property is currently zoned F-40 (Farmlands-40 acre minimum) n the unincorporated area of Monterey County and is within the City's Sphere of Influence. The specific and unique nature of these 121.4 acres (i.e., the property's soils conditions as well as its proximity to the City of Greenfield and US 101) was the reason the subject property was included in the Greater Greenfield Area Memorandum of Agreement and is part of the City of Greenfield's pending South End Annexation proposal. The remaining 51.6 acres of the Vanoli Ranch located adjacent to and easterly of the 121.4 acres proposed for cancellation are located outside of the City's adopted Sphere of Influence (SOI) and will remain under the jurisdiction of Monterey County. The 51.6 acres will remain under the existing Williamson Act contract if possible or may be placed under a new/amended Williamson Act contract and will be placed in an agricultural conservation easement with the Agricultural Land Trust of Monterey County.

Policy AG-1.3 of the 2010 Monterey County General Plan states that subdivision of Important Farmland which is designated as "Farmland" shall be allowed only for exclusive agricultural purposes. An exception is allowed for community plan areas. The property immediately to the north (Scheid East Parcel) is also included in the City's SOI, a subject of the Greater Greenfield

Area Memorandum of Agreement, and is also a part of the City of Greenfield's South End Annexation proposal. The area farther to the north is already urbanized and located within the City of Greenfield. Adjacent agricultural land to the east and across Espinosa Road to the south is located in Monterey County and is not within the City's adopted SOI. These adjacent areas will remain under active agricultural production. General Plan Policy AG-1.4 states that viable agricultural land uses shall be conserved, enhanced, and expanded through agricultural land use designations and encouragement of large lot agricultural zoning.

Based on the discussion above, City and County staff do not believe that removal of the 121.4-acre portion of the site from contract restrictions will result in removal of adjacent land from agricultural use. Therefore, Finding 2 can be made.

Finding 3. The cancellation is for an alternative use which is consistent with the applicable provisions of the city or county general plan.

Evidence:

See Appendix C, Exhibits 2, 10, and 3 (Memorandum of Agreement, Lee and Pierce Ag Production/Soils Analysis, City of Greenfield General Plan). The 121.4 acres of the Vanoli Ranch that are proposed for partial cancellation of AgP LCC No. 73-9 are being subdivided to accomplish their annexation into the City of Greenfield. The 121.4 acres are "specific" acreage that have been included in the 2013 Memorandum of Agreement between the City of Greenfield, Monterey County, and LAFCO and are within the City of Greenfield's established Sphere of Influence. These 121.4 acres have been included in the City's Sphere of Influence (SOI) because of their immediate proximity to US 101 and the city's southern boundary. Further, the subject property's soil quality provides an inferior agricultural growing environment due to the abundant existence of "Greenfield potatoes" (local term for river rock of potato size), which make farming on the subject property a less desirable and more expensive endeavor due to wear and tear on farming equipment and the extra labor necessary to clear the field of these rocks before and after planting. The subject property has many harvesting issues due to the abundance of potato-sized rocks.

The subject property is located directly adjacent to the North Espinosa Road exit from US Highway 101, which makes the property easily accessible to traffic on the highway. This accessibility also makes the subject property more attractive to develop into commercial property, which would benefit the City of Greenfield and all of the other cities in south Monterey County.

The 121.4 acres when annexed as part of the South End Annexation proposal will be designated for commercial use (60 acres immediately adjacent to US 101) and industrial use for the remainder of the parcel. Because of the easy access from US 101, the City of Greenfield is planning on encouraging business growth in the form of a travel plaza, hotel(s), and restaurants. This would provide services for travelers and encourage visitors to come to visit Pinnacles National Park and the River Road Wine Trail. Increased tourism in this area would provide economic growth and revenues to the City of Greenfield and provide jobs for local residents.

Since the City of Greenfield SOI is contiguous with the city limits being expanded in a manner that reflects the General Plan and future growth that has been addressed by Monterey County, the annexation of the 121.4 acres of Vanoli Ranch will maintain a consistent growth pattern because the land is immediately adjacent to current land that is either currently within the city limits or is being annexed concurrently into the city limits.

Based on these facts and circumstances, the proposed alternate use is consistent with the City of Greenfield General Plan.

Finding 4. The cancellation will not result in discontiguous patterns of urban development.

Evidence:

See Appendix C, Exhibits 10 and 14 (Lee and Pierce Ag Production/Soils Analysis, Vanoli 121.4 Acre Ranch Mitigation Appraisal [Pini] 2015). See also Exhibits 15 and 2 (Vanoli 51.6 acre Ag Easement Appraisal [Petitt] 2015, and Memorandum of Agreement. The 121.4 acres subject to the petition for partial cancellation are located within the City of Greenfield's Sphere of Influence (SOI) approved by LAFCO. The SOI was delineated taking into account factors critical for orderly growth and economic development as required by applicable legislation. The City's boundary and the SOI limit growth in the area surrounding the city and protect agricultural land now and in the future.

The land that is to be annexed into the City of Greenfield has the added cost of growing and harvesting due to the soil type (abundant and reoccurring "Greenfield potatoes"). The value that the subject property will add to the City of Greenfield because of its location and accessibility outweighs the agricultural benefit it currently offers. These are the findings of Monterey County, LAFCO, and the City of Greenfield through their Memorandum of Agreement.

The only adjacent properties that would be involved in the City's annexation process are also included in the City's General Plan, the MOA, and the SOI. Any future city growth that might involve agricultural land would be in accordance with the Monterey County General Plan, City of Greenfield General Plan, and LAFCO procedures and policies.

The 51.6 acres remaining within AgP LCC No. 73-9 are proposed for inclusion within an agricultural conservation easement in conjunction with the proposed annexation and the petition for cancellation of 121.4 acres. The proposed agricultural conservation easement on the 51.6 acres that will remain in the unincorporated area of Monterey County will prevent these remaining 51.6 acres from being removed or converted from agricultural land and developed for nonagricultural uses in the future.

Since the Greenfield SOI is contiguous with the city limits being expanded in a manner that reflects the City's General Plan and future growth that has been addressed by Monterey County, the annexation of the 121.4 acres of the Vanoli Ranch into the city will maintain a consistent growth pattern because the land is immediately adjacent to current land that is either currently within the city limits or being annexed concurrently into the city limits with the subject property.

Finding 5. There is no proximate non-contracted land which is both available and suitable for the use to which it is proposed the contracted land be put, or, development of the contracted land would provide more contiguous patterns of urban development of proximate non-contracted lands.

Evidence:

See Appendix C, Exhibit 2 (Memorandum of Agreement). See also City and County General Plans. City of Greenfield General Plan Figures 2-3 and 2-5 show the city's land use pattern. One of the proposed uses, heavy industrial, is in support of the agricultural industry and is

designated nowhere else on the land use diagram. This makes the proposed cancellation land the only land available for industrial purposes. There are other highway commercial properties available north of Apple Avenue, but they are encumbered by ownership and residential proximity that would limit traveler friendliness. There is also a mixed use overlay, which is not compatible with the proposed commercial use. The parcels south of Espinosa Road adjacent to US 101 are under Williamson Act contract. Therefore, there is no proximate non-contracted land available for this purpose. In addition, these 121.4 acres are "specific and unique" to the City's Sphere of Influence and the MOA which have already been approved by Monterey County, the City of Greenfield, and LAFCO.

The City of Greenfield and the WAEEP applicant make the following findings pursuant to Government Code (GC) Section 51256:

Finding 1 (GC Section 51256a). The proposed agricultural conservation easement is consistent with the criteria set forth in Section 10251 of the Public Resources Code (eligibility).

Evidence:

(a) *Parcel size and continued production*. The WAEEP conservation parcels are 317.97 acres and 66.09 acres, respectively. These parcels are of ample size to continue sustained agricultural production. In addition, the 51.6 acres subdivided from the Vanoli Ranch are surrounded by active agriculture and large enough to sustain commercial agriculture. The land in all cases is surrounded by similar commercial agriculture practice and supporting infrastructure and support services of the Salinas Valley adjacent to US Highway 101.

(b) *General Plan's commitment to agricultural land conservation*. The Greenfield General Plan contains multiple policies reflecting the City's continued commitment to agriculture and the agricultural industry. The land use diagram focuses on a compact urban development pattern intended to preserve larger tracts of agriculture around the city's edges. The ultimate SOI boundary adopted by LAFCO similarly guides the pattern of urban development and provides a clear boundary intended to product the viability of agriculture. The City's General Plan contains a subsection in the Land Use Element committed to agricultural resource protection, including Goal 2.6 (and related policies) with the intent to "preserve and protect the viability of agricultural areas surrounding Greenfield and within the Planning Area while promoting planned, sustainable growth."

(c) *Without conservation the land proposed for protection is likely to be converted in the foreseeable future*. The Somavia Ranch is in very close proximity to Chualar, which is one of the county's future growth areas. Somavia Ranch also has a County land use designation of Heavy Industrial (HI), which would allow future development without the conservation easement. Similarly, the 51.6 acres to be protected at Vanoli Ranch would face greater development pressure from adjacent projects if not part of the conservation program.

Finding 2 (GC Section 51256b). The proposed agricultural conservation easement is consistent with the criteria set forth in Section 10252 (a, c, e, f, and h) of the Public Resources Code (director's review).

Evidence:

(a) *Quality of the land*. The quality of the land to be conserved is equal in quality and production capabilities, based on production and value data compiled for the application (see SEIR Appendix C, Lee and Pierce Ag Production/Soils Analysis).

(c) *Local agency long term commitment to agricultural land conservation*. The City and County General Plans are committed to long-term preservation of agricultural lands, and agriculture is recognized as one of the local pillars of the local economy. See 10251(b) above. Similarly, the City/County/LAFCO MOA establishes very specific preservation criteria related to Greenfield and this project. LAFCO and the City follow California Environmental Quality Act (CEQA) procedures related to the identification of impacts and mitigation for impacts to farmland, as evidenced in this SEIR. The region has a very active local conservation entity, the Ag Land Trust. The City employs an effective right to farm ordinance as a mitigation measure on new development located in proximity to ongoing agriculture. The City of Greenfield actively encourages and supports economic strategies and agricultural enterprise, as evidenced by City support for ag-related businesses, farmworkers, and land uses (Artisan Agriculture) in the General Plan.

(e) *Location.* Most of the land proposed for conservation is within 2 miles of the exterior boundary of the Greenfield SOI. See SEIR Figure 3.2-1. Redding Ranch (317.97 acres) is approximately 2 miles south of Greenfield, the 51.6-acre conservation easement is along the city's eastern border, and the Somavia Ranch (66.09 acres), while outside of any city SOI boundary, is in a Community Area planned by Monterey County for future urban growth. The mitigation and conservation plan will preserve this land for agriculture.

(f) *Applicant's fiscal and technical capability*. See SEIR Appendix C. The applicant has actively involved the Ag Land Trust, City of Greenfield, Monterey County, and Monterey County LAFCO, as well as DOC staff throughout all stages of proposal development and implementation.

(h) *Long term stewardship*. The applicant has farmed the land for at least three generations, and the land has been in continuous agricultural production. This practice will continue.

Finding 3 (GC Section 51256c). The land proposed to be placed under an agricultural conservation easement is of equal size or larger than the land subject to the contract to be rescinded, and is equally or more suitable for agricultural use than the land subject to the contract to be rescinded. In determining the suitability of the land for agricultural use, the City, County, and LAFCO have considered the soil quality and water availability of the land, adjacent land uses, and any agricultural support infrastructure.

Evidence:

See SEIR Appendix C, which contains soil and production data relative to the conservation sites and contracted parcel. The area to be conserved is more than two times the area to be rescinded and is of equal quality and productivity. In fact, the westernmost portion of the Vanoli Ranch parcel to be rescinded contains inferior characteristics and river rock ("Greenfield potatoes"), while the 51.4 easternmost acres to be subdivided and preserved is of higher production quality (Sherwood Darrington, Ag Land Trust, 2016).

Finding 4 (GC Section 51256d). The value of the proposed agricultural conservation easement, as determined pursuant to Section 10260 of the Public Resources Code, is equal to or greater than 12.5 percent of the cancellation valuation of land.

Evidence:

See SEIR Appendix C and associated valuation calculations. The agriculture easement value for the conservation properties totals between $500,000 and $550,000 (two scenarios), which is greater than $450,000 (which represents 12.5 percent of the value of the 121.4 acres subject to cancellation). See specific applicant proposals.

Mitigation Measures

In response to the MOA and the current proposal, mitigation measure MM 3.2.2a in the prior EIR is modified as follows:

MM 3.2.2a The project applicant shall demonstrate adequate land use separation on all site plans and applications for subdivision, consistent with the provisions of the MOA. Residential subdivisions shall demonstrate a 100-foot minimum land use buffer between the edge of all active agricultural fields or vineyards and either the rear property lines of lots or the front façade of residential structures ~~nearest residential property lines. Non-residential setbacks shall demonstrate a 100-foot minimum land use buffer between the edge of active fields or vineyards and the nearest building surface.~~ Distances comprising the buffer may include roadway rights of way, easements, landscaping, and other uninhabited uses, and may be reduced if it can be demonstrated that a narrower distance will provide effective separation. Ultimate design and consideration of setbacks will be subject to review and approval by the City of Greenfield pursuant to the City's Interim Agricultural Buffer Program, as well as Monterey County LAFCO, during the formal annexation review process.

The buffer separation shown on the site plan and reflected in the mitigation measure has been determined to be adequate by the City of Greenfield for a number of reasons. The type of adjacent agriculture (vineyard) involves less intensive agricultural practices on an annual basis, drainage and agricultural runoff are minimal due to irrigation practices, and the lots fronting the vineyard include additional landscape and a screened area to be maintained by the development.

To address the conversion of farmland for all parcels, respond to Williamson Act contract status and impacts, and reflect the provisions of the MOA, mitigation measure MM 3.2-3 in the prior EIR is updated as follows:

MM 3.2-3 Prior to LAFCO's recordation of a Certificate of Completion for the annexation of ~~the City's submittal to LAFCO of an application to annex~~ the Franscioni ~~subject~~ property (APN 221-011-017), and prior to approval of any development rights or permits on the property issued by the City, the project applicant shall demonstrate that the Williamson Act Easement Exchange Program (WAEEP) has been successfully completed and that the permanent agricultural conservation easements ~~of approximately 396 acres~~ have been established or are imminent to the satisfaction of the California Department of Conservation, County of Monterey, and the Monterey County Ag Land Trust (formerly the Monterey County Agricultural and Historical Land Conservancy). The applicant

shall comply with the requirements set forth in the Department of Conservation's Williamson Act Easement Exchange Program ~~agreement~~ and provide adequate evidence, as determined by the City Planning Director ~~Manager~~, that the requirements ~~of the agreement~~ have been met.

Additional acreage to be converted within the project including the Scheid lands (approximately 138 acres) shall establish similar permanent agricultural conservation easements on a minimum 1:1 ratio of farmland converted, consistent with the MOA. Prior to annexation of Scheid properties, the Scheid applicants shall demonstrate to the City and LAFCO that conservation easement contracts are in place on their 230 acres of proposed mitigation land.

Conclusions

Compared to the previously certified EIR, the current proposal would no longer have a significant unavoidable impact directly related to the project-specific conversion of agricultural land. The mitigation strategies of the MOA, as implemented through project design, result in a mitigated impact. All lands proposed for annexation are now located within the City's Sphere of Influence as approved by Monterey County LAFCO.

Land use conflicts between residential and vineyard uses are effectively mitigated through the permanent and temporary buffers designed into the subdivision, based on guidance in the MOA. Cumulative impacts related to the ongoing conversion of Salinas Valley agriculture, however, remain an unavoidable impact as previously recognized by the City of Greenfield.

The Tentative Parcel Map and minor subdivision required by Monterey County to subdivide the Franscioni parcel in no way affect the previous impact analysis. The 51.6 acres to remain in the county were identified in the prior EIR as a permanent conservation area, and the future condition of the property remains unchanged regardless of jurisdictional boundaries. Approval and implementation of the WAEEP will not physically impact the subdivided parcel, and the subdivision will not result in any new physical environmental effects.

Finally, according to the draft petition and independent review by the City of Greenfield and the County of Monterey, the total acreage of the easement areas—for both the fee offsets and mitigation for physical conversion of land (435.48 acres)—exceeds the requirements of the Government Code for land values and land area. In addition, information in **Appendix C** (Agriculture Productivity Viability Comparison for RCT Lands, Lee & Pierce, February 2016) documents that the cancellation lands and easement lands are of similar agricultural quality and productivity.

Based on this body of information, the City of Greenfield finds that the size and production quality of the easements to be established are of sufficient acreage (greater than 2:1 over the acreage rescinded) as to qualify as mitigation land for local impacts under CEQA. The establishment of such easements is also consistent with the City/County/LAFCO MOA as an acceptable mitigation strategy for the conversion of land. The MOA specifically identifies that the subject parcels are acceptable as easements, and that "the parties agree this offer could provide satisfactory mitigation for the conversion of this agricultural land."

With implementation of either of the applicant's proposals, in conjunction with the mitigation of this SEIR, impacts related to cancellation of the existing Williamson Act contract on the 121.4 acres can be fully mitigated to a **less than significant** level.

A draft consistency analysis comparing the proposal to the provisions of the MOA and Monterey County LAFCO policy is included as **Appendix B** to this SEIR. This analysis is anticipated to be finalized when the project is considered by LAFCO.

3.3 AIR QUALITY

Current Environmental Setting

The air quality in Greenfield, and thus in the project area, remains essentially unchanged from 2006 conditions. Greenfield is located within the North Central Coast Air Basin (NCCAB), which, as in 2006, is currently designated as not attaining ozone (O_3) pollutant standards and coarse particulate matter (PM_{10}) standards under the California Clean Air Act. The NCCAB is designated as attaining all other federal and state standards for specific air pollutants, just as it was in 2006.

Comparative Analysis

The previously certified EIR identified the following environmental effects and their relative significance:

- Impact 3.3-1 Construction Impacts and Criteria Pollutants (less than significant)
- Impact 3.3-2 Construction Impacts and Toxic Air Contaminants (TACs) (less than significant)
- Impact 3.3-3 Operational Emissions (significant and unavoidable)
- Impact 3.3-4 Carbon Monoxide (CO) Emissions (less than significant)
- Impact 3.3-5 Odorous Emissions (less than significant)
- Impact 3.3-6 Exposure to Toxic Air Contaminants (TACs) (less than significant)
- Impact 3.3-7 Cumulative Regional Impacts (significant and unavoidable)

Construction Emissions

Daily construction-generated emissions of reactive organic gases (ROG), nitrogen oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO_2), coarse particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$) are summarized in **Table 3.3-1**. It is important to note, however, that ozone precursor pollutants (i.e., ROG and NOx) are accommodated in the emission inventories of state and federally required air plans. For this reason, the Monterey Bay Unified Air Pollution Control District (MBUAPCD) has not adopted a significance threshold for construction-generated emissions of ozone precursors. Emissions of $PM_{2.5}$ are a subset of PM_{10} emissions. The MBUAPCD has not adopted a separate significance threshold for construction-generated emissions of $PM_{2.5}$. However, for informational purposes, emissions of ozone precursor pollutants and $PM_{2.5}$ are quantified in **Table 3.3-1**.

TABLE 3.3-1
CONSTRUCTION-RELATED CRITERIA POLLUTANT AND PRECURSOR EMISSIONS
(MAXIMUM POUNDS PER DAY)

Construction Activities	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_X)		Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Phase 1 – Summer Emissions – Pounds per Day							
2017	63.88	69.71		83.33	0.14	20.97	12.51
2018	62.75	58.29		78.62	0.14	7.60	3.93
2019	61.93	52.15		74.90	0.14	7.22	3.58
Phase 2 – Summer Emissions – Pounds per Day							
2019	4.96	54.29		41.29	0.06	20.37	11.95
2020	129.29	195.72		268.15	0.50	56.04	20.06
2021	127.34	174.36		256.83	0.50	55.01	19.10
MBUAPCD Potentially Significant Impact Threshold	None	None		None	None	82 pounds/day	None
Exceed MBUAPCD Threshold?	—	—		—	—	**No**	—

Source: CalEEMod version 2013.2.2. Building construction, paving, and painting assumed to occur simultaneously. See Appendix D for emission model outputs.

As demonstrated in **Table 3.3-1**, the mixed-use development would not result in an exceedance of MBUAPCD thresholds during construction activities. Furthermore, the prior EIR contains construction-related mitigation requiring the preparation of construction emissions reduction plans (CERPs) when tentative subdivision maps are submitted. CERPs must be reviewed by the MBUAPCD and reduce construction-generated fugitive and mobile-source emissions. Construction under the proposed project is beholden to this mitigation (mitigation measure MM 3.3-1 of the prior EIR). The conclusions in the prior EIR would remain essentially the same.

Operational Emissions

As with the land uses proposed in the prior EIR, proposed project-generated increases in emissions would be predominantly associated with motor vehicle use. To a lesser extent, area sources, such as the use of natural-gas-fired appliances, landscape maintenance equipment, and architectural coatings, would also contribute to overall increases in emissions. The proposed project's long-term operational emissions are summarized in **Table 3.3-2**. In addition to comparing these estimated emissions to MBUAPCD significance thresholds, they are also compared with the emission projections of the prior EIR.

TABLE 3.3-2
OPERATIONAL-RELATED CRITERIA POLLUTANT AND PRECURSOR EMISSIONS
(MAXIMUM POUNDS PER DAY)

Operations	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Proposed Project						
Summer Emissions – Pounds per Day						
Project Buildout[1]	428.37	237.24	1400.45	2.52	188.28	82.00
Winter Emissions – Pounds per Day						
Project Buildout[1]	438.62	266.96	1655.23	2.41	188.30	82.02
Previously Certified EIR						
Prior Project[2]	*348.40*	*319.27*	*2,887.81*	*3.92*	*374.71*	*N/A*
MBUAPCD Potentially Significant Impact Threshold	137 pounds/day	137 pounds/day	550 pounds/day	150 pounds/day	82 pounds/day	none

*Source: [1]CalEEMod version 2013.2.2. Building construction, paving, and painting assumed to occur simultaneously. See **Appendix D** for emission model outputs.*

[2] South End SOI Final EIR [URBEMIS version 2002]

As demonstrated in **Table 3.3-2**, the proposed project is estimated to generate criteria air pollutants at levels lower than the emissions rates identified in the previously certified EIR, except for ROG. The decrease in NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$ is a result of the determinations identified in the updated traffic report and trip generation calculations for the proposal, which concluded that the project will result in fewer overall traffic trips, resulting in decreased pollutant emissions. While the ROG associated with the proposed project increased, this is primarily attributable to the differences in emissions modeling software used to estimate proposed project emissions (CalEEMod version 2013.2.2) and the prior project's emissions (URBEMIS version 2002). The primary difference between the two models that affects ROG emission projections is attributed to the fact that CalEEMod includes the usage of consumer products at nonresidential facilities. The primary pollutant generated by consumer products is ROG. Therefore, the emissions modeling in the prior EIR did not account for the use of consumer products at nonresidential facilities. Discounting such emissions sources from the proposed project would subtract 61.54 pounds of ROG. It is also noted that both the proposed project and the prior project exceed the MBUAPCD significance standard for ROG. The conclusions in the prior EIR would remain essentially the same in terms of operational air pollutant impacts. This is also true of potential impacts associated with carbon monoxide (CO) hot spots, toxic air contaminant exposure, and odors. The proposed project would result in less daily traffic and thus a reduced amount of mobile-source CO concentrations. Additionally, the proposed project would still be subject to MBUAPCD rules and regulations and permitting requirements established to protect sensitive receptors from air toxic exposure and annoying odors.

Conclusion

Based on the revised models for the project, there are no changes to the project that would alter the analysis and conclusions of this section of the prior EIR, and the mitigation measures remain adequate. Cumulative effects would also remain significant and unavoidable as documented in the prior EIR. In addition, the minor subdivision component of the project to retain 51.6 acres in the

county would have no bearing on air quality impacts, as the existing and future land uses remain the same.

3.4 BIOLOGICAL RESOURCES

Current Environmental Setting

The project area and territory to be annexed currently consist of irrigated row and field crops, as well as vineyards. The subject parcels contain no critical habitat and very low likelihood for special-status plants or animals. Cropland and vineyard provide foraging habitat for many species of birds and mammals. Except for crop type and rotation, these conditions are the same as previously documented in 2006.

Comparative Analysis

The prior EIR identified the following biological impacts associated with the project:

- Impacts 3.4-1 and -2 Potential Adverse Effect on Special Status Species (potentially significant)
- Impact 3.4-3 Cumulative Biological Impacts (less than significant)

Trees along the boundaries of the site were determined to likely provide nesting areas for migratory birds, and mitigation measures were included requiring surveys for active nests if construction occurred during the nesting season. San Joaquin kit foxes were determined to potentially transit and/or temporarily occupy the parcels; therefore, mitigation measures were included to minimize impacts to any kit foxes that may be on the site during the construction phase of the project. Because site conditions are essentially the same as when the prior EIR was completed, no new impacts would result, and the analysis and mitigation measures would remain applicable and adequate to mitigate impacts.

Given the similarity of the Scheid East Industrial parcel to the adjacent southern Scheid East parcel (e.g., under active cultivation), the measures included in the prior EIR for tree surveys, preconstruction surveys, and kit fox avoidance are applicable to this parcel as well.

Cumulative effects are and will continue to be mitigated through implementation of project-specific mitigation measures over time.

Conclusion

Site conditions have remained essentially the same since certification of the prior EIR, and existing mitigation measures remain applicable. The Scheid East Industrial parcel, not part of the prior EIR analysis, contains site conditions similar to the rest of the properties, and all mitigation will also apply to this site.

The biological resources evaluation is in no way affected by the Williamson Act cancellation and exchange process, nor by the minor subdivision to be processed by the County. These actions serve to maintain certain property in agricultural use, which has no effect on biological resources or habitat values.

3.5 CULTURAL RESOURCES

Current Environmental Setting

As cultivated farmland with limited structures or improvements, site conditions with respect to cultural resources remain essentially unchanged from 2006 as documented in the cultural resources evaluation.

Comparative Analysis

The prior EIR identified the following cultural resource impacts associated with the project:

- Impact 3.5-1 Undiscovered Prehistoric Resources, Historic Resources, and Human Remains (potentially significant)
- Impact 3.5-2 Potential Impacts to Paleontological Resources (potentially significant)
- Impact 3.5-3 Cumulative Impacts to Cultural Resources (less than significant)

The prior EIR found that the proposed annexation would have a negligible effect on cultural resources, as the land has been actively farmed for decades and highly disturbed by intensive farming practices. Existing structures, including a single-family residence and commercial structures, were not identified as holding historic significance based on the prior analysis. Based on past studies conducted in the city in the vicinity, cultural resource values on disturbed land have been low. The Scheid East Industrial parcel, not part of the previous evaluation, is also intensively farmed and can be considered to have a similarly low cultural sensitivity, including for paleontology. No components of the current proposal change the conclusions in the prior EIR, and all mitigation measures remain applicable.

Conclusion

Due to continued farming operations since 2006, site conditions, potential impacts, and adopted mitigation strategies remain essentially the same. Mitigation in the prior EIR required work stoppage and evaluation of any resources encountered during construction, including implementation of on-site mitigation if this occurs. No further mitigation is required.

Other actions necessary for this project, including the Williamson Act cancellation and exchange process and the County minor subdivision, are not affected by cultural resource issues. Establishing permanent conservation easements will not physically impact the affected parcels compared to existing conditions.

3.6 GEOLOGY, SOILS, AND GEOLOGIC HAZARDS

Current Environmental Setting

Of all the physical conditions present at the project site, geologic conditions remain the most stable and unchanged. The geologic units, topography, seismic information, and soil conditions are essentially the same as documented in the prior EIR.

Comparative Analysis

The prior EIR identified the following significant impacts related to geological conditions or hazards:

- Impact 3.6-1 Potential Exposure to Seismic Ground Shaking (potentially significant)
- Impact 3.6-2 Seismic Ground Failure/Liquefaction (less than significant)
- Impact 3.6-3 Soil Erosion/Loss of Topsoil (potentially significant)
- Impact 3.6-4 Potential for Expansive Soils (potentially significant)
- Impact 3.6-5 Corrosive Soils (potentially significant)

A detailed geotechnical analysis was conducted for APN 221-011-017, which identified several of the local soil characteristics in the immediate area. To address seismic ground shaking, expansive soils, and corrosive soils, the prior EIR required implementing the recommendations of the geotechnical study (for APN 221-011-017) and preparation of similar detailed reports for the other parcels. These requirements and mitigation remain in effect for the current proposal.

Since the residential subdivision is likely to be the first phase of development and is proposing specific plans, the applicant is required, as part of the tentative and final map and building design and permitting processes, to prepare and submit a geotechnical investigation and soils report that provide design-level recommendations specific to the site. Assuming soil conditions are similar to those on APN 221-011-017, specific recommendations are to be expected regarding foundation design, use of materials to withstand corrosivity, and similar recommendations typical of residential development.

The project currently proposed does not introduce any new or intensified land uses that were not previously analyzed. The Scheid East Industrial parcel north of the Franscioni parcel, which was not included in the prior EIR project description, has the same fundamental geologic and soil characteristics as the surrounding properties. Similarly, the minor subdivision to be processed by the County and the Williamson Act contract cancellation and exchange process will not create any physical environmental impacts compared to those analyzed in the prior EIR.

Conclusion

Because geologic and soil conditions are essentially unchanged, and because the project's geotechnical and soil investigations do and will set forth specific development standards specific to development on individual parcels, the environmental effects of the proposal have been effectively evaluated and mitigated. No additional mitigation is required; however, site-specific investigations are still required prior to the approval of physical site development and issuance of building permits. The Williamson Act cancellation and exchange process and County minor subdivision will have no impact on existing geologic conditions, nor will these actions cause any new impacts, as the resulting land uses will remain the same.

3.7 SITE HAZARDS AND HAZARDOUS MATERIALS

Current Environmental Setting

Twining Laboratories completed two separate Phase I Environmental Site Assessments (ESAs) in October 2005 for parcels 221-011-017 (Franscioni) and -068 (Scheid West). Each ESA analyzed the subject property for recognized environmental conditions in accordance with standard criteria. Based on field reviews of the subject parcels, the site conditions with respect to hazards and hazardous materials have remained essentially the same with no significant changes to site improvements or introduction of new hazardous conditions. As such, the reports and analysis in the prior EIR remain applicable to the site. The remaining parcels, as well as the Scheid East Industrial parcel, continue to be reviewed at the programmatic level, as no site-specific development is proposed at this time.

Comparative Analysis

The prior EIR identified the following impacts related to site hazards and hazardous materials:

- Impact 3.7-1 Construction-Related Hazards (less than significant)
- Impact 3.7-2 Exposure to Residual Pesticides and Hydrocarbons (potentially significant)
- Impact 3.7-3 Exposure to Hazardous Substances (potentially significant)
- Impact 3.7-4 Future On-Site Industrial and Highway Commercial Uses (potentially significant)
- Impact 3.7-5 Cumulative Risk of Exposure to Hazardous Materials (less than significant)

Based on information in prior reports, pesticides and other agricultural chemicals have been applied to the agricultural parcels for decades and residual concentrations of these chemicals likely remain in the soil today. This is also the case for the Scheid East Industrial parcel, which was not part of the prior EIR. The prior EIR included specific recommendations for the subject parcels to ensure any residual pesticides and hydrocarbons are effectively identified and remediated prior to site development. Mitigation measure MM 3.7-2 is updated as follows in response to the current proposal:

MM 3.7-2 As part of the application submittal for subsequent site development plans within the project area, each project applicant shall have a qualified professional conduct a Phase II Soil Investigation. (For parcels 221-011-071, -070, and –018, both a Phase I and Phase II will be required). The Phase II ESA shall assess whether soils on the project site were contaminated by storage or use of hazardous chemicals including pesticides.

The Phase II study shall also ensure that the oil well on APN 221-011-017 was capped and abandoned consistent with current ~~requirements~~ Federal, State and local requirements. To the extent that soil contamination is detected during the Phase II Investigation, the applicant shall develop a remediation program in consultation with the California Department of Toxic Substances Control to address any identified contamination hazard, if present. The approved remediation program shall be prepared and submitted prior to approval of final maps ~~as a component of specific development applications~~.

The applicant shall demonstrate compliance with the recommendations and remedial measures as part of final improvement plans.

The potential for presence and exposure to existing hazardous substances on the subject parcels (specifically 221-011-017 and -068) was documented in the prior EIR. Mitigation measure MM 3.7-2 (above) and mitigation measure MM 3.7-3 provide specific recommendations for remediation, demolition, and well abandonment. These measures remain applicable and in effect.

With respect to future land uses, it is possible that future development may result in industrial uses which use hazardous materials in their daily operations. These potential effects are fully addressed by mitigation measures MM 3.7-4a and 3.7-4b, which are also applicable to the Scheid East Industrial parcel.

Conclusion

Due to continued farming operations on the subject parcels since 2006, site conditions, potential impacts, and adopted mitigation strategies remain essentially the same as previously documented. Mitigation in the prior EIR (as modified by this SEIR) requires qualified Phase II ESAs for all development plans, the removal of all contaminants and contaminant sources, sufficient environmental review for future industrial uses, and all on-site handling and storage of hazardous materials to take place in accordance with all county and state health requirements. This mitigation remains applicable to the current proposal, and no further mitigation is required.

Related project actions such as the Williamson Act cancellation and exchange process and the County minor subdivision in no way affect the environmental analysis. Continuing existing agricultural operations and creating permanent conservation easements on the affected parcels will not create new hazardous conditions.

3.8 HYDROLOGY AND WATER QUALITY

Current Environmental Setting

As cultivated farmland with limited structures or improvements, site conditions with respect to hydrology and water quality remain essentially unchanged from 2006. No significant improvements or alterations to drainage patterns have occurred, and the 100-year flood zone remains safely to the east along the Salinas River. The Scheid West parcel is served by an existing drainage swale that flows to US 101 and then into an existing retention basin located on the east side of the highway. The drainage from the eastern parcels, including the Scheid East Industrial parcel, either surface flows to the Salinas River or is collected in swales and directed toward an earthen basin located in the center of the Franscioni parcel.

Comparative Analysis

The prior EIR identified the following potentially significant hydrology and water quality impacts associated with the original proposal:

- Impact 3.8-1 Alteration of Drainage Patterns/Increased Stormwater Runoff (potentially significant)
- Impact 3.8-2 Flood/Inundation Hazards (less than significant)
- Impact 3.8-3 Construction Water Quality (potentially significant)

- Impact 3.8-4 Urban Non-Point Source Pollution (potentially significant)
- Impact 3.8-5 Cumulative Impacts (less than significant)

The prior EIR found that, with the required mitigation measures, the proposed annexation would have a less than significant effect on hydrological and water quality resources. Compared to the project as analyzed in the prior EIR, the Scheid West parcel would have fewer dwelling units and therefore less coverage of impervious surface. On the east side of US 101, the addition of the Scheid East Industrial parcel will increase the development potential and also the amount of impervious surface in that location. This increase in site coverage and total area of development will incrementally increase the runoff estimates for this portion of the project area. Alterations to drainage patterns and additional grading and erosion potential are a consequence of this larger potential development footprint.

The prior EIR, similar to this SEIR, addressed the east-side parcels at a programmatic level. As such, the mitigation measures are prescriptive and require that drainage facilities perform according to acceptable performance standards and are consistent with all applicable local and state permits and engineering standards. The primary method of drainage control and non-point source water quality is the construction of a series of detention basins and swales that serve to capture, percolate, and filter urban runoff based on the ultimate development plans. This mitigation remains applicable to the current proposal to address forecast increases in runoff volumes. The mitigation measures effectively apply to parcels east and west of US 101.

The same conclusion can be reached regarding construction water quality and urban non-point source pollution. The overall industrial footprint is now larger compared to the previous evaluation; however, the programmatic mitigation measures (MM 3.8-1a through 3.8-1c) address water quality, as well as quantity, at a programmatic level of detail.

Conclusion

Due to continued farming operations since 2006, site conditions, potential impacts, and adopted mitigation strategies remain essentially the same at a programmatic level of analysis. Mitigation measures in the prior EIR required the applicant to provide detailed drainage plans that will adequately accommodate any additional runoff from the site(s) and that basin plans be designed to handle runoff volumes and avoid adding additional runoff to the drainage facilities at US 101. Retention basins are to be designed to provide additional recreational benefits for the City. The project(s) will be subject to a National Pollutant Discharge Elimination System (NPDES) General Permit, will be required to prepare and implement a stormwater pollution prevention plan (SWPPP), and will comply with all current standards and regulations as required by the City of Greenfield and the State Water Resources Control Board. All drainage and erosion control plans will incorporate measures to ensure that eroded or exposed soils are maintained on-site and mitigate potential water quality impacts. No further mitigation is required. In addition, the Williamson Act cancellation and exchange process and the County minor subdivision will not affect drainage patterns, flooding or water quality, as these actions do not change existing land uses and result in the continuation of existing agricultural practices.

3.9 LAND USE AND PLANNING

Current Environmental Setting

The pattern, intensity, and general uses of land on the subject parcels and surrounding territory have not significantly changed since certification of the prior EIR. What has changed, however, are the policy and boundary approvals by the City, County, and LAFCO that affect how and where land is annexed into the City of Greenfield.

In 2006, the City proposed a modification to its overall citywide Sphere of Influence (SOI) boundary, which included the South End parcels. The ultimate SOI was adopted by LAFCO in 2007. As identified in the project description (Section 2.0) and again in this SEIR subsection 3.2 (Agricultural Resources), the Greater Greenfield Memorandum of Agreement (MOU) was executed in June 2013. These documents guide the future direction of planned growth in the city and include all of the South End subject parcels. In addition, Monterey County LAFCO policies and procedures relating to annexations and reorganization were updated in February 2013.

While the City of Greenfield's General Plan has only seen minor updates since the 2006 General Plan Amendment to include the South End properties, the County of Monterey adopted its comprehensive General Plan update in 2010. The County's General Plan is relevant with respect to the annexation and the minor subdivision required for the project.

Comparative Analysis

The prior EIR identified the following impacts related to land use, with one potentially significant impact:

- Impact 3.9-1 Conflict with Goals and Policies Adopted to Avoid or Mitigate Environmental Effects (less than significant)
- Impact 3.9-2 Effects Upon an Established Community (less than significant)
- Impact 3.9-3 Conflict with Surrounding Uses (potentially significant)
- Impact 3.9-4 Cumulative Land Use Impacts (less than significant)

Although physical land use compatibility was addressed in sections specific to agricultural resources, the prior EIR required that future annexation include the smaller NH3 Service Company parcel to avoid creating an island of county land. The current annexation proposal includes both the NH3 and the L.A. Hearne parcels, as well as state and county rights-of-way as necessary, to avoid this condition. This mitigation has been satisfied by the current proposal.

The Scheid East Industrial parcel was included in the environmental analysis of the City's 2005 General Plan. This parcel is separated from existing residential uses to the north by Elm Avenue and an existing light industrial zoning district. The heavy industrial land uses allowed in this location by the 2005 General Plan are subject to General Plan policies such as Policy 2.1.12, which requires buffering techniques between differing land uses that abut one another. Site-specific proposals in this area may require additional environmental review when specific applications are submitted.

With respect to policy consistency, the proposal remains consistent with the City's General Plan as analyzed throughout the prior EIR. In fact, the prior South End SOI Amendment and General Plan Amendment project amended the General Plan to accommodate the South End territory. The General Plan consistency analysis remains adequate.

In response to the MOA and updated LAFCO policy and procedures, **Appendix B** to this SEIR includes a thorough (draft) consistency analysis measuring the proposal against current policy guidance. The analysis concludes that the proposal is consistent with both the MOA and current LAFCO policy.

The County of Monterey General Plan was updated in 2010. The only aspect of the County's updated General Plan relevant to the proposed annexation is Land Use Policy 2.17, which supports annexations that are consistent with the County General Plan policies, including (1) directing city growth away from the highest quality farmlands; (2) providing adequate buffers along developing agricultural urban interfaces; and (3) mitigating impacts to county infrastructure. There are no specific policies in the updated document that conflict in land use policy with implementation of the project. The project and all related actions, including the Williamson Act cancellation and exchange process and minor subdivision, are not in conflict with County policy and will not negatively impact county infrastructure such as roads and service systems. The City of Greenfield and project sponsors will be required to improve such systems as necessary to meet City performance standards.

Conclusion

Based on the prior and updated consistency analysis, review of environmental and land use conditions in the field and related land use compatibility findings relative to the urban/agricultural interface, and the project's incorporation of parcels to avoid creation of a county island, the project's land use impacts remain less than significant.

3.10 NOISE

Current Environmental Setting

The primary source of community noise within the city continues to be roadway noise. Other sources of noise include noise from agricultural operations and stationary noise sources such as schools. Compared to the analysis in the prior EIR, very little has changed in the existing community noise environment. The subject parcels continue to be farmed. As mobile noise sources (traffic) are the predominant source of noise, this EIR has identified changes in traffic volumes. Based on the traffic report prepared (see subsection 3.11), overall traffic volumes on US 101 are comparable to 2006 conditions. US 101 is the main source of noise in the vicinity.

The addition of the Scheid East Industrial parcel into the current proposal warrants an update of the existing conditions. Established residential uses (a motel) are located adjacent to this parcel across Elm Avenue. With the exception of the motel, all other land uses along the north side of Elm Avenue are light industrial. Because residential use is considered a "sensitive receptor," this SEIR includes this area in the scope of evaluation since that parcel is designated for future heavy industrial use, as proposed by the project and as designated in the City's General Plan.

Comparative Analysis

The prior EIR identified the following noise impacts associated with ultimate development of the annexation area:

- Impact 3.10-1 Construction Noise (potentially significant)
- Impact 3.10-2 Long-Term Increase in Stationary-Source Noise (potentially significant)
- Impact 3.10-3 Increase in Traffic (Mobile) Noise Levels (less than significant)
- Impact 3.10-4 Noise Levels at Proposed Noise-Sensitive Land Uses (potentially significant)
- Impact 3.10-5 Cumulative Traffic Noise (less than significant)

With respect to construction noise, the prior EIR included specific measures addressing construction times and equipment management. The EIR also included a temporary barrier to limit impacts adjacent to the existing schools. Because these measures address construction noise at the programmatic level on the east side of US 101, as well as at the project-specific level for the Scheid West parcel, the measures remain applicable to the current proposal. There are no changes in the project that warrant further or additional mitigation related to construction noise.

Similarly, for future stationary noise sources associated with developed land, the prior EIR required that refined acoustical analysis and specific performance standards be employed based on the type of use proposed and specific locations. At this programmatic level of detail for land uses east of US 101, this requirement remains relevant and applicable to the annexation area, including the Scheid East Industrial parcel.

For mobile (traffic) noise levels, the prior EIR found that noise impacts would be less than significant to existing land uses. This is because existing sensitive land uses—residential areas and schools—are located at a sufficient distance from El Camino Real and US 101 that changes in traffic volumes will not significantly change the noise environment in these locations. Based on the traffic information prepared for this SEIR, this remains the case. The Scheid East Industrial parcel assumes 44 additional acres of heavy industrial south of Elm Avenue east of US 101, which could generate additional industrial traffic. However, this additional traffic is assumed in the traffic report, and existing mitigation measures affect all potential increases in noise levels including on roadways in the vicinity.

In terms of potential impacts to future sensitive land uses (the new residential subdivision west of US 101), the prior EIR required noise barriers to reduce noise levels generated from area roadways and nearby schools, based on predicted noise levels. These barriers are required along El Camino Real and along the boundary with the schools. These measures remain valid and applicable to the current proposal. No additional noise mitigation is warranted, as the prior EIR fully addresses noise impacts to this future subdivision.

Related project actions such as the Williamson Act cancellation and exchange process and the County's minor subdivision are not sensitive to the noise environment, and will not cause any additional impacts compared to those previously identified as resulting land uses will remain unchanged. No specific analysis or mitigation is required for these actions related to noise impacts.

Conclusion

Based on the current project description and comparative changes in predicted traffic volumes between the prior EIR and the current traffic report, changes in noise levels from mobile sources will remain essentially the same compared to the previous analysis. Additional vehicle trips will be generated by the Scheid East Industrial parcel; however, the residential subdivision will have 180 fewer units than previously assumed. The existing mitigation measures that require site-specific analyses for commercial and industrial uses remain applicable to all parcels east of US 101. Similarly, existing mitigation is in place to fully mitigate noise on future sensitive receptors (new homes) west of the highway. The current proposal does not significantly change these conditions, and no further mitigation is warranted.

3.11 TRAFFIC AND CIRCULATION

Current Environmental Setting

The previous (2005) traffic study for this project quantified existing roadway conditions as of that time period. Due to a significant slowing of economic conditions and very limited new construction in Greenfield over several years, existing traffic conditions and volumes are considered similar to conditions as previously documented (Hatch Mott MacDonald, 2015). The roadway network in Greenfield operates at acceptable levels of service, although the 2005 General Plan acknowledges that future buildout of the city will require new and expanded roadway facilities.

Comparative Analysis

The prior EIR analyzed the following impacts related to traffic and circulation:

- Impact 3.11-1 El Camino Espinosa Overpass/High School Driveway (significant)
- Impact 3.11-2 Highway 101 NB Ramps/Patricia Lane/El Camino real Intersection (significant)
- Impact 3.11-3 Highway 101 (less than significant)
- Impact 3.11-4 Intersection LOS at Full General Plan Buildout (significant)
- Impact 3.11-5 Roadway Segment LOS at Full General Plan Buildout (significant)
- Impact 3.11-6 Roadway Network Expansion
- Impact 3.11-7 Highway 101 Volumes with Full General Plan Buildout (significant)
- Impact 3.11-8 Parking Capacity (less than significant)
- Impact 3.11-9 Pedestrian and Bicycle Facilities (potentially significant)
- Impact 3.11-10 Transit System (less than significant)
- Impact 3.11-11 Secondary Effects from Project Improvements (potentially significant)

To reiterate the analysis approach, the purpose of this SEIR is to provide a relative comparison of predicted impacts from the project as studied in 2005, to the project currently proposed. Based on the refinement and reduction of intensity of land uses currently proposed, Hatch Mott MacDonald (June 2016) updated the trip generation for the current proposal to understand and quantify these differences. The updated trip generation information is included as **Appendix E**.

Under Background Plus Interim Project Traffic conditions, which represent background conditions plus Phase I of the project, the original project caused impacts at specific intersection facilities near the El Camino Real and Espinosa Road intersection with US 101 ramps (Impacts 3.11-1 and 3.11-2). The mitigation measures identified required specific widening, striping, and signalization improvements at these locations. The prior project was estimated to generate up to 39,436 daily trips, while the current proposal is estimated to generate only 15,165 daily trips, or a reduction of 62 percent. The primary reasons for this reduction include fewer residential units, a significant reduction in commercial square footage assumed, and the lower trip generation rates for warehousing within the industrial designation. The original EIR, by contrast, programmatically assumed full buildout of every acre of land at maximum site coverage. Practically and economically, such a scenario does not represent a realistic development scenario. At this time, the conservative mitigation requirements will still apply unless proven otherwise.

In the General Plan Buildout/Project Buildout scenario (cumulative impact analysis), the project was predicted to exacerbate and contribute to a series of intersection and segment impacts caused by the overall growth of the City of Greenfield (Impacts 3.11-4 through 3.11-7). To mitigate the project's impacts, measures have been established that require a new interchange at US 101 and Espinosa Road (once traffic trips warrant the improvement) and a fair share contribution toward a series of planned improvements to 15 intersections throughout the city. The latter would be paid through the payment of City and Transportation Agency for Monterey County (TAMC) transportation impact fees. These improvements and payment of fees would reduce impacts to a less than significant level. These requirements will remain in place for the current proposal.

Under cumulative conditions, impacts would also occur to the mainline section of US 101 between Thorne Road and Oak Avenue. As levels of service would be below LOS C, and no impact is in place to address freeway improvements, this impact was and remains a significant unavoidable consequence of the proposal until proven otherwise.

Mitigation measures identified to address pedestrian and bicycle facilities will also remain in place, despite the reduction in project-generated trips resulting from the current proposal.

Conclusion

The project as currently proposed is estimated to result in 24,271 fewer daily trips compared to previous estimates in 2005–2006. However, the mitigation measures previously identified will remain in place, since the majority of the measures either require a proportionate share of financial contribution and/or are only triggered as warranted by traffic conditions and trip generation. If the project as currently proposed does not trigger a specific improvement, it will only be responsible for its fair share contribution. For these reasons, the project will result in similar physical impacts to the environment related to traffic and circulation.

The Scheid East Industrial parcel was identified in the City's General Plan and General Plan EIR, and continues a pattern of low-intensity industrial in the eastern portion of the city that will not raise new or more severe impacts to the roadway network. Similarly, the WAEEP and the minor subdivision to preserve the 51.6 acres will not change traffic patterns in any way.

3.12 PUBLIC SERVICES AND UTILITIES

Current Environmental Setting

The public services section of the previously certified EIR analyzed water supply and distribution, wastewater collection and treatment, utilities, governmental facilities, student generation and schools, solid waste service, and park and recreation needs. The project site is located in the services areas of the City of Greenfield Police Department (police), the Greenfield Fire Protection District (fire), the Pacific Gas & Electric Company (electricity and natural gas), AT&T (telecommunications), Charter Communications (cable television), the Greenfield Union School District and the South Monterey County Joint Union High School District (schools), the Salinas Valley Solid Waste Authority (solid waste disposal), and the City of Greenfield Public Works Department (parks and recreation).

Comparative Analysis

The prior EIR analyzed the following impacts related to public services and facilities:

Impact 3.12-1 Potable Water Demand (less than significant)

Impact 3.12-2 Potable Water Delivery (potentially significant)

Impact 3.12-3 Wastewater Collection and Treatment (potentially significant)

Impact 3.12-4 Law Enforcement Services (less than significant)

Impact 3.12-5 Fire Services (less than significant)

Impact 3.12-6 Electric, Natural Gas, Telephone, and Cable Services (potentially significant)

Impact 3.12-7 Schools (less than significant)

Impact 3.12-8 Solid Waste Services (less than significant)

Impact 3.12-9 Parks and Recreation (potentially significant)

Impact 3.12-10 Groundwater Usage and Distribution (cumulative – less than significant)

Impact 3.12-11 Wastewater Treatment Facility (cumulative – less than significant)

Regarding potable water demand, development, and distribution, the project as currently proposed would require substantially less water than the project as previously analyzed. Based on Table 2-2 (Project Description), the development assumptions for the project have been substantially reduced. Highway commercial square footage has been reduced by 76 percent, industrial/warehouse use is similar, and residential units have been reduced by 55 percent. Similar to the findings in the prior EIR, water demand for the project would be less than significant given the current groundwater supplies, pumping capacity, and distribution systems maintained by the City. In terms of delivery, existing mitigation measures remain applicable, which require developers to fund and/or construct system expansions.

Similar to water system expansion, the City's wastewater treatment and disposal system is scalable to accommodate increases in demand over time. The City is currently updating its water and wastewater infrastructure master plans, which will provide additional demand data and system planning. Because the South End properties have been previously included in the City's SOI, all land use assumptions will be included in the City's infrastructure planning documents. No additional physical environmental impacts will occur compared to those analyzed in the prior EIR.

Population-based systems such as fire protection, police services, parks and recreation, and schools would be reduced with the current proposal. With 149 new residential units (compared to 329 previously), the anticipated population of the area would decrease accordingly. The less than significant findings of the prior EIR remain unchanged. All existing impact fee programs will apply to the current proposal to fund incremental increases and demand on public service systems.

Conclusion

The project is consistent with the prior proposal, assumes substantially reduced square footage of commercial use, and is consistent with the City's General Plan in terms of land use and direction of growth. Compared to the prior proposal (and the prior EIR), the reduction of 180 single-family homes significantly reduces population-based service demands, particularly on the south side of Greenfield. The addition of the Scheid East Industrial parcel represents an incremental increase in demands for these 44 acres of heavy industrial use; however, this use was included and analyzed in the City's General Plan land use pattern, and total industrial/warehouse assumptions are similar to the prior proposal. Mitigation measures in the prior EIR require that water, wastewater, and other backbone infrastructure systems be funded through development. The conclusions of the prior EIR remain unchanged, and the project as proposed will have no greater impact on public services than previously analyzed.

Similarly, the project's related actions—the Williamson Act contract cancellation and exchange and the minor subdivision—will have no direct or indirect impact on public services, as these actions will not result in physical changes to the environment over existing conditions.

3.13 GREENHOUSE GAS EMISSIONS

Current Environmental Setting

There is scientific consensus that the contribution of greenhouse gas (GHG) emissions into the atmosphere is resulting in the change of the global climate. The global average temperature is expected to increase relative to the 1986–2005 period by 0.3 to 4.8 degrees Celsius (°C) (0.5–8.6 degrees Fahrenheit [°F]) by the end of the 21st century (2081–2100), depending on future GHG emission scenarios (IPCC 2014). According to the California Natural Resources Agency (2012), temperatures in California are projected to increase 2.7°F above 2000 averages by 2050 and, depending on emission levels, 4.1–8.6°F by 2100. Physical conditions beyond average temperatures could be indirectly affected by the accumulation of GHG emissions. For example, changes in weather patterns resulting from increases in global average temperature are expected to result in a decreased volume of precipitation falling as snow in California and an overall reduction in snowpack in the Sierra Nevada. The Global Warming Solutions Act, also known as Assembly Bill (AB) 32, is a legal mandate requiring that statewide GHG emissions be reduced to 1990 levels by 2020. In addition, two Executive Orders, California Executive Order 5-03-05 (2005) and California Executive Order B-30-15 (2015), highlight GHG emissions reduction targets, though such targets have not been adopted by the State and remain only a goal of the Executive Orders. Specifically, Executive Order 5-03-05 seeks to achieve a reduction of GHG emissions of 80 percent below 1990 levels by 2050 and Executive Order B-30-15 seeks to achieve a reduction of GHG

emissions of 40 percent below 1990 levels by 2030. Technically, a governor's Executive Order does not have the effect of new law but can only reinforce existing laws. For instance, as a result of the AB 32 legislation, the State's 2020 reduction target is backed by the adopted AB 32 Scoping Plan, which provides a specific regulatory framework of requirements for achieving the 2020 reduction target. The State-led GHG reduction measures, such as the Low Carbon Fuel Standard and the Renewables Portfolio Standard, are largely driven by the AB 32 Scoping Plan. Executive Orders S-03-05 and B-30-15 do not have any such framework and therefore provide no emissions reduction mechanisms that can be applied to the analysis of land use projects for the purpose of meaningful emissions estimates. As a result of Executive Orders B-30-15 and 5-03-05, new legislation is proposed to establish post-2020 GHG reduction goals; however, no action on the legislation has been taken as of this writing (April 2016).

Comparative Analysis

GHG emissions associated with the proposed project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. There would also be long-term regional emissions associated with new vehicular trips, stationary source emissions such as natural gas used for heating, and indirect source emissions such as electricity usage for lighting.

The South End SOI Final EIR was certified in August 2006 and does not evaluate the effects of GHG emissions generation. At the time of approval of the EIR, the issue of contribution of GHG emissions to climate change was a prominent issue of concern. On March 18, 2010, amendments to the State CEQA Guidelines took effect which set forth requirements for the analysis of GHG emissions under CEQA. Since the South End SOI Final EIR has already been approved, the determination of whether GHG emissions and climate change needs to be analyzed for this specific development is governed by the law on supplemental or subsequent EIRs (Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15163). GHG emissions and climate change are not required to be analyzed under those standards unless they constitute "new information of substantial importance, which was not known and could not have been known at the time" the South End SOI Final EIR was approved (CEQA Guidelines Section 15162(a)(3)).

The issue of GHG emissions and climate change impacts is not new information that was not known or could not have been known at the time of the approval of the previous EIR. The issue of climate change and GHG emissions was widely known prior to the EIR's approval. The United Nations Framework Convention on Climate Change was established in 1992. The regulation of GHG emissions to reduce climate change impacts was extensively debated and analyzed throughout the early 1990s. The studies and analyses of this issue resulted in the adoption of the Kyoto Protocol in 1997.

As is clear from documents in the administrative record, the fact that GHG emissions could have a significant adverse environmental impact was known at the time the South End SOI Final EIR was approved in 2006. Consistent with the statutory language, the courts have repeatedly held that new information that "was known" or "could have been known with the exercise of reasonable diligence" at the time of the EIR certification does not trigger the supplemental EIR standard. (*Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal.App.4th 515, 532 ("CREED II"); ALARM, supra, 12 Cal.App.4th at 1800–1803.) In particular, the courts have held that information on GHG emissions could have been known as early as 1994 and therefore do not trigger the new information standard under Section 21166 for EIRs certified after that date (CREED II, supra, 196 Cal.App.4th at 530–532 [Impact from GHGs not new information for EIR certified in 1994.]). Since the South End SOI Final EIR was approved in 2006, CREED II is dispositive and establishes that no review of this environmental issue is required for this project.

(See also *Concerned Dublin Citizens v. City of Dublin* (2013) 214 Cal. App. 4th 1301—the potential effects of GHG emissions were known and could have been addressed in conjunction with the approval of the South End SOI Final EIR in 2006.)

Therefore, the impact of GHG emissions on climate change was known at the time of adoption of the South End SOI Final EIR in 2006. Therefore, under CEQA standards, it is not new information that requires analysis in a supplemental EIR or negative declaration. No supplemental environmental analysis of the project's impacts on this issue is required under CEQA. Nonetheless, for purposes of full disclosure, a GHG analysis of the proposed project has been provided.

As with the original project, the subject of the previously certified EIR, construction and operation of the proposed project would generate GHG emissions, with the majority of energy consumption and associated generation of GHG emissions occurring during the project's operation (as opposed to during its construction). During construction, GHGs would be emitted through the operation of construction equipment and from worker and vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHG emissions such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Furthermore, CH_4 is emitted during the fueling of heavy equipment. Operational activities associated with urban development results in emissions of CO_2, CH_4, and N_2O from the following primary sources: area source emissions (e.g., fireplaces and landscape equipment); energy source emissions (e.g., indirect emissions from power generation); mobile source emissions (e.g., project traffic); solid waste (e.g., hauling and anaerobic breakdown); and water supply, treatment, and distribution (e.g., energy used to convey, treat, and distribute water and wastewater).

The resultant GHG emissions of the proposed project were calculated by Michael Baker International using the California Emissions Estimator Model (CalEEMod), version 2013.2.2, computer program (see **Appendix D**). CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for the use of government agencies, land use planners, and environmental professionals. The project operational carbon dioxide equivalent (CO_2e) emissions resulting from the proposed project are identified in **Table 3.13-1**.

TABLE 3.13-1
PROJECT GREENHOUSE GAS EMISSIONS – PROJECT OPERATION (METRIC TONS PER YEAR)

Emissions Source	CO_2e
Construction Amortized over 30 Years[1]	367
Area Source (landscaping, hearth)	228
Energy[2]	7,410
Mobile[3]	28,338
Waste	1,474
Water and Wastewater	1,025
Total	**38,476**

*Source: CalEEMod version 2013.2.2. See **Appendix D** for emission model outputs.*

Notes:

1. *Projected CO_2e emissions from construction activities have been quantified and amortized over the life of the project (30 years). The amortized construction emissions are added to the annual average operational emissions.*
2. *Emissions projections account for PG&E's projected (2020) CO_2 emission intensity factor of 368.08 pounds of CO_2 per megawatt of energy generated.*
3. *Emissions projections are based on the trip generation rate of 39,436 average daily trips per Higgins Associates.*

As shown, the proposed project would result in 38,476 metric tons of GHG emissions. Thresholds of significance illustrate the extent of an impact and are a basis from which to determine the appropriate definition of "negligible" GHG emissions. Significance thresholds for GHG emissions resulting from land use development projects have not been established in Monterey County. In the absence of any GHG emissions significance thresholds, the project is compared to the Association of Monterey Bay Area Governments (AMBAG) Metropolitan Transportation Plan/ Sustainable Communities Strategy (MTP/SCS) (2014), which establishes an overall GHG target for the project region consistent with both the target date of Assembly Bill (AB) 32 (2020) and the post-2020 GHG reduction goals of Executive Order S-03-05 (2005) and Executive Order B-30-15 (2015).

As identified in **Table 3.13-1**, mobile-source emissions are the most potent contributor of GHG emissions associated with the proposed project. AMBAG was tasked by the California Air Resources Board (CARB) to achieve no net increase in mobile-source GHG emissions compared to 2005 vehicle emissions by 2020 and a 5 percent per capita reduction by 2035, which CARB confirmed the project region would not only achieve but surpass by implementing its MTP/SCS (CARB 2014). While the GHG reduction targets contained in the MTP/SCS cannot be directly translated to an all-encompassing threshold given it is geared toward GHG emissions from transportation only, GHG emissions resulting from project-related transportation sources are the most potent source of emissions. Therefore, project comparison to the MTP/SCS is an appropriate indicator of whether the proposed annexation would inhibit the GHG reduction goals promulgated by the state. The MTP/SCS contains GHG-reducing programs, including multimodal transportation investments such as bus rapid transit, commuter rail, active transportation strategies (e.g., bikeways and sidewalks), transportation demand management strategies, transportation systems management, highway improvements (interchange improvements, high-occupancy vehicle lanes), arterial improvements, goods movement strategies, aviation and airport ground access improvements, and operations and maintenance to the existing multimodal transportation system. AMBAG's MTP/SCS identifies that land use strategies which focus new housing and job growth in areas served by high quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network, which emphasizes system preservation, active transportation, and transportation demand management measures.

The 2014 MTP/SCS incorporates local land use projections and circulation networks from the cities' and counties' general plans. The projected regional development pattern, including location of land uses and residential densities in local general plans, when integrated with the proposed regional transportation network identified in the 2014 MTP/SCS, would reduce per capita vehicular travel–related GHG emissions and achieve the GHG reduction per capita targets for the AMBAG region.

The majority of the project site was included in the City's General Plan and proposed Sphere of Influence (SOI) boundaries in 2005, and therefore has been anticipated to accommodate mixed-use development since that time. The City subsequently filed a resolution of application with the Monterey County Local Agency Formation Commission (LAFCO) to expand the SOI boundary proposed in the 2005 General Plan. On March 26, 2007, LAFCO approved a comprehensive, although scaled down, amendment to the City's SOI. As a result, the project site was considered as a developing area in the MTP/SCS. This is further evidenced by the fact that the project site is shown as an area anticipated for urban development in the document, *Envisioning the Monterey Bay Area: A Blueprint for Sustainable Growth and Smart Infrastructure* (AMBAG 2011) (referred to as The Blueprint), which presents a vision for how the region would achieve its GHG reduction targets. In addition, Figure 4-10b of the MTP/SCS identifies the project area as planned for Suburban Commercial/Mixed Use. The site is proposed to accommodate a mixed-use land use scheme. This is consistent with the MTP/SCS goal to invest in safe bicycle and pedestrian routes

that improve connectivity and access to common destinations, such as connections between residential areas and schools, employment centers, neighborhood shopping, and transit stops and stations, supporting efforts throughout the region to improve connectivity (AMBAG 2014). Since this site is proposed for mixed use, it is expected that people will be able to walk and bike, thus reducing GHG emissions from cars.

As previously described, the most potent source of GHG emissions associated with land use development is mobile-source emissions. To quantify the effects of the proposed project on traffic conditions compared with the original project, subject of the previously certified EIR, Hatch Mott MacDonald provided a comparison of the project as analyzed in 2006 against the current project's trip generation and land use assumptions. According to this analysis, the changes in land use will result in a net reduction of 133 average daily trips. CalEEMod was used to identify the quantity of CO_2e reduced due to 133 less daily trips and determined GHG emissions would be decreased by 158 metric tons under the proposed project as compared with the land uses originally analyzed in the South End SOI Final EIR in 2006 (see **Appendix D**). Such reductions in projected mobile-source GHG emissions are consistent with the primary purpose of the MTP/SCS.

For these reasons, the proposed project is consistent with the 2014 MTP/SCS and its greenhouse gas reduction targets for Monterey County.

Conclusion

The impact of GHG emissions on climate change was known at the time of adoption of the South End SOI Final EIR in 2006; therefore, under CEQA standards, it is not new information that requires analysis in a supplemental EIR or negative declaration. No supplemental environmental analysis of the project's impacts on this issue is required under CEQA. Nonetheless, for purposes of full disclosure, a GHG analysis of the South End Annexation development was prepared. As demonstrated, the proposed project site has been anticipated for urban development in the form of Suburban Commercial/Mixed Use by the AMBAG 2014 MTP/SCS and is consistent with the /MTPSCS goal to invest in safe bicycle and pedestrian routes that improve connectivity and access to common destinations. Furthermore, the changes in land use between the proposed project and the original project analyzed in the previous EIR result in a net reduction of 133 average daily trips and thus a decrease of 158 metric tons of mobile-source GHG emissions. GHG-related impacts would be **less than significant**.

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